

Estrella Substation and Paso Robles Area Reinforcement Project
PG&E Comments on Draft Environmental Impact Report
Attachment 1
Text Revisions and Requests for Clarification

Page	Draft EIR Language	Comments
Executive Summary		
J-92 ES-6	Proposed Project construction activities would include site preparation, excavation, installation of equipment and structures, and restoration. Construction of the Estrella Substation would require a survey marking staging areas and work areas, establishment of the private access road, vegetation clearance, fencing installation, grading, installation of culverts and swales, excavation of foundations, installation of facilities, and cleanup and post-construction restoration.	A land survey would not be required to mark staging areas and work areas. Revise text as follows: Proposed Project construction activities would include site preparation, excavation, installation of equipment and structures, and restoration. Construction of the Estrella Substation would require a survey marking staging areas and work areas, establishment of the private access road, vegetation clearance, fencing installation, grading, installation of culverts and swales, excavation of foundations, installation of facilities, and cleanup and post-construction restoration.
J-93 ES-11	Under the No Project Alternative, HWT and PG&E would not construct or operate the substation or new and reconductored 70 kV power line segments. The No Project Alternative would not provide transmission system redundancy, increased distribution capacity or improved electrical service reliability, and would not meet any of the project objectives.	Also supports reliability objective.
J-94 ES-11	The Bonel Ranch site is located within the County of San Luis Obispo North County Planning Area, El Pomar-Estrella Sub Area, and is currently used to grow alfalfa.	The sub areas are not described for the other substation sites in the Executive Summary chapter. Delete reference for consistency. Revise text as follows: The Bonel Ranch site is located within the County of San Luis Obispo North County Planning Area, El Pomar-Estrella Sub Area , and is currently used to grow alfalfa.
J-95 ES-15	CEQA Guidelines Section 15123(b) requires that an Executive Summary identify “areas of controversy known to a lead agency including issues raised by agencies and the public.” To date, a number of issues have been raised regarding the Proposed Project which may be considered controversial, including the following: Potential for overhead power lines to result in various environmental and societal impacts, including aesthetic impacts, fire risk, hazards associated with electromagnetic fields (EMFs), decreased property values, noise impacts, and interference with helicopters used in firefighting.	The EIR should clarify that EMFs and property value considerations fall outside the scope of CEQA. Revise text as follows: CEQA Guidelines Section 15123(b) requires that an Executive Summary identify “areas of controversy known to a lead agency including issues raised by agencies and the public.” To date, a number of issues have been raised regarding the Proposed Project which may be considered controversial, including the following: Potential for overhead power lines to result in various environmental and societal impacts, including aesthetic impacts, fire risk, hazards associated with electromagnetic fields (EMFs), decreased property values, noise impacts, and interference with helicopters used in firefighting. However, CEQA is concerned with impacts on the physical environment; therefore, issues related to EMFs and decreased property values are outside the scope of this EIR.
Chapter 1 - Introduction		
J-96 1-1	Per CEQA Guidelines section 15022, CEQA’s basic purposes are to:	The CEQA Guidelines citation is incorrect. Revise text as follows: Per CEQA Guidelines section 15022 <u>15002</u> , CEQA’s basic purposes are to:
Chapter 2 – Project Description		
J-97 2-13	Table 2-4, Footnote 3: “The original 190.14 MW from 2016 has been corrected to reflect the true value of 185.50.”	This clarification was made by PG&E in Appendix G to explain the change from previous versions; however, without the original version, this footnote may cause confusion to the public. This footnote should be removed. Remove the following text: The original 190.14 MW from 2016 has been corrected to reflect the true value of 185.50.”
J-98 2-18	PG&E to construct, own and operate a new 230 kV transmission line interconnection that will loop the existing Gates-Morro Bay 230kV into Estrella.	The name of the transmission line has changed. Revise text as follows: PG&E to construct, own and operate a new 230 kV transmission line interconnection that will loop the existing Gates-Morro Bay <u>California Flats</u> 230 kV transmission line into Estrella Substation.
J-99 2-21	Power would be supplied by tapping into the existing PG&E Gates- Morro Bay 230kV power line adjacent to the HWT substation site.	The name of the transmission line has changed. Revise text as follows: Power would be supplied by tapping into the existing PG&E Gates-Morro Bay <u>California Flats</u> 230 kV power transmission line adjacent to the HWT substation site.

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J-100	2-61	Once all of the environmental permits from the applicable siting and regulatory agencies have been obtained, and grading and drainage has been constructed for the entire substation site, HWT would sell PG&E the land necessary for construction of the 70 kV substation and 230 kV interconnection.	Revise text as follows: Once all of the environmental permits from the applicable siting and regulatory agencies have been obtained, and grading and drainage has been constructed for the entire substation site, HWT would sell <u>the land and/or grant easements to</u> PG&E the land necessary for construction of the 70 kV substation and 230 kV interconnection.
J-101	2-61 and 2-62	Two additional LSTs would be used to complete the interconnection and would be installed on the parcel that would be acquired for the development of Estrella Substation.	Revise text as follows: Two additional LSTs <u>or TSPs</u> would be used to complete the interconnection and would be installed on the parcel that would be acquired for the development of Estrella Substation.
J-102	2-63	Site construction fencing would be installed during the site preparation stage, and would require digging to a depth of 4 feet to install fencing anchors.	As stated in our comments on the Draft Project Description, construction fencing would require digging to a depth of 5 feet to install fence footings. Revise text as follows: Site construction fencing would be installed during the site preparation stage, and would require digging to a depth of <u>4-5</u> feet to install <u>fencing anchors</u> footings.
J-103	2-64	The control house will be delivered and installed on concrete piers.	The control house will be installed on a concrete slab. Revise as follows: The control house will be delivered and installed on <u>a concrete piers slab</u> .
J-104	2-65	The OPGW at each new tower would be secured, an existing LST would be removed, and two LSTs would be installed for the Estrella Substation interconnection.	Changes made to be consistent with Section 2.4 Easement Requirements Revise text as follows: <ul style="list-style-type: none"> • The OPGW at each new tower would be secured; • <u>The relocated 230 kV tower and three LSTs associated with the 230 kV interconnection would be installed within the existing transmission line easement</u> • an existing LST would be removed, and • two LSTs would be installed for the Estrella Substation interconnection • <u>Two additional LSTs or TSPs would be used to complete the interconnection and would be installed on the parcel that would be acquired for the development of Estrella Substation</u>
J-105	2-71	Old wood poles would simply be lifted out of the ground using mechanical equipment. Removal of steel poles would occur by excavating an area around the pole to a depth of approximately 2 to 4 feet, or deeper if requested by private property owners. The pole would then be cut off and the remaining base would be buried in place. All removed poles would be transported off site to the staging area or to the PG&E Service Center for reuse evaluation. Bases of the poles would then be removed by excavating the area around the base. The remaining void would then be backfilled with native soil saved from other excavations in the surrounding area. The site would be returned, as near as practicable, to its original contours (or in accordance with prearranged landowner agreements, where applicable).	Revise text as follows: Old wood poles would simply be lifted out of the ground using mechanical equipment. Removal of steel poles would occur by excavating an area around the pole to a depth of approximately 2 to 4 feet, or deeper if requested by private property owners. <u>The remaining void would then be backfilled with native soil saved from other excavations in the surrounding area. The site would be returned, as near as practicable, to its original contours (or in accordance with prearranged landowner agreements, where applicable).</u> The pole would then be cut off and the remaining base would be buried in place. All removed poles would be transported off site to the staging area or to the PG&E Service Center for reuse evaluation. <u>Bases of the poles would then be removed by excavating the area around the base. The remaining void would then be backfilled with native soil saved from other excavations in the surrounding area. The site would be returned, as near as practicable, to its original contours (or in accordance with prearranged landowner agreements, where applicable).</u>
J-106	2-71	Sometimes the switches are thrown at a central location such as a substation.	Revise text as follows: Sometimes the switches are thrown <u>circuit breakers are opened at a</u> central location such as a substation.
Chapter 3 –Alternatives Description			
J-107	3-112	BESS facilities under Alternative BS-2 would function to “shave” peak loads during periods when energy use along these feeders is high (i.e., reduce peak loads during the summer) to relieve pressure on the area substations and feeders. BESSs would likely operate on a daily cycle where they would discharge to the distribution grid during hours of peak demand and charge from the distribution grid during hours of lower demand (e.g., nighttime). Sites	Please move “Sites” to precede the paragraph and make a heading. Revise text as follows: <u>Sites</u> BESS facilities under Alternative BS-2 would function to “shave” peak loads during periods when energy use along these feeders is high (i.e., reduce peak loads during the summer) to relieve pressure on the area substations and feeders. BESSs would likely operate on a daily cycle where they would discharge to the distribution grid during hours of peak demand and charge from the distribution grid during hours of lower demand (e.g., nighttime). <u>Sites</u>
Chapter 4 –Environmental Analysis			
Aesthetics			
J-108	4.1-4	The reasonably foreseeable northern distribution line segment would follow the existing SR 46 right-of-way (installed within the median).	The northern distribution segment would not be installed within the median. It would be installed on one side of the SR-46, which has not yet been determined. Revise as follows: The reasonably foreseeable northern distribution line segment would <u>follow parallel</u> the existing SR 46 right-of-way (installed <u>within the median on one side or the other on private property</u>).

J-109 J-110 J-111 J-112 J-113 J-114 J-115		<table><tr><th>Page</th><th>Draft EIR Language</th><th>Comments</th></tr><tr><td>4.1-8</td><td>Additionally, the northern reasonably foreseeable new distribution line segment would be installed within the median of SR 46 , while Alternative PLR-1A would also traverse SR 46 near the intersection with Branch Road.</td><td>The northern distribution segment would not be installed within the median. It would be installed on one side of the SR-46, which has not yet been determined. Revise as follows: The reasonably foreseeable northern distribution line segment would follow the existing SR 46 right-of-way (installed within the median on one side or the other on private property).</td></tr><tr><td>4.1-38</td><td>For criterion C, as described in Section 4.1.4, the Proposed Project, reasonably foreseeable distribution components, and alternatives are located primarily in non-urbanized areas.</td><td>Per CEQA Guidelines Section 21071, the Proposed Project, reasonably foreseeable distribution components, and alternatives are entirely located in non-urbanized areas. Revise text as follows: For criterion C, as described in Section 4.1.4, the Proposed Project, reasonably foreseeable distribution components, and alternatives are located primarily in non-urbanized areas.</td></tr><tr><td>4.1-41</td><td>The Proposed Project’s new 70 kV power line segment would have similar adverse effects on the existing visual conditions, although the degree of impact would vary by location. Effects would be most pronounced in areas of the proposed 70 kV alignment that do not have existing transmission or distribution lines and in areas subject to immediate views from residents and recreationists. Dissimilarly, the reconductoring segment would replace existing poles and reconductor the existing power line; thus, it would not substantially change the existing visual character or quality in this area or be inconsistent with zoning regulations (transmission structures are allowed in all zoning districts along the alignment).</td><td>State that the proposed new power line segment would also not be inconsistent with zoning regulations. Revise text as follows: The Proposed Project’s new 70 kV power line segment would have similar adverse effects on the existing visual conditions, although the degree of impact would vary by location. Effects would be most pronounced in areas of the proposed 70 kV alignment that do not have existing transmission or distribution lines and in areas subject to immediate views from residents and recreationists. 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Mitigation Measure AES-1 would also require that transmission structures have a dulled finish.</td><td>Revise text as follows: Mitigation Measure AES-1, described below, would require that landscaping, including drought- and fire- resistant native shrubs, be incorporated along Union Road in front of the substation (to the extent that this does not increase fire risk and complies with the standards provided PG&E’s Wildfire Safety Inspection Program and Cal Fire’s defensible space guidelines) and that materials and paint colors be selected for Proposed Project features that would reduce visual contrast and complement the surrounding landscape. Mitigation Measure AES-1 would also require that transmission structures have a dulled finish.</td></tr><tr><td>4.1-42</td><td>Mitigation Measure AES-1. Use Landscaping, Design and Architectural Elements to Complement the Surrounding Visual Landscape. 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J-116	4.1-42	<p>Mitigation Measure AES-1. Use Landscaping, Design and Architectural Elements to Complement the Surrounding Visual Landscape.</p> <p>With respect to power line and transmission structures, balance the need to minimize visual contrast with ensuring that structures are visible to aircraft pilots and birds</p>	<p>Mitigation Measure AES-1 also requires that all components be dulled. This requirement conflicts with this portion of the measure regarding balancing the need to minimize visual contrast with visibility. Given that certain components would not be dulled (as noted above), PG&E recommends removing this portion of the measure.</p> <p>Revise text as follows:</p> <p>Mitigation Measure AES-1 With respect to power line and transmission structures, balance the need to minimize visual contrast with ensuring that structures are visible to aircraft pilots and birds.</p>
J-117	4.1-43	<p>Mitigation Measure AES-1. Use Landscaping, Design and Architectural Elements to Complement the Surrounding Visual Landscape.</p> <p>For all Proposed Project and alternative components, use materials and paint colors that are compatible with the surrounding area (i.e., dull grey, light brown, or green colors) in order to minimize visual contrast. Avoid the use of large expanses of reflective glazing, aluminum panels, and other materials not normally found in the environment. Use a dulled finish on power line and transmission structures.</p>	<p>Tubular steel poles and light duty steel poles are ordered with a dulled finish. Lattice steel towers that have a dulled finished need to be pre-ordered 6 months ahead of time and are priced at a premium. As such, PG&E's preference is to not have to purchase these special ordered structures. The conventional structures would dull over time. Power line conductors will be specular to make the power line more noticeable in appearance against the background landscape, and therefore more visible to small aircraft pilots that fly over the area. Specular conductor transitions to non-specular (i.e., becomes less shiny) in the course of a few seasons after installation. PG&E's standard design is to use galvanized structures and tubing in the substation to reduce corrosion, extend life, and maintain proper grounding.</p> <p>Revise text as follows: For all Proposed Project and alternative components (not including the power line conductors, lattice steel towers, or substation structures), use materials and paint colors that are compatible with the surrounding area (i.e., dull grey, light brown, or green colors) in order to minimize visual contrast. Avoid the use of large expanses of reflective glazing, aluminum panels, and other materials not normally found in the environment. Use a dulled finish on power line and transmission structures.</p>
J-118	4.1-43	<p>While most operation and maintenance activities would occur during the daytime hours when no or minimal additional lighting would be needed, it is possible that nighttime maintenance may be needed on rare occasions (e.g., in the event of an emergency). In these instances, maintenance activities at the Estrella Substation and along the power line route may require extra nighttime lighting; however, use of nighttime lighting would be sporadic and limited in duration. Additionally, implementation of APM AES-2 would further reduce this impact.</p>	<p>APMs should not be applied to operation and maintenance.</p> <p>Revise text as follows:</p> <p>While most operation and maintenance activities would occur during the daytime hours when no or minimal additional lighting would be needed, it is possible that nighttime maintenance may be needed on rare occasions (e.g., in the event of an emergency). In these instances, maintenance activities at the Estrella Substation and along the power line route may require extra nighttime lighting; however, use of nighttime lighting would be sporadic and limited in duration. Additionally, implementation of APM AES-2 would further reduce this impact.</p>
J-119	4.1-51	<p>In particular, the segment along South River Road to Santa Ysabel Avenue would adversely affect the existing visual character and quality of views in this area, as no electrical power lines currently exist in this non-urbanized rural-residential area, which is characterized by mature trees that line the road and rolling hillsides (as seen in KOP 22, Figure 4.1-17).</p>	<p>Clarify the starting point along South River Road.</p> <p>Revise text as follows:</p> <p>In particular, the segment along South River Road between Lothan lane and Santa Ysabel Avenue would adversely affect the existing visual character and quality of views in this area, as no electrical power lines currently exist in this non-urbanized rural-residential area, which is characterized by mature trees that line the road and rolling hillsides (as seen in KOP 22, Figure 4.1-17).</p>
Agriculture			
J-120	4.2-4	<p>Table 4.2-1. FMMP Acreage at the Estrella Substation Site</p>	<p>Farmland of Local Potential is not defined. According to the Department of Conservation (https://www.conservation.ca.gov/dlrp/fmmp/Documents/Farmland_of_Local_Importance_2016.pdf), this farmland category is defined as follows:</p> <p>Add a footnote to define Farmland of Local Potential as:</p> <p><i>Local Potential (LP):</i> lands having the potential for farmland, which have Prime or Statewide characteristics and are not cultivated.</p>
J-121	4.2-12	<p>70 kV power line would occur within the immediate footprint of individual poles, as well as 10- foot radius around each pole that would be maintained clear of vegetation. As shown in Table 4.2-2, the Proposed Project (substation and power line) would permanently convert 2.66 acres of Farmland of Statewide Importance and 11.76 acres of Unique Farmland to non-agricultural uses. Additionally, 0.69 acres of Prime Farmland, 4.9 acres of Farmland of Statewide Importance, and 25.28 acres of Unique Farmland would be temporarily affected by the Proposed Project construction activities. Temporary effects include temporary loss or destruction of crops, placement of rock and materials, compaction of soil from heavy equipment and vehicles, and removal of topsoil.</p>	<p>Revise the disturbance calculations to account for the four exiting distribution poles that will be removed on Unique Farmland and the four existing distribution poles that will be removed on Farmland of Statewide Importance in the vicinity of Estrella Substation. Assuming agricultural crops were previously removed within an area around each existing pole equal to 10 feet in diameter, returning this area back to agricultural use would result in a net reduction of permanent impacts by approximately 314 square feet of Unique Farmland and 314 square feet Farmland of Statewide Importance.</p>
J-122	4.2-13 and 4.2-14	<p>Mitigation Measure AG-1: Provide Compensation for Loss of Agricultural Land.</p> <p>HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall contribute sufficient funds (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives. The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California though the use of agricultural conservation easements. The amount of HWT's and PG&E's contribution shall ensure the conservation of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by the Proposed Project or alternatives, based on the market price for the commensurate agricultural land at the time that the impacts occur.</p>	<p>Revise text as follows:</p> <p>HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall <u>finalize and effectuate any combination of the following as long as the total acreage in the aggregate equals the amount required by the conservation ratio specified below: either (1) contribute sufficient funds, in an amount equal to the fair market value (determined as of the date construction commenced) of each acre for which the contribution is made, (1-a), adequate to support the conservation ratio described below</u> to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives, <u>or to another public agency or non-profit organization able to achieve long-term preservation of agricultural lands in San Luis Obispo County; and/or (2) enter into and record one or more conservation easements with landowners for specific farmland in San Luis Obispo County.</u> The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California though the use of agricultural conservation easements <u>and is one potential recipient of any contribution in clause (1) above.</u> The <u>acreage for which amount of HWT's and PG&E's contributions are made in clause (1) above, together with any acreage preserved through recorded conservation easements in clause (2) above, shall equal a minimum total ensure the conservation of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by their respective components associated with the Proposed Project or alternatives, based on the market price for the commensurate agricultural land at the time that the impacts occur.</u></p>

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J-123	4.2-14	Mitigation Measure AG-2: Restore Agricultural Land Temporarily Impacted by Construction Activities. HWT or PG&E shall ensure that agricultural land temporarily impacted by construction activities is adequately restored following completion of construction to pre-project conditions. These include areas impacted from establishment of temporary staging and storage areas, installation of the underground fiber optic cable link, installation of the 230 kV interconnection structures, preparation and temporary use of pull sites and crossing guard structures, and preparation and use of helicopter landing zones. Restoration of sites will involve removing any rock or material imported to stabilize the site, replacement of topsoil, de-compacting any soil that has been compacted by heavy equipment, and re-planting of agricultural crops. The responsibility of performing these various tasks may be stipulated in an agreement between HWT or PG&E, and the landowner(s) completed for the Proposed Project or alternatives. If a landowner is better equipped or prefers to replant crops or perform other tasks themselves, then HWT and PG&E shall provide just compensation for this work.	Revise text as follows: HWT or PG&E shall ensure that agricultural land temporarily impacted by construction activities <u>associated with their respective components</u> is adequately restored following completion of construction to pre-project conditions. These include areas impacted from establishment of temporary staging and storage areas, installation of the underground fiber optic cable link, installation of the 230 kV interconnection structures, preparation and temporary use of pull sites and crossing guard structures, and preparation and use of helicopter landing zones. Restoration of sites will involve removing any rock or material imported to stabilize the site, replacement of topsoil, de-compacting any soil that has been compacted by heavy equipment, and re-planting of agricultural crops <u>unless the property owner requests that the material remain for their use</u> . The responsibility of performing these various tasks may be stipulated in an agreement between HWT or PG&E, and the landowner(s) completed for the Proposed Project or alternatives. If a landowner is better equipped or prefers to replant crops or perform other tasks themselves, then HWT <u>and/or</u> PG&E shall provide just compensation for this work.
J-124	4.2-16	The northern reasonably foreseeable new distribution line segment would be installed primarily within the median of SR- 46 and would not substantially affect Important Farmland, zoning for agricultural uses, or Williamson Act contracts.	The northern distribution segment would not be installed within the median. It would be installed on one side of the SR-46, which has not yet been determined. Revise as follows: The northern reasonably foreseeable new distribution line segment would <u>be installed primarily within the median of parallel the existing</u> SR- 46 <u>right-of-way</u> and would not substantially affect Important Farmland, zoning for agricultural uses, or Williamson Act contracts.
J-125	4.2-17	The Bonel Ranch parcel is not under a Williamson Act contract; therefore, there would be no potential to conflict with a Williamson Act contract. As a result, impacts under significance criterion B would be less than significant	According to the San Luis Obispo County Land Use Viewer, the Bonel Ranch site is subject to a Williamson Act contract. Revise text as follows: The Bonel Ranch parcel is <u>not</u> under a Williamson Act contract; therefore, <u>there construction of Bonel Ranch Substation would would be no potential to conflict with a Williamson Act contract</u> . As a result, impacts under significance criterion B would be <u>less than significant and unavoidable</u> .
J-126	4.2-20	The routes would pass through some areas of Farmland of Local Importance, Farmland of Local Potential, and Grazing Land, but the 70 kV power line segment under Alternative PLR-3 would be almost entirely underground (other than the small transition stations on either end of the alignments) and would not permanently substantial agricultural land.	Revise text as follows: The routes would pass through some areas of Farmland of Local Importance, Farmland of Local Potential, and Grazing Land, but the 70 kV power line segment under Alternative PLR-3 would be almost entirely underground (other than the small transition stations on either end of the alignments) and would not permanently <u>substantial impact</u> agricultural land.
	Air Quality		
J-127	4.3-14	Impact AQ-2: Potential to violate ROG, NOX, and PM10 significance thresholds and contribute substantially to an existing or projected air quality violation - Significant and Unavoidable	The impact title does not match the title on page 4.3-12. Revise text as follows: Impact AQ-2: <u>Potential to violate ROG, NOX, and PM10 significance thresholds and contribute substantially to an existing or projected air quality violation—Significant and Unavoidable Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard</u>
J-128	4.3-16	Table 4.3-5, Construction Emissions	Provide the tier associated with the 26.3 tons/quarter ROG + NOX significance threshold.
J-129	4.3-18	Mitigation Measure AQ-1: Prepare a Construction Activity Management Plan for Approval by SLOCAPCD. HWT, PG&E, or their contractor(s) shall implement the following measures: Prepare a Construction Activity Management Plan (CAMP) that contains at a minimum the following SLOCAPCD standard mitigation measures, BACT measures and diesel idling restrictions that are not already in the APMs. The CAMP shall be submitted to the air pollution control district (APCD) for review and approval prior to the start of construction and shall include, but not be limited to, the following elements: 1. A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures that were listed above in the “dust control measures” section; 2. Tabulation of on and off-road construction equipment (age, horse-power and miles and/or hours of operation). Use of diesel construction equipment meeting ARB’s Tier 3 and Tier 4 off-road and 2010 on-road compliant engines; Repowering equipment with the cleanest engines available; At a minimum the off-road equipment fleet shall meet the CARB off-road emissions average for that calendar year. 3. Scheduling of construction truck trips during non-peak hours to reduce peak hour emissions	The CAMP submitted to the SLOCAPCD will meet all of their requirements, which are subject to change. To avoid confusion and unnecessary overlap, we will follow the guidance for development of the CAMP, with regard to dust control, construction equipment requirement, scheduling, hours of operation, length of work periods, and any other requirements. Revise text as follows HWT, PG&E, or their contractor(s) shall implement the following measures: Prepare a Construction Activity Management Plan (CAMP) that contains <u>at a minimum</u> the following SLOCAPCD standard mitigation measures, BACT measures and diesel idling restrictions that are not already in the APMs. The CAMP shall be submitted to the air pollution control district (APCD) for review and approval prior to the start of construction, <u>and shall include, but not be limited to, the following elements:</u> <u>1. A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures that were listed above in the “dust control measures” section;</u> <u>2. Tabulation of on and off-road construction equipment (age, horse-power and miles and/or hours of operation). Use of diesel construction equipment meeting ARB’s Tier 3 and Tier 4 off-road and 2010 on-road compliant engines; Repowering equipment with the cleanest engines available; At a minimum the off-road equipment fleet shall meet the CARB off-road emissions average for that calendar year;</u> <u>3. Scheduling of construction truck trips during non-peak hours to reduce peak hour emissions</u>
J-130	4.3-18	Mitigation Measure AQ-1: Prepare a Construction Activity Management Plan for Approval by SLOCAPCD. 3. Scheduling of construction truck trips during non-peak hours to reduce peak hour emissions	Clarify the meaning of non-peak hour and revise text as follows: 3. Scheduling of construction truck trips during non-peak hours to reduce peak hour emissions, <u>when possible</u> .

J-131			
J-132			
J-133			
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Biological Resources			
J-133	4.4-1 to 4.4-2	The Bald and Golden Eagle Protection Act (16 USC Section 668; 50 CFR Part 22) prohibits take of bald and golden eagles and their occupied and unoccupied nests. USFWS administers the Bald and Golden Eagle Protection Act. In addition to immediate impacts, “take” also covers impacts that result from human-induced alterations initiated around a previously used nest site. Even if eagles are not present during the time of the alterations, if eagle(s) subsequently return and the alterations agitate or bother an eagle to a degree that it interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment, this would be considered take.	Revise text as follows: The Bald and Golden Eagle Protection Act (16 USC Section 668; 50 CFR Part 22) prohibits take of bald and golden eagles and their occupied and unoccupied nests. USFWS administers the Bald and Golden Eagle Protection Act. <u>PG&E is in the process of working with the USFWS to receive a permit under the Bald and Golden Eagle Protection Act to address work activities in areas with eagle territories.</u> In addition to immediate impacts, “take” also covers impacts that result from human-induced alterations initiated around a previously used nest site. Even if eagles are not present during the time of the alterations, if eagle(s) subsequently return and the alterations agitate or bother an eagle to a degree that it interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment, this would be considered take.
	4.4-1 to 4.4-2	In addition to immediate impacts, “take” also covers impacts that result from human-induced alterations initiated around a previously used nest site. Even if eagles are not present during the time of the alterations, if eagle(s) subsequently return and the alterations agitate or bother an eagle to a degree that it interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment, this would be considered take.	This interpretation of “take” is speculative and should be limited to the USFWS administration of the Bald and Golden Eagle Protection Act to protect eagles, eagle nests, and eggs or young from all definitions of take under the ESA. Revise as follows: <u>In addition to immediate impacts, “take” also covers impacts that result from human-induced alterations initiated around a previously used nest site. Even if eagles are not present during the time of the alterations, if eagle(s) subsequently return and the alterations agitate or bother an eagle to a degree that it interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment, this would be considered take.</u>
J-135	4.4-9	Special-status species include (1) species listed, or that are candidates for future listing, as threatened or endangered under the federal ESA or CESA; (2) plants listed as rare under NPPA; (3) plants considered by the CNPS to be “rare, threatened, or endangered in California” (CNPS Rare Plant Ranks 1 and 2); (4) species that meet the definitions of rare or endangered under CEQA; (5) animals fully protected in California under the CFGC, and (6) nesting raptors protected in California.	Revise text as follows: Special-status species include (1) species listed, or that are candidates for future listing, as threatened or endangered under the federal ESA or CESA; (2) plants listed as rare under NPPA; (3) plants considered by the CNPS to be “rare, threatened, or endangered in California” (CNPS Rare Plant Ranks 1 and 2); (4) species that meet the definitions of rare or endangered under CEQA; (5) animals fully protected in California under the CFGC, and (6) nesting raptors protected in California under <u>CFGC 3503.5.</u>
J-136	4.4-20, Table 4.4-1	Table 4.4-1	Remove great blue heron from Table 4.-1, as it is not a special-status species
J-137	4.4-29	Figure 4.4-1	Please label the Salinas River and Dry Creek in Figure 4.4-1
J-138	4.4-39	Based on a review of the Ventura USFWS office’s Habitat Conservation Plans (HCPs) and CDFW’s California Regional Conservation Plans map (CDFW 2019b), there are no adopted HCPs or Natural Community Conservation Plans (NCCPs) in the vicinity of the Proposed Project, reasonably foreseeable distribution components, or alternatives	Revise text as follows: Based on a review of the <u>Ventura USFWS office’s Habitat Conservation Plans (HCPs)</u> and CDFW’s California Regional Conservation Plans map (CDFW 2019b), there are no adopted <u>HCPs or</u> Natural Community Conservation Plans (NCCPs) in the vicinity of the Proposed Project, reasonably foreseeable distribution components, or alternatives. <u>PG&E has executed a Multi-Region Habitat Conservation Plan (HCP), which provides federal endangered species coverage for the entire service territory. However, the HCP does not apply to new construction over 10 acres or more than 2 miles. As such, the HCP would not apply to the proposed project, although it would apply to the Reasonably Foreseeable Distribution Components and Ultimate Substation Buildout.</u>
J-139	4.4-40	In regard to significance criterion F above, no NCCPs or HCPs are adopted in the vicinity of the Proposed Project, reasonably foreseeable distribution components, and alternatives. Therefore, there is no potential for conflicts and no impact would occur. This significance criterion is dismissed from further discussion.	The Multi-Region HCP would apply to the reasonably foreseeable distribution components.
J-140	4.4-41	If special-status plant species are identified in the construction disturbance area, however, and avoidance is not possible, direct impacts to these species would occur, which would be a significant impact due to the potential loss of a high number of individuals or entire populations within the region.	This is speculative. Surveys have not identified special-status plant populations in construction disturbance areas and if a special status plant were found it may or may not constitute “a potential loss of a high number of individuals or entire populations within the region” Revise text as follows: If special-status plant species are identified in the construction disturbance area, however, and avoidance is not possible, direct impacts to these species would occur, which <u>may would have the potential to be</u> a significant impact <u>in certain circumstances</u> due to the potential loss of a high number of individuals or entire populations within the region.

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J-141	4.4-42	<p>Crotch's bumble bee, which utilize rodent burrows, tufts of grass, old bird nests on the ground, rock piles, or cavities in dead trees for nest construction, has potential to occur within the Proposed Project area. Direct impacts to Crotch's bumble bee could occur if rodent burrows within the Proposed Project disturbance area were utilized as nests and destroyed through construction activities.</p> <p>Pre-construction surveys required under APM BIO-1 and Mitigation Measure BIO-1 would identify Crotch's bumble bee individuals or nests that could be present within the Proposed Project footprint. Additionally, implementation of APMs BIO-3 and GEN-1 would further reduce potential for any impacts to Crotch's bumble bee during construction. As a State candidate endangered species, the Applicants would be required to notify and coordinate with CDFW regarding any Crotch's bumble bee nests or individuals identified during pre-construction surveys or during the course of construction activities.</p>	<p>While preconstruction surveys would help avoid and minimize impacts to special-status species, surveying rodent burrows for the state candidate endangered Crotch's bumblebee within the project footprint is impracticable due to the abundance of burrow systems and absence of protocol survey guidance for identification of nest colonies. Current review of iNaturalist (https://www.inaturalist.org/taxa/271451-Bombus-crotchii accessed: January 4, 2021) show observation of the species occurring south and southeast of Santa Maria. The document recognizes the potential of species occurrence in the region, but little is known about its current distribution, hibernacula, or overwintering sites, and direct impacts cannot be adequately concluded due to the lack of this information.</p> <p>Applicants are required to follow all provisions of CESA in regard to California candidate or listed species, but are not specifically required to "notify and coordinate with CDFW" on any candidate or listed species identified during pre-construction surveys. An example would be Swainson hawk sightings may be voluntarily submitted to CDFW by filing a CNDDB detection form, but coordination and notification are not required for each sighting event.</p> <p>Revise text as follows:</p> <p>Pre-construction surveys required under APM BIO-1 and Mitigation Measure BIO-1 would identify Crotch's bumble bee individuals or nests that could be present within the Proposed Project footprint. Additionally, implementation of APMs BIO-3 and GEN-1 would further reduce potential for any impacts to Crotch's bumble bee during construction. As a State candidate endangered species, the Applicants would be required to follow all provisions of CESA in regard to California candidate or listed species notify and coordinate with CDFW regarding any Crotch's bumble bee nests or individuals identified during pre-construction surveys or during the course of construction activities.</p>
J-142	4.4-44	Construction could disturb breeding and nesting birds in the area by generating noise, creating visual distractions, or having a direct impact on occupied nests (e.g., vegetation removal or nest abandonment) and burrows (used by burrowing owls). Uncovered pipes or conduit could be used as nesting habitat for birds, and if left uncovered, birds could become trapped. Removal and disturbance of vegetation and trees along the proposed 70 kV power line route could directly impact foraging and nesting habitat for special-status birds. There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts would be significant.	<p>Revise text as follows:</p> <p>Construction could disturb breeding and nesting birds in the area by generating noise, creating visual distractions, or having a direct impact on occupied nests (e.g., vegetation removal or nest abandonment) and burrows (used by burrowing owls). Uncovered pipes or conduit could be used as nesting habitat for birds, and if left uncovered, birds could become trapped. Removal and disturbance of vegetation and trees along the proposed 70 kV power line route could directly impact foraging and nesting habitat for special-status birds. There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts may be would be significant</p>
J-143	4.4-44	There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts may be significant.	<p>PG&E has an avian protection plan and implements standard protective measures for birds during nesting season.</p> <p>Revise text to state:</p> <p>There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts may be significant.</p>
J-144	4.4-45	If work is scheduled during the nesting season (January 15 through August 31), APM BIO-2 and Mitigation Measure BIO-1 would require that nest detection surveys be implemented corresponding with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA).	<p>Standard nesting season dates are March 1st through August 15th or 31st; occasionally starting as early as February 1st. January 15th is still in winter timeframes with only select species such as golden eagles beginning to nest. As such, the January 15 nesting season restriction should only apply to golden eagles.</p> <p>Revise text as follows:</p> <p>If work is scheduled during the nesting season (commencing January 15 for golden eagle and February 1 for all other birds through August 31), APM BIO-2 and Mitigation Measure BIO-1 would require that nest detection surveys be implemented corresponding with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA).</p>
J-145	4.4-46	If any such roosts or bat individuals were identified, the Applicants would be required to notify and coordinate with CDFW. Additionally, APM AES-2 would require that construction lighting be selectively placed and shielded to minimize nighttime glare, which would minimize potential for this lighting to adversely affect bats.	If any such roosts or bat individuals were identified, the Applicants would be required to notify and coordinate with CDFW. Additionally, APM AES-2 would require that construction lighting be selectively placed and shielded to minimize nighttime glare, which would minimize potential for this lighting to adversely affect bats.
J-146	4.4-46	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status.</p> <p>Special-Status Plants: Pre-construction surveys required under APM BIO-1 shall be conducted of all proposed work, plus a 100-foot buffer, within 1 year before commencement of ground-disturbing activities according to the <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (CDFW 2018 or current version). Floristic surveys shall be performed during the appropriate bloom period(s) for each species. HWT/PG&E or their contractor(s) shall work with the CDFW-approved qualified botanist to identify plants</p>	<p>Revise as follows:</p> <p>Special-Status Plants: Pre-construction surveys required under APM BIO-1 shall be conducted of all proposed work, plus a 100-foot buffer, within 1 year before commencement of ground-disturbing activities according to the <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i>. Floristic surveys shall be performed during the appropriate bloom period(s) for each species. HWT/PG&E or their contractor(s) shall work with the CDFW <u>CPUC</u>-approved qualified botanist to identify plants</p>
J-147	4.4-46	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species: HWT/PG&E shall retain a CPUC-, USFWS-, and CDFW-approved biologist(s) to conduct pre-construction surveys for special-status plants and wildlife prior to initial vegetation clearance, grubbing, and ground-disturbing activities.</p>	<p>Revise text as follows:</p> <p>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species: HWT/PG&E shall retain a CPUC-, USFWS-, and CDFW-approved biologist(s) to conduct pre-construction surveys for special-status plants and wildlife prior to initial vegetation clearance, grubbing, and ground-disturbing activities.</p>
J-148	4.4-46	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species: The pre-construction survey report shall be submitted to the CPUC for review and approval prior to the start of construction.</p> <p>The pre-construction surveys shall be conducted no earlier than 30 days prior to surface disturbance. The results of the pre-construction surveys shall be documented by the approved biologist in a pre-construction survey report. The pre-construction survey report shall be submitted to the CPUC for review and approval prior to the start of construction, and the results shall be submitted to USFWS and CDFW as required by any regulatory permits or approvals. The pre-construction study report shall include the following:</p>	<p>Revise text as follows:</p> <p>The pre-construction survey report shall be submitted to the CPUC for review and approval prior to the start of construction</p> <p>The pre-construction surveys shall be conducted no earlier than 30 days prior to surface disturbance within the work areas. The results of the pre-construction surveys shall be documented by the approved biologist in a pre-construction survey report. The pre-construction survey report shall be submitted to the CPUC for review and approval prior to the start of construction, and the results shall be submitted to USFWS and CDFW as required by any regulatory permits or approvals. The pre-construction study report shall include the following:</p>

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J-149	4.4-47	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species: Sensitive habitat areas, plus a minimum 5-foot buffer for wetlands and waters of the U.S., that will be avoided by construction shall be fenced with orange safety fencing. Biological monitoring required by APM BIO-3 is extended to be necessary when each portion of previously undisturbed ground is disturbed, based on special- status species’ requirements and the profession opinion of the qualified biological monitor; however, work near wetlands and waters of the U.S. will be monitored by a biological monitor over its duration.</p>	<p>Revise text as follows:</p> <p>Sensitive habitat areas, plus a minimum 5-foot buffer for wetlands and waters of the U.S., that will be avoided by construction shall be fenced with orange safety fencing. Biological monitoring required by APM BIO-3 is extended to be necessary when each portion of previously undisturbed ground is disturbed, based on special- status species’ requirements and the profession opinion of the qualified biological monitor; however, work near <u>within 50 feet of</u> wetlands and waters of the U.S. will be monitored by a biological monitor over its duration.</p>
J-150	4.4-47	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species: Biological monitoring required by APM BIO-3 is extended to be necessary when each portion of previously undisturbed ground is disturbed, based on special-status species’ requirements and the profession opinion of the qualified biological monitor;</p>	<p>Please correct typo regarding biological monitoring being “extended.” Per APM BIO-3, biological monitoring will be conducted during initial ground-disturbing activities in and adjacent to sensitive habitat areas to ensure compliance with Best Management Practices and APMs, unless the area has been protected by barrier fencing to protect sensitive biological resources and has been cleared by the biologists. The monitor will have authority to stop or redirect work if construction activities are likely to affect sensitive biological resources.</p>
J-151	4.4-47	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species: In order to ensure that habitats are not adversely affected, the USFWS- and CDFW- approved biologist shall flag boundaries of habitat, which must be avoided</p>	<p>Revise text as follows:</p> <p>In order to ensure that habitats are not adversely affected, the USFWS- and CDFW-CPUC- approved biologist shall flag boundaries of habitat, which must be avoided.</p>
J-152	4.4-47	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species: The USFWS- and CDFW-approved biologist shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats</p>	<p>Revise text as follows:</p> <p>The USFWS- and CDFW-CPUC-approved biologist shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats</p>
J-153	4.4-48	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species: Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction. Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.</p>	<p>Gravel bags and other sediment controls will be requirements of the SWPPP and should not be included as mitigation.</p> <p>Revise text as follows:</p> <p>Pg. 29 Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction. Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.</p>
J-154	4.4-48	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species: In the event that any work will occur beyond the approved limits, it shall be reported to HWT’s and PG&E’s compliance teams and the CPUC.</p>	<p>Revise text as follows:</p> <p>In the event that any work will occur beyond the approved limits, it shall be reported to HWT’s and PG&E’s compliance teams and the CPUC.</p>
J-155	4.4-48	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Wildlife Protection from Work Areas: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment. Large/steep excavations shall be covered and/or fenced nightly to prevent wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route.</p>	<p>Revise text as follows:</p> <p>In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all uncovered and unfenced steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment. Large/steep excavations shall be covered and/or fenced nightly to prevent wildlife entrapment. Excavations shall provide an earthen ramp.</p>
J-156	4.4-48	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>Nesting Birds: Activities conducted pursuant to APM BIO-2 shall consider the nesting bird season revised to be January 15 through August 31</p>	<p>Revise text as follows:</p> <p>Activities conducted pursuant to APM BIO-2 shall consider the nesting bird season revised to be January 15 through August 31 <u>commencing January 15 for golden eagle and February 1 for all other birds through August 31</u></p>
J-157	4.4-49	<p>Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species.</p> <p>San Joaquin Kit Fox: If a kit fox is discovered at any time in the project area, all construction must stop and the CDFW and USFWS contacted immediately. The appropriate federal and state permits must be obtained before the project can proceed.</p>	<p>Revise text as follows:</p> <p>If a kit fox is discovered at any time in the project area, all construction <u>in the immediate vicinity</u> must stop, <u>photos taken as feasible</u>, and the CDFW and USFWS contacted immediately. The appropriate federal and state permits must be obtained before the project can proceed.</p>

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J-158	4.4-49	Mitigation Measure BIO-2: Compensate for Impacts to Special-Status Plant Species If avoidance of special-status plants is not feasible, HWT and PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at a CDFW-approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of CDFW. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW, it shall be conducted pursuant to a CPUC- and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness. At the end of the 5-year monitoring period, the mitigation shall have met the following success criteria: <ul style="list-style-type: none">A surveyed plant population size count roughly equal to or greater than the number of individuals transplanted (this total may include both transplanted individuals that have survived, as well as any additional supplemental plantings following the initial transplantation that have survived at least two growing seasons), and Less than 5 percent cover of invasive weeds within the restoration area.	Plant monitoring requirements would depend on the species impacted and restored and can be included in the salvage and relocation plan referenced. The 5-year monitoring requirement should be removed, as the amount of monitoring should be paired with the specific special-status plant restored. Revise text as follows: If avoidance of special-status plants is not feasible, HWT and PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at an CDFW -approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of the CPUC/CDFW . Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW , it shall be conducted pursuant to a CPUC- and CDFW -approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness. At the end of the 5-year monitoring period, the mitigation shall have met the following success criteria: <ul style="list-style-type: none">A surveyed plant population size count roughly equal to or greater than the number of individuals transplanted (this total may include both transplanted individuals that have survived, as well as any additional supplemental plantings following the initial transplantation that have survived at least two growing seasons); and Less than 5 percent cover of invasive weeds within the restoration area.
J-159	4.4-50	Additionally, the Applicants would implement the avian protection measures outlined in Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 (APLIC 2006), which include solutions such as spacing phase conductors (e.g., greater than the width of birds' wingspans) such that electrocution hazards are minimized.	PG&E has avian protection standards that are detailed within PG&E's companywide Avian Protection Plan. These standards have been tested and considered in conjunction with other required engineering standards. PG&E does not need to develop a project-specific Avian Protection Plan since it follows the companywide Avian Protection Plan to prevent collision and electrocutions of bird species, including special-status birds. Revise text as follows: Additionally, the Applicants would implement the avian protection measures outlined in <u>PG&E's Avian Protection Plan</u> , which incorporates relevant raptor -safe construction guidelines found in APLIC's and USFWS' 2005 Avian Protection Plan Guidelines. Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 (APLIC 2006) which include solutions such as spacing phase conductors (e.g., greater than the width of birds' wingspans) such that electrocution hazards are minimized.
J-160	4.4-50	To ensure that all potential hazards to special-status birds are minimized to the extent possible, Mitigation Measure BIO-3 also would be implemented, which would require that the Applicants incorporate guidance in <i>Reducing Avian Collisions with Power Lines: State of the Art in 2012</i> (APLIC 2012) and develop an Avian Protection Plan.	PG&E has avian protection standards that are detailed within PG&E's companywide Avian Protection Plan. These standards have been tested and considered in conjunction with other required engineering standards. PG&E does not need to develop a project-specific Avian Protection Plan since it follows the companywide Avian Protection Plan to prevent collision and electrocutions of bird species, including special-status birds. Revise text as follows: To ensure that all potential hazards to special-status birds are minimized to the extent possible, PG&E would implement Mitigation Measure BIO-3 also would be implemented, which would require that the Applicants <u>PG&E implement the company's Avian Protection Plan incorporate guidance in Reducing Avian Collisions with Power Lines: State of the Art in 2012 (APLIC 2012) and develop an Avian Protection Plan.</u>
J-161	4.4-50	Mitigation Measure BIO-3: Minimize Impacts to Raptors and Other Avian Life from Transmission and Power Line Facilities. HWT, PG&E, and/or their contractor(s) shall construct all aboveground power transmission and power lines to the APLIC's recommended publications: Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006, and Reducing Avian Collisions with Power Lines: State of the Art in 2012 (APLIC 2006, 2012). In conjunction with these publications, HWT and PG&E shall be responsible for creating an Avian Protection Plan that incorporates relevant project-specific guidelines found in APLIC's and USFWS' 2005 Avian Protection Plan Guidelines. As part of the Avian Protection Plan development, HWT and PG&E shall work with USFWS to determine the need for installation of bird diverters in areas near known golden and bald eagle nests.	PG&E incorporates APLIC guidance into PG&E's Avian Protection Plan and formulates standards for avian protection that are consistent with engineering requirements. PG&E should not be required to generate a separate project-specific avian protection plan to address concerns that are mitigated through its avian protection program which PG&E coordinates directly with USFWS on an annual basis. Revise text as follows: HWT , PG&E, and/or their contractor(s) shall construct all aboveground power transmission and power lines to the APLIC's recommended publications: Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006, and Reducing Avian Collisions with Power Lines: State of the Art in 2012 (APLIC 2006, 2012). In conjunction with these publications, HWT and PG&E shall be responsible for implementing the company's creating an Avian Protection Plan that incorporates relevant project-raptor -safe construction specific guidelines found in APLIC's and USFWS' 2005 Avian Protection Plan Guidelines.
J-162	4.4-51	Mitigation Measure BIO-3: Minimize Impacts to Raptors and Other Avian Life from Transmission and Power Line Facilities. As part of the Avian Protection Plan development, HWT and PG&E shall work with USFWS to determine the need for installation of bird diverters in areas near known golden and bald eagle nests.	Bird diverters may not be very helpful to prevent eagle contacts, instead careful consideration of design components should be followed under PG&E's avian protection standards to ensure that distribution lines are raptor-safe. Revise text as follows: As part of the Avian Protection Plan development , HWT and PG&E shall work with USFWS to determine the need for installation of bird diverters in areas near known golden and bald eagle nests.
J-163	4.4-51	Mitigation Measure BIO-3: Minimize Impacts to Raptors and Other Avian Life from Transmission and Power Line Facilities. Operational construction or replacement work shall be avoided during the nesting bird season (January 15 to August 31) to the extent feasible.	Revise text as follows: Operational c onstruction or replacement work shall be avoided during the nesting bird season (January 15 to August 31 <u>commencing January 15 for golden eagle and February 1 for all other birds through August 31</u>) to the extent feasible.

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J-164	4.4-51	Mitigation Measure BIO-3: Minimize Impacts to Raptors and Other Avian Life from Transmission and Power Line Facilities. If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive. If operational construction activities must occur within this buffer, the biologist shall coordinate with CDFW and, as necessary, USFWS to determine buffer reductions and/or nest monitoring to avoid impacts to active nests.	This statement requires coordination and approval from CDFW and/or USFWS when no-disturbance buffers are reduced. It is not appropriate or feasible for PG&E to seek approvals for buffer reductions pertaining to individual nests from CDFW or USFWS, as there is no specific mechanism (beyond CFGC or MBTA take prohibitions) for either agency to grant approvals for particular nest buffer distance reductions. Revise text as follows: If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive <u>in accordance with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA) as detailed in APM BIO-2 and Mitigation Measure BIO-1.</u> If operational construction activities must occur within this buffer, the biologist shall <u>inform CPUC, coordinate with CDFW, and, as necessary, USFWS to determine of any</u> buffer reductions and/or nest monitoring to avoid impacts to active nests.
J-165	4.4-52	Mitigation Measure BIO-4: Develop and Implement a Restoration Plan for Blue Oak Woodland Habitat. HWT, PG&E, and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat. For any temporary impact, all disturbed soils and new fill in this habitat shall be revegetated with site-appropriate native species. For any permanent impact, blue oak woodland habitat shall be mitigated at a ratio of 1.1:1 (replacement to impact). Blue oak trees and valley oak trees that are removed shall be mitigated at a ratio that shall be determined based on the diameter at breast height (dbh) of the tree, as described further below.	Woody vegetation would be prohibited along the underground corridor. Revise text as follows: HWT, PG&E, and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat. For any temporary impact, all disturbed soils and new fill in this habitat shall be revegetated with site-appropriate native species <u>compatible with the facility.</u> For any permanent impact, blue oak woodland habitat shall be mitigated at a ratio of 1.1:1 (replacement to impact). Blue oak trees and valley oak trees that are removed shall be mitigated at a ratio that shall be determined based on the diameter at breast height (dbh) of the tree, as described further below.
J-166	4.4-52	Mitigation Measure BIO-4: Develop and Implement a Restoration Plan for Blue Oak Woodland Habitat. Blue oak woodland restoration or compensation may be completed at the work area, in the vicinity, or at a conservation bank with a service area that covers the Proposed Project or selected alternative. Revegetated or restored areas shall be maintained and monitored to ensure a minimum of 65 percent survival of woody plantings after 5 years .	Revise text as follows: Blue oak woodland restoration or compensation may be completed at the work area, in the vicinity, or at a conservation bank with a service area that covers the Proposed Project or selected alternative. Revegetated or restored areas shall be maintained and monitored to ensure a minimum of 65 percent survival of woody plantings after 5 years <u>or 75 percent survival of woody plantings after 3 years.</u>
J-167	4.4-53	Implementation of APM HAZ-1 would prevent the introduction of hazardous materials into natural communities,	APM's do not apply to O&M activities. PG&E would implement BMP's during O&M activities. Revise text as follows: Implementation of <u>APM HAZ-1 standard BMPs</u> would prevent the introduction of hazardous materials into natural communities,
J-168	4.4-56	Although special-status plants are not likely to be encountered, if such species are discovered within the proposed work area and cannot be avoided impacts would be significant.	Revise text as follows: Although special-status plants are not likely to be encountered, if such species are discovered within the proposed work area and cannot be avoided impacts <u>would have the potential to be</u> significant.
J-169	4.4-56	Although the northern reasonably foreseeable distribution line segment would cross Dry Creek, the distribution line would be installed within the median of SR 46	Revise text as follows: Although the northern reasonably foreseeable distribution line segment would cross Dry Creek, the distribution line would be <u>installed within the median of parallel the existing SR 46 right-of-way.</u>
J-170	4.4-60	The Alternative PLR-1A route would cross several major surface water bodies (i.e., Dry Creek, Huer Huero Creek), as well as several unnamed drainages	Indirect effects to water quality are not discussed under criterion B. The discussion should analyze potential indirect effects to water quality and reference applicable APMs similar to the discussion under criterion C.
J-171	4.4-62	The Alternative PLR-1C route would parallel Estrella River for a portion of its length and would cross Huer Huero Creek, as well as several unnamed drainages.	Indirect effects to water quality are not discussed under criterion B. The discussion should analyze potential indirect effects to water quality and reference applicable APMs similar to the discussion under criterion C.
J-172	4.4-63	General comment regarding Alternative PLR-3: Strategic Undergrounding (Option 1 & 2)	The potential for wildlife entrapment would increase under this alternative and should be addressed.
J-173	4.4-58	While the operation and maintenance activities at the substation would not be anticipated to impact special-status species, the 230 kV interconnection would have potential to impact special-status birds (e.g., via electrocution or collision) if not designed properly, which would be a significant impact. To avoid or minimize these effects, Mitigation Measure BIO-3 would be implemented, which would require that the 230 kV interconnection follow APLIC guidelines for avian protection. Implementation of this mitigation measure would reduce effects on special-status species during operation to a level that is less than significant. Overall, impacts under significance criterion A would be less than significant with mitigation.	APLIC does not have guidelines for high voltage lines in the 230kV range, since the spacing between higher voltage lines is such that it does not present a substantial threat of bird electrocution, even for larger species. Because there are no guidelines, there is no way to design the 230kV interconnection to APLIC standards. Subsequently, the 230kV interconnection should not be considered as a threshold for significant impacts. Revise text as follows: While the operation and maintenance activities at the substation would not be anticipated to impact special-status species, the 230 kV interconnection would have potential to impact special-status birds (e.g., via electrocution or collision) if not designed properly, which would be a significant impact. To avoid or minimize these effects, Mitigation Measure BIO-3 would be implemented, which would require that the 230 kV interconnection follow APLIC guidelines for avian protection. Implementation of this mitigation measure would reduce effects on special-status species during operation to a level that is less than significant. Overall, impacts under significance criterion A would be less than significant with mitigation.
J-174	4.4-61	One important difference is that in starting at the Bonel Ranch Substation Site (Alternative SS-1), Alternative PLR-1C would parallel the Estrella River at the outset, where there would be increased potential for special-status species to be present, including nesting birds, which may use the Estrella River corridor.	Special-status species commonly refers to listed, candidate, and special-concern species but the term does not normally encompass all nesting birds. Revise text as follows: One important difference is that in starting at the Bonel Ranch Substation Site (Alternative SS-1), Alternative PLR-1C would parallel the Estrella River at the outset, where there would be increased potential for special-status species to be present, including nesting birds, which may use the Estrella River corridor.

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J-175	4.4-63 to 4.4-64	Strategic undergrounding. “Alternative PLR-3 would permanently impact 0.52 acre and temporarily impact 3.44 to 3.51 acres of blue oak woodland habitat, which is a sensitive natural community. These impacts would be considered significant. To mitigate the impacts to blue oak woodland, Mitigation Measure BIO-4 would be implemented, which would require development and implementation of a blue oak woodland habitat restoration plan. This would include replacement of any removed trees and would reduce impacts on blue oak woodland from Alternative PLR-3 to a level that is less than significant.”	Revise for clarity of impacts. Revise as follows: Alternative PLR-3 would permanently impact 0.52 acre and temporarily impact 3.44 to 3.51 acres of blue oak woodland habitat, which is a sensitive natural community. <u>In addition, up to 47 oak trees would be required to be removed permanently.</u> These impacts would be considered significant. To mitigate the impacts to blue oak woodland, Mitigation Measure BIO-4 would be implemented, which would require development and implementation of a blue oak woodland habitat restoration plan. This would include <u>replacement-off-site mitigation</u> of any removed trees and would reduce impacts on blue oak woodland from Alternative PLR-3 to a level that is less than significant <u>with mitigation</u> .
J-176	4.4-64	Indirect effects are not discussed under criterion B. Where are the APMs & MMs to address indirect impacts similar to impacts under significance criterion C? (e.g., erosion and sedimentation, fugitive dust, release of hazardous materials) would be minimized through implementation of APMs HYDRO-1, HAZ-1, GEN-1, and AIR-3?	Indirect effects to water quality are not discussed under criterion B. The discussion should analyze potential indirect effects to water quality and reference applicable APMs similar to the discussion under criterion C.
J-177	4.4-65	By undergrounding the 70 kV power line, the alternative would avoid or minimize impacts on special-status bird species (e.g., golden eagle), which would further the goals and policies in the County’s and City’s General Plans to avoid or minimize impacts on biological resources.	The transition stations and riser poles at each end of the underground line would include above-ground electrified components that could pose an electrocution hazard to birds. Because of this consideration, MM BIO-3 will be implemented for criterion A, and so MM BIO-3 should be implemented here for this criterion or this statement should be removed. If the statement is to remain, revise text as follows: By undergrounding the 70 kV power line, the alternative would avoid or minimize impacts on special-status bird species (e.g., golden eagle), which would further the goals and policies in the County’s and City’s General Plans to avoid or minimize impacts on biological resources.
J-178	4.4-66	The substation under Alternative SE-1A would not directly impact riparian habitat or the drainage features to the south of the site. Alternative SE-1A would not directly affect any of the vegetation communities considered sensitive by CDFW (i.e., blue oak woodland, central coastal scrub, Central Coast cottonwood-willow riparian forest, coastal and valley freshwater marsh, and sandy wash). Because the individual oak trees on the site would not be part of a larger sensitive natural community, these impacts would not be significant and would not require mitigation. As a result, impacts under significance criterion B would be less than significant.	Indirect effects to water quality are not discussed under criterion B. The discussion should analyze potential indirect effects to water quality and reference applicable APMs similar to the discussion under criterion
J-179	4.4-68	Alternative SE-PLR-2 route would parallel and cross Spanish Camp Creek at South River Road. The route also would pass through areas of blue oak woodland (PG&E 2019), which is considered a sensitive natural community by the City of Paso Robles and CDFW.	Indirect effects to water quality are not discussed under criterion B. The discussion should analyze potential indirect effects to water quality and reference applicable APMs similar to the discussion under criterion
J-180	4.4-64	The undergrounded power line under Alternative PLR-3 would have no potential to cause substantial adverse effects (e.g., electrocution, collision) to special-status birds; however, the transition stations and riser poles at each end of the underground line would include above-ground electrified components that could pose an electrocution hazard to birds, which would be a significant impact.	Revise text as follows: The undergrounded power line under Alternative PLR-3 would have no potential to cause substantial adverse effects (e.g., electrocution, collision) to special-status birds; however, the transition stations and riser poles at each end of the underground line would include above-ground electrified components that could pose an electrocution hazard to birds, which would <u>only</u> be a significant impact <u>if not designed to raptor-safe standards</u> .
J-181	4.4-61	Other operation and maintenance activities would not be expected to substantially affect special-status invertebrates, amphibians, reptiles, or mammals. Overall, impacts under significance criterion A would be less than significant with mitigation.	The underground route consists of much higher ground disturbance and therefore higher potential to impact special-status wildlife during construction; this does not seem clear in this description.
J-182	4.4-66	To avoid or minimize these effects, Mitigation Measure BIO-3 would be implemented, which would require that the 230 kV interconnection follow APLIC guidelines for avian protection.	APLIC does not have a recommendation for this 230 voltage (construction spacing). Only the 2012 collision manual would apply.
J-183	4.4-68	This risk would be elevated for the Alternative SE-PLR-2 route given the presence of several known golden eagle nests within proximity to this route.	Eagles have large territories; this statement is speculative, especially with raptor-safe construction. Any power line has the potential to impact birds by collision. Revise text as follows: This risk would be elevated for the Alternative SE-PLR-2 route given the presence of several known golden eagle nests within proximity to this route.
J-184	4.4-70	There are several oak trees present on potential FTM Site 6, as well as on potential FTM Sites 3 and 7, which could require removal depending on the ultimate size of the BESSs. However, removal of these isolated trees would not constitute a substantive impact to a sensitive natural community.	Other alternatives have mentioned oak removals at very low levels (3 trees) and indicated that this was a significant impact; this statement indicates that oak tree removal is not substantive. There is no mention of mitigation for the removal of oak trees. This analysis should be treated the same as the other locations when it comes to oak tree removal.
J-185	Cultural Resources		
	4-5.1	This section describes the potential impacts of the Proposed Project, reasonably foreseeable distribution components, and alternatives related to cultural resources. Section 15064.5(a)(3) of the CEQA Guidelines defines cultural resources as objects, buildings, structures, sites, areas, places, records or manuscripts that are determined historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Relative to the Proposed Project, these resources can be further described as prehistoric archaeological sites, historic-era archaeological sites, historic buildings and structures, landscapes, districts, and linear features. Prehistoric archaeological sites are places where Native Americans lived or carried out activities during the prehistoric period, which is generally prior to the late 1700s for the region. Historic-era archaeological sites reflect the activities of people after initial exploration and settlement in the region by the Spanish during the late 1700s, and later by others. Native American sites can also reflect the historic era. Prehistoric and historic-era sites contain artifacts, cultural features, subsistence remains, and human burials.	Please add the following text to the end of the paragraph: <u>Although this section generally discusses cultural resources, it is primarily focused on archaeological and built environment resources. Tribal cultural resources, which can include archaeology and built environment, but are also comprised of a wider range of resources of concern to Native Americans with ties to the project area, are discussed in Chapter 4.18.</u>

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J-186	4.5-1	<p>California Environmental Quality Act</p> <p>Section 21083.2 of CEQA (PRC Section 21000 et seq.) requires that the lead agency determine whether a project may have a significant effect on unique archaeological resources. A unique archaeological resource is defined in CEQA as an archaeological artifact, object, or site about which it can be clearly demonstrated that there is a high probability that it:</p> <ul style="list-style-type: none">• Contains information needed to answer important scientific research questions, and there is demonstrable public interest in that information;• Has a special or particular quality, such as being the oldest of its type or the best available example of its type; or• Is directly associated with a scientifically recognized important prehistoric or historic event or person. <p>Measures to conserve, preserve, or mitigate and avoid significant effects on these resources are also provided under CEQA Section 21083.2. CEQA Guidelines Section 15064.5 also provides criteria and processes/procedures for identifying and minimizing harm to historical resources.</p>	<p>Revise text as follows:</p> <p>Unique Archaeological Resources-California Environmental Quality Act</p> <p>In addition to the protection of Historic Resources, Section 21083.2 of CEQA (PRC Section 21000 et seq.) requires that the lead agency determine whether a project may have a significant effect on unique archaeological resources. A unique archaeological resource is defined in CEQA as an archaeological artifact, object, or site about which it can be clearly demonstrated that there is a high probability that it:</p> <ul style="list-style-type: none">• Contains information needed to answer important scientific research questions, and there is demonstrable public interest in that information;• Has a special or particular quality, such as being the oldest of its type or the best available example of its type; or• Is directly associated with a scientifically recognized important prehistoric or historic event or person. <p>Measures to conserve, preserve, or mitigate and avoid significant effects on these resources are also provided under CEQA Section 21083.2. CEQA Guidelines Section 15064.5 also provides criteria and processes/procedures for identifying and minimizing harm to historical resources. Although historical resources and unique archaeological resources are discussed separately within the CEQA guidelines, in practice, the criteria overlap sufficiently that it is difficult to conceive of a unique archaeological resource that would not also be a historical resource.</p>
J-187	4-5.2	<p>California Health and Safety Code Section 7050.5</p> <p>Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the county coroner can determine whether the remains are those of a Native American. If the remains are determined to be a Native American, the Coroner must then contact the Native American Heritage Commission (NAHC).</p>	<p>Revise text as follows:</p> <p>California Health and Safety Code Section 7050.5</p> <p>Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the county coroner can determine whether the remains are those of a Native American. If the remains are determined to be a Native American, the Coroner must then contact the Native American Heritage Commission (NAHC). Under Section 5097.98 of the Public Resources Code (PRC), the NAHC will determine the Most Likely Descendants (MLD) and notify them of the discovery. As per Section 5097.98 (a-b), the landowner (and presumably the project proponent and CPUC, though proponents and lead agencies are not discussed within the PRC) will confer with the MLD to determine appropriate treatment of the human remains.</p>
J-188	4-5.2	<p>California Register of Historical Resources</p> <p>The California Register of Historical Resources (CRHR) is established in PRC Section 5024.1. The register lists all California properties considered to be significant historical resources, including all properties listed in, or determined to be eligible for listing, the National Register of Historic Places (NRHP). Resources listed in, or eligible for listing in, the CRHR are referred to as <i>historical resources</i>. The criteria for listing in the CRHR include resources that:</p> <ol style="list-style-type: none">1. Are associated with the events that have made a significant contribution to the broad patterns of California's history and cultural heritage;2. Are associated with the lives of persons important in our past;3. Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values; or4. Have yielded, or may be likely to yield, information important in prehistory or history. <p>CCR Section 4852 sets forth the criteria for eligibility as well as guidelines for assessing historical integrity and resources that have special considerations</p>	<p>Please move this section to precede the Unique Archaeological Resources Section, as modified above, and add the following text:</p> <p>California Register of Historical Resources</p> <p>Under CCR Section 21084.1: "A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." A historical resource is defined as "a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1..."</p> <p>The California Register of Historical Resources (CRHR) is established in PRC Section 5024.1. The register lists all California properties considered to be significant historical resources, including all properties listed in, or determined to be eligible for listing, the National Register of Historic Places (NRHP). Resources listed in, or eligible for listing in, the CRHR are referred to as <i>historical resources</i>. The criteria for listing in the CRHR include resources that:</p> <ol style="list-style-type: none">1. Are associated with the events that have made a significant contribution to the broad patterns of California's history and cultural heritage;2. Are associated with the lives of persons important in our past;3. Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values; or4. Have yielded, or may be likely to yield, information important in prehistory or history. <p>CCR Section 4852 sets forth the criteria for eligibility as well as guidelines for assessing historical integrity and resources that have special considerations.</p>
J-189	4.5-8	The cedar utility pole is located 9 feet southwest of the well and is about 256 feet tall	<p>Revise text as follows:</p> <p>The cedar utility pole is located 9 feet southwest of the well and is about 256 feet tall</p>
J-190	4.5-14	The seven archaeological isolates were not indicative of larger sites and thus are not considered eligible for listing in the CRHR or unique archaeological resources; however, their presence attests to the widespread general use of the region by the indigenous population during the pre-historic and historic past. As noted above, coordination with Native American tribes in the area indicated that the areas of the Proposed Project region near surface waterbodies, in particular (e.g., Dry Creek, and Estrella and Salinas rivers), are sensitive for cultural resources. Of the 11 built environment resources, only the Johnson House appears to be eligible for listing on the CRHR. This house is situated off Union Road along the Proposed Project's 70 kV power line route near the point where the power line would cross SR 46.	<p>The reasoning provided in the document that the tribes indicate higher sensitivity at the rivers is sufficient for calling out the sensitivity for Tribal Cultural Resources. To call it out for general archeological sensitivity requires more explanation.</p> <p>Revise text as follows:</p> <p>The seven archaeological isolates were not indicative of larger sites and thus are not considered eligible for listing in the CRHR or unique archaeological resources; however, their presence attests to the widespread general use of the region by the indigenous population during the pre-historic and historic past. As described earlier in the chapter, previous activities near the rivers and a tendency for people to settle near perennial water sources increase the likelihood of archaeological sites in the vicinity of rivers and creeks. As noted above, coordination with Native American tribes in the area indicated that the areas of the Proposed Project region near surface waterbodies, in particular (e.g., Dry Creek, and Estrella and Salinas rivers), are sensitive for tribal cultural resources. Of the 11 built environment resources, only the Johnson House appears to be eligible for listing on the CRHR. This house is situated off Union Road along the Proposed Project's 70 kV power line route near the point where the power line would cross SR 46.</p>

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J-191	4.5-14	Based on the buried site sensitivity analysis described in Section 4.5.3, construction of new 70 kV power line poles across Huer Huero Creek near Union Road would also have potential to encounter preserved buried cultural deposits in the Holocene-aged valley floor and stream channel alluvium. In particular, installation of concrete pier foundations for poles, which will reach depths of up to 20 feet, would have the greatest potential to encounter/impact buried resources. Minor grading for structure locations, pull and tension sites, and access roads could also reveal buried archaeological materials.	<p>This is not consistent with the findings of the buried site sensitivity analysis in Section 4.5.3. The analysis indicates that deeper excavation is likely to hit culturally sterile landforms that predate human occupation of the Americas. Holocene-aged sediments closer to the surface are more likely to contain archeological resources. Therefore, the likelihood of the pole footing excavation or more minor grading to encounter resources is similar.</p> <p>Revise text as follows:</p> <p>Based on the buried site sensitivity analysis described in Section 4.5.3, construction of new 70 kV power line poles across Huer Huero Creek near Union Road would also have potential to encounter preserved buried cultural deposits in the Holocene-aged valley floor and stream channel alluvium. In particular, installation of concrete pier foundations for poles, which will reach depths of up to 20 feet, would have the greatest potential to encounter/impact buried resources. Minor grading for structure locations, pull and tension sites, and access roads could also reveal buried archaeological materials.</p>
J-192	4-5.16	<p>Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6.</p> <p>The following actions by the CPUC are designed to augment the APMs provided by the Project proponents to ensure that construction impacts to cultural resources are mitigated to a level of less than significant:</p> <p>a. The CPUC shall appoint a qualified archaeologist to represent the interests of the CPUC and oversee the implementation of the APMs with regard to archaeological resources on their behalf. The archaeologist shall meet the U.S. Secretary of the Interior’s Professional Qualifications Standards for Archeology.</p>	<p>This portion of the measure refers to an action taken by the CPUC, not the Applicants. Therefore, it should be removed.</p> <p>Revise text as follows:</p> <p>The following actions by the CPUC are designed to augment the APMs provided by the Project proponents to ensure that construction impacts to cultural resources are mitigated to a level of less than significant:</p> <p>a. The CPUC shall appoint a qualified archaeologist to represent the interests of the CPUC and oversee the implementation of the APMs with regard to archaeological resources on their behalf. The archaeologist shall meet the U.S. Secretary of the Interior’s Professional Qualifications Standards for Archeology.</p>
J-193	4-5.16	<p>Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6.</p> <p>b. The Project proponents shall make every effort to design the project to avoid known eligible or potentially eligible cultural resources for the Proposed Project, reasonably foreseeable distribution components, and alternatives. A 50-foot buffer, using flagging, rope, tape, or fencing, shall be established around the boundary of each respective resource, which shall be designated an environmentally sensitive area. If the proponent engineers determine that the project cannot be designed to avoid known cultural resources and construction will encroach upon the resource buffer, construction monitoring by an archaeologist shall be required.</p>	<p>This portion of the measure is already required by APM Cul-4 and should therefore be removed.</p> <p>Revise text as follows:</p> <p>b. The Project proponents shall make every effort to design the project to avoid known eligible or potentially eligible cultural resources for the Proposed Project, reasonably foreseeable distribution components, and alternatives. A 50-foot buffer, using flagging, rope, tape, or fencing, shall be established around the boundary of each respective resource, which shall be designated an environmentally sensitive area. If the proponent engineers determine that the project cannot be designed to avoid known cultural resources and construction will encroach upon the resource buffer, construction monitoring by an archaeologist shall be required.</p>
J-194	4-5.16	<p>Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6.</p> <p>A Native American representative from a consulting tribe shall be retained to monitor the construction activities if the resource is a Native American archaeological site.</p>	<p>The CPUC performed AB 52 consultation, and PG&E was not present. Given local tribal territories and desires, it is inappropriate for PG&E to choose a monitor, that should be done by the CPUC.</p> <p>Revise text as follows:</p> <p>A Native American representative from a consulting tribes <u>identified by the CPUC</u> shall be retained to monitor the construction activities if the resource is a Native American archaeological site. The Project proponent will be responsible for communicating project schedules and needs to the Native American monitor and/or tribe, but it is the responsibility of the tribe to ensure that the monitor is on site when called for, and work may proceed if the Project proponent has provided adequate notice of work.</p>
J-195	4-5.17	<p>Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6.</p> <p>The archaeological monitor shall notify the Project’s cultural resources principal investigator immediately, and the principal investigator shall, in turn, notify the CPUC and their appointed professional archaeologist. If an archaeological monitor is not present at the time of the find, Project proponent’s environmental inspector or construction supervisor shall make the notifications. The Project’s cultural resources principal investigator shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment.</p>	<p>Revise text as follows:</p> <p>The archaeological monitor shall notify the Project’s cultural resources principal investigator immediately, and the principal investigator shall, in turn, notify the CPUC and their appointed professional archaeologist. If the discovery happens during work being performed by PG&E, the PG&E cultural resource specialist (CRS) must also be notified alongside the CPUC. PG&E’s CRSs meet Secretary of the Interior Qualifications as archaeological principal investigators, and have extensive experience performing cultural resources studies within the electrical utility environment. If an archaeological monitor is not present at the time of the find, Project proponent’s environmental inspector or construction supervisor shall make the notifications. The Project’s cultural resources principal investigator shall inspect the find within 24 hours of discovery and notify the CPUC, and, if on a PG&E portion of the project, PG&E’s CRS, of their initial assessment.</p>
J-196	4.5-17	<p>Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6.</p> <p>Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.</p>	<p>Add the following text:</p> <p>Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones. If the assessment of significance can be made by the cultural resources principal investigator based on a small sample of discovered material, then the CPUC must respond in writing within 48 hours, or it may be assumed that the CPUC concurs with the principal investigator’s findings. If analysis of the discovery requires an in-depth study (i.e., eligibility excavations, etc.) then the CPUC must respond in writing within 1 week of receipt of the principal investigator’s report, or it may be assumed that the CPUC concurs with the principal investigator’s findings. If the resource is found during PG&E work, or PG&E work will be impacted by the presence or discovery of the resource, then the principal investigator will consult with the PG&E CRS throughout the assessment and, if appropriate, treatment process.</p>

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J-197	4-5.17	Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6. The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System. Work in the area may commence, at the direction of the CPUC, upon completion of treatment and under the direction of the qualified archaeologist.	Revise text as follows: The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System. <u>The CPUC must provide either concurrence or comments in writing within 1 week of receiving the report. A lack of response from the CPUC may be taken as concurrence with the sufficiency of the treatment documented within the report.</u> Work in the area may commence, at the direction of the CPUC, following concurrence from the CPUC that the work performed was sufficient, upon completion of treatment and under the direction of the qualified archaeologist. <u>Should the resource also be identified as a tribal cultural resource, then measures outlined in Section 4.18 will also apply if resource-specific measures identified during the resource-specific consultation do not supersede them.</u>
J-198	4-5.18	However, there would be potential to encounter buried human remains in any area the Proposed Project plans disturbance, especially where there would be deep excavations for pole and tower foundations.	This statement contradicts the buried site analysis in this chapter in which concluded deeper excavation is more likely to encounter resources, which is not true in this geological environment, where deeper excavation is likely to encounter deposits that pre-date humans. Revise text as follows: However, there would be potential to encounter buried human remains in any area the Proposed Project plans disturbance, especially where there would be deep excavations for pole and tower foundations.
J-199	4-5.18	The most likely descendant would then inspect the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of the human remains and any items associated with Native American burials.	The statement seems to indicate that the MLD could only recommend excavation, which is not correct according to the law. Revise text as follows: The most likely descendant would then inspect the site within 48 hours of notification and may recommend <u>measures that they feel are appropriate, potentially including</u> scientific removal and nondestructive analysis of the human remains and any items associated with Native American burials.
J-200	4-5.19	Mitigation Measure CR-2: Comply with the Legal Requirements of PRC 5097.98. In turn, the principal investigator shall immediately notify the County coroner, as well as the CPUC and their appointed professional archaeologist.	Revise text as follows: In turn, the principal investigator shall immediately notify the County coroner, as well as the CPUC and their appointed professional archaeologist <u>and, if the discovery is made during PG&E activities, the PG&E CRS.</u>
J-201	4-5.19	Mitigation Measure CR-2: Comply with the Legal Requirements of PRC 5097.98. The most likely descendent will complete inspection of the site and make recommendations or preferences for treatment within 48 hours of being granted access to the site. Construction will not continue in the protected area until treatment of the remains has been resolved and notice is provided by the CPUC archaeologist to resume work in the area.	Revise text as follows: The most likely descendent will complete inspection of the site and make recommendations or preferences for treatment within 48 hours of being granted access to the site. <u>As per Section 5097.98 of the PRC, the MLD must also work with the landowner to determine appropriate treatment of remains.</u>
J-202	4-5.19	Mitigation Measure CR-2: Comply with the Legal Requirements of PRC 5097.98. Construction will not continue in the protected area until treatment of the remains has been resolved and notice is provided by the CPUC archaeologist to resume work in the area.	Time limits are valuable as they allow PG&E to know clearly when something is complete, as opposed to when it is ongoing, and it allows. Revise text as follows: Construction will not continue in the protected area until treatment of the remains has been resolved and notice is provided by the CPUC archaeologist to resume work in the area. <u>which the CPUC must provide within 24 hours of resolution. If an MLD is not identified by the NAHC, or if the MLD and the landowner cannot reach agreement, then the provisions of PRC Section 5097.98 will be put into effect.</u>
J-203	4-5.20	Mitigation Measure CR-3: Complete Cultural Resources Studies, Evaluate Resources for Significance, and Implement Avoidance and Minimization Measures. The archaeological and built environment resources surveys shall be completed prior to construction of the respective components and prior to final design.	Revise text as follows: The archaeological and built environment resources surveys shall be completed prior to construction of the respective components and prior to final design. <u>The CPUC must either comment on or concur with the findings of the report within 30 days of receipt. Lack of response within 30 days may be considered concurrence.</u>
J-204	4-5.20	Mitigation Measure CR-3: Complete Cultural Resources Studies, Evaluate Resources for Significance, and Implement Avoidance and Minimization Measures. The pedestrian survey shall include systematic surface inspection with transects spaced at 15-meter (approximately 50-foot) intervals, or less, and shall cover the entire site or alignment and a 100-foot buffer around the site or alignment.	Depending on the locations, 15 meter transects or less, while preferred, may not be possible or safe. Revise text as follows: The pedestrian survey shall include systematic surface inspection with transects spaced at 15-meter (approximately 50-foot) intervals; or less <u>where feasible and safe (owing to landform, paving, and previous construction). Where such transects are not feasible or safe, survey shall provide the most complete coverage possible either through wider transects (ex. on steep slopes near rivers) or opportunistic survey (ex.: locations where private property fences or buildings/pavement obscure the ground),</u> and shall cover the entire site or alignment and a 100-foot buffer around the site or alignment.
J-205	4-5.21	Mitigation Measure CR-3: Complete Cultural Resources Studies, Evaluate Resources for Significance, and Implement Avoidance and Minimization Measures. Archaeological sites found to contain human remains must be treated in accordance with the provisions of Section 7050.5 of the California Health and Safety Code (see APM CUL-4 and Mitigation Measure CR-2). Should any archaeological site be determined eligible for listing in the CRHR, and if Project proponent design engineers determine that any portion of the site that contributes to its eligibility cannot be avoided by construction, a data recovery program shall be necessary and a detailed data recovery plan shall be prepared by a qualified archaeologist per Mitigation Measure CR-1(b). The data recovery plan must be submitted and approved by the CPUC prior to implementation of the plan. The CPUC shall ensure that consulting tribes will have the opportunity to review the data recovery plan for any CRHR-eligible Native American site.	Revised text as follows: Archaeological sites found to contain human remains must be treated in accordance with the provisions of Section 7050.5 of the California Health and Safety Code (see APM CUL-4 and Mitigation Measure CR-2). <u>The CPUC and tribes must either comment on or concur with the findings of the report within 30 days of receipt. Lack of response within 15 days may be considered concurrence.</u> Should any archaeological site be determined eligible for listing in the CRHR, and if Project proponent design engineers determine that any portion of the site that contributes to its eligibility cannot be avoided by construction, a data recovery program shall be necessary and a detailed data recovery plan shall be prepared by a qualified archaeologist per Mitigation Measure CR-1(b). The data recovery plan must be submitted and approved by the CPUC prior to implementation of the plan. The CPUC shall ensure that consulting tribes will have the opportunity to review the data recovery plan for any CRHR-eligible Native American site. <u>The CPUC and tribes must either comment on or concur with the findings of the report within 30 days of receipt. Lack of response within 15 days may be considered concurrence.</u>

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4-5.21	For any artifacts removed during project evaluation or data recovery excavations, the Project proponent’s qualified archaeologist must provide for the curation of such artifact(s).	Tribes often ask for reburial rather than curation. Is that feasible for the CPUC?
4-5-22	The potential would be slightly elevated under Alternative SS-1 due to the site’s location close to the Estrella River, which Native American tribes in the area have indicated is sensitive for cultural resources.	Revise text as follows: The potential would be slightly elevated under Alternative SS-1 due to the site’s location close to the Estrella River, which <u>both general archaeological practice and the advice of</u> Native American tribes in the area indicated is sensitive for cultural resources.
4-5-23	Mitigation Measure CR-3 would be applied to ensure that avoidance and minimization measures are implemented for these resources. Because the Alternative PLR-1A route has already been subject to a pedestrian archaeological survey, this would not be required under Mitigation Measure CR-3.	This statement is only partially correct. Portions of PLR-1 (all versions) were surveyed, not the entire line. Revise text as follows: Mitigation Measure CR-3 would be applied to ensure that avoidance and minimization measures are implemented for these resources and that the portions of the Alternative PLR-1C alignment not previously surveyed are subjected to a pedestrian archaeological survey. Because the Alternative PLR-1A route has already been subject to a pedestrian archaeological survey, this would not be required under Mitigation Measure CR-3.
4-5-24	Additionally, only a portion of the alignment was surveyed for built environment resources and several of the built environment resources that were identified along the alignment were not evaluated for significance. Thus, Alternative PLR-1C would result in significant impacts absent implementation of mitigation measures.	This is only true if the resources are both present and found to be eligible. Changing the language to indicate that it may cause impacts is appropriate. Revise text as follows: Additionally, only a portion of the alignment was surveyed for built environment resources and several of the built environment resources that were identified along the alignment were not evaluated for significance. Thus, Alternative PLR-1C would <u>may</u> result in significant impacts absent implementation of mitigation measures.
4-5-25	Construction of Alternative SE-1A would have similar potential to encounter buried human remains as the proposed Estrella Substation. Implementation of APM CUL-4 would require that HWT and PG&E follow protocols that are consistent with those outlines in California Health and Safety Code Section 7050.5, but would not reduce this impact to a level of less than significant.	Revise text as follows: Construction of Alternative SE-1A would have similar potential to encounter buried human remains as the proposed Estrella Substation. Implementation of APM CUL-4 would require that HWT and PG&E follow protocols that are consistent with those outlines in California Health and Safety Code Section 7050.5, but would not reduce this impact to a level of less than significant.
4-5.26	Coordination with Native American tribes indicated that the Santa Ysabel Ranch area (through which the Alternative SE-PLR-2 alignment would pass) is sensitive for cultural resources.	This requires more explanation. Did they indicate that it is sensitive for tribal cultural resources, which includes a wide range of resources such as landscapes, ceremonial area, plant gathering, etc.? If so, then by AB 52, they would be the people with the knowledge, so that’s fine, but this should specifically say that it means sensitivity for tribal cultural resources If this means cultural resources generally, including archeological and built environment, then some explanation is necessary. Someone saying that an area is sensitive does not necessarily make it so, and the data on which that conclusion is based should be presented. As this same section indicates that monitoring would not be necessary here, this creates confusion. Again, if this is talking about TCRs, then there is no objection. If it is talking about other resources, an argument for that must be made.
Geology and Soils		
4-7-2	The 2012 International Building Code (IBC) (known as the Uniform Building Code prior to 2000) was developed by the International Conference of Building Officials (ICBO) and is used by most states, including California, as well as local jurisdictions to set basic standards for acceptable design of structures and facilities.	Revise to the current year of IBC (2018). Revise text as follows: The 2012 <u>2018</u> International Building Code (IBC) (known as the Uniform Building Code prior to 2000) was developed by the International Conference of Building Officials (ICBO) and is used by most states, including California, as well as local jurisdictions to set basic standards for acceptable design of structures and facilities.
4-7.3	Add after Public Resources Code 5097.5	Add the following text after the section on Public Resources Code 5097.5 <u>California Environmental Quality Act</u> <u>State guidelines for the implementation of CEQA, as amended March 29, 1999 (14 CCR Division 6, Chapter 3, 15000 et seq.) define procedures, types of activities, persons, and public agencies required to comply with CEQA. The guidelines include as one of the questions to be answered in the Environmental Checklist (Appendix G, Section V, Part c) the following: “Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?”</u> <u>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” (State CEQA Guidelines Appendix G). CEQA does not provide an explicit definition of a “unique paleontological resource,” but a definition is implied by comparable language within the act relating to archeological resources: “The procedures, types of activities, persons, and public agencies required to comply with CEQA are defined in: Guidelines for the Implementation of CEQA, as amended March 29, 1999” (14 CCR Chapter 3, 15000 et seq.).</u> <u>CEQA encourages the protection of all aspects of the environment by requiring state and local agencies to prepare multidisciplinary analyses of the environmental impacts of a proposed project, and to make decisions based on the findings of those analyses. Treatment of paleontological resources under CEQA is generally conducted according to guidance from the SVP or other agencies (BLM, etc.) and typically includes identification, assessment, and development of mitigation measures for potential impacts to significant or unique resources.</u> <u>Appendix G (Part V) of the State CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, which states, “a project will normally result in a significant impact on the environment if it will ... disrupt or adversely affect a paleontological resource or site or unique geologic feature, except as part of a scientific study.”</u>

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J-214	4.7-21	Paleontological resources include fossil remains, as well as fossil localities and rock or soil formations that have produced fossil material.	It is common for large formation to be only sensitive for paleontological resources within specific areas, and not sensitive overall. Revise text as follows: Paleontological resources include fossil remains, as well as fossil localities and rock or soil formations (or, in many cases, specific elements of facies of those formations) that have produced fossil material.
J-215	4.7-27	Specifically, the Proposed Project components would be designed in accordance with CPUC G.O. 174, which outlines minimum construction material requirements, calculations for foundations, and utility safety measures designed to withstand damage from ground rupture and seismic shaking. The proposed 70 kV power line structures also would be engineered to meet loads generated by forces such as seismic activity, as required by CPUC G.O. 95.	CPUC G.O. 95 does not mitigate for seismic activity, but for wind events at elevations below 3,000 feet mean sea level (msl), and for wind and ice events above 3,000 feet msl. Per American Society of Civil Engineers (ASCE) 74 – Guidelines for Electrical Transmission Line Structural Loading, “Transmission structures need not be designed for ground-induced vibrations caused by earthquake motion because, historically, transmission structures have performed well under earthquake events, and transmission structure loadings caused by wind/ice combinations and broken wire forces exceed earthquake loads” (ASCE 2020). Revise text as follows: Specifically, the Proposed Project components would be designed in accordance with CPUC G.O. 174, which outlines minimum construction material requirements, calculations for foundations, and utility safety measures designed to withstand damage from ground rupture and seismic shaking. The proposed 70 kV power line structures also would be engineered to meet loads generated by forces such as seismic activity, as required by CPUC G.O. 95.
J-216	4.7-29 to 4.7-30	Mitigation Measure GEO-1: Implement Recommendations in the Project Geotechnical Investigation Report. HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017). These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.	Revise text as follows: HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017), <u>as appropriate for the work, as well as any addenda or subsequent modifications to such reports to account for updated structural design criteria based on the latest California Building Code requirements.</u> These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.
J-217	4.7-36	Mitigation Measure GEO-2: Paleontological Resources Survey, Technical Report, and Construction Monitoring. The PRTR shall be prepared in accordance with standards provided by the Society for Vertebrate Paleontology and shall assign site sensitivity based on the potential fossil yield classification system utilized by the Bureau of Land Management.	Revise text as follows: The PRTR shall be prepared in accordance with standards provided by the Society for Vertebrate Paleontology and shall assign site sensitivity based on the potential fossil yield classification system utilized by the Bureau of Land Management, <u>and may use additional measures of paleontological sensitive as determined appropriate by the qualified paleontologist.</u>
J-218	4.7-39	As noted above, the majority of both Alternative PLR-3 route options would follow, and be installed within, existing roads; therefore, it is unlikely this undergrounding route would encounter unstable geologic/soil conditions or expansive soils such that construction or operation of Alternative PLR-3 could cause the soils beneath to be unstable. The Alternative PLR-3 alignment (both options) is relatively flat and in an area mapped as having low potential for liquefaction. Following the design and construction requirements in G.O. 95 and 174, as well as the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils.	Revise text as follows: As noted above, the majority of both Alternative PLR-3 route options would follow, and be installed within, existing roads; therefore, it is unlikely this undergrounding route would encounter unstable geologic/soil conditions or expansive soils such that construction or operation of Alternative PLR-3 could cause the soils beneath to be unstable. The Alternative PLR-3 alignment (both options) is relatively flat and in an area mapped as having low potential for liquefaction. Following the design and construction requirements in G.O. 128 95 and 174 , as well as the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils.
J-219	4.7-40	Nevertheless, implementation of APM GEN-1 and APMs PALEO-1 through PALEO-4 would avoid or minimize potential impacts to paleontological resources during construction, as described in Impact GEO-6.	Revise text as follows: Nevertheless, implementation of APM GEN-1 and APMs PALEO-1 through PALEO-4 would avoid or minimize potential impacts to paleontological resources during construction, as described in Impact GEO-6. <u>APM PALEO-3 should be implemented in a manner consistent with how it is proposed for construction within the Estrella Substation site.</u>
J-220	4.7-43	The FTM sites also are mapped as having low to moderate potential for liquefaction. In general, following the design and construction requirements in G.O. 95 and 174, as well as the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils.	G.O. 95 and G.O. 174 do not apply to battery storage structures Revise text as follows: The FTM sites also are mapped as having low to moderate potential for liquefaction. In general, following the design and construction requirements in G.O. 95 and 174, as well as the CBC would minimize hazards associated with unstable geologic units/soils or expansive soils.
J-221	Hazards and Hazardous Materials		
J-221	4.9-4	California Accidental Release Prevention program	The California Accidental Release Prevention program does not apply to substations
J-222	4.9-5	California Emergency Services Act The California Emergency Services Act (California Government Code, Chapter 7) established Cal EMA and created requirements for emergency response training and planning. Under this act, the State is required to develop a statewide toxic disaster contingency plan that can facilitate an California Public Utilities Commission 4.9. Hazards and Hazardous Materials Estrella Substation and Paso Robles Area Reinforcement Project Draft Environmental Impact Report 4.9-6 December 2020 Project 17.010 effective, multi-agency response to a situation in which toxic substances are dispersed in the environment so as to cause, or potentially cause, injury or death to a substantial number of persons or substantial harm to the natural environment (7 California Government Code, Section 8574.18). The California Emergency Services Act also requires the agency to develop and manage the California Hazardous Substances Incident Response Training and Education Program, which provides classes in hazardous substance response (7 California Government Code 8574.20). Under the California Emergency Services Act, Cal EMA would have the ability to provide an effective response to a catastrophic hazardous materials release.	The California Emergency Services Act does not apply to the project. Remove the following text: California Emergency Services Act The California Emergency Services Act (California Government Code, Chapter 7) established Cal EMA and created requirements for emergency response training and planning. Under this act, the State is required to develop a statewide toxic disaster contingency plan that can facilitate an California Public Utilities Commission 4.9. Hazards and Hazardous Materials Estrella Substation and Paso Robles Area Reinforcement Project Draft Environmental Impact Report 4.9-6 December 2020 Project 17.010 effective, multi-agency response to a situation in which toxic substances are dispersed in the environment so as to cause, or potentially cause, injury or death to a substantial number of persons or substantial harm to the natural environment (7 California Government Code, Section 8574.18). The California Emergency Services Act also requires the agency to develop and manage the California Hazardous Substances Incident Response Training and Education Program, which provides classes in hazardous substance response (7 California Government Code 8574.20). Under the California Emergency Services Act, Cal EMA would have the ability to provide an effective response to a catastrophic hazardous materials release.

J-223 J-224 J-225 J-226 J-227 J-228		<table><tr><th>Page</th><th>Draft EIR Language</th><th>Comments</th></tr><tr><td>4.9-31 and 4.9-32</td><td>Mitigation Measure HAZ-1. Prepare and Implement a Fire Prevention and Management Plan. For project or alternative components located within a very high or high fire hazard severity zone, HWT and PG&E shall prepare and implement a fire prevention and management plan. The document will address fire prevention measures that will be employed during the construction phases, identifying potential sources of ignition and detailing the measures, equipment, and training that will be provided to all site contractors. The fire prevention and management plan shall also address potential ignition risks during operation of the project or alternative components. Coordination with state and local fire agencies is required, as specified below, and the plan shall be submitted to the CPUC for final review and approval prior to start of construction. 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J-229 J-230 J-231 J-232 J-233 J-234 J-235 J-236		<table><tr><th>Page</th><th>Draft EIR Language</th><th>Comments</th></tr><tr><td>4.13-20</td><td><p>Mitigation Measure NOI- 2: Minimize Noise Impacts from Helicopters.</p><p>HWT and PG&E shall implement the following procedures for helicopter activities:</p><ul style="list-style-type: none">Public Notice. Residences and places of worship (e.g., The Cove) within 1450 feet from any location where helicopter activities may occur, including flight paths if applicable, shall be provided written notice at least 30 days prior to beginning helicopter activities to inform them of the schedule for helicopter use and potential noise disruptions. Methods for receptors to reduce noise in structures shall be included in the notice (i.e., closing doors and windows facing the alignment). The notice shall describe procedures for submitting any noise complaints during construction and provide a phone number for submitting such complaints, as required by MM NOI-1.Helicopter Hovering. Light/medium lift helicopters shall not operate closer than 1,450 feet from any receptors unless actively working at pole locations along the alignment. Helicopters may operate closer than these distances if all affected receptors agree in writing to a shorter distance. Prior to reducing the minimum distance from receptors, PG&E shall provide the CPUC with the names, contact information, and written agreements for all affected persons within the applicable distances. The written agreements shall clearly identify the anticipated helicopter noise levels, daily schedule, and duration of helicopter activities in the vicinity.Helicopter Landing Zones. Helicopter landing zones shall not be positioned closer than 1,450 feet from any receptor. Helicopters may land closer than these distances if all affected receptors agree in writing to allow a shorter distance.</td><td><p>As described in the comment letter, the FTA Transit Noise and Vibration Impact Assessment Manual, which contains guidelines for the evaluation of the significance of construction noise impacts, is for transit projects and should not be used to determine significance of the proposed utility project. The Proposed Project would comply with local noise ordinances; therefore, impacts will be less than significant and mitigation is not necessary. However, if MM NOI-1 is included, it should be modified since securing written permission from sensitive receptors is not feasible. In addition, light/medium lift helicopters will not exceed the FTA threshold of 90 dBA Leq(1hr), so MM NOI-1 should only apply to heavy lift helicopter operation.</p><p>Revise text as follows:</p><p>HWT and PG&E shall implement the following procedures for helicopter activities:</p><ul style="list-style-type: none">Public Notice. Residences and places of worship (e.g., The Cove) within 1450 <u>200</u> feet from any location where light/medium <u>heavy lift</u> helicopter activities may occur (limited to up to 10 pole replacements on the Reconductoring Segment), including flight paths if applicable, shall be provided written notice at least 30 <u>14</u> days prior to beginning helicopter activities to inform them of the schedule for helicopter use and potential noise disruptions. Methods for receptors to reduce noise in structures shall be included in the notice (i.e., closing doors and windows facing the alignment). 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Residences and places of worship (e.g., The Cove) within 1450 feet from any location where helicopter activities may occur, including flight paths if applicable, shall be provided written notice at least 30 days prior to beginning helicopter activities to inform them of the schedule for helicopter use and potential noise disruptions. Methods for receptors to reduce noise in structures shall be included in the notice (i.e., closing doors and windows facing the alignment). The notice shall describe procedures for submitting any noise complaints during construction and provide a phone number for submitting such complaints, as required by MM NOI-1.Helicopter Hovering. Light/medium lift helicopters shall not operate closer than 1,450 feet from any receptors unless actively working at pole locations along the alignment. Helicopters may operate closer than these distances if all affected receptors agree in writing to a shorter distance. 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J-237	4-18.7	As described in Section 4.5, “Cultural Resources,” a pedestrian archaeological survey (NEET West and PG&E 2017a) identified three previously unrecorded resources, one of which was a prehistoric lithic scatter (Site 36052-S-003) on the edge of a bluff near the Salinas River and the Proposed Project’s new 70 kV power line segment. For purposes of this analysis, this site is considered potentially CRHR-eligible, and thus is also considered to be a TCR, although none of the tribes contacted by the Applicants or the CPUC through the AB 52 process commented on this site. The pedestrian archaeological survey also identified a number of isolated prehistoric archaeological items, which are not CRHR-eligible, but attest to the widespread use of the Proposed Project area by ancient peoples. In particular, Dry Creek is known to have been used as a transportation corridor by Native Americans and the areas surrounding the Estrella and Salinas Rivers are considered sensitive for cultural resources.	<p>As per PRD Section 21074, the tribes must ascribe importance to a site for it to be TCR. As written, this reads as if the tribe is being told what they consider important, rather than them telling us what they consider important, which seems to violate the spirit of AB53.</p> <p>Revise text as follows:</p> <p>As described in Section 4.5, “Cultural Resources,” a pedestrian archaeological survey (NEET West and PG&E 2017a) identified three previously unrecorded resources, one of which was a prehistoric lithic scatter (Site 36052-S-003) on the edge of a bluff near the Salinas River and the Proposed Project’s new 70 kV power line segment. While none of the consulted tribes identified this site as a TCR, it is possible that they may do so in the future, and as such, the resource will be treated with appropriate respect and avoided. For purposes of this analysis, this site is considered potentially CRHR-eligible, and thus is also considered to be a TCR, although none of the tribes contacted by the Applicants or the CPUC through the AB 52 process commented on this site.The pedestrian archaeological survey also identified a number of isolated prehistoric archaeological items, which are not CRHR-eligible, but attest to the widespread use of the Proposed Project area by ancient peoples. In particular, Dry Creek is known to have been used as a transportation corridor by Native Americans and the areas surrounding the Estrella and Salinas Rivers are considered sensitive for cultural resources.</p>
J-238	4-18.7	Apart from the general information regarding sensitivity of certain areas for cultural resources, none of the tribes contacted by the CPUC identified known TCRs in the Proposed Project area. As such, it is unlikely that there are any significant above-ground known sites, features, places, or cultural landscapes, other than the prehistoric lithic scatter discussed above, that would be considered TCRs that could be impacted by the Proposed Project.	<p>Revise text as follows:</p> <p>Apart from the general information regarding sensitivity of certain areas for cultural resources, none of the tribes contacted by the CPUC identified known TCRs in the Proposed Project area. As such, it is unlikely that there are any significant above-ground known sites, features, places, or cultural landscapes, other than the prehistoric lithic scatter discussed above, that would be considered TCRs that could be impacted by the Proposed Project. .</p>
J-239	4-18-7	However, archaeological deposits may be buried and exposed during Proposed Project construction (in particular, during deep excavations for installation of pole foundations).	<p>This statement appears to contradict the buried site sensitivity analysis in Chapter 4.4, which found that deeper deposits generally preceded human occupation of the project area. This statement is also inconsistent with the TCR-1 measure, as it calls for monitoring to six feet in depth, but not deeper. The monitoring mitigation measures provided by the CPUC make sense for archeology, and PG&E does not object to them, but the rationale provided here and in Chapter 4.5 need to be consistent with the buried sensitivity analysis provided in Chapter 4.5.</p> <p>Revise text as follows:</p> <p>However, archaeological deposits may be buried and exposed during Proposed Project construction (in particular, during deep excavations for installation of pole foundations)</p>
J-240	4-18.7	APM CUL-5 would require that a tribal monitor is present for initial ground-disturbing activities in culturally sensitive areas, which would reduce potential for impacts to TCRs.	<p>Revise text as follows:</p> <p>APM CUL-5 would require that a tribal monitor is present for initial ground-disturbing activities in culturally sensitive areas, which would allow for the identification of potential TCRs and therefore reduce potential for impacts to TCRs.</p>
J-241	4-18.7	Additionally, APM GEN-1 would be implemented to ensure that construction workers are aware of the types of archaeological materials that could be encountered in situations when the tribal monitor may not be present (e.g., ground-disturbing activities away from sensitive locations) and the proper protocols to follow for discoveries.	<p>While true, this statement conflates TCRs with archeological sites.</p>
J-242	4.18-9	Mitigation Measure TCR-1: Tribal Monitoring and Treatment of Tribal Cultural Resources. Monitoring of ground disturbance would also occur in the vicinity of Santa Ysabel Ranch, which was identified as culturally sensitive by the tribe.	<p>Please confirm if defined as culturally sensitive, which may indicate a broad range of things, or archaeologically sensitive, which is much narrower. Knowing which was called for by the tribe would assist PG&E in knowing the types of resources that may be encountered and how to avoid them.</p>
J-243	4.18-9	Mitigation Measure TCR-1: Tribal Monitoring and Treatment of Tribal Cultural Resources. All TCRs unearthed by project activities shall be evaluated by the Applicants’ qualified cultural resources principal investigator and the tribal monitor or other tribal representative identified by the Xolon-Salinan Tribe. If the TCR cannot be avoided, a detailed archaeological treatment plan shall be developed and implemented by the Applicants’ cultural resources principal investigator. The CPUC shall ensure that the treatment plan shall developed with input from and agreed upon by the Xolon-Salinan Tribe per Mitigation Measure CR-1. The Xolon-Salinan Tribe will determine the disposition of any TCRs artifacts discovered during construction or artifacts resulting from execution of a treatment plan, such as, but not limited to, reburying in close proximity of the finds without scientific study, allowing scientific study before reburying the materials either near the origin of the find or in another protected place, or curation at a facility at an institution that meets the U.S. Secretary of the Interiors criteria for curation (36 CFR 79).	<p>This assumes that any TCRs identified will be archaeological in nature. If the tribe stated that they anticipated archaeological remains to be the only types of TCRs identified, then this is fine. However, if they did not specify that TCRs in this area would be archaeological, then this will be insufficient.</p>
J-244	4.19-5	PG&E provides electrical power to San Luis Obispo County, including the city of Paso Robles. PG&E generates electricity from the following sources: (1) PG&E-owned generators; (2) non-PG&E-owned generators within California; and (3) out-of-state generators.	<p>Revise text as follows:</p> <p>PG&E provides electrical power to San Luis Obispo County, including the city of Paso Robles. PG&E generates <u>provides</u> electricity from the following sources: (1) PG&E-owned generators; (2) non-PG&E-owned generators within California; and (3) out-of-state generators.</p>
J-245	4.19-16	Construction of the FTM BESSs under Alternative BS-2 would likely generate reduced quantities of solid waste compared to the proposed Estrella Substation. Although sizes of FTM BESSs are unknown and would depend on future load conditions, FTM BESSs would likely be smaller than the substation and involve less excavation and vegetation clearing.	<p>Construction of the FTM BESSs under Alternative BS-2 would likely generate reduced quantities of solid waste compared to the reasonably foreseeable distribution components proposed Estrella Substation. Although sizes of FTM BESSs are unknown and would depend on future load conditions, FTM BESSs would likely be smaller than the substation and involve less excavation and vegetation clearing.</p>
J-246	4.20-21	No new roads, fire breaks, or related additional infrastructure would need to be installed or maintained as a result of Alternative BS-2.	<p>This is incorrect. Depending on the sites selected, access roads may need to be constructed and maintained throughout the operation of the FTM facilities.</p>
J-247	Chapter 6 – other statutory considerations and cumulative impacts 6-13	Other alternatives, as well as the reasonably foreseeable distribution components, would have adverse aesthetic effects (related to the addition of utility infrastructure), although these effects would be less than significant on their own.	<p>This statement conflicts with the findings from the Aesthetics analysis. As described therein, the DEIR found significant impacts for SS-1, PLR-1A, and PLR-1C. Mitigation was identified to reduce impacts to less than significant. As such, these alternatives were not less than significant on their own.</p> <p>Revise as follows:</p> <p>Other alternatives, as well as the reasonably foreseeable distribution components, would have adverse aesthetic effects (related to the addition of utility infrastructure), although these effects would be less than significant or less-than-significant with mitigation on their own.</p>

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Appendix F – Mitigation Monitoring and Reporting Plan			
J-248	6-16	Other alternatives and the reasonably foreseeable distribution components would generate noise, but this would be less than significant on the project level.	Alternative SE-1A was determined in the Noise analysis to have significant impacts. Mitigation was identified to reduce impacts to less than significant levels. Revise text as follows: Other alternatives and the reasonably foreseeable distribution components would generate noise, but this would be less than significant <u>with mitigation</u> on the project level.
	Appendix F – Mitigation Monitoring and Reporting Plan		
J-249	F-6	These monitors shall provide daily reports/surveys that are entered into a field record environmental database employed by HWT and PG&E.	We have provided weekly reports to the CPUC in the past, but not recorded in an environmental database. If a database is used, PG&E and HWT will have separate databases. Revise as follows: These monitors shall provide daily reports/surveys that are entered into a field record environmental database employed by HWT and PG&E.
	F-11	Mitigation Measure AES-1. Use Landscaping, Design and Architectural Elements to Complement the Surrounding Visual Landscape. Incorporate drought- and fire-resistant native shrubs within the hardscape landscaping proposed in APM AES-1 between Union Road and the Estrella Substation. For alternative substation sites, incorporate drought- and fire-resistant shrubs between the adjacent roadway and the substation. Coordinate with CAL FIRE / County Fire Department to ensure that any shrubs used in landscaping adjacent to the substation do not substantially increase fire risk.	Revise text as follows: Incorporate drought- and fire-resistant native shrubs within the hardscape landscaping proposed in APM AES-1 between Union Road and the Estrella Substation <u>in accordance with the standards provided in PG&E's Wildfire Safety Inspection Program and Cal Fire's defensible space guidelines.</u> For alternative substation sites, incorporate drought- and fire-resistant shrubs between the adjacent roadway and the substation. Coordinate with CAL FIRE / County Fire Department to ensure that any shrubs used in landscaping adjacent to the substation do not substantially increase fire risk.
J-251	F-11	Mitigation Measure AES-1. Use Landscaping, Design and Architectural Elements to Complement the Surrounding Visual Landscape. At the substation, incorporate chain link fence slats using natural colors that are compatible with the surrounding area (i.e., green, light brown) in order to minimize visual contrast	In accordance with PG&E' standards, the 70 kV substation would include a heavy duty, tightly woven anti-climb mesh fabric with 0.5-inch diamonds installed on a chain-link fence to prevent toe hold climbing. Slat are not made that small; therefore, slats would not be compatible. The slats are also an issue due to fire hazard. PG&E has been removing slatted fences in some areas. The mesh fabric comes in galvanized grey that would blend in with the existing and proposed structures in the area. While you can see through the mesh when you look at the fence straight on, when you are at an angle to the fence all you see is the fabric and not the equipment behind it due to the tightness of the mesh. Remove this requirement in the mitigation measure. Revise text as follows: At the substation (<u>where practicable</u>), incorporate chain link fence slats using natural colors that are compatible with the surrounding area (i.e., green, light brown, <u>gray</u>) in order to minimize visual contrast
	F-11	Mitigation Measure AES-1. Use Landscaping, Design and Architectural Elements to Complement the Surrounding Visual Landscape. For all Proposed Project and alternative components, use materials and paint colors that are compatible with the surrounding area (i.e., dull grey, light brown, or green colors) in order to minimize visual contrast. Avoid the use of large expanses of reflective glazing, aluminum panels, and other materials not normally found in the environment. Use a dulled finish on power line and transmission structures.	Tubular steel poles and light duty steel poles are ordered with a dulled finish. Lattice steel towers that have a dulled finished need to be pre-ordered 6 months ahead of time and are priced at a premium. As such, PG&E's preference is to not have to purchase these special ordered structures. The conventional structures would dull over time. Power line conductors will be specular to make the power line more noticeable in appearance against the background landscape, and therefore more visible to small aircraft pilots that fly over the area. Specular conductor transitions to non-specular (i.e., becomes less shiny) in the course of a few seasons after installation. PG&E's standard design is to use galvanized structures and tubing in the substation to reduce corrosion, extend life, and maintain proper grounding. Revise text as follows: For all Proposed Project and alternative components (<u>not including the power line conductors, lattice steel towers, or substation structures</u>), use materials and paint colors that are compatible with the surrounding area (i.e., dull grey, light brown, or green colors) in order to minimize visual contrast. Avoid the use of large expanses of reflective glazing, aluminum panels, and other materials not normally found in the environment. Use a dulled finish on power line and transmission structures.
J-253	F-12	Mitigation Measure AES-1. AES-1. Use Landscaping, Design and Architectural Elements to Complement the Surrounding Visual Landscape. With respect to power line and transmission structures, balance the need to minimize visual contrast with ensuring that structures are visible to aircraft pilots and birds.	Mitigation Measure AES-1 also requires that all components be dulled. This requirement conflicts with this portion of the measure regarding balancing the need to minimize visual contrast with visibility. Given that certain components will not be dulled (as noted above), PG&E recommends removing this portion of the measure. Revise text as follows: With respect to power line and transmission structures, balance the need to minimize visual contrast with ensuring that structures are visible to aircraft pilots and birds.

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J-254	F-13	<p>Mitigation Measure AG-1: Provide Compensation for Loss of Agricultural Land.</p> <p>HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall contribute sufficient funds (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives. The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California through the use of agricultural conservation easements. The amount of HWT's and PG&E's contribution shall ensure the conservation of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by the Proposed Project or alternatives, based on the market price for the commensurate agricultural land at the time that the impacts occur.</p>	<p>Revise text as follows:</p> <p>HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall <u>finalize and effectuate any combination of the following as long as the total acreage in the aggregate equals the amount required by the conservation ratio specified below: either (1) contribute sufficient funds, in an amount equal to the fair market value (determined as of the date construction commenced) of each acre for which the contribution is made, (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives, or to another public agency or non-profit organization able to achieve long-term preservation of agricultural lands in San Luis Obispo County; and/or (2) enter into and record one or more conservation easements with landowners for specific farmland in San Luis Obispo County.</u> The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California through the use of agricultural conservation easements <u>and is one potential recipient of any contribution in clause (1) above.</u> The <u>acreage for which amount of</u> HWT's and PG&E's contributions <u>are made in clause (1) above, together with any acreage preserved through recorded conservation easements in clause (2) above, shall equal a minimum total ensure the conservation of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by their respective components associated with the</u> Proposed Project or alternatives, based on the market price for the commensurate agricultural land at the time that the impacts occur.</p>
J-255	F-14	<p>Mitigation Measure AG-2: Restore Agricultural Land Temporarily Impacted by Construction Activities.</p> <p>HWT or PG&E shall ensure that agricultural land temporarily impacted by construction activities is adequately restored following completion of construction to pre-project conditions. These include areas impacted from establishment of temporary staging and storage areas, installation of the underground fiber optic cable link, installation of the 230 kV interconnection structures, preparation and temporary use of pull sites and crossing guard structures, and preparation and use of helicopter landing zones. Restoration of sites will involve removing any rock or material imported to stabilize the site, replacement of topsoil, de-compacting any soil that has been compacted by heavy equipment, and re-planting of agricultural crops. The responsibility of performing these various tasks may be stipulated in an agreement between HWT or PG&E, and the landowner(s) completed for the Proposed Project or alternatives. If a landowner is better equipped or prefers to replant crops or perform other tasks themselves, then HWT and PG&E shall provide just compensation for this work.</p>	<p>Revise text as follows:</p> <p>HWT or PG&E shall ensure that agricultural land temporarily impacted by construction activities <u>associated with their respective components</u> is adequately restored following completion of construction to pre-project conditions. These include areas impacted from establishment of temporary staging and storage areas, installation of the underground fiber optic cable link, installation of the 230 kV interconnection structures, preparation and temporary use of pull sites and crossing guard structures, and preparation and use of helicopter landing zones. Restoration of sites will involve removing any rock or material imported to stabilize the site, replacement of topsoil, de-compacting any soil that has been compacted by heavy equipment, and re-planting of agricultural crops <u>unless the property owner requests that the material remain for their use.</u> The responsibility of performing these various tasks may be stipulated in an agreement between HWT or PG&E, and the landowner(s) completed for the Proposed Project or alternatives. If a landowner is better equipped or prefers to replant crops or perform other tasks themselves, then HWT and/or PG&E shall provide just compensation for this work.</p>
J-256	F-14	<p>Mitigation Measure AG-2: Restore Agricultural Land Temporarily Impacted by Construction Activities.</p> <p>1. Confirm the measure is incorporated into the project contract documents. (CPUC)</p>	<p>In numerous APMs and mitigation measures in the MMRP, the following monitoring and reporting action is required: "Confirm that this measure is included in contract documents. (CPUC)" The CPUC is directed to confirm implementation of this requirement "During the preparation of plans and specifications." So far as the PG&E team is aware, this condition has never been imposed in an MMRP prepared by the CPUC. The condition is not needed to ensure that APMs and mitigation measures are implemented. PG&E is obligated to comply with all APMs and mitigation measures, and it is liable to the CPUC for any non-compliance with these measures that may result from the acts or omissions of its contractors. The language CPUC proposed is problematic because it inserts the CPUC into the contractual relationship between PG&E and its contractors.</p> <p>PG&E proposes that the text be revised as follows:</p> <p><u>"Confirm that this measure is included in contract documents. (CPUC) Provide documentation that contractors have received a copy of this measure. (PG&E/HWT)"</u></p>
J-257	F-17	<p>Mitigation Measure AQ-1: Prepare a Construction Activity Management Plan for Approval by SLOCAPCD.</p> <p>HWT, PG&E, or their contractor(s) shall implement the following measures:</p> <p>Prepare a Construction Activity Management Plan (CAMP) that contains at a minimum the following SLOCAPCD standard mitigation measures, BACT measures and diesel idling restrictions that are not already in the APMs. The CAMP shall be submitted to the air pollution control district (APCD) for review and approval prior to the start of construction and shall include, but not be limited to, the following elements:</p> <ol style="list-style-type: none">1. A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures that were listed above in the "dust control measures" section;2. Tabulation of on and off-road construction equipment (age, horse-power and miles and/or hours of operation). Use of diesel construction equipment meeting ARB's Tier 3 and Tier 4 off-road and 2010 on-road compliant engines; Repowering equipment with the cleanest engines available; At a minimum the off-road equipment fleet shall meet the CARB off-road emissions average for that calendar year.3. Scheduling of construction truck trips during non-peak hours to reduce peak hour emissions	<p>The CAMP submitted to the SLOCAPCD will meet all of their requirements, which are subject to change. To avoid confusion and unnecessary overlap, we will follow the guidance for development of the CAMP, with regard to dust control, construction equipment requirement, scheduling, hours of operation, length of work periods, and any other requirements.</p> <p>Revise text as follows</p> <p>HWT, PG&E, or their contractor(s) shall implement the following measures:</p> <p>Prepare a Construction Activity Management Plan (CAMP) that contains at a minimum the following SLOCAPCD standard mitigation measures, BACT measures and diesel idling restrictions that are not already in the APMs. The CAMP shall be submitted to the air pollution control district (APCD) for review and approval prior to the start of construction, and shall include, but not be limited to, the following elements:</p> <ol style="list-style-type: none">1. A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures that were listed above in the "dust control measures" section;2. Tabulation of on and off-road construction equipment (age, horse-power and miles and/or hours of operation). Use of diesel construction equipment meeting ARB's Tier 3 and Tier 4 off-road and 2010 on-road compliant engines; Repowering equipment with the cleanest engines available; At a minimum the off-road equipment fleet shall meet the CARB off-road emissions average for that calendar year.3. Scheduling of construction truck trips during non-peak hours to reduce peak hour emissions
J-258	F-17	<p>Mitigation Measure AQ-1: Prepare a Construction Activity Management Plan for Approval by SLOCAPCD.</p> <p>3. Scheduling of construction truck trips during non-peak hours to reduce peak hour emissions</p>	<p>Clarify the meaning of non-peak hour and revise text as follows:</p> <p>3. Scheduling of construction truck trips during non-peak hours to reduce peak hour emissions, <u>when possible.</u></p>
J-259	F-18	<p>APM BIO-1: Design Project to Avoid or Minimize Impacts on Known Occurrences of Conduct Pre-Construction Survey(s) for Special-Status Plants Species and Sensitive Resource Areas</p>	<p>Revise text as follows:</p> <p>APM BIO-1. Design Project to Avoid or Minimize Impacts on Known Occurrences of Conduct Pre-Construction Survey(s) for Special-Status Plants Species and Sensitive Resource Areas <u>Conduct Pre-Construction Survey(s) for Special-Status Species and Sensitive Resource Areas</u></p>

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J-260	F-21	APM BIO-3 - Monitoring and Reporting Action (Responsible Party) 2. Confirm that biologists monitor initial ground- disturbing activities in and adjacent to sensitive habitat areas. (CPUC)	Revise text as follows: 2. Confirm that biologists monitor initial ground- disturbing activities in and adjacent to sensitive habitat areas <u>and implement the measures in accordance with this APM.</u> (CPUC)
J-261	F-22	APM BIO-4 - Monitoring and Reporting Action (Responsible Party) 2. Confirm that trenches/excavations have a sloped escape ramp or are covered at the end of each day. (Project Proponents)	Revise text as follows: 2. Confirm that trenches/excavations have a sloped escape ramp or are covered at the end of each day. (<u>Project proponents CPUC</u>)
J-262	F-22	APM BIO-4 - Monitoring and Reporting Action (Responsible Party) 3. Confirm that trenches and excavations are inspected for wildlife at the beginning of the workday and prior to backfilling. (Project proponents)	Revise text as follows 3. Confirm that trenches and excavations are inspected for wildlife at the beginning of the workday and prior to backfilling. (<u>Project proponentsCPUC</u>)
J-263	F-23	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status. <u>Special-Status Plants:</u> Pre-construction surveys required under APM BIO-1 shall be conducted of all proposed work, plus a 100-foot buffer, within 1 year before commencement of ground-disturbing activities according to the <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (CDFW 2018 or current version). Floristic surveys shall be performed during the appropriate bloom period(s) for each species. HWT/PG&E or their contractor(s) shall work with the CDFW-approved qualified botanist to identify plants	Revise as follows: Special-Status Plants: Pre-construction surveys required under APM BIO-1 shall be conducted of all proposed work, plus a 100-foot buffer, <u>within 1 year</u> before commencement of ground-disturbing activities according to the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities Floristic surveys shall be performed during the appropriate bloom period(s) for each species. HWT/PG&E or their contractor(s) shall work with the CDFW <u>CPUC</u> -approved qualified botanist to identify plants
J-264	F-24	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. <u>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species:</u> HWT/PG&E shall retain a CPUC-, USFWS-, and CDFW-approved biologist(s) to conduct pre-construction surveys for special-status plants and wildlife prior to initial vegetation clearance, grubbing, and ground- disturbing activities.	Revise text as follows: <u>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species:</u> HWT/PG&E shall retain a <u>CPUC-, USFWS-, and CDFW</u> -approved biologist(s) to conduct pre-construction surveys for special-status plants and wildlife prior to initial vegetation clearance, grubbing, and ground- disturbing activities.
J-265	F-25	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. <u>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species:</u> The pre-construction survey report shall be submitted to the CPUC for review and approval prior to the start of construction. The pre-construction surveys shall be conducted no earlier than 30 days prior to surface disturbance. The results of the pre-construction surveys shall be documented by the approved biologist in a pre-construction survey report. The pre-construction survey report shall be submitted to the CPUC for review and approval prior to the start of construction, and the results shall be submitted to USFWS and CDFW as required by any regulatory permits or approvals. The pre- construction study report shall include the following:	Revise text as follows: The pre-construction survey report shall be submitted to the CPUC <u>for review and approval</u> prior to the start of construction The pre-construction surveys shall be conducted no earlier than 30 days prior to surface disturbance <u>within the work areas</u> . The results of the pre-construction surveys shall be documented by the approved biologist in a pre-construction survey report. The pre-construction survey report shall be submitted to the CPUC <u>for review and approval</u> prior to the start of construction, and the results shall be submitted to USFWS and CDFW as required by any regulatory permits or approvals. The pre- construction study report shall include the following:
J-266	F-25	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. <u>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species:</u> Sensitive habitat areas, plus a minimum 5-foot buffer for wetlands and waters of the U.S., that will be avoided by construction shall be fenced with orange safety fencing. Biological monitoring required by APM BIO-3 is extended to be necessary when each portion of previously undisturbed ground is disturbed, based on special- status species' requirements and the profession opinion of the qualified biological monitor; however, work near wetlands and waters of the U.S. will be monitored by a biological monitor over its duration.	Revise text as follows: Sensitive habitat areas, plus a minimum 5-foot buffer for wetlands and waters of the U.S., that will be avoided by construction shall be fenced with orange safety fencing. Biological monitoring required by APM BIO-3 is extended to be necessary when each portion of previously undisturbed ground is disturbed, based on special- status species' requirements and the profession opinion of the qualified biological monitor; however, <u>work near within 50 feet of</u> wetlands and waters of the U.S. will be monitored by a biological monitor over its duration.
J-267	F-25	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. <u>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species:</u> In order to ensure that habitats are not adversely affected, the USFWS- and CDFW-approved biologist shall flag boundaries of habitat,	Revise text as follows: In order to ensure that habitats are not adversely affected, the USFWS- and CDFW <u>CPUC</u> -approved biologist shall flag boundaries of habitat,
J-268	F-26	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. <u>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species</u> The USFWS- and CDFW-approved biologist shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats	Revise text as follows: The USFWS- and CDFW <u>CPUC</u> -approved biologist shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats
J-269	F-27	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. <u>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species:</u> Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction. Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.	Gravel bags and other sediment controls will be requirements of the SWPPP and should not be included as mitigation. Revise text as follows: Pg. 29 Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction. Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.
J-270	F-27	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. <u>Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species:</u> In the event that any work will occur beyond the approved limits, it shall be reported to HWT's and PG&E's compliance teams and the CPUC.	Revise text as follows: In the event that any work will occur beyond the approved limits, it shall be reported to HWT's and PG&E's compliance teams and the CPUC.

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J-271	F-28	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. Wildlife Protection from Work Areas: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment. Large/steep excavations shall be covered and/or fenced nightly to prevent wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route. .	Revise text as follows: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment. Large/steep excavations shall be covered and/or fenced nightly to prevent wildlife entrapment. Excavations shall provide an earthen ramp (where feasible) and, if not, wood planks or escape ramps to allow for a wildlife escape route.
J-272	F-28	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. Wildlife Protection from Work Areas: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment. Large/steep excavations shall be covered and/or fenced nightly to prevent wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route.	In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all uncovered and unfenced steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment. Large/steep excavations shall be covered and/or fenced nightly to prevent wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route.
J-273	F-28	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. Nesting Birds: Activities conducted pursuant to APM BIO-2 shall consider the nesting bird season revised to be January 15 through August 31	Revise text as follows: Activities conducted pursuant to APM BIO-2 shall consider the nesting bird season, commencing January 15 for golden eagle and February 1 for all other birds through August 31 revised to be January 15 through August 31 .
J-274	F-28 and F-29	Mitigation Measure BIO-1: Actions to Further Avoid and Minimize Impacts to Special-Status Species. San Joaquin Kit Fox: If a kit fox is discovered at any time in the project area, all construction must stop and the CDFW and USFWS contacted immediately. The appropriate federal and state permits must be obtained before the project can proceed.	Revise text as follows: If a kit fox is discovered at any time in the project area, all construction in the immediate vicinity must stop, photos taken as feasible , and the CDFW and USFWS contacted immediately. The appropriate federal and state permits must be obtained before the project can proceed.
J-275	F-29 and F-30	Mitigation Measure BIO-2: Compensate for Impacts to Special-Status Plant Species If avoidance of special-status plants is not feasible, HWT and PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at a CDFW-approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of CDFW. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW, it shall be conducted pursuant to a CPUC- and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness. At the end of the 5-year monitoring period, the mitigation shall have met the following success criteria: <ul style="list-style-type: none">• A surveyed plant population size count roughly equal to or greater than the number of individuals transplanted (this total may include both transplanted individuals that have survived, as well as any additional supplemental plantings following the initial transplantation that have survived at least two growing seasons), and• Less than 5 percent cover of invasive weeds within the restoration area.	Plant monitoring requirements would depend on the species impacted and restored and can be included in the salvage and relocation plan referenced. The 5-year monitoring requirement should be removed, as the amount of monitoring should be paired with the specific special-status plant restored. Revise text as follows: If avoidance of special-status plants is not feasible, HWT and PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at an CDFW -approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of the CPUC CDFW . Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW , it shall be conducted pursuant to a CPUC- and CDFW -approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness. At the end of the 5-year monitoring period, the mitigation shall have met the following success criteria: <ul style="list-style-type: none">• A surveyed plant population size count roughly equal to or greater than the number of individuals transplanted (this total may include both transplanted individuals that have survived, as well as any additional supplemental plantings following the initial transplantation that have survived at least two growing seasons), and• Less than 5 percent cover of invasive weeds within the restoration area.
J-276	F-29 and F-30	MM BIO-2. Compensate for Impacts to Special-Status Plant Species. Monitoring and Reporting Action (Responsible Party): 2. If salvage and relocation is selected as the compensation method, confirm annual monitoring and achievement of success criteria at the end of 5 years. (CPUC).	Revise text as follows: If salvage and relocation is selected as the compensation method, confirm annual monitoring and achievement of success criteria at the end of 5 years. (CPUC).
J-277	F-30 and F-31	Mitigation Measure BIO-3: Minimize Impacts to Raptors and Other Avian Life from Transmission and Power Line Facilities. HWT, PG&E, and/or their contractor(s) shall construct all aboveground power transmission and power lines to the APLIC's recommended publications: Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006, and Reducing Avian Collisions with Power Lines: State of the Art in 2012 (APLIC 2006, 2012). In conjunction with these publications, HWT and PG&E shall be responsible for creating an Avian Protection Plan that incorporates relevant project-specific guidelines found in APLIC's and USFWS' 2005 Avian Protection Plan Guidelines. As part of the Avian Protection Plan development, HWT and PG&E shall work with USFWS to determine the need for installation of bird diverters in areas near known golden and bald eagle nests.	PG&E incorporates APLIC guidance into PG&E's Avian Protection Plan and formulates standards for avian protection that are consistent with engineering requirements. PG&E should not be required to generate a separate project-specific avian protection plan to address concerns that are mitigated through its avian protection program which PG&E coordinates directly with USFWS on an annual basis. Revise text as follows: HWT , PG&E, and/or their contractor(s) shall construct all aboveground power transmission and power lines to the APLIC's recommended publications: Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006, and Reducing Avian Collisions with Power Lines: State of the Art in 2012 (APLIC 2006, 2012). In conjunction with these publications, HWT and PG&E shall be responsible for implementing the company's creating an Avian Protection Plan that incorporates relevant project-raptor -safe construction specific guidelines found in APLIC's and USFWS' 2005 Avian Protection Plan Guidelines.
J-278	F-31	Mitigation Measure BIO-3: Minimize Impacts to Raptors and Other Avian Life from Transmission and Power Line Facilities. As part of the Avian Protection Plan development, HWT and PG&E shall work with USFWS to determine the need for installation of bird diverters in areas near known golden and bald eagle nests.	Bird diverters may not be very helpful to prevent eagle contacts, instead careful consideration of design components should be followed under PG&E's avian protection standards to ensure that distribution lines are raptor-safe. Revise text as follows: As part of the Avian Protection Plan development , HWT and PG&E shall work with USFWS to determine the need for installation of bird diverters in areas near known golden and bald eagle nests.

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J-279	F-31	Mitigation Measure BIO-3: Minimize Impacts to Raptors and Other Avian Life from Transmission and Power Line Facilities. Operational construction or replacement work shall be avoided during the nesting bird season (January 15 to August 31) to the extent feasible.	Revise text as follows: Operational Construction or replacement work shall be avoided during the nesting bird season (January 15 to August 31 commencing January 15 for golden eagle and February 1 for all other birds through August 31) to the extent feasible.
J-280	F-31	Mitigation Measure BIO-3: Minimize Impacts to Raptors and Other Avian Life from Transmission and Power Line Facilities. If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive. If operational construction activities must occur within this buffer, the biologist shall coordinate with CDFW and, as necessary, USFWS to determine buffer reductions and/or nest monitoring to avoid impacts to active nests.	This statement requires coordination and approval from CDFW and/or USFWS when no-disturbance buffers are reduced. It is not appropriate or feasible for PG&E to seek approvals for buffer reductions pertaining to individual nests from CDFW or USFWS, as there is no specific mechanism (beyond CFGC or MBTA take prohibitions) for either agency to grant approvals for particular nest buffer distance reductions. Revise text as follows: If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive <u>in accordance with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA) as detailed in APM BIO-2 and Mitigation Measure BIO-1.</u> If operational construction activities must occur within this buffer, the biologist shall <u>inform CPUC, coordinate with CDFW, and, as necessary, USFWS to determine of any</u> buffer reductions and/or nest monitoring to avoid impacts to active nests.
J-281	F-31 and F-32	Mitigation Measure BIO-4: Develop and Implement a Restoration Plan for Blue Oak Woodland Habitat. HWT, PG&E, and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat. For any temporary impact, all disturbed soils and new fill in this habitat shall be revegetated with site-appropriate native species. For any permanent impact, blue oak woodland habitat shall be mitigated at a ratio of 1.1:1 (replacement to impact). Blue oak trees and valley oak trees that are removed shall be mitigated at a ratio that shall be determined based on the diameter at breast height (dbh) of the tree, as described further below.	Woody vegetation would be prohibited along the underground corridor. Revise text as follows: HWT, PG&E, and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat. For any temporary impact, all disturbed soils and new fill in this habitat shall be revegetated with site-appropriate native species <u>compatible with the facility.</u> For any permanent impact, blue oak woodland habitat shall be mitigated at a ratio of 1.1:1 (replacement to impact). Blue oak trees and valley oak trees that are removed shall be mitigated at a ratio that shall be determined based on the diameter at breast height (dbh) of the tree, as described further below.
J-282	F-32	Mitigation Measure BIO-4: Develop and Implement a Restoration Plan for Blue Oak Woodland Habitat. Blue oak woodland restoration or compensation may be completed at the work area, in the vicinity, or at a conservation bank with a service area that covers the Proposed Project or selected alternative. Revegetated or restored areas shall be maintained and monitored to ensure a minimum of 65 percent survival of woody plantings after 5 years .	Revise as follows: Blue oak woodland restoration or compensation may be completed at the work area, in the vicinity, or at a conservation bank with a service area that covers the Proposed Project or selected alternative. Revegetated or restored areas shall be maintained and monitored to ensure a minimum of 65 percent survival of woody plantings after 5 years (or 75 percent after 3 years) <u>or at a conservation bank with a service area that covers the Proposed Project or selected alternative.</u>
J-283	F-36 and F-37	Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6. The following actions by the CPUC are designed to augment the APMs provided by the Project proponents to ensure that construction impacts to cultural resources are mitigated to a level of less than significant: a. The CPUC shall appoint a qualified archaeologist to represent the interests of the CPUC and oversee the implementation of the APMs with regard to archaeological resources on their behalf. The archaeologist shall meet the U.S. Secretary of the Interior's Professional Qualifications Standards for Archeology.	This portion of the measure refers to an action taken by the CPUC, not the Applicants. Therefore, it should be removed. Revise text as follows: The following actions by the CPUC are designed to augment the APMs provided by the Project proponents to ensure that construction impacts to cultural resources are mitigated to a level of less than significant: a. The CPUC shall appoint a qualified archaeologist to represent the interests of the CPUC and oversee the implementation of the APMs with regard to archaeological resources on their behalf. The archaeologist shall meet the U.S. Secretary of the Interior's Professional Qualifications Standards for Archeology.
J-284	F-36 and F-37	Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6. b. The Project proponents shall make every effort to design the project to avoid known eligible or potentially eligible cultural resources for the Proposed Project, reasonably foreseeable distribution components, and alternatives. A 50-foot buffer, using flagging, rope, tape, or fencing, shall be established around the boundary of each respective resource, which shall be designated an environmentally sensitive area. If the proponent engineers determine that the project cannot be designed to avoid known cultural resources and construction will encroach upon the resource buffer, construction monitoring by an archaeologist shall be required.	This portion of the measure is already required by APM Cul-4 and should therefore be removed. Revise text as follows: b. The Project proponents shall make every effort to design the project to avoid known eligible or potentially eligible cultural resources for the Proposed Project, reasonably foreseeable distribution components, and alternatives. A 50-foot buffer, using flagging, rope, tape, or fencing, shall be established around the boundary of each respective resource, which shall be designated an environmentally sensitive area. If the proponent engineers determine that the project cannot be designed to avoid known cultural resources and construction will encroach upon the resource buffer, construction monitoring by an archaeologist shall be required.
J-285	F-37	Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6. A Native American representative from a consulting tribe shall be retained to monitor the construction activities if the resource is a Native American archaeological site.	The CPUC performed AB 52 consultation, and PG&E was not present. Given local tribal territories and desires, it is inappropriate for PG&E to choose a monitor, that should be done by the CPUC. Revise text as follows: A Native American representative from a consulting tribes identified by the CPUC shall be retained to monitor the construction activities if the resource is a Native American archaeological site. <u>The Project proponent will be responsible for communicating project schedules and needs to the Native American monitor and/or tribe, but it is the responsibility of the tribe to ensure that the monitor is on site when called for, and work may proceed if the Project proponent has provided adequate notice of work.</u>

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J-286	F-38	Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6. The archaeological monitor shall notify the Project’s cultural resources principal investigator immediately, and the principal investigator shall, in turn, notify the CPUC and their appointed professional archaeologist. If an archaeological monitor is not present at the time of the find, Project proponent’s environmental inspector or construction supervisor shall make the notifications. The Project’s cultural resources principal investigator shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment.	Revise text as follows: The archaeological monitor shall notify the Project’s cultural resources principal investigator immediately, and the principal investigator shall, in turn, notify the CPUC and their appointed professional archaeologist. <u>If the discovery happens during work being performed by PG&E, the PG&E cultural resource specialist (CRS) must also be notified alongside the CPUC. PG&E’s CRSs meet Secretary of the Interior Qualifications as archaeological principal investigators, and have extensive experience performing cultural resources studies within the electrical utility environment.</u> If an archaeological monitor is not present at the time of the find, Project proponent’s environmental inspector or construction supervisor shall make the notifications. The Project’s cultural resources principal investigator shall inspect the find within 24 hours of discovery and notify the CPUC, <u>and, if on a PG&E portion of the project, PG&E’s CRS,</u> of their initial assessment.
J-287	F-38	Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.	Add the following text: Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones. <u>If the assessment of significance can be made by the cultural resources principal investigator based on a small sample of discovered material, then the CPUC must respond in writing within 48 hours, or it may be assumed that the CPUC concurs with the principal investigator’s findings. If analysis of the discovery requires an in-depth study (i.e., eligibility excavations, etc.) then the CPUC must respond in writing within 1 week of receipt of the principal investigator’s report, or it may be assumed that the CPUC concurs with the principal investigator’s findings. If the resource is found during PG&E work, or PG&E work will be impacted by the presence or discovery of the resource, then the principal investigator will consult with the PG&E CRS throughout the assessment and, if appropriate, treatment process.</u>
J-288	F-38	Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6. The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System. Work in the area may commence, at the direction of the CPUC, upon completion of treatment and under the direction of the qualified archaeologist.	Revise text as follows: The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System. <u>The CPUC must provide either concurrence or comments in writing within 1 week of receiving the report. A lack of response from the CPUC may be taken as concurrence with the sufficiency of the treatment documented within the report.</u> Work in the area may commence, at the direction of the CPUC, following concurrence from the CPUC that the work performed was sufficient, upon completion of treatment and under the direction of the qualified archaeologist. <u>Should the resource also be identified as a tribal cultural resource, then measures outlined in Section 4.18 will also apply if resource-specific measures identified during the resource-specific consultation do not supersede them.</u>
J-289	F-42	Mitigation Measure CR-2: Comply with the Legal Requirements of PRC 5097.98. In turn, the principal investigator shall immediately notify the County coroner, as well as the CPUC and their appointed professional archaeologist.	Revise text as follows: In turn, the principal investigator shall immediately notify the County coroner, as well as the CPUC and their appointed professional archaeologist <u>and, if the discovery is made during PG&E activities, the PG&E CRS.</u>
J-290	F-42	Mitigation Measure CR-2: Comply with the Legal Requirements of PRC 5097.98. The most likely descendent will complete inspection of the site and make recommendations or preferences for treatment within 48 hours of being granted access to the site. Construction will not continue in the protected area until treatment of the remains has been resolved and notice is provided by the CPUC archaeologist to resume work in the area.	Revise text as follows: The most likely descendent will complete inspection of the site and make recommendations or preferences for treatment within 48 hours of being granted access to the site. <u>As per Section 5097.98 of the PRC, the MLD must also work with the landowner to determine appropriate treatment of remains.</u>
J-291	F-42	Mitigation Measure CR-2: Comply with the Legal Requirements of PRC 5097.98. Construction will not continue in the protected area until treatment of the remains has been resolved and notice is provided by the CPUC archaeologist to resume work in the area.	Time limits are valuable as they allow PG&E to know clearly when something is complete, as opposed to when it is ongoing, and it allows. Revise text as follows: Construction will not continue in the protected area until treatment of the remains has been resolved and notice is provided by the CPUC archaeologist to resume work in the area, <u>which the CPUC must provide within 24 hours of resolution. If an MLD is not identified by the NAHC, or if the MLD and the landowner cannot reach agreement, then the provisions of PRC Section 5097.98 will be put into effect.</u>
J-292	F-43	Mitigation Measure CR-3: Complete Cultural Resources Studies, Evaluate Resources for Significance, and Implement Avoidance and Minimization Measures. The pedestrian survey shall include systematic surface inspection with transects spaced at 15-meter (approximately 50-foot) intervals, or less, and shall cover the entire site or alignment and a 100-foot buffer around the site or alignment.	Depending on the locations, 15 meter transects or less, while certainly preferred, may not be possible or safe. Revise text as follows: The pedestrian survey shall include systematic surface inspection with transects spaced at 15-meter (approximately 50-foot) intervals; or less <u>where feasible and safe (owing to landform, paving, and previous construction). Where such transects are not feasible or safe, survey shall provide the most complete coverage possible either through wider transects (ex. on steep slopes near rivers) or opportunistic survey (ex.: locations where private property fences or buildings/pavement obscure the ground),</u> and shall cover the entire site or alignment and a 100-foot buffer around the site or alignment.
J-293	F-45	Mitigation Measure CR-3: Complete Cultural Resources Studies, Evaluate Resources for Significance, and Implement Avoidance and Minimization Measures. Archaeological sites found to contain human remains must be treated in accordance with the provisions of Section 7050.5 of the California Health and Safety Code (see APM CUL-4 and Mitigation Measure CR-2). Should any archaeological site be determined eligible for listing in the CRHR, and if Project proponent design engineers determine that any portion of the site that contributes to its eligibility cannot be avoided by construction, a data recovery program shall be necessary and a detailed data recovery plan shall be prepared by a qualified archaeologist per Mitigation Measure CR-1(b). The data recovery plan must be submitted and approved by the CPUC prior to implementation of the plan. The CPUC shall ensure that consulting tribes will have the opportunity to review the data recovery plan for any CRHR-eligible Native American site.	Revised text as follows: Archaeological sites found to contain human remains must be treated in accordance with the provisions of Section 7050.5 of the California Health and Safety Code (see APM CUL-4 and Mitigation Measure CR-2). <u>The CPUC and tribes must either comment on or concur with the findings of the report within 30 days of receipt. Lack of response within 15 days may be considered concurrence.</u> Should any archaeological site be determined eligible for listing in the CRHR, and if Project proponent design engineers determine that any portion of the site that contributes to its eligibility cannot be avoided by construction, a data recovery program shall be necessary and a detailed data recovery plan shall be prepared by a qualified archaeologist per Mitigation Measure CR-1(b). The data recovery plan must be submitted and approved by the CPUC prior to implementation of the plan. The CPUC shall ensure that consulting tribes will have the opportunity to review the data recovery plan for any CRHR-eligible Native American site. <u>The CPUC and tribes must either comment on or concur with the findings of the report within 30 days of receipt. Lack of response within 15 days may be considered concurrence.</u>

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J-294	F-53	Mitigation Measure GEO-1. Mitigation Measure GEO-1: Implement Recommendations in the Project Geotechnical Investigation Report. HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017). These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.	Revise text as follows: HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017), <u>as appropriate for the work, as well as any addenda or subsequent modifications to such reports to account for updated structural design criteria based on the latest California Building Code requirements.</u> These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.
J-295	F-54	Mitigation Measure GEO-2. Paleontological Resources Survey, Technical Report, and Construction Monitoring. Applicability: RFDC, SS-1, PLR-1C	RFDC would not be constructed under this PTC. Therefore, this measure should not apply to this alternative. Revise text as follows: Applicability: RFDC , SS-1, PLR-1C
J-296	F-54	Mitigation Measure GEO-2. Paleontological Resources Survey, Technical Report, and Construction Monitoring. The PRTR shall be prepared in accordance with standards provided by the Society for Vertebrate Paleontology and shall assign site sensitivity based on the potential fossil yield classification system utilized by the Bureau of Land Management.	Revise text as follows: The PRTR shall be prepared in accordance with standards provided by the Society for Vertebrate Paleontology and shall assign site sensitivity based on the potential fossil yield classification system utilized by the Bureau of Land Management, <u>and may use additional measures of paleontological sensitivity as determined appropriate by the qualified paleontologist.</u>
J-297	F-58	Mitigation Measure HAZ-1. Prepare and Implement a Fire Prevention and Management Plan. <u>Monitoring and Reporting Action (Responsible Party)</u> 3. Confirm that the plan is reviewed the San Luis Obispo County Fire Department. (CPUC)	CAL FIRE functions as the County Fire Department under a contract with the County of San Luis Obispo. Revised text as follows: 3. Confirm that the plan is reviewed <u>by CAL FIRE</u> the San Luis Obispo County Fire Department. (CPUC)
J-298	F-58	Mitigation Measure HAZ-1. Prepare and Implement a Fire Prevention and Management Plan. For project or alternative components located within a very high or high fire hazard severity zone, HWT and PG&E shall prepare and implement a fire prevention and management plan. The document will address fire prevention measures that will be employed during the construction phases, identifying potential sources of ignition and detailing the measures, equipment, and training that will be provided to all site contractors. The fire prevention and management plan shall also address potential ignition risks during operation of the project or alternative components. Coordination with state and local fire agencies is required, as specified below, and the plan shall be submitted to the CPUC for final review and approval prior to start of construction. Where applicable, overlap with the HWT and PG&E Wildfire Mitigation Plans prepared pursuant to California Public Utilities Code Section 8386 shall be highlighted in the fire prevention and management plan. Specifically, the plan will include, at a minimum, the following:	PG&E and HWT would develop and implement separate fire prevention and management plans. Revise text as follows: For project or alternative components located within a very high or high fire hazard severity zone, HWT and PG&E shall prepare and implement a separate fire prevention and management plans. These documents will address fire prevention measures that will be employed during the construction phases, identifying potential sources of ignition and detailing the measures, equipment, and training that will be provided to all site contractors. The fire prevention and management plans shall also address potential ignition risks during operation of the project or alternative components. Coordination with state and local fire agencies is required, as specified below, and the plans shall be submitted to the CPUC for final review and approval prior to start of construction. Where applicable, overlap with the HWT and PG&E Wildfire Mitigation Plans prepared pursuant to California Public Utilities Code Section 8386 shall be highlighted in the fire prevention and management plan. Specifically, the plans will include, at a minimum, the following:
J-299	F-60	Mitigation Measure HAZ-1. Prepare and Implement a Fire Prevention and Management Plan. Design and Operation Considerations to Minimize Fire Hazard <ul style="list-style-type: none">Development and implementation of protocols for de-energizing the substation and/or transmission line components in the event of a wildfire; and	At a system level, PG&E's grid control center manages coordination of transmission line and substation clearances/outages during wildfire events, including coordination with CDF and other fire agencies. As such, this portion of the measure should be removed. Revise text as follows: Development and implementation of protocols for de-energizing the substation and/or transmission line components in the event of a wildfire; and
J-300	F-60	Mitigation Measure HAZ-1. Prepare and Implement a Fire Prevention and Management Plan. Design and Operation Considerations to Minimize Fire Hazard <ul style="list-style-type: none">Inclusion of any needed water storage facilities on-site at the substation accessible to firefighters.	PG&E does not have access to a water source. This portion of the measure is not feasible and should be removed. Revise text as follows: Inclusion of any needed water storage facilities on-site at the substation accessible to firefighters.
J-301	F-62	Mitigation Measure HYD/WQ-1. Implement Construction Best Management Practices for Erosion Control. For ground-disturbing construction activities that do not require coverage under the Construction General Permit (e.g., total ground disturbance associated with that action does not exceed 1 acre), HWT, PG&E, and/or their contractors shall implement the following measures during construction of the alternative components, or shall implement alternative measures that are equally or more effective: <ul style="list-style-type: none">Implement practices to reduce erosion of exposed soil and stockpiles, including watering for dust control, establishing perimeter silt fences, and/or placing fiber rolls.Minimize soil disturbance areas.Implement practices to maintain water quality, including silt fences, stabilized construction entrances, and storm-drain inlet protection.Where feasible, limit construction to dry periods.Revegetate disturbed areas.	The PTCs sought by the Applicants do not include authorization to construct the reasonably foreseeable distribution components. The mitigation measures will apply to the project components Applicants are authorized to construct under the PTCs. However, because the Applicants are not seeking authority to construct the reasonably foreseeable distribution components under the PTCs, mitigation measures imposed under the PTCs should not apply to the reasonably foreseeable distribution components. Revise text as follows: For ground-disturbing construction activities that do not require coverage under the Construction General Permit (e.g., total ground disturbance associated with that action does not exceed 1 acre), HWT, PG&E, and/or their contractors shall implement the following measures during construction of the alternative components, or shall implement alternative measures that are equally or more effective:<ul style="list-style-type: none">Implement practices to reduce erosion of exposed soil and stockpiles, including watering for dust control, establishing perimeter silt fences, and/or placing fiber rolls.Minimize soil disturbance areas.Implement practices to maintain water quality, including silt fences, stabilized construction entrances, and storm-drain inlet protection.Where feasible, limit construction to dry periods.Revegetate disturbed areas

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Comments on the Behind-the-Meter Analysis

J-305 Below are PG&E's detailed comments on the Behind-the-Meter Solar Plus Storage Adoption Propensity Analysis (BTM Analysis), provided by Energy Division as Appendix B to DEIR Appendix B (Final Alternatives Screening Analysis). Page references are to the BTM Analysis.

Scope of BTM Analysis Is Flawed

- J-306 • The BTM Analysis states that its analysis is based on evaluation of the time-series load profiles for approximately 75,000 customers (p. 10). However, the Paso Robles DPA only has approximately 47,000 customers. Therefore, the study is flawed because it is based on too large a pool of customers and therefore overestimates the number of potential BTM adopters in the Paso Robles DPA.
- J-307 • It is unclear how the study's analysis incorporates the number of customers who either already have storage systems installed or have applied to install such systems. The total BTM adoption propensity scenarios listed in Table 4 range from low, medium and high estimates of approximately 17,000, 19,000 and 21,000 customers, respectively. The total Paso Robles DPA has roughly 47,000 customers, and approximately 6,000 of these are already residential solar PV customers. Of the remaining 41,000 customers, some portion of them reside in apartment buildings or multi-family units. The BTM Analysis does not account for these customers or explain why they should be included in the group of customers that could install a solar plus storage system. Even assuming that all customers in the DPA that rent could install solar plus storage, based on the estimates provided in Table 4, the study predicts a BTM adoption propensity for solar plus storage that ranges between 41 to 51 percent of these remaining 41,000 customers.
- J-308 • The study is unclear whether its analysis is based on the economic propensity of customers in the Paso Robles DPA to adopt BTM storage or BTM storage plus solar
- J-309 • The study, admittedly, does not address the likelihood or timing of customer's adopting storage: "Economic propensity analyses simply identify customers for which it would make economic sense to adopt a technology, not necessarily what is likely to occur" (p. 14).
 - J-310 ○ The study's propensity finding is high relative to statewide forecast. The study finds a propensity for 125-175 MW of storage in the Paso Robles DPA. For comparison, the CEC forecasts the state of California will have approximately 700-900 MW of behind-the-meters storage. In other words, the study finds that approximately 18 percent of the CEC's adoption forecast for the entire state could be achieved in the Paso Robles DPA
 - J-311 ○ Given the absence of storage mandates, future storage adoption is highly uncertain.

Modeling Assumptions are Not Reasonable and Skew the Results of the Analysis

- J-312 The inputs and assumptions used in the model to assess BTM adoption propensity are flawed.
- J-313 • The study arbitrarily uses a 10-year payback period as the threshold below which a customer is determined to have a propensity to invest in BTM storage or storage plus PV system. Moreover, the study is vague as to whether the 10-year payback period is applied in the context of purchasing a PV system or a PV plus storage system.

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Comments on the Behind-the-Meter Analysis

- J-314
- The study does not provide a range of dollar amounts used for the cost of a residential PV solar system. Instead, it states that the size of a PV system “is optimized based on household energy consumption,” and “cost is aligned with IRP assumptions on dollars per watt (\$/W) for 2019.” The BTM Analysis should provide greater detail and transparency to describe these calculations.
- J-315
- The study states that “publicly available studies” on the value of lost load range from \$5 to \$20/kWh. The BTM Analysis should provide a citation to the studies it relied on.
- Incentives Availability Is Overestimated**
- J-316
- Incentives can have significant impact on the economic feasibility of storage systems, but the BTM Analysis does not explicitly detail its assumptions about how the incentives in the SGIP and ITC programs were factored into its analysis. These programs provide a wide range of incentives based on customer eligibility and year of adoption, which will influence the results produced by the BTM Analysis.
 - The BTM Analysis says that it incorporates SGIP incentives (p.13). Depending on customer eligibility, residential SGIP incentives currently range from \$250 - \$1,000 per kWh of battery capacity. What dollar amount was used in the BTM Analysis? Moreover, SGIP funding is currently scheduled to end in 2024, and funding could be exhausted sooner. This means that SGIP funding will end on or before the in-service date of the Proposed Project and should not be factored into the BTM Analysis for purposes of comparing Alternative BS-3 to the reasonably foreseeable distribution components.
 - The study says that it incorporates the ITC program (p. 13). The level of ITC incentive decreases every year between 2019 and 2022, and the residential incentive ends in 2021. This means that ITC funding will end on or before the PTC proceeding is completed and well before the actual in-service date of the Proposed Project. Similar to the SGIP incentive, ITC program incentives should not be factored into the BTM Analysis for purposes of comparing Alternative BS-3 to the reasonably foreseeable distribution components.
 - Unless the economic propensity analysis in the study excludes the SGIP and ITC program incentives, the calculation of the total number potential adopters is flawed because it underestimates the cost of BTM adoption since those incentives will not be available when the PTC is issued and the substation constructed.
- J-317
- J-318
- J-319
- J-320
- Achieving estimated adoption propensity would require a significant incentive to influence customer behavior. It seems reasonable for cost-comparison purposes to assume that the total dollars for an incentive program would be equivalent to the \$18.5 million estimated unit cost of the Proposed Project’s distribution components. Using that figure, under the low BTM adoption propensity scenario the \$18.5 million incentive would be divided among 17,000 customers, which equals approximately \$1,100 per customer, or \$881 per person if divided among 21,000 customers. This amount of incentive does not seem like it would drive the high level of market participation estimated by the BTM Analysis.

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Comments on the Behind-the-Meter Analysis

- Peak Period of Use and Peak Period of Solar Generation Do Not Align**
 J-321 Table 4 on page 15 estimates that the BTM solar contribution for 17,000 customers during the peak demand period is approximately 88 MW or roughly 5.2 kW per customer. Based on our review, the *average* residential solar PV system generates approximately 5-6 kW per customer. The Paso Robles DPA peak electrical demand period is between 5-7 PM in the summer. The PVWatts program shows on July 8, 2020, an average residential solar system in Paso Robles would output approximately 5 kW, at noon 0.74 kW at 5pm, 0.15 kW at 6pm, and 0 kW at 7pm. In other words, Table 4 assumes that peak solar output occurs during the peak demand period, which is incorrect. Based on the PVWatts program values, at 5pm the 17,000 assumed BTM adopters with 0.74kW solar output each would generate 12.6 MW total, declining to 0 MW by 7 PM, which is far less than the 88 MW estimated by the BTM Analysis. In addition, the residential solar output would be so low from 5-7 PM that the residential load would likely consume all the solar output, leaving nothing left to export to the grid.
- Feeder Capacity Issues Limit BTM Adoption Potential**
 J-322 The BTM Analysis states that Paso Robles Feeder 1107 “has the potential for BTM storage adoption of 9.5MW/18.7MWh under the high scenario, and that Paso Robles Feeder 1102 ...” has the potential for adoption of 7.3MW/14.3MWh of BTM storage under the high scenario” (p. 21). In addition, Table 7 provides the following BTM storage adoption propensity regarding three other Paso Robles feeders under the high adoption scenario: Circuit 1104 has 10.9 MW, Circuit 1106 has 18.8 MW, and Circuit 1108 has 14.9MW.
- J-323 The study overestimates the maximum feeder capacity of these circuits in most instances. The Paso Robles circuits are all 12 kV feeders. The maximum capacity of a 12 kV feeder is roughly 12 MW, assuming that the conductor for the feeder uses PG&E's largest specified distribution conductor, which is a 715 mm all aluminum conductor (AAC). Even assuming that all of the Paso Robles circuits have a 12 MW capacity, the high BTM storage adoption propensity estimated by the study exceeds a 12 kV circuit's possible rating for Paso Robles 1106 and 1108, and between 61-79% in the other cases. Even the low BTM storage adoption scenario for Paso Robles 1106 exceeds the capacity of the highest rated 12kV circuit.
- Hosting Capacity Issues Limit Generation Potential**
 J-324 Hosting capacity refers to the ability of circuits to accept new generation. The hosting capacity analysis is flawed because it incorrectly assumes that hosting capacity can be calculated for an entire feeder, whereas actual hosting capacity functions on a segment-by-segment basis for each feeder and must be evaluated that way.
- J-325 • The BTM Analysis does not specify if or when the combination of solar and storage would be a load or generation on the grid, which would impact hosting capacity needs.
 - J-326 • PG&E compared the BTM Analysis results to PG&E's ICA map, because it is more useful when looking at a specific location rather than a general area, and it is the most conservative and therefore realistic value. The ICA data is calculated at the line section level and cannot be added across line sections or feeders because the results are dependent on each other, so there is no way to sum the total hosting capacity across the entire feeder. This makes it difficult to extrapolate a feeder-level hosting capacity to

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Comments on the Behind-the-Meter Analysis

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- J-326
cont.
- J-327
- J-328
- J-329
- compare to the BTM adoption propensity estimates provided in the study, such as Table 7. As a reasonable approach, we took the line section that had the most capacity on a particular feeder to estimate the maximum hosting capacity for the entire circuit (i.e., the value represents the highest estimate in a conservative assumption). We also note that the maximum hosting capacity PG&E ever shows for a line section is 10MW, which is the limit for a standard interconnection.
- The study does not consider PV or battery storage system interconnection or feeder operations issues when estimating BTM adoption storage propensity.
 - Paso Robles 1104 has zero hosting capacity for both generic and PV.
 - For Paso Robles 1106, ICA map indicates that highest hosting capacity for a line section on that circuit is 810kW of generic or 1010kW of PV.

Battery Storage System Issues

- J-330
- **Size and Storage.** The study assumes a battery size of 7 kW/13.5 kWh (p. 12), which is described as a “market-ready product” (p. 20). PG&E deduces, based on these specifications, that the CPUC is referring to a Tesla Powerwall 2. Battery sizes are typically reported with the maximum continuous battery power rating, which appears to be the most relevant metric for the context of this study. However, the 7kW is a peak output number and 5kW is the continuous output rating. Also noted on the Tesla web site is that the battery holds 10% in reserve upon discharge so there is only 12.2kWh available for use. To our knowledge, a battery with 13.5 kWh and 7 kW of maximum continuous power is not widely available on the market. It is unclear how sensitive the study’s findings are to these particular storage specifications, but the likely result is that the study overestimates the economic value of the batteries and overestimates the number of potential BTM adopters as well.
- J-331
- **Cost.** The study assumes a residential storage system cost of \$9,376 (p. 12). Based on data provided by storage vendors and third-party market research firms, this cost is lower than typical costs reported. For example, Tesla—a residential storage market leader—reports their 5 kW/ 13.5 kWh Powerwall 2 storage systems typically cost \$10,100-\$12,100, excluding taxes, permit fees, and other soft costs. Thus, the actual cost to purchase and install a residential storage system is higher than assumed by the study. On this basis alone, the study likely overestimates the number of potential BTM adopters.
- In addition, typical 5 kW solar systems in California after current tax incentives cost about \$13,200 (see www.solarreviews.com). Together, a residential solar-plus-battery system would likely cost between \$23,000 and \$25,000. This further emphasizes the point that the study likely overestimated the number of potential BTM adopters.
- J-332
- **Export Ability.** The BTM Analysis states that: “BTM storage systems function by either directly reducing the customer’s own grid consumption, or sending excess stored power back to the grid, often in response to a price or event signal” (p. 10). Based on information provided in Table 3, it appears that the study uses the Tesla Powerwall 2 unit as the residential battery storage unit to base its analysis on (7kW/13.5kWh unit size
- ↓

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Comments on the Behind-the-Meter Analysis

- J-332
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- matches the Tesla Powerwall 2 description). The BTM adoption propensity battery storage values in Table 4 assume each customer battery can output approximately 7 kW to the grid for the entire peak period. This is not possible since PG&E has not approved the Tesla battery, or any other battery, for export to the grid. The actual capacity reduction per customer will be the load that each battery takes off the grid. Estimated customer load for the typical PG&E system residential customer is 2kW (peak) (Figure 1-12, CEC 2014-2024 Preliminary Forecast, Electric Demand by Utility Planning Area). Even assuming that low scenario estimate that 17,000 customers would adopt BTM is correct, this would equate to a reduction of approximately 34 MW instead of the 125 MW listed in Table 4. Tables 5 and 7 are impacted by this same issue.
- J-333 ↑
- Master Control System for Home Battery Storage Systems Does Not Exist**
The BTM Analysis states that the calculated BTM storage adoption propensity is sufficient to meet the capacity needs PG&E identified in its 2019 DDOR for Paso Robles circuit 1104 and San Miguel Bank 1, assuming that the BTM storage resources “were fully charged at the start of the peak period and could be subsequently discharged in a coordinated fashion (a master control system may be required for this)” (p. 22, text and Table 9). As discussed above, PG&E has not approved the Tesla Powerwall 2 unit or any other BTM battery storage device to export power to the grid. Therefore, the study’s determination is incorrect to the extent its analysis is based on exporting power from a battery onto the grid to meet another customer’s demand, rather than simply reducing the amount of power from the grid needed by the customers that installed batteries.
- J-334 ↑
- Moreover, even if PG&E approved a battery storage system technology, such as the Tesla Powerwall 2, to discharge to the grid, the “master control system” to coordinate the discharge posited by the study does not exist at this time. While it may be technically feasible to control a large number of BTM batteries for deferral in the future, there is no off-the-shelf solution right now. PG&E is working on some of this functionality via EPIC 3.03 and to operationalize DIDF/IDER, but those are currently point solutions and not aggregator solutions.

Additional Attachments

Comment J-335: Attachment 3. Revised Air Quality Analysis

Comment J-336: Attachment 4. Revised Helicopter Noise Analysis

Note to Readers:

The materials provided as an attachment(s) have been omitted from this section because they are voluminous and do not contain specific comments on the DEIR or Recirculated DEIR. Each attachment is responded to in this section, in correspondence to the alpha-numeric code shown above, but the full attachments are provided in Section 3.4.

Response to Comment J-1

The comment provides an introduction to the remainder of the comment letter. This comment does not raise issues regarding EIR adequacy and no further response is required. This comment is noted and will be shared with the CPUC's decisionmakers.

Response to Comment J-2

Thank you for your comment. This comment does not raise issues regarding EIR adequacy and no further response is required. This comment is noted and will be shared with the CPUC's decisionmakers.

Response to Comment J-3

The comment provides background information on the Proposed Project. This comment does not raise issues regarding EIR adequacy and no further response is required. This comment is noted and will be shared with the CPUC's decisionmakers.

Response to Comment J-4

The comment summarizes the organization and contents of the comment letter. The comment requests that the information and proposed revisions presented in the comment letter and its Attachments 1-4 be incorporated into the FEIR. Please refer to Responses to Comments, as follows:

- **Cover letter.** Refer to Responses to Comments J-1 through J-91.
- **Attachment 1.** Refer to Responses to Comments J-92 through J-304.
- **Attachment 2.** Refer to Responses to Comments J-305 through J-334.
- **Attachment 3.** Refer to Response to Comment J-335.
- **Attachment 4.** Refer to Response to Comment J-336.

Response to Comment J-5

The comment states the Project's distribution objective should include enhanced reliability to be consistent with the fundamental underlying purpose of the Proposed Project. Please refer to Response to Comment H-26 for discussion of the Project's distribution objective and enhanced reliability. The comment further summarizes CEQA requirements regarding statements of project purposes, does not address substantive contents of the DEIR, and no further response is necessary.

Response to Comment J-6

This comment characterizes the Proposed Project's fundamental underlying purpose, which is about reinforcement with respect to "improving the reliability, capacity and flexibility of the interconnected transmission and distribution systems in the DPA [Distribution Planning Area]." The comment objects to the CPUC's characterization of the Proposed Project's purpose and objectives in the EIR, particularly with respect to omitting distribution service reliability as a fundamental driver of the project. This comment raises similar concerns to Comment H-26.

Please refer to Response to Comment H-26 for discussion of the CPUC's authority as the CEQA Lead Agency to independently evaluate a project and develop objectives for the CEQA analysis.

Response to Comment J-7

The comment describes how the Proposed Project would meet reinforcement goals. This comment does not raise issues regarding EIR adequacy and no further response is required. This comment is noted and will be shared with the CPUC's decisionmakers.

Response to Comment J-8

This comment states the EIR should factor distribution reliability into its comparison of Alternatives BS-2 and BS-3 to the reasonably foreseeable distribution components and purports to quote a section of the DEIR. The footnote of this comment discusses how the DEIR "pulls extensively" from the PEA Appendix G and provides outage data and statistics that highlight the service reliability issues that exist. Please refer to Response to Comment H-26 for discussion of this issue.

Response to Comment J-9

This comment purports to quote the DEIR regarding the location and design of the Estrella Substation which would allow for long feeders to be split in half to solve the existing undesirable reliability issues. This comment does not raise issues regarding EIR adequacy and no further response is required. This comment is noted and will be shared with decisionmakers.

Response to Comment J-10

This comment provides additional information regarding the distribution reliability benefits of the Proposed Project, as summarized from Appendix G to the PEA. This comment does not raise issues regarding EIR adequacy and no further response is required. This comment is noted and will be shared with decisionmakers.

Response to Comment J-11

This comment states that the Distribution Objective of the Proposed Project should specifically include "improve service reliability." Please refer to the Response to Comment H-26. As discussed in that comment response, the CPUC has the authority to independently evaluate a project and develop objectives for the purposes of the CEQA analysis. The CPUC has reasonably determined that its Project objectives, as included in Chapter 2, *Project Description*, in Volume 1 of the FEIR, are appropriate and capture the fundamental drivers/objectives of the Proposed Project.

Response to Comment J-12

This comment states that the EIR should discuss whether Alternatives BS-2 or BS-3 would enhance distribution reliability and rectify existing undesirable conditions. The comment alleges deficiencies of a battery storage/distributed energy resources (DER) approach to the identified distribution issues, including that batteries: would not reduce the length of the long feeders; would not create backties into existing circuits to enable load transfers; and may hinder operational flexibility and reliability since they must be recharged to support load.

As described in Response to Comment H-26, the CPUC has reasonably determined that its Project objectives are appropriate and stands by its determination that the issue of long feeders and poor service reliability was not one of the primary drivers of the Proposed Project. As such, it determined that Alternatives BS-2 and BS-3 would achieve the Distribution Objective, as defined in Chapter 2, *Project Description*, in Volume 1 of the FEIR. As alluded to in the comment, the EIR in Chapter 2 describes the existing distribution reliability issues and how the Proposed Project would correct these deficiencies. Please refer to the comparison of alternatives in Chapter 5, *Alternatives Analysis Summary and Comparison of Alternatives*, in Volume 1 of the FEIR, which discusses the environmental effects associated with the different alternative combinations and the Proposed Project.

Response to Comment J-13

This comment alleges the DEIR does not contain substantial evidence to conclude that Alternatives BS-2 and BS-3 are environmentally preferable to the reasonable foreseeable distribution components. The CPUC disagrees with this contention, as described in Master Response 5.

Response to Comment J-14

This comment purports to quote the DEIR regarding its discussion that Alternatives BS-2 and BS-3 are evaluated for illustrative purposes. Please refer to Master Response 5.

Response to Comment J-15

This comment states that the DEIR finds that the impact determinations of Alternatives BS-2 and BS-3 would be speculative. Please refer to Master Response 5.

Response to Comment J-16

This comment alleges that the DEIR lacks substantial evidence to conclude that Alternatives BS-2 and BS-3 would be environmentally preferable to the reasonably foreseeable distribution components. The comment further claims that the DEIR cannot compare actual impact findings regarding the reasonably foreseeable distribution components to speculative assessments of the impacts of Alternatives BS-2 and BS-3 to conclude that these alternatives are environmentally preferable. For a Response to Comments regarding the consideration of battery storage alternatives, please refer Master Response 5 in Chapter 2, *Master Responses*, in Volume 3 of the FEIR.

Response to Comment J-17

This comment requests that the EIR include details on future decision-making action by the CPUC on this proceeding in regards to how Alternatives BS-2 and BS-3 may or may not be implemented via the Distribution Investment Deferral Framework (DIDF). Fundamentally an EIR is an informational document to disclose the potential environmental impacts of the proposed project and consider the environmental impacts of potential alternatives, not to formalize decision-making pathways. Because decisions on whether Alternatives BS-2 and/or BS-3 will or will not be approved, and the precise form of that decision rests with the Commission, further detailed direction within the EIR is inappropriate.

This was previously explained on DEIR page 3-131 (now page 3-133 in Volume 1 of the FEIR) as part of the description of Alternative BS-2. The following text has been added to the description of Alternative BS-2 on page 3-133 in Volume 1 of the FEIR to further clarify and reiterate this uncertainty:

...solutions would be speculative and outside the scope of this CEQA analysis. Ultimately, the precise method for implementing Alternative BS-2, if selected, will be determined by the Commission. Multiple approaches are possible, including, but not limited to, directly ordering development of the alternative, ordering filing via the DIDF as needs arise, or ordering a proceeding-specific programmatic decision-making approach via advice letter filings.

The following text has been added to the description of Alternative BS-3 on page 3-136 in Volume 1 of the FEIR to further clarify and reiterate this uncertainty:

While this section highlights the DIDF process as a viable approach for implementation, ultimately, the precise method for implementing Alternative BS-3, if selected, will be determined by the Commission. Multiple approaches are possible, including, but not limited to, directly ordering development of the alternative, ordering filing via the DIDF as needs arise, or ordering a proceeding-specific programmatic decision-making approach via advice letter filings.

Response to Comment J-18

This comment requests that no findings regarding Alternatives BS-2 and BS-3 be included in the FEIR and reiterates Comment J-16. The CPUC disagrees with this request. Please refer to Responses to Comments J-16 and J-17 for further explanation.

Response to Comment J-19

This comment does not raise issues regarding EIR adequacy and no further response is required. This comment is noted and will be shared with decisionmakers. Thank you for your comment.

Response to Comment J-20

This comment requests revision of language on pages ES-13 and 5-16 (refer to Volume 1 of the FEIR) to be consistent with the CPUC's DIDF, substituting the word "evaluated" for "developed." This revision has been implemented in both places of the EIR referenced in the comment. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, for the revised text.

Response to Comment J-21

This comment reiterates information from Chapter 3, *Alternatives Description*, of the DEIR (now on page 3-136 of Volume 1 of the FEIR) and alleges the CPUC's DIDF is technology agnostic. As was explained on page 3-136, the CPUC has included Alternatives BS-2 and BS-3 as feasible alternatives which the CPUC may directly order, or may serve as representatives of future DER procurements via the DIDF.

Response to Comment J-22

This commenter agrees that DER alternatives, including non-BESS alternatives, would be potentially evaluated and procured in the DIDF. The commenter reiterates their opinion that findings on Alternatives BS-2 and BS-3 are inappropriate because of potential future DIDF procurement. Please refer to Response to Comment J-17 and Master Response 5 regarding the appropriateness of including BS-2 and BS-3 as alternatives.

Response to Comment J-23

The commenter argues that findings on Alternatives BS-2 and BS-3 are inappropriate because no specific sizing for the BESSs is provided. The commenter notes that specific sizing of appropriate BESSs would be determined in the future as it relates to future capacity needs as would be detailed in the commenter's Grid Needs Assessment (GNA) and Distribution Deferral Opportunity Report (DDOR) to be prepared as part of the DIDF. The CPUC disagrees with the commenter's assertions regarding the findings on Alternatives BS-2 and BS-3. Please refer Response to Comment J-17 and Master Response 5.

Response to Comment J-24

The commenter states that the DEIR mischaracterizes the capacity needs disclosed in the 2020 GNA and DDOR as reducing, but that instead the capacity need has become more urgent requiring an emergency expansion of the San Miguel Substation rather than seeking the reasonably foreseeable distribution components, or a DER procurement through the DIDF. While the referenced text from Chapter 3, *Alternatives Description*, is factually correct, this comment is noted, and a revision has been made on page 3-128 in Volume 1 of the FEIR to clarify that "the distribution capacity need that is eligible for consideration in the DIDF no longer exists within the 10-year planning horizon (PG&E 2020a)." The revised text is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR.

Response to Comment J-25

The commenter argues that the \$18.5 million figure provided as a cost estimate is a unit cost, rather than the equivalent to a cost cap, as used in the DIDF. The comment also states that the cost cap for any DIDF procurement action would be developed at the time of the DIDF procurement, rather than at this time. The commenter argues that inclusion of the current cost estimate of the reasonably foreseeable distribution elements is inaccurate to the actual future costs and is not relevant to CEQA. The commenter requests deletion of this cost estimate from Chapter 5 of the DEIR.

While the CPUC agrees, and even explains in the sentence preceding the commenter's quote from Chapter 5 of the DEIR, that if Alternatives BS-2 and/or BS-3 are ordered via the DIDF procurement process, cost caps would be developed for each distribution element as the need arises. The CPUC disagrees with the commenter that the cost estimate of the reasonably foreseeable distribution elements is inappropriate, and believes that it is relevant for comparative decision-making purposes as the unit-cost of the reasonably foreseeable distribution elements in 2019 dollars, similar to the costs provided throughout the EIR.

In response to this concern, the CPUC has revised the text in Chapter 5, *Alternatives Analysis Summary and Comparison of Alternatives*, page 5-16, in Volume 1 of the FEIR to read:

~~For If~~ Alternative BS-2 and BS-3 ~~are to be developed~~ evaluated through the DIDF, the cost cap would be less than ~~this amount~~ the cost estimate for the distribution component under consideration, since the DER solution needs to be cost-effective. The cost estimate would be developed as part of the filing in the DIDF process at the time the need arises, reflecting updated costs and the costs of only the needed component(s).

The revised text is also provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR.

Response to Comment J-26

This comment introduces what PG&E characterizes as its key concerns with the DEIR's analysis of Alternative BS-3 and the supporting study, "Behind-the-Meter Solar Plus Storage Adoption Propensity Analysis" (BTM Analysis). The comment states that PG&E provides detailed comments on the BTM Analysis in Attachment 2 to its comment letter. This comment is noted. CPUC provides its detailed responses to PG&E's comments on the BTM Analysis in response to Attachment 2, which includes Comments J-305 to J-334. Certain aspects of the BTM Analysis comments are also addressed by Master Response 5.

Response to Comment J-27

This comment alleges that the BTM Analysis is speculative and does not contain substantial evidence for the findings made. Please refer to Master Response 5.

Response to Comment J-28

This comment claims that the BTM Analysis overestimates the number of customers in the DPA. Please refer to Response to Comment J-306.

Response to Comment J-29

This comment contends that the hosting capacity analysis provided in the BTM Analysis is flawed. Please refer to Responses to Comments J-324 through J-329.

Response to Comment J-30

This comment claims that the BTM Analysis incorrectly assumes that BESSs would be able to discharge energy to the PG&E distribution system. Please refer to Response to Comment J-332.

Response to Comment J-31

This comment states that the master control system that the BTM Analysis and DEIR "hypothesize would be needed" to discharge energy does not exist at this time. Furthermore, the comment states that this master control system is not described or evaluated in the BTM Analysis. Exact locations of BESS facilities would need to be known for this analysis. Please refer to Responses to Comments J-333 to J-334.

Response to Comment J-32

This comment reiterates the commenter's opinion that the BTM Analysis in the DEIR does not constitute substantial evidence in support of Alternative BS-3. The BTM Analysis that was included in the EIR ("BTM Solar Plus Storage Adoption Propensity Analysis Report"; refer to

Appendix B to Appendix B, *Final Alternatives Screening Report*, in Volume 2 of this FEIR) was prepared by Kevala Analytics, Inc. in 2020. “Substantial evidence” is defined in CEQA Guidelines Section 15384 as “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached...” Further, Section 15384(b) states “substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” The BTM Analysis clearly meets this definition as it constitutes the expert opinion of Kevala Analytics, Inc. based on the facts presented in the analysis. The CPUC considers this report to provide substantial evidence showing there is a “significant potential for BTM storage adoption in the Paso Robles DPA as a whole and on Paso Robles feeders specifically,” which supports Alternative BS-3. Please also refer to Responses to Comments J-305 through J-334 and Master Response 5.

Response to Comment J-33

This comment requests that Chapters 2, 4, and 5 of the DEIR be revised to clarify that the ultimate substation buildout is speculative and not included in the CEQA review of the Proposed Project. This comment states that space has been reserved at the proposed substation to preserve the option of future expansion; however this expansion is not designed or planned and may not even occur. Therefore, the comment states that ultimate substation buildout is not reasonably foreseeable.

The CPUC acknowledges that the ultimate buildout of the substation is not fully developed and depends on future energy demand and therefore may not be built. However, there is enough information to include this future buildout as part of the description of the Proposed Project. The location of the buildout has been identified and preserved, the purpose and objectives of the expansion are known, the anticipated layout has been provided, and the general design/components/equipment can be reasonably assumed. One of the primary purposes of CEQA is disclosure of potential, significant environmental impacts of a project to the public and decisionmakers. “Drafting an EIR ... necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.” (CEQA Guidelines, § 15144.) Thus, it is appropriate for the EIR to disclose the potential ultimate buildout of the Estrella Substation and evaluate the environmental effects of that buildout to the extent possible.

Response to Comment J-34

This comment provides additional information on why the commenter believes the DEIR should be revised to clarify that the ultimate substation buildout is speculative and not included in the CEQA review of the Proposed Project. The comment includes information from *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 738 (“*Kings County*”) that states: “Where future development is unspecified and uncertain, no purpose can be served by requiring an EIR to engage in sheer speculation as to future environmental consequences.”

Although omitted by the commenter, *Kings County* also states: “We conclude *Laurel Heights* requires an analysis of the environmental effects of future expansion or operation if there is credible and substantial evidence that (1) it is a reasonably foreseeable consequence of the initial project and (2) the future expansion or operation will likely change the scope or nature of the initial project or its environmental effects. [citation omitted].” (*Kings County, supra*, 221

Cal.App.3d at p. 738.) The CPUC has reasonably concluded that there is enough credible and substantial evidence to determine that this expansion is reasonably foreseeable (even if 20 years from now) and would affect the project's environmental impacts. Please refer to Response to Comment J-33.

Response to Comment J-35

This comment states that the DEIR proposes two project alternatives (PLR-3A and PLR-3B) that would add a strategic underground section of the Proposed Project's new 70kV power line through the Golden Hill Road area of Paso Robles around San Antonio Winery. The comment states that impacts to aesthetics from power lines is the reason for undergrounding these portions; however, the comment asserts that undergrounding could have more significant impacts because of the transition stations that would be required for the alternatives. As discussed in Master Response 8, "alternatives described in an EIR must reduce or eliminate one or more of the significant impacts of the proposed project (although the alternative could have greater impacts overall)." Table 5-1, in Chapter 5, *Alternatives Analysis Summary and Comparison of Alternatives*, in Volume 1 of the FEIR explains where environmental impacts of Alternative PLR-3 compared to the Proposed Project are increased or reduced. The comment notes that residents in the area of the northern transition station would not only be burdened by the transition station, but also by the loss of trees and other vegetation along the underground circuit routes.

This comment raises similar points as Comment J-64 later in the comment letter. In response to Comment J-64, the EIR's analysis of the aesthetics impacts from Alternative PLR-3 has been revised to provide further information on the visual effects of the transition stations and to describe the effects of removing oak trees due to the northern transition station in greater detail. Please refer to Response to Comment J-64 for additional information and for the revised text.

Response to Comment J-36

This comment introduces the commenter's additional concerns regarding undergrounding sections of high-voltage transmission lines (as proposed in Alternative PLR-3). This comment is noted, and the CPUC's responses to specific concerns are provided in Responses to Comments J-37 through J-45.

Response to Comment J-37

The comment states that the cost to serve a large customer from an underground transmission section of line would likely be cost prohibitive. The comment is noted and will be shared with the CPUC's decisionmakers. It does not address environmental impacts analyzed in the DEIR and no additional response is necessary.

This comment also states that serving large transmission-level block loads with hybrid lines (both above and underground) would be ill-advised for reliability concerns, which are described in more detail in Comment J-38 and J-39. This comment is noted and will be shared with the CPUC's decisionmakers.

Response to Comment J-38

This comment states that the DEIR does not provide complete information regarding the potential for lengthy fault outages associated with underground line sections. In particular, the comment provides additional information with respect to the challenges of isolating faults along an underground line, and that lengthy outages could occur even with the transition stations. This comment provides relevant information describing alternatives that has been incorporated into Chapter 3, *Alternatives Description*, pages 3-74 to 3-75, in Volume 1 of the FEIR. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. This descriptive revision does not substantively affect any of the environmental impact determinations or findings in the EIR.

Response to Comment J-39

This comment provides text from the DEIR explaining that without transition stations there could be lengthy fault outages following any circuit fault because the underground section of line would need to remain de-energized after any circuit fault and be patrolled and inspected by an underground specialist prior to reenergizing. The comment then points out that although this is true, there could be lengthy repair times even with transition stations. Please refer to Response to Comment J-38.

Response to Comment J-40

This comment states that underground lines are also vulnerable to dig-ins from excavations or directional drilling; and that if a dig-in took an underground line out of operation, the repair would take a minimum of 4 weeks. This comment provides helpful information, but due to the uncommon nature of these events, as admitted by the commenter, any such future dig-ins affecting Alternative PLR-3 are possible risks for the operation of Alternative PLR-3; however, the potential risk does not render the alternative infeasible for the purposes of CEQA. The potential environmental impacts resulting from a fault event and the repair of the failure are too speculative to be considered within the EIR. Therefore, the CPUC has reasonably determined that this information is not pertinent to the EIR, as the limited potential risk to the operation of the alternative does not alter any of the environmental impacts of the alternative. The CPUC will consider the whole of the record, including these comments on the DEIR, in determining whether or not to approve the Proposed Project and/or one or more of the alternatives for construction.

Response to Comment J-41

This comment states that the DEIR does not address whether there is adequate space along the proposed undergrounding routes to ensure at least 15 feet between duct banks and manholes, which is mandatory to safely operate the lines. PG&E states that they evaluated conductor spacing based on the available aboveground utility markers as part of the feasibility review, but did not conduct pot-holing to validate if there are any subsurface conflicts. This comment is noted and will be shared with the CPUC's decisionmakers. According to CEQA Guidelines Section 15126.6(a), alternatives considered in an EIR need only be potentially feasible. The definition of feasibility is provided in CEQA Guidelines Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Based on the substantive evidence

available to the CPUC, the CPUC has reasonably concluded that Alternative PLR-3 is potentially feasible and thus it is proper to include it for detailed analysis in the EIR.

Response to Comment J-42

This comment states that construction of a double-circuit, 70 kV line (as proposed under Alternative PLR-3) will significantly extend the construction schedule, creating additional environmental impacts. The CPUC assumes the commenter is making these comparisons against the same segment of the Proposed Project 70 kV power line. The EIR discusses the timeline for construction of Alternative PLR-3 in Table 3.10 in Chapter 3, *Alternatives Description*, in Volume 1 of the FEIR. It assumes that construction of Alternative PLR-3 would take 12 months. On page 4.3-33, of Section 4.3, “Air Quality,” in Volume 1 of the FEIR, the FEIR states that Alternative PLR-3 “would require a slightly longer construction duration compared to the project for the 70kV powerline segment that would be buried underground. Construction of Alternative PLR-3 (both options) would require a total of 12 months compared to ~~10-11~~ months for the entire overhead new 70 kV power line segment.” This longer construction schedule was considered throughout the analysis of this EIR. Note that the construction duration for the new 70 kV power line segment was updated to 11 months as part of the Recirculated DEIR. This revision has been carried over to the FEIR.

The comment also states that underground line construction requires three main phases, with construction of one circuit being completed before construction of the second circuit is begun. The commenter discusses these phases in Comment J-43. Refer to Response to Comment J-43.

Response to Comment J-43

This comment provides detailed information on how PG&E would install the trenches and duct banks under Alternative PLR-3. The comment describes the three main phases and the order of construction activities that would need to occur, equipment used to break up concrete and dewatering of trenches, materials used, and approximate dimensions of the various trenches. This comment provides relevant information that has been incorporated into Chapter 3, *Alternatives Description*, pages 3-75 to 3-76, in Volume 1 of the FEIR. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. None of the added descriptive details substantially alter the environmental impacts previously disclosed in the DEIR.

Response to Comment J-44

This comment recognizes that the DEIR accurately reflects the duration of construction of the underground segment (Alternative PLR-3) as taking approximately one year. The comment notes that construction of the Alternative PLR-3 underground segment would add approximately 9-12 months to the overall Project construction schedule compared to the Proposed Project, and states that traffic, air quality, noise and other construction impacts associated with construction of the alternative would be shared by residents and businesses in the area. This comment is noted and will be shared with the CPUC’s decisionmakers.

Response to Comment J-45

The comment claims that Table 5-3 in the DEIR misrepresents the cost of Alternative Combination #1 (With Undergrounding). The comment notes that the segment would be 1.2 miles and not 1.1 miles. Additionally, the commenter believes the estimate in Table 5-3 was

based on a single-circuit, not a double-circuit construction, and thus the estimate should be twice as high.

While the CPUC acknowledges PG&E's expertise in this area, several of the undergrounding cost per mile estimates relied upon in the EIR (refer to Footnote 2 to Table 5-3) specify that the range provided includes double-circuit construction (e.g., Southern California Edison [SCE] 2019 and San Diego Gas & Electric Company [SDG&E] 2019). As such, the cost estimate in the EIR is reasonable for double-circuit construction, including the 70 kV power line under Alternative PLR-3. However, language has been added to Footnote 2 to Table 5-3 to indicate the potential for higher costs, based on PG&E's comments. The additional language is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is also shown below.

2. The assumed cost per mile for undergrounded 70 kV power line is based on the range of estimates (middle point between highest and lowest) from PG&E, Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E), and Edison Electric Institute's (2013) publication "Out of Sight, Out of Mind," which are shown below. Portions of the Alternative Combination ~~#2~~^{#1} undergrounding segment would likely be considered urban, while other portions would be considered rural. The range of estimates includes those for double-circuit construction. However, PG&E has claimed that since the underground segment would be a double-circuit, 70 kV power line, with each circuit installed in a separate trench, the cost per mile should be multiplied by two. If PG&E's recommendations were followed, the cost per mile for the undergrounded 70 kV power line would be \$35,410,000 and the cost estimate for the 1.2-mile undergrounded segment under Alternative Combination #1 would be \$42,492,000, bringing the total cost estimate for that alternative combination to \$65,453,200, or 149% more than the Proposed Project.

The cost estimate for Alternative Combination #1 in Table 5-3 has also been adjusted to account for the 1.2-mile length (instead of 1.1-mile) of the underground segment, which PG&E has correctly pointed out. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, for the revised numbers.

In addition, the comment states that the high cost to install underground transmission lines is unwarranted in this case and would be an unfair burden on ratepayers. The comment is noted and will be shared with the CPUC's decisionmakers. It does not address environmental impacts analyzed in the DEIR and no additional response is necessary.

Response to Comment J-46

This comment argues that mitigation measures in the EIR should not apply to the reasonably foreseeable distribution components, since the Proposed Project applicants are not seeking authority to construct these components under the Permits to Construct (PTCs) from the CPUC. Specifically, the comment states that Mitigation Measure HYD/WQ-1 should be deleted and reference to the reasonably foreseeable distribution components ("RFDC") in the MMRP should be removed.

This comment is noted; however, it is appropriate to prescribe mitigation measures for the reasonably foreseeable distribution components, as these components were evaluated in

sufficient detail in the EIR to render significance conclusions. The reasonably foreseeable distribution components were also described in the Applicants' PEA; indeed, the PEA acknowledged: "These new distribution facilities are considered a reasonably foreseeable consequence of the proposed project for California Environmental Quality Act (CEQA) review purposes..." (PEA, p. 2-4). As the Lead Agency, the CPUC is obligated under CEQA to evaluate the impacts of the Proposed Project, including any reasonably foreseeable consequences of the project.

Response to Comment J-47

This comment questions the EIR's threshold for determining impacts to agricultural lands. The comment lists the amount of Important Farmland conversion that would be caused by the Proposed Project¹ and implies that the CPUC should have used a less conservative threshold (i.e., not interpret the CEQA Guidelines Appendix G checklist question literally such that "any amount greater than zero acres of permanent conversion of Prime Farmland, Unique Farmland or Farmland of Statewide Importance is a significant impact"). Finally, the comment describes that lead agencies are not required to use any of the questions in the Appendix G checklist as standards of significance and may develop their own thresholds instead.

This comment raises similar concerns/points as Comment H-12. Please refer to Response to Comment H-12 for CPUC's detailed response to these issues.

Response to Comment J-48

This comment states that the threshold used to determine a significant and unavoidable impact to agricultural resources is not consistent with past thresholds used by the CPUC. The comment argues that for other siting proceedings the CPUC has applied a standard of significance for permanent impacts to agricultural resources based on the Williamson Act's declaration that farmland is large enough to sustain agricultural use if it is at least 10 acres of Prime Farmland or at least 40 acres for land that is not Prime Farmland. The comment lists a number of projects/CEQA documents in which different thresholds of significance for agricultural resources have been used.

Please refer to Response to Comment H-12. As described in this comment response, the CPUC has authority to use a more conservative threshold of significance in its evaluation of the Proposed Project.

Response to Comment J-49

This comment reiterates the commenter's contentions with the significance threshold used in the EIR for impacts related to conversion of Important Farmland to nonagricultural uses. Please refer to Response to Comment H-12.

¹ The amount of Farmland conversion listed in this comment has since been revised based on the larger substation parcel and reconfigured substation layout. These changes were included in a revised Section 4.2, "Agriculture and Forestry Resources," that was circulated as part of the Recirculated DEIR. Comment Letter J was submitted prior to the recirculation and thus the conversion acreages described in the comment letter do not reflect the current information.

Response to Comment J-50

This comment reiterates the commenter's disagreement with the CPUC's use of a "greater-than-zero" threshold for impacts to agricultural land in the EIR. This comment is noted and will be shared with the CPUC's decisionmakers. Please refer to Response to Comment H-12.

Response to Comment J-51

This comment states that conservation easements are appropriate and available to mitigate significant impacts from the loss of farmland. Therefore, the comment asserts that the EIR is mistaken in concluding that Mitigation Measure AG-1 would not reduce the Farmland conversion impacts (which the commenter disagrees are significant) to a less-than-significant level. The CPUC believes it has made the correct determination in its finding with respect to Mitigation Measure AG-1. As stated on page 4.2-13 in Volume 1 of the FEIR: "Implementation of this mitigation measure [AG-1] would help ensure protection and preservation of high-quality agricultural lands elsewhere in the county; however, this compensatory mechanism would not fully offset the significant impact because it would not create any new Important Farmland (rather, it would protect existing agricultural land)." Therefore, this comment is noted and no changes to the EIR are required.

Response to Comment J-52

This comment states that the DEIR fails to account for Unique Farmland and Farmland of Statewide Importance that would be restored following the removal of the existing distribution poles and the existing 230 kV tower located in the general vicinity of the proposed Estrella Substation that would occur as part of the Proposed Project. The comment provides the square footage/acreage of Farmland that the commenter claims would be restored based on removal of the existing structures. Although, the land around these existing distribution poles and 230kV tower may have once operated as agricultural land, it has not been operated as agricultural land for a number of years². The Proposed Project Applicants have not explained in the PEA or elsewhere whether the land surrounding these locations would be actively farmed again, nor to what quality of soil/agricultural quality these locations might be restored. Therefore, this comment does not provide sufficient evidence to require changes to the DEIR text for the FEIR.

Response to Comment J-53

This comment provides language from Section 15370(e) of the CEQA Guidelines that was revised on December 28, 2018, which specifically included "permanent protection of such resources in the form of conservation easements" under the definition of mitigation. The comment argues that conservation easements are an acceptable form of mitigation for lost resources and/or environments, implying that the EIR is incorrect in finding that Mitigation Measure AG-1 would not reduce the Proposed Project's impacts to Farmland to a less-than-significant level.

This comment is noted and will be shared with the CPUC's decisionmakers. The CPUC acknowledges the 2018 changes to the CEQA Guidelines listed in the comment; however, it is

² The existing 230 kV towers adjacent to the Estrella Substation site, for example, (one of which would be removed as part of the Proposed Project construction) appear to have been present since at least 1995, based on Google Earth imagery.

the CPUC's responsibility as CEQA lead agency to independently evaluate a project's impacts in light of the project-specific circumstances and determine whether any feasible mitigation is sufficient to reduce impacts to less than significant. In the case of the Proposed Project, the CPUC determined that establishment of conservation easements/contribution to the California Farmland Conservancy Program via Mitigation Measure AG-1 would not reduce the permanent Farmland conversion impacts to a less-than-significant level, but is nonetheless an applicable mitigation measure.

Response to Comment J-54

This comment argues that the EIR's approach with respect to Mitigation Measure AG-1 (i.e., that it will not reduce impacts to less than significant) will establish a precedent that will trigger the need for an EIR for numerous future projects that convert any measurable amount of Prime Farmland, Unique Farmland or Farmland of Statewide importance. The comment lists the revised definition of mitigation in the CEQA Guidelines, statements by the California Natural Resources Agency in its Final Statement of Reasons (FSOR) (refer to this point discussed in Response to Comment J-57), observations by the CDOC (also discussed in Response to Comment J-57), and the "far reaching consequences of maintaining the current analysis" as reasons why the CPUC should revise its stance regarding conservation easements for mitigating impacts from conversion of Farmland. The CPUC has the authority to determine the effectiveness of a given mitigation measure on a project-by-project basis. It has articulated its reasons for doing so with respect to Mitigation Measure AG-1 in the EIR.

Response to Comment J-55

This comment states that although the commenter disagrees with the threshold used in the EIR's agricultural resources impacts analysis and the significant and avoidable finding even with mitigation included, the commenter (as one of the Applicants) will implement Mitigation Measure AG-1. The commenter's general disagreement with the methodology used is noted and will be shared with the CPUC's decisionmakers. No further response is required.

Response to Comment J-56

This comment states that, to the extent that Mitigation Measure AG-1 is required, the commenter agrees with the comments by HWT regarding text changes to Mitigation Measure AG-1 to make it more practicable and effective. Specifically this comment requests changes that would allow HWT and PG&E to utilize other programs and methods to achieve comparable conservation easements for farmland. This comment raises similar points to Comment H-15, and the proposed revisions to Mitigation Measure AG-1 that were provided in Comment H-16. Please refer to the responses to these comments for the CPUC's detailed response.

Response to Comment J-57

This comment provides additional information to support the commenter's claim that conservation easements are appropriate and available to mitigate significant impacts from the loss of farmland. This comment provides language from the California Natural Resources Agency's FSOR document, which states that: "The court stated that although such easements do not replace lost onsite resources, they 'may appropriately mitigate for the direct loss of farmland when a project converts agricultural land to a nonagricultural use....'" (FSOR p. 93.) The comment also provides language from the Department of Conservation indicating that

conservation easements are an available and acceptable mitigation tool that may serve as “partial compensation for the direct loss of agricultural land.”

The CPUC appreciates the commenter’s provision of relevant information regarding the acceptability of conservation easements as mitigation for permanent loss of agricultural land caused by a project. The CPUC notes that significance thresholds and mitigation for conversion of agricultural land are topics in which there are varying perspectives. The CPUC’s CEQA approach pertaining to this matter, for this project, is unchanged. The Department of Conservation’s statement regarding conservation easements serving as partial compensation for the direct loss of agricultural land is consistent with the CPUC’s finding in the EIR that Mitigation Measure AG-1 would not reduce the Proposed Project’s impacts on Important Farmland below the level of significance.

Response to Comment J-58

This comment provides the commenter’s proposed revisions to Mitigation Measure AG-1. These are the same text revisions that are proposed in Comment H-16. Please refer to Response to Comment H-16 for CPUC’s detailed response. As indicated in Response to Comment H-16, the CPUC has accepted these proposed revisions, with modifications, for the FEIR.

Response to Comment J-59

The comment describes the Applicants’ rationale for selecting the proposed 70 kV power line route within the Golden Hill Road area, which is generally a commercial/industrial area. The comment states that overhead power lines are common features within commercial/industrial areas and generally align with viewer expectations, resulting in less severe changes to visual character and quality than if constructed in a more rural area that tends to lack engineered structures. The Applicants note that the alignment was strategically selected to avoid sensitive viewers to the maximum extent possible and was further modified to potentially avoid visually sensitive land uses such as the San Antonio Winery.

The CPUC appreciates this background information about how the Applicants formulated the proposed 70 kV power line route in the Golden Hill Road area. As the comment does not include any substantive comments on the DEIR’s adequacy, no further response is required.

Response to Comment J-60

The comment correctly describes the EIR’s conclusions that the portion of the proposed 70 kV line running north of San Antonio Winery parallel to Golden Hill Road would cause a significant and unavoidable aesthetic impact, citing the area’s moderate-to-high visual quality, lack of existing power line infrastructure, and presence of the Cava Robles RV Park property as supporting evidence.

As the comment does not include any substantive comments on the DEIR’s adequacy, no further response or revisions to the DEIR text are required.

Response to Comment J-61

The comment states that while the area north of the San Antonio Winery has moderate-to-high visual quality and lacks existing power line infrastructure, the presence of the Cava Robles RV Park in the vicinity of the proposed route should not be a basis for determining visual

significance. The comment notes that significance criterion “c,” used in the aesthetics analysis in the EIR, only protects public views. The comment asserts that because Cava Robles RV Park is a private recreational facility, it should not be a factor in the EIR’s determination of significance. Lastly, the comment asserts that because the power line would be sited outside the RV park’s property, the CPUC should not factor in the land use designation of the Cava Robles RV Park in the EIR’s determination of significance.

This comment correctly cites language from the EIR, which clarifies that for criterion c, the aesthetics impact analysis focuses on substantial adverse effects on the visual character or quality of public views of the site and its surroundings. The commenter also correctly points out that the proposed power line would be sited outside (although adjacent to) the Cava Robles RV Park’s property. While the CPUC acknowledges the commenter’s point, the land use designation of the land adjacent to the proposed 70 kV power line route is relevant information for the aesthetics analysis. The EIR does not solely rely on this land use designation to reach its conclusion of significant and unavoidable for the impacts under significance criterion c.

Response to Comment J-62

The comment states that the removal of Cava Robles RV Park from consideration in the aesthetics analysis would leave only the moderate-to-high visual quality of the area and lack of existing power line infrastructure along Golden Hill Road as the sole determinants of the DEIR’s aesthetics impact determination (for Impact AES-3). The comment states that the significant impact identified at KOP 6 should be weighed against the entire proposed route and disagrees with the CPUC’s significant and unavoidable impact determination.

The visual quality of the northern portion of Golden Hills Road is considered moderate-to-high given the area’s open space and rural character which is shown in KOP 6. (FEIR, Volume 1, Figure 4.1-7.) As the comment indicates, introducing large power line infrastructure to this area where such infrastructure does not currently exist would substantially alter the visual character and quality of public views from Golden Hill Road. Please note that additional DEIR text revisions were made to the Impact AES-3 discussion and an additional bullet was added to Mitigation Measure AES-1 in Response to Comment I-55. While it is true that this significance determination is primarily concerned with one portion of the proposed route, the CPUC has concluded that the proposed transmission line would result in a significant and unavoidable impact even with implementation of Mitigation Measure AES-1. Lastly, regarding the commenter’s disagreement with the CPUC’s significant and unavoidable impact determination, the EIR acknowledges that an assessment of visual quality is subjective and that reasonable disagreement can occur as to whether alterations in the visual character of the potentially affected area would be adverse or beneficial. (FEIR, Volume 1, p. 4.1-37.)

Response to Comment J-63

This comment states that the commenter disagrees with the EIR’s conclusion that Alternatives PLR-3A and PLR-3B (referred to collectively as Alternative PLR-3) would be environmentally preferable to construction the Proposed Project’s overhead 70 kV power line. The comment contends that the conclusion is inconsistent with the aesthetic, noise, air quality and biological resources impacts of Alternative PLR-3 identified in the EIR. This comment is noted. The commenter’s arguments with respect to each of these resources topics as they relate to the

environmental superiority of Alternative PLR-3 are expounded upon in Comments J-64 to J-68; the CPUC provides detailed responses to each of these comments below.

Response to Comment J-64

The comment first states that the EIR fails to analyze the visual impacts of the transition stations that would be constructed at each end of the underground segment associated with Alternative PLR-3. The comment then notes that the EIR does not evaluate the aesthetic impacts associated with permanently removing 0.5 acre of blue oak woodland habitat (including removal of up to 47 oak trees and the trees north of KOP 6). The comment states that the northern station would introduce industrial facilities into an area that currently lacks utility infrastructure, “a circumstance that was considered a key determinant of the EIR’s significant and unavoidable impact determination for the proposed route of overhead line.” The comment concludes that the EIR applies an inconsistent standard of review when evaluating the significance of aesthetic impacts between Alternative PLR-3 and the proposed route.

In response to the first point regarding the EIR’s aesthetics evaluation of the transition stations, please note that the EIR does discuss that Alternative PLR-3 would include “small (150-foot by 150-foot) transition stations at either end of the alignment with riser poles at each station.” (FEIR, Volume 1, p. 4.1-51.) The southern transition station would be sited near existing industrial facilities and therefore would not constitute a substantial adverse effect on this particular area’s visual character or quality. The commenter is correct in that the northern transition would introduce industrial facilities in an area that currently lacks utility infrastructure. However, the northern transition station would be sited in an area with lower viewer exposure that is primarily limited to a few private residents on Lake Place and is much smaller in scale relative to the poles that would otherwise be installed along the proposed route of overhead line. The impact discussion for Alternative PLR-3 has been augmented to describe the visual effects of the transition stations; please refer to the DEIR text revisions at the end of this response.

The comment correctly notes that the Aesthetics section mistakenly omitted an evaluation of impacts associated with removing approximately 0.5 acre of blue oak woodland habitat to the north of KOP 6. Removal of oak trees in the area north of KOP 6 could be perceived as an adverse effect on the area’s visual character and quality but would only be noticeable from nearby private residents where viewer exposure is low. Therefore, the impact would not be significant. Nevertheless, implementation of Mitigation Measure BIO-4 (Develop and Implement a Restoration Plan for Blue Oak Woodland Habitat), as described in Section 4.4, “Biological Resources,” in Volume 1 of the FEIR, would further reduce this visual effect.

In response to concerns raised in this comment, the following text on pages 4.1-50 to 4.1-51, in Volume 1 of the FEIR, has been revised to describe the visual effects of both the transition stations and oak tree removal:

Construction activities for the southern transition station and underground line could create some adverse aesthetic effects since such activities would be visible to those passing by the site. However, construction activities would not be substantial because they would be temporary, lasting for a short duration (e.g., 6 months). Neither construction nor operation of Alternative PLR-3 would ~~require or~~ result in substantial damage to scenic resources (e.g., trees, rock outcroppings, and historic buildings) within

or near the SR 46 corridor. Therefore, impacts under significance criterion B would be **less than significant**.

No overhead power lines currently occur in the Golden Hill Industrial Park and along Golden Hill Road to the north. Alternative PLR-3 was specifically proposed to avoid the significant adverse aesthetic effects of the overhead Proposed Project 70 kV power line in this area. ~~As such, this underground power line segment would completely avoid the permanent adverse effects on the visual character and quality of the Golden Hill Road area from the Proposed Project, described in Impact AES-3.~~ Alternative PLR-3 would include small (150-foot by 150-foot) transition stations at either end of the alignment with two riser poles at each station, which would introduce industrial facilities to these areas. Figure 3-11 shows representative photos of transition stations. The transition station at the southern end of the alignment would be sited near other industrial facilities and businesses and, therefore, would not substantially degrade the visual character at this location. The northern transition station would be sited on undeveloped land near homes on Lake Place and would be mostly visible to a few private residents; thus viewer exposure would be low. This alternative would also permanently impact approximately 0.5 acre of blue oak woodland habitat (including removal of approximately 47 oak trees) at the northern end of Golden Hill Road, which could be perceived as an adverse visual effect on the area's scenic character to nearby private residents and limited public views from the northern end of Golden Hill Road. Existing oak trees just outside of the Alternative PLR-3 work area would remain intact and continue serving as the primary visual feature in this area's rural landscape. On the whole, while the northern transition station would introduce minor industrial facilities and removal of blue oak woodland habitat would incrementally alter the visual character and quality of the Golden Hill Road area, these impacts would be less severe when compared to the Proposed Project's 70 kV power line due to the larger scale and industrial nature of the proposed poles that would dominate the landscape have minor, less than significant impacts on existing visual character and quality. Construction activities for Alternative PLR-3, including trenching within public roadways (Engine Way, Wisteria Lane, and Golden Hill Road), would adversely affect public views for the duration of the construction period; however, these effects would be temporary and therefore less than significant. Construction and operation of Alternative PLR-3 also would not conflict with existing zoning (Planned Industrial; which allows transmission structures). Overall, impacts under significance criterion C would be **less than significant**. Incidentally, implementation of Mitigation Measure BIO-4 (Develop and Implement a Restoration Plan for Blue Oak Woodland Habitat), as described in Section 4.4, *Biological Resources*, would require the Applicants to replace removed oak trees at the work area, in the vicinity or at a conservation bank with a service area that covers this alternative. Replacement trees planted in the vicinity of the work area would further reduce this impact.

The changes to the EIR described above would not result in changes to environmental impact analyses or conclusions presented in the DEIR, and therefore do not constitute significant new information that would trigger recirculation under CEQA Guidelines section 15088.5. Rather, the changes serve to clarify and amplify the content of the DEIR.

Response to Comment J-65

This comment suggests that the noise impacts of Alternative PLR-3 were not adequately analyzed in the EIR, as the commenter indicates that the transition stations associated with this alternative would include heating, ventilation, and air conditioning (HVAC) units that would create a permanent source of noise. Later in the comment letter, in Comment J-230, the commenter indicates that this would be a “small HVAC to keep the controls and relays cool.”

In response to this comment, the text in Chapter 3, *Alternatives Description*, page 3-75, in Volume 1 of the FEIR, has been revised to disclose that the transition stations associated with Alternative PLR-3 would each require small HVAC units. The revised text is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

The physical equipment housed inside the transition stations would include riser poles, a 115 kV bus to accommodate three current transformers, high voltage circuit breakers, a control shed with control panels, fiber optic communication equipment, current differential relays, direct current batteries, and alternating current power panels. The transition stations would each also require a small heating, ventilation, and air conditioning (HVAC) unit to keep the controls and relays cool. The transition station footprints would comprise a 150-foot by 150-foot area.

Additionally, the text in Section 4.13, “Noise and Vibration,” page 4.13-31, in Volume 1 of the FEIR, has been revised to clarify that the transition stations under Alternative PLR-3 would require an HVAC unit that would generate noise and to describe the potential impacts of this noise. The revised text is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

Once constructed, the underground power line segment would not generate any noise. ~~Likewise-However,~~ the transition stations at either end of the underground power line segment would not include transformers, HVAC units, or other equipment that would generate substantial noise when operating. A small number of sensitive receptors may be located within a distance from a transition station where noise from these HVAC units would be perceptible.

Finally, based on this comment and Comment J-230, text has been added to Section 4.3, “Air Quality,” Section 4.6, “Energy,” and Section 4.8, “Greenhouse Gas Emissions,” within Volume 1 of the FEIR, to disclose the energy consumption and associated emissions of the HVAC systems at the transition stations for Alternative PLR-3. Please refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, for the revised text. None of the significance conclusions within these sections have changed based on the effects associated with the HVAC units.

The changes to the EIR described above would not result in changes to environmental impact analyses or conclusions presented in the DEIR, and therefore do not constitute significant new information that would trigger recirculation under CEQA Guidelines section 15088.5. Rather, the changes serve to clarify and amplify the content of the DEIR.

Response to Comment J-66

The commenter states the DEIR does not adequately consider the impacts from fugitive dust and diesel particulate matter (DPM) on the Cava Robles RV Park or Circle B homeowners

association (HOA) residents for the Alternative PLR-3 variations. The commenter states that these people would be exposed for several months longer than they would during construction of the proposed above-ground 70 kV line.

The EIR evaluated the air quality impacts for alternatives in a qualitative manner, compared to the Proposed Project which was evaluated quantitatively, as CEQA does not require the same rigorous analysis for alternatives. (CEQA Guidelines, § 15126.6.) The EIR concludes that Alternative PLR-3 may have increased or decreased emissions compared to the Proposed Project depending on the specific equipment used for the similar segment areas. The EIR concludes that there will still be a significant and unavoidable impact to air quality. Note that the conclusion with respect to significance criterion c (potential to expose sensitive receptors to substantial pollutant concentrations) for Alternative PLR-3 was revised to significant and unavoidable as part of the Recirculated DEIR. The EIR now concludes that DPM emissions under Alternative PLR-3 would be more intense in duration than the Proposed Project and may expose sensitive receptors to greater health impacts, but still would be substantially similar to that for the Proposed Project (refer to FEIR, Volume 1, page 4.3-34 to 4.3-35). Even with implementation of Mitigation Measure AQ-1 requiring use of newer construction equipment that have low DPM emissions, the impact would remain significant. For further information regarding health impacts to sensitive receptors, refer to Master Response 15.

Response to Comment J-67

The commenter states that the loss of foraging habitat and its effect on special-status raptors was not analyzed in the DEIR for the northern transition station. The commenter also states that the DEIR fails to acknowledge that impacts from electrocution or collision hazards can be reduced to less than significant levels with implementation of PG&E's Avian Protection Plan.

As stated in Chapter 3, *Alternatives Description*, on page 3-75, in Volume 1 of the FEIR, the transition station footprint would compromise a 150-foot by 150-foot, or 22,500 square foot area (0.52 acre). As described in Section 4.4, "Biological Resources," construction of the transition station would result in 0.52 acre of permanent impact and 3.44 to 3.51 acres of temporary impact to blue oak woodland habitat. (FEIR, Volume 1, p. 4.4-70.) As discussed in Section 4.4 "Biological Resources," pages 4.4-46 to 4.4-47, in Volume 1 of the FEIR, blue oak woodlands provide suitable foraging habitat for nesting raptors. The text in Section 4.4, "Biological Resources," has been revised to state that blue oak woodland habitat provides foraging habitat for special-status raptors. (FEIR, Volume 1, p. 4.4-70.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

In response to comments regarding PG&E's Avian Protection Plan, please refer to Response to Comment J-82.

Response to Comment J-68

This comment states that the aesthetic, noise, air quality, and biological resources impacts of Alternative PLR-3 described in Comments J-64 to J-67 must be taken into account in the EIR. The comment further argues, based on those alleged impacts, that Alternative PLR-3 is not environmentally preferable to the Proposed Project. This comment is noted and will be shared with the CPUC's decisionmakers. Please refer to Responses to Comments J-64 to J-67 above discussing the alleged impacts to environmental resources.

Response to Comment J-69

The commenter states that updated assumptions on helicopter use and other construction details change the air quality impact determination to less than significant with mitigation. The commenter provides updated assumptions to consider for the helicopter, provided as the comment letter's Attachments 3 and 4, and other construction schedule changes. The commenter states that the DEIR does not quantify mitigated emissions and should be revised.

For CPUC's response to comments regarding construction emissions, please refer to Master Response 11. For the CPUC's response to comments regarding air quality mitigation measures, please refer to Master Response 13. With regard to the comment's Attachments 3 and 4, providing updated calculations regarding helicopter use, please refer to Response to Comment J-77.

At this time, given uncertainty with respect to final construction schedules and equipment that may undergo additional changes, as well as inadequate detail to fully verify all the assumptions in particular for helicopter activity and flight times, there will be no changes to the EIR construction emissions estimates, nor any change in the significance determination. With consideration of the Proposed Project Applicants' provided estimates and the estimates shown in the EIR, a reasonable range of emissions has been presented and a reasonable upper bound was used to estimate emissions and establish the significance determination. Revisions to Mitigation Measure AQ-1 made as part of the Recirculated DEIR (which have been accepted in this FEIR) will allow for the Applicants to potentially reduce or eliminate offset mitigation if they are able to demonstrate by tracking actual emissions from construction that the emissions are below the Quarterly Tier 2 ROG and NO_x threshold, provided in Table 4.3-3 on page 4.3-15 in Volume 1 of the FEIR.

Response to Comment J-70

Please refer to Response to Comment J-69.

Response to Comment J-71

Please refer to Response to Comment J-69.

Response to Comment J-72

Please refer to Response to Comment J-69.

Response to Comment J-73

Please refer to Response to Comment J-69.

Response to Comment J-74

Please refer to Response to Comment J-69.

Response to Comment J-75

This comment suggests that the noise threshold selected is not appropriate. Although the Proposed Project is not under the jurisdiction of the Federal Transit Administration (FTA), the FTA is the only agency that provides specific guidance for construction noise. The FTA

recommends developing construction noise criteria on a project-specific basis that utilizes local noise ordinances if possible. However, local noise ordinances usually relate to nuisance and hours of allowed activity. Sometimes, local noise ordinances specify limits in terms of maximum levels, but these are generally not practical for assessing the noise impacts of a construction project. Project construction noise criteria should take into account the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land uses. The FTA standards are based on extensive studies by the FTA and other governmental agencies on the human effects and reaction to noise. Given the lack of other more suitable standards, the CPUC adopts this standard.

Response to Comment J-76

This comment suggests that the FTA's 90 dBA noise standard is normalized over a one-hour time period. The comment is correct that the 90 dBA standard is normalized over 1-hour and is not an instantaneous measurement.

Response to Comment J-77

This comment suggests that helicopter trip assumptions are inaccurate and overestimated helicopter noise levels. The commenter provides Attachment 4, which the commenter states clarifies assumptions about helicopter use and recalculates noise levels. The comment also suggests edits to Mitigation Measure NOI-2 by reference to Attachment 1 to the comment letter (refer to Comment J-229). The commenter alleges noise impacts from helicopter use will be less than significant with implementation of APMs and mitigation measures.

More detailed information on helicopter travel times was requested from the Applicants by the CPUC and was not received prior to issuance of the DEIR. The values reported in the DEIR are based on maximum noise values. While there would be some decrease for time weighted noise levels, given the uncertainty of helicopter use and absence of justification for the selection of times provided by the commenter, no changes to the noise values have been made as these are conservative and allow for uncertainty in use of the helicopter activities.

In response to Comment J-77, the text of Mitigation Measure NOI-2 in Section 4.13, "Noise and Vibration," pages 4.13-19 and 4.13-20, in Volume 1 of the FEIR, has been updated to adjust the amount of advance notice that must be provided to residences and places of worship within proximity to helicopter activities and to clarify the types of helicopters covered by hovering restrictions. The revised text is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure NOI-2 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Mitigation Measure NOI-2: Minimize Noise Impacts from Helicopters.

HWT and PG&E shall implement the following procedures for helicopter activities:

- Public Notice. Residences and places of worship (e.g., The Cove) within 1450 feet from any location where helicopter activities may occur, including flight paths if applicable, shall be provided written notice at least ~~1430~~ 1430 days prior to beginning helicopter activities to inform them of the schedule for helicopter use and potential noise disruptions. Methods for receptors to reduce noise in structures shall be included in the notice (i.e., closing doors and windows facing the alignment). The

notice shall describe procedures for submitting any noise complaints during construction and provide a phone number for submitting such complaints, as required by MM NOI-1.

- **Flight Paths.** Helicopter flight paths shall be planned along routes that would result in the least noise exposure possible to receptors. If helicopter noise complaints are received, work crews will attempt to adjust the flight paths to reduce noise exposure to the complainant, without substantially increasing noise exposure to other receptors.
- **Helicopter Hovering.** ~~Light/medium lift helicopters~~ Helicopters shall not operate closer than 200 feet from any receptors unless actively working at pole locations along the alignment. Helicopters may operate closer than these distances if all affected receptors agree in writing to a shorter distance. Prior to reducing the minimum distance from receptors, PG&E shall provide the CPUC with the names, contact information, and written agreements for all affected persons within the applicable distances. The written agreements shall clearly identify the anticipated helicopter noise levels, daily schedule, and duration of helicopter activities in the vicinity.
- **Helicopter Landing Zones.** Helicopter landing zones within staging areas shall be positioned as far as possible from receptors. Helicopter landing zones shall not be positioned closer than 1,450 feet from any receptor. Helicopters may land closer than these distances if all affected receptors agree in writing to allow a shorter distance.

Response to Comment J-78

This comment suggests changes to helicopter assumptions, noise level calculations, and Mitigation Measure NOI-2. Refer to Response to Comment J-77.

Response to Comment J-79

This comment suggests changes to Mitigation Measure NOI-2. Refer to Response to Comment J-77.

Response to Comment J-80

This comment states that the EIR's mitigation measures should be drafted so that it is clear which Proposed Project Applicant is obligated to comply with each measure and which project component the mitigation measure applies to. This comment is noted. The commenter provides further, more specific comments on this topic in Comments J-81 to J-90; the CPUC provides detailed responses to each of these comments below.

Response to Comment J-81

The comment states that Mitigation Measure BIO-3 only applies to PG&E because HWT is not constructing any of the 230 kV interconnection or the 70 kV power line. In response to Comment J-81, the text of Mitigation Measure BIO-3 in Section 4.4, "Biological Resources," page 4.4-54, in Volume 1 of the FEIR, has been updated to reflect that this mitigation measure applies only to PG&E (references to HWT have been deleted in the mitigation measure). For the revised text, please refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The changes to

Mitigation Measure BIO-3 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-82

The comment asserts that it is unnecessary for PG&E to create an additional project-specific Avian Protection Plan document, and that PG&E will implement the company's Avian Protection standards, which are consistent with the Avian Power Line Interaction Committee's (APLIC) guidelines. The CPUC agrees with this comment. The text of Mitigation Measure BIO-3 in Section 4.4, "Biological Resources," page 4.4-54, in Volume 1 of the FEIR, has been revised as requested by the commenter (refer to proposed revisions in Comment J-83) with some modifications. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure BIO-3 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

In conjunction with these publications, ~~HWT and~~ PG&E shall be responsible for ~~implementing the company's creating an~~ Avian Protection Plan - PG&E's Program to Address Avian Electrocutions, Collisions, and Nesting Birds (April 2018 version; refer to Appendix D in Volume 2 of this FEIR) that incorporates relevant ~~project-specific raptor-safe construction~~ guidelines found in APLIC's and USFWS' 2005 *Avian Protection Plan Guidelines*.

As indicated in the revisions shown above, PG&E's Avian Protection Plan has been incorporated into this FEIR as an appendix (refer to Appendix D in Volume 2 of the FEIR). Should there be any updates to the Avian Protection Plan prior to implementation of the Proposed Project or applicable alternative, PG&E must provide an updated version of the Avian Protection Plan to the CPUC and it must be confirmed by the CPUC that the updated version is no less protective than that included in Appendix D.

Response to Comment J-83

This comment proposes revisions to the text of Mitigation Measure BIO-3, based on the information presented in Comment J-82. As indicated in Response to Comment J-82, the CPUC has accepted these proposed revisions for the FEIR. Please refer to Chapter 4, *Revisions to the DEIR*, and Volumes 1 and 2 of the FEIR.

Response to Comment J-84

The comment requests that Mitigation Measure BIO-3 be revised to clarify that it does not apply to the 230 kV interconnection. The comment explains that APLIC does not have phase to phase recommendations for high voltage lines in the 230 kV range; thus, there would be no way to design the 230 kV interconnection to APLIC standards. While the phase to phase recommendations from the APLIC may not apply to the 230 kV range, Mitigation Measure BIO-3 also requires that the facilities be constructed to avoid collision hazards. As acknowledged by PG&E in Comment J-182, the 2012 APLIC document (*Reducing Avian Collisions with Power Lines: State of the Art in 2012*) would apply to the 230 kV interconnection. Additionally, Mitigation Measure BIO-3 includes requirements for restricting construction work to outside the nesting season and protocols for establishing no-disturbance buffers around any active nests; each of which could potentially apply to the 230 kV interconnection.

Thus, CPUC disagrees with the assertion that Mitigation Measure BIO-3 needs to be revised such that it does not apply to the 230 kV interconnection. However, the text of Mitigation Measure BIO-3 has been revised to clarify that transmission and power lines would need to meet applicable APLIC recommendations. The revised text is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure BIO-3 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

~~HWT~~, PG&E, and/or their contractor(s) shall construct all aboveground ~~power~~ transmission and power lines to meet applicable the APLIC's recommended recommendations, as published in ~~publications~~: *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006*, and *Reducing Avian Collisions with Power Lines: State of the Art in 2012* (APLIC 2006, 2012).

Response to Comment J-85

The comment asserts that it is not appropriate or feasible for PG&E to seek approvals from CDFW and/or USFWS for buffer reductions pertaining to individual nests, as the commenter claims that there is no specific mechanism for either agency to grant approvals for particular nest buffer distance reductions. The commenter provides proposed revisions to the text of Mitigation Measure BIO-3 in Comment J-86 below. The CPUC concurs with the proposed revisions and has revised the text in Section 4.4, "Biological Resources," page 4.4-54, in Volume 1 of the FEIR, as requested by the commenter. Additionally, the CPUC has added text to state that the biologist will contact regulatory agencies if required to do so in any of the permits issued for the project. For the revised text, please refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-3 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-86

This comment proposes revisions to the text of Mitigation Measure BIO-3, based on the information presented in Comment J-85. As indicated in Response to Comment J-85 above, the CPUC has accepted these proposed revisions for the FEIR. Please refer to Chapter 4, *Revisions to the DEIR*, and Volumes 1 and 2 of the FEIR.

Response to Comment J-87

This comment states that Mitigation Measure TR-1 is unworkable as written because it would require the Applicants to develop a single traffic control plan; however, the various encroachment permits (state, county, and city) that are necessary will each require individualized traffic control plans. Refer to Response to Comment J-304. As described in this response, as a State agency, the CPUC has authority to require mitigation for impacts under CEQA in addition to requirements that may be included in local permits. Therefore, the commenter's proposed limitation of this mitigation measure to the requirements in local encroachment permits has not been incorporated into the FEIR; however, revisions to Mitigation Measure TR-1 have been made to allow for preparation of separate traffic control plans by HWT and PG&E and to incorporate recommended changes regarding notification of police, fire, and other emergency services departments. For the revised text, refer to Response to Comment J-304; Chapter 4, *Revisions to the DEIR*, and Volumes 1 and 2 of the FEIR.

Response to Comment J-88

This comment provides proposed changes to Mitigation Measure TR-1 to allow multiple traffic control plans. Refer to Response to Comment J-87.

Response to Comment J-89

This comment states that the Applicants can provide CPUC copies of the traffic control plan(s) upon request. This comment is noted.

Response to Comment J-90

This comment suggests that Mitigation Measure NOI-1 should not apply to ground-level construction activities. Refer to Response to Comment H-19.

Response to Comment J-91

This comment concludes the letter and provides contact information. Thank you for your comment.

Response to Comment J-92

This comment states that a land survey would not be required to mark staging and work areas. This is inconsistent with what is indicated in the PEA, which stated that “Construction of the substation will follow a typical sequence beginning with survey marking of staging areas and work areas...” (PEA, page 2-38). Regardless, based on this latest information from the Proposed Project Applicant, the text in the *Executive Summary*, page ES-6, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-92 have been incorporated. The change has also been carried over to the Project Description. (FEIR, Volume 1, p. 2-69.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-93

This comment asserts the No Project Alternative would support the Applicant’s proposed Reliability Objective, as outlined in the PEA. This comment does not raise issues regarding EIR adequacy and no further response is required. This comment is noted and will be shared with the CPUC’s decisionmakers.

Response to Comment J-94

This comment suggests a deletion (i.e., removing the “El Pomar-Estrella Sub Area” sub area description for the Bonel Ranch site) to maintain consistency across multiple alternative descriptions. In response to this comment, the text in the *Executive Summary*, page ES-11, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-94 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-95

This comment suggests inclusion of a statement that clarifies that EMFs and property value considerations fall outside the scope of CEQA. In response to this comment, the text in the *Executive Summary*, page ES-15, in Volume 1 of the FEIR, has been revised and the proposed

revisions included in Comment J-95 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-96

This comment identifies an error in the CEQA Guidelines citation found in the Introduction chapter of the EIR. HWT made the same observation/correction in its comments on the DEIR (refer to Comment H-60). Refer to Response to Comment H-60. As described in this comment response, this correction has been made in the FEIR.

Response to Comment J-97

This comment recommends removal of a footnote to Table 2-4 in the Project Description, arguing that the footnote could cause confusion to the public. This footnote was already removed from the Project Description as part of the Recirculated DEIR. Since the revision was already provided for public review as part of the recirculation, it has been accepted and is not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-98

This comment identifies an error in the Project Description chapter of the DEIR, where the name of the transmission line has changed. This change was already made as part of the Recirculated DEIR. Since the revision was already provided for public review as part of the recirculation, it has been accepted and is not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-99

This comment identifies an error in the Project Description chapter of the DEIR, where the name of the transmission line has changed. This change was already made to the Project Description as part of the Recirculated DEIR. Since the revision was already provided for public review as part of the recirculation, it has been accepted and is not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-100

This comment provides a factual correction to the Project Description chapter of the DEIR, clarifying that HWT may sell and/or grant land easements to PG&E to allow for construction of the 70 kV substation and 230 kV interconnection. This change was already made to the Project Description as part of the Recirculated DEIR. Since the revision was already provided for public review as part of the recirculation, it is not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-101

This comment provides a factual correction of the Proposed Project design, as described in Chapter 2 of the DEIR, clarifying that two additional LSTs or TSPs would be used to complete the interconnection at the Estrella Substation. This change was already made to the Project Description as part of the Recirculated DEIR. Since the revision was already provided for public review as part of the recirculation, it is not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-102

This comment provides a factual correction of the Proposed Project construction methods, as described in Chapter 2 of the DEIR, clarifying that construction fencing would require digging to a depth of 5 feet to install fence footings. This change was already made to the Project Description as part of the Recirculated DEIR. Since the revision was already provided for public review as part of the recirculation, it is not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-103

This comment provides a factual correction of the Proposed Project design, as described in Chapter 2 of the DEIR, clarifying that the control house will be installed on a concrete slab. This change was already made to the Project Description as part of the Recirculated DEIR. Since the revision was already provided for public review as part of the recirculation, it is not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-104

This comment suggests inclusion of details describing the interconnection at the Estrella Substation to ensure consistency with the description in Section 2.4, "Easement Requirements." These changes were already made to the Project Description as part of the Recirculated DEIR. Since the revisions were already provided for public review as part of the recirculation, they are not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-105

This comment provides clarifying corrections to the text describing Proposed Project construction methods, specifically the process for removing old, existing poles and backfilling these areas with native soils, as described in Chapter 2 of the EIR. These changes were reflected in the revised Project Description as part of the Recirculated DEIR. Since the revisions were already provided for public review as part of the recirculation, they are not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-106

This comment provides revisions to the description of operation of the distribution circuits during line outages. This change was already made to the Project Description as part of the Recirculated DEIR. Since the revision was already provided for public review as part of the recirculation, it is not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-107

This comment identifies an error where a content heading is not showing up correctly. The commenter suggests that the heading be relocated to precede the descriptive text in the referenced passage. The heading in question ("Sites") was actually intended to follow the passage referenced by the commenter. This error has been corrected in Chapter 3, *Alternatives*

Description, page 3-114, in Volume of the FEIR. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-108

This comment clarifies that the northern distribution segment would not be installed within the median. In response to this comment, the text in Section 4.1, “Aesthetics,” page 4.1-4, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-108 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-109

This comment clarifies that the northern distribution segment would not be installed within the median. In response to this comment, the text in Section 4.1, “Aesthetics,” page 4.1-8, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-109 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-110

This comment clarifies that the Proposed Project, reasonably foreseeable distribution components, and alternatives are located entirely within non-urbanized areas. In response to this comment, the text in Section 4.1, “Aesthetics,” page 4.1-38, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-110 have been incorporated into the FEIR. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-111

This comment clarifies that the proposed new power line segment would not be inconsistent with zoning regulations. In response to this comment, the text in Section 4.1, “Aesthetics,” page 4.1-42, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-111 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-112

This comment suggests revisions to the description of Mitigation Measure AES-1 in the Aesthetics section of the EIR to indicate that landscaping incorporated in front of the substation to reduce aesthetic impacts would need to comply with the standards provided in PG&E’s Wildfire Safety Inspection Program and CAL FIRE’s defensible space guidelines. In response to this comment, the text in Section 4.1, “Aesthetics,” page 4.1-43, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-112 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-113

This comment suggests revisions to the first bullet of Mitigation Measure AES-1 to indicate that landscaping incorporated between Union Road and the Estrella Substation would need to comply with the standards provided PG&E’s Wildfire Safety Inspection Program and CAL FIRE’s defensible space guidelines. The comment also suggests deleting reference to the County Fire

Department with regard to coordination to ensure that landscaping shrubs do not increase fire risk. In response to this comment, the text in Section 4.1, “Aesthetics,” page 4.1-43, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-113 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure AES-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-114

This comment requests a modification to the second bullet of Mitigation Measure AES-1 in order to conform to current PG&E practices regarding fencing around substation facilities. In response to this comment, the text in Section 4.1, “Aesthetics,” page 4.1-44, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-114 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure AES-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-115

This comment requests a modification to the third bullet of Mitigation Measure AES-1 so as to omit the requirement for LSTs to be ordered with a dulled finish (due to schedule and cost considerations) and to conform to current PG&E practices regarding the finish on steel poles at substation facilities. While the CPUC understands PG&E’s preferences with respect to the LSTs, the reasons provided are not justification for removal of the requirements in Mitigation Measure AES-1. Likewise, the CPUC does not conclude that procuring within-substation structures with a dulled finish is infeasible or unwarranted at this time. The dulled finish on transmission structures required under Mitigation Measure AES-1 would reduce the significant effects identified in the aesthetics analysis. As such, the proposed revisions in Comment J-115 with respect to the LSTs and substation structures have not been incorporated in the FEIR.

The dulled finish requirement in Mitigation Measure AES-1 was not intended to apply to the power line conductors, and thus the following clarification has been made in Section 4.1, “Aesthetics,” page 4.1-44, in Volume 1 of the FEIR.

- For all Proposed Project and alternative components (not including the power line conductors), use...

The revised language is also provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revision to Mitigation Measure AES-1 has also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-116

This comment requests deletion of the fourth bullet of Mitigation Measure AES-1, which the commenter argues conflicts with the revised third bullet. In response to this comment, the text in Section 4.1, “Aesthetics,” page 4.1-44, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-116 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure AES-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-117

This comment duplicates Comment J-115. Please refer to Response to Comment J-115.

Response to Comment J-118

This comment suggests a revision to the analysis of aesthetic effects related to creation of substation light and glare, such that APM AES-2 would not apply to operation and maintenance activities. The commenter's point is acknowledged and the CPUC concurs with the proposed revisions. Thus, the text in Section 4.1, "Aesthetics," page 4.1-45, in Volume 1 of the FEIR, has been revised accordingly. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-119

This comment suggests a revision to clarify the starting point of the segment of Alternative SE-PLR-2 along South River Road. In response to this comment, the text in Section 4.1, "Aesthetics," page 4.1-53, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-119 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-120

This comment notes that Farmland of Local Potential is not defined in the Agriculture and Forestry Resources section, although the category is included in Table 4.2-1. The comment suggests adding a footnote to Table 4.2-1³ to define Farmland of Local Potential. In response to this comment, the text in Section 4.2, "Agriculture and Forestry Resources," page 4.2-4, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-120 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-121

This comment asserts that the calculation of permanent agricultural conversion should be adjusted to account for the removal of existing distribution poles. The 314-square-foot reduction of permanent impact to Farmland of Statewide Importance and Unique Farmland results in a change of 0.007 acre of permanent impact in each category. Because the information in Table 4.2-2 and the text beginning on page 4.2-12 in Volume 1 of the FEIR reflect numbers that have been rounded up and do not go out to three decimal points, no revision to the DEIR text is necessary.

Response to Comment J-122

This comment suggests revising Mitigation Measure AG-1 to modify the process for compensation for loss of agricultural land. These are the same proposed revisions presented in Comment J-58 and submitted by HWT in their comments on the original DEIR (refer to Comment H-16). Please refer to Response to Comment H-16 for the CPUC's detailed response. As

³ Note that Table 4.2-1 was revised as part of the Recirculated DEIR.

indicated in Response to Comment H-16, the CPUC has accepted these proposed revisions, with modifications, for the FEIR.

Response to Comment J-123

This comment suggests revisions to Mitigation Measure AG-2 to clarify the responsibility of HWT versus PG&E, and to allow for retention of construction-related material on impacted agricultural land if the property owner wishes. In response to this comment, the text in Section 4.2, "Agriculture and Forestry Resources," page 4.2-15, in Volume 1 of the FEIR, has been revised and proposed revisions included in Comment J-123 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-124

This comment clarifies that the northern reasonably foreseeable distribution line segment would not be installed within the median, but rather would parallel the existing SR-46 right-of-way. In response to this comment, the text in Section 4.2, "Agriculture and Forestry Resources," page 4.2-17, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-124 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-125

This comment notes that the Bonel Ranch site is currently under a Williamson Act contract. The comment suggests revising the significance determination for Alternative SS-1 under criterion B to significant and unavoidable. This change was previously made to Section 4.2, "Agriculture and Forestry Resources," as part of the Recirculated DEIR. Since the revision was already provided for public review as part of the recirculation, it is not shown in underline/strikeout in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment J-126

This comment corrects a typographical error in the discussion of impacts of Alternative PLR-3 with respect to agricultural resources. In response to this comment, the text in Section 4.2, "Agriculture and Forestry Resources," page 4.2-21, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-126 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-127

This comment notes that the title of Impact AQ-2 does not match significance criterion B, and suggests revising the title to match the significance criterion. In response to this comment, the text in Section 4.3, "Air Quality," page 4.3-16, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-127 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-128

The commenter suggests that the tier associated with the significance threshold for reactive organic gases (ROG) and nitrogen oxides (NOx) be provided in Table 4.3-5⁴. The reference to a significance threshold of 26.3 tons/quarter for ROG and NOx in Table 4.5-3 was a typo that has been corrected in the FEIR (refer to Section 4.3, “Air Quality,” in Volume 1 of this FEIR). The applicable threshold is 6.3 tons/quarter for Tier 2.

Response to Comment J-129

The commenter suggests text edits to Mitigation Measure AQ-1. Refer to Master Response 13. As indicated therein, Mitigation Measure AQ-1 was revised as part of the Recirculated DEIR.

Response to Comment J-130

The commenter suggests edits to part of Mitigation Measure AQ-1 to limit scheduling of construction truck trips during non-peak hours to reduce peak hour emissions when possible.

Refer to Master Response 13. Note that the text of Mitigation Measure AQ-1 was revised as part of the Recirculated DEIR. The portion of Mitigation Measure AQ-1 referenced by the commenter was changed to specify the scheduling of construction truck to trips to reduce peak hour emissions to the extent feasible.

Response to Comment J-131

The commenter suggests that the EIR text be revised to clarify that construction and operation activities for the reasonably foreseeable distribution components would not require the use of helicopters. In response to Comment J-131, the text in Section 4.3, “Air Quality,” page 4.3-29, in Volume 1 of the FEIR, has been revised as suggested in the comment. For the revised text, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-132

The commenter states that PG&E does not have any peaker plants in the San Luis Obispo area and, therefore, suggests deleting the quoted passage of the EIR that discusses the potential for use of battery stored power to reduce the need for criteria pollutant emitting sources of electricity.

The comment is noted that PG&E does not have any peaker plants in the area. It is unknown if other grid sources that may be constructed now and in the foreseeable future may use peaker plants rather than battery stored power; thus, the statement is valid and will not be revised.

Response to Comment J-133

This comment suggests revising the text to state that PG&E is in the process of working with USFWS to receive a permit under the Bald and Golden Eagle Protection Act to address work activities in areas with eagle territories. In response to this comment, the text in Section 4.4,

⁴ Note that Table 4.3-5 was revised as part of the Recirculated DEIR, such that the original Table 4.3-5 became Table 4.3-5a showing unmitigated construction emissions, while Table 4.3-5b was added showing mitigated construction emissions.

“Biological Resources,” page 4.4-1, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-133 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-134

This comment states that the interpretation of “take” with respect to the Bald and Golden Eagle Protection Act is speculative and suggests revising the text to remove the discussion of “take.” In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-2, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-134 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-135

The comment suggests adding specific citation to the California Fish and Game Code (CFG) that is relevant to the protection of nesting raptors. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-9, in Volume 1 of the FEIR, has been revised and the proposed revision included in Comment J-135 has been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-136

The comment suggests removing great blue heron from Table 4.4-1, as it is not a special-status species. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-21, in Volume 1 of the FEIR, has been revised and the proposed revision included in Comment J-136 has been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-137

The comment requests that the Salinas River and Dry Creek be labeled in Figure 4.4-1. Labels for these two rivers have been added in response to this comment. The revised figure is provided in Chapter 4, *Revisions to the DEIR*, and in Section 4.4, “Biological Resources,” page 4.4-31, in Volume 1 of the FEIR.

Response to Comment J-138

The commenter suggests revising the text to include discussion of PG&E’s Multi-Region Habitat Conservation Plan (HCP) that it has executed to provide federal endangered species coverage for its service territory. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-41, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-138 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-139

The commenter states that the Multi-Region HCP, referenced in Comment J-138, would apply to the reasonably foreseeable distribution components and ultimate substation buildout. The DEIR text has been revised in response to this comment. Specifically, the text in Section 4.4, “Biological Resources,” page 4.4-42, in Volume 1 of the FEIR, has been revised, as shown below,

to describe the applicability of the Multi-Region HCP. The revised language is also provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

In regard to significance criterion F above, no NCCPs ~~or HCPs~~ are adopted in the vicinity of the Proposed Project, reasonably foreseeable distribution components, and alternatives; however, PG&E's Multi-Region HCP would apply to the reasonably foreseeable distribution components and the additional equipment within Estrella Substation at ultimate buildout. Therefore, there is no potential for conflicts and no impact would occur. This significance criterion is dismissed from further discussion for the Proposed Project and alternatives since there is no potential for conflicts and no impact would occur; however, it has been evaluated for the reasonably foreseeable distribution components and the additional equipment within Estrella Substation at ultimate buildout. The routes of any future 70 kV power lines and 21 kV distribution lines that could be installed as part of the ultimate Estrella Substation buildout are unknown at this time. As a result, the potential environmental effects associated with the power and distribution lines are not evaluated in this DEIR and will need to be evaluated in the future for potential coverage under PG&E's Multi-Region HCP.

Additionally, in response to Comment J-139, the following text has been added on page 4.4-63 to evaluate the potential for the reasonably foreseeable distribution components and ultimate substation buildout to conflict with the Multi-Region HCP. The additional text is also provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

The reasonably foreseeable distribution components and additional equipment within Estrella Substation at ultimate buildout would be covered under the jurisdiction of PG&E's Multi-Region HCP, which requires protection of federally-listed threatened and endangered species and their habitats. Construction and operation of the reasonably foreseeable distribution components and additional equipment within Estrella Substation at ultimate buildout would not conflict with any of the requirements outlined in the Multi-Region HCP. There would be no impacts under significance criterion F.

Response to Comment J-140

The commenter asserts that it is speculative to state that direct impacts to special-status plants would be a significant impact and proposes revisions to indicate that impacts may or may not have the potential to be a significant impact under certain circumstances. The CPUC disagrees with the proposed change and stands by its original analysis. Therefore, no revisions have been made to the DEIR text in response to this comment.

Response to Comment J-141

This is the same comment that was submitted by HWT in its comments on the original DEIR in Comment H-101 regarding requirements and protocols related to preconstruction surveys for Crotch's bumblebee. For the CPUC's response to this comment, please refer to Response to Comment H-101.

Response to Comment J-142

This is the same comment that was submitted by HWT in its comments on the original DEIR in Comment H-102 regarding the significance of impacts to breeding and nesting birds. For the CPUC's response to this comment, please refer to Response to Comment H-102.

Response to Comment J-143

This comment states that PG&E has an Avian Protection Plan and that it implements standard protective measures for birds during the nesting season; thus, the commenter suggests omitting text indicating that impacts to breeding and nesting birds would be significant without preventative measures. The CPUC has determined that it is appropriate to discuss the potential impacts of the Proposed Project prior to/without implementation of preventative measures, plans and regulations; then, discuss the ways in which such preventative measures, plans and regulations would reduce potential impacts before reaching a significance conclusion. This was the approach taken in the passage referenced by the commenter. The Avian Protection Plan is discussed later in the impact discussion for Impact BIO-1 with respect to Mitigation Measure BIO-3. As such, no changes to the DEIR text have been made in response to this comment.

Response to Comment J-144

This is the same comment that was submitted by HWT in its comments on the original DEIR in Comment H-120 regarding the nesting season dates for golden eagle. For the CPUC's response to this comment, please refer to Response to Comment H-120.

Response to Comment J-145

The comment suggests removing language that states that the Applicants would be required to coordinate with CDFW if a bat roost or bat individuals were found. In response to this comment, the text in Section 4.4, "Biological Resources," page 4.4-48, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-145 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-146

The comment suggests revising the text of Mitigation Measure BIO-1 to state that a CPUC-approved botanist rather than a CDFW-approved botanist will work with HWT/PG&E or their contractor to identify plants. In response to this comment, the text in Section 4.4, "Biological Resources," page 4.4-49, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-146 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-147

The comment suggests revising the text of Mitigation Measure BIO-1 to state that HWT/PG&E shall retain a CPUC-approved biologist, not a USFWS and CDFW-approved biologist, to conduct pre-construction surveys. In response to this comment, the text in Section 4.4, "Biological Resources," page 4.4-49, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-147 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-1

are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-148

The comment suggests omitting text from Mitigation Measure BIO-1 to state that the pre-construction survey report only needs to be submitted to the CPUC (not reviewed and approved by CPUC) prior to the start of construction. The comment also suggests clarifying that pre-construction surveys would be conducted within the work areas. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-49, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-148 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-149

This comment suggests specifying the distance to wetlands and waters of the U.S. within which monitoring by a biological monitor would be required over the duration of activities (not just new ground disturbance). The comment suggests that 50 feet should be the specified distance. CPUC concurs with the proposed revisions. In response to Comment J-149, the text of Mitigation Measure BIO-1 in Section 4.4, “Biological Resources,” page 4.4-50, in Volume 1 of the FEIR, has been revised as suggested by the commenter. For the revised text, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-1 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-150

The comment suggests that a passage within Mitigation Measure BIO-1 includes a typographical error with respect to biological monitoring being “extended.” The use of the term “extended” is not an error and refers to the additional monitoring requirements and specificity being imposed through Mitigation Measure BIO-1. Per Mitigation Measure BIO-1, biological monitoring would be required when each portion of previously undisturbed ground is disturbed, based on special-status species requirements and the professional opinion of the qualified biological monitor. Refer to Response to Comment J-149 for the specifications regarding monitoring near wetlands and waters of the U.S. The DEIR text has not been revised in response to this comment.

Response to Comment J-151

The comment suggests revising the text in Mitigation Measure BIO-1 to state that a CPUC-approved biologist, rather than a USFWS- and CDFW-approved biologist, shall flag boundaries of habitat to be avoided during construction. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-50, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-151 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-152

The comment suggests revising the text in Mitigation Measure BIO-1 to state that a CPUC-approved biologist, rather than a USFWS- and CDFW-approved biologist, shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-50, has been revised and the proposed revisions included in Comment J-152 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-153

This comment raises similar points and proposes the same revisions to Mitigation Measure BIO-1 as Comment H-119, submitted by HWT on the original DEIR, with respect to placement of gravel bags to minimize erosion and sedimentation into wetlands and waters of the U.S. For CPUC’s response to this comment, please refer to Response to Comment H-119.

Response to Comment J-154

The comment suggests revising the text of Mitigation Measure BIO-1 to state that any work that will occur beyond the approved limits shall be reported to the CPUC and not HWT’s and PG&E’s compliance teams. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-51, has been revised and the proposed revisions included in Comment J-154 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-155

This is the same comment that was submitted by HWT in its comments on the original DEIR in Comment H-117, regarding specifying that uncovered and unfenced steep trenches and excavation would be inspected for wildlife twice daily. For the CPUC’s response to this comment, please refer to Response to Comment H-117.

Response to Comment J-156

The comment suggests revising the text of Mitigation Measure BIO-1 (in referencing APM BIO-2) to clarify that the nesting bird season commences on January 15 for golden eagles and February 1 for all other birds. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-51, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-156 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-157

The comment suggests deleting text in Mitigation Measure BIO-1 that states that appropriate federal and state permits must be obtained before the project can proceed if a kit fox is discovered. The comment also suggests revisions to indicate that work in the immediate vicinity of a kit fox discovery must stop and photos must be taken as feasible. In response to this

comment, the text in Section 4.4, “Biological Resources,” pages 4.4-51 to 4.4-52, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-157 have been incorporated with modifications. Additional text has been added to clarify how work can resume. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is also shown below. The revisions to Mitigation Measure BIO-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

- If a kit fox is discovered at any time in the project area, all construction in the immediate vicinity must stop, photos taken as feasible, and the CDFW and USFWS contacted immediately. The appropriate federal and state permits must be obtained before the project can proceed. HWT/PG&E shall consult with USFWS and/or CDFW to determine what actions are necessary, if any, before work can resume. Work in the immediate vicinity of the kit fox discovery shall not resume until written authorization is obtained from USFWS and/or CDFW.

Response to Comment J-158

The comment states, with respect to Mitigation Measure BIO-2, that plant monitoring requirements would depend on the species of plant that is impacted and restored and that such requirements can be included in the salvage and relocation plan referenced in the mitigation measure. The comment argues that the 5-year monitoring requirement should be removed, as the amount of monitoring should be paired with the specific plant restored. The comment also suggests removing references to CDFW for approval of various aspects of the process.

CPUC disagrees that the monitoring requirements and success criteria identified in Mitigation Measure BIO-2 should be removed; however, modifications to the measure language will be made for clarification and in response to other comments received on the DEIR. The CPUC does agree with removing references to CDFW and these suggested deletions have been incorporated. For the revisions to Mitigation Measure BIO-2, refer to Response to Comment D-342. The revisions are also provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-2 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*.

Response to Comment J-159

This comment suggests revisions to the text to indicate that PG&E has an existing companywide Avian Protection Plan (refer to Appendix D), which incorporates raptor-safe construction guidelines found in the APLIC and USFWS documents. The CPUC has reviewed this plan and determined that it meets the standards included in Mitigation Measure BIO-3, and therefore it is acceptable for mitigating the Proposed Project’s effects. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-53, Volume 1 of the FEIR, has been revised as proposed in Comment J-159. The revised text is shown in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-160

This comment suggests revisions to the text in the Biological Resources section of the EIR to indicate that PG&E would implement the company’s Avian Protection Plan pursuant to Mitigation Measure BIO-3. While the CPUC concurs with the notion of PG&E implementing its own, existing Avian Protection Plan, the revisions proposed in Comment J-160 are

ungrammatical and also do not capture any of the other elements of Mitigation Measure BIO-3. Therefore, CPUC has revised the referenced passage in Section 4.4, “Biological Resources,” page 4.4-53, in Volume 1 of the FEIR, in a different manner, as shown below.

To ensure that all potential hazards to special-status birds are minimized to the extent possible, **Mitigation Measure BIO-3** also would be implemented, which would require that PG&E implement its Avian Protection Plan – PG&E’s Program to Address Avian Electrocutions, Collisions, and Nesting Birds (April 2018 version; refer to Appendix D in Volume 2 of this FEIR) and implement other measures (including coordination with USFWS to determine the need for installation of bird diverters in areas near known golden and bald eagle nests) to reduce potential impacts to raptors and other avian life from transmission and power line facilities ~~the Applicants incorporate guidance in *Reducing Avian Collisions with Power Lines: State of the Art in 2012* (APLIC 2012) and develop an Avian Protection Plan.~~

These revisions are included in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR.

Response to Comment J-161

This comment suggests revisions to Mitigation Measure BIO-3 to indicate that PG&E would implement its existing Avian Protection Plan, and also to clarify that this mitigation measure would not apply to HWT. These are the same points that were raised in Comments J-81 to J-83. For the CPUC’s response to these points, please refer to Response to Comments J-81 to J-83. As indicated in those responses, the CPUC has accepted PG&E’s proposed revisions.

Response to Comment J-162

This comment suggests revisions to Mitigation Measure BIO-3 to clarify that a new Avian Protection Plan would not be developed and that the measure would not apply to HWT. The comment also suggests that bird diverters “may not be very helpful to prevent eagle contacts...”; however, no revisions are proposed by the commenter to remove or modify the requirement for PG&E to coordinate with USFWS to determine the need for installation of bird diverters in areas near known golden and bald eagle nests. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-54, in Volume 1 of the FEIR, has been revised and the proposed revisions in Comment J-162 have been incorporated. For the revised text, please refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-3 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-163

The comment suggests revising the text of Mitigation Measure BIO-3 to remove the word “operational.” This is the same point that was raised by HWT in its comments on the original DEIR in Comment H-122. For the CPUC’s response to this proposed revision, please refer to Response to Comment H-122.

The comment also suggests revisions to Mitigation Measure BIO-3 to clarify that the nesting bird season begins January 15 for golden eagle and February 1 for all other birds. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-54, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-163 have been

incorporated. For the revised language, refer to Chapter 4, Revisions to the DEIR, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-3 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-164

The comment states, with respect to Mitigation Measure BIO-3, that it is not appropriate or feasible for PG&E to seek approvals for buffer reductions pertaining to individual nests from CDFW or USFWS as there is no specific mechanism for either agency to grant approvals for particular nest buffer distance reductions. This is the same comment and the same proposed revisions that were provided in Comment J-85 to J-86. Please refer to Response to Comments J-85 to J-86 for a discussion of these comments and revisions.

Response to Comment J-165

The comment suggests revisions to Mitigation Measure BIO-4 to clarify that native species used for revegetation purposes will be compatible with the facility, since woody vegetation would be prohibited along the underground corridor (i.e., for Alternative PLR-3). In response to this comment, the text in Section 4.4, "Biological Resources," page 4.4-57, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-165 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure BIO-4 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-166

The comment suggests revisions to the text of Mitigation Measure BIO-4 to allow revegetated or restored areas to achieve a success criteria of 75 percent survival of woody plantings after 3 years. The suggested revisions differ slightly from the revisions proposed in Comment J-282. Please refer to Response to Comment J-282.

Response to Comment J-167

This comment states that APMs do not apply to operation and maintenance activities; therefore, the comment suggests revisions to the text to indicate that PG&E would implement standard BMPs during operation and maintenance activities. In response to this comment, the text in Section 4.4, "Biological Resources," page 4.4-58, Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-167 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-168

The comment suggests revisions to indicate that impacts to special-status plants from construction of the reasonably foreseeable distribution components would have the potential to be significant, rather than would definitely be significant. The CPUC disagrees with the proposed change and stands by its original analysis. The commenter has not provided any explanation or justification for the change. Therefore, no revisions have been made to the DEIR text.

Response to Comment J-169

The comment suggests revisions to clarify that the northern reasonably foreseeable distribution line segment would parallel the existing SR 46 right-of-way instead of being installed within the

median of SR 46. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-62, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-169 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-170

The comment suggests that indirect effects to water quality and references to applicable APMs should be discussed under criterion B for Alternative PLR-1A similar to the discussion under criterion C. In response to this comment, text has been added to Section 4.4, “Biological Resources,” page 4.4-66, in Volume 1 of the FEIR, to discuss the potential indirect effects to riparian habitat associated with Alternative PLR-1A under significance criterion B. The revised text is shown in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is also reproduced below.

The Alternative PLR-1A route would cross several major surface water bodies (i.e., Dry Creek, Huer Huero Creek), as well as several unnamed drainages. In accordance with APM HYDRO-1, however, permanent structures, staging and work areas, and access roads for Alternative PLR-1A would be sited/routed through uplands and outside of existing drainage features to the extent feasible. Prior to construction, sensitive aquatic features slated for avoidance would be identified in the field and clearly marked using flagging tape, fencing, and/or high visibility signage. As a result, riparian areas would be avoided and no direct impacts to riparian areas would occur as a result of Alternative PLR-1A construction. Additionally, implementation of the SWPPP (required per the Construction General Permit) and APM HAZ-1 would minimize potential for erosion, sedimentation, and hazardous materials releases during construction of Alternative PLR-1A, such as to avoid or reduce potential indirect impacts to riparian habitat.

Response to Comment J-171

The comment suggests that indirect effects to water quality and references to applicable APMs should be discussed under criterion B for Alternative PLR-1C similar to the discussion under criterion C. In response to this comment, text has been added to Section 4.4, “Biological Resources,” page 4.4-68, in Volume 1 of the FEIR, to discuss the potential indirect effects to riparian habitat associated with Alternative PLR-1C under significance criterion B. The revised text is shown in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is also reproduced below.

The Alternative PLR-1C route would parallel Estrella River for a portion of its length and would cross Huer Huero Creek, as well as several unnamed drainages. In accordance with APM HYDRO-1, however, permanent structures, staging and work areas, and access roads for Alternative PLR-1C would be sited/routed through uplands and outside of existing drainage features to the extent feasible. Prior to construction, sensitive aquatic features slated for avoidance would be identified in the field and clearly marked using flagging tape, fencing, and/or high visibility signage. As a result, riparian areas would be avoided and no direct impacts to riparian areas would occur as a result of Alternative PLR-1C construction. Additionally, implementation of the SWPPP (required per the Construction General Permit) and APM HAZ-1 would minimize potential for erosion, sedimentation, and hazardous materials releases during construction of

Alternative PLR-1C, such as to avoid or reduce potential indirect impacts to riparian habitat.

Response to Comment J-172

This comment asserts that the potential for wildlife entrapment would increase under Alternative PLR-3, and that this should be addressed in the discussion of this alternative. The CPUC recognizes this as a valid point. In response to this comment, a statement has been added to the discussion of Alternative PLR-3 in Section 4.4, “Biological Resources,” page 4.4-70, in Volume 1 of the FEIR, to describe the increased potential for wildlife entrapment under the alternative even with implementation of preventative measures. The revised text is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is also shown below.

Of particular importance for Alternative PLR-3, which would involve substantial trenching and excavation for installation of the underground line, APM BIO-4 and Mitigation Measure BIO-1 would require that trenches and excavations are fitted with escape ramps or covered at the end of the day to avoid entrapment of special-status species. Even with implementation of these measures, the potential for wildlife entrapment would be elevated under this alternative compared to the Proposed Project and other alternatives.

Response to Comment J-173

The comment asserts that the APLIC does not have guidelines for high voltage lines in the 230 kV range and, therefore, the 230 kV interconnection should not be considered in the discussion of significant impacts for Alternative SS-1. The comment suggests removing the discussion regarding the operation and maintenance activity impacts of the 230 kV interconnection on special-status birds. The CPUC does not agree with these proposed revisions, since the 2012 APLIC collision manual would still apply to the 230 kV interconnection. However, the text in Section 4.4, “Biological Resources,” page 4.4-64, in Volume 1 of the FEIR, has been revised to clarify the nature of the potential impacts. The revised language is included in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is reproduced below.

While the operation and maintenance activities at the substation would not be anticipated to impact special-status species, the 230 kV interconnection would have potential to impact special-status birds (e.g., via ~~electrocution or~~ collision) if not designed properly, which would be a significant impact. To avoid or minimize these effects, **Mitigation Measure BIO-3** would be implemented, which would require that the 230 kV interconnection follow APLIC guidelines for avian protection regarding collision, and also implement PG&E’s Avian Protection Plan.

Response to Comment J-174

The comment suggests revising the text to clarify that not all nesting birds are considered special-status species. The CPUC agrees with the commenter that nesting birds are not commonly referred to as special-status species, but does not agree with the suggested edit to remove nesting birds from the discussion entirely. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-67, in Volume 1 of the FEIR, has been revised to clarify the passage with respect to nesting birds. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is also reproduced below.

One important difference is that in starting at the Bonel Ranch Substation Site (Alternative SS-1), Alternative PLR-1C would parallel the Estrella River at the outset, where there would be increased potential for special-status species to be present, including as well as nesting birds, which may use the Estrella River corridor.

Response to Comment J-175

The comment suggests revising the text to clarify the number of oaks that will be permanently removed for Alternative PLR-3 and to indicate that off-site mitigation of the trees will be implemented instead of on-site replacement. The CPUC generally concurs with this comment, although the proposed revisions are unclear in that they imply that the 47 trees requiring removal are in addition to the 0.52 acre of permanent impact already disclosed in the EIR. Therefore, CPUC has accepted the proposed revisions with some modifications for clarity in Section 4.4, "Biological Resources," pages 4.4-70 to 4.4-71, in Volume 1 of the FEIR. The revised text is provided Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

Based on current alternative design and vegetation mapping, Alternative PLR-3 would permanently impact 0.52 acre and temporarily impact 3.44 to 3.51 acres of blue oak woodland habitat, which is a sensitive natural community and also provides foraging habitat for special-status raptors. Up to 47 oak trees would be required to be removed permanently. These impacts would be considered significant. To mitigate the impacts to blue oak woodland, **Mitigation Measure BIO-4** would be implemented, which would require development and implementation of a blue oak woodland habitat restoration plan. This would include off-site mitigation ~~replacement~~ of any removed trees and would reduce impacts on blue oak woodland from Alternative PLR-3 to a level that is less than significant with mitigation.

Response to Comment J-176

The comment suggests that indirect effects to water quality and references to applicable APMs should be discussed under criterion B for Alternative PLR-3 similar to the discussion under criterion C. In response to this comment, text has been added to Section 4.4, "Biological Resources," page 4.4-70, in Volume 1 of the FEIR, to discuss the potential indirect effects to riparian habitat associated with Alternative PLR-3 under significance criterion B. The revised text is shown in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is also reproduced below.

As noted above, the Alternative PLR-3 route would pass fairly close to Huer Huero Creek, but it would not cross or directly impact this waterbody or associated riparian habitat. Implementation of the SWPPP (required per the Construction General Permit) and APM HAZ-1 would minimize potential for erosion, sedimentation, and hazardous materials releases during construction of Alternative PLR-3, such as to avoid or reduce potential indirect impacts to riparian habitat.

Response to Comment J-177

The comment suggests revising the text to clarify that the transition stations at each end of the underground 70 kV line (under Alternative PLR-3) would include electrified components that could still pose an electrocution hazard to special-status birds; therefore, it is incorrect to say that undergrounding the power line would completely avoid impacts to birds. CPUC concurs

with the proposed revisions. In response to this comment, the text in Section 4.4, “Biological Resources,” page 4.4-71, has been revised and the proposed revisions included in Comment J-177 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-178

The comment suggests that indirect effects to water quality and references to applicable APMs should be discussed under criterion B for Alternative SE-1A similar to the discussion under criterion C. In response to this comment, text has been added to Section 4.4, “Biological Resources,” pages 4.4-72 to 4.4-73, in Volume 1 of the FEIR, to discuss the potential indirect effects to riparian habitat associated with Alternative SE-1A under significance criterion B. The revised text is shown in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is also reproduced below.

The substation under Alternative SE-1A would not directly impact riparian habitat or the drainage features to the south of the site. Implementation of the SWPPP (required per the Construction General Permit) and APM HAZ-1 would minimize potential for erosion, sedimentation, and hazardous materials releases during construction of Alternative SE-1A, such as to avoid or reduce potential indirect impacts to riparian habitat.

Response to Comment J-179

The comment suggests that indirect effects to water quality and references to applicable APMs should be discussed under criterion B for Alternative SE-PLR-2 similar to the discussion under criterion C. In response to this comment, text has been added to Section 4.4, “Biological Resources,” pages 4.4-74 to 4.4-75, in Volume 1 of the FEIR, to discuss the potential indirect effects to riparian habitat associated with Alternative SE-PLR-2 under significance criterion B. The revised text is shown in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is also reproduced below.

As discussed above, the Alternative SE-PLR-2 route would parallel and cross Spanish Camp Creek at South River Road. In accordance with APM HYDRO-1, permanent structures, staging and work areas, and access roads for Alternative SE-PLR-2 would be sited/routed through uplands and outside of existing drainage features to the extent feasible. Prior to construction, sensitive aquatic features slated for avoidance would be identified in the field and clearly marked using flagging tape, fencing, and/or high visibility signage. As a result, riparian areas would be avoided and no direct impacts to riparian areas would occur as a result of Alternative SE-PLR-2 construction. Additionally, implementation of the SWPPP (required per the Construction General Permit) and APM HAZ-1 would minimize potential for erosion, sedimentation, and hazardous materials releases during construction of Alternative SE-PLR-2, such as to avoid or reduce potential indirect impacts to riparian habitat.

Response to Comment J-180

The comment suggests revising the text to clarify that the above-ground electrified components of the undergrounded power line (i.e., transition stations) for Alternative PLR-3 would only pose a significant electrocution hazard to birds if not designed to raptor-safe standards. The CPUC disagrees with these proposed revisions. The approach taken in the EIR is to first evaluate the

potential effects of the Proposed Project or alternative components without mitigating features or programs; then, to impose mitigation as necessary to reduce the impact. The description of the transition stations provided by the Applicants, as included in Chapter 3, *Alternatives Description*, did not indicate that the facilities would be constructed to raptor-safe standards. Thus, Mitigation Measure BIO-3 is warranted to reduce potential impacts to birds from electrocution. Therefore, no revisions have been made to the DEIR text in response to this comment.

Response to Comment J-181

The comment asserts that it does not seem clear, based on an isolated sentence within the analysis of Alternative PLR-3, that this alternative would involve a greater amount of ground disturbance and, thus, as asserted by the commenter, the alternative would have a higher potential to impact special-status wildlife during construction. The CPUC disagrees with this comment. The EIR clearly states: "In general, while construction of Alternative PLR-3 would include more excavation/ground disturbance (and associated potential impacts to biological resources) compared to the same segment of the Proposed Project's overhead 70 kV power line, the underground line once constructed would pose less of a hazard to special-status birds, as discussed further below." (FEIR, Volume 1, pp. 4.4-69 to 4.4-70.)

Response to Comment J-182

The comment asserts that APLIC does not have a recommendation for the 230 kV range with regard to phase spacing to reduce electrocution hazards; thus, only the 2012 APLIC collision manual would apply to the 230 kV interconnection line under Alternative SE-1A. This comment makes a similar point to that made in Comment J-84 earlier in this comment letter. As indicated in Response to Comment J-84, the CPUC has revised Mitigation Measure BIO-3 to indicate that the referenced APLIC documents would not apply to Proposed Project or alternative components with a voltage rating not addressed by the documents. Additionally, the text in Section 4.4, "Biological Resources," page 4.4-72, in Volume 1 of the FEIR, has been revised to clarify the nature of the potential impacts from the 230 kV interconnection for Alternative SE-1A. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is reproduced below.

While the operation and maintenance activities at the substation would not be anticipated to impact special-status species, the 230 kV interconnection would have potential to impact special-status birds (e.g., via ~~electrocution or~~ collision) if not designed properly, which would be a significant impact. To avoid or minimize these effects, **Mitigation Measure BIO-3** would be implemented, which would require that the 230 kV interconnection follow APLIC guidelines for avian protection with respect to collision hazards, and implement PG&E's Avian Protection Plan. Implementation of this mitigation measure would reduce effects on special-status species during operation to a level that is less than significant.

Response to Comment J-183

This comment requests the removal of a statement regarding Alternative SE-PLR-2 having an elevated risk of golden eagle electrocutions given the presence of several known golden eagle nests within proximity to the route. The commenter argues that the statement is speculative. The CPUC disagrees with the comment and believes the statement is based on logical

assumptions and facts. Due to the presence of several known eagle nests near the Alternative SE-PLR-2 alignment, the risk of electrocutions of golden eagles would be higher under this alternative due to a higher presence of juvenile eagles. Young birds may be more susceptible to electrocution because they are inexperienced and less agile at taking off and landing on poles (APLIC 2018). The information regarding the increased susceptibility of young birds to electrocution has been added to Section 4.4, “Biological Resources,” in Volume 1 of the FEIR, for clarification of the elevated risks.

Response to Comment J-184

This comment states that mitigation for the removal of oak trees at front-of-the-meter (FTM) Sites 6, 3 and 7 should be the same as other locations. As explained in the DEIR, FTM BESS sites were selected for illustrative purposes only, because BESS installations have not been designed and technologies have not been selected. Therefore, project-level determinations cannot be made and, as a result, it is not appropriate to recommend mitigation at this time.

Response to Comment J-185

This comment requests adding text to subsection 4.5.1, “Introduction,” in the Cultural Resources section of the EIR. The requested additional text would clarify the focus of the section and direct readers to Section 4.18, “Tribal Cultural Resources.” In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-1, in Volume 1 of the FEIR, has been revised and a portion of the proposed revisions included in Comment J-185 has been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-186

This comment requests modification of text regarding unique archaeological resources. The CPUC has changed the heading and introductory language as requested; however, the CPUC does not consider the additional requested modification particularly accurate, therefore, the text in Section 4.5, “Cultural Resources,” page 4.5-2, in Volume 1 of the FEIR, has been revised and a portion of the requested changes in Comment J-186 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-187

This comment requests the addition of text to the summary of California Health and Safety Code Section 7050.5. The requested additional text would provide additional information regarding determination and notification of the most likely descendant in the event of a discovery of human remains, and subsequent coordination with the most likely descendant with respect to appropriate treatment of the human remains. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-2, in Volume 1 of the FEIR, has been largely revised, with some exceptions, and proposed revisions included in Comment J-187 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-188

This comment requests the addition of text to the discussion of the California Register of Historical Resources, and to move this discussion to precede the discussion about Unique Archaeological Resources. In response to this comment, the text in Section 4.5, “Cultural

Resources,” pages 4.5-1 to 4.5-3, in Volume 1 of the FEIR, has been moved as requested, but the proposed text revisions have been moved to the bottom of the section, rather than in the first paragraph. Corrections have also been made with reference to “PRC Section 21084.1.” The proposed revisions included in Comment J-188 have generally been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-189

This comment corrects an error found related to the height of the cedar utility pole at Site 36052-S-001. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-9, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-189 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-190

This comment requests the addition of text to Impact CR-1 to emphasize the use of the Proposed Project area by Native American tribes. In response to this comment, the text in Section 4.5, “Cultural Resources,” pages 4.5-14 to 4.5-15, has been revised and the proposed revisions included in Comment J-190 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-191

This comments states that the geoarchaeological analysis impact under CR-1 is not consistent with the findings of the buried site sensitivity analysis. The comment maintains that “Holocene-aged sediments closer to the surface are more likely to contain archeological resources. Therefore, the likelihood of the pole footing excavation or more minor grading to encounter resources is similar.” They are specifically citing text that says “installation of concrete pier foundations for poles, which will reach depths of up to 20 feet, would have the greatest potential to encounter/impact buried resources.” The commenter disagrees with this statement and would like it deleted, along with the sentence that follows the one referenced above.

The CPUC disagrees with this comment and suggested revision, as Holocene soils in the areas identified as sensitive can be at least 5 feet deep, and possibly more. Therefore, the pole excavations to 20 feet have the potential to pass through buried cultural deposits, and grading for structure locations, pull and tension sites, and access roads could also reveal buried archaeological materials. The FEIR has not been revised according to the request in this comment; however, the text in Section 4.5, “Cultural Resources,” page 4.5-8, in Volume 1 of the FEIR, has been modified to provide information about the depths of Holocene deposits. This revised text is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

As these Holocene soils are up to 5 feet deep (NRCS 2021), there is potential for preservation of buried cultural deposits within the channel banks and adjacent floodplains of these water courses (NEET West and PG&E 2017a).

Additionally, the text cited by the comment has been modified in Section 4.5, “Cultural Resources,” page 4.5-15, in Volume 1 of the FEIR, to emphasize Holocene soils. The revised

language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

In particular, installation of concrete pier foundations for poles, which will reach depths of up to 20 feet, would have the greatest potential to pass through Holocene deposit and encounter/impact buried resources. Minor grading for structure locations, pull and tension sites, and access roads could also reveal buried archaeological materials.

Response to Comment J-192

This comment recommends deleting language in Mitigation Measure CR-1 related to actions to be taken by the CPUC and not the Applicants. In response to this comment, the text has been revised in Section 4.5, “Cultural Resources,” pages 4.5-17 to 4.5-19, in Volume 1 of the FEIR, and revisions pertaining to Comment J-192 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure CR-1 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-193

This comment recommends removing portions of Mitigation Measure CR-1 that are redundant with APM CUL-2. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-17, in Volume 1 of the FEIR, has been revised in response to this comment and proposed revisions included in Comment J-193 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure CR-1 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-194

This comment provides revisions to Mitigation Measure CR-1 to clarify PG&E’s role with regard to coordinating tribal monitors. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-17, in Volume 1 of the FEIR, has been revised and proposed revisions included in Comment J-194 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure CR-1 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-195

This comment requested insertion of text to Mitigation Measure CR-1 to specify protocols for notifying the CPUC and PG&E, should unanticipated discoveries be made during construction. The requested edits pertain to PG&E’s internal coordination, which is not necessary information for this mitigation measure; therefore, these revision requests were not incorporated.

Response to Comment J-196

This comment requests the insertion of additional text to Mitigation Measure CR-1 to specify procedures for the assessment of significance and treatment of discovered cultural resources, including a response time in which the CPUC must respond. The CPUC may not always be able to provide a notice to proceed with work in such short notice. In response to this comment, the

text in Section 4.5, “Cultural Resources,” page 4.5-18, in Volume 1 of the FEIR, has been revised, and some of the proposed revisions included in Comment J-196 have been incorporated with modifications. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is also shown below. The revisions to Mitigation Measure CR-1 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.

If the assessment of significance can be made by the cultural resources principal investigator based on a small sample of discovered material, then the CPUC will review and approve the findings. In the absence of CPUC approval due to a short opportunity for CPUC review due to construction schedules, the applicants shall assume the discovery is a historical resource for the purpose of avoidance, development of an evaluation study, or development of a treatment plan (as described below).

Response to Comment J-197

This comment suggests revision to the text of Mitigation Measure CR-1 to clarify procedures surrounding treatment methods documented in a technical report for discovered cultural resources including a response time in which the CPUC must respond. The CPUC may not always be able to provide a notice to proceed with work in such short notice. In response to this comment, the text of Section 4.5, “Cultural Resources,” pages 4.5-18 to 4.5-19, in Volume 1 of the FEIR, has been revised, though not exactly as suggested by the commenter and proposed revisions included in Comment J-197 have been incorporated. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure CR-1 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System. Work in the area may commence, ~~at the direction of the CPUC~~ following concurrence from the CPUC that the fieldwork performed was sufficient, upon completion of treatment and under the direction of the qualified archaeologist. Should the resource also be identified as a TCR, then measures outlined in Section 4.18 will also apply if resource-specific measures identified during the resource-specific consultation do not supersede them.

Response to Comment J-198

For the reason discussed in Response to Comment J-191, the commenter requests deletion of the phrase “especially where there would be deep excavations for pole and tower foundations,” pertaining to the unanticipated discovery of human remains. The CPUC disagrees with this request. As noted in the response to Comment J-191, Holocene soils can be 5 feet deep or more; thus, excavation through these soils for the installation of pole and tower foundations has the potential to discover human remains. The DEIR text has not been revised according to the request in this comment; however, some text in Section 4.5, “Cultural Resources,” page 4.5-19, in Volume 1 of the FEIR, has been modified to clarify the potential for discovery of human

remains via excavations in Holocene soils. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

However, there would be potential to encounter buried human remains in any area the Proposed Project plans disturbance, especially where there would be ~~deep~~ excavations through Holocene deposits for pole and tower foundations.

Response to Comment J-199

This comment requests the insertion of additional text to clarify the options of the most likely descendant, should human remains be discovered during construction. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-20, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-199 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-200

This comment requests the addition of language to Mitigation Measure CR-2 referencing notification of PG&E, should human remains be discovered during PG&E activities. The proposed edit mainly provides information on PG&E’s internal coordination, which is not necessary information for this mitigation measure; therefore, this revision request was not incorporated.

Response to Comment J-201

This comment requests the addition of language to Mitigation Measure CR-2 to further describe the responsibilities of the most likely descendant per Section 5097.98. In response to this comment, the text in Section 4.5, Cultural Resources, page 4.5-20, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-201 have been incorporated with modifications. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure CR-2 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

The most likely descendant will complete inspection of the site and make recommendations or preferences for treatment within 48 hours of being granted access to the site. As per Section 5097.98 of the PRC, the landowner shall discuss and confer with the most likely descendant(s) to determine appropriate treatment of remains.

Response to Comment J-202

This comment requests the addition of language to Mitigation Measure CR-2 to establish a time limit of 24 hours for recommencing work after treatment of discovered human remains. The CPUC may not always be able to provide a notice to proceed with work in such short notice. Therefore, in response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-20, in Volume 1 of the FEIR, has been revised to allow work to commence once compliance with PRC 5097 and documentation of the resolution and respectful disposition of the Native American human remains is provided to the CPUC. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure CR-2 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Construction will not continue in the protected area until treatment of the remains has been resolved, in compliance with PRC 5097 et seq. and notice is provided by to the CPUC documenting the resolution and respectful disposition of the Native American human remains ~~archaeologist to resume work in the area.~~

Response to Comment J-203

This comment requests the addition of language to Mitigation Measure CR-3 to establish a time limit of 30 days for the CPUC to comment on or concur with the findings of technical reports. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-22, in Volume 1 of the FEIR, has been revised to state that if the CPUC cannot respond within 30 days, they will notify the project proponent of the status of their review. However, a lack of response within 30 days may not be considered concurrence. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure CR-3 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

The archaeological and built environment resources surveys shall be completed prior to construction of the respective components and prior to final design. If the CPUC will not complete their review within 30 days, they will notify the project proponent and provide a status of the review. Lack of response within 30 days may not be considered concurrence.

Response to Comment J-204

This comment requests the addition of language to Mitigation Measure CR-3 to provide more specificity regarding the archaeological pedestrian survey. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-22, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-204 have been incorporated with modifications. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure CR-3 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

The pedestrian survey shall include systematic surface inspection with transects spaced at 15-meter (approximately 50-foot) intervals, or less, where feasible and safe (owing to the extant hardscape, such as paving, and landform). Where such transects are not feasible or safe, survey shall provide the most complete coverage possible either through wider transects (ex. on steep slopes near rivers) or opportunistic survey (ex.: locations where private property fences or buildings/pavement don’t obscure the ground). The technical report shall explain the conditions requiring less intensive survey.

The survey and ~~and~~ shall cover the entire site or alignment and a 100-foot buffer around the site or alignment.

Response to Comment J-205

This comment requests the addition of language to Mitigation Measure CR-3 to establish time limits for the CPUC and tribes to comment on or concur with the findings of treatment plans for human remains and the data recovery plans for eligible archaeological sites. The CPUC cannot agree with the 30-day time limit in either case. The text has been revised to say that the CPUC

will provide the project proponent with an update on the status of the review within 60 days of submittal. However, the lack of response within 60 days may not be considered concurrence. In response to this comment, the text in Section 4.5, "Cultural Resources," page 4.5-23, in Volume 1 of the FEIR, has been revised. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure CR-3 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

The CPUC shall ensure consulting tribes have the opportunity to review and comment on evaluation plans for Native American archaeological sites. Archaeological sites found to contain human remains must be treated in accordance with the provisions of Section 7050.5 of the California Health and Safety Code (see APM CUL-4 and Mitigation Measure CR-2). The CPUC will provide the project proponent with an update on the status of the review within 60 days of submittal. Lack of response within 60 days may not be considered concurrence.

Should any archaeological site be determined eligible for listing in the CRHR, and if Project proponent design engineers determine that any portion of the site that contributes to its eligibility cannot be avoided by construction, a data recovery program shall be necessary and a detailed data recovery plan shall be prepared by a qualified archaeologist per Mitigation Measure CR-1(~~ba~~). The data recovery plan must be submitted and approved by the CPUC prior to implementation of the plan. The CPUC shall ensure that consulting tribes will have the opportunity to review and comment on the data recovery plan for any CRHR-eligible Native American site. The CPUC will provide the project proponent with an update on the status of the review within 60 days of submittal. Lack of response within 60 days may not be considered concurrence.

Response to Comment J-206

This comment states that tribes often ask for reburial rather than curation in regards to the requirements in Mitigation Measure CR-3 and asks if this is feasible for the CPUC. In response to Comment J-206, the text of Mitigation Measure CR-3 in Section 4.5, "Cultural Resources," page 4.5-23, in Volume 1 of the FEIR, has been updated to be consistent with Mitigation TCR-1. Specifically, the following text has been added to Mitigation Measure CR-3:

If the archaeological resource is determined to be a TCR, the CPUC shall work with the relevant tribe(s), consistent with Mitigation Measure TCR-1, to determine the disposition of any TCRs artifacts discovered during construction or artifacts resulting from execution of a treatment plan, such as, but not limited to, reburying in close proximity of the finds without scientific study, conducting scientific study before reburying the materials either near the origin of the find or in another protected place, or curation at a facility that meets the U.S. Secretary of the Interior's criteria for curation (36 CFR 79).

Response to Comment J-207

This comment requests the addition of language to the impact discussion for Alternative SS-1 to emphasize the sensitivity of the Estrella River for archaeological remains. In response to this comment, the text in Section 4.5, "Cultural Resources," page 4.5-24, in Volume 1 of the FEIR, has

been revised and the proposed revisions included in Comment J-207 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-208

This comment notes an error regarding pedestrian survey coverage of Alternative PLR-1A and requests deletion of the sentence in question. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-25, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-208 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-209

This comment requests a word change from “would” to “may” with regard to Alternative PLR-1C causing significant impacts to built environment resources. The CPUC concurs with this proposed change. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-25, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-209 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-210

This comment requests removal of reference to HWT with respect to implementation of APM CUL-4 for Alternative SE-1A. It is unclear to the CPUC why this measure would not apply to HWT, since HWT would be involved in constructing the expanded substation under Alternative SE-1A and there would be potential to encounter human remains. The comment does not provide any explanation. Thus, the requested revision has not been made. However, for clarification, the text has been changed to indicate that APM CUL-4 would require that “HWT and/or PG&E follow protocols that are consistent with those outlined in California Health and Safety Code Section 7050.5...” This revised text is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR (refer to page 4.5-27).

Response to Comment J-211

This comment requested clarification regarding the meaning behind the statement that Native American tribes indicated that the Santa Ysabel Ranch area is sensitive for cultural resources. In response to this comment, the text in Section 4.5, “Cultural Resources,” page 4.5-28, in Volume 1 of the FEIR, has been revised to provide this clarification. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

Coordination with Native American tribes indicated that the Santa Ysabel Ranch area (through which the Alternative SE-PLR-2 alignment would pass) is sensitive for TCRs ~~cultural resources~~, including TCRs that are archaeological in nature.

Response to Comment J-212

This comment corrects the current year of the International Building Code (IBC) from ‘2012’ to ‘2018.’ In response to this comment, the text in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” page 4.7-2, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-212 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-213

This comment requests the CPUC consider adding background text (provided by the commenter) describing CEQA, as it pertains to paleontological resources. Some of this proposed language is acceptable, but other parts are unnecessary and add confusion. As a result, in response to this comment, the text in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” pages 4.7-3 to 4.7-4, in Volume 1 of the FEIR, has been revised and some of the regulatory setting information proposed in Comment J-213 has been included with modifications following the section on Public Resources Code 5097.5. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is also shown below.

California Environmental Quality Act

State guidelines for the implementation of CEQA, as amended (14 CCR Division 6, Chapter 3, 15000 et seq.) define procedures, types of activities, persons, and public agencies required to comply with CEQA. The guidelines include as one of the recommended questions to be answered in the Environmental Checklist (Appendix G, Section VII, Part f) the following: “Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?”

CEQA encourages the protection of all aspects of the environment by requiring state and local agencies to prepare multidisciplinary analyses of the environmental impacts of a proposed project, and to make decisions based on the findings of those analyses. Treatment of paleontological resources under CEQA is generally conducted according to guidance from the SVP or other agencies (BLM, etc.) and typically includes identification, assessment, and development of mitigation measures for potential impacts to significant or unique resources.

Response to Comment J-214

This comment suggests a minor revision to clarify for reviewers that it is common for large formations to be only sensitive for paleontological resources within specific areas, and not sensitive overall. In response to this comment, the text in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” page 4.7-21, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-214 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-215

This comment requests that reference to G.O. 95 be removed because it does not mitigate seismic activity, but rather mitigates for “wind events at elevations below 3,000 feet mean sea level (msl), and for wind and ice events above 3,000 feet msl.” Although this information is accurate, the requirements of G.O. 95 apply to the project and address construction with regards to safety in the event of forceful natural events and is therefore relevant to the discussion in the EIR. Therefore, the CPUC has not removed reference to G.O. 95, but has revised the text to address this information. In response to this comment, the text in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” page 4.7-27, in Volume 1 of the FEIR, has been revised as described above. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

Specifically, the Proposed Project components would be designed in accordance with CPUC G.O. 174, which outlines minimum construction material requirements, calculations for foundations, and utility safety measures designed to withstand damage from ground rupture and seismic shaking. The proposed 70kV power line construction would also be engineered in accordance with CPUC G.O. 95, which addresses various strength and construction requirements for overhead electrical lines to withstand strong forces such as wind and ice events. Although seismic activity is not specified, the requirements of G.O. 95 are relevant to the risk of seismic activity. ~~The proposed 70 kV power line structure also would be engineered to meet loads generated by forces such as seismic activity, as required by CPUC G.O. 95.~~

Response to Comment J-216

This comment includes proposed clarifying language for consideration as part of Mitigation Measure GEO-1. Revised text pertains to conditions for the implementation of recommendations contained in the geotechnical investigation reports prepared for the Proposed Project and addenda or subsequent modifications to the reports to account for updated structural design criteria based on the latest California Building Code requirements. HWT made a similar comment on the DEIR (refer to Comment H-124). In response to this comment, the text of Mitigation Measure GEO-1 in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” page 4.7-30, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-216 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure GEO-1 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-217

This comment includes proposed clarifying language for consideration as part of Mitigation Measure GEO-2. Revised text pertains to the use of additional measures for determining sensitivity for paleontological resources. In response to this comment, the text of Mitigation Measure GEO-2 in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” page 4.7-36, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-217 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure GEO-2 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-218

This comment corrects an error related to the applicability of G.O. 95 and G.O. 174 with respect to Alternative PLR-3. Since Alternative PLR-3 involves underground electric transmission/supply facilities, G.O. 128 is the correct citation. In response to this comment, the text in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” page 4.7-39, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-218 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-219

This comment includes proposed clarifying language to explain the applicability of APM PALEO-3 for alternatives. In response to this comment, the text in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” page 4.7-40, has been revised and the proposed revisions included in Comment J-218 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-220

This comment corrects an error related to the applicability of G.O. 95 and G.O. 174 (both of which would not apply to battery storage structures). In response to this comment, the text in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” page 4.7-43, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-220 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-221

This comment states that the California Accidental Release Prevention Program (CalARP) does not apply to substations. The CPUC agrees that mineral oil does not appear to be included on the list of regulated substances pursuant to CalARP (19 CCR 2770.5); however, this could depend on the specific chemical composition of the oil. The CPUC believes that it is appropriate to include the description of the CalARP, even if these requirements may not apply to the Proposed Project. PG&E and HWT are responsible for complying with all applicable laws and regulations associated with the Proposed Project.

Response to Comment J-222

This comment states that the California Emergency Services Act program does not apply to the Proposed Project. The CPUC believes that it is appropriate to describe the California Emergency Services Act in terms of the existing laws and regulations that are designed to prevent and/or respond to a hazardous materials release, such as release of some materials likely to be used in construction and operation of the Proposed Project. PG&E and HWT are responsible for complying with all applicable laws and regulations for the Proposed Project.

Response to Comment J-223

This comment asserts that PG&E and HWT would develop and implement separate fire prevention and management plans, pursuant to Mitigation Measure HAZ-1, and requests revisions to the text of the mitigation measure to make this clear. The CPUC concurs with the proposed revisions. In response to this comment, the text in Section 4.9, “Hazards and Hazardous Materials,” pages 4.9-31 to 4.9-32, in Volume 1 of the FEIR, has been revised and the revisions included in Comment J-223 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure HAZ-1 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-224

This comment states that at a system level, PG&E’s grid control center manages coordination of transmission line and substation clearances/outages during wildfire events, including

coordination with “CDF” and other wildfire agencies. Therefore, the comment argues that the requirement in Mitigation Measure HAZ-1 pertaining to developing and implementing protocols for de-energizing the substation and/or transmission line components should be removed. The CPUC disagrees with the need to remove the referenced requirement from Mitigation Measure HAZ-1. If the protocols for de-energizing electrical facilities have already been established by PG&E, these can be described in the fire prevention and management plan with a focus on the relevant alternative components. The DEIR text has not been revised in response to this comment.

Response to Comment J-225

This comment states that PG&E does not have access to a water source at the substation site, and therefore the requirement in Mitigation Measure HAZ-1 for inclusion of water storage facilities on-site is not feasible and should be removed. The CPUC disagrees with these proposed revisions. PG&E and HWT have stated that several water sources are potentially available in the region (refer to the PEA); thus, filling a water storage tank on one of the alternative substation sites for firefighting purposes should not pose such a problem as to be infeasible. The DEIR text has not been revised in response to this comment.

Response to Comment J-226

This comment argues that Mitigation Measure HYD/WQ-1 should not apply to the reasonably foreseeable distribution components, since these were not requested for authorization under the PTC for the Proposed Project. This is the same comment that was made in Comment J-46. Refer to Response to Comment J-46. As indicated in this comment response, the CPUC does not agree with removing Mitigation Measure HYD/WQ-1.

Response to Comment J-227

This comment questions why Mitigation Measure NOI-1 should apply to ground-level construction activities. Refer to Response to Comment H-19.

Response to Comment J-228

This comment suggests edits to Mitigation Measure NOI-1 to clarify when nighttime work may occur. In response to this comment, the text of Mitigation Measure NOI-1 in Section 4.13, “Noise and Vibration,” page 4.13-19, in Volume 1 of the FEIR, has been revised and proposed revisions included in Comment J-228 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR. The revisions to Mitigation Measure NOI-1 have been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-229

The comment suggests edits to Mitigation Measure NOI-2. Refer to Responses to Comments J-75, and J-77 through J-79 for a discussion of the commenter’s suggested edits.

Response to Comment J-230

The comment suggests that descriptions of transition stations be updated to include HVAC systems to keep controls and relays cold. Refer to Response to Comment J-65.

Response to Comment J-231

This comment provides a revision to the number of workers needed. In response to this comment, the text in Section 4.14, "Population and Housing," page 4.14-3, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-231 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-232

This comment suggests a correction to the location of the reasonably foreseeable distribution line segment along SR 46. In response to this comment, the text in Section 4.15, "Public Services," page 4.15-12, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-232 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-233

This comment suggests an addition to the analysis of impacts for Alternative PLR-3 to clarify that the extended single lane closures for installation of underground circuits would adversely affect emergency vehicle access and access to Cava Robles RV Park. In response to this comment, the text in Section 4.15, "Public Services," page 4.15-16, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-233 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-234

This comment provides a factual correction that Alternatives PLR-1A and PLR-1C propose improvements in the vicinity of an unsignalized four-way intersection of North River Road (not US 101) with Wellsona Road. In response to Comment J-234, the text in Section 4.17, "Transportation," page 4.17-4, in Volume 1 of the FEIR, has been revised as requested by the commenter. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-235

This comment provides a factual correction that the northern reasonably foreseeable distribution line segment would be installed along one side of the SR 46 right of way. In response to Comment J-235, the text in Section 4.17, "Transportation," page 4.17-4, has been revised as requested by the commenter. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-236

This comment provides a factual correction that the northern reasonably foreseeable distribution line segment would be installed along one side of the SR 46 right of way. In response to this comment, the text in Section 4.17, "Transportation," page 4.17-22, has been revised as requested by the commenter. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-237

This comment requests that the original wording regarding the assessment of Site 36052-S-003 as a TCR be replaced with text provided by the commenter. Some of the proposed text is acceptable, but not all of it and it requires clarification. In response to this comment, the text in Section 4.18, "Tribal Cultural Resources," page 4.18-7, in Volume 1 of the FEIR, has been revised. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is also shown below.

As described in Section 4.5, "Cultural Resources," a pedestrian archaeological survey (NEET West and PG&E 2017a) identified three previously unrecorded resources, one of which was a prehistoric lithic scatter (Site 36052-S-003) on the edge of a bluff near the Salinas River and the Proposed Project's new 70 kV power line segment. While none of the tribes consulted identified it as a TCR, Site 36052-S-003 was not evaluated and is presumed to be eligible for the CRHR for the purposes of this CEQA analysis. As also described on page 4.5-15 of Section 4.5, the Proposed Project was designed by the Applicants to avoid this site. ~~For purposes of this analysis, this site is considered potentially CRHR-eligible, and thus is also considered to be a TCR, although none of the tribes contacted by the Applicants or the CPUC through the AB 52 process commented on this site.~~ The pedestrian archaeological survey also identified a number of isolated prehistoric archaeological items, which are not CRHR-eligible, but attest to the widespread use of the Proposed Project area by ancient peoples. In particular, Dry Creek is known to have been used as a transportation corridor by Native Americans and the areas surrounding the Estrella and Salinas Rivers are considered sensitive for cultural resources.

Response to Comment J-238

This comment requests that a reference to Site 36052-S-003 be removed. In response to this comment, the text in Section 4.18, "Tribal Cultural Resources," page 4.18-7, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-238 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-239

This comment disagrees with text in the DEIR regarding the potential for deep excavations to impact cultural deposits based on the opinion listed in Comment J-191, and requests that specific text be removed. The CPUC disagrees with PG&E's rationale, as discussed in the response to Comment J-191. Nevertheless, text has been added to clarify the potential for impacts. The text has been added in Section 4.18, "Tribal Cultural Resources," page 4.18-7, in Volume 1 of the FEIR. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is also shown below.

However, archaeological deposits may be buried and exposed during Proposed Project construction (in particular, during deep excavations for installation of pole foundations that may pass through Holocene deposit).

Response to Comment J-240

This comment requests that language be added to the description of APM CUL-5, indicating that having a tribal monitor present during initial ground-disturbing activities in culturally sensitive areas would allow for the identification of potential TCRs. In response to this comment, the text in Section 4.18, “Tribal Cultural Resources,” page 4.18-7, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-240, with some additional specificity, have been incorporated. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

APM CUL-5 would require that a tribal monitor is present for initial ground-disturbing activities in culturally sensitive areas, which would allow for the identification of potential TCRs that are archaeological in nature, and therefore reduce potential for impacts to TCRs.

Response to Comment J-241

This comment notes that language used to describe APM CUL-5 conflates TCRs with archeological sites. In response to this comment, the text in Section 4.18, “Tribal Cultural Resources,” page 4.18-7, in Volume 1 of the FEIR, has been revised to clarify this distinction. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

Additionally, APM GEN-1 would be implemented to ensure that construction workers are aware of the types of archaeological materials that could be TCRs and be encountered in situations when the tribal monitor may not be present (e.g., ground-disturbing activities away from sensitive locations) and the proper protocols to follow for discoveries.

Response to Comment J-242

This comment requests clarification regarding the meaning of the statement that Native American tribes identified the Santa Ysabel Ranch area as culturally sensitive. The statement appears within Mitigation Measure TCR-1. In response to this comment, the text in Section 4.18, “Tribal Cultural Resources,” page 4.18-8, in Volume 1 of the FEIR, has been revised to clarify that the tribe had identified the Santa Ysabel Ranch area as culturally sensitive for buried archaeological resources that could be TCRs. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

Monitoring of ground disturbance would also occur in the vicinity of Santa Ysabel Ranch, which was identified as culturally sensitive for buried archaeological resources that could be TCRs by the tribe.

The revisions to Mitigation Measure TCR-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-243

This comment requests clarification, with respect to Mitigation Measure TCR-1, regarding whether the tribes indicated that potential TCRs identified will be archaeological in nature. Justification for assuming discovered potential TCRs within the project area would be

archaeological is provided in the analysis for Impact TCR-1. In response to Comment J-243, the text in Section 4.18, "Tribal Cultural Resources," page 4.18-8, has been revised. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is also shown below.

All archaeological materials that are identified as potential TCRs unearthed by project activities shall be evaluated by the Applicants' qualified cultural resources principal investigator and the tribal monitor or other tribal representative identified by the Xolon-Salinan Tribe. If the ~~TCR resource~~ cannot be avoided, a detailed archaeological treatment plan shall be developed for CPUC review and after CPUC approval, implemented by the Applicants' cultural resources principal investigator, consistent with Mitigation Measure CR-1.

The revisions to Mitigation Measure TCR-1 are also carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment J-244

This comment suggests a word choice correction with respect to PG&E's provision of electricity to the region. In response to this comment, the text in Section 4.19, "Utilities and Service Systems," page 4.19-5, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-244 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-245

This comment suggests the removal of information regarding the amount of solid waste that could generated by FTM BESSs. The CPUC finds that it is unnecessary to remove this language as it provides additional detail; however, the comparison of waste quantities to the reasonably foreseeable distribution components rather than the Estrella Substation is warranted. As such, the text in Section 4.19, "Utilities and Service Systems," page 4.19-16, in Volume 1 of the FEIR, has been revised to indicate that the FTM BESSs would likely generate reduced quantities of solid waste compared to the reasonably foreseeable distribution components. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is reproduced below.

Construction of the FTM BESSs under Alternative BS-2 would likely generate reduced quantities of solid waste compared to the ~~proposed Estrella Substation~~ reasonably foreseeable distribution components.

Response to Comment J-246

This comment states that new access roads may be required for FTM facilities under Alternative BS-2 depending on the sites selected. The CPUC notes and concurs with this observation. The text in Section 4.20, "Wildfire," page 4.20-21, in Volume 1 of the FEIR, has been revised in response to this comment. The revised text is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is reproduced below.

No new ~~roads~~, fire breaks, or related additional infrastructure would likely need to be installed or maintained as a result of Alternative BS-2. Depending on specific sites

selected, it is possible that new access roads may need to be constructed and maintained throughout the operation of the FTM facilities.

Response to Comment J-247

This comment suggests a revision to Table 6-3 to clarify that the aesthetic impacts of some other alternatives would require mitigation to reduce them to a less-than-significant level. In response to this comment, the text within Table 6-3 in Chapter 6, *Other Statutory Considerations and Cumulative Impacts*, page 6-13, in Volume 1 of the FEIR, has been revised and the proposed revisions included in Comment J-247 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment J-248

This comment suggests a revision to Table 6-3 to clarify that noise impacts of Alternative SE-1A would require mitigation to reduce them to a less-than-significant level. The commenter's proposed revisions are imprecise, as they suggest that the impacts of the reasonably foreseeable distribution components would require mitigation to achieve less-than-significant levels, which is not the case. The text within Table 6-3 in Chapter 6, *Other Statutory Considerations and Cumulative Impacts*, page 6-16, in Volume 1 of the FEIR, has been revised in response to this comment to clarify the noise impacts of Alternative SE-1A. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is reproduced below.

~~Other alternatives and~~ The reasonably foreseeable distribution components would generate noise, but this would be less than significant on the project level, while the noise impacts of Alternative SE-1A would be less than significant with mitigation.

Response to Comment J-249

This comment requests that the CPUC consider removal of language in Appendix F that suggests a joint database would be used for the mitigation monitoring and reporting program of the Proposed Project. The commenter clarifies that if an environmental database is used, PG&E and HWT would have separate databases. In response to this comment, the text in Appendix F, *Mitigation Monitoring and Reporting Program*, page F-4, in Volume 2 of the FEIR, has been revised and the proposed revisions included in Comment J-249 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR.

Response to Comment J-250

This is the same comment as Comment J-113. As described in Response to Comment J-113, the proposed revisions to Mitigation Measure AES-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-11.

Response to Comment J-251

This is the same comment as Comment J-114. As described in Response to Comment J-114, the proposed revisions to Mitigation Measure AES-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-11.

Response to Comment J-252

This is the same comment as Comment J-115. As described in Response to Comment J-115, the majority of the proposed revisions to Mitigation Measure AES-1 have not been accepted, but a clarification regarding power line conductors has been made. This revision has been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-11.

Response to Comment J-253

This is the same comment as Comment J-116. As described in Response to Comment J-116, the proposed revisions to Mitigation Measure AES-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-12.

Response to Comment J-254

This is the same comment as Comment J-122, and these revisions were also presented in Comments J-58 and H-16. As described in Response to Comment H-16, the proposed revisions to Mitigation Measure AG-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, pages F-13 to F-14.

Response to Comment J-255

This is the same comment as Comment J-123. As described in Response to Comment J-123, the proposed revisions to Mitigation Measure AG-2 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, pages F-14 to F-15.

Response to Comment J-256

This comment notes language in the MMRP regarding confirming that measures are included in contract documents (identified as a monitoring and reporting action), and argues that such language is problematic because it would insert the CPUC into the contractual language between PG&E and its contractors. The comment suggests a revision to the MMRP language that would allow the Applicants to provide documentation showing that the contractors received a copy of the relevant measure. The CPUC concurs that this monitoring and reporting action and other similar ones are unnecessary. While the CPUC encourages PG&E and HWT to include measures in contract documents, the CPUC will not be responsible for ensuring that this contracting process takes place. The ultimate responsibility of the CPUC (and the Applicants) will be to ensure that the APMs and mitigation measures included in the MMRP are fully implemented.

As such, the referenced monitoring and reporting action from Appendix F, *Mitigation Monitoring and Reporting Program*, within the column entitled “Monitoring and Reporting Action (Responsible Party)” of Table F-1, has been struck from the FEIR, as shown below. Other similar monitoring and reporting actions that had been included for other measures have also been struck. The revised text is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 2 of the FEIR.

~~1. Confirm the measure is incorporated into the project contract documents. (CPUC)~~

Similar edits have been made to remove comparable monitoring and reporting actions for Mitigation Measures AES-1, AG-2, AQ-1, AQ-2, BIO-1, CR-1, GEO-1, HYD/WQ-1, NOI-1, NOI-2, TR-1, and TCR-1. Additionally, similar monitoring and reporting actions have been removed for APMs BIO-4, CUL-2, CUL-3, CUL-4, PALEO-2, PALEO-3, GHG-1, HYDRO-1, NOI-1, NOI-2, and TR-1. All revisions are shown in Volume 2 of the FEIR (Appendix F).

Response to Comment J-257

The commenter suggests edits to Mitigation Measure AQ-1. This comment is the same as Comment J-129. Refer to Response to Comment J-129.

Response to Comment J-258

The commenter suggests edits to Mitigation Measure AQ-1. This comment is the same as Comment J-130. Refer to Response to Comment J-130.

Response to Comment J-259

This comment corrects the title of APM BIO-1 in the MMRP. This is the same comment that was made by HWT in its Comment H-116 on the DEIR. Refer to Response to Comment H-116. As described in this comment response, the identified correction has been made in the FEIR.

Response to Comment J-260

The comment suggests revising the MMRP language in the “Monitoring and Reporting Action (Responsible Party)” column for APM BIO-3, with respect to Monitoring and Reporting Action #2, to ensure that measures are being implemented in accordance with the APM. In response to this comment, the text in Appendix F, *Mitigation Monitoring and Reporting Program*, page F-32, in Volume 2 of the FEIR, has been revised and the proposed revisions in Comment J-260 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR.

Response to Comment J-261

The comment suggests revising the MMRP language under the “Monitoring and Reporting Action (Responsible Party)” column for APM BIO-4 to change the responsibility for implementing Monitoring and Reporting Action #2 from the CPUC to the Project Proponents. In response to this comment, the text in Appendix F, *Mitigation Monitoring and Reporting Program*, page F-32, in Volume 2 of the FEIR, has been revised and the proposed revisions in Comment J-261 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR.

Response to Comment J-262

The comment suggests revising the MMRP language under the “Monitoring and Reporting Action (Responsible Party)” column for APM BIO-4 to change the responsibility for implementing Monitoring and Reporting Action #3 from the CPUC to the Project Proponents. In response to this comment, the text in Appendix F, *Mitigation Monitoring and Reporting Program*, pages F-32 to F-33, in Volume 2 of the FEIR, has been revised and the proposed revisions in Comment J-262 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR.

Response to Comment J-263

This is the same comment as Comment J-146. As described in Response to Comment J-146, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR (refer to page F-37).

Response to Comment J-264

This is the same comment as Comment J-147. As described in Response to Comment J-147, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR (refer to page F-37).

Response to Comment J-265

This is the same comment as Comment J-148. As described in Response to Comment J-148, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR (refer to page F-37).

Response to Comment J-266

This is the same comment as Comment J-149. As described in Response to Comment J-149, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-38.

Response to Comment J-267

This is the same comment as Comment J-151. As described in Response to Comment J-151, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-38.

Response to Comment J-268

This is the same comment as Comment J-152. As described in Response to Comment J-152, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-38.

Response to Comment J-269

This is the same comment as Comment J-153, which is the same comment as Comment H-119. As described in Response to Comment H-119, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR page F-39.

Response to Comment J-270

This is the same comment as Comment J-154. As described in Response to Comment J-154, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been

carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR (refer to page F-40).

Response to Comment J-271

The comment suggests revising the text of Mitigation Measure BIO-1 in the MMRP to allow for use of wood planks or other types of escape ramps if provision of earthen ramps in excavations is not feasible. The CPUC concurs with the proposed revisions. In response to Comment J-271, the text of Mitigation Measure BIO-1 in Appendix F, *Mitigation Monitoring and Reporting Program*, within Table F-1 under the column titled “Applicant Proposed Measure or Mitigation Measure,” in Volume 2 of the FEIR, has been revised and the proposed revisions from Comment J-271 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR. The revisions to Mitigation Measure BIO-1 have also been carried over to Section 4.4, “Biological Resources,” in Volume 1 of the FEIR.

Response to Comment J-272

This is the same comment as Comment J-155, which was the same comment as Comment H-117. As described in Response to Comment H-117, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR (refer to page F-40).

Response to Comment J-273

This is the same comment as Comment J-156. As described in Response to Comment J-156, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-41.

Response to Comment J-274

This is the same comment as Comment J-157. As described in Response to Comment J-157, the proposed revisions to Mitigation Measure BIO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR (refer to page F-42).

Response to Comment J-275

This is the same comment as Comment J-158. As described in Response to Comment J-158, the proposed revisions to Mitigation Measure BIO-2, with additional revisions by CPUC, have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, pages F-43 to F-44.

Response to Comment J-276

The comment suggests revising the MMRP language under the “Monitoring and Reporting Action (Responsible Party)” column for Mitigation Measure BIO-2 to remove Monitoring and Reporting Action #2 regarding confirmation of success criteria related to the salvage and relocation plan. As noted in the Response to Comment J-158, the CPUC does not agree with PG&E’s suggestion to completely remove the success criteria for the salvage and relocation plan included in Mitigation Measure BIO-2. The text of Mitigation Measure BIO-2 has been revised, as described and shown in Response to Comment D-342, but the success criteria have been

retained (albeit with modifications). Therefore, the edit requested in this comment is not justified and has not been made in the FEIR.

Response to Comment J-277

This is the same comment as Comment J-161. As described in Response to Comment J-161, the proposed revisions to Mitigation Measure BIO-3 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-44.

Response to Comment J-278

This is the same comment as Comment J-162. As described in Response to Comment J-162, the proposed revisions to Mitigation Measure BIO-3 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-44.

Response to Comment J-279

This is the same comment as Comment J-163. As described in Response to Comment J-163, the proposed revisions to Mitigation Measure BIO-3 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR (refer to page F-45).

Response to Comment J-280

This is the same comment as Comments J-85 to J-86, and J-164. As described in Response to Comments J-85 to J-86, the proposed revisions to Mitigation Measure BIO-3 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR page F-45.

Response to Comment J-281

This is the same comment as Comment J-165. As described in Response to Comment J-165, the proposed revisions to Mitigation Measure BIO-4 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-46.

Response to Comment J-282

This comment contains some of the same revisions as Comment J-166 as well as an additional edit. The proposed revisions stated under Comment J-282 for Mitigation Measure BIO-4 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, pages F-46 to F-47.

Response to Comment J-283

This is the same comment as Comment J-192. As described in Response to Comment J-192, the proposed revisions to Mitigation Measure CR-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, pages F-50 to F-51.

Response to Comment J-284

This is the same comment as Comment J-193. As described in Response to Comment J-193, the proposed revisions to Mitigation Measure CR-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-51.

Response to Comment J-285

This is the same comment as Comment J-194. As described in Response to Comment J-194, the proposed revisions to Mitigation Measure CR-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, pages F-51 to F-52.

Response to Comment J-286

This is the same comment as Comment J-195. As described in Response to Comment J-195, the proposed revisions to Mitigation Measure CR-1 have not been accepted.

Response to Comment J-287

This is the same comment as Comment J-196. As described in Response to Comment J-196, some of the proposed revisions to Mitigation Measure CR-1 have been accepted with modifications. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-54.

Response to Comment J-288

This is the same comment as Comment J-197. As described in Response to Comment J-197, some of the proposed revisions to Mitigation Measure CR-1 have been accepted with modifications. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-55.

Response to Comment J-289

This is the same comment as Comment J-200. As described in Response to Comment J-200, the proposed revisions to Mitigation Measure CR-2 have not been accepted.

Response to Comment J-290

This is the same comment as Comment J-201. As described in the response to Comment J-201, the proposed revisions to Mitigation Measure CR-2 have been accepted with modifications. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-58.

Response to Comment J-291

This is the same comment as Comment J-202. As described in Response to Comment J-202, some of the proposed revisions to Mitigation Measure CR-2 have been accepted with modifications. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-58.

Response to Comment J-292

This is the same comment as Comment J-204. As described in Response to Comment J-204, the proposed revisions to Mitigation Measure CR-3 have been accepted with modifications. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-59.

Response to Comment J-293

This is the same comment as Comment J-205. As described in Response to Comment J-205, some of the proposed revisions to Mitigation Measure CR-3 have been accepted with modifications. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, pages F-61 to F-62.

Response to Comment J-294

This is the same comment as Comment J-216. As described in Response to Comment J-216, the proposed revisions to Mitigation Measure GEO-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-70.

Response to Comment J-295

This comment states that Mitigation Measure GEO-2 should not apply to the reasonably foreseeable distribution components because they would not be constructed under the PTC. This is similar to a comment made regarding Mitigation Measure HYD/WQ-1 in Comment J-226, which was the same comment that was made in Comment J-46. As described in Response to Comment J-46, the CPUC believes that it is appropriate to prescribe mitigation measures for the reasonably foreseeable distribution components, since these components were evaluated in sufficient detail to render significance conclusions. The CPUC is obligated under CEQA to evaluate the impacts of the Proposed Project, including any reasonably foreseeable consequences of the project. Therefore, the requested revisions under Comment J-295 have not been made.

Response to Comment J-296

This is the same comment as Comment J-217. As described in Response to Comment J-217, the proposed revisions to Mitigation Measure GEO-2 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-71.

Response to Comment J-297

This comment requests that the text in the “Monitoring and Reporting Action (Responsible Party)” column of Table F-1, pertaining to Mitigation Measure HAZ-1, be revised such that the fire prevention and management plan would be reviewed by CAL FIRE, since this entity functions as the County Fire Department under contract with the County of San Luis Obispo. In response to this comment, the text in Appendix F, *Mitigation Monitoring and Reporting Program*, page F-74, in Volume 2 of the FEIR, has been revised and the proposed revisions in Comment J-297 have been incorporated. For the revised text refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR.

Response to Comment J-298

This is the same comment as Comment J-223. As described in Response to Comment J-223, the proposed revisions to Mitigation Measure HAZ-1 have been accepted. These revisions have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-74.

Response to Comment J-299

This is the same comment as Comment J-224. As described in Response to Comment J-224, the CPUC does not agree with the proposed revisions. Therefore, the DEIR text has not been revised as requested by the commenter.

Response to Comment J-300

This is the same comment as Comment J-225. As described in Response to Comment J-225, the CPUC does not agree with the proposed revisions. Therefore, the DEIR text has not been revised as requested by the commenter.

Response to Comment J-301

This is the same comment as Comment J-226 and J-46. As described in Response to Comment J-46, the CPUC does not agree with the proposed revisions. Therefore, the DEIR text has not been revised as requested by the commenter.

Response to Comment J-302

This is the same comment as Comment J-228, except for a slight inconsistency in the proposed language. As described in Response to Comment J-228, the proposed revisions to Mitigation Measure NOI-1 from Comment J-228 have been accepted in Section 4.13, "Noise and Vibration," and have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, page F-81.

Response to Comment J-303

This is the same comment as Comment J-229, which proposes revisions to Mitigation Measure NOI-2, first raised and discussed in Comments J-75, and J-77 to J-79 (although slightly different proposed revisions are included Comment J-79). Please refer to the responses to the comments listed above.

Response to Comment J-304

This is the same comment as Comment J-87 to J-88. As described in Responses to Comments J-87 to J-88, some of the proposed revisions to Mitigation Measure TR-1 have been accepted, while others have not. The revisions to Mitigation Measure TR-1 have been carried over to the MMRP. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, pages F-85 to F-86.

Response to Comment J-305

This comment introduces Attachment 2, which provides comments on the Behind-the-Meter Solar Plus Storage Adoption Propensity Analysis (BTM Analysis), which is attached to this comment letter. The CPUC has provided a response to each comment, as included below.

Response to Comment J-306

The comment states that the BTM Analysis in DEIR Appendix B overestimates the number of potential adopters. The 75,000 customers referred to on page 10 of the BTM Analysis refers to both Paso Robles DPA and San Luis Obispo DPA, as data for both DPAs were provided for this analysis. In response to Comment J-306, the BTM Analysis report in the FEIR (Appendix B) has been updated to reflect this point. Specifically, the text on page 10 of the BTM Analysis has been revised as follows:

The analysis included evaluation of full 8760 time-series load profiles (i.e., 365 days times 24 hours per day) for approximately 75,000 customer meters in Paso Robles DPA and San Luis Obispo DPA.

Response to Comment J-307

The comment states that it is unclear how the BTM Analysis incorporates customers who have existing systems. The BTM Analysis includes an evaluation of the propensity of existing residential solar PV customers to additionally adopt a battery storage system. This explanation is first found on page 11 of the BTM Analysis report under Section 3.1, Approach (*“Whereas the residential analysis considered the potential for new customers to adopt solar plus storage systems, as well as the potential for existing residential solar owners to adopt an incremental BTM storage system...”*). Page 16 of the BTM Analysis discusses the relative number of adopters who are new customers, compared to customers with existing solar PV systems. In response to Comment J-307, the BTM Analysis in the FEIR has been edited to include language to clarify that the study is an economic adoption propensity analysis that does not include evaluation of whether customers reside in apartment buildings or multi-family units. Specifically, the text on page 11 of the BTM Analysis has been revised as follows:

~~Whereas~~ The residential analysis considered the potential for new customers to adopt solar plus storage systems, as well as the potential for existing residential solar owners to adopt an incremental BTM storage system. This does not consider evaluation of whether customers reside in apartment buildings, multi-family units, or are renters.

Response to Comment J-308

Please refer to Responses to Comments J-306 and J-307.

Response to Comment J-309

The comment provides a quote from the BTM Analysis and alleges that the BTM analysis does not address the likelihood or timing of customers adopting storage. The comment does not raise substantive issues regarding the DEIR adequacy, and no response is required.

Response to Comment J-310

The comment states that the findings in the BTM Analysis are high relative to the CEC statewide forecast. The comment is erroneously comparing the State’s forecasted adoption (what is predicted to occur) with adoption propensity (what is the scope of customers who could adopt, based on economic payback). This is discussed in the BTM Analysis on page 16:

Finally, it is important to understand the difference between a DER forecast and an economic propensity analysis. A forecast identifies what is likely to occur given a set of factors, such as, but not limited to, historic adoption rates, cost of technology, cost of energy, demographics, financial ability to adopt, and consumer adoption behavior. The analysis documented in this report is not a forecast; it is an economic propensity analysis. Economic propensity analyses simply identify customers for which it would make economic sense to adopt a technology, not necessarily what is likely to occur.

The FEIR has not been revised in response to this comment.

Response to Comment J-311

The comment states that in the absence of storage mandates, future storage adoption is uncertain. Please refer to Response to Comment J-310.

Response to Comment J-312

The comment states generally that the inputs and assumptions to assess BTM adoption propensity are flawed. Please refer to Responses to Comments J-313 through J-315.

Response to Comment J-313

The comment states that the BTM Analysis should include more clarity on why a 10-year payback period was chosen as a threshold. The study decided on a 10-year payback period based on the current average payback period for PV systems (7 years) and storage systems (3-5 years). The BTM Analysis in the FEIR has been edited to include language to clarify this assumption. Specifically, a footnote has been added on page 14 as follows:

A 10-year payback period was chosen as a threshold based on the current average payback period for PV systems (7 years) and BESS (3-5 years) for California residential customers.

Response to Comment J-314

The comment states that the BTM Analysis does not provide a range of dollar amounts used for the cost of a residential PV solar system. This is because the total dollar amount depends on the size of the system by customer. The study used \$2.90/watt to calculate the cost of residential systems, to align with 2019 IRP mid-cost assumptions. The BTM Analysis in the FEIR has been edited to include language to clarify this assumption. Specifically, Table 3 on page 13 of the BTM Analysis is modified to add:

PV system cost is aligned with IRP assumptions on dollars per watt (\$2.90/W) for 2019.

Response to Comment J-315

The comment requests that a citation be provided in the BTM Analysis for studies related to value of lost load used to derive the assumptions. These studies include “Value of Service Study,” a 2019 study conducted by Southern California Edison used in their grid modernization testimony, “Estimating the Value of Lost Load”, an ERCOT study from 2013, and “Estimated Value of Service Reliability for Electric Utility Customers in the United States,” an LBNL study from 2009. Page 15 of the BTM Analysis in the FEIR has been modified to include these citations.

Response to Comment J-316

The comment states that the BTM Analysis does not explicitly detail assumptions about how self-generation incentive program (SGIP) and investment tax credit (ITC) programs were factored into the analysis. For SGIP, this analysis used the available project incentives at \$0.35/Wh for 2019. Incentives decline based on the estimated storage duration in a tiered format. For most projects, the total incentive is subtracted from the total cost of the project at Year 1. For projects over 30 kW, only 50 percent of the incentive is paid upfront. The remaining 50 percent is paid over the next 5 years of the project. For ITC, these projects are assumed to charge 100 percent from solar PV systems, and are assumed to be eligible for the 26 percent ITC. The BTM Analysis in the FEIR is modified to include language to clarify this assumption. Specifically, Table 3 on page 14 of the BTM Analysis has been edited to include footnotes as follows:

¹⁰ The ITC incentives are applied at 26%, given that the projects in this analysis are assumed to charge from solar PV systems.

¹¹ SGIP incentives start at \$0.35/Wh based on 2019 incentive offers. Incentives decline based on the estimated storage duration in a tiered format. For most projects, the total incentive is subtracted from the total cost of the project at Year 1. For projects over 30 kW, only 50% of the incentive is paid upfront. The remaining 50% is paid over the next 5 years of the project.

Response to Comment J-317

The comment requests additional information about how the dollar amount of the SGIP incentive was established, and requests that SGIP not be considered an incentive because it is scheduled to end in 2024. As stated on page 11 of the BTM Analysis, Kevala modeled performance of BTM storage resources at the customer level, optimizing size to meet payback period requirements. In other words, the SGIP incentive ranged based on the customer's estimated storage adoption capacity. The BTM Analysis additionally notes on page 24 of the report, "to align with existing modeling inputs the CPUC currently uses for its IRP modeling, Kevala's model uses the performance assumptions for storage and total cost of PV + storage, including the application of NEM policy and SGIP incentives as these policies and incentives are currently administered. In advance of conducting a targeted procurement, these inputs may need to be adjusted to reflect the most current policies and costs." Given that the other parameters of the BTM Analysis use 2019 data when possible, the DEIR text has not been edited in response to this comment.

Response to Comment J-318

The comment requests that the ITC program incentives should not be factored into the BTM Analysis. The BTM Analysis notes on page 26, "to align with existing modeling inputs the CPUC currently uses for its IRP modeling, Kevala's model uses the performance assumptions for storage and total cost of PV + storage, including the application of NEM policy and SGIP incentives as these policies and incentives are currently administered. In advance of conducting a targeted procurement, these inputs may need to be adjusted to reflect the most current policies and costs." Given that the other parameters of the analysis use 2019 data when possible, the DEIR text has not been edited in response to this comment.

Response to Comment J-319

This comment reiterates concerns previously raised about the economic propensity analysis. Please refer to Responses to Comments J-317 and J-318.

Response to Comment J-320

The comment notes that achieving estimated adoption propensity would require a significant incentive to influence customer behavior, and compares the offered incentive to the estimated unit cost of the Proposed Project's distribution components. The adoption propensity identifies total propensity to adopt, and does not assume that all adopters necessarily will or need to adopt. If a cost comparison analysis to the Proposed Project's distribution components is conducted, it should likely only include necessary adopters incentivized to meet the grid need (MW) forecasted under PG&E's Distribution Deferral Opportunity Report (DDOR). This information can be found on pages 6-7 of the BTM Analysis, in Table 2, "*PG&E 2019 DDOR - Specific Facility Capacity and Reliability Needs Addressed by the Proposed Project That Could Potentially be met through DERs.*"

Response to Comment J-321

The comment states that peak period of use and peak period of solar generation do not align. The comment misinterprets Table 4: *Summary Results for the BTM Adoption Propensity Analysis - All Customer Types in the Paso Robles DPA* (BTM Analysis, p. 17), which represents installed capacity, and not generation during peak periods. The comment is incorrect.

Response to Comment J-322

The comment summarizes statements and data from the BTM Analysis. The comment does not address substantive issues in the DEIR, and no additional response is necessary.

Response to Comment J-323

The comment states that feeder capacity limits the ability for adoption propensity estimates to reach stated levels of adoption, under various scenarios. The adoption propensity identifies total propensity to adopt, and does not assume that all adopters necessarily will or need to adopt. Likely adoption should only be incentivized to meet the grid need (MW) forecasted under PG&E's DDOR. This information can be found on pages –7 of the BTM Analysis, in Table 2, "*PG&E 2019 DDOR – Specific Facility Capacity and Reliability Needs Addressed by the Proposed Project That Could Potentially be met through DERs.*"

Response to Comment J-324

The comment states that study does not comment on the timing or sequencing of likely installation onto the grid, which impacts hosting capacity. The BTM Analysis does not intend to calculate hosting capacity, run power flow, or consider the existing project queue, all which should be considered if BTM DER procurement were considered and selected as an alternative. Where generation hosting capacity is 0, such as at Paso Robles 1104 feeder, load hosting capacity and storage-only adoption could be considered. In addition, these considerations should not be conducted on the entire total propensity to adopt, and likely only needs to consider necessary adopters incentivized to meet the grid need (MW) forecasted under PG&E's DDOR. This information is found on pages 6-7 of the BTM Analysis, in Table 2, "*PG&E 2019*

DDOR - Specific Facility Capacity and Reliability Needs Addressed by the Proposed Project That Could Potentially be met through DERs."

Response to Comment J-325

Please refer to Response to Comment J-324.

Response to Comment J-326

Please refer to Response to Comment J-324.

Response to Comment J-327

Please refer to Response to Comment J-324.

Response to Comment J-328

Please refer to Response to Comment J-324.

Response to Comment J-329

Please refer to Response to Comment J-324.

Response to Comment J-330

The comment notes that 10 percent of the Tesla PowerWall is held in reserve, and holds a 5 kW continuous output rating. These are correspondingly the specifications used in the BTM Analysis. The FEIR has been edited to note these that these specifications were used. Specifically, Table 3 on page 13 of the BTM Analysis has been updated to include the following text:

5 kW continuous output rating.

Response to Comment J-331

The comment notes that the system total cost may be lower than reported total costs by installers and the study overestimates the number of BTM adopters. The BTM Analysis aims to align with the 2019 Integrated Resources Plan (IRP) as much as feasible, and so used the mid-cost assumption for storage identified in the 2019 IRP.

Response to Comment J-332

The comment notes that no BTM storage systems are approved for grid export, and recommends that the capacity reduction per customer would be closer to 2kW by reducing customer's own peak demand. The BTM Analysis has been modified to note that there is no off-the-shelf solution for large-scale BTM aggregation at this time, and estimates for capabilities in 2024 should be considered when evaluating solutions feasibility. Specifically, page 24 of the BTM Analysis is updated to include the following text:

(a master control system, of which there is currently no existing off-the-shelf solution, may be required for this).

Page 27 of the BTM Analysis is also updated to include the following text:

A potential RFP would need to consider whether commercial solutions for large-scale aggregation may be available at the time of the procurement.

The comment also incorrectly assumes that Tables 4, 5, and 7 state reduction capacity. These tables represent installed capacity.

Response to Comment J-333

The comment notes that there is currently no ability to coordinate discharge. Kevala agrees with this comment and notes in its “Recommendations” that these should be discussed when considering Request for Proposals (RFP) requirements. First, the revision to page 24 shown in the response to Comment J-332 partially addresses this comment. In addition, page 27 of the BTM Analysis has been updated to include the following text:

The RFP should focus on aggregators capable of delivering the quantified net load impacts, including the capability to coordinate discharge, at the time of RFP issuance. At the time of this report, those capabilities are very limited.

Response to Comment J-334

Please refer to Response to Comment J-333.

Response to Comment J-335

This comment is Attachment 3, the commenter’s Revised Air Quality Analysis. This analysis includes the commenter’s estimated construction emissions, GHG emissions, construction tasks and timeline for the Proposed Project divided up by phases, data regarding helicopter use, and the CalEEMod report.

For the CPUC’s response to comments regarding construction emissions, please refer to Master Response 11. For the CPUC’s response to comments regarding air quality mitigation measures, please refer to Master Response 13. With regard to the comment’s Attachment 3, providing updated calculations regarding helicopter use, please refer to Response to Comment J-69. At this time, given uncertainty with respect to final construction schedules and equipment that may undergo additional changes, as well as inadequate detail to fully verify all the assumptions in particular for helicopter activity and flight times, there will be no changes to the EIR construction emissions estimates, nor any change in the significance determination. With consideration of the Proposed Project Applicants’ provided estimates and the estimates shown in the EIR, a reasonable range of emissions has been presented and a reasonable upper bound was used to estimate emissions and establish the significance determination. Revisions to Mitigation Measure AQ-1 made as part of the Recirculated DEIR (which have been accepted in this FEIR) will allow for the Applicants to potentially reduce or eliminate offset mitigation if they are able to demonstrate by tracking actual emissions from construction that the emissions are below the Quarterly Tier 2 ROG and NO_x threshold, provided in Table 4.3-3 on page 4.3-15 in Volume 1 of the FEIR.

Response to Comment J-336

This comment is Attachment 4, the commenter’s Revised Helicopter Noise Analysis. This memorandum provides the commenter’s revised assumptions for helicopter use during the construction of the Proposed Project. The commenter indicates that these assumptions are

based on the Fulton-Fitch Mountain Reconductoring project. This includes a discussion of what type of helicopters will be needed and for what construction tasks they will be used. With regard to the comment's Attachment 4, providing updated calculations regarding helicopter use, please refer to Response to Comment J-77.