

Chapter 4

REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT

This chapter describes and presents revisions made to the Draft Environmental Impact Report (DEIR) for the Estrella Substation and Paso Robles Area Reinforcement Project (Proposed Project). The DEIR was revised based on certain specific comments, as identified in Chapter 3, *Individual Responses to Comments*, as well as to update the document and create the Final Environmental Impact Report (FEIR) and to ensure consistency with changes made in the Recirculated DEIR. All substantive, new revisions to the DEIR are shown in underline/~~strikeout~~ in this chapter and in Volumes 1 (Main Body) and 2 (Appendices) of this FEIR. As described in Chapter 1, *Introduction*, revisions to the DEIR¹ that were previously made as part of the recirculation have been accepted in this FEIR and are not included in this chapter.

4.1 Changes in Response to Specific Comments on the Draft Environmental Impact Report

As indicated in the individual responses to comments (see Chapter 3 of Volume 3 of this FEIR), the DEIR text was revised based on certain specific comments received. Although the changes are shown in Volumes 1 and 2 of this FEIR, the revisions are reproduced here for reference. The changes are presented in the order in which they appear in the documents (Volumes 1 and 2 of the FEIR) and the page numbers listed refer to the numbering in the FEIR, not the original DEIR.

4.1.1 Volume 1 – Main Body

Executive Summary

In response to Comment H-55, the text on page ES-2 has been revised to correct the maximum elevation in the project vicinity. Specifically, the text has been revised as follows:

Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 970 ~~960~~ feet above mean sea level.

¹ As part of the recirculation, revisions were made to the following portions of the DEIR:

- Chapter 2, *Project Description*
- Section 4.2, “Agriculture and Forestry Resources”
- Section 4.3, “Air Quality”

In response to Comment H-56, the text on page ES-4 has been revised to reflect the larger substation parcel. Specifically, the text has been revised as follows:

The 70 kV substation would be located immediately adjacent to the 230 kV substation within the same 15-acre ~~site~~ area of the 20-acre site.

In response to Comment H-57, the text on page ES-4 has been revised to modify the description of electrical equipment at the 230 kV substation. Specifically, the text has been revised as follows:

Electrical equipment at the 230 kV substation would be located within an enclosed fenced area and would include breakers, breaker-and-a-half bays, operating buses, transformers, air break switches, insulated circuit breakers, dead-end steel structures, and lightning surge arresters.

In response to Comment H-58, the text on page ES-5 has been revised to provide additional information about ultimate buildout of the Estrella Substation. Specifically, the text has been revised as follows:

Ultimate buildout of the Estrella Substation could include an additional 230 kV interconnection, a second 230/70 kV transformer, three additional 70/21 kV transformers, and associated equipment (e.g., breakers, switches). The ultimate substation buildout could also accommodate future inside-the-fence improvements, including the potential future construction of ballistic walls around the transformer or fire walls between the proposed 230 kV transformer and the additional 230 kV transformer. The ultimate substation buildout would support additional distribution and power lines emanating from the Estrella Substation; however, the specific routes and lengths of these lines are not known at this time and are not evaluated in the DEIR.

In response to Comment J-92, the text on page ES-6 has been revised to clarify that a land survey would not be required to mark staging areas and work areas. The text has been revised 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.

In response to Comment H-59 and subsequent revisions to this comment included in HWT's response to Data Request No. 6, the text on page ES-6 has been revised to reflect the revised amount of cut and fill anticipated to be required as part of the earthwork activities for construction of the substation. The text has been revised as follows:

Based on preliminary grading design, Earthwork activities for the substation are anticipated to result in approximately ~~50,000~~ 68,000 cubic yards of cut and fill, balanced

on site to the maximum extent possible. The cut and fill figure does not include approximately 16,500 cubic yards of topsoil which would be stripped and stockpiled during construction. Of the 16,500 cubic yards, about 4,000 cubic yards would be used on site, and the balance would be removed.

In response to Comment J-94, the text on page ES-11 has been revised to remove the sub area description for the Bonel Ranch site to maintain consistency across multiple alternative descriptions. Specifically, the text has been revised 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.

In response to Comment J-20, the text on page ES-13 has been revised to clarify that Alternatives BS-2 and BS-3 could be evaluated through the CPUC's Distribution Infrastructure Deferral Framework (DIDF). Specifically, the text has been revised as follows:

Both Alternatives BS-2 and BS-3 could ~~developed~~ evaluated through the CPUC's Distribution Infrastructure Deferral Framework (DIDF) pursuant to the Distribution Resources Plan proceeding (R.14-08-013).

In response to Comment J-95, the text on page ES-15 has been revised to indicate that EMFs and property values are outside the scope of the CEQA analysis. The text has been revised as follows:

- 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

In response to Comment H-60 and J-96, the text on page 1-1 has been revised to correct the citation for the basic purposes of CEQA. Specifically, the text has been revised as follows:

Per CEQA Guidelines section ~~15022~~ 15002, CEQA's basic purposes are to:

Chapter 2, Project Description²

In response to Comment H-61, Figure 2-1 on page 2-4 has been revised to correct the relative position of the 500 kV transmission line that is depicted. The revised figure is shown on the following pages.

In response to Comment H-65, Figure 2-4 on page 2-7 has been revised to correct the relative position of the 500 kV transmission line that is depicted. The revised figure is shown on the following pages.

In response to Comment I-32, the text on page 2-13 has been revised to clarify the statement regarding projected population growth in the City of Paso Robles and to add citations for this information. Specifically, the text has been revised as follows:

Overall, City planners are estimating a nearly 50 percent increase in the population of Paso Robles by 2045 (NEET West and PG&E 2020a; City of Paso Robles 2014; U.S. Census Bureau 2014).

In response to Comment R.B-26, the text on page 2-68 has been revised to clarify that HWT has purchased the 20-acre portion of the parcel on which the Estrella Substation would be located. Specifically, the text has been revised as follows:

The parcel of land where Estrella Substation would be constructed is under private ownership. ~~An affiliate of HWT has an option agreement to purchase~~ the approximately 20-acre portion of this parcel.

Based on Comment J-92, the text on page 2-69 has been revised to indicate that survey marking would not be required for establishment of staging and work areas. The text has been revised as follows:

Construction of the Estrella Substation would follow a typical sequence beginning with ~~survey marking of~~ 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.

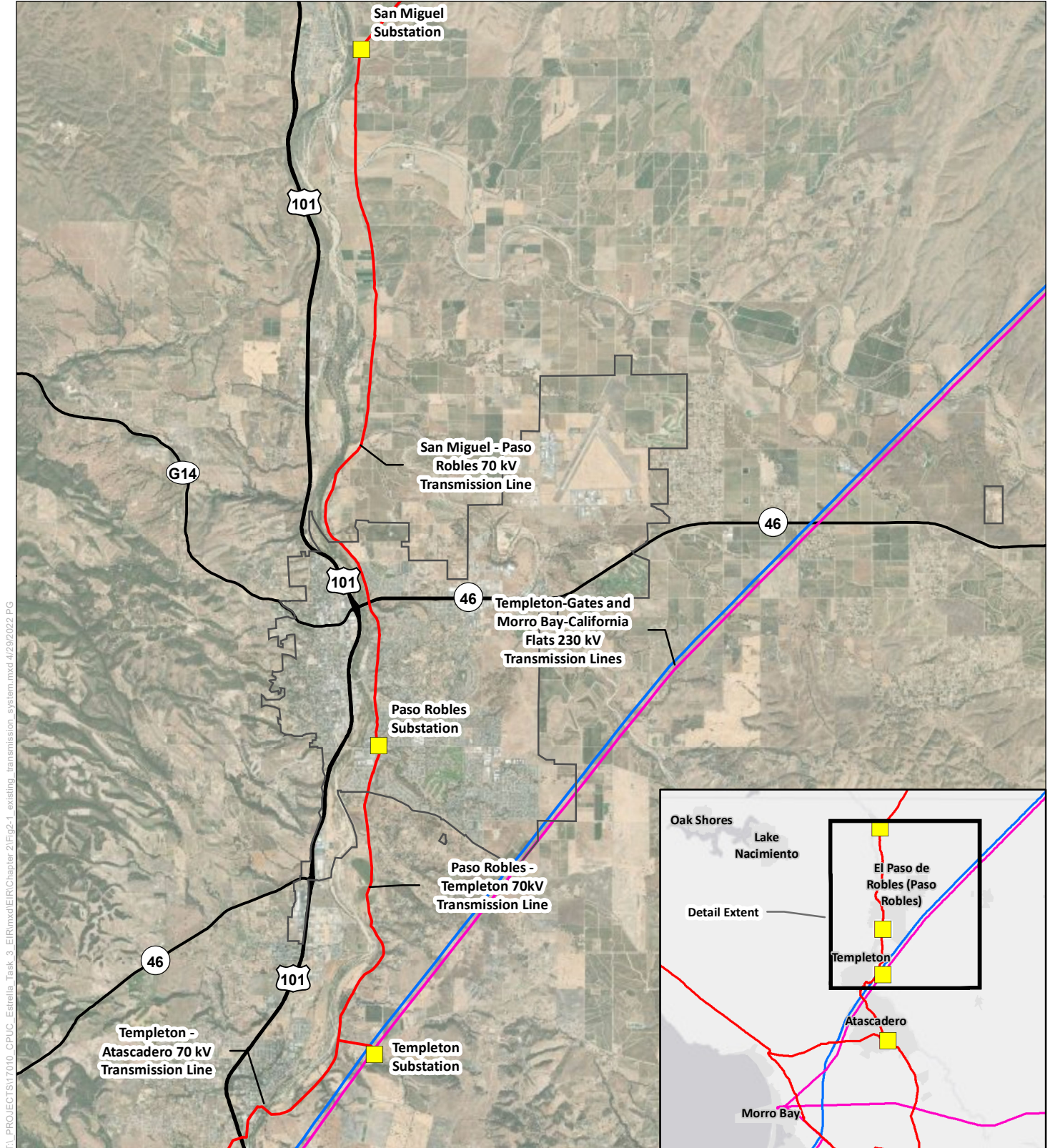
² As noted above, revisions to Chapter 2, *Project Description* were provided as part of the recirculated DEIR. Those changes, having already been circulated for public review, are accepted in Volume 1 of this FEIR (i.e., not shown in underline/strikeout) and are not included in this chapter. Only new changes to Chapter 2, since the recirculation, are presented in this section.

In response to Comment R.B-27, the text on page 2-71 has been revised to clarify that the 230 kV portion of the Estrella Substation could be constructed on concrete piers or a concrete slab. Specifically, the text has been revised as follows:

All equipment including breakers, bus supports, insulators, bus and switches would be installed or anchored into final position, grounded, and if required wired back to the control house. The control house will be delivered and installed on concrete piers or a concrete slab.

In response to Comment R.B-28, the text on page 2-85 has been revised to correct a typographical error whereby noise was incorrectly written as “nose”. Specifically, the text has been revised as follows:

Occasionally, work may occur during the evening hours for activities such as monitoring the substation foundation curing process, and testing and commissioning the new substation components. However, such activities would not normally generate loud noise.



T:\PROJECTS\17010_CPUC_Estrella_Task_3_EIR\mxd\EIR\Chapter_2\Fig2-1_existing_transmission_system.mxd 4/29/2022 PG

Basemap Sources: Source: Esri, Maxar, GeoEye, Earthstar Geographics,

Figure 2-1

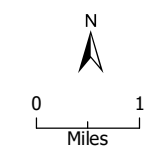
Existing Transmission System

Existing Substation
 Existing Substation

Existing Transmission Lines
 70 kV
 230 kV
 500 kV

Paso Robles City Limits
 Paso Robles City Limits

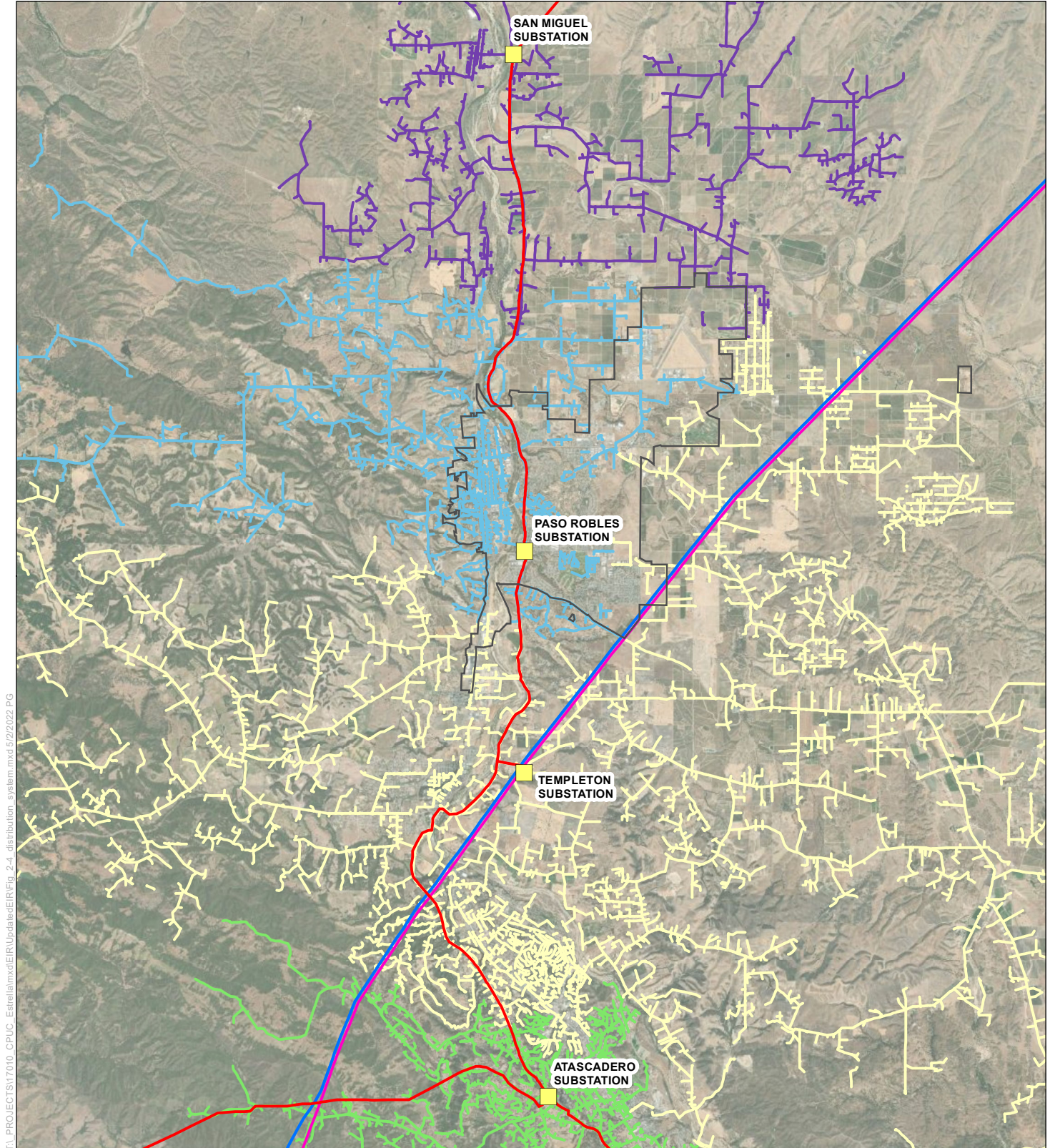
Highway
 Highway



Source: Source: NEET West and PG&E 2017

Note: The route variations shown are offset in order to display the alignments of the alternative routes that may overlap in places.

Estrella Substation and Paso Robles Area Reinforcement Project



T:\PROJECTS\17010_CPUC_Estrella\mxd\ER\Updated\ER\Fig_2-4_distribution_system.mxd 5/2/2022 PG

Basemap Sources: Source: Esri, Maxar, GeoEye, Earthstar Geographics,



- Existing Substation
- Paso Robles City Limits
- Existing Transmission Lines**
- 70 kV
- 230 kV
- 500 kV
- Existing Distribution**
- ATASCADERO
- PASO ROBLES
- SAN MIGUEL
- TEMPLETON

Figure 2-4
Existing Distribution System

Chapter 3, Alternatives Description

In response to Comment H-85, the text on page 3-4 has been revised to modify the amount of mineral oil that would be used for the transformers within the substation under Alternative SS-1. Specifically, the text has been revised as follows:

The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (approximately ~~15,290~~ 16,000-18,000 gallons) as the Proposed Project.

In response to Comment J-38, text has been added to pages 3-74 to 3-75 to provide additional information regarding outages that could occur associated with Alternative PLR-3 due to faults within the underground segment. Specifically, the following text has been added:

By monitoring the current coming into and leaving the underground section, any differential in the current would trip the substation relays/circuit breakers feeding both ends of the transmission line. If the electrical current differential relays trip, it can be determined that the fault is in the underground section of the line and not the overhead portion of the circuit. This would allow local repair crews to concentrate repair efforts on the overhead sections of the line and handle repairs more quickly. With differential relays detecting no faults, retesting of the underground line segment could occur as soon as the line cools – in about 30 minutes. However, if the fault is in an underground section of the lines, lengthy outages can be expected, as Pacific Gas & Electric Company's (PG&E's) transmission underground crews must travel from Daly City to the underground segment, locate the electrical fault cause, and make the repairs.

In response to Comment J-65 and J-230, text has been added to page 3-75 to indicate that the transition stations under Alternative PLR-3 would each require a small heating, ventilation, and air conditioning (HVAC) unit to keep the controls and relays cool. Specifically, the following text has been added:

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.

In response to Comment J-43, text has been added to pages 3-75 to 3-76 to further describe the main phases of construction for Alternative PLR-3. Specifically, the following text has been added:

Installation of vaults would require more substantial trenching/excavation, while construction of transition stations may include some excavation, grading, pouring of concrete foundations, and installation of electrical equipment and facilities.

The three main phases of construction (trenching/duct bank installation, vault installation, and cable pulling, splicing, and termination) for the underground line segment are further described as follows:

- a. **Trenching/Duct Bank Installation.** After the two circuit routes are marked and determined to be free of underground obstructions, the pavement or cement within the first trench line will be removed. Jackhammers will be used to break up sections of concrete that the saw-cutting and pavement-breaking machines cannot handle. The typical trench dimensions for installation of a single circuit will measure approximately 2 feet wide by 6 feet deep, although typical trench depths may vary depending on soil stability and the presence of existing substructures. The trench will be widened and shored where needed to meet California Occupational Safety and Health Administration safety requirements. Dewatering will be conducted using a pump or well points to remove water from the trench.

A maximum open trench length of 150 to 300 feet in or along the street will be typical at any one time, depending on local permitting requirements. Steel plating will be placed over the trench to maintain vehicular and pedestrian traffic across areas that are not under active construction. Traffic controls will also be implemented to direct local traffic safely around the work areas.

As the trench for the underground 70 kV cable is completed, PG&E will install the cable conduit, ground wire, and concrete conduit encasement duct bank. The duct bank typically will consist of four 6-inch-diameter polyvinyl chloride (PVC) conduits (PG&E may elect to install 1-2 spare conduits for future use). The dimensions of the duct bank will be approximately 24 inches wide by 34 inches in height. Once the PVC conduits are installed, thermal-select or controlled backfill will be transported, placed and compacted. A road base backfill or slurry concrete cap will be installed, and the road surface will be restored.

The installation of the first trench and duct bank, in or along streets, will be completed before starting the installation of the second trench due to traffic control and congestion concerns.

- b. **Vault Installation.** Splice vaults will be installed at approximately 1,600- to 2,000-foot intervals during trenching (approximately 10-12 vaults total for this segment). The total excavation footprint for a vault will be approximately 22 feet long by 12 feet wide by 10 feet deep. Installation of each vault will occur over a one-week period with excavation and shoring of the vault pit followed by delivery and installation of the vault, filling and compacting the backfill, and repaving the excavation area. Each underground circuit will require its own set of splice vaults (5-6 vaults per circuit over the 1.2-mile route).
- c. **Cable Pulling, Splicing, and Termination.** After installation of the conduit and splice vaults, PG&E will install cables in the duct banks. Each cable segment will

be pulled into the duct bank, spliced at each of the vaults along the route, and terminated at the transition stations.

In response to Comment H-86, the text on page 3-93 has been revised to modify the amount of mineral oil that would be used for the transformers within the substation under Alternative SE-1A. Specifically, the text has been revised as follows:

The quantity of mineral oil to be used for transformers for Alternative SE-1A would be the same (approximately ~~15,290~~ 16,000-18,000 gallons) as the Proposed Project.

In response to Comment J-107, the text on page 3-114 has been revised to properly show the intended heading for “Sites.” The text has been revised as follows:

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~~

Sites

In response to Comment J-24, the text on page 3-128 has been revised to clarify the changes to the distribution capacity need, as identified in PG&E’s 2020 Distribution Deferral Opportunity Report (DDOR). Specifically, the text has been revised as follows:

In their 2020 filing, however, PG&E indicated that the distribution capacity that is eligible for consideration in the DIDF no longer exists within the 10-year planning horizon (PG&E 2020a).

In response to Comment J-17, text has been added on page 3-133 to clarify and reiterate uncertainty with respect to potential use of the DIDF for implementation of Alternative BS-2. Specifically, the following text has been added:

A full analysis of hypothetical DIDF outcomes and types of DER 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.

Similarly, in response to Comment J-17, text has been added to page 3-136 to clarify and reiterate the uncertainty with respect to use of the DIDF and implementation of Alternative BS-3. Specifically, the following text has been added:

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.

Chapter 4, Environmental Analysis

Section 4.0, Introduction to the Analysis

None.

Section 4.1, Aesthetics

In response to Comment H-87, the text on page 4.1-3 has been revised to reflect the larger substation parcel size of 20 acres. Specifically, the text has been revised as follows:

The proposed Estrella Substation site occupies ~~an~~ approximately 15 acres ~~15-acre area of a 20-acre site~~ to the north of Union Road.

In response to Comment I-46, the text on pages 4.1-3 to 4.1-4 has been revised to clarify the visual characteristics of the Golden Hill Industrial Park. Specifically, the text has been revised as follows:

As noted above, the Proposed Project's 70 kV power line alignment follows Union Road to the junction with SR 46, at which point the 70 kV line crosses over SR 46 in a northerly direct, before passing through an industrial business district (i.e., Golden Hill Industrial Park). ~~This~~ The Golden Hill Industrial Park area is relatively flat and characterized by existing industrial and commercial uses and structures. KOP 5 (Figure 4.1-6) shows a public view from SR 46 facing west toward the point at which the new power line would cross the highway and enter the Golden Hill Industrial Park. Table 4.1-1 provides a detailed description of the visual conditions shown in KOP 5.

In response to Comment I-46, the text on page 4.1-4 has been revised to clarify the visual characteristics and viewers associated with KOP 6. Specifically, the text has been revised as follows:

KOP 6 (Figure 4.1-7) shows a public view of the northern-most public access portion of Golden Hill Road, the gated entrance to the Circle B Springs private road, and the Cava Robles RV Park entrance looking north from just north of the San Antonio Winery. Table 4.1-1 includes a detailed description of the existing visual conditions shown in KOP 6. North of Lake Place, the alignment turns west and then joins and continues along Buena Vista Drive until ultimately reaching River Road. The landscape in this area is characterized by gently rolling hills, vineyards, pastures, and residential development. The proposed 70 kV alignment is visible in the foreground along Golden Hill Road and Buena Vista Drive, as well as from private lanes and nearby residences. Patrons of nearby businesses on Golden Hill Road, such as Cava Robles RV Park, also have temporary views of the 70 kV alignment on the public access portion of Golden Hill Road.

In response to multiple comments (refer to Master Response 3), text has been added on page 4.1-4 to describe the heights of the existing transmission line poles along the reconductoring segment for the Proposed Project. Specifically, the following text has been added:

The existing line then crosses Union Road, continues south for approximately 1 mile (generally along hilltops above River Road) and then crosses open pastures and the backside of neighborhoods until it ends at the Paso Robles Substation. Within the reconductoring segment, the existing pole heights range between 50 and 80 feet tall.

In response to Comment J-108, the text on page 4.1-4 has been revised to clarify that the northern distribution segment would not be installed within the median. Specifically, the text has been revised as follows:

The reasonably foreseeable northern distribution line segment would ~~follow parallel~~ the existing SR 46 right-of-way (installed ~~within the median~~ on one side or the other on private property).

In response to Comment I-49, the text on page 4.1-6 has been revised to recognize visitors to the Cava Robles RV Park as recreationists. Specifically, the text has been revised as follows:

Recreationists with views of the Proposed Project's 70 kV power line would include users at Barney Schwartz Park (see KOP 3 [Figure 4.1-4] and KOP 4 [Figure 4.1-5]) and Paso Robles Sports Club. Visitors at the Cava Robles RV Park, which offers recreational opportunities on its private property, would also have varying degrees of views of the Proposed Project's 70 kV power line. KOP 6 (Figure 4.1-6) shows a typical view of a Cava Robles RV Park visitor entering the facility from Golden Hill Road. Golfers at the privately-owned River Oaks Golf Course would also have views of the Proposed Project's 70 kV reconductoring segment (as well as the reconductoring segment under Alternatives PLR-1A and PLR-1C), as would users of the Salinas River Parkway Trail.

In response to Comment I-49, the text on page 4.1-7 has been revised to remove mention of visitors to Cava Robles RV Park from the discussion of "Patrons of Nearby Businesses." Specifically, the text has been revised as follows:

Other businesses along the Proposed Project 70 kV power line alignment in this area catering more to tourists include ~~Cava Robles RV Park and~~ Riboli Family of San Antonio Winery and Event Center. With the exception of the 1-mile segment discussed above, the majority of the Proposed Project, the reasonably foreseeable distribution components, and many of the alternatives are located in rural, agricultural areas, where there are few businesses. The northern portion of Alternative SE-PLR-2 would pass through commercial areas of the City along South River Road, while FTM Site 2 would be located within the Woodland Plaza II shopping center, where a number of existing businesses are located.

Patrons of businesses in the area of the Proposed Project, reasonably foreseeable distribution components, and alternatives would have temporary views of the new power line or distribution/alternative facilities. Patrons of those businesses that cater to

tourists, such as ~~Cava Robles RV Park and~~ Riboli Family of San Antonio Winery and Event Center, may have a somewhat higher expectation of the surrounding landscape because these businesses market patronage experiences to include scenic views and drives to and around these properties and surrounding areas (Sun RV Resorts 2020). For these reasons, viewer concern ratings are considered moderate or moderate-to-high.

In response to Comment J-109, the text on page 4.1-8 has been revised to clarify that the northern distribution segment would not be installed within the median. Specifically, the text has been revised as follows:

Additionally, the northern reasonably foreseeable new distribution line segment would be installed ~~within the median of~~ on one side of SR 46 on private property, while Alternative PLR-1A would also traverse SR 46 near the intersection with Branch Road.

In response to Comment I-50, the text in Table 4.1-1, within the column entitled “Visibility and Visual Conditions,” on page 4.1-28, has been revised to clarify that Cava Robles RV Park visitors would also have views from KOP 6. Specifically, the text has been revised as follows:

Representative views from perspective of motorists, including Cava Robles RV Park visitors entering the private resort, and the closest residence.

In response to Comment I-54, the text in Table 4.1-1, within the column entitled “Visibility and Visual Conditions,” on page 4.1-28, has been revised to describe landscaping present along the frontage of Golden Hill Road immediately west of the Cava Robles RV Park. Specifically, the text has been revised as follows:

From this viewpoint, the landscape includes mature trees, landscaping, security gate, road leading to the Cava Robles RV Park (pictured at right in the photo), and open space. No existing overhead distribution lines are apparent from this KOP.

In response to Comment I-51, text has been added on page 4.1-37 to describe the approach for evaluating effects on scenic vistas. Specifically, the following text has been added:

The visual impacts were compared against the thresholds of significance discussed below. For the purposes of evaluating effects on scenic vistas, scenic vistas include open space viewsheds and natural landmarks identified in the City of Paso Robles General Plan, as described in Section 4.1.4.

In response to Comment J-110, the text on page 4.1-38 has been revised to clarify that the Proposed Project, reasonably foreseeable distribution components, and alternatives are located entirely within non-urbanized areas. Specifically, the text has been revised 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.

In response to Comment B-11, the text on pages 4.1-38 to 4.1-39 has been revised to describe the effect of the 70 kV power line on views looking toward the river bluff from the Salinas River Parkway Trail. Specifically, the text has been revised as follows:

Within the area of the Proposed Project, several open space viewsheds have been identified by the City of Paso Robles in its General Plan, including the field at the north end of Ramada Drive (between the railroad and Salinas River), oak-covered hillsides, Salinas River, and the view from Barney Schwartz Park southwest toward and into the Chandler Ranch area (City of Paso Robles 2003). In general, construction and operation of the Proposed Project would not substantially affect these scenic vistas, as described further below.

The Estrella Substation would be placed within an existing vineyard and would not ~~affect~~ ~~or~~ substantially obstruct views of oak-covered hillsides that exist throughout the greater Paso Robles area. The Proposed Project's 70 kV power line would not affect the view southwest from Barney Schwartz Park; however, the power line would be visible from Barney Schwartz Park looking to the north. This view and the simulated change following development of the Proposed Project are shown in Figure 4.1-5. As indicated in the figure, there would be little discernable change to the viewshed from this location as a result of the Proposed Project.

The field at the north end of Ramada Drive would be well south of the southern terminus of the Proposed Project's 70 kV reconductoring segment (and on the other side of the Salinas River) and this scenic vista would not be affected.

While the City of Paso Robles General Plan does not specify specific scenic vista points along the Salinas River, the 70 kV power line would be visible from portions of the Salinas River Parkway Trail, which runs parallel to the Salinas River and River Road and offers scenic viewing opportunities of riparian vegetation along the river. Portions of the Proposed Project's 70 kV reconductoring segment that traverse the hillside above River Road would be visible from Salinas River Parkway Trail; other portions of the reconductoring segment would be screened by vegetation and existing landforms. Because existing views from the Salinas River Parkway Trail currently include the existing power line along the Salinas River Bluff, the new replacement poles and power line would represent an incremental, relatively minor visual change.

In general, while the Proposed Project's 70 kV power line may be visible from several viewpoints throughout the City of Paso Robles and surrounding area, the degree of change relative to baseline conditions would be minor and would not substantially affect the scenic views. As a result, this impact would be **less than significant**.

In response to Comment H-88, the text on page 4.1-40 has been revised to reflect the larger substation parcel size of 20 acres. Specifically, the text has been revised as follows:

Construction of the new substation would occur on approximately 15- acres within a 20-acre parcel adjacent to Union Road, although local topography would provide some screening of construction activities.

In response to Comment I-53, the text on pages 4.1-40 to 4.1-41 has been revised to include a description of the helicopter landing zones and construction areas that would be visible during Proposed Project construction. Specifically, the text has been revised as follows:

Construction of the Proposed Project's 70 kV power line segment would have similar effects on aesthetics as the Estrella Substation, although the power line construction would take longer (18 months total). Construction activities would include some grading and vegetation removal (e.g., for site preparation and establishment of work areas, pull and tension sites, and staging areas), installation of new power poles, removal of existing poles and distribution lines, and conductor stringing/pulling. Topography, vegetation, and existing structures would provide some screening along the power line route. Helicopter landing zones may also be temporarily visible from nearby land uses. In general, the presence of construction vehicles, equipment, materials, and workers along the Proposed Project's 70 kV route would adversely affect the visual character and quality of the area, while the grading and vegetation removal would alter landforms and vegetation along the alignment. Again, however, these impacts would be temporary.

Motorists, residents, recreationists, and tourists in close proximity to the Proposed Project's 70 kV power line route and two staging areas would have views of the construction equipment and activities at varying levels and durations from SR 46 and local roads including Union Road, Golden Hill Road and North River Road. In particular, the Proposed Project's 34.8-acre Golden Hill Road Staging Area would be in an urban area that is visible to motorists and a few nearby residents on Golden Hill Road as well as from adjacent industrial businesses. This staging area would not be inconsistent with zoning regulations and the temporary adverse effects on public views are not considered significant. The Proposed Project's other staging area located at Navajo Avenue would be sited in an elevated area that is largely screened from public view but may be partially visible to a few nearby residences. In addition, the reconductoring segment of the Proposed Project's 70 kV power line would pass through more densely developed (i.e., urbanized) areas of Paso Robles, where some residents would have close-up views of the construction activities. View durations for motorists would vary depending on topography, vegetation screening, and the curvature of the road itself. Typically, view durations would be shorter along curvy roads but longer along straight roads where power line construction activities occur parallel to the road. Nonetheless, construction activities along the power line route would be temporary at each work area as construction progresses and the visual effects would not be dissimilar from any other type of construction project in the area. Therefore, this impact would be **less than significant**.

In response to multiple comments (refer to Master Response 3), the text on page 4.1-42 has been revised to add discussion of the visual changes brought about by the taller poles that would be required for the reconductoring segment. The same passage has also been modified in response to Comment J-111 to clarify that the proposed new power line segment would not be inconsistent with zoning regulations. Specifically, the text has been revised 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. Dissimilarly, the reconductoring segment would replace existing poles and reconductor the existing power line. Along the reconducted segment, the new replacement poles would range between 71 and 108 feet tall though most poles typically range between 80 and 90 feet in height. The maximum height of a replacement pole would be 108 feet. The maximum change in pole height would be 58 feet where a 108-foot-tall pole replaces an existing 50-foot-tall pole. The visual change would be more pronounced in select areas where poles would reach up to 108 feet tall and would be more noticeable to nearby residents. Public views of the replacement poles would primarily be visible to motorists traveling near the alignment as well as recreationists using the River Walk Trail. Motorists' views would be of short duration. Recreationists may notice the taller poles along portions of the trail, however, the visual change would be incremental because the poles would be installed along the existing alignment. Most views from the Salinas River Parkway Trail are focused on the natural setting in foreground and it is reasonable to assume that local recreationists in the area are accustomed to viewing power lines and poles along the reconductoring segment. For these reasons and because these linear man-made structures already exist along the reconductoring segment; the replacement poles thus, it would not substantially degrade the existing visual character or quality of public views change the existing visual character or quality in this area. It is worth noting that the new 70 kV power line segment and reconductoring segment would not be or be inconsistent with zoning regulations (transmission structures are allowed in all zoning districts along the alignment). As shown in Figure 4.1-4 through Figure 4.1-10, the aesthetic impacts of the new 70 kV power line would be incremental in many locations, and therefore not be significant.

In response to Comment J-112, the text on page 4.1-43 has been revised to indicate that landscaping incorporated in front of the substation would need to comply with the standards provided in PG&E's Wildfire Safety Inspection Program and CAL FIRE's defensible space guidelines. Specifically, the text has been revised 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 in 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.

In response to Comment I-55, the text on page 4.1-43 has been revised to describe the additional requirement in Mitigation Measure AES-1 and how it would help reduce the Proposed Project's effects on visual character and visual quality in the area along Golden Hill Road. The text revisions also clarify that the visual simulation shown for KOP 6 shows newly installed weathered steel poles. Specifically, the text has been revised as follows:

Mitigation Measure AES-1 would also require that transmission structures have a dulled finish. Additionally, this mitigation measure would require the Applicants, to the extent practicable, replace existing landscaping that is removed during construction of the proposed 70 kV power line and new poles, unless a landowner specifically requests non-replacement of landscaping.

While Mitigation Measure AES-1 would reduce the adverse effects on the visual character and quality of views of the Estrella Substation site and along the 70 kV power line alignment, it would not reduce these impacts to a level that is less than significant. The substation facilities would still dominate views from Union Road, and considering the moderate-to-high visual quality and sensitivity of this site, as well as the designation of Union Road as a local scenic corridor, the impacts on the visual character and quality would be significant. ~~Likewise, even if~~ Incorporating the elements described in Mitigation Measure AES-1, such as applying a dull finish to the power poles and replacing existing landscaping along Golden Hill Road, would help minimize visual contrast and improve the overall aesthetics. The simulation of KOP 6 (Figure 4.1-7) shows newly installed weathered (i.e., dulled finish) steel poles, which would be consistent with a dulled finish pursuant to Mitigation Measure AES-1. While the poles would dull further over time (i.e., appear more rustier, orange-brown) and a dulled finish would be used on TSPs included as part of the new 70 kV power line, the 70 kV power line and poles would still introduce large linear engineered features to the Golden Hill Road area and thus have a significant adverse effect on the visual character and moderate-to-high visual quality of views in the area of Golden Hill Road. No other feasible mitigation is available to reduce these adverse effects. (Note: undergrounding the power line is not considered mitigation and is instead being evaluated as an alternative [Alternative PLR-3] to the Proposed Project.) As a result, this impact would be **significant and unavoidable**.

In response to Comment J-113, the first bullet of Mitigation Measure AES-1, on page 4.1-43, has been revised to indicate that landscaping incorporated between Union Road and the Estrella Substation would need to comply with the standards provided in PG&E's Wildfire Safety Inspection Program and CAL FIRE's defensible space guidelines, and to delete reference to the County Fire Department. Specifically, the text has been revised as follows:

Mitigation Measure AES-1: Use Landscaping, Design and Architectural Elements to Complement the Surrounding Visual Landscape.

HWT and PG&E shall implement the following measures:

- Incorporate drought- and fire-resistant native shrubs within the hardscape landscaping proposed in APM AES-1 between Union Road and the Estrella Substation in accordance with the standards provided in PG&E's Wildfire Safety Inspection Program and CAL FIRE's defensible space guidelines. 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.

In response to Comments H-114, J-114, and BP-17, the second bullet of Mitigation Measure AES-1, on page 4.1-44, has been revised to specify the placement of fence slats along the substation's southeastern perimeter and to conform to current PG&E practices regarding fencing around substation facilities. Specifically, the text has been revised as follows:

- At the substation's southeastern perimeter fronting Union Road (where practicable), incorporate chain link fence slats or mesh fabric using natural colors that are compatible with the surrounding area (i.e., green, light brown, gray) in order to minimize visual contrast.

In response to Comment J-115, I-59, and BP-17, the third bullet of Mitigation Measure AES-1, on page 4.1-44, has been revised to clarify the requirements for a dulled finish on Proposed Project and alternative components, and to provide additional information on the types of finishes that may be used on power line poles. Specifically, the text has been revised as follows:

- For all Proposed Project and alternative components (not including the power line conductors), use ~~materials and~~ a dulled finish or paint colors that are compatible with the surrounding area (i.e., dull grey, light brown, or green colors) in order to minimize visual contrast. Examples of dulled finishes include use of galvanized steel or naturally weathered steel. 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.~~

In response to Comment J-116, the fourth bullet of Mitigation Measure AES-1, on page 4.1-44, has been deleted. Specifically, the text has been revised 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.~~

In response to Comment I-55, an additional bullet has been added to Mitigation Measure AES-1 on page 4.1-44 that requires the Applicants to replace any existing landscaping along Golden Hill Road that requires removal during construction. Specifically, the following text has been added:

- Where practicable and in accordance with CPUC G.O. 95 and other applicable laws, HWT and PG&E shall replace any existing landscaping that requires removal due to construction of the proposed 70 kV power line along the publicly accessible portions of Golden Hill Road, unless the underlying land owner specifically requests non-replacement of landscaping.

In response to Comment I-58, the text on page 4.1-45 has been revised to clarify the dulling of specular wires over time, with respect to potential light and glare impacts from the Proposed Project. Specifically, the text has been revised as follows:

The Proposed Project's 70 kV power line, or related operation and maintenance activities would not result in new, permanent sources of light or glare. As discussed

above, the specular wires associated with the power line would be shiny initially, thereby potentially resulting in a new source of glare for daytime views; However, but based on observations by PG&E and other utilities, the wires are expected to dull within one year over time such that these impacts would be considered temporary and less than significant.

In response to Comment J-118, the text on page 4.1-45 has been modified such that APM AES-2 would not apply to operation and maintenance activities. Specifically, the text has been revised as follows:

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.~~

In response to Comments H-22 and H-91, the text on page 4.1-47 has been revised to further describe the visual effects of the substation under Alternative SS-1 on the surrounding landscape. Specifically, the text has been revised as follows:

Development of the substation at the Bonel Ranch site would substantially alter the visual character and quality of public views of this immediate area and its agricultural setting due to the large scale and industrial nature of the substation facilities. Development of the substation at this site would be visually incompatible with the surrounding agrarian landscape and therefore would have a significant effect on the area's visual character and visual quality. Construction activities would also result in temporary adverse effects on public views in the area. However, because viewer concern and exposure is lower in this area (see Table 4.1-1; KOPs 11 and 12), overall, this alternative would have a less severe ~~effect on the area's visual character and visual quality~~ visual effect when compared to the Proposed Project. Implementation of **Mitigation Measure AES-1** would help reduce the visual impact of Alternative SS-1 to a less-than-significant level. As a result, impacts under significance criterion C would be **less than significant with mitigation.**

In response to Comment J-64, the text on pages 4.1-50 to 4.1-51 has been revised to describe the visual effects of both the transition stations and oak tree removal with respect to Alternative PLR-3. Specifically, the text has been revised as follows:

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.

In response to Comment H-90, the text on page 4.1-52 has been revised to describe the visual effects under Alternative SE-1A due to the new interconnection line and the required removal of oak trees and vegetation. The text has been revised as follows:

Alternative SE-1A would add additional electrical infrastructure where no development currently exists on the site including a 500-foot longer interconnection line than the Proposed Project and would require removal of oak trees and vegetation. The new substation and associated electrical infrastructure ~~and~~ would be noticeable to motorists along El Pomar Drive (e.g., from KOPs 18 and 19) and likely visible from the residence near KOP 20. Construction activities would also result in temporary adverse effects on public views in the area. Even in light of the oak tree removal work and longer interconnection line associated with Alternative SE-1A, ~~this~~ alternative site would result in less adverse effects on visual character and visual quality than the Proposed Project because the new substation would be sited adjacent to an existing substation and the area is characterized by electrical infrastructure.

In response to Comment J-119, the text on page 4.1-53 has been modified to clarify the starting point of the segment of Alternative SE-PLR-2 along South River Road. Specifically, the text has been revised as follows:

In particular, the segment along South River Road between Lothan Lane and ~~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).

Section 4.2, Agriculture and Forestry Resources³

In response to Comment J-120, the text in the notes to Table 4.2-1, on pages 4.2-4 to 4.2-5, has been revised to include a definition of Farmland of Local Potential. Specifically, the text has been revised as follows (note that Table 4.2-1 was previously revised as part of the Recirculated DEIR):

Table 4.1-1. FMMP Acreage at the Estrella Substation Site and Parcel

FMMP Category	Substation Site		Substation Parcel	
	Area (acres)	Percentage ¹	Area (acres)	Percentage ¹
Farmland of Statewide Importance	2.62	17%	2.62	13%
Unique Farmland	11.72	77%	16.26	81%
Farmland of Local Potential ²	0.62	5%	0.62	3%

³ As noted above, revisions to Section 4.2, "Agriculture and Forestry Resources" were provided as part of the recirculated DEIR. Those changes, having already been circulated for public review, are accepted in Volume 1 of this FEIR (i.e., not shown in underline/strikeout) and are not included in this chapter. Only new changes to Section 4.2, since the recirculation, are presented in this section.

FMMP Category	Substation Site		Substation Parcel	
	Area (acres)	Percentage ¹	Area (acres)	Percentage ¹
Grazing Land	0.04	<1%	0.48	2%
Total	15.17	100%	20.0	100%

Note: FMMP = Farmland Mapping and Monitoring Program

1. Due to rounding, percentages do not add up to 100 percent.

2. Farmland of Local Potential is a subcategory of Farmland of Local Importance and is defined by the San Luis Obispo County Board of Supervisors as “lands having the potential for farmland, which have Prime or Statewide characteristics and are not cultivated.”

Source: CDOC 2016b, 2016d

In response to Comments H-16, J-122, D-60, and R.C-14, the text of Mitigation Measure AG-1, on pages 4.2-14 to 4.2-15, has been revised to modify the process for compensation and provide flexibility with respect to the types of conservation easements that may be employed. Specifically, the text has been revised as follows:

Mitigation Measure AG-1: Provide Compensation for Loss of Agricultural Land.

To compensate for the loss of Farmland of Statewide Importance and Unique Farmland, HWT and PG&E shall, prior to the completion construction of the Proposed Project or alternative, construction, shall either:

- 1) eContribute sufficient funds, in an amount equal to the fair market value, based upon value prior to beginning of project construction, of the impacted Farmland of Statewide Importance and Unique Farmland, as it applies to each Applicant’s specific impacts (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program¹, 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 which will achieve similar long-term preservation of agricultural lands in San Luis Obispo County;
- 2) Enter into and record one or more conservation easements with landowners for land classified as the same or greater FMMP Important Farmland category as the land impacted and is under vineyard production at a 1:1 ratio by acreage for the impacted Farmland of Statewide Importance and Unique Farmland; or
- 3) A combination of clauses 1 and 2, above, may be implemented via a financial contribution equaling the fair market value, consistent with clause 1, or any land acreage not conserved via a conservation easement in a 1:1 ratio by acreage, consistent with clause 2.

Each Applicant may implement this mitigation measure independently or jointly for the acreage of their respective impacts. Any fair market value estimates, proposed recipients of financial contributions, and proposed conservation easements shall be

submitted to the CPUC for review and approval prior to funding and/or execution to assure fulfillment of the intent of this mitigation measure.

~~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.~~

Footnote 1: 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.

In response to Comment J-123, the text of Mitigation Measure AG-2, on page 4.2-15, has been revised 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. Additionally, in response to Comment D-371, the text has been revised to clarify the potential sources of topsoil and conditions regarding the depth of topsoil, as well as to clarify that restoration actions must be consistent with the stormwater pollution prevention plan (SWPPP) best management practices (BMPs). Finally, in response to Comment D-68, text has been added to clarify the definition of restoration of agricultural land. Specifically, the text has been revised as follows:

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 associated with their respective components 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 equivalent value agricultural crops unless the property owner requests that the material remain for their use. Topsoil may be sourced from other areas of the Proposed Project (e.g., topsoil stripped and stockpiled as part of Estrella Substation construction) or may be purchased within San Luis Obispo County. The depth of topsoil following restoration shall match the pre-project condition. The responsibility of performing these various tasks may be stipulated in an agreement between HWT, 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 ~~or and~~ PG&E shall provide just compensation for this work. HWT and PG&E shall ensure that all restoration activities pursuant to this mitigation measure, including through any agreements with

landowners, are consistent with the best management practices (BMPs) in the stormwater pollution prevention plan (SWPPP).

Restoration of agricultural land shall be defined as restored to a reasonable equivalent in agricultural viability/suitability in comparison to pre-construction conditions (i.e., soil conditions are as, or more, suitable to support the same or similar crops as pre-construction conditions), unless other arrangements with the land owner for different restoration conditions have been made. PG&E and HWT shall submit a report to CPUC after restoration efforts are completed, documenting completion of the restoration activities required by this mitigation measure.

In response to Comment J-124, the text on page 4.2-17 has been revised to clarify that the northern reasonably foreseeable distribution line segment would not be installed within the median. Specifically, the text has been revised as follows:

The northern reasonably foreseeable new distribution line segment would ~~be installed primarily within the median of~~ parallel the existing SR-46 right-of-way and would not substantially affect Important Farmland, zoning for agricultural uses, or Williamson Act contracts.

In response to Comment J-126, the text on page 4.2-21 has been revised to correct a typographical error. Specifically, the text has been revised 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 impact ~~substantial~~ agricultural land.

Section 4.3, Air Quality⁴

In response to Comment J-127, the title of Impact AQ-2 on page 4.3-16 has been revised to match significance criterion B. Specifically, the text has been revised as follows:

Impact AQ-2: 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 ~~Potential to violate ROG, NO_x, and PM₁₀~~

⁴ As noted above, revisions to Section 4.3, "Air Quality" were provided as part of the recirculated DEIR. Those changes, having already been circulated for public review, are accepted in Volume 1 of this FEIR (i.e., not shown in underline/strikeout) and are not included in this chapter. Only new changes to Section 4.3, since the recirculation, are presented in this section.

~~significance thresholds and contribute substantially to an existing or projected air quality violation~~

In response to Comment R.A-51, a footnote has been added to Mitigation Measure AQ-1 on page 4.3-23 to clarify the meaning “property line,” as referenced in the measure. Specifically, the following text has been added:

- e. Suspend grading operations when wind speeds are high enough to result in dust emission crossing the property line¹ despite application of dust mitigation measures.

Footnote 1: The property line is meant to be the edge of the work area established for the current project activities.

In response to Comment R.B-25, the first bullet of Mitigation Measure AQ-2 on page 4.3-27 has been revised to allow for consultation with public health agencies. Specifically, the text has been revised as follows:

- Prepare a VFMP. The Applicants shall prepare a VFMP and submit it to the CPUC for review and approval prior to the start of construction. Prior to submittal of the VFMP to the CPUC, the Applicants shall consult with ~~The VFMP shall be submitted to the California Department of Public Health and the San Luis Obispo Department of Public Health for review~~ guidance on all feasible mitigation measures to include in the VFMP. Feasible mitigation measures identified during this consultation shall be incorporated by the Applicants in the VFMP submitted to the CPUC ~~to CPUC for final approval prior to the start of construction.~~

In response to Comment J-131, the text on page 4.3-28 has been revised to clarify that construction and operation activities for the reasonably foreseeable distribution components would not require the use of helicopters. Specifically, the text has been revised as follows:

Construction and operation activities for the reasonably foreseeable distribution components would be similar to the Proposed Project, but on a much smaller scale and would not require the use of helicopters.

In response to Comment J-42, the text on page 4.3-33 has been revised to clarify and make consistent the length of time estimated for the construction of the entire overhead new 70 kV power line segment. Specifically, the text has been revised as follows:

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.

Based on Comments J-65 and J-230, text has been added on 4.3-33 to describe the energy consumption and associated emissions of HVAC units at the transition stations for Alternative PLR-3. Specifically, the text has been revised as follows:

Operation and maintenance of Alternative PLR-3 would involve similar number and frequency of vehicle trips compared to the Proposed Project 70 kV powerline. The transition stations at either end of the underground power line segment would include HVAC units that would consume energy when operating; however, air quality emissions associated with this energy consumption would be de minimis.

Section 4.4, Biological Resources

In response to Comment J-133, the text on pages 4.4-1 to 4.4-2 has been revised to indicate that PG&E is in the process of obtaining a permit under the Bald and Golden Eagle Protection Act. Additionally, the same passage has been revised in response to Comment J-134 to omit text discussing “take” under the Bald and Golden Eagle Protection Act. Specifically, the text has been revised 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. 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. ~~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.~~

In response to Comments H-100 and J-135, the text on page 4.4-9 has been revised to provide the applicable citation to the California Fish and Game Code. Specifically, the text has been revised 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 under California Fish and Game Code Section 3503 et seq. in California.

In response to Comment D-334, text has been added to Table 4.4-1 on page 4.4-17 to describe the 2016 site assessment that was conducted for California red-legged frog (CRLF). The revised text is shown on the following pages.

In response to Comment D-21, text has been added to Table 4.4-1 on page 4.4-20 to describe the surveys of golden eagle nests conducted by Garcia and Associates (GANDA). The revised text is shown on the following pages.

Additionally, in response to Comment D-25, the text in Table 4.4-1 on page 4.4-20 has been revised to include the most recent sightings of golden eagles, as provided in eBird. The revised text is shown on the following pages.

In response to Comment J-136, great blue heron has been removed from the Table 4.4-1 on page 4.4-21. The revised text is shown on the following pages.

In response to Comment J-137, Figure 4.4-1 on page 4.4-30 has been revised to label the Salinas River and Dry Creek. The revised figure is shown on the following pages.

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Common and Scientific Name	Legal Status Federal / State / CNPS	Description and Habitat	Potential to Occur	Explanation / Discussion ¹
California red-legged frog (CRLF) <i>Rana draytonii</i>	FT/SSC/--	Medium-sized frog with prominent dorsolateral folds extending along the side of the body. Occurs in semi-permanent or permanent water at least 1.6 feet deep, bordered by emergent or riparian vegetation, and upland grassland, forest, or scrub habitats for refugia and dispersal.	Possible (PP, RFDC, SS-1, PLR-1A, PLR-1C, PLR-3, SE-1A, SE-PLR-2, BS-2)	The Salinas River and some isolated ponds in the area provide suitable breeding habitat, while Huer Huero Creek, Estrella River, and other waterbodies provide suitable movement habitat. The nearest known breeding population of CRLF is located approximately 6 miles south of the Proposed Project in Graves Creek. Three CNDDDB occurrences have been recorded within 5 miles of the Proposed Project, reasonably foreseeable distribution components, and alternatives. <u>A site assessment for CRLF was conducted in November 2016, as described in Appendix Q to the PEA (NEET West and PG&E 2017), during which no CRLF individuals were identified but suitable habitat was documented. Additionally, n</u> No CRLF individuals were observed during surveys in 2019 (Horizon 2019b).

Common and Scientific Name	Legal Status Federal / State / CNPS	Description and Habitat	Potential to Occur	Explanation / Discussion ¹
golden eagle <i>Aquila chrysaetos</i>	MBTA/FP, WL/--	Large dark brown eagle with a golden sheen on the back of the head and neck. Requires broad expanses of open country for hunting. Nests primarily in rugged mountainous areas with large trees or on cliffs (and sometimes in wetland, riparian and estuarine habitats).	Present (PP, RFDC, SS-1, PLR-1A, PLR-1C, PLR-3, SE-1A, SE-PLR-2, BS-2)	Multiple active and inactive nests have been identified in the vicinity, including one near the Cava Robles RV Resort and several in the vicinity of the Alternative SE-PLR-2 alignment. Known golden eagle nests are shown in Error! Reference source not found. Expansive grasslands and open oak woodlands within and around the Proposed Project, reasonably foreseeable distribution components, and alternatives areas provide suitable hunting and nesting habitat for this species. Multiple sightings of golden eagles have been recorded within Paso Robles city limits between 1982 and 2015 <u>2020</u> , with the closest observation to the project site being at Cuesta College North Campus just north of SR 46 (eBird 2020b) and at Barney Schwartz Park (eBird <u>2021</u>). Horizon biologists also observed golden eagle individuals during March and July 2019 surveys (Horizon 2019a, 2019c). <u>Garcia and Associates (GANDA) biologists observed golden eagle nests and individuals during February, May, and June 2020 surveys (GANDA 2020).</u>

Common and Scientific Name	Legal Status Federal / State / CNPS	Description and Habitat	Potential to Occur	Explanation / Discussion ¹
<p>great blue heron <i>Ardea herodias</i></p>	<p>MBTA / /</p>	<p>Large and lanky bird that forages in freshwater, brackish, and marine wetlands, as well as in flooded agricultural fields. Nests in colonies in trees located adjacent to waterbodies, rivers, estuaries, and marshes.</p>	<p>Possible (PP, SS-1, PLR-1A, PLR-1C, PLR-3, SE-1A, SE-PLR-2, BS-2)</p>	<p>Suitable nesting habitat is present in riparian woodlands and trees near perennial waterbodies that occur in the area. No CNDDDB occurrences exist within 5 miles of the Proposed Project and alternatives; however, this species was observed near the Salinas River in 2019 and is known to occur in the region.</p>

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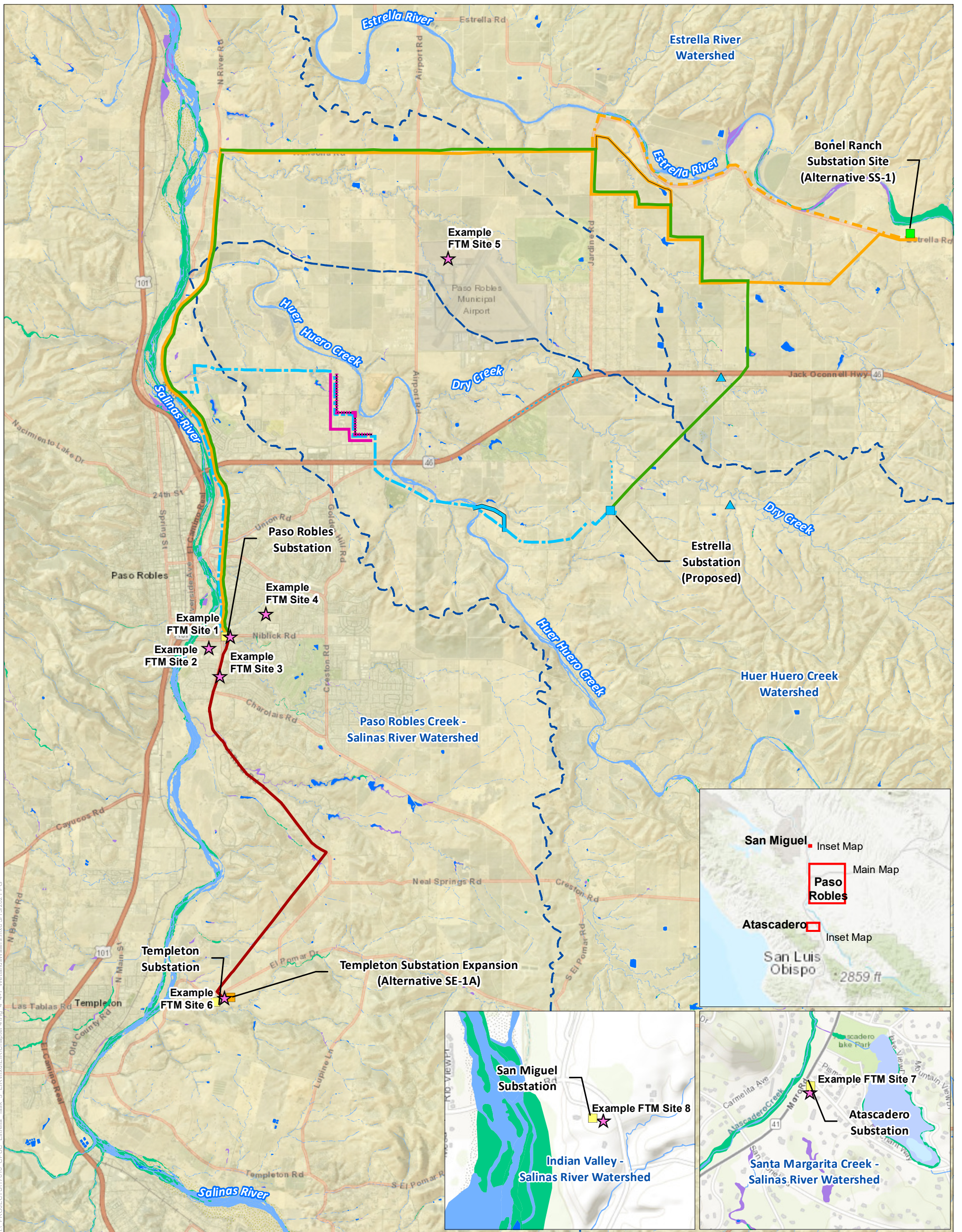
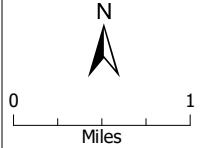


Figure 4.4.1
Waters and Wetlands

- | Proposed Project | Project Alternatives | Surface Water Features |
|---|--|--|
| ■ Estrella Substation | ★ Front-of-the-Meter (FTM) Battery Storage Sites (Alternative BS-2) | - - - HUC 10 Watershed Boundary |
| - - - 70kV Route | ■ Alternative SS-1: Bonel Ranch Substation Site | ■ Freshwater Emergent Wetland |
| — 70 kV Minor Route Variation 1 | ■ Alternative SE-1A: Templeton Substation Expansion - 230/70 kV Substation | ■ Freshwater Forested/Shrub Wetland |
| Reasonably Foreseeable Distribution Components | — Alternative PLR-1A: Estrella Route to Estrella Substation | ■ Freshwater Pond |
| - - - New Distribution Line Segments | — Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1 | ■ Lake |
| ▲ Additional 21/12 kV Pad-Mounted Transformer | - - - Alternative PLR-1C: Minor Route Variation 1 | ■ Riverine |
| Existing Infrastructure | - - - Alternative PLR-1C: Minor Route Variation 2 | |
| ■ Existing Substations | — Alternative PLR-3A: Strategic Undergrounding, Option 1 | |
| | — Alternative PLR-3B: Strategic Undergrounding, Option 2 | |
| | — Alternative SE-PLR-2: Templeton-Paso South River Road Route | |

Source: ESRI 2018, PG&E 2019, USGS NHD 2020, USFWS NWI 2020

Note: The route variations shown are offset and simplified in order to display the alignments of the alternative routes that may overlap in places



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In response to Comment J-138, the text on page 4.4-41 has been revised to include a discussion of PG&E's Multi-Region Habitat Conservation Plan (HCP). Specifically, the text has been revised as follows:

~~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. 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 additional equipment within Estrella Substation at ultimate buildout.~~

In response to Comment J-139, the text on page 4.4-42 has been revised to state that PG&E's Multi-Region Habitat Conservation Plan (HCP) would apply to reasonably foreseeable distribution components and ultimate substation buildout. Specifically, the text has been revised as follows:

~~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. 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 EIR and will need to be evaluated in the future for potential coverage under PG&E's Multi-Region HCP.~~

In response to Comment D-86, the text on page 4.4-43 has been revised to describe the potential for introduction of nonnative invasive plant species that have been brought in from project vehicles and equipment. Specifically, the text has been revised as follows:

~~Additionally, indirect effects to these species may result from soil compaction, fugitive dust generation, erosion, and accidental releases of toxic substances, and the introduction of nonnative invasive plant species into newly constructed areas that have been brought in from project vehicles and equipment.~~

In response to Comment D-86, the text on page 4.4-44 has been revised to indicate that construction BMPs that would be implemented as part of the SWPPP would including vehicle

cleaning, which would serve to prevent the spread of nonnative invasive plant species. Specifically, the text has been revised as follows:

The SWPPP would include BMPs to prevent erosion and protect water quality, including measures that minimize impacts from fugitive dust (APM AIR-3 also would minimize fugitive dust generation), as well as vehicle cleaning which will minimize the potential spread of nonnative invasive plant species.

In response to Comment H-101 and J-141, the text on page 4.4-45 has been revised to exclude text requiring notification of CDFW if a Crotch's bumble bee is found. Specifically, the text has been revised as follows:

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.

In response to Comment D-84, the text on page 4.4-45 has been revised to clarify that exclusion fencing around construction areas would not be required by APM BIO-3 or Mitigation Measure BIO-1, and to clarify the avoidance of CRLF and western spadefoot toad. Specifically, the text has been revised as follows:

Likewise, monitoring of initial ground-disturbing activities under APM BIO-3 and Mitigation Measure BIO-1 (through pre-construction surveys, biological monitoring, and the monitor's stop-work authority, ~~and exclusion fencing~~) would reduce potential impacts to ensure that CRLF and western spadefoot toad individuals are not present during these activities, such that they could be directly impacted.

In response to Comment H-120 and J-144, the text on page 4.4-47 has been revised to state that only surveys for golden eagles should commence on January 15 and surveys for all other birds should commence on February 1. Specifically, the text has been revised as follows:

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).

In response to Comment D-325, text has been added on page 4.4-47 to indicate that the process for implementing the MRV is described under Mitigation Measure BIO-3. Specifically, the following text has been added:

If this potential nest is determined to be occupied prior to construction, the Applicants would utilize the MRV to avoid potential impacts to the nest from constructing the new power line in close proximity. The process for implementation of the MRV is described in Mitigation Measure BIO-3.

In response to Comment J-145, the text on page 4.4-48 has been revised to omit coordination with CDFW if a bat roost or bat individual is found. Specifically, the text has been revised as follows:

If any such roosts or bat individuals were identified, the Applicants would be required to notify ~~and coordinate with~~ CDFW.

In response to Comment J-146, the text of subsection a. in Mitigation Measure BIO-1, on page 4.4-49, has been revised 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. Specifically, the text has been revised as follows:

- a. **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 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (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~~ CPUC-approved qualified botanist to identify plants.

In response to Comment J-147, the text of subsection b. in Mitigation Measure BIO-1, on page 4.4-49, has been revised to state that a CPUC-approved biologist(s) shall be retained to conduct pre-construction surveys, rather than a USFWS- and CDFW-approved biologist(s). Specifically, the text has been revised as follows:

- b. **Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species:** HWT/PG&E shall retain a ~~CPUC, USFWS, and CDFW~~ CPUC-approved biologist(s) to conduct pre-construction surveys for special-status plants and wildlife prior to initial vegetation clearance, grubbing, and ground-disturbing activities.

In response to Comment J-148, the text of subsection b. in Mitigation Measure BIO-1, on page 4.4-49, has been revised to clarify that pre-construction surveys shall be conducted within the work areas, and to state that CPUC shall not be required to review and approve the preconstruction survey report prior to the start of construction. Additionally, in response to Comment D-334, text has been added to this passage to require special survey techniques for burrowing owl, Swainson's hawk, and white-tailed kite. Further, in response to Comment H-101, text has been added to clarify the pre-construction survey requirements for Crotch's bumble bee. Specifically, the text has been revised as follows:

The pre-construction surveys shall be conducted no earlier than 30 days prior to surface disturbance within the work areas. The pre-construction surveys shall

incorporate specialized techniques for burrowing owl in accordance with CDFW's 2012 Staff Report on Burrowing Owl Mitigation in areas identified as having suitable habitat for burrowing owl. Additionally, HWT and PG&E shall conduct pre-construction surveys for Swainson's hawks and white-tailed kite based on the Swainson's Hawk Technical Advisory Committee's 2000 Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. Pre-construction surveys for Crotch's bumble bee shall be conducted during the flying season. 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.

In response to Comment D-337, the text of subsection b. in Mitigation Measure BIO-1, on page 4.4-50, has been revised to provide clarification regarding "sensitive habitat areas". Additionally, in response to Comment J-149, the same passage has been revised to specify the distance to wetlands and waters of the U.S. within which increased monitoring requirements would apply. Specifically, the text has been revised as follows:

Areas identified as Sensitive habitat areas in the pre-construction survey report, 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. Habitat areas will be considered sensitive if there are special-status species present, or potentially present, in an area that needs to be avoided in order to prevent disturbance or harm to the 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; however, work ~~near~~ within 50 feet of wetlands and waters of the U.S. will be monitored by a biological monitor over its duration.

In response to Comment J-151, the text of subsection b. in Mitigation Measure BIO-1, on page 4.4-50, has been revised to state that a CPUC-approved biologist, rather than a USFWS- and CDFW-approved biologist, shall flag boundaries of habitat to be avoided. Specifically, the text has been revised as follows:

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.

In response to Comment J-152, the text of subsection b. in Mitigation Measure BIO-1, on page 4.4-50, has been revised 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. Specifically, the text has been revised as follows:

The ~~USFWS and CDFW~~ CPUC-approved biologist shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats.

In response to Comments H-119 and J-153, the text of subsection b. in Mitigation Measure BIO-1, on page 4.4-50 to 4.4-51, has been revised to omit the placement of gravel bags since gravel bags and erosion and sediment controls would be implemented per the SWPPP and do not need to be mentioned in this section. Additional language has been added to clarify the role of the BMPs implemented as part of the SWPPP. Specifically, the text has been revised as follows:

~~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 protection BMPs. Erosion and sediment control BMPs shall be included in the SWPPP for the Proposed Project or alternative and shall be fully implemented during construction. These BMPs shall effectively minimize any erosion or sedimentation into nearby wetlands and/or waters of the U.S., and shall be removed upon the completion of construction.

In response to Comment H-118, the text of subsection b. in Mitigation Measure BIO-1, on page 4.4-51, has been revised to state that weekly biological construction monitoring reports shall be prepared and submitted to the CPUC and not the appropriate permitting and responsible agencies. Specifically, the text has been revised as follows:

Weekly biological construction monitoring reports shall be prepared and submitted to the CPUC ~~appropriate permitting and responsible agencies~~ throughout the duration of the ground-disturbing and vegetation-removal construction phase.

In response to Comment J-154, the text of subsection b. in Mitigation Measure BIO-1, on page 4.4-51, has been revised 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. Specifically, the text has been revised 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.

In response to Comments H-117 and J-155, the text of subsection c. in Mitigation Measure BIO-1, on page 4.4-51, has been revised to state that only uncovered steep trenches and excavation will be inspected during construction twice daily. Specifically, the text has been revised as follows:

- c. **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

uncovered steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment.

In response to Comment J-271, the text of subsection c. in Mitigation Measure BIO-1, on page 4.4-51, has been revised to state that if the placement of earthen ramps in excavations is not feasible, then wood planks or escape ramps may be placed in the excavations to allow wildlife an escape route. Additionally, in response to Comment D-340, text has been added to the same passage (continuing on to page 4.4-51) to require that all open-ended project-related pipes will be capped or inspected for the protection of wildlife. Specifically, the text has been revised as follows:

Excavations shall provide an earthen ramp (where feasible) and, if not, wood planks or escape ramps to allow for a wildlife escape route. All open-ended project-related pipes (not dependent on diameter size) will be capped if left overnight or inspected for wildlife prior to being moved.

In response to Comment J-156, the text of subsection d. in Mitigation Measure BIO-1, on page 4.4-51, has been revised to clarify that the nesting bird season commences on January 15 for golden eagles and February 1 for all other birds. Specifically, the text has been revised as follows:

- f. **Nesting Birds:** 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 ~~revised to be January 15~~ through August 31.

In response to Comment J-157, the text of subsection e. in Mitigation Measure BIO-1, on page 4.4-52, has been revised to clarify that work in the immediate vicinity must stop if a kit fox is discovered and photos taken as feasible. Additionally, revisions have been made to omit the text stating that appropriate federal and state permits must be obtained before the project can proceed if a kit fox is discovered; however, consultation with and authorization from USFWS and/or CDFW would still be required before work can resume. Specifically, the text has been revised 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.~~ 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.

In response to Comment J-158, the text of Mitigation Measure BIO-2, on page 4.4-52, has been revised to limit CDFW's approval authority. Additionally, in response to Comment D-342, the first and second bullets of Mitigation Measure BIO-2 have been revised to clarify the success criteria for annual plant species and that invasive weeds will be monitored at the receiver site and not on the project site. Specifically, the text has been revised as follows:

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 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:

- A surveyed plant population size count ~~roughly~~ equal to or greater than the number of individuals transplanted or number of individuals removed (this total may include ~~both~~ transplanted individuals that have survived, seeds that have grown into plants and have survived, as well as any additional supplemental plantings following the initial transplantation and seed dispersal that have survived at least two growing seasons), and
- Less than 5 percent cover of invasive weeds (or equivalent cover as compared with adjacent areas) within the ~~restoration area~~ receiver site.

In response to Comment J-159, the text on page 4.4-53 has been revised to indicate that PG&E would implement its existing Avian Protection Plan. Specifically, the following text has been added:

Additionally, the Applicants would implement PG&E's 2018 Avian Protection Plan, which incorporates relevant raptor-safe construction guidelines found in APLIC's and USFWS's 2005 Avian Protection Plan Guidelines (refer to Appendix D) ~~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.~~

In response to Comment J-160, the text on page 4.4-53 has been revised to clarify the requirements of Mitigation Measure BIO-3. Specifically, the text has been revised as follows:

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.~~

In response to Comments J-67, J-81, J-82, J-83, J-84, J-161 and J-162, the text of Mitigation Measure BIO-3, on page 4.4-54, has been revised to indicate that HWT would not be subject to these requirements and that PG&E would implement its existing Avian Protection Plan. Additionally, revisions are made to clarify that transmission components would need to meet applicable APLIC recommendations. The text has been revised as follows:

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 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). 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 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.~~

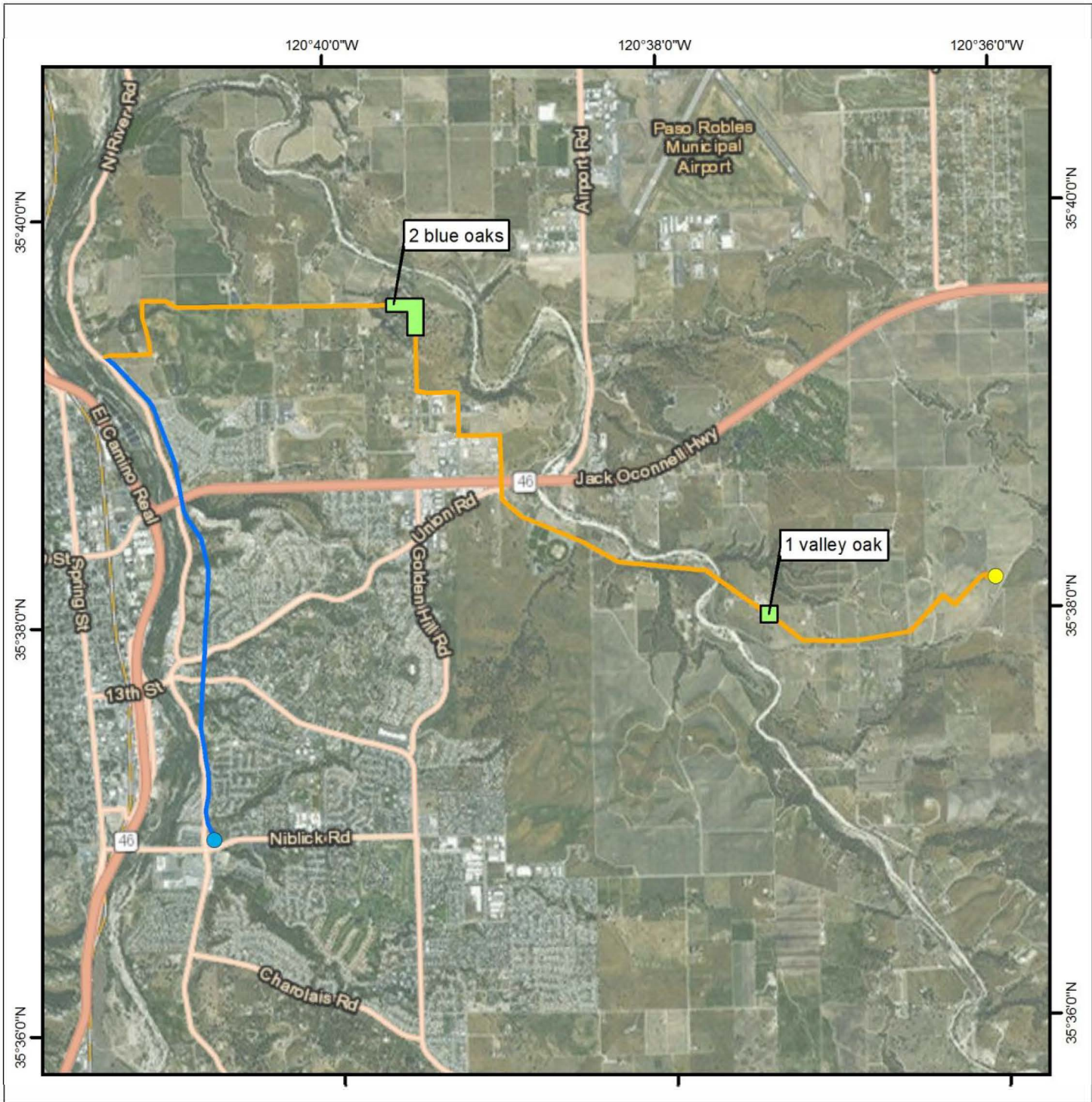
In response to Comments H-122, J-85, J-86, J-163, and J-164, the text of Mitigation Measure BIO-3, on page 4.4-54, has been revised to (1) delete a typographical error with respect to “operational construction”; (2) clarify that the nesting bird season begins on January 15 for golden eagle and February 1 for all other birds, and (3) state that a no-disturbance buffer around nests will be established in accordance with PG&E's *Nesting Birds: Specific Buffers for PG&E Activities*, and that the biologist shall inform the CPUC, not CDFW or USFWS, regarding buffer reductions and nest monitoring or as directed in regulatory agency permits. The text has been revised 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. If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive- 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. If ~~operational~~ construction activities must occur within this buffer, the biologist shall inform the CPUC coordinate with CDFW and, as necessary, USFWS to determine of any buffer reductions and/or nest monitoring to avoid impacts to active nests, and will coordinate with CDFW and USFWS if stated to do so in the project's regulatory permits.

In response to Comment D-325, text has been added to Mitigation Measure BIO-3, on page 4.4-54, to clarify the process for implementing the Minor Route Variation (MRV) that is described in the Project Description. Specifically, the following text has been added:

PG&E shall implement an MRV (as shown in Figure 2-8 on page 2-41 in Volume 1 of this FEIR) to avoid a potential golden eagle nest along Huer Huero Creek at Union Road if this nest is determined to be occupied or is expected to be used by golden eagles in future nesting seasons (based on prior observations and the species' nest site fidelity). The MRV shall be implemented unless PG&E can demonstrate, to the satisfaction of the CPUC, that the nest in question is not occupied by golden eagles and likely will not be used in future nesting seasons.

In response to Comment D-75, a figure has been added on page 4.4-56 to show the locations of tree removal for the Proposed Project construction. The new figure is shown on the following page.



Basemap Source: Esri World Imagery

Legend

- Potential Oak Tree Removal Locations
- Project Area**
- New 70 kV Power Line Segment
- Reconductoring Segment
- Estrella Substation (New)
- Paso Robles Substation (Existing)

Source: NEET West and PG&E 2017

Note: Total number of oak tree removals will be determined after final engineering is complete.

Figure 4.4-6

Potential Oak Tree Removal Locations Map



In response to Comment D-313, the text on page 4.4-57 has been revised to further describe the temporary impacts to blue oak woodlands as a result of construction activities. Specifically, the text has been revised as follows:

Further, approximately 6.41 acres of blue oak woodlands would be temporarily affected from construction activities as a result of project vehicles traveling within construction work areas (including access routes), from the staging of project equipment and/or vehicles traversing work areas, pull sites, and vegetation/plant trimming activities before and after construction.

In response to Comment J-165, the text of Mitigation Measure BIO-4, on page 4.4-57, has been revised to clarify that revegetation will be conducted with site-appropriate native species that are compatible with the facility (e.g., woody plantings would not be permitted along the underground corridor for Alternative PLR-3). Specifically, the text has been revised as follows:

For any temporary impact, all disturbed soils and new fill in this habitat shall be revegetated with site-appropriate native species compatible with the facility.

In response to Comment D-313, text has been added to Mitigation Measure BIO-4, on pages 4.4-57 to 4.4-58, to describe the tree protection measures that would need to be implemented and to clarify the reporting requirements for any damage to an oak tree that may occur during construction activities. Specifically, the text has been revised as follows:

Oak trees in construction work areas shall be safeguarded by implementing the conditions stated in the City of Paso Robles's Oak Tree Ordinance, Section 10.01.090. This includes documentation of any damages to oak trees, and tree protection fences that will be installed to prevent compaction and injury to a tree's surface roots. For any damage to an oak tree that may occur during construction activities, the Proposed Project Applicants shall immediately report such incidents to the CPUC, in addition to any reporting to the City that may be done pursuant to Section 10.01.090. The Applicants shall be response for correcting any damage to the oak trees.

In response to Comment J-282, text of Mitigation Measure BIO-4, on page 4.4-58, has been revised to permit 75 percent survival of woody plantings after 3 years as acceptable success criteria, and clarify that use of a conservation bank is also acceptable. Specifically, the text has been revised as follows:

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), or at a conservation bank with a service area that covers the Proposed Project or selected alternative.

In response to Comment D-15, the text on page 4.4-58 has been revised to clarify the circumstances in which trimming of vegetation would occur. Specifically, the text has been revised as follows:

As such, mature vegetation that grows within 10 horizontal feet of any conductor within the easement would be trimmed, if that vegetation has a mature height of 15 feet or greater.

In response to Comment J-167, the text on page 4.4-58 has been revised to reflect that APMs do not apply to operation and maintenance activities; thus, standard BMPs would be implemented for management of hazardous materials. Specifically, the text has been revised as follows:

Implementation of ~~APM HAZ-1~~ standard BMPs would prevent the introduction of hazardous materials into natural communities, which could result in the loss or degradation of these communities, and would reduce these potential impacts to a less than significant level.

In response to Comment J-169, the text on page 4.4-62 has been revised to clarify that the northern reasonably foreseeable distribution line segment would parallel the existing SR 46 rather than be installed within the median of SR 46. Specifically, the text has been revised as follows:

Although the northern reasonably foreseeable distribution line segment would cross Dry Creek, the distribution line would ~~be installed within the median of~~ parallel the existing SR 46 right-of-way (which crosses over Dry Creek via a bridge/culvert) and would not directly impact these waters or adjacent habitat.

In response to Comment J-139, 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 PG&E's Multi-Region HCP. Specifically, the following text has been added:

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.

In response to Comment J-173, the text on page 4.4-64 has been revised to clarify the nature of potential impacts to special-status birds from the 230 kV interconnection as part of Alternative SS-1. Specifically, the text on has been revised 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 regarding collision, and also 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. Overall, impacts under significance criterion A would be **less than significant with mitigation**.

In response to Comment J-170, text has been added on page 4.4-66 to describe potential effects on riparian habitat from Alternative PLR-1A under significance criterion b. Specifically, the following text has been added:

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.

In response to Comment J-174, the text on page 4.4-67 has been revised to clarify that nesting birds are not typically considered special-status species. Specifically, the text has been revised 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 as well as nesting birds, which may use the Estrella River corridor.

In response to Comment J-171, text has been added on page 4.4-68 to describe potential effects on riparian habitat from Alternative PLR-1C under significance criterion b. Specifically, the following text has been added:

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.

In response to Comment J-172, text on page 4.4-70 has been revised to discuss the increased potential for wildlife entrapment under Alternative PLR-3. Specifically, the text has been revised as follows:

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.

In response to Comment J-176, text has been added on page 4.4-70 to discuss potential indirect effects to riparian habitat associated with Alternative PLR-3 under significance criterion b. Specifically, the following text has been added:

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.

In response to Comments J-67 and J-175, the text on pages 4.4-70 to 4.4-71 has been revised to (1) state that blue oak woodland provides foraging habitat for special-status raptors; (2) clarify the number of oak trees that would be removed under Alternative PLR-3, and (3) that off-site mitigation will be implemented instead of on-site replacement of the trees. Specifically, the text has been revised as follows:

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 ~~replacement~~ off-site mitigation 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. As a result, impacts under significance criterion B would be **less than significant with mitigation**.

In response to Comment J-177, the text on page 4.4-71 has been revised to clarify that undergrounding of the 70 kV line under Alternative PLR-3 would not completely avoid impacts on special-status birds due to the above-ground electrified components at the transition stations. Specifically, the text has been revised 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.

In response to Comment J-182, text on page 4.4-72 has been revised to clarify the nature of potential impacts to special-status birds from the 230 kV interconnection under Alternative SS-1. Specifically, the text has been revised 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 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. Overall, impacts under significance criterion A would be **less than significant with mitigation**.

In response to Comment J-178, text has been added to pages 4.4-72 to 4.4-73 to discuss the potential indirect effects to riparian habitat associated with Alternative SE-1A under significance criterion B. Specifically, the following text has been added:

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.

In response to Comment J-183, text has been added to page 4.4-74 to clarify the elevated risks to golden eagles due to known nests in proximity to the Alternative SE-PLR-2 route. Specifically, the following text has been added:

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, and the higher presence of juvenile eagles. In particular, young birds may be more susceptible to electrocution because they are inexperienced and less agile at taking off and landing on poles (APLIC 2018).

In response to Comment J-179, text has been added to pages 4.4-74 to 4.4-75 to discuss the potential indirect effects to riparian habitat associated with Alternative SE-PLR-2 under significance criterion B. Specifically, the following text has been added:

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.

Section 4.5, Cultural Resources

In response to Comment J-185, text has been added to subsection 4.5.1, "Introduction," on page 4.5-1, to clarify the focus of the section and to direct readers to Section 4.18, "Tribal Cultural Resources." Specifically, the following text has been added:

Although this section generally discusses cultural resources, it is primarily focused on archaeological and built environment resources. Tribal cultural resources (TCRs), which can include archaeology and built environment, are discussed in Section 4.18.

In response to Comment J-188, text has been added to the discussion of the California Register of Historical Resources. Additionally, this discussion has been moved to precede the discussion of unique archaeological resources. The following text was added and the entire discussion was moved to pages 4.5-1 to 4.5-2:

California Register of Historical Resources

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 *historical resources*. The criteria for listing in the CRHR include resources that:

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; or
4. Have yielded, or may be likely to yield, information important in prehistory or history.

California Code of Regulations (CCR) Title 14 Section 4852 also sets forth the criteria for eligibility as well as guidelines for assessing historical integrity and resources that have special considerations. This CCR defines a historical resource 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...”

Under PRC 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.” PRC Section 21084.1 defines a historical resource.

In response to Comment J-186, the text on page 4.5-2 has been revised to highlight the discussion of unique archaeological resources. Specifically, the text has been revised as follows:

Unique Archaeological Resources California Environmental Quality Act

In addition to the protection of Historical 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:

- 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.

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.

In response to Comment J-187, text has been added on page 4.5-2 regarding notification of the most likely descendant and treatment of discovered human remains. The following text has been added to the discussion of California Health and Safety Code Section 7050.5:

California Health and Safety Code Section 7050.5

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 PRC Section 5097.98, the NAHC will determine the most likely descendants and notify them of the discovery. As per Section 5097.98 (a-b), the landowner will confer with the most likely descendant to determine appropriate treatment of the human remains.

In response to Comment J-191, the text on page 4.5-8 has been revised to add information regarding the depth of Holocene deposit. Specifically, the text has been revised as follows:

This is due to the fact that these landforms date to, or post-date, the period of human occupation in the region, and due to the active nature of sedimentary deposition in these settings. 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).

In response to Comment J-189, the text on page 4.5-9 has been revised to correct the height of the cedar utility pole at Site 36052-S-001. Specifically, the text has been revised as follows:

The cedar utility pole is located 9 feet southwest of the well and is about 256 feet tall.

In response to Comment J-190, text has been added to pages 4.5-14 to 4.5-15 under the discussion of Impact CR-1 to emphasize the use of the Proposed Project area by Native American tribes. Specifically, the following text has been added:

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 ~~cultural resources~~ TCRs. 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.

In response to Comment J-191, the text on page 4.5-15 has been revised to clarify the depth of Holocene deposits and the potential for impacts. Specifically, the text has been revised as follows:

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 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.

In response to Comment J-192, the text of Mitigation Measure CR-1, on page 4.5-17, has been revised. Specifically, the text has been revised as follows:

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 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.~~

In response to Comment J-193, text has been removed from Mitigation Measure CR-1, on page 4.5-17, since it is redundant with requirements already in APM CUL-1. Specifically, the following text has been removed:

- ~~b.a. 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.~~

In response to Comment J-194, the text of Mitigation Measure CR-1, on page 4.5-17, has been revised to clarify the role of the Project proponent with respect to coordinating tribal monitors. Specifically, the text has been revised as follows:

A Native American representative from a ~~consulting~~ tribe identified by the CPUC shall be retained to monitor the construction activities if the resource is a Native American archaeological site that will be encroached upon. 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. If an archaeological resource will be directly impacted, a detailed archaeological treatment plan shall be developed and implemented by the Project proponent's cultural resources principal investigator, as defined in APM CUL-1.

In response to Comment J-196, text has been added to Mitigation Measure CR-1, on page 4.5-18, to specify procedures regarding the assessment of significance and treatment of discovered cultural resources. Specifically, the following text has been added:

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).

In response to Comment J-197, the text of Mitigation Measure CR-1, on pages 4.5-18 to 4.5-19, has been revised to clarify procedures surrounding treatment methods documented in a technical report for discovered cultural resources. Specifically, the text has been revised 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. 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. 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.

In response to Comment J-198, the text on page 4.5-19 has been revised to clarify the potential for discovery of human remains in excavations through Holocene deposits. Specifically, the text has been revised 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 through Holocene deposits for pole and tower foundations.

In response to Comment J-199, text has been added on page 4.5-19 to clarify the options available to the most likely descendant, should human remains be discovered during construction. Specifically, the following text has been added:

The most likely descendant would then inspect the site within 48 hours of notification and may recommend measures that they feel are appropriate, potentially including scientific removal and nondestructive analysis of the human remains and any items associated with Native American burials.

In response to Comment J-201, text has been added to Mitigation Measure CR-2, on page 4.5-20, to further describe the responsibilities of the most likely descendant. Specifically, the following text has been added:

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. 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.

In response to Comment J-202, text has been added to Mitigation Measure CR-2, on page 4.5-20, to clarify the process for recommencing work after treatment of discovered human remains. Specifically, the following text has been added:

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.~~

In response to Comment J-203, text has been added to Mitigation Measure CR-3, on page 4.5-22, to describe timelines for CPUC to comment on or concur with the findings of technical reports. Specifically, the following text has been added:

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.

In response to Comment J-204, text has been added to Mitigation Measure CR-3, on page 4.5-22, to provide more specificity regarding the archaeological pedestrian survey. Specifically, the following text has been added:

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

In response to Comment J-205, text has been added to Mitigation Measure CR-3, on pages 4.5-22 to 4.5-23, to describe timelines for CPUC to comment on or concur with the findings of treatment plans for human remains and the data recovery plans for eligible archaeological sites. Specifically, the following text has been added:

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.

In response to Comment J-206, text has been added to Mitigation Measure CR-3, on page 4.5-23, to be consistent with Mitigation Measure TCR-1. Specifically, the following text has been added:

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). 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).

In response to Comment J-207, text has been added on page 4.5-24 to emphasize the sensitivity of the Estrella River for archaeological remains with respect to Alternative SS-1. Specifically, the following text has been added:

Construction of Alternative SS-1 would have similar (or slightly elevated) potential to encounter buried human remains compared to the proposed Estrella Substation. The potential would be slightly elevated under Alternative SS-1 due to the site's location close to the Estrella River, which both general archaeological practice and the advice of Native American tribes in the area have indicated is sensitive for cultural resources.

In response to Comment J-208, the text on page 4.5-25 has been revised to delete an assertion regarding the need to perform a pedestrian archaeological survey for Alternative PLR-1A. Specifically, the text has been revised as follows:

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.~~

In response to Comment J-209, the text on page 4.5-25 has been revised to clarify that impacts to cultural resources may not be significant for Alternative PLR-1C. Specifically, the text has been revised 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~~ may result in significant impacts absent implementation of mitigation measures.

In response to Comment J-210, the text on page 4.5-27 has been revised to clarify the role of HWT versus PG&E in implementing APM CUL-4 for Alternative SE-1A. Specifically, the text has been revised as follows:

Implementation of 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, but would not ensure that such impacts would be reduced to a less than significant level.

In response to Comment J-211, the text on page 4.5-28 has been revised to clarify the sensitivity of the Santa Ysabel Ranch area with respect to tribal cultural resources for Alternative SE-PLR-2. Specifically, the text has been revised as follows:

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.

Section 4.6, Energy

Based on Comments J-65 and J-230, text has been added on 4.6-9 to describe the energy consumption of HVAC units at the transition stations for Alternative PLR-3. Specifically, the text has been revised as follows:

The power line under Alternative PLR-3 would be operated remotely and fossil fuel use would be limited to vehicles and equipment involved in periodic inspections, maintenance, and repairs, which would not be significant. The transition stations at either end of the underground power line segment would include HVAC units that would consume energy when operating; however, this energy consumption would be de minimis. Therefore, impacts under significance criterion A would be **less than significant.**

Section 4.7, Geology, Soils, Seismicity, and Paleontological Resources

In response to Comment J-212, the text on page 4.7-2 has been revised to correct the current year of the International Building Code. Specifically, the text has been revised as follows:

The ~~2012~~ 2018 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.

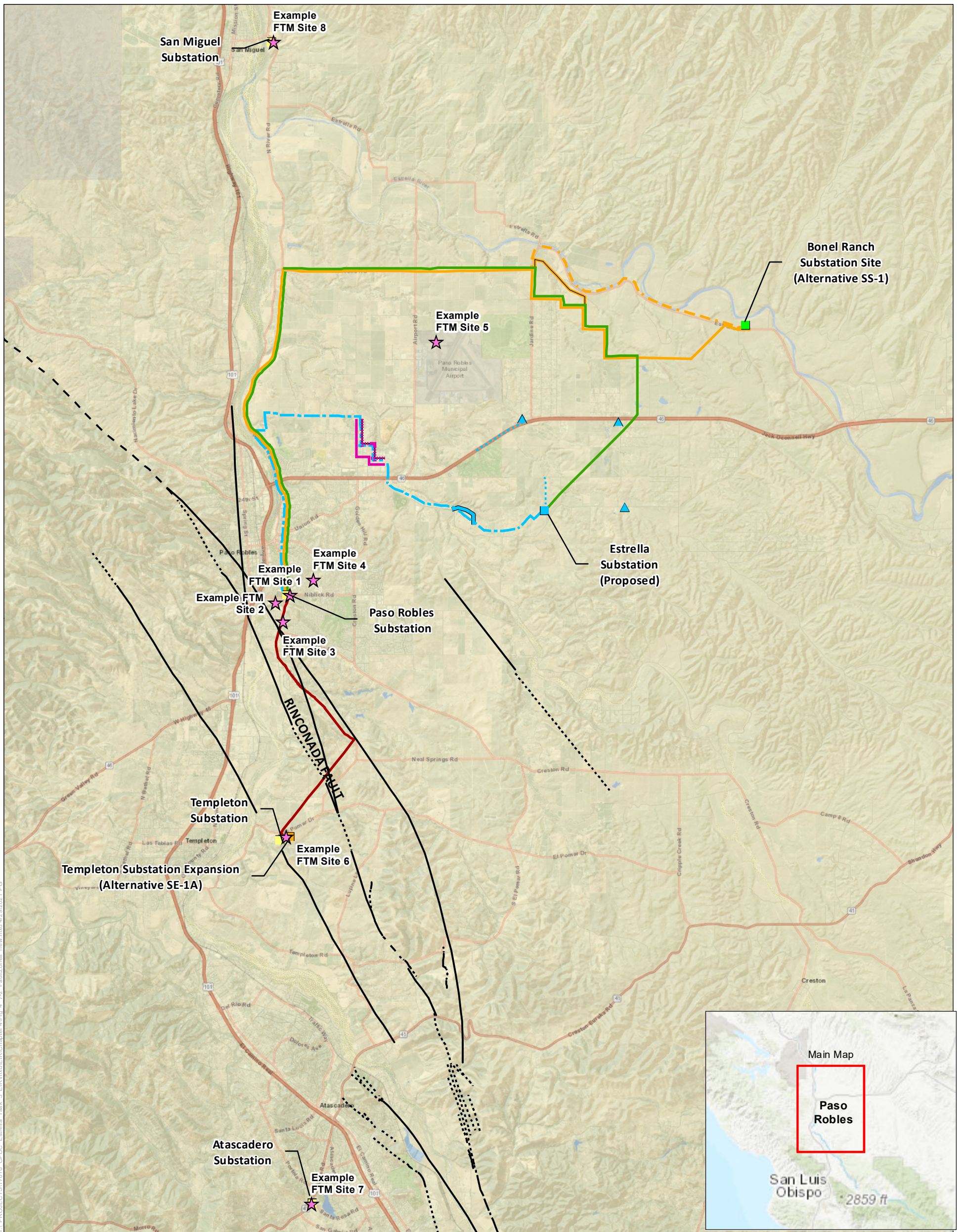
In response to Comment J-213, text has been added on pages 4.7-3 to 4.7-4 to describe the CEQA, as it relates to paleontological resources. Specifically, the following text has been added, following the discussion of Public Resources Code Section 5097.5:

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 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.

In response to Comment L-16, Figure 4.7-2 on page 4.7-15 has been revised to reflect additional branches of the Rinconada Fault. The existing figure has been replaced with a revised version shown on the following pages.



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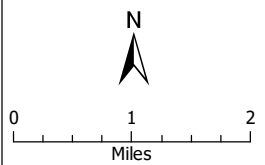


Figure 4.7-2
Fault Zones

- | Proposed Project | Project Alternatives | Zone Features |
|---|--|---|
| ■ Estrella Substation | ★ Front-of-the-Meter (FTM) Battery Storage Sites (Alternative BS-2) | — Fault Lines |
| Existing Infrastructure | ■ Alternative SS-1: Bonel Ranch Substation Site | - - - - Inferred |
| ■ Existing Substations | ■ Alternative SE-1A: Templeton Substation Expansion - 230/70 kV Substation | - · - · - · Moderately Constrained |
| - - - - 70kV Route | — Alternative PLR-1A: Estrella Route to Estrella Substation | - - - - Well Constrained |
| Reasonably Foreseeable Distribution Components | — Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1 | |
| - · - · - · New Distribution Line Segments | - - - - Alternative PLR-1C: Minor Route Variation 1 | |
| — 70 kV Minor Route Variation 1 | — Alternative PLR-1C: Minor Route Variation 2 | |
| ▲ Additional 21/12 kV Pad-Mounted Transformer | — Alternative PLR-3A: Strategic Undergrounding, Option 1 | |
| | - · - · - · Alternative PLR-3B: Strategic Undergrounding, Option 2 | |
| | — Alternative SE-PLR-2: Templeton-Paso South River Road Route | |

Source: ESRI 2018, PG&E 2019, SCWA 2017, USGS 2020

Note: The route variations shown are offset and simplified in order to display the alignments of the alternative routes that may overlap in places



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In response to Comment J-214, the text on page 4.7-21 has been revised to clarify the sensitivity of specific areas for paleontological resources. Specifically, the text has been revised 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.

In response to Comment J-215, the text on page 4.7-27 has been revised to clarify the applicability of General Order (G.O.) 95. Specifically, the text has been revised 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 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 structures also would be engineered to meet loads generated by forces such as seismic activity, as required by CPUC G.O. 95.~~

In response to Comments H-124 and J-216, the text of Mitigation Measure GEO-1, on page 4.7-30, has been revised to reference the potential for addenda or subsequent modifications to geotechnical investigation reports for the Proposed Project. Specifically, the text has been revised as follows:

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), 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. 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.

In response to Comment H-103, the text on page 4.7-35 has been revised to clarify the applicability of G.O. 95 with respect to Alternative SS-1. The text has been revised as follows:

Further, design and construction requirements in G.O. ~~95 and 174, as well as~~ and the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils, ensuring the potential for such impacts would be less than significant.

In response to Comment J-217, the text of Mitigation Measure GEO-2, on page 4.7-36, has been revised to allow for the use of additional measures of paleontological sensitivity. Specifically, the text has been revised 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, and may use additional measures of paleontological sensitivity as determined appropriate by the qualified paleontologist.

In response to Comment J-218, the text on page 4.7-39 has been revised to correct the applicable rules for design and construction of underground electric facilities under Alternative PLR-3. Specifically, the text has been revised as follows:

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. ~~12895 and 174~~, as well as the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils.

In response to Comment J-219, the text on page 4.7-40 has been revised to clarify the applicability of APM PALEO-3 to Alternative PLR-3. Specifically, the text has been revised 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. APM PALEO-3 would be implemented in a manner consistent with how it is proposed for construction within the Estrella Substation site. Therefore, impacts under significance criterion F would be **less than significant**.

In response to Comment J-220, the text on page 4.7-43 has been revised to correct the applicability of rules pertaining to construction of battery storage facilities under Alternative BS-2. Specifically, the text has been revised 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.

Section 4.8, Greenhouse Gas Emissions

In response to Comment D-27, text has been added on page 4.8-5 to indicate the amount of SF₆ emissions associated with the maximum allowed leak rate. Specifically, the following text has been added:

Operational GHG emissions would primarily come from SF₆ GIS and equipment used at the substations and power lines. These emissions were estimated using the volume of

SF₆ that would be used in the equipment and assuming the maximum allowed leak rate under current regulations of 1 percent (approximately 0.00422 metric tons per year).

Additionally, in response to Comment D-27, the text on page 4.8-7 has been revised to clarify the global warming potential of SF₆ emissions and how that relates to the emissions estimates for the Proposed Project. Specifically, the text has been revised as follows:

Amortized over the 30-year life of the Proposed Project facilities, this equates to 91 MT CO₂e annually. One metric ton of SF₆ has a global warming potential equal to 22,800 metric tons of CO₂ (CO₂e), resulting in 96 MT CO₂e emitted from the GISs and equipment. When the amortized construction emissions are added to the quantified GHG emissions associated with GISs and equipment, this results in total annualized emissions of 187 MT CO₂e, which is well below the SLOCAPCD threshold of 10,000 MT CO₂e per year.

Based on Comments J-65 and J-230, text has been added on page 4.8-12 to describe the energy consumption and associated emissions of HVAC units at the transition stations for Alternative PLR-3. Specifically, the text has been revised as follows:

Once constructed, operation and maintenance of Alternative PLR-3 would involve similar number and frequency of vehicle trips compared to the Proposed Project's 70 kV power line. The transition stations at either end of the underground power line segment would include HVAC units that would consume energy when operating; however, GHG emissions associated with this energy consumption would be de minimis.

Section 4.9, Hazards and Hazardous Materials

In response to Comment H-104, the text on page 4.9-7 has been revised to reflect the larger substation parcel. Specifically, the text has been revised as follows:

The Estrella Substation would be located on approximately ~~20~~ 15 acres of land that is currently under agricultural cultivation as a vineyard.

In response to Comment J-223, the text of Mitigation Measure HAZ-1, on pages 4.9-31 to 4.9-32, has been revised to specify that PG&E and HWT would prepare separate fire prevention and management plans. Specifically, the text has been revised as follows:

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 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:

Section 4.10, Hydrology and Water Quality

None.

Section 4.11, Land Use and Planning

In response to Comment H-105, the text on page 4.11-2 has been revised to reflect the larger substation parcel. Specifically, the text has been revised as follows:

The substation would be constructed on ~~an~~ approximately 15 acres within a 20- 45-acre site, carved out of a 98-acre parcel of land designated as agriculture and currently being used as a vineyard (one of five contiguous parcels operated by Steinbeck Vineyards & Winery).

In response to Comment I-97, the text on page 4.11-17 has been revised to include where the Proposed Project has potential conflicts with local plans and policies concerning open space viewsheds and scenic corridors. Specifically, the text below has been inserted:

Section 4.1, "Aesthetics," discusses changes to open space viewsheds and scenic corridors as a result of the Proposed Project. Although the Estrella Substation would generally not obstruct open space viewsheds, the Proposed Project's 70 kV power line may be visible from several viewpoints throughout the City of Paso Robles and surrounding areas; however, this change in view would be minor and would not substantially affect open space viewsheds that have been identified in the City of Paso Robles's General Plan. The new 70 kV power line and reconductoring segment would cross SR 46 (eligible for listing as a state-designated scenic highway) but would not substantially impair views from SR 46 or screen landscape features that are not already obstructed by the presence of the existing distribution line and power line.

Development and operation of the Estrella Substation would permanently alter the site's visual character and would be visually inconsistent with the surrounding landscape. The new 70 kV power line would have similar adverse effects, although the degree of impact would vary by location. The Substation facilities would also dominate views from Union Road, which is designated by the City of Paso Robles as a visual corridor and gateway into the City of Paso Robles. Additionally, the section of new power line proposed in the area along Golden Hill Road where the Cava Robles RV Park is located (which has been designated as Parks and Open Space by the City of Paso Robles) would substantially degrade the visual character of the area. As further described in Section 4.1, "Aesthetics," these impacts would be significant and unavoidable.

Section 4.12, Mineral Resources

None.

Section 4.13, Noise and Vibration

In response to Comment H-19, the text on page 4.13-18 has been revised to clarify the nature of the ground-level construction noise impacts. Specifically, the text has been revised as follows:

Nevertheless, with implementation of APMs and Mitigation Measure NOI-1, which would expand requirements from the APMs, the ground-level construction noise from the Proposed Project would not be significant given: (1) the limited number of noise-sensitive receptors in proximity to much of the Proposed Project; (2) the relatively rapid attenuation of even the loudest pieces of construction equipment with distance from the source, and (3) the impacts would be temporary and occur over a relatively short duration at individual structure locations or segments of the 70 kV power line alignment (as opposed to work occurring along the entire alignment simultaneously).

...

Conclusion

Overall, the ground-level construction noise impacts would be less than significant with mitigation ~~are not expected to be significant~~.

Additionally, in response to Comment H-19, the text of Mitigation Measure NOI-1, on page 4.13-19, has been revised to clarify that the ground-level noise mitigation measures would apply to construction activities associated with the 70 kV power line, and thus would only apply to PG&E. Specifically, the text has been revised as follows:

Mitigation Measure NOI-1: General Construction Noise.

~~HWT and~~ PG&E shall implement the following procedures for ~~all~~ construction activities associated with the 70 kV power line:

In response to Comment J-228, the fifth bullet of Mitigation Measure NOI-1, on page 4.13-19, has been revised to clarify when nighttime work may occur. Specifically, the text has been revised as follows:

- Sensitive Periods. To the extent practicable, construction activities that have a high likelihood of resulting in a noise nuisance for residents in the vicinity shall not be scheduled during sensitive morning or evening periods (7:00 am to 9:00 am, and 7:00 pm to 10:00 pm), to limit the potential for noise nuisance. Nighttime work between the hours of 10:00 pm and 7:00 am shall not occur, except when electrical clearances are not available during daytime hours or when safe completion of a construction procedure is needed.

In response to Comments J-77 and J-229, the first and third bullets of Mitigation Measure NOI-2, on pages 4.13-19 to 4.13-20, has been revised to revise the advance notification requirement for

helicopter activities and clarify the types of helicopters that are subject to hovering restrictions. Specifically, the text has been revised as follows:

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 ~~14~~ 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.
- **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.

In response to Comments J-65 and J-230, the text on page 4.13-31 has been revised to disclose the HVAC units at the transition stations under Alternative PLR-3 and their noise effects. Specifically, the text has been revised as follows:

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.

Section 4.14, Population and Housing

In response to Comment J-231, the text on page 4.14-3 has been revised to reflect the lower number of construction workers needed per day for construction of the Estrella Substation. Specifically, the text has been revised as follows:

At the peak of construction of the respective components, it is estimated that construction of the Estrella Substation would require ~~12~~10 to 15 workers per day, while construction of the 70 kV power line would require 30 workers per day.

In response to Comment I-32, the text on page 4.14-4 has been revised to clarify the statement regarding projected population growth in the City of Paso Robles and to add citations for this information. Specifically, the text has been revised as follows:

Overall, City planners estimate a nearly 50 percent increase in the population of Paso Robles by 2045 (NEET West and PG&E 2020a; City of Paso Robles 2014; U.S. Census Bureau 2014).

Section 4.15, Public Services

In response to Comment J-232, the text on page 4.15-12 has been revised to correct the location of the northern new distribution line segment along SR 46. Specifically, the text has been revised as follows:

However, the northern new distribution line segment would be installed ~~within the~~ along one side of SR 46 on private property ~~median~~, which could result in temporary impacts to this highway.

In response to Comment J-233, the text on page 4.15-16 has been revised to clarify that the extended single lane closures along the Alternative PLR-3 alignments during construction would adversely affect emergency vehicle access and access to the Cava Robles RV Park. Specifically, the text has been revised as follows:

As described in Chapter 3, *Alternatives Description*, construction of Alternative PLR-3 (both Options 1 and 2) would require extended single lane closures on the roadways included in the alternative alignments (i.e., Germaine Way, Wisteria Lane, Golden Hill Road, Cava Robles RV Resort driveway, and Circle B HOA road). The extended single lane closures would adversely affect emergency vehicle access and access to the Cava Robles RV Park.

Section 4.16, Recreation

None.

Section 4.17, Transportation

In response to Comment J-234, the text on page 4.17-4 has been revised to clarify 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) and Wellsona Road. Specifically, the text has been revised as follows:

Alternatives PLR-1A and PLR-1C propose improvements in the vicinity of an unsignalized four-way intersection of ~~US 101~~ North River Road with Wellsona Road.

In response to Comment B-9, the text on page 4.17-4 has been revised to provide information from the City of Paso Robles on the SR 46 overcrossing bridge project at Union Road. Specifically, the text has been revised as follows:

State Route 46 (SR 46) is the major east-west corridor in San Luis Obispo County that connects the Central Coast to the Central Valley, thus traffic on SR 46 is largely interregional, including substantial recreational, tourist and truck traffic (San Luis Obispo Council of Governments [SLOCOG] 2019). The City of Paso Robles, in collaboration with Caltrans and SLOCOG, is proposing to develop a new SR 46 overcrossing bridge at Union Road.

In response to Comment J-235, the text on page 4.17-4 has been revised to correct the location of the northern reasonably foreseeable distribution line segment relative to the SR 46 right of way. Specifically, the text has been revised as follows:

The northern reasonably foreseeable distribution new line segment would be installed ~~within the~~ along one side of the SR 46 right of way adjacent to and northeast of Hunter Ranch Golf Course. The 70 kV power line under Alternative PLR-1A would cross SR 46 near the intersection with Branch Road.

In response to Comment J-304, the text of Mitigation Measure TR-1, on page 4.17-18, has been revised to clarify that HWT and PG&E would each prepare separate traffic control plans and that encroachment permits would be issued by Caltrans, County of San Luis Obispo, and/or City of Paso Robles. Specifically, the text has been revised as follows:

Mitigation Measure TR-1: Construction Traffic Control Plan

HWT and PG&E shall each implement a traffic control plan during Proposed Project construction and/or during construction of the reasonably foreseeable distribution components or selected alternative. The traffic control plan will minimize vehicle travel delays and potential roadway hazards on public roadways during construction activities. The traffic control plan may be used to satisfy requirements imposed in encroachment permits ~~from~~ issued by Caltrans, County of San Luis Obispo, and/or City of Paso Robles.

In response to Comment I-110, the second two bullets in Mitigation Measure TR-1, on page 4.17-18, have been revised require that routing of traffic around construction work areas during temporary lane closures and/or detours during temporary road closures provide for continuity

of access for all vehicles lawfully using the applicable public roadways in compliance with the California Vehicle Code. Specifically, the text has been revised as follows:

- For any lane closures, signage, flaggers, and/or other devices shall be used to route vehicle traffic around the construction work area. The traffic control measures shall ensure that pedestrians and bicyclists are provided safe passage around the work area, where applicable. The routing of traffic around the construction work area during temporary lane closures shall be adequate to provide for continuity of access for all vehicles lawfully using the applicable public roadways in compliance with the California Vehicle Code.
- For any road closures, detours shall be provided and signage, flaggers, and/or other devices shall be used to ensure motorists, pedestrians, and bicyclists are able to safely pass through the detour areas. Detours during temporary road closures shall be adequate to provide for continuity of access for all vehicles lawfully using the applicable public roadways in compliance with the California Vehicle Code.

In response to Comment J-304, the fourth bullet in Mitigation Measure TR-1, on page 4.17-18, has been revised as follows:

- Protocols from the applicable agencies to notify police, fire, and other emergency services departments serving the area shall be notified of planned lane or road closures on public roadways at least 48 hours in advance.

In response to Comment J-236, the text on page 4.17-22 has been revised to correct the location of the northern reasonably foreseeable distribution line segment relative to the SR 46 right of way. Specifically, the text has been revised as follows:

However, the northern reasonably foreseeable new distribution line segment would be installed ~~within the~~ along one side of the SR 46 right-of-way and the additional 21/12 kV pad-mounted transformers would be installed along existing public roadways; thus, these activities would have potential to disrupt traffic and alternative transportation modes.

In response to Comment H-107, the text on page 4.17-23 has been revised to clarify that transportation-related effects during construction for Alternative SS-1 would last longer due to the longer construction schedule for this alternative. The text has been revised as follows:

The number of construction vehicle trips and the frequency of trips for Alternative SS-1 is estimated to be the same as for the Proposed Project (see Table 4.17-3); however, the effects of construction-related transportation impacts would last longer due to the longer construction schedule for Alternative SS-1.

In response to Comment H-108, the text on pages 4.17-27 to 4.17-28 has been revised to clarify that transportation-related effects during construction for Alternative SE-1A would last longer

due to the longer construction schedule for this alternative. The text has been revised as follows:

The number of construction vehicle trips and the frequency of trips for Alternative SS-1 is estimated to be the same as for the Proposed Project (see Table 4.17-3); however, the effects of construction-related transportation impacts would last longer due to the longer construction schedule for Alternative SE-1A.

Section 4.18, Tribal Cultural Resources

In response to Comment J-237, the text on page 4.18-7 has been revised to clarify the assumed significance of Site 36052-S-003. Specifically, the text is revised as follows:

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.

In response to Comment J-238, the text on page 4.18-7 has been revised to remove a reference to the prehistoric lithic scatter at Site 36052-S-003. Specifically, the text has been revised as follows:

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.

In response to Comment J-239, the text on page 4.18-7 has been revised to clarify the potential for archaeological deposits to be encountered in deep excavations for installation of pole foundations. Specifically, the text has been revised as follows:

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).

In response to Comment J-240, the text on page 4.18-7 has been revised to reflect that implementation of APM CUL-5 would allow for the identification of potential TCRs that are archaeological in nature, thus reducing potential for impacts on TCRs. Specifically, the text has been revised as follows:

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.

In response to Comment J-241, the text on page 4.18-7 has been revised to clarify the distinction between archaeological materials and TCRs. Specifically, the text has been revised as follows:

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.

In response to Comment J-242, the text of Mitigation Measure TCR-1, on page 4.18-8, has been revised to clarify that the tribe identified the Santa Ysabel Ranch area as culturally sensitive for buried archaeological resources that could be TCRs. Specifically, the text has been revised as follows:

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.

In response to Comment J-243, the text of Mitigation Measure TCR-1, on page 4.18-8, has been revised to clarify the assumptions regarding potential TCRs unearthed by project activities and to ensure that these actions will be consistent with Mitigation Measure CR-1. Specifically, the text has been revised as follows:

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.

Section 4.19, Utilities and Service Systems

In response to Comment J-244, the text on page 4.19-5 has been revised to correct an inaccurate word choice. Specifically, the text has been revised as follows:

PG&E provides electrical power to San Luis Obispo County, including the city of Paso Robles. PG&E ~~generates~~ provides electricity from the following sources: (1) PG&E-owned generators; (2) non-PG&E-owned generators within California; and (3) out-of-state generators.

In response to Comment J-245, the text on page 4.19-16 has been revised to indicate that the FTM BESSs would likely generate reduced quantities of solid waste compared to the reasonably foreseeable distribution components. Specifically, the text has been revised as follows:

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. 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.

Section 4.20, Wildfire

In response to Comment H-109, the text on page 4.20-6 has been revised to reflect the larger substation parcel size. Specifically, the text has been revised as follows:

The proposed Estrella Substation would be located on approximately 15 acres of a 20-acre site ~~and~~ within an existing vineyard.

In response to Comment J-246, the text on page 4.20-21, under the impact discussion for Alternative BS-2, has been revised to reflect that new access roads may need to be constructed and maintained throughout the operation of the FTM facilities. Specifically, the text has been revised as follows:

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.

Chapter 5, Alternatives Analysis Summary and Comparison of Alternatives

In response to Comment H-111, the text on page 5-11 has been revised to indicate that the Bonel Ranch site is currently under a Williamson Act contract. Specifically, the text has been revised as follows:

Additionally, while the Bonel Ranch site is currently in agricultural use (alfalfa production) and is subject to Williamson Act contract, it is not on land classified as one of the protected categories of Important Farmland under CEQA (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland); thus, placing the substation at

this location would reduce the Proposed Project’s significant impacts on agriculture resources.

In response to Comment DZ-1, the text on page 5-13 has been revised to remove the statement that City of Paso Robles prefers the Proposed Project 70 kV route. Specifically, the text has been revised as follows:

~~It should be noted that the City of Paso Robles expressed a preference for the Proposed Project 70 kV route, and~~ PG&E has stated that having an overhead power line through an industrial area (Golden Hill Industrial Park) would be advantageous to customers that may wish to connect directly to the 70 kV system.

In response to Comment J-25, the text on page 5-16 has been revised to clarify that Alternatives BS-2 and BS-3 could be evaluated through the DIDF. Additionally, in response to Comment J-25, the language has been clarified regarding the cost of potential solutions under Alternatives BS-2 and BS-3 with respect to the DIDF. Specifically, the text has been revised as follows:

~~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).

In response to Comment J-45, the cost estimate for Alternative Combination #1 in Table 5-3 on page 5-17 has been revised to correct the length and associated cost of the undergrounding segment. Specifically, the information in Table 5-3 has been revised as follows:

Component	Cost/Mile ^{1,2}	Proposed Project		Alternative Combination #1 (With Undergrounding)	
		Length (miles)	Cost Estimate	Length (miles)	Cost Estimate
New Overhead 70 kV Power Line	\$3,008,000	7	\$21,056,000	5.9	\$17,747,200
Reconducted Overhead 70 kV Power Line	\$1,738,000	3	\$5,214,000	3	\$5,214,000
Undergrounded 70 kV Power Line	\$17,705,000	0	\$0	1.1 1.2	\$19,457,500 \$21,246,000
Total:			\$26,270,000		\$42,436,700 \$44,207,200
Cost compared to Proposed Project:			N/A		+62% +68%

Additionally, in response to Comment J-45, the following language has been added to the first passage in Footnote 2 to Table 5-3:

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.

In response to Comments L-27 and BK-4, the text of Footnote 3 in Table 5-3 on page 5-17 has been revised to correct the alternative combination number. Specifically, the text has been revised as follows:

Engineering and construction costs for the 70 kV power line portion of Alternative Combination ~~#4~~ **#3** would likely be less than the Proposed Project 70 kV power line due to the shorter line length. However, right of way acquisition costs could be higher due to the difficulties associated with obtaining approval from the homeowners associations along this route. Additionally, the substation under Alternative Combination ~~#4~~ **#3** would be more expensive to construct due to the need to rebuild portions of the existing Templeton Substation and because the land may be more expensive to require. PG&E data responses to Energy Division in 2017 indicate that the Templeton Expansion Alternatives would be more expensive than the Proposed Project. PG&E marked these responses as confidential.

Chapter 6, Other Statutory Considerations and Cumulative Impacts

In response to Comment D-133, text has been added to page 6-2 to describe the permanent and irreversible losses of Important Farmland. Specifically, the following text has been added:

Additionally, as described in Section 4.2, "Agricultural Resources," the Proposed Project and/or several of the alternatives (PLR-1A, PLR-1C, and SE-PLR-2) would involve losses of Important Farmland. Despite application of compensatory mitigation mechanisms (i.e., conservation easements) via Mitigation Measure AG-1, these losses of Farmland would be permanent and irreversible.

In response to Comment I-32, the text on pages 6-3 to 6-4 has been revised to clarify the statement regarding projected population growth in the City of Paso Robles and to add citations for this information. Specifically, the text has been revised as follows:

Overall, City planners estimate a nearly 50 percent increase in the population of Paso Robles by 2045 (NEET West and PG&E 2020a; City of Paso Robles 2014; U.S. Census Bureau 2014).

In response to Comments H-112 and J-247, the text in Table 6-3 on page 6-13, within the column titled "Contribution of the Proposed Project, Reasonably Foreseeable Distribution Components,

and Alternatives,” has been revised to clarify that the aesthetic impacts of some other alternatives would require mitigation to reduce them to a less-than-significant level. Specifically, the text has been revised as follows:

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.

In response to Comment J-248, the text in Table 6-3 on page 6-16, within the column titled “Contribution of the Proposed Project, Reasonably Foreseeable Distribution Components, and Alternatives,” has been revised to clarify that the noise impacts of Alternative SE-1A would require mitigation to reduce them to a less-than-significant level. Specifically, the text has been revised as follows:

~~Other alternatives and t~~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.

In response to Comment H-113, the text on page 6-21 has been modified to clarify the nature of impacts to agricultural resources at the project level from some of the alternatives and reasonably foreseeable distribution components. Specifically, the text has been revised as follows:

None of the other alternatives, nor the reasonably foreseeable distribution components, would ~~significantly-substantially~~ affect agricultural-sensitive farmland resources at the project level.

Chapter 7, Report Preparation

None.

Chapter 8, References

In response to Comment I-33, the following two references have been added under the heading for “Chapter 2. Project Description”:

City of Paso Robles. 2014. City of El Paso de Robles General Plan – Land Use Element Update. Available at: <https://www.prcity.com/DocumentCenter/View/25849/20140401-Paso-GP-Land-Use-Element>. Accessed April 26, 2021.

United States Census Bureau. 2014. Demographic and Housing Estimates. Available at: <https://data.census.gov/cedsci/table?q=2014&g=1600000US0622300&tid=ACSDP5Y2014.DP05>. Accessed April 26, 2021.

In response to Comment J-183, the following reference has been added under the heading for Section 4.4, Biological Resources:

Estrella Substation and Paso Robles Area Reinforcement Project Final Environmental Impact Report Volume 3 – Comments and Responses to Comments	4-75	March 2023 Project 17.010
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Avian Power Line Interaction Committee. 2018. Eagle Risk Framework: A Practical Approach for Power Lines. Edison Electric Institute and APLIC. Washington, DC.

In response to Comment D-334, the following two references have been added under the heading for Section 4.4, Biological Resources:

California Department of Fish and Game. 2000. Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83990>. Accessed December 21, 2022.

California Department of Fish and Wildlife. 2012. CDFW's 2012 Staff Report on Burrowing Owl Mitigation. Available at: <https://wildlife.ca.gov/Search-Results?q=burrowing%20owl#gsc.tab=0&gsc.q=burrowing%20owl&gsc.page=1>. Accessed December 21, 2022.

In response to Comment D-25, the following reference has been added under the heading for Section 4.4, Biological Resources:

eBird. 2021. Golden eagle at Barney Schwartz Park. The Cornell Lab. Available at: www.ebird.org. Ithaca, NY. Accessed: May 17, 2021.

In response to Comment D-21, the following reference has been added under the heading for Section 4.4, Biological Resources:

Garcia and Associates. 2020. Memorandum to Molly Peterson, Pacific Gas & Electric Company RE: Golden Eagle and Raptor Survey Memo for the Estrella Substation & Paso Robles Area Power Connect Project. July 2020.

4.1.2 Volume 2 – Appendices

Appendix A, Local Laws, Regulations, Policies, and Plans

None.

Appendix B, Final Alternatives Screening Report

Behind-the-Meter Solar plus Storage Adoption Propensity Analysis

In response to Comment J-306, the text on page 10 of the Behind-the-Meter (BTM) Solar plus Storage Adoption Propensity Analysis (“BTM Analysis”) has been revised to explain the scope of customers considered in the analysis. Specifically, the text 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.

In response to Comment J-307, the text on page 11 of the BTM Analysis has been revised 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 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.

In response to Comment J-314, the text in Table 3 on page 13 of the BTM Analysis has been revised to include language to clarify the assumed cost of residential PV solar systems. Specifically, the text has been revised as follows:

Input	Residential Analysis
Solar system size, performance, and cost	Photo voltaic (PV) kilowatt (kW) size is optimized based on household energy consumption. PV performance is modeled using NREL PV Watts PV system cost is aligned with IRP assumptions on dollars per watt (<u>\$2.90/W</u>) for 2019

In response to Comment J-330, text has been added in Table 3 on page 13 of the BTM Analysis to indicate the specifications that were used for a Tesla PowerWall in the analysis. Specifically, the following text has been added:

Input	Residential Analysis
Storage system size, performance, and cost	7 kW/13.5 kilowatt hour (kWh) lithium ion <u>5 kW continuous output rating</u> Customer adoption of # of batteries is optimized based on historic load and payback period. Storage performance uses estimates used in the 2019 IRP, including: 10 year warranty 85% round trip efficiency 0% degradation rate Storage system total cost (hardware plus installation) is \$9,376, calculated based on IRP “mid cost option” assumption for storage costs for 2019

In response to Comment J-316, footnotes have been added to Table 3 on page 14 of the BTM Analysis to explain how the SGIP and ITC programs were factored analysis, including the assumptions regarding incentives. Specifically, the following text has been added:

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.

In response to Comment J-313, a footnote has been added on page 14 of the BTM Analysis to include language to clarify the use of a 10-year payback period. Specifically, the new footnote text is as follows:

¹² 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.

In response to Comment J-315, the text on page 15 of the BTM Analysis has been revised to add citations related to the value of lost load used to derive the assumptions used in the analysis. Specifically, the following text has been added:

The Value of Lost Load is an economic indicator used to assign a dollar cost to the interruption of electricity delivery. This can represent the cost consumers are willing to pay to avoid an outage or public safety power shutoff. Publicly available studies on this value ranges from \$5 - \$20/kWh. This analysis used a Value of Lost Load on the low side of stated ranges. The CPUC's new resiliency and microgrids proceeding (R.19-09-009) is expected to provide guidance regarding this assumption.

Other studies that were used to inform this assumption include:

Sullivan, Michael J. et al. (2009). *Estimated Value of Service Reliability for Electric Utility Customers in the United States*. Lawrence Berkeley National Laboratory.

Frayer, J., S. Keane, and J. Ng. (2013). *Estimating the Value of Lost Load*. Prepared for ERCOT by London Economics International LLC.

Southern California Edison (No Date). *Aberhill System Project: Data Request Item C – Planning Study: ED-Aberhill-SCE-JWS-4: Item C*.

In response to Comment J-332, the text on page 24 of the BTM Analysis has been revised to note that there is no off-the-shelf solution for large-scale BTM aggregation at this time, and that a potential future Request for Proposals (RFP) should consider capabilities for aggregation. Specifically, the text has been revised as follows:

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

Additionally, the following text has been added to page 27:

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

In response to Comment J-333, the text on page 27 of the BTM Analysis has been updated to not that there is currently no ability to coordinate discharge of BTM resources and this should be considered in a future RFP. Specifically, the text has been updated as follows:

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.

Appendix C, Air Quality, Greenhouse Gas Emissions, and Energy Analyses

None.

Appendix D, Biological Resources Supporting Information

None.

Appendix E, Noise Analysis Calculations

None.

Appendix F, Mitigation Monitoring and Reporting Plan

In response to Comment J-249, the text on page F-4 in Appendix F has been revised to indicate that an environmental database may not be used for daily reports pursuant to the Proposed Project. Specifically, the text has been revised as follows:

HWT and PG&E are required to have their own monitors for particular resources, depending on project needs and activities. These monitors shall provide daily reports/surveys ~~that are entered into a field record environmental database employed by HWT and PG&E.~~

In response to Comments J-113 and J-250, the first bullet of Mitigation Measure AES-1, on page F-9, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to indicate that landscaping incorporated between Union Road and the Estrella Substation would need to comply with the standards provided in PG&E’s Wildfire Safety Inspection Program and CAL FIRE’s defensible space guidelines, and to delete reference to the County Fire Department. Specifically, the text has been revised 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 in accordance with the standards provided in PG&E’s Wildfire Safety Inspection Program and CAL FIRE’s defensible space guidelines. 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.

In response to Comments H-114, J-114 and J-251, the second bullet of Mitigation Measure AES-1, on page F-9, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to conform to current PG&E practices regarding fencing around substation facilities. Specifically, the text has been revised as follows:

- At the substation’s southeastern perimeter fronting Union Road (where practicable), incorporate chain link fence slats or mesh fabric using natural colors that are compatible with the surrounding area (i.e., green, light brown, gray) in order to minimize visual contrast.

In response to Comments J-115, J-252, and I-59, the third bullet of Mitigation Measure AES-1, on pages F-9 to F-10, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify the requirements for a dulled finish on Proposed Project and alternative components, and to provide additional information on the types of finishes that may be used on power line poles. Specifically, the text has been revised as follows:

- For all Proposed Project and alternative components (not including the power line conductors), use ~~materials and~~ a dulled finish or paint colors that are compatible with the surrounding area (i.e., dull grey, light brown, or green colors) in order to minimize visual contrast. Examples of dulled finishes include use of galvanized steel or naturally weathered steel. 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.~~

In response to Comment J-116 and J-253, the fourth bullet of Mitigation Measure AES-1, on page F-10, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been deleted. Specifically, the text has been revised 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.~~

In response to Comment I-55, an additional bullet has been added to Mitigation Measure AES-1 on page F-10, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” to require the replacement of landscaping along Golden Hill Road. Specifically, the text has been revised as follows:

- Where practicable and in accordance with CPUC G.O. 95 and other applicable laws, HWT and PG&E shall replace any existing landscaping that requires removal due to construction of the proposed 70 kV power line along the publicly

accessible portions of Golden Hill Road, unless the underlying land owner specifically requests non-replacement of landscaping.

In response to Comments H-16, J-58, J-122, J-254, D-60, and R.C-14, the text of Mitigation Measure AG-1, on pages F-11 to F-13, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to modify the process for compensation. Specifically, the text has been revised as follows:

Mitigation Measure AG-1: Provide Compensation for Loss of Agricultural Land.

To compensate for the loss of Farmland of Statewide Importance and Unique Farmland, HWT and PG&E shall, prior to the completion construction of the Proposed Project or alternative, construction, shall either:

- 1) eContribute sufficient funds in an amount equal to the fair market value, based upon value prior to beginning of project construction, of the impacted Farmland of Statewide Importance and Unique Farmland, as it applies to each Applicant’s specific impacts (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program⁵, 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 which will achieve similar long-term preservation of agricultural lands in San Luis Obispo County;
- 2) Enter into and record one or more conservation easements with landowners for land classified as the same or greater FMMP Important Farmland category as the land impacted and is under vineyard production at a 1:1 ratio by acreage for the impacted Farmland of Statewide Importance and Unique Farmland; or
- 3) A combination of clauses 1 and 2, above, may be implemented via a financial contribution equaling the fair market value, consistent with clause 1, of any land acreage not conserved via a conservation easement in a 1:1 ratio by acreage, consistent with clause 2.

Each Applicant may implement this mitigation measure independently or jointly for the acreage of their respective impacts. Any fair market value estimates, proposed recipients of financial contributions, and proposed conservation easements shall be submitted to the CPUC for review and approval prior to funding and/or execution to assure fulfillment of the intent of this mitigation measure.

⁵ 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 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.~~

In response to Comment J-123 and J-255, the text of Mitigation Measure AG-2, on pages F-13 to F-15, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," has been revised 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. Additionally, in response to Comment D-371, the text has been revised to clarify the potential sources of topsoil and conditions regarding the depth of topsoil, as well as to clarify that restoration actions must be consistent with the stormwater pollution prevention plan (SWPPP) best management practices (BMPs). Finally, in response to Comment D-68, text has been added to clarify the definition of restoration of agricultural land. Specifically, the text has been revised as follows:

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 associated with their respective components 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 equivalent value agricultural crops unless the property owner requests that the material remain for their use. Topsoil may be sourced from other areas of the Proposed Project (e.g., topsoil stripped and stockpiled as part of Estrella Substation construction) or may be purchased within San Luis Obispo County. The depth of topsoil following restoration shall match the pre-project condition. The responsibility of performing these various tasks may be stipulated in an agreement between HWT, 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 ~~or and~~ PG&E shall provide just compensation for this work. HWT and PG&E shall ensure that all restoration activities pursuant to this mitigation measure, including through any agreements with landowners, are consistent with the best management practices (BMPs) in the stormwater pollution prevention plan (SWPPP).

Restoration of agricultural land shall be defined as restored to a reasonable equivalent in agricultural viability/suitability in comparison to pre-construction conditions (i.e., soil conditions are as, or more, suitable to support the same or similar crops as pre-

construction conditions), unless other arrangements with the land owner for different restoration conditions have been made. PG&E and HWT shall submit a report to CPUC after restoration efforts are completed, documenting completion of the restoration activities required by this mitigation measure.

In response to Comment J-256, the first monitoring and reporting action for Mitigation Measure AG-2, on page F-13 to F-14, within the column of Table F-1 titled “Monitoring and Reporting Action (Responsible Party),” has been struck from the FEIR. Specifically, the text has been revised as follows:

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, 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.

In response to Comment R.A-51, a footnote has been added to Mitigation Measure AQ-1 to clarify the meaning of “property line,” as referenced in the measure. Since the entirety of Mitigation Measure AQ-1 is shown in underline in Appendix F, as it is an addition to align with the changes from the Recirculated DEIR (refer to Section 4.3 of this chapter for discussion), these changes are not shown in underline/strikeout here. Refer to the revisions to Mitigation Measure AQ-1 shown for Volume 1 (see Section 4.1.1), which have been carried over to Appendix F on page F-24.

In response to Comment R.B-25, the first bullet of Mitigation Measure AQ-2 has been revised to allow for consultation with public health agencies. Since the entirety of Mitigation Measure AQ-2 is shown in underline in Appendix F, as it is an addition to align with the changes from the Recirculated DEIR (refer to Section 4.3 of this chapter for discussion), these changes are not shown in underline/strikeout here. Refer to the revisions to Mitigation Measure AQ-2 shown for Volume 1 (see Section 4.1.1), which have been carried over to Appendix F on pages F-26 to F-27.

In response to Comment H-116, the title of APM BIO-1, on page F-29, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been corrected. Specifically, the text has been revised as follows:

APM BIO-1. Conduct Pre-Construction Survey(s) for Special-Status Species and Sensitive Resource Areas~~Design Project to Avoid or Minimize Impacts on Known Occurrences of Special Status Plants.~~

In response to Comment J-260, the text on pages F-31 to F-32, within the column of Table F-1 titled “Monitoring and Reporting Action (Responsible Party),” has been revised to clarify under Monitoring and Reporting Action #2 that biologists will implement the measures in accordance with APM BIO-3. Specifically, the text has been revised as follows:

2. Confirm that biologists monitor initial ground-disturbing activities in and adjacent to sensitive habitat areas and implement the measures in accordance with this APM. (CPUC)

In response to Comment J-261, the text on page F-32, within the column of Table F-1 titled “Monitoring and Responsible Action (Responsible Party),” has been revised to change the responsibility for implementing Monitoring and Reporting Action #2 from the CPUC to the Project Proponents. Specifically, the text has been revised as follows:

2. Confirm that trenches/excavations have a sloped escape ramp or are covered at the end of each day. (Project Proponents ~~CPUC~~)

In response to Comment J-262, the text on page F-33, within the column of Table F-1 titled, “Monitoring and Responsible Action (Responsible Party),” has been revised to change the responsibility for implementing Monitoring and Reporting Action #3 from the CPUC to the Project Proponents. Specifically, the text has been revised as follows:

3. Confirm that trenches and excavations are inspected for wildlife at the beginning of the workday and prior to backfilling. (Project Proponents ~~CPUC~~)

In response to Comments J-146 and J-263, the text of subsection a. in Mitigation Measure BIO-1, on page F-34, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised 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. Specifically, the text has been revised as follows:

- a. **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 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (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~~ CPUC-approved qualified botanist to identify plants.

In response to Comments J-147 and J-264, the text of subsection b. in Mitigation Measure BIO-1, on page F-34, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to state that a CPUC-approved biologist(s) shall be retained to conduct pre-construction surveys, rather than a USFWS- and CDFW-approved biologist(s). Specifically, the text has been revised as follows:

- b. **Biological Monitoring, Sensitive Habitat Areas, and Special-Status Species:** HWT/PG&E shall retain a ~~CPUC, USFWS, and CDFW~~ CPUC-approved biologist(s) to conduct pre-construction surveys for special-status plants and wildlife prior to initial vegetation clearance, grubbing, and ground-disturbing activities.

In response to Comments J-148 and J-265, the text of subsection b. in Mitigation Measure BIO-1, on page F-35, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify that pre-construction surveys shall be conducted within the work areas, and to state that CPUC shall not be required to review and approve the preconstruction survey report prior to the start of construction. Additionally, in response to Comment D-334, text has been added to the same passage of Mitigation Measure BIO-1 to require special survey techniques for burrowing owl, Swainson’s hawk, and white-tailed kite. Further, in response to Comment H-101, text has been added to clarify the pre-construction survey requirements for Crotch’s bumble bee. Specifically, the text has been revised as follows:

The pre-construction surveys shall be conducted no earlier than 30 days prior to surface disturbance within the work areas. The pre-construction surveys shall incorporate specialized techniques for burrowing owl in accordance with CDFW’s 2012 Staff Report on Burrowing Owl Mitigation in areas identified as having suitable habitat for burrowing owl. Additionally, HWT and PG&E shall conduct pre-construction surveys for Swainson’s hawks and white-tailed kite based on the Swainson’s Hawk Technical Advisory Committee’s 2000 Recommended Timing and Methodology for Swainson’s Hawk Nesting Surveys in California’s Central Valley. Pre-construction surveys for Crotch’s bumble bee shall be conducted during the flying season. 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.

In response to Comment D-337, the text of subsection b. in Mitigation Measure BIO-1, on page F-36, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” to provide clarification regarding “sensitive habitat areas”. Additionally, in response to Comments J-150 and J-266, the same passage has been revised to state that work within 50 feet of wetlands and waters of the U.S. will be monitored by a biological monitor over its duration. Specifically, the text has been revised as follows:

Areas identified as Sensitive habitat areas in the pre-construction survey report, 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. Habitat areas will be considered sensitive if there are special-status species present, or potentially present, in an area that needs to be avoided in order to prevent disturbance or harm to the 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; however, work ~~near~~ within 50 feet of wetlands and waters of the U.S. will be monitored by a biological monitor over its duration.

In response to Comment J-151 and J-267, the text of subsection b. in Mitigation Measure BIO-1, on page F-36, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation

Measure,” has been revised to state that a CPUC-approved biologist, rather than a USFWS- and CDFW-approved biologist, shall flag boundaries of habitat to be avoided. Specifically, the text has been revised as follows:

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.

In response to Comments J-152 and J-268, the text of subsection b. in Mitigation Measure BIO-1, on page F-37, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised 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. Specifically, the text has been revised as follows:

The ~~USFWS and CDFW~~ CPUC-approved biologist shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats.

In response to Comments H-119, J-153, and J-269, the text of Mitigation Measure BIO-1, on page F-38, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to omit the placement of gravel bags since gravel bags and erosion and sediment controls would be implemented per the SWPPP and do not need to be mentioned in this section. Additional language has been added to clarify the role of BMPs implemented as part of the SWPPP. Specifically, the text has been revised as follows:

~~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 protection BMPs. Erosion and sediment control BMPs shall be included in the SWPPP for the Proposed Project or alternative and shall be fully implemented during construction. These BMPs shall effectively minimize any erosion or sedimentation into nearby wetlands and/or waters of the U.S., and shall be removed upon the completion of construction.~~

In response to Comment H-118, the text of Mitigation Measure BIO-1, on page F-38, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to state that weekly biological construction monitoring reports shall be prepared and submitted to the CPUC, rather than the appropriate permitting and responsible agencies. Specifically, the text has been revised as follows:

Weekly biological construction monitoring reports shall be prepared and submitted to the CPUC ~~appropriate permitting and responsible agencies~~ throughout the duration of the ground-disturbing and vegetation-removal construction phase.

In response to Comments J-154 and J-270, the text of subsection b. in Mitigation Measure BIO-1, on page F-39, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised 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. Specifically, the text has been revised 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.

In response to Comments H-117, J-155, and J-272, the text of subsection c. in Mitigation Measure BIO-1, on page F-39, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to state that only uncovered steep trenches and excavation will be inspected during construction twice daily. Specifically, the text has been revised as follows:

- c. **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 uncovered steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment.

In response to Comment J-271, the text of subsection c. in Mitigation Measure BIO-1, on page F-39, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to state that if the placement of earthen ramps in excavations is not feasible, then wood planks or escape ramps would be placed in the excavations to allow wildlife an escape route. Additionally, in response to Comment D-340, text has been added to the same passage to require that all open-ended project-related pipes will be capped or inspected. Specifically, the text has been revised as follows:

Excavations shall provide an earthen ramp (where feasible) and, if not, wood planks or escape ramps to allow for a wildlife escape route. All open-ended project-related pipes (not dependent on diameter size) will be capped if left overnight or inspected for wildlife prior to being moved.

In response to Comments J-156 and J-273, the text of subsection d. in Mitigation Measure BIO-1, on page F-40, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify that nesting bird season commences on January 15 for golden eagles and February 1 for all other birds. Specifically, the text has been revised as follows:

- d. **Nesting Birds:** 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 ~~revised to be January 15~~ through August 31.

In response to Comments J-157 and J-274, the text of subsection e. in Mitigation Measure BIO-1, on pages F-40 to F-41, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify that work in the immediate vicinity must stop if a kit fox is discovered and photos taken as feasible. Additionally, revisions have been made to

omit the text stating that appropriate federal and state permits must be obtained before the project can proceed if a kit fox is discovered; however, consultation with and written authorization from USFWS and/or CDFW would still be required for work to resume. Specifically, the text has been revised 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.~~ 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.

In response to Comments J-158 and D-342, the text of Mitigation Measure BIO-2, on pages F-41 to F-42, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to limit the CDFW’s approval authority; clarify the success criteria for annual plants, and clarify that invasive weeds will be monitored at the receiver site and not on the project site. Specifically, the text has been revised as follows:

MM 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 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:

- A surveyed plant population size count ~~roughly~~ equal to or greater than the number of individuals transplanted or number of individuals removed (this total may include ~~both~~ transplanted individuals that have survived, seeds that have grown into plants and have survived, as well as any additional supplemental plantings following the initial transplantation and seed dispersal that have survived at least two growing seasons), and
- Less than 5 percent cover of invasive weeds (or equivalent cover as compared with adjacent areas) within the ~~restoration area~~ receiver site.

In response to Comments J-161, J-162, J-277, and J-278, the text of Mitigation Measure BIO-3, on pages F-42 to F-43, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to indicate that HWT would not be subject to these

measures, and that PG&E would implement its existing Avian Protection Plan. Additionally, revisions are made to clarify that transmission components would need to meet applicable APLIC recommendations. Specifically, the text has been revised as follows:

MM 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 transmission and power lines to meet applicable the Avian Power Line Interaction Committee's (APLIC) ~~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).~~ In conjunction with these publications, ~~HWT and~~ PG&E shall be responsible for implementing the company's creating an Avian Protection Plan (APP) – 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 part of the APP ~~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.

In response to Comments H-122, J-163, J-164, J-279, and J-280, the text of Mitigation Measure BIO-3, on pages F-43 to F-44, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," has been revised to (1) delete a typographical error with respect to "operational construction"; (2) clarify that the nesting bird season begins on January 15 for golden eagle and February 1 for all other birds, and (3) state that a no-disturbance buffer around nests will be established in accordance with PG&E's *Nesting Birds: Specific Buffers for PG&E Activities*, and that the biologist shall inform the CPUC, not CDFW or USFWS, regarding buffer reductions and nest monitoring or as directed in regulatory agency permits. The text has been revised 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. If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive- 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. If ~~operational~~ construction activities must occur within this buffer, the biologist shall inform the CPUC coordinate with CDFW and, as necessary, USFWS to determine of any buffer reductions and/or nest monitoring to avoid impacts to active nests, and will coordinate with CDFW and USFWS if stated to do so in the project's regulatory permits.

In response to Comment D-325, text has been added to Mitigation Measure BIO-3, on page F-44, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," to clarify the process for implementing the MRV that is included in the Project Description. Specifically, the following text has been added:

PG&E shall implement an MRV (as shown in Figure 2-8 on page 2-41 in Volume 1 of this FEIR) to avoid a potential golden eagle nest along Huer Huero Creek at Union Road if this nest is determined to be occupied or is expected to be used by golden eagles in future nesting seasons (based on prior observations and the species' nest site fidelity). The MRV shall be implemented unless PG&E can demonstrate, to the satisfaction of the CPUC, that the nest in question is not occupied by golden eagles and likely will not be used in future nesting seasons.

In response to Comments J-165 and J-281, text of Mitigation Measure BIO-4, on page F-44, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," has been revised to clarify that revegetation will be conducted with site-appropriate native species that are compatible with the facility (e.g., woody plantings would not be permitted along the underground corridor for Alternative PLR-3). Specifically, the text has been revised as follows:

For any temporary impact, all disturbed soils and new fill in this habitat shall be revegetated with site-appropriate native species compatible with the facility.

In response to Comment D-313, text has been added to Mitigation Measure BIO-4, on page F-45, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," to describe the tree protection measures that would need to be implemented and to clarify the reporting requirements for any damage to an oak tree that may occur during construction activities. Specifically, the text has been revised as follows:

Oak trees in construction work areas shall be safeguarded by implementing the conditions stated in the City of Paso Robles's Oak Tree Ordinance, Section 10.01.090. This includes documentation of any damages to oak trees, and tree protection fences that will be installed to prevent compaction and injury to a tree's surface roots. For any damage to an oak tree that may occur during construction activities, the Proposed Project Applicants shall immediately report such incidents to the CPUC, in addition to any reporting to the City that may be done pursuant to Section 10.01.090. The Applicants shall be response for correcting any damage to the oak trees.

In response to Comment J-282, text of Mitigation Measure BIO-4, on page F-46, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," has been revised to permit 75 percent survival of woody plantings after 3 years as acceptable success criteria and to clarify that use of a conservation bank is also an acceptable approach. Specifically, the text has been revised as follows:

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) or at a conservation bank with a service area that covers the Proposed Project or selected alternative.

In response to Comments J-192 and J-283, the text of Mitigation Measure CR-1, on pages F-49 to F-50, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," has been revised. Specifically, the text has been revised as follows:

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 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.~~

In response to Comments J-193 and J-284, text in Mitigation Measure CR-1, on page F-50, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," has been removed since it is redundant with requirements already in APM CUL-1. Specifically, the following text has been removed:

- ~~b.a. 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.~~

In response to Comments J-194 and J-285, the text of Mitigation Measure CR-1, on pages F-50 to F-51, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," has been revised to clarify the role of the Project proponent with respect to coordinating tribal monitors. Specifically, the text has been revised as follows:

A Native American representative from a ~~consulting~~ tribe identified by the CPUC shall be retained to monitor the construction activities if the resource is a Native American archaeological site that will be encroached upon. 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. If an archaeological resource will be directly impacted, a detailed archaeological treatment plan shall be developed and implemented by the Project proponent's cultural resources principal investigator, as defined in APM CUL-1.

In response to Comments J-196 and J-287, text has been added to Mitigation Measure CR-1, on page F-53, within the column of Table F-1 titled "Applicant Proposed Measure or Mitigation Measure," to specify procedures regarding the assessment of significance and treatment of discovered cultural resources. Specifically, the following text has been added:

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).

In response to Comment J-197 and J-288, the text of Mitigation Measure CR-1, on page F-54, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify procedures surrounding treatment methods documented in a technical report for discovered cultural resources. Specifically, the text has been revised 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. 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. 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.

In response to Comments J-201 and J-290, text has been added to Mitigation Measure CR-2, on pages F-56 to F-57, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” to further describe the responsibilities of the most likely descendant. Specifically, the following text has been added:

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. 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.

In response to Comments J-202 and J-291, text has been added to Mitigation Measure CR-2, on page F-57, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” to clarify the process for recommencing work after treatment of discovered human remains. Specifically, the following text has been added:

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.~~

In response to Comment J-203, text has been added to Mitigation Measure CR-3, on page F-57, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” to describe timelines for CPUC to comment on or concur with the findings of technical reports. Specifically, the following text has been added:

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.

In response to Comments J-204 and J-292, text has been added to Mitigation Measure CR-3, on page F-58, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” to provide more specificity regarding the archaeological pedestrian survey. Specifically, the following text has been added:

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

In response to Comment J-205 and J-293, text has been added to Mitigation Measure CR-3, on pages F-59 to F-60, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” to describe timelines for CPUC to comment on or concur with the findings of treatment plans for human remains and the data recovery plans for eligible archaeological sites. Specifically, the following text has been added:

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.

In response to Comment J-206, text has been added to Mitigation Measure CR-3, on pages F-60 to F-61, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” to be consistent with Mitigation Measure TCR-1. Specifically, the following text has been added:

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). 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).

In response to Comments H-124, J-216, and J-294, the text of Mitigation Measure GEO-1, on pages F-68 to F-69, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to reference the potential for addenda or subsequent modifications to geotechnical investigation reports for the Proposed Project. Specifically, the text has been revised as follows:

MM GEO-1. Implement Recommendations in the Project or Alternative 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), 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. 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.

In response to Comment J-217 and J-296, the text of Mitigation Measure GEO-2, on page F-70, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to allow for the use of additional measures of paleontological sensitivity. Specifically, the text has been revised 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, and may use

additional measures of paleontological sensitivity as determined appropriate by the qualified paleontologist.

In response to Comment J-297, the text on page F-74, within the column of Table F-1 titled “Monitoring and Reporting Action (Responsible Party),” has been revised under Monitoring and Reporting Action #3 to reflect that the fire prevention and management plan would be reviewed by CAL FIRE. Specifically, the text:

- b. Confirm that the plan is reviewed by CAL FIRE ~~the San Luis Obispo County Fire Department~~. (CPUC)

In response to Comment J-223 and J-298, the text of Mitigation Measure HAZ-1, on pages F-73 to F-74, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to specify that PG&E and HWT would prepare separate fire prevention and management plans. Specifically, the text has been revised as follows:

MM 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 separate~~ 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:

In response to Comment H-19, the text of Mitigation Measure NOI-1, on page F-79, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify that the ground-level noise mitigation measures apply to construction activities associated with the 70 kV power line, and thus would also only apply to PG&E. Specifically, the text has been revised as follows:

Mitigation Measure NOI-1: General Construction Noise.

~~HWT and~~ PG&E shall implement the following procedures for ~~all~~ construction activities associated with the 70 kV power line:

In response to Comment J-228 and J-302, the fifth bullet of Mitigation Measure NOI-1, on page F-81, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify when nighttime work may occur. Specifically, the text has been revised as follows:

- Sensitive Periods. To the extent practicable, construction activities that have a high likelihood of resulting in a noise nuisance for residents in the vicinity shall not be scheduled during sensitive morning or evening periods (7:00 am to 9:00 am, and 7:00 pm to 10:00 pm), to limit the potential for noise nuisance. Nighttime work between the hours of 10:00 pm and 7:00 am shall not occur, except when electrical clearances are not available during daytime hours or when safe completion of a construction procedure is needed.

In response to Comments J-77, J-229, and J-303, the first and third bullets of Mitigation Measure NOI-2, on pages F-81 to F-82, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to revise the advance notification requirement for helicopter activities and clarify the types of helicopters that are subject to hovering restrictions. Specifically, the text has been revised as follows:

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 ~~14~~ 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.
- 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.

In response to Comment J-304, the text of Mitigation Measure TR-1, on page F-84, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify that HWT and PG&E would each prepare separate traffic control plans and that encroachment permits would be issued by Caltrans, County of San Luis Obispo, and/or City of Paso Robles. Specifically, the text has been revised as follows:

MM TR-1. Construction Traffic Control Plan.

HWT and PG&E shall each implement a traffic control plan during Proposed Project construction and/or during construction of the reasonably foreseeable distribution components or selected alternative. The traffic control plan will minimize vehicle travel delays and potential roadway hazards on public roadways during construction activities. The traffic control plan may be used to satisfy requirements imposed in encroachment permits ~~from~~ issued by Caltrans, County of San Luis Obispo, and/or City of Paso Robles.

In response to Comment I-110, the second two bullets in Mitigation Measure TR-1, on page F-85, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” have been revised require that routing of traffic around construction work areas during temporary lane closures and/or detours during temporary road closures provide for continuity of access for all vehicles lawfully using the applicable public roadways in compliance with the California Vehicle Code. Specifically, the text has been revised as follows:

- For any lane closures, signage, flaggers, and/or other devices shall be used to route vehicle traffic around the construction work area. The traffic control measures shall ensure that pedestrians and bicyclists are provided safe passage around the work area, where applicable. The routing of traffic around the construction work area during temporary lane closures shall be adequate to provide for continuity of access for all vehicles lawfully using the applicable public roadways in compliance with the California Vehicle Code.
- For any road closures, detours shall be provided and signage, flaggers, and/or other devices shall be used to ensure motorists, pedestrians, and bicyclists are able to safely pass through the detour areas. Detours during temporary road closures shall be adequate to provide for continuity of access for all vehicles lawfully using the applicable public roadways in compliance with the California Vehicle Code.

Additionally, in response to Comment J-304, the fourth bullet in Mitigation Measure TR-1, on page F-85, has been revised as follows:

- Protocols from the applicable agencies to notify pPolice, fire, and other emergency services departments serving the area ~~shall be notified~~ of planned lane or road closures on public roadways at least 48 hours in advance.

In response to Comment J-242, the text of Mitigation Measure TCR-1, on page F-86, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify that the tribe identified the Santa Ysabel Ranch area as culturally sensitive for buried archaeological resources that could be TCRs. Specifically, the text has been revised as follows:

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.

In response to Comment J-243, the text of Mitigation Measure TCR-1, on page F-87, within the column of Table F-1 titled “Applicant Proposed Measure or Mitigation Measure,” has been revised to clarify the assumptions regarding potential TCRs unearthed by project activities and to ensure that these actions will be consistent with Mitigation Measure CR-1. Specifically, the text has been revised as follows:

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.

4.2 Changes to Create the Final Environmental Impact Report

Volumes 1 (Main Body) and 2 (Appendices) of this FEIR are the revised/updated versions of what had been the DEIR in its entirety. To create the FEIR, in addition to making the changes described in Section 4.1, other minor changes were made to update the DEIR text. For example, the title pages of the respective volumes were updated to say “Final Environmental Impact Report” and to reference the current date, and the tables of contents were updated to reflect the structure of the FEIR (i.e., three total volumes). Throughout Volumes 1 and 2, generally, “DEIR” was changed to “FEIR” in the text, and footers were updated with the current date and to say “Final Environmental Impact Report.”

Additionally, the description of the public involvement process in the Executive Summary and Chapter 1, *Introduction* was updated to:

- Describe the DEIR public review period in the past tense and describe the extension to the review period afforded to the public by CPUC due to the COVID-19 pandemic;
- Describe the number and type of comment letters received during the DEIR review period;
- Describe the recirculation of portions of the DEIR; the public review period/process for the recirculated DEIR, and the comment letters received during the recirculated DEIR review period;

- Describe the process for preparing the FEIR, including responding to comments received during the DEIR and recirculated DEIR review periods, as well as organizing the FEIR into three volumes (Volume 1 and 2 being the revised DEIR), and
- Remove the section of the DEIR describing how to submit comments on the DEIR.

Chapter 1, Section 1.3 of Volume 1 also was amended to include a description of Volume 3 (“Comments and Responses to Comments on the Draft Environmental Impact Report”) and the chapters/contents of this volume. Generally, these changes were not considered substantive and are not shown in underline/strikeout in Volumes 1 and 2.

4.3 Changes to be Consistent with the Recirculated Draft Environmental Impact Report and the Changes in Response to Specific Comments

A third type of changes made in the FEIR were changes to be consistent with the Recirculated DEIR and/or changes made in response to specific comments (see Section 4.1 above). While only three chapters/sections of the DEIR were recirculated (Chapter 2, *Project Description*; Section 4.2, “Agriculture and Forestry Resources,” and Section 4.3, “Air Quality”), some of the changes in the recirculated portions of the DEIR would have affected other portions of the document, albeit in non-substantive ways. For example, within the revised and recirculated Section 4.2, “Agricultural and Forestry Resources,” changing the significance determination (from less than significant to significant and unavoidable) for Alternative SS-1 with respect to significance criterion b. (i.e., conflicts with Williamson Act contracts) would have affected the text in Table ES-2, “Summary of Impacts, Applicant-Proposed Measures, and Mitigation Measures for the Reasonably Foreseeable Distribution Components, Ultimate Substation Buildout, and Alternatives” within the *Executive Summary*. The change also would need to be carried over to Chapter 5, *Alternatives Analysis Summary and Comparison of Alternatives*, which summarizes the impacts of the Proposed Project and different alternatives combinations, as well as Chapter 6, *Other Statutory Considerations and Cumulative Impacts*, which lists the significant and unavoidable impacts of the Proposed Project and alternatives.

The same can be said for the changes in the Recirculated DEIR with respect to Section 4.3, “Air Quality,” which identified a new significant and unavoidable impact (Impact AQ-3: Potential to expose sensitive receptors to substantial pollutant concentrations) for the Proposed Project and each of the alternatives (with the exception of Alternatives BS-2 and BS-3, for which significance conclusions were not rendered). Additionally, the revised and recirculated Section 4.3, “Air Quality,” included a substantially revised version of Mitigation Measure AQ-1 from the original DEIR, and a new Mitigation Measure AQ-2 (Prepare a Valley Fever Management Plan for Review by CDPH and San Luis Obispo Department of Public Health and Final Approval by CPUC). These revised or new mitigation measures would need to be carried over to the Mitigation Monitoring and Reporting Program (MMRP), which is Appendix F in Volume 2 of the FEIR. Similarly, some of the changes included in the revised and recirculated Chapter 2, *Project Description*, (e.g., changing the size of the Estrella Substation parcel from 15 acres to 20 acres; changing the

volume of cut and fill material expected during construction of the substation, etc.) would need to be carried over to other portions of the EIR where this information is referenced.

In a similar respect, certain changes made in response to comments on the DEIR or Recirculated DEIR, as identified in 4.1, would affect other areas of the DEIR not referenced by the comments. These types of changes were made in Volumes 1 of 2 of the FEIR, where appropriate, and are shown in those volumes in underline/strikeout to denote additions and deletions.

4.4 Corrections and Clarifications Not in Response to Specific Comments

Another type of revision made in the FEIR was corrections and clarifications to the text that were not made in response to specific comments. In some cases, changes were made to correct typographical errors or to clarify the intent of a given passage. While not identified or initiated by a specific comment received on the DEIR or Recirculated DEIR, these revisions (where substantive) are shown in underline/strikeout within Volume 1 of the FEIR. Non-substantive changes, such as correcting a misspelling, are not shown in underline/strikeout in the FEIR.