California Public Utilities Commission

# S-238 Hinkley Compressor Station Electrical Upgrades Project

# Final Initial Study/Mitigated Negative Declaration

**December 2025**

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PANORAMA ENVIRONMENTAL, INC.

California Public Utilities Commission

# S-238 Hinkley Compressor Station Electrical Upgrades Project

# Final Initial Study/Mitigated Negative Declaration

**January 2026**

**Prepared for:**

California Public Utilities Commission

300 Capitol Mall

Sacramento, CA 95814

**Prepared by:**

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PANORAMA ENVIRONMENTAL, INC.

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# Acronyms and Abbreviations

| | |
|---|---|
| APMs | Applicant Proposed Measures |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| CNDDB | California Natural Diversity Database |
| CPUC | California Public Utilities Commission |
| CRWQCB | Central Valley Regional Water Quality Control Board |
| GHG | Greenhouse Gas |
| IS | Initial Study |
| ITP | Incidental; Take Permit |
| LRWQCB | Lahontan Regional Water Quality Control Board |
| MCC | Motor Control |
| MND | Mitigated Negative Declaration |
| NOC | Notice of Completion |
| NOI | Notice of Intent |
| PEA | Proponent's Environmental Assessment |
| PERP | Portable Equipment Registration Program |
| PG&E | Pacific Gas & Electric |
| Proposed Project | S-238 Hinkley Compressor Station Electrical Upgrade Project |
| SCH | State Clearinghouse |
| YSMN | Yuhaaviatam of San Manuel Nation Cultural Resources Department |

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PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

# ~~DRAFT~~ FINAL

# Mitigated Negative Declaration

## PACIFIC GAS AND ELECTRIC

## S-238 HINKLEY COMPRESSOR STATION ELECTRICAL UPGRADES PROJECT

## APPLICATION NO. A.25-04-004

## Project Information

| | |
|---|---|
| **Title:** | S-238 Hinkley Compressor Station Electrical Upgrades Project |
| **Location:** | San Bernardino County, California |
| **Lead Agency Contact:** | John Edward Forsythe, Senior Project Manager (P5), Energy Division<br>California Public Utilities Commission<br>Energy Division<br>505 Van Ness Avenue, 4th Floor<br>San Francisco, California 94102<br>John.Forsythe@cpuc.ca.gov |
| **Applicant Contacts:** | Erin Rice<br>Senior Land Planner<br>Pacific Gas & Electric Company<br>925-724-9378<br>E-mail: E1RJ@PGE.com |

## Introduction

Pursuant to California Public Utilities Commission (CPUC) General Order 131-E, Pacific Gas & Electric (PG&E) filed an application (A.25-04-004) with the CPUC on April 9, 2025, for a Permit to Construct the S-238 Hinkley Compressor Station Electrical Upgrade Project (Proposed Project).

Pursuant to CEQA (California Public Resources Code § 21000 et seq.) the CPUC must prepare determine if any significant adverse effects on the environment would result from the Proposed Project implementation. An Initial Study (IS) was prepared by the CPUC using the significance criteria outlined in Appendix G of the State CEQA Guidelines (14 CCR § 15000 et seq.). According to CEQA Guidelines Article 6 (Negative Declaration Process) and section 15070 (Decision to Prepare a Negative Declaration or Mitigated Negative Declaration), a public agency shall prepare, or have prepared a proposed negative declaration or mitigated negative declaration (MND) for a project subject to CEQA when:

*(a) The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment; or*

*(b) The Initial Study identifies potentially significant effects, but:*

*(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review, would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and*

*(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.*

Based on the analysis in the IS, it has been determined that all project-related environmental impacts could be reduced to a less-than-significant level with the incorporation of minor revisions to the Proposed Project and feasible mitigation measures (MMs), which PG&E has agreed to implement should CPUC approve the project. Therefore, adoption of an MND will satisfy the requirements of CEQA. Applicant proposed measures (APMs) identified in PG&E's PEA, as revised in coordination with CPUC, and MMs included in this MND are designed to reduce or eliminate the potentially significant environmental impacts described in the IS. The analysis in the IS explains when a measure described in this document has been incorporated into the project, as a specific project design feature, APM, or MM. MMs are structured in accordance with the criteria in CEQA Guidelines section 15370.

## Project Description

The Proposed Project would be in San Bernadino County at PG&E's Hinkley Compressor Station and would involve replacing and upgrading existing electrical distribution equipment

by removing and replacing the station's switchgear, motor control (MCC), and a load center would be replaced or modified and connecting conduit and new or replacement cable would be installed between the switchgear and MCC locations. No new sub transmission lines or substations would be constructed as part of the Proposed Project. PG&E's stated objectives of the Proposed Project are to ensure compliance with CPUC G.O. 95 standards and address reliability concerns related to the condition of the compressor station. Construction of the Proposed Project is preliminarily scheduled to begin in 2026. The construction start date would depend on CPUC approval and construction would last approximately 23 months.

## Environmental Determination

The CPUC prepared this IS to determine if the Proposed Project would result in any significant adverse effects on the environment. The analysis presented in the IS is based on the significance criteria in Appendix G of the CEQA Guidelines. The IS relies on information in PG&E's Application filed on April 9, 2025; PG&E's responses to deficiency reports and data requests; the CPUC's independent analysis; and other environmental analyses.

PG&E's PEA identified APMs to address potentially significant impacts, and these APMs are considered to be part of the Proposed Project. Based on the IS analysis, additional MMs are identified for adoption to ensure that impacts of the Proposed Project would be less than significant. The additional MMs supplement the APMs. PG&E has agreed to implement all the MMs as part of the Proposed Project. Implementation of the MMs below would either avoid potentially significant impacts identified in the IS or reduce them to less-than-significant levels.

A Mitigation Monitoring and Reporting Program (MMRP), included in ~~Section 4~~ Appendix C of the Final IS/MND, has been prepared to ensure that the APMs and MMs are properly implemented. The plan describes specific actions required to implement each measure, including information on the timing of implementation and performance standards. Following project approval, CPUC would prepare and implement a Mitigation Monitoring, Compliance, and Reporting Program to ensure compliance with MMs and that the Proposed Project is implemented as stated in the CPUC-approved Project Description and the adopted MMRP.

## Mitigation Measures

### Biological Resources

**Mitigation Measure BIO ~~Bio~~-1: Desert Tortoise and Mohave Ground Squirrel**
Preconstruction clearance surveys for any burrows potentially containing desert tortoise or Mohave ground squirrel burrows shall be completed by a qualified biologist within 500 feet ~~meters (approximately 1,600 feet)~~ of the project footprint prior to the onset of construction activities. If the burrow has any sign of recent use by a desert tortoise or Mohave ground squirrel, the burrow shall be monitored by a qualified biologist for signs of activity. No construction activity shall be allowed within 200 feet ~~meters (approximately 656 feet)~~ of a

burrow containing desert tortoise or Mohave ground squirrel without obtaining approval from CDFW. All project activities within 500 feet ~~meters (approximately 1,600 feet)~~ of an occupied desert tortoise or Mohave ground squirrel burrow shall be monitored by a qualified biologist to ensure avoidance of the species.

**Mitigation Measure BIO ~~Bio~~ -2: Desert Kit Fox**

If an active, non-natal den is detected within the project footprint, then a 100-foot ~~50 meters (approximately 165 feet)~~ construction exclusion zone will be established, and passive relocation techniques may be used as determined by the qualified biologist. The buffer area will be maintained until passive relocation is successfully completed. If an active natal den is detected within the project footprint a 500-foot ~~meters (approximately 656 feet)~~ construction exclusion zone will be established, and passive relocation will not be implemented until monitoring confirms that the den is no longer in active use as a natal den.

**Mitigation Measure BIO ~~Bio~~ -3: Burrowing Owl**

Preconstruction clearance surveys for active burrowing owl burrows shall be completed by a qualified biologist prior to the onset of construction activities to minimize impacts from construction. Surveys shall be conducted according to CDFW guidelines (California Department of Fish and Game (CDFG) 2012) or updated guidelines should they become available). If burrows are located, avoidance buffers shall be determined in coordination with CDFW and based on the recommendations below:

- From April 1-August 15, buffers shall be 200 meters (approximately 656 feet) for low levels of disturbance (i.e., vehicles, worker presence), and 500 meters (approximately 1,600 feet) for moderate to high levels of disturbance (i.e., trenching, demolition, etc.)
- From August 16-October 15, buffers shall be 200 meters (approximately 656 feet) for low and moderate levels of disturbance and 500 meters (approximately 1,600 feet) for high levels of disturbance.
- From October 16-March 31, buffers shall be 50 meters (approximately 165 feet) for low levels of disturbance; be 200 meters (approximately 656 feet) for moderate levels of disturbance, and 500 meters (approximately 1,600 feet) for high levels of disturbance.
- Binocular surveys may be substituted for protocol field surveys on private lands adjacent to the project site only when PG&E has made reasonable attempts to obtain permission to enter the property for survey work but was unable to obtain such permission.

Reduced buffers may be requested by the qualified biologist due to existing noise and disturbance levels at the compressor station. Buffer reductions would require CDFW approval. No burrowing owl may be relocated without first obtaining a CDFW incidental take permit.

**Mitigation Measure BIO ~~Bio~~-4: Invasive Species**

Any ground- or vegetation-disturbing equipment and tools will be cleaned free of mud, soil, and plant material before entering the project site, and any time after driving off pavement

outside the project site. Cleaning can be through car washes, compressed air, pressure washes, brushes, or similar equipment.

## Cultural Resources

**Mitigation Measure Cultural-1: Archaeological Monitoring**
During trenching and excavation activities in soil or sediment that is not imported or not previously disturbed, a tribal monitor from one tribe to be identified by the lead agency, shall be invited to be retained by PG&E to inspect for potential archaeological deposits or Tribal cultural resources. In the event of the discovery of archaeological deposits or Tribal cultural resources a tribal representative shall have the authority to halt work within 100 feet of the discovery, and CPUC shall be notified within 48 hours of the discovery. All procedures in APM CUL-2 shall be implemented during investigation of the resource.

**Mitigation Measure Cultural-2: Inadvertent Cultural Resource Discoveries (Supersedes APM CUL-2)**

- If unanticipated cultural resources are identified during construction, the following procedures will be initiated:
- All ground-disturbing construction activities within 100 feet of the discovery will halt immediately.
- A qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find.
- The construction crew will protect the discovery from further disturbance until a qualified archaeologist has assessed it.
- The construction supervisor will immediately contact the project environmental inspector and the PG&E cultural resource specialist.

Work on the other portions of the project outside of the buffered area may continue during this assessment period. The PG&E cultural resources specialist will coordinate with the CPUC and NAHC, as appropriate. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Tribal input will be provided within 10 days. If the discovery can be avoided or protected and no further impacts will occur, then the resource will be documented on DPR 523 forms, and no further effort will be required. If the resource cannot be avoided and may be subjected to further impacts, qualified personnel will evaluate the significance of the discovery in accordance with the state laws outlined previously; personnel will implement data recovery or other appropriate treatment measures, if warranted. A qualified historical archaeologist will complete an evaluation of historic period resources, while evaluation of precontact resources will be completed by a qualified archaeologist specializing in California prehistoric archaeology.

Evaluations may include archival research, oral interviews, and/or field excavations to determine the full depth, extent, nature, and integrity of the deposit.

If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, a Cultural Resource Monitoring and Treatment Plan shall be prepared by the archaeologist in coordination with YSMN, and all subsequent finds shall be subject to the Cultural Resource Monitoring and Treatment Plan. The Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project ground disturbing activities, should YSMN elect to place a monitor on-site.

## Findings

The IS was prepared to identify the potential impacts on the environment from construction and operation of the PG&E S-238 Hinkley Compressor Station Electrical Upgrades Project and to evaluate the significance of these impacts. Based on the IS and the Findings listed below, the Lead Agency (CPUC) has determined that the Proposed Project would not have a significant effect on the environment.

- With the implementation of the incorporated APMs and MMs, the Proposed Project would not significantly degrade the quality of the environment.
- With the implementation of the above MMs, both short-term and long-term environmental impacts associated with the Proposed Project would be less than significant.
- When potential impacts associated with implementing the proposed project are considered cumulatively, the incremental contribution of the project-related impacts is insignificant.
- Based on the IS, there is no evidence that implementing the Proposed Project would have significant impacts on people.

John Edward Forsythe
Energy Division
California Public Utilities Commission

Date

# 1 Introduction

## 1.1 CEQA Process

Pursuant to the California Environmental Quality Act (CEQA), the California Public Utilities Commission (CPUC) prepared an Initial Study (IS) to evaluate the potential impacts of the Pacific Gas & Electric (PG&E) application for a Permit to Construct the S-238 Hinkley Compressor Station Electrical Upgrade Project (A.25-04-004) (Proposed Project). The IS determined that the Proposed Project would not have a significant impact on the environment, and the CPUC prepared a Draft Mitigated Negative Declaration (Draft MND).

This Final IS/MND has been prepared pursuant to CEQA and the CEQA Guidelines,[1] which outline all aspects of the preparation of the Draft IS/MND and its review as well as the subsequent steps to preparing a Notice of Determination. This document incorporates comments received during the public review period and contains responses by the Lead Agency (CPUC) to those comments in Chapter 2 Comments and Responses. The comments received resulted in minor changes to the IS contained in the Draft IS/MND, and some additional minor changes were made to improve the clarity of the Draft IS/MND. Those changes are reflected in Chapter 3, Revisions to the IS/MND. Changes are shown using underline to denote new language and ~~strikethrough~~ to denote deleted language. The Final IS/MND provides corrections and clarification to certain facts set forth in the Draft IS/MND and, where necessary, ensures accuracy. No new significant environmental impacts are identified in this Final IS/MND.

The Final IS/MND is an informational document prepared by the CPUC to be considered by decision makers before approving or denying the Proposed Project. The Final IS/MND includes the following:

- A list of agencies and organizations that commented on the IS/MND
- Comments received on the IS/MND including responses to comments
- Revisions to the Draft IS/MND
- Mitigation Monitoring and Reporting Plan

## 1.2 Public Review Process

On October 22, 2025, the CPUC filed a Notice of Completion (NOC) with the Governor's Office of Land Use and Climate Innovation (State Clearinghouse, SCH# 2025100950), published a

[1] Public Resources Code section 21000 et seq.; Title 14, California Code of Regulations, chapter 3, sections 15000 through 15387 and Appendices, accessible at http://opr.ca.gov/ceqa/.

Notice of Intent (NOI) to Adopt a MND, and released the Draft IS/MND for a 30-day public review period. The Draft IS/MND was distributed to federal, State, and local agency representatives, and the NOI was distributed to property owners within 1,000 feet of the Project. A legal notice was published on October 15, 2025, in *The Sun* (San Bernardino), a newspaper of general circulation in the project area, announcing the availability of the Draft IS/MND for public review in compliance with CEQA (Appendix A). On October 9, 2025, the CPUC filed a notice of intent (NOI) to adopt an MND with the San Bernardino County Clerk (Appendix A).

While public notices were mailed on October 9, 2025, the public review and comment period ended on November 21, 2025, based on the filing of the NOI with the State Clearinghouse on October 22, 2025. The CPUC established a Project email address (hinkleyelectrical@panoramaenv.com) and Project website (https://ia.cpuc.ca.gov/environment/info/panoramaenv/Hinkley/index.html) to enable the public to ask questions, provide comments, and obtain additional information on the Project analyzed in the Draft IS/MND. Copies of all written comments received on the Draft IS/MND are provided in Chapter 2 of this Final IS/MND

## 1.3 Summary of Impact Conclusions

Based on the analysis conducted in this Final IS/MND, the CPUC has found, on the basis of the whole record before it (including all Project application materials, the Draft IS/MND, comments received, and other materials), that there is no substantial evidence that the Project would have a potential significant environmental impact. Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. Argument, speculation, and unsubstantiated opinion or narrative does not constitute substantial evidence (Pub. Res. Code § 21080(e); CEQA Guidelines § 15064(f)(5)). Project features and mitigation measures identified in the Final IS/MND to be required as a condition of certification of approval for the proposed Project would avoid or reduce all impacts to a less-than-significant level.

## 1.4 Document Organization

This Final IS/MND is organized as follows:

- Chapter 1 Introduction. This chapter provide an introduction to the Final IS/MND and public review process.
- Chapter 2 Comments and Responses to Comments. This chapter presents comments received on the Draft IS/MND and responses to those comments.
- Chapter 3 Revisions to the IS/MND. This chapter presents revisions to the IS/MND based on comments received during the public review period.

# 2 Comments and Responses

## 2.1 Comments on the Draft MND

The CPUC received two comment letters on the Draft IS/MND for the proposed S-238 Hinkley Compressor Station Electrical Upgrade Project (Project), Application A.25-04-004. The CPUC has considered all comments and provides responses to all comments in this document.

## 2.2 List of Commenters and Summary of Comments

Table 1 lists the agencies and commenters on the Draft MND. Comment letters are presented in the order received. The comment letters and comment responses are included in Section 2.3, below. Each comment letter is followed by the corresponding responses.

**Table 1 Commenters on the Draft IS/MND and Corresponding Comment and Response Numbers**

| Comment letter designation | Date of letter | Commenter | Agency/organization | Response numbers |
|---|---|---|---|---|
| **Applicant** | | | | |
| A.1 | 11/8/2025 | Erin Rice | PG&E | A.1-1 through A.1-86 |
| **Tribal Governments** | | | | |
| B.1 | 11/21/2025 | Kristen Tuosto | Yuhaaviatam of San Manuel Nation | B.1-1 through B.1-5 |

## 2.3 Responses to Comments

This section contains responses to all substantive comments received on the IS/MND during the public review period from October 22, 2025, through November 22, 2025. Each substantive comment was assigned a comment number (e.g., A.1-1, A.1-2, etc.). The comments received resulted in revisions to the IS/MND, as addressed in chapter 3 of this Final IS/MND.

### 2.3.1 Applicant

PG&E comments on the IS/MND are provided below and followed by individual responses to each comment.

PG&E S-238 Hinkley Compressor Station Electrical Upgrades Project
PG&E Comments on Draft Initial Study / Mitigated Negative Declaration
**Attachment 1: Text Revisions and Requests for Clarification**

| Page | Draft IS/MND Language | Comments |
|---|---|---|
| Global | | |
| | PG&E's APMs | Almost all of PG&E's APMs were edited where included in the Draft IS/MND locations. Substantive changes are included in the subsequent comments; however, all edits should be removed and the exact text proposed by PG&E in its Project PEA should be used consistently in the IS/MND. |
| Draft Initial Study / Mitigated Negative Declaration Summary | | |
| MND-3 | PG&E's stated objectives of the Proposed Project are to ensure compliance with CPUC G.O. 95 standards and address reliability concerns related to the condition of the compressor station. | PG&E's objectives stated in the PEA are:<br>• Modernize the compressor station's electrical distribution system by replacing obsolete equipment in alignment with current PG&E and industry standards.<br>• Enable the use of efficient, standardized training and operational and safety procedures without de-energizing the equipment or requiring higher rated arc flash personal protective equipment (PPE).<br>• Reduce the risk of unplanned compressor station failure or shut down by 2028, or as soon as feasible.<br>• Maintain existing compressor station operations during Project construction.<br><br>CPUC G.O. 95 is not include in a PG&E project objective because the project does not include electric power lines. CPUC G.O. 95 was mentioned in PEA Section 5.9.2.4 Touch Thresholds, *Although electric power lines will not be disturbed during project activities, in the event it is necessary, all electric power lines will be designed in accordance with CPUC GO 95 guidelines for safe ground clearances established to protect the public from electric shock.*<br><br>*Suggested clarification*:<br><br>PG&E's stated objectives of the Proposed Project are to align with current PG&E and industry ~~ensure compliance with CPUC G.O. 95~~ standards and address safety and reliability concerns related to the condition of the compressor station. |

A.1-1

A.1-2

PG&E S-238 Hinkley Compressor Station Electrical Upgrades Project
PG&E Comments on Draft Initial Study / Mitigated Negative Declaration
**Attachment 1: Text Revisions and Requests for Clarification**

| Page | Draft IS/MND Language | Comments | |
|---|---|---|---|
| MND-3 | The IS relies on information in PG&E's Application filed on April 9, 2025; PG&E's responses to deficiency reports and data requests; the CPUC's independent analysis; and other environmental analyses. | CPUC issued no deficiency reports to PG&E. *Suggested clarification*: The IS relies on information in PG&E's Application filed on April 9, 2025; PG&E's responses to ~~deficiency reports and~~ data requests; the CPUC's independent analysis; and other environmental analyses. | A.1-3 |
| MND-3 | Mitigation Measure BIO-1: Desert Tortoise and Mohave Ground Squirrel<br>Preconstruction clearance surveys for any burrows potentially containing desert tortoise or Mohave ground squirrel burrows shall be completed by a qualified biologist within 500 meters (approximately 1,600 feet) of the project footprint prior to the onset of construction activities. If the burrow has any sign of recent use by a desert tortoise or Mohave ground squirrel, the burrow shall be monitored by a qualified biologist for signs of activity. No construction activity shall be allowed within 200 meters (approximately 656 feet) of a burrow containing desert tortoise or Mohave ground squirrel without obtaining approval from CDFW. All activities within 500 meters (approximately 1,600 feet) of an occupied desert tortoise or Mohave ground squirrel burrow shall be monitored by a qualified biologist to ensure avoidance of the species. | Preconstruction surveys for desert tortoise and Mohave ground squirrel typically require only a 50-foot buffer from the project area. PG&E's Southern California Desert Gas Pipeline Operation and Maintenance Activities Section 2081 ITP requires a 50-foot buffer from the Covered Activity for pre-activity surveys. Also, it is standard to see a 50-foot buffer required from the project area for visual surveys for Mohave ground squirrel. The 500-foot buffer for preconstruction clearance surveys for potential burrows was nearing excessive but PG&E agreed during an administrative review in an effort to expedite project approval and CPUC's comfort for full avoidance of any potential take for listed species. To include a buffer more than 500 feet is beyond excessive for a project that is not impacting any habitat, is upgrading existing facilities on a 50-year plus active compressor station that is completely enclosed with chain link fencing.<br><br>Suggest that the previously discussed preconstruction survey buffer of 500-feet, the 200-foot construction free zone buffer for burrows with signs of activity or live desert tortoise or Mohave ground squirrel, and monitoring of any active burrow within 500' of construction activities remain and the new distances be removed. *Suggest the following changes:*<br><br>Mitigation Measure BIO-1: Desert Tortoise and Mohave Ground Squirrel<br>Preconstruction clearance surveys for any burrows potentially containing desert tortoise or Mohave ground squirrel burrows shall be completed by a qualified biologist within 500 <u>feet</u> ~~meters (approximately 1,600 feet)~~ of the project footprint prior to the onset of construction activities. If the burrow has any sign of recent use by a desert tortoise or Mohave ground squirrel, the burrow shall be monitored by a qualified biologist for signs of | A.1-4 |

PG&E S-238 Hinkley Compressor Station Electrical Upgrades Project
PG&E Comments on Draft Initial Study / Mitigated Negative Declaration
**Attachment 1: Text Revisions and Requests for Clarification**

| Page | Draft IS/MND Language | Comments | |
|---|---|---|---|
| | | activity. No construction activity shall be allowed within 200 feet ~~meters (approximately 656 feet)~~ of a burrow containing desert tortoise or Mohave ground squirrel without obtaining approval from CDFW. All project activities within 500 feet ~~meters (approximately 1,600 feet)~~ of an occupied desert tortoise or Mohave ground squirrel burrow shall be monitored by a qualified biologist to ensure avoidance of the species. | A.1-4 |
| MND-4 | Mitigation Measure BIO-2: Desert Kit Fox<br><br>If an active, non-natal den is detected within the project footprint, then a 50 meters (approximately 165 feet) construction exclusion zone will be established, and passive relocation techniques may be used as determined by the qualified biologist. The buffer area will be maintained until passive relocation is successfully completed. If an active natal den is detected within the project footprint a 200 meters (approximately 656 feet) construction exclusion zone will be established, and passive relocation will not be implemented until monitoring confirms that the den is no longer in active use as a natal den. | The CEQA document for PG&E's O&M Gas Pipeline 2081, referenced above, requires 100-foot disturbance-free buffer zone for desert kit fox non-natal if possible and 500-foot disturbance free buffer around natal dens.<br><br>*Suggest the following changes:*<br>Mitigation Measure BIO-2: Desert Kit Fox<br><br>If an active, non-natal den is detected within the project footprint, then a 100 feet ~~50 meters (approximately 165 feet)~~ construction exclusion zone will be established, and passive relocation techniques may be used as determined by the qualified biologist. The buffer area will be maintained until passive relocation is successfully completed. If an active natal den is detected within the project footprint a 500 feet ~~meters (approximately 656 feet)~~ construction exclusion zone will be established, and passive relocation will not be implemented until monitoring confirms that the den is no longer in active use as a natal den. | A.1-5 |
| Chapter 2 – Project Description | | | |
| 2-1 | The Project site consists of the 64-acre fenced compressor station, within which the Project would include would be implemented in a 15.8-acre work area and a 9.7-acre staging area (Figure 2-2 and Figure 2-3). | *Suggested clarification:* The Project site consists of the 64-acre fenced compressor station, within which the Project ~~would include~~ would be implemented in a 15.8-acre work area and a 9.7-acre staging area (Figure 2-2 and Figure 2-3). | A.1-6 |
| 2-7 | **2.6.1 Site Preparation** | PG&E's PEA Project Description does not include grading or site stabilization that are included when discussing associated impacts in Chapter 3 resource sections. Please updated impact sections to reflect the clarified project description. | A.1-7 |

PG&E S-238 Hinkley Compressor Station Electrical Upgrades Project
PG&E Comments on Draft Initial Study / Mitigated Negative Declaration
**Attachment 1: Text Revisions and Requests for Clarification**

| Page | Draft IS/MND Language | Comments | |
|---|---|---|---|
| | | *Suggested clarification to Chapter 2, add statement*: Site preparation does not include grading or other site stabilization activities to prepare construction work areas. | A.1-7 |
| 2-7 | **2.6.1 Site Preparation**<br>**Surveying and Staking**<br>The Project site would be surveyed to locate and identify new underground conduit locations and the MCC-9 location, using paint on the ground or installing horizonal and vertical stakes. Typical surveying and staking techniques and hand equipment would be used. PG&E also would clearly mark any sensitive biological, cultural, paleontological, or hydrological resources, where appropriate, to prevent construction activities and equipment from entering those areas per the requirements of applicant proposed measures (APMs) and any required mitigation measures. | Currently, there are no known sensitive biological, cultural, paleontological, or hydrological resources within the project construction or staging areas. *Suggested clarification:* PG&E also would clearly mark any sensitive biological, cultural, paleontological, or hydrological resources identified during pre-construction surveys or monitoring during construction, where appropriate, to prevent construction activities and equipment from entering those areas per the requirements of applicant proposed measures (APMs) and any required mitigation measures. | A.1-8 |
| 2-8 | **2.6.2 Temporary Construction Staging**<br><br>The soil in the staging area would be compacted. | PG&E's PEA Project Description does not include compacting soil in the construction staging area, which is an existing station staging area. *Correction requested:* ~~The soil in the staging area would be compacted.~~ | A.1-9 |
| 2-8 | **2.6.3 Temporary Power Setup**<br><br>Transitioning between permanent and temporary power, as well as disconnecting equipment for replacement, would follow strict safety protocols, including lockout and tagout procedures and operational clearances. | Industry safety protocols are not described with adjectives. *Correction requested:* Transitioning between permanent and temporary power, as well as disconnecting equipment for replacement, would follow ~~strict~~ safety protocols, including lockout and tagout procedures and operational clearances. | A.1-10 |
| 2-11 | **2.6.12 Hazardous Materials and Management**<br><br>Hazardous materials, such as fuels, lubricants, cleaning solvents, and other chemicals would not be stored on site, and all fueling and storage would occur off-site. Fuel, grease, and fluids that would be needed for construction equipment operations would be on site periodically; these would be handled in keeping with the Project's APMs and BMPs that address their proper use, storage, and cleanup, if warranted. | PEA Section 3.5.10.1 and 3.5.10.2 of the PEA state that the existing natural gas within the station will be used to fuel the temporary PERP generators. *Correction requested:* Hazardous materials, such as fuels, lubricants, cleaning solvents, and other chemicals would not be stored on site, and all fueling and storage would occur off-site. Natural gas from within the station will be used to fuel the temporary PERP generators. Fuel, grease, and fluids that would be needed for construction equipment operations would be on site periodically; these would be handled in keeping with the Project's APMs and BMPs that address their proper use, storage, and cleanup, if warranted. | A.1-11 |
| 2-15 | **Construction Traffic** | It is possible that commutes may occur in rental or company vehicles. *Correction requested:* Construction crews (worker | A.1-12 |

PG&E S-238 Hinkley Compressor Station Electrical Upgrades Project
PG&E Comments on Draft Initial Study / Mitigated Negative Declaration
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| Page | Draft IS/MND Language | Comments | |
|---|---|---|---|
| | Construction crews (worker commutes) would travel to and from the Project site via personal vehicles and light-duty trucks. | commutes) would travel to and from the Project site via ~~personal~~ light-duty vehicles ~~and light-duty~~ or trucks. | A.1-12 |
| 2-17 | **APM AIR-1: Dust Control during Construction**<br>PG&E will control fugitive dust by using the following BMPs:<br>• Water or cover all exposed surfaces with the potential to generate dust with coarse rock, to reduce the potential for airborne dust to leave the Project site.<br>• Limit the simultaneous occurrence of more than two ground-disturbing construction phases on the same area at any one time. Phase activities to reduce the amount of disturbed surfaces at any one time.<br>• Cover all haul trucks entering/leaving the site and trim their loads, as necessary.<br>• Use wet power vacuum street sweepers to sweep all paved access roads, parking areas, staging areas, and public roads adjacent to the Project site daily (at minimum) during construction. Do not use dry power sweeping.<br>• Wash off all trucks and equipment, including their tires, before they leave the Project site.<br>• Apply gravel or non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas on the Project site.<br>• Water and/or cover soil stockpiles daily.<br>• Plant vegetative ground cover in disturbed areas as soon as possible, and water it appropriately until the vegetation is established.<br>• Limit all vehicle speeds to 15 miles per hour (mph) or less on unpaved areas.<br>• Implement dust monitoring in compliance with the standards of the MDAQMD.<br>• Halt construction during any periods when wind speeds exceed 50 mph. | This APM is edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of PG&E's proposed measure. *Correction requested:*<br><br>**APM AIR-1: Dust Control During Construction**<br>PG&E will control fugitive dust by using BMPs, as follows:<br>• Water or cover with coarse rock all exposed surfaces with the potential to generate dust to reduce the potential for airborne dust from leaving the site.<br>• Limit the simultaneous occurrence of more than two ground-disturbing construction phases on the same area at any one time. Phase activities to reduce the amount of disturbed surfaces at any one time.<br>• Cover all haul trucks entering/leaving the site and trim their loads, as necessary.<br>• Use wet power vacuum street sweepers to sweep all paved access roads, parking areas, staging areas, and public roads adjacent to the project site daily (at minimum) during construction. Do not use dry power sweeping<br>• Wash off all trucks and equipment, including their tires, prior to leaving the project site.<br>• Apply gravel or non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas at the project site.<br>• Water and/or cover soil stockpiles daily.<br>• Plant vegetative ground cover in disturbed areas as soon as possible and water it appropriately until vegetation is established.<br>• Limit all vehicle speeds to 15 miles per hour (mph) or less on unpaved areas.<br>• Implement dust monitoring in compliance with the standards of MDAQMD.<br>• Halt construction during any periods when wind speeds exceed 50 mph. | A.1-13 |

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| 2-18 | **APM BIO-1: Protect Nesting Birds**<br><br>For any construction scheduled during the typical migratory bird or raptor nesting season (March 1 through August 15), preconstruction migratory bird and raptor nesting surveys would be performed by a qualified biologist. Surveys would occur in publicly accessible areas and/or where PG&E has existing access. Private property would not be used for access. If active nests containing eggs or young are found, an appropriate nest exclusion zone would be established to prevent disturbance to the nest. Migratory bird and raptor nesting preconstruction surveys and avoidance measures would be performed in accordance with PG&E's Nesting Bird Management Plan. | This APM is edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of PG&E's proposed measure. *Correction requested:*<br><br>**APM BIO-1: Protect nesting birds**<br>If construction is to occur during the avian nesting season (March 1 through August 15), a preconstruction migratory bird and raptor nesting survey will be performed by a qualified biologist who is familiar with local avian species and nesting birds. Surveys will occur only in publicly accessible areas and areas where PG&E has existing access; private property will not be accessed and will instead be observed from adjacent accessible areas.<br><br>Preconstruction nesting bird surveys will be performed in accordance with PG&E's Nesting Bird Management Plan. The preconstruction survey will cover a radius of 200 feet for nonlisted raptors and 100 feet for nonlisted passerines from project locations that will be actively worked at in the near term. The survey will cover all affected areas where ground disturbance is required. If any active nests containing eggs or young are found, an appropriate nest exclusion zone will be established by the PG&E biologist in accordance with PG&E's Nesting Bird Management Plan. No heavy equipment will be operated in this exclusion zone until the biologist has determined that the nest is no longer active, and the young have fledged. If it is not practicable to avoid work in an exclusion zone around an active nest, work activities will be modified to minimize disturbance of nesting birds but may proceed in these zones at the discretion of the biologist. As appropriate, the biologist will monitor work activities in these zones daily or periodically when construction is occurring and assess their effect on the nesting birds. If the biologist determines that particular activities pose a high risk of disturbing an active nest, the biologist will recommend additional, feasible measures to minimize the risk of nest disturbance. If work cannot proceed without disturbing the nesting birds, or signs of disturbance are observed by the monitor, work may need to be halted or redirected to other areas |

A.1-14

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| | | until the nesting and fledging is completed or the nest has otherwise failed for reasons not related to construction. | A.1-14 |
| 2-18 | **APM BIO-2: Protect Wildlife Trapped in Trenches or Steep-walled holes**<br>All excavated holes/trenches that are not filled at the end of a workday would be covered, or a wildlife escape ramp would be installed to prevent the inadvertent entrapment of wildlife species. Excavated holes/trenches left overnight would be inspected prior to the onset of work. If wildlife is found, work would pause until the PG&E biologist is able to remove and relocate the animal. | This APM is edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of PG&E's proposed measure. *Correction requested:*<br><br>**APM BIO-2: Protect wildlife trapped in trenches or steep-walled holes**<br>Field crews will fit open trenches or steep-walled holes with escape ramps of plywood boards or sloped earthen ramps at each end if left open overnight. Field crews will search open trenches or steep-walled holes every morning prior to initiating daily activities to ensure wildlife is not trapped. If any wildlife is found, work will stop, and the PG&E biologist will be contacted to move the animal out of harm's way. | A.1-15 |
| 2-18 | **APM BIO-3: Preconstruction Surveys**<br>Preconstruction biological clearance surveys would be completed by a qualified biologist prior to the onset of construction activities to minimize impacts on wildlife. | This APM is edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of PG&E's proposed measure. *Correction requested:*<br><br>**APM BIO-3 Preconstruction Surveys**<br>Preconstruction biological clearance surveys will be completed by a qualified biologist prior to construction activities beginning and will occur throughout the project site to minimize impacts on wildlife. | A.1-16 |
| 2-18 | **APM BIO-4. Worker Environmental Awareness Program – Biological Resources Portion**<br>A Worker Environmental Awareness Program (WEAP) would be prepared for the project and implemented to educate construction and O&M workers on site-specific biological and non-biological resources and proper work practices to avoid harming wildlife during construction or O&M. The WEAP would include training which addresses the requirements for protecting wildlife from entrapment in open trenches or steep-walled holes and nesting birds. A copy of the training sign-in sheets would be provided to the CPUC. | This APM is edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of PG&E's proposed measure. *Correction requested:*<br><br>**APM BIO-4. Worker Environmental Awareness Program – Biological Resources Portion**<br>A worker environmental awareness program (WEAP) will be prepared for the project to communicate environmental issues and appropriate work practices specific to the project to all construction field personnel before they begin work on the project. A PG&E biologist or designee familiar with resources in the area will deliver the WEAP biological resources portion. | A.1-17 |

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| | | Training will include a discussion of the potential for nesting birds and possible buffers, along with the requirement to protect wildlife from becoming trapped in trenches or steep-walled holes. Training will include information about federal laws protecting nesting birds. A copy of the training sign-in sheets documenting participation in the training will be provided to the CPUC. | A.1-17 |
| 2-19 | **APM CUL-1: Worker Environmental Awareness Training Program, Cultural Resources Portion**<br>A worker environmental awareness training program (WEAP) will be prepared to communicate environmental issues and appropriate work practices specific to the Project to all construction field personnel before they begin work on the Project performing excavation or trenching activities. This training will be administered by a qualified cultural resource professional, either as a standalone training or as part of the overall environmental awareness training that will be required for the Project. This training may be recorded for use in subsequent training sessions. The WEAP will be provided separately to CPUC staff before the start of construction. The WEAP will address the following topics at a mimimum:<br>• A review of archaeology, history, precontact, and Native American cultures associated with historical resources in the Project vicinity<br>• A review of applicable local, State, and federal ordinances, laws, and regulations pertaining to historic preservation<br>• A discussion of procedures to be followed if unanticipated cultural resources are discovered during Project implementation<br>• A discussion of disciplinary action and other actions that can be taken against persons violating historic preservation laws and PG&E policies<br>• A statement by the construction company or applicable employer, agreeing to abide by the WEAP, PG&E policies, and other applicable laws and regulations. | This APM is edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of PG&E's proposed measure. *Correction requested:*<br><br>**APM CUL-1: Worker Environmental Awareness Training Program – Cultural Resources Portion**<br>A worker environmental awareness training program (WEAP) will be prepared to communicate environmental issues and appropriate work practices specific to the project to all construction field personnel before they begin work on the project performing excavation or trenching activities. This training will be administered by a qualified cultural resource professional either as a standalone training or as part of the overall environmental awareness training required by the project and may be recorded for use in subsequent training sessions. The WEAP program will be provided separately to CPUC staff prior to construction. The WEAP will address, among other topics, at a minimum:<br>• A review of archaeology, history, precontact, and Native American cultures associated with historical resources near the project<br>• A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation<br>• A discussion of procedures to be followed if unanticipated cultural resources are discovered during implementation of the project<br>• A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and PG&E policies | A.1-18 |

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| | | • A statement by the construction company or applicable employer agreeing to abide by the Worker Education Program, PG&E policies, and other applicable laws and regulations | A.1-18 |
| 2-21 | **APM PAL-4: Unanticipated Paleontological Discovery** | PG&E agrees with the typographical error correction in the last bullet point in APM PAL-4 that corrects "paleontological" to "paleontologist". | A.1-19 |
| Chapter 3 - Environmental Checklist and Discussion | | | |
| Aesthetics | | | |
| 3.1-7 | **Impact Question b): Would the Project substantially damage scenic resources, including trees, rock outcroppings, and historical buildings within a State scenic highway?**<br><br>SR 58, approximately 1 mile north of the Project site, is an eligible State Scenic Highway and is a San Bernardino County scenic route. Historic Route 66, approximately 4.96 miles to the southeast, is a County-designated scenic route, as well as a federally designated National Scenic Byway; however, the designated portion is outside the Project viewshed. Project construction temporarily would introduce heavy equipment to the Project site. As discussed above, this equipment would be visible from SR-58 for approximately 5 miles; however, the equipment would be hardly perceptible because it would be within the footprint of the compressor station, with a minimum height difference. The Project would remove the existing 8 to 8.5-foot-tall outdoor MCCs (MCC-2, MCC-3 and MCC-6) and install new MCCs that would be 10.5 feet tall, install one new MCC outdoors, and potentially remove the outdoor Auxiliary Load Center No. 1. All other Project components (e.g., electrical lines) would be buried underground or be within existing buildings and would not be visible during Project O&M. The Project would not remove any trees. The replacement of MCCs within the Hinkley Compressor Station with MCCs that would be 2 feet taller than existing ones would not significantly alter the overall appearance of equipment within the station when viewed from designated SR 58, because of the distance from the highway and limited change in conditions at the station. The MCCs that would be removed are not scenic buildings. The Project would not damage scenic resources within a State Scenic Highway or affect views from the SR-58 corridor or the Historic Route 66 corridor. The impact would be less than significant. No mitigation is required. | Refer to the photograph on the title page of the Draft IS/MND which presents a view from Fairview Road about a half block south of its intersection with Community Boulevard. This photo's location is at least 0.75 mile closer to the station than viewers on SR 58. The project construction area is behind the large station buildings. The project's outdoor equipment, MCCs and Auxiliary Load Center, are blocked from view by the large buildings. A two foot change to equipment that is not visible from SR 58 travelers will have no impact. *Correction requested*: As discussed above, this equipment would <u>not</u> be visible from SR-58 for approximately 5 miles; however, the equipment would be ~~hardly perceptible~~ <u>imperceptible</u> because it would be <u>behind large station building</u> within the footprint of the compressor station, with a minimum height difference. …<br>The replacement of MCCs within the Hinkley Compressor Station with MCCs that would be 2 feet taller than existing ones would not significantly alter the overall appearance of equipment within the station when viewed from designated SR 58, because of the distance from the highway and <u>the equipment not being in view.</u> ~~limited change in conditions at the station.~~<br><br>Additionally, while Historic Route 66 travelers would have a view of the construction area where equipment is being replaced, at highway speed, a 2-foot height difference is imperceptible at a 5-mile distance. | A.1-20 |

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| | | Finally, The MCCs are equipment cabinets, not even buildings.<br>*Correction requested:* ~~The MCCs that would be removed are not scenic buildings.~~<br><br>*Correction requested:* ~~The impact would be less than significant.~~ There would be no impact. | A.1-20 |
| 3.1-7 | **Impact Question c): In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the Project is in an urbanized area, would it conflict with applicable zoning and other regulations governing scenic quality?**<br><br>**Construction**<br>During construction, visual impacts would include the presence of workers, temporary generators, construction equipment, and vehicles associated with the station upgrades. Although the west side of the station is adjacent to a public roadway, the large station buildings and outdoor equipment either blocks or generally reduces the view of construction equipment from roadway users. Project construction is expected to take approximately 23 months, but most of the Project work, which would be performed by approximately 18 workers, would occur within buildings or enclosures. Because of the temporary nature of the construction activities and shielding of the construction area from public vantage points by existing infrastructure at the Hinkley Compressor Station, the impact would be less than significant. | The impact discussion omits the existing setting context of ongoing station operation, as well as the limited number of affected viewers are accustomed to existing station operation activities that will be indistinguishable from a public view. With this context added the conclusion of temporary construction-related visual effects, is no impact. Project construction will be imperceptible to the limited viewers accustomed to station operations.<br><br>*Correction requested:* … , ~~the impact would be less than significant.~~ … , there would be no impact. | A.1-21 |
| 3.1-9 | County of San Bernardino. 2025. "Circulation Elements - Overview." https://sbcounty.maps.arcgis.com/home/item.html?id=35d78b44c06340e08d8c55c3b9120265. | The link is inaccessible. | A.1-22 |
| Biological Resources | | | |
| 3.4-1 | 4.a) Less than Significant with Mitigation Incorporated | Should be less than significant because there isn't a significant impact. Comments to biological resource section, in-line with the PEA findings, support 'less than significant impact'. | A.1-23 |
| 3.4-2 | The study area for vegetation communities for the Project encompasses the Project site plus a 1,000-foot radius (vegetation study area). | *Suggested clarification to align with the PEA*: The study area for vegetation communities and land cover types for the Project encompasses the Project site plus a 1,000-foot radius (vegetation study area). | A.1-24 |

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| 3.4-2 | These data were refined during field surveys to better characterize vegetation communities and evaluate available habitat for special status species (Jacobs 2025). | *Suggested clarification to align with the reference*: These data were refined during field surveys to better characterize habitat ~~vegetation communities~~ and evaluate available habitat for special status species (Jacobs 2025). | A.1-25 |
| 3.4-2 | Meandering transect floristic surveys were conducted on April 15 and 16, 2024, to map any special status plant species present within or adjacent to the proposed work or staging areas. | *Suggested clarification to align with the paragraph header and terminology:*<br>Meandering botanical ~~transect~~ floristic surveys were conducted on April 15 and 16, 2024, to map any special status plant species present within or adjacent to the proposed work or staging areas. | A.1-26 |
| 3.4-2 | Wildlife surveys conducted for the project included focused surveys for Agassiz's desert tortoise, habitat and breeding season surveys for burrowing owl, and protocol-level surveys and trapping for Mohave ground squirrels. | *Suggested clarification to align with the referenced technical report*: Wildlife surveys conducted for the project included protocol-level ~~focused~~ surveys for Agassiz's desert tortoise, habitat and breeding season surveys for burrowing owl, and protocol-level surveys and trapping for Mohave ground squirrels. | A.1-27 |
| 3.4-2 | Wildlife Surveys | Habitat assessment occurred as well during the survey.<br>*Suggested addition to clarify:* During the April 12, 2024 reconnaissance field survey, biologists assessed habitat suitability for special status species known to occur within 5-miles of the project site. | A.1-28 |
| 3.4-2 | Observations of common plant and animal species were recorded concurrently with these surveys. | *Suggested clarification to reflect that the wildlife surveys were completed separately from each other*: Observations of common plant and animal species were included in ~~recorded concurrently with~~ the individual ~~these~~ survey reports. | A.1-29 |
| 3.4-2 | Focused presence-absence surveys for Agassiz's desert tortoise were conducted on April 12, 2024. | *Suggested clarification to align with the survey types and dates*: Protocol-level f~~F~~ocused presence-absence surveys for Agassiz's desert tortoise were conducted on March ~~April~~ 12 and March 13, 2024. | A.1-30 |
| 3.4-2 | Focused surveys included transects spaced at 10-meter (approximately 33 feet) intervals in all areas with unpaved surfaces inside the Hinkley Compressor Station fence line. | *Suggest clarification to correctly identify the survey protocol that was completed:* Focused surveys included transects spaced at 10-meter (approximately 33 feet) intervals in all areas with unpaved surfaces inside the Hinkley Compressor Station fence line. In addition, at the request of the CDFW, six zone-of-influence transects 100 feet apart from Hinkley Compressor Station to the east, north, west, and south were surveyed where possible. | A.1-31 |

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| 3.4-3 | Burrowing owl transects were also surveyed for evidence of desert tortoise. | *Suggest deleting as additional, clarifying comment regarding the protocol level surveys for desert tortoise above is adequate to describe these surveys.* | A.1-32 |
| 3.4-5 | The landscape within vegetation study area consists of a mix of agricultural areas, developed residential areas, and small private property holdings. | *Suggested clarification describing the landscape*: The landscape within vegetation study area consists of a mix of agricultural areas and~~,~~ developed ~~residential~~ industrial areas, and rural residential areas~~ small private property holdings~~. | A.1.33 |
| 3.4-5 | The surrounding area primarily consists of hardscaped or developed/landscaped agricultural land and ruderal or non-native species with some undeveloped desert scrub (Jacobs 2025; PG&E 2025). | *Suggested clarification*: The ~~surrounding~~ area surrounding the station primarily consists of hardscaped or developed/landscaped agricultural land and ruderal or non-native species with some undeveloped desert scrub (Jacobs 2025; PG&E 2025). | A.1-34 |
| 3.4-7 | Species with the possibility of occurring in the Project area are discussed below. | Species with the possibility of occurring in the ~~Project area~~ Biological Survey Area and the Botanical Survey Area are discussed below. | A.1-35 |
| 3.4-8 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area | This table appears to be a modification of Table 4 in the PEA Appendix B, Biological Resources Technical Report (BRTR) and plant species information from the BRTR's Rare Plant Survey Memorandum Table B. Table 4 outlines special status species with potential to occur in the Study Area not solely the Botanical Study Area. A portion of these species in Table 3.4-2 are wildlife, and don't relate to the Botanical Study Area.<br><br>*Suggested clarification*: Clarify what Study Area the Potential to Occur for each species is referencing, and whether it is the Botanical or Biological study area instead of blending the study areas together for all species included. Also, consider editing the table title to clarify that wildlife species were not only considered within the Botanical Study Area. | A.1-36 |
| 3.4-8 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area<br><br>Lane Mountain milk-vetch | This plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. Project area is denuded of any vegetation.<br><br>*Suggest clarification:* Unlikely. Suitable habitat is present within the buffer area only of botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of | A.1-37 |

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| | | the biological or botanical study areas. None encountered during field surveys. | A.1-37 |
| 3.4-8 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area<br><br>Desert cymopterus | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area.<br><br>*Suggest clarification:* Suitable habitat is present within the buffer area only of botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-38 |
| 3.4-8 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area<br><br>Mojave monkeyflower | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggest clarification:* Unlikely. Suitable habitat is present within the buffer area only of botanical study area and not the project area. One CNDDB occurrence recorded within 5 miles of the botanical study area reported in 1941. None encountered during field surveys. | A.1-39 |
| 3.4-9 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Mojave menodora \| Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggested clarification*: Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the buffer area only of botanical study area and not project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-40 |
| 3.4-9 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Spiny-hair blazing star\| Potential for Occurrence in Study Area \| Unlikely. Minimal marginal to low quality suitable habitat is present in the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggested clarification*: Potential for Occurrence in Study Area \| Unlikely. Minimal marginal to low quality suitable habitat is present in the buffer area of botanical study area and not project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-41 |
| 3.4-9 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Creamy blazing star \| Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the botanical study area. No CNDDB | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggested clarification*: Suitable habitat is present within the buffer area only of botanical study area and not | A.1-42 |

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| | occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-42 |
| 3.4-9 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Beaver dam breadfoot \| Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggested clarification*: Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the buffer areas only of botanical study area and not project area. ~~No~~ Two CNDDB occurrences ~~recorded~~ within 5 miles of the biological ~~or botanical~~ study area~~s~~ recorded prior to 1937. None encountered during field surveys. | A.1-43 |
| 3.4-9 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Parish's phacelia \| Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggested clarification*: Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the buffer areas of the botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-44 |
| 3.4-9 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| California alkali grass \| Potential for Occurrence in Study Area \| Unlikely. No suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | No information is provided as to why the species is not absent. *Suggested clarification to align with Potential summary in table*: Potential for Occurrence in Study Area \| Absent. ~~Unlikely.~~ No suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-45 |
| 3.4-10 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area / Western Joshua tree / Potential for Occurrence in Study Area / Unlikely. Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during surveys. | This species is a tree that is observable anytime and it was not observed. *Suggested clarification to align with the PEA BRTR:* Absent. ~~Unlikely.~~ Suitable habitat is present within the buffer of the botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None were encountered during surveys. | A.1-46 |
| 3.4-10 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Colorado Desert larkspur \| Potential for Occurrence in Study Area \| Unlikely. No suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggested clarification*: Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the buffer of the botanical study area and not the project area. No | A.1-47 |

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| | | CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-47 |
| 3.4-10 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Crowned muilla \| Potential for Occurrence in Study Area \| Unlikely. No suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggested clarification*: Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the buffer of the botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-48 |
| 3.4-10 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Joshua Tree poppy \| Potential for Occurrence in Study Area \| Unlikely. No suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | No information is provided as to why the species is not absent. *Suggested clarification to align with Potential summary*: Potential for Occurrence in Study Area \| Absent. ~~Unlikely.~~ No suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-49 |
| 3.4-10 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| White pygmy-poppy \| Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggested clarification*: Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the buffer of the botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-50 |
| 3.4-11 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Mojave spineflower \| Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This special-status plant species had the potential to occur in the buffer area surrounding the project area within the Botanical Study Area. *Suggested clarification*: Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the buffer of the botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-51 |
| 3.4-11 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Mojave fishhook cactus \| Potential for Occurrence in Study Area \| Unlikely. No suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This species is a large perennial cactus that is observable anytime, and it was not observed. *Suggested clarification:* Potential for Occurrence in Study Area \| Absent. ~~Unlikely.~~ Suitable habitat is present within the buffer of the botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-52 |

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| 3.4-11 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Mojave indigo-bush\| Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This species is a large perennial species that is observable anytime, and it was not observed. *Suggested clarification:* Potential for Occurrence in Study Area \| Absent. ~~Unlikely~~. Suitable habitat is present within the buffer of the botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-53 |
| 3.4-11 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Mojave menodora \| Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This species is a large perennial species that is observable anytime, and it was not observed. *Suggested clarification:* Potential for Occurrence in Study Area \| Absent. ~~Unlikely~~. Suitable habitat is present within the buffer of the botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-54 |
| 3.4-11 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area \| Torrey's box-thorn \| Potential for Occurrence in Study Area \| Unlikely. Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | This species is a large perennial species that is observable anytime, and it was not observed. *Suggested clarification:* Potential for Occurrence in Study Area \| Absent. ~~Unlikely~~. Suitable habitat is present within the buffer of the botanical study area and not the project area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. | A.1-55 |
| 3.4-12 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Study Area \| Monarch butterfly \| Potential for Occurrence in Study Area \| Unlikely. The biological study area is within range of the monarch butterfly. No CNDDB occurrences recorded within 5 miles of the biological study area. One milkweed species, climbing milkweed (*Funastrum cynanchoides* var. *hartwegii*), was observed in the biological study area. Monarch could migrate through the botanical study area, but individuals were not observed in the biological study area during field surveys. | *Suggested clarification*: Unlikely. The biological study area is within range of the monarch butterfly. No CNDDB occurrences recorded within 5 miles of the biological study area. One milkweed species, climbing milkweed (*Funastrum cynanchoides* var. hartwegii), was observed in the biological study area. Monarch could migrate through the ~~botanical~~ biological study area, but individuals were not observed in the biological study area during field surveys. The project area is mostly denuded of any vegetation so it is unlikely that any Monarch's would be present in the project area. | A.1-56 |
| 3.4-13 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Study Area \| Desert tortoise \| Potential for Occurrence in Study Area. \| Unlikely. Undeveloped portions of the biological study area may provide low-quality habitat. Eight CNDDB occurrences were recorded within 5 miles of the biological study area. The | *Suggest clarification:* Unlikely. There is no suitable habitat present within the project area. Undeveloped portions of the biological study area may provide low-quality habitat. Eight CNDDB occurrences were recorded within 5 miles of the biological study area. The Project site consists of | A.1-57 |

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| | Project site is fenced and precludes desert tortoise from entering the site. None were identified in the biological study area during field surveys. | developed/disturbed lands and is fenced which precludes desert tortoise from entering the site. None were identified in the biological study area during field surveys. | A.1-57 |
| 3.4-14 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Study Area \| Burrowing Owl \| Potential for Occurrence in Study Area. Possible. Suitable breeding habitat may occur in the biological study area where ground squirrel burrows are found. Suitable foraging habitat is available in agricultural areas. Six CNDDB occurrences-reported within 5 miles of the biological study area. No burrows or burrowing owls encountered during field surveys. | The suitable breeding habitat area where ground squirrel burrows in the biological study area were found is outside of the project area. There were no burrows or burrowing owls encountered during surveys and no potential habitat exists in the project area. Survey protocol that was implemented was approved by CDFW for the project. Suggest staying with findings in PEA and BRTR that burrowing owl is **Unlikely to Occur.**<br><br>*Suggested clarification:* ~~Possible~~. Unlikely to Occur. Suitable breeding habitat may occur in the biological study area, outside of the project area, where ground squirrel burrows are found. Suitable foraging habitat is available in agricultural areas. Six CNDDB occurrences-reported within 5 miles of the biological study area. No burrows or burrowing owls were encountered during protocol level surveys. | A.1-58 |
| 3.4-15 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Study Area \| Loggerhead shrike \| Potential for Occurrence in Study Area. Possible. Marginal, low quality foraging habitat is present within the creosote bush scrub/allscale scrub habitat in the biological study area. No CNDDB nests recorded within 5 miles of the biological study area. May migrate through the biological study area but it is unlikely to remain for foraging or breeding. None encountered during field surveys. | The BRTR notes that there is no suitable nesting or foraging habitat present within the project area and marginal foraging habitat is present within the creosote bush scrub/allscale scrub habitat of the BSA.<br><br>*Suggest clarification:* Possible. Marginal, low quality foraging habitat is present within the creosote bush scrub/allscale scrub habitat in the biological study area outside of the project area, but there is no suitable nesting or foraging habitat present within the project area. | A.1-59 |
| 3.4-18 | Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Study Area \| Mohave ground squirrel \| Potential for Occurrence in Study Area. Possible. Potential suitable habitat is present within the biological study area. Three CNDDB occurrences reported within 5 miles of the biological study area. None encountered during field surveys. | Suggest staying with findings in BRTR that Mohave ground squirrel is Unlikely to Occur due to the results of intensive protocol level surveys that were pre-approved for the project by CDFW.<br><br>*Suggest clarification:* Potential for Occurrence in Study Area. ~~Possible.~~ Unlikely to Occur. The entire project area is developed | A.1-60 |

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| | | and does not contain suitable habitat; however; ~~P~~ potential suitable habitat is present within the biological study area. Three CNDDB occurrences reported within 5 miles of the biological study area. ~~None encountered during field surveys.~~ Protocol live-trapping and camera stations completed during the 2024 field surveys found no individuals in the BSA. | A.1-60 |
| 3.4-20 | While some habitat for special status plant species may occur within the biological study area habitat quality is generally low due to existing development, agricultural uses, and fragmentation of native vegetation communities (Jacobs 2025). | The later portion of the statement is not found in the cited reference, … "is generally low due to existing development, agricultural uses, and fragmentation of native vegetation communities (Jacobs 2025)." Also, important to note that the project area is disturbed and developed. *Suggested clarification*: Revise the statement to reflect information found in the reference or remove the reference and add: The project area is mostly developed and disturbed. | A.1-61 |
| 3.4-20 | The locations of the CNDDB recorded occurrences of Barstow woolly sunflower, desert cymopteris, and beaver dam breadroot were also surveyed as reference sites but none were encountered (Jacobs 2025). | The reference describes visits to reference population areas, not CNDDB recorded occurrence locations. *Suggested clarification*: The several reference populations ~~locations of the CNDDB recorded occurrences~~ of Barstow woolly sunflower, desert cymopteris, and beaver dam breadroot were visited ~~also surveyed~~ as reference sites but none were observed ~~encountered~~ (Jacobs 2025). | A.1-62 |
| 3.4-20 | The CNDDB indicates the largest of four historic populations of desert tortoise have been mapped within approximately one mile of the Hinkley Compressor Station. | The populations are mapped within approximately 5 miles of the station. *Suggested clarification:* The CNDDB indicates the largest of four historic populations of desert tortoise have been mapped within approximately ~~one~~ five miles of the Hinkley Compressor Station. | A.1-63 |
| 3.4-21 | CDNNB recorded occurrences of Mohave ground squirrel within 5 miles of the Hinkley Compressor Station. The most recent occurrence was reported northwest of the Project site in 2012 and oldest was reported in 1949 southeast of the Project area. No Mohave ground squirrels were captured during field surveys; however potential habitat does occur within the western portion of Hinkley Compressor Station fence line (Jacobs 2025). | The sentence references records, not an occurrences, which CNDDB defines differently. Also, the PEA and BRTR note that there were few records within 5 miles, one from 1949, one from 1990 and one from 2012. The record from 1990 was found to be questionable by MGS experts because it was a visible sighting and not an observation from more reliable methods such as from live trapping or phototrapping, It also notes that the 2012 record was a visible record. See the discussion from the PEA and BRTR. *Suggested clarification:* The most recent records ~~occurrence was~~ were reported northwest of the Project site in | A.1-64 |

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| | | 2012 and east of the Project site in 1990, and oldest was reported in 1949 southeast of the Project area. Both the 2012 and 1990 records were from visible sightings that are less definitive records for Mohave ground squirrel than records from protocol level survey that include trapping. No Mohave ground squirrels were captured during intensive protocol field surveys throughout the biological study area. The entire project site is developed and does not contain suitable habitat for the species; however potential habitat does occur within the western portion of Hinkley Compressor Station fence line (Jacobs 2025). | A.1-64 |
| 3.4-27 | Table 3.4-4 APMS Relevant to Biological Resources | These APMs are edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of each PG&E's proposed measure.<br><br>Correct the text to align exactly with the text proposed by PG&E in the PEA for APM BIO-1, APM BIO-2, APM BIO-3, and APM BIO-4. | A.1-65 |
| 3.4-35 | **Impact Question f) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**<br><br>The Project is located within the boundaries of the PG&E Hinkley Groundwater Remediation Project HCP. The Project would be implemented within the developed Hinkley Compressor Station site and would not conflict with habitat preservation or other requirements in the *Hinkley Groundwater Remediation Project HCP*. No conflict with any habitat conservation plan is anticipated. | The concluding statement introduces uncertainty that there may be a conflict following definitive statements that there is no conflict. *Suggested clarification:* The Project would not ~~No~~ conflict with any habitat conservation plan ~~is anticipated~~. | A.1-66 |
| Greenhouse Gas Emission | | | |
| 3.8-6 | **Impact Question b) Would the Project conflict with an applicable plan, policy, or regulation adopted for reducing GHG emissions?**<br>In December 2022, the CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality, outlining a roadmap to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045 (CARB 2022). As discussed above, the Project would not generate new GHG emissions during operation, and the GHG emissions during construction would be short-term and below applicable MDAQMD thresholds of significance. The Project would not modify PG&E's existing gas transmission system, other than the station's electrical distribution equipment | The concluding impact statement contradicts the six preceding statements that there is no conflict with the project. *Correction requested:* ~~The impact would be less than significant.~~ There would be no impact. | A.1-67 |

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| | upgrade. The Project would not change existing gas transmission capacities or modify station operation functions, other than increasing safety and reliability associated with the electrical distribution system. The Project would not increase natural gas usage during operation. In summary, Project operation would not conflict with the 2022 Scoping Plan. The impact would be less than significant. No mitigation is required. | | A.1-67 |
| Recreation | | | |
| 3.16-1 | 3.16 Recreation<br>Environmental Impacts Table Impact Question a) | Both 'Potentially Significant Impact' and 'No Impact' are marked for a), and subsequent discussion concludes 'No Impact'. Please remove the 'Potentially Significant Impact' mark. | A.1-68 |
| Utilities and Service Systems | | | |
| 3.19 | Central Valley Regional Water Quality Control Board (CRWQCB) references in this resource section. | The resource section references CRWQCB instead of LRWQCB where the project is located. *Correction suggested:* CRWQCB to LRWQCB, globally. | A.1-69 |
| 3.19-7 | **Table 3.19-3 APMs Relevant to Utilities and Service Systems**<br><br>APM GHG-1: PG&E Minimize GHG Emissions | Section 3.19.3 does not discuss how the implementation of APM GHG-1 relates to Utilities and Service Systems. *Correction suggested:* Remove the Table 3.19-3, and the general introductory statement in Section 3.19.3. | A.1-70 |
| 3.19-8 | **Impact Question b) Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?**<br><br>During construction, the Project would require water for dust control and concrete. Water would be obtained from existing PG&E wells that already supply the Hinkley Compressor Station. The Mojave River Groundwater Basin is adjudicated, and the court-appointed Mojave Basin Area Watermaster administers pumping though each producer's Free Production Allowance (FPA) and requires that any production above FPA be offset though leases/transfers or replacement assessments. Because construction water for dust control and minor concrete work would be supplied from existing PG&E wells and accounted for under PG&E's adjudicated rights in the Centro Subarea, PG&E would have sufficient water supplies for construction during normal, dry, and multiple dry years. The impact on water supplies during the 23-month construction period would be less than significant.<br><br>Operation and maintenance of the Project would not create a demand for water. As a result, there would be no impact on water supplies during operation and maintenance. | The concluding impact statement contradicts the preceding statements that clearly state the project would have sufficient water supplies.<br><br>*Correction requested:* There would be no impact on water supplies during the 23-month construction period ~~would be less than significant~~. | A.1-71 |
| Chapter 5 – Mitigation Monitoring and Reporting Plan | | | |

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| 5-11 | APM BIO-1: Protect Nesting Birds<br><br>For any construction scheduled during the typical migratory bird or raptor nesting season (March 1 through August 15), preconstruction migratory bird and raptor nesting surveys would be performed by a qualified biologist. Surveys would occur in publicly accessible areas and/or where PG&E has existing access. Private property would not be used for access. If active nests containing eggs or young are found, an appropriate nest exclusion zone would be established to prevent disturbance to the nest. Migratory bird and raptor nesting preconstruction surveys and avoidance measures would be performed in accordance with PG&E's Nesting Bird Management Plan. | This APM is edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of PG&E's proposed measure. *Correction requested:*<br><br>APM BIO-1: Protect nesting birds<br>If construction is to occur during the avian nesting season (March 1 through August 15), a preconstruction migratory bird and raptor nesting survey will be performed by a qualified biologist who is familiar with local avian species and nesting birds. Surveys will occur only in publicly accessible areas and areas where PG&E has existing access; private property will not be accessed and will instead be observed from adjacent accessible areas.<br><br>Preconstruction nesting bird surveys will be performed in accordance with PG&E's Nesting Bird Management Plan. The preconstruction survey will cover a radius of 200 feet for nonlisted raptors and 100 feet for nonlisted passerines from project locations that will be actively worked at in the near term. The survey will cover all affected areas where ground disturbance is required. If any active nests containing eggs or young are found, an appropriate nest exclusion zone will be established by the PG&E biologist in accordance with PG&E's Nesting Bird Management Plan. No heavy equipment will be operated in this exclusion zone until the biologist has determined that the nest is no longer active, and the young have fledged. If it is not practicable to avoid work in an exclusion zone around an active nest, work activities will be modified to minimize disturbance of nesting birds but may proceed in these zones at the discretion of the biologist. As appropriate, the biologist will monitor work activities in these zones daily or periodically when construction is occurring and assess their effect on the nesting birds. If the biologist determines that particular activities pose a high risk of disturbing an active nest, the biologist will recommend additional, feasible measures to minimize the risk of nest disturbance. If work cannot proceed without disturbing the nesting birds, or signs of disturbance are observed by the monitor, work may need to be halted or redirected to other areas |

A.1-72

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| | | until the nesting and fledging is completed or the nest has otherwise failed for reasons not related to construction. | A.1-72 |
| 5-11 | APM BIO-1: Protect Nesting Birds \| Requirement and Training<br>Before Construction: The training material is submitted to the CPUC at least 30 days before construction<br>During Construction: Workers receive the CPUC- approved training prior to working on the site. | The APM does not include training. *Correction requested:*<br>APM BIO-1: Protect Nesting Birds \| Requirement and Training<br>Before Construction: ~~The training material is submitted to the CPUC at least 30 days before construction~~ Preconstruction nesting bird surveys will be performed in accordance with PG&E's Nesting Bird Management Plan.<br>During Construction: ~~Workers receive the CPUC- approved training prior to working on the site.~~ Appropriate nest exclusion zones, work activities modification, or biological monitoring will occur at the discretion of the PG&E biologist. | A.1-73 |
| 5-11 | APM BIO-2: Protect Wildlife Trapped in Trenches or Steep-walled Holes<br><br>All excavated holes/trenches that are not filled at the end of a workday would be covered, or a wildlife escape ramp would be installed to prevent the inadvertent entrapment of wildlife species. Excavated holes/trenches left overnight would be inspected prior to the onset of work. If wildlife is found, work would pause until the PG&E biologist is able to remove and relocate the animal. | This APM is edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of PG&E's proposed measure. *Correction requested:*<br><br>APM BIO-2: Protect wildlife trapped in trenches or steep-walled holes<br><br>Field crews will fit open trenches or steep-walled holes with escape ramps of plywood boards or sloped earthen ramps at each end if left open overnight. Field crews will search open trenches or steep-walled holes every morning prior to initiating daily activities to ensure wildlife is not trapped. If any wildlife is found, work will stop, and the PG&E biologist will be contacted to move the animal out of harm's way. | A.1-74 |
| 5-11 | APM BIO-2: Protect Wildlife Trapped in Trenches or Steep-walled Holes \| Requirement and Training<br><br>During Construction: Covering or filling excavated holes and trenches at end of each workday. | The APM excludes the potential use of ramps. *Correction requested:*<br><br>During Construction: Covering or filling excavated holes and trenches at end of each workday, or creating a temporary wildlife escape ramp. | A.1-75 |

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| 5-12 | APM BIO-4. Worker Environmental Awareness Program – Biological Resources Portion | This APM is edited from what the Applicant, PG&E, included in the PEA and must be corrected to the exact text of PG&E's proposed measure. *Correction requested:*<br><br>APM BIO-4. Worker Environmental Awareness Program – Biological Resources Portion<br>A worker environmental awareness program (WEAP) will be prepared for the project to communicate environmental issues and appropriate work practices specific to the project to all construction field personnel before they begin work on the project. A PG&E biologist or designee familiar with resources in the area will deliver the WEAP biological resources portion. Training will include a discussion of the potential for nesting birds and possible buffers, along with the requirement to protect wildlife from becoming trapped in trenches or steep-walled holes. Training will include information about federal laws protecting nesting birds. A copy of the training sign-in sheets documenting participation in the training will be provided to the CPUC. | A.1-76 |
| 5-12 | APM BIO-4. Worker Environmental Awareness Program – Biological Resources Portion \| Requirement and Training<br>During Construction: Workers receive the CPUC- approved training prior to working on the site. | The APM does not include approval of training material. *Correction requested:*<br>During Construction: Workers receive the ~~CPUC- approved~~ training prior to working on the site. | A.1-77 |
| 5-15 | APM CUL-1: Worker Environmental Awareness Training Program – Cultural Resources Portion \| Requirement and Training<br>During Construction: Workers receive the CPUC- approved cultural resource training prior to working on the site. | The APM does not include approval of training material. *Correction requested:*<br>During Construction: Workers receive the ~~CPUC- approved~~ cultural resource training prior to working on the site. | A.1-78 |
| 5-16 | APM CUL-2: Inadvertent Cultural Resource Discoveries \| Requirement and Training<br><br>During Construction: (1) Work within 100 feet of discovered resources stops, (2) The required personnel and agencies are notified, (3) Adequate reporting and documentation occurs, (4) Significant resources are completely avoided or mitigated from impacts, and (5) Work only resumes near the resource after required procedures are complete, to the satisfaction of CPUC. | The APM includes coordination with the CPUC and NAHC. *Correction requested:*<br>During Construction: (1) Work within 100 feet of discovered resources stops, (2)The required personnel, PG&E Cultural Resource Specialist, and CPUC ~~agencies~~ are notified, (3) Adequate reporting and documentation occurs, (4) Significant resources are completely avoided or mitigated from impacts, and (5) Work only resumes near | A.1-79 |

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| | | the resource after required procedures are complete in coordination with~~, to the satisfaction of~~ CPUC. | A.1-79 |
| 5-16 | APM CUL-3: Unanticipated Discovery of Human Remains \| Requirement and Training | The APM includes coordination with the County Coroner, and consultation between the landowner and the Most Likely Descendant (MLD) as appropriate. *Correction requested:*<br>During Construction: (1) Work within 100 feet of discovered resources stops, (2)The required personnel, PG&E Cultural Resource Specialist, and CPUC ~~agencies~~ are notified, (3) Adequate reporting and documentation occurs, (4) Significant resources are completely avoided or mitigated from impacts, and (5) Work only resumes near the resource after treatment or disposition is complete as determined by the County Coroner, or landowner and MLD as appropriate ~~required procedures are complete, to the satisfaction of CPUC~~. | A.1-80 |
| 5-18 | APM PAL-1: Retain a Qualified Paleontological Principal Investigator \| Requirement and Training | The measure does address monitoring or reporting. *Suggested clarification:*<br>During Construction: N/A ~~Archaeological monitoring and reporting.~~ | A.1-81 |
| 5-19 | APM PAL-3: Paleontological Resource Monitoring for Project Excavation or Trenching Activities \| Requirement and Training | The measure addresses paleontological monitoring. *Suggested clarification:*<br>During Construction: ~~Archaeological~~ Paleontological monitoring and reporting. | A.1-82 |
| 5-19 | AMP PAL-4: Unanticipated Paleontological Discovery \| Requirement and Training | The APM includes activities performed by the qualified paleontologist in coordination with the PG&E CRS. *Correction requested:*<br>During Construction: (1) Work within 100 feet of discovered resources stops, (2)The required personnel and agencies are notified, (3) Adequate reporting and documentation occurs, (4) Significant resources are completely avoided or mitigated from impacts, and (5) Work only resumes near the resource after required procedures are complete~~, to the satisfaction of CPUC~~. | A.1-83 |
| 5-20 | APM GHG-1: PG&E Minimize GHG Emissions \| Requirement and Training | The APM was informed by CPUC's Draft Environmental Measures. *Correction requested:* | A.1-84 |

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| | | During Construction: Implement GHG minimization measures in adherence with APM GHG-1.~~CPUC's Draft Environmental Measures.~~ | A.1-84 |
| 5-21 | APM HAZ-1: Development and Implementation of Hazardous Material and Emergency Response Procedures \| Requirement and Training | The APM does not include approval of training material.<br>*Correction requested:*<br>Before Construction: Hazardous Materials Management Plan is submitted to the CPUC ~~for review and approval~~ at least 30 days prior to construction. | A.1-85 |
| 5-24 | APM NOI-1: General Construction Noise Management \| Requirement and Training | The measure addresses noise management not retaining a qualified paleontologist. *Replace text with APM NOI-1:*<br>PG&E will employ standard noise-reducing construction practices such as the following:<br>▪ Comply with manufacturer's muffler requirements on all construction equipment engines and ensure exhaust mufflers are in good condition.<br>▪ Turn off construction equipment when not in use, where applicable.<br>▪ Include noise control requirements for construction equipment and tools in specifications provided to construction contractors to the maximum extent practicable, including performing all work in a manner that minimizes noise.<br><br>*Suggested clarification:*<br>During Construction: ~~Archaeological monitoring and reporting~~ Implement standard noise-reducing construction practices. | A.1-86 |

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## Response to Letter A.1-1 – A.1-86 – PG&E

**Response A.1-1**
The comment noted that PG&E's Applicant Proposed Measures (APMs) were edited in the IS/MND and should be the exact text proposed by PG&E in the Proponent's Environmental Assessment (PEA).

All APMs have been updated in this Final IS/MND to reflect the exact text proposed by PG&E and are consistent with the PEA. See Section 3 for revisions to the APM text in the IS/MND.

**Response A.1-2**
The comment requested modification to the language on page 3 of the MND based on PG&E stated objectives for the project. The text on page MND-3 is revised in ~~strikethrough~~ and underline as follows:

> PG&E's stated objectives of the Proposed Project are to align with current PG&E and industry ~~ensure compliance with CPUC G.O. 95~~ standards and address safety and reliability concerns related to the condition of the compressor station.

**Response A.1-3**
The comment recommended removing language regarding deficiency reports as no deficiency reports were issued for the project. The text on page MND-3 is revised in ~~strikethrough~~ and underline as follows:

> The IS relies on information in PG&E's Application filed on April 9, 2025; PG&E's responses to ~~deficiency reports and~~ data requests; the CPUC's independent analysis; and other environmental analyses.

**Response A.1-4**
The comment recommended the preconstruction survey buffer described under Mitigation Measure BIO-1: Desert Tortoise and Mohave Ground Squirrel, be reduced from 500 meters to 500 feet and the no disturbance buffer be reduced from 200 meters to 200 feet given the disturbed nature of the project area and existing uses of the facility.

The CPUC defined the disturbance buffers in the draft measure to be broad to ensure avoidance of species. However, based on additional consideration of the site conditions and level of disturbance at the existing facility, the buffer reduction is accepted as it would still support avoidance of the species. The change in the measure would thus not create a new significant impact. The measure is revised as follows:

> **Mitigation Measure BIO-1: Desert Tortoise and Mohave Ground Squirrel**
>
> Preconstruction clearance surveys for any burrows potentially containing desert tortoise or Mohave ground squirrel burrows shall be completed by a qualified biologist within 500 feet ~~meters (approximately 1,600 feet)~~ of the project footprint prior to the onset of construction activities. If the burrow has any sign of recent use by a desert tortoise or

Mohave ground squirrel, the burrow shall be monitored by a qualified biologist for signs of activity. No construction activity shall be allowed within 200 feet ~~meters (approximately 656 feet)~~ of a burrow containing desert tortoise or Mohave ground squirrel without obtaining approval from CDFW. All project activities within 500 feet ~~meters (approximately 1,600 feet)~~ of an occupied desert tortoise or Mohave ground squirrel burrow shall be monitored by a qualified biologist to ensure avoidance of the species.

**Response A.1-5**

The commenter requested the exclusion zones included under Mitigation Measure BIO-2: Desert Kit Fox be revised for consistency with PG&E's Southern California Desert Gas Pipeline Operation and Maintenance Activities Section 2081 ITP. The ITP requires a 100-foot disturbance-free buffer zone for desert kit fox non-natal dens, if possible, and a 500-foot disturbance free buffer around natal dens. The requested buffer zones are similar to those initially included in the mitigation measure, which are 50 meters for non-natal dens and 200 meters for natal dens. The CPUC defined the disturbance buffers in the draft measure to be broad to ensure avoidance of species. However, based on additional consideration of the site conditions and level of disturbance at the existing facility, the buffer reduction is accepted as it would still support avoidance of the species. The change in the buffer would thus not create a new significant impact. The measure is revised as follows:

**Mitigation Measure BIO-2: Desert Kit Fox**

If an active, non-natal den is detected within the project footprint, then a 100-foot ~~50 meters (approximately 165 feet)~~ construction exclusion zone will be established, and passive relocation techniques may be used as determined by the qualified biologist. The buffer area will be maintained until passive relocation is successfully completed. If an active natal den is detected within the project footprint a 500-foot ~~200 meters (approximately 656 feet)~~ construction exclusion zone will be established, and passive relocation will not be implemented until monitoring confirms that the den is no longer in active use as a natal den.

**Response A.1-6**

The commenter noted repetition of the use of "would include" in the Project description on page 2-1. The text on page 2-1 is revised in ~~strikethrough~~ as follows:

The Project site consists of the 64-acre fenced compressor station, within which the Project ~~would include~~ would be implemented in a 15.8-acre work area and a 9.7-acre staging area (Figure 2-2 and Figure 2-3).

**Response A.1-7**

The commenter recommended revising the impact discussions in Chapter 3 that include grading and site stabilization because the Project does not include grading or site stabilization. The removal of grading and site stabilization from the MND does not affect the impact

conclusions in the MND. Grading and site stabilization were removed from the following impact discussions in Chapter 3 of the Draft MND:

- Section 3.3, Air Quality, subsection 3.3.4, Environmental Impacts under Impact Question B on page 3.3-9
- Section 3.4, Biological Resources, subsection 3.4.5, Environmental Impacts, under Impact Question A on page 3.4-32.
- Section 3.10, Hydrology and Water Quality, subsection 3.10.4, Environmental Impacts, under Impact Question B on page 3.10-10 and under Impact Question C (i) on page 3.10-11.

Please refer to Section 3 of this Final MND for details on the revisions to the text of the Draft MND.

**Response A.1-8**
The commenter noted there are currently no known sensitive biological, cultural, paleontological, or hydrological resources within the Project construction or staging areas. The lack of known biological, cultural, paleontological, or hydrological resources is noted. The language in section 2.6.1 Site Preparation, Survey and Staking on page 2-7 has be revised in ~~strikethrough~~ and underline for clarity as follows:

> The Project site would be surveyed to locate and identify new underground conduit locations and the MCC-9 location, using paint on the ground or installing horizonal and vertical stakes. Typical surveying and staking techniques and hand equipment would be used. PG&E also would clearly mark any sensitive biological, cultural, paleontological, or hydrological resources identified during pre-construction surveys or monitoring during construction, where appropriate, to prevent construction activities and equipment from entering those areas per the requirements of applicant proposed measures (APMs) and any required mitigation measures.

**Response A.1-9**
In the Project description, the commenter recommended removing the language regarding soil compaction in the staging area, which is an existing area. The change to the project description by removing compaction and grading does not change the impact conclusions in the MND. The text on page 2-8 is revised in ~~strikethrough~~ and underline to reflect no soil compaction or grading as follows:

> The Project would use an approximately 9.7-acre staging area within the compressor station (Figure 2-3). The staging area currently is used regularly for compressor station staging and laydown activities. The staging area would use berms or other methods to contain excess water from concrete wash water. ~~The soil in the staging area would be compacted.~~ Soil stockpiles may be in the staging area.
>
> Project staging activities would avoid landscaping trees in the staging area. Staging would occur in the open areas and would not occur in the existing structure or areas

under the landscaping trees. No tree or other landscaping or structure removal would be required in the area. Staging may occur in the work area as well. Site preparation does not include grading or other site stabilization activities to prepare construction staging areas.

**Response A.1-10**
The commenter noted industry safety protocols are standard and not described with adjectives. The change does not affect the impact analysis or conclusions in the MND. The text section 2.6.3 Temporary Power Setup, page 2-8 is revised in ~~strikethrough~~ and underline as follows:

Transitioning between permanent and temporary power, as well as disconnecting equipment for replacement, would follow ~~strict~~ safety protocols, including lockout and tagout procedures and operational clearances. Replacement activities would involve carefully planned outages, removal of old equipment, installation of new components, and coordinated re-energizing.

**Response A.1-11**
The commenter recommended adding a sentence to reflect Section 3.5.10.1 and 3.5.10.2 of the PEA which states that the existing natural gas within the station will be used to fuel the temporary Portable Equipment Registration Program (PERP) generators. The change to the project description provides clarification and does not affect the impact analysis or conclusions in the MND. The text on page 2-11 is revised in ~~strikethrough~~ and underline as follows:

Hazardous materials, such as fuels, lubricants, cleaning solvents, and other chemicals would not be stored on site, and all fueling and storage would occur off-site. Natural gas from within the station will be used to fuel the temporary PERP generators. Fuel, grease, and fluids that would be needed for construction equipment operations would be on site periodically; these would be handled in keeping with the Project's APMs and BMPs that address their proper use, storage, and cleanup, if warranted.

**Response A.1-12**
The commenter recommended removing the reference to travel via personal vehicles in the section discussing construction traffic in the Project description because commutes may occur in rental or company vehicles. The clarification to the type of vehicles used does not affect the impact analysis or conclusions in the MND. The language on page 2-15 is revised in ~~strikethrough~~ and underline as follows:

Construction crews (worker commutes) would travel to and from the Project site via ~~personal~~ light-duty vehicles ~~and light-duty~~ or trucks. Worker daily commute trips and vendor or delivery truck trips would total approximately 20 miles roundtrip. Equipment would be staged on site in a work area within the station or be brought to the work area daily on work trucks or trucks with trailers.

**Response A.1-13**
The commenter requested APM AIR-1 Dust Control During Construction use wording consistent with the PEA. The modification affects the text in one bullet point in APM AIR-1. The change in APM AIR-1 does not affect the conclusions in the MND as the revised APM AIR-1 is equally effective in controlling fugitive dust. APM AIR-1 is revised in ~~strikethrough~~ and underline as follows:

- Water or cover ~~all exposed surfaces~~ with coarse rock all exposed surfaces with the potential to generate dust with coarse rock, to reduce the potential for airborne dust from leaving ~~to leave~~ the ~~Project~~ site.

**Response A.1-14**
The commenter requested APM BIO-1: Protect Nesting Birds use wording consistent with the PEA. The requested revisions to the APM provide greater detail on implementation and would provide equal or greater protection to biological resources. The revisions to the APM would not result in a new significant impact. APM BIO-1 is revised in ~~strikethrough~~ and underline as follows:

> ~~For any~~ If construction is to occur scheduled during the ~~typical migratory bird or raptor~~ avian nesting season (March 1 through August 15), a preconstruction migratory bird and raptor nesting surveys ~~would~~ will be performed by a qualified biologist who is familiar with local avian species and nesting birds. Surveys ~~would~~ will occur only in publicly accessible areas and/or where PG&E has existing access.; ~~Private~~ private property ~~would~~ will not be ~~used for access~~ accessed and will instead be observed from adjacent accessible areas. ~~If active nests containing eggs or young are found, an appropriate nest exclusion zone would be established to prevent disturbance to the nest.~~
>
> ~~Migratory bird and raptor nesting preconstruction~~ Preconstruction nesting bird surveys ~~and avoidance measures would~~ will be performed in accordance with PG&E's Nesting Bird Management Plan. The preconstruction survey will cover a radius of 200 feet for nonlisted raptors and 100 feet for nonlisted passerines from project locations that will be actively worked at in the near term. The survey will cover all affected areas where ground disturbance is required. If any active nests containing eggs or young are found, an appropriate nest exclusion zone will be established by the PG&E biologist in accordance with PG&E's Nesting Bird Management Plan. No heavy equipment will be operated in this exclusion zone until the biologist has determined that the nest is no longer active, and the young have fledged. If it is not practicable to avoid work in an exclusion zone around an active nest, work activities will be modified to minimize disturbance of nesting birds but may proceed in these zones at the discretion of the biologist. As appropriate, the biologist will monitor work activities in these zones daily or periodically when construction is occurring and assess their effect on the nesting birds. If the biologist determines that particular activities pose a high risk of disturbing an active nest, the biologist will recommend additional, feasible measures to minimize the risk of nest disturbance. If work cannot proceed without disturbing the nesting

birds, or signs of disturbance are observed by the monitor, work may need to be halted or redirected to other areas until the nesting and fledging is completed or the nest has otherwise failed for reasons not related to construction.

**Response A.1-15**
The commenter requested APM BIO-2: Protect Wildlife Trapped in Trenches or Steep-walled holes use wording consistent with the PEA. The requested revisions to the APM would provide equal protection to biological resources. The revisions to the APM would thus not result in a new significant impact. APM BIO-2 is revised in ~~strikethrough~~ and underline as follows:

~~All excavated holes/trenches that are not filled at the end of a workday would be covered, or a wildlife escape ramp would be installed to prevent the inadvertent entrapment of wildlife species. Excavated holes/trenches left overnight would be inspected prior to the onset of work. If wildlife is found, work would pause until the PG&E biologist is able to remove and relocate the animal.~~

Field crews will fit open trenches or steep-walled holes with escape ramps of plywood boards or sloped earthen ramps at each end if left open overnight. Field crews will search open trenches or steep-walled holes every morning prior to initiating daily activities to ensure wildlife is not trapped. If any wildlife is found, work will stop, and the PG&E biologist will be contacted to move the animal out of harm's way.

**Response A.1-16**
The commenter requested APM BIO-3: Preconstruction Surveys use wording consistent with the PEA. The requested revisions to the APM would provide equal protection to biological resources. The revisions to the APM would not result in a new significant impact. APM BIO-3 is revised in ~~strikethrough~~ and underline as follows:

Preconstruction biological clearance surveys ~~would~~ will be completed by a qualified biologist prior to ~~the onset of~~ construction activities beginning and will occur throughout the project site to minimize impacts on wildlife.

**Response A.1-17**
The commenter requested APM BIO-4: Worker Environmental Awareness Program-Biological Resources Portion use wordinig consistent with the PEA. The requested revisions to the APM would provide equal protection to biological resources. The revisions to the APM would not result in a new significant impact. APM BIO-4 is revised in ~~strikethrough~~ and underline as follows:

A ~~Worker Environmental Awareness Program~~ worker environmental awareness program (WEAP) would will be prepared for the project ~~and implemented to educate construction and O&M workers on site-specific biological and non-biological resources and proper work practices to avoid harming wildlife during construction or O&M~~ to communicate environmental issues and appropriate work practices specific to the project to all construction field personnel before they begin work on the project. A PG&E

biologist or designee familiar with resources in the area will deliver the WEAP biological resources portion. Training will include a discussion of the potential for nesting birds and possible buffers, along with the requirement to protect wildlife from becoming trapped in trenches or steep-walled holes. Training will include information about federal laws protecting nesting birds. ~~The WEAP would include training which addresses the requirements for protecting wildlife from entrapment in open trenches or steep-walled holes and nesting birds.~~ A copy of the training sign-in sheets documenting participation in the training would be provided to the CPUC.

**Response A.1-18**
The commenter requested APM CUL-1: Worker Environmental Awareness Program, Cultural Resources Portion use wording consistent with the PEA. The requested revisions to the APM are minor text clarifications and would provide equal protection to biological resources. The revisions to the APM would not result in a new significant impact. APM CUL-1 is revised in ~~strikethrough~~ and underline as follows:

A worker environmental awareness training program (WEAP) will be prepared to communicate environmental issues and appropriate work practices specific to the Project to all construction field personnel before they begin work on the Project performing excavation or trenching activities. This training will be administered by a qualified cultural resource professional, either as a standalone training or as part of the overall environmental awareness training ~~that will be~~ required ~~for~~ by the Project~~. This training~~ and may be recorded for use in subsequent training sessions. The WEAP program will be provided separately to CPUC staff ~~before the start of~~ prior to construction. The WEAP will address, among other topics, ~~the following topics~~ at a ~~mimimum~~ minimum:

- A review of archaeology, history, precontact, and Native American cultures associated with historical resources ~~in the Project vicinity~~ near the project
- A review of applicable local, State, and federal ordinances, laws, and regulations pertaining to historic preservation
- A discussion of procedures to be followed if unanticipated cultural resources are discovered during ~~Project~~ implementation of the project
- A discussion of disciplinary ~~action~~ and other actions that can be taken against persons violating historic preservation laws and PG&E policies
- A statement by the construction company or applicable employer, agreeing to abide by the WEAP, PG&E policies, and other applicable laws and regulations.

**Response A.1-19**
Under APM PAL-4, Unanticipated Paleontological Discovery, the commenter agreed to a typographical error correction in the last bullet point, revising the word “paleontological” to “paleontologist”. No revision is required.

**Response A.1-20**
The commenter noted the Project construction area would be behind the large, existing station buildings which would block the Project's outdoor equipment, MCCs and Auxiliary Load Center from view; therefore a 2-foot change to equipment not visible by travelers on SR -58 would not impact scenic resources. The commenter also clarified that MCCs are equipment cabinets and not buildings. While the equipment would be located behind existing buildings, it could still be visible between buildings at certain viewing angles from SR-58. Panorama conducted a viewshed analysis to evaluate areas that would be visible from SR-58. The results of the viewshed analysis indicated that parts of the Proposed Project area would have low visibility from SR-58 and the facilities would be hardly perceptible. The impact was determined to be less than significant. No revisions are required.

**Response A.1-21**
The commenter noted the impact discussion of the visual character of the Project and whether the Project would substantially degrade the existing visual character or quality of public views omits the existing setting context of ongoing station operation and number of affected viewers accustomed to existing operations. The comment suggested temporary construction-related visual impact should be revised to no impact. While the existing setting and facilities are recognized, the analysis also considered that the construction would alter the customary view of the existing facilities. The impact was determined to be less than significant. No revisions are required.

**Response A.1-22**
The commenter noted the link to access the County of San Bernardino Circulation Elements-Overview document provided in section 3.1-9 is not accessible. The link associated with the reference provided on page 3.19-9 is revised as follows:

> County of San Bernardino. 2025. "Circulation Elements - Overview." https://sbcounty.maps.arcgis.com/apps/mapviewer/index.html?layers=35d78b44c06340e08d8c55c3b9120265

**Response A.1-23**
The commenter disagreed with the impact finding of "less than significant with mitigation incorporated" under Impact Question A regarding effects to special status species and stated the finding should be "less than significant". As described in Impact Analysis A) starting on page 3.4-29, although the Project site has been previously developed and does not directly provide suitable habitat for wildlife, direct effects to special status wildlife could occur if any species enter the construction area, specifically the staging area. In addition, indirect effects could occur to special status species that occur outside the Project area through increased noise or vehicle and equipment traffic generated by Project construction. Implementation of APMs and mitigation measures would reduce potentially significant impacts to less-than significant; therefore, the conclusion of less-than significant impact with mitigation incorporated is appropriate. No revisions are required.

**Response A.1-24**
The commenter recommended clarifying that the study area for vegetation communities also includes land cover types. The requested clarification does not affect the impact conclusions in the MND. The language on page 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> The study area for vegetation communities and land cover types for the Project encompasses the Project site plus a 1,000-foot radius (vegetation study area). The study area for flora includes a 100-foot radius from the Project (botanical study area). The study area for wildlife encompasses the area within the Hinkley Compressor Station fence line plus a 600-foot radius (biological study area, see Figure 3.4-1). The study areas are sufficient to evaluate both direct and indirect effects of the Project (e.g., noise, dust, etc.) based on the Project activities

**Response A.1-25**
The commenter suggested clarifying that data gathered to determine potential habitat for special status species during desktop surveys were refined during field surveys to better characterize and evaluate potential habitat only and not vegetation communities. The requested clarification does not affect the impact determinations in the MND. The language on page 3.4-2 is in ~~strikethrough~~ and underline as follows:

> Vegetation communities for the project were assessed through desktop analysis and information on species documented during floristic surveys. Prior to field surveys, the California Department of Wildlife (CDFW) Veg CAMP database for the California Deserts and Biographic Information and Observation System as part of the California Natural Diversity Database (CNDDB) was reviewed to determine potential habitat in the biological study area. These data were refined during field surveys to better characterize ~~vegetation communities~~ and evaluate available habitat for special status plant and wildlife species (Jacobs 2025).

**Response A.1-26**
The commenter clarified that botanical surveys included floristic surveys rather than transect surveys. The language on page 3.4-2 is revised to reflect the survey methodology in ~~strikethrough~~ and underline as follows:

> ~~Meandering botanical transect~~ Protocol-level floristic surveys were conducted on April 15 and 16, 2024, to map any special status plant species present within or adjacent to the proposed work or staging areas. The objective of the surveys was to generate a comprehensive list of all plant species that occur in the botanical study area and to map, photograph, and record data for any special status plant species found. Prior to surveys, pre-survey research and literature review were conducted to determine special status plants that may occur within the botanical study area.

**Response A.1-27**
The commenter clarified that surveys in Section 3.4 for Agassiz's desert tortoise were protocol-level and not focused surveys. The language on page 3.4-2 is revised for clarity to better reflect the methodology applied in ~~strikethrough~~ and underline as follows:

> Protocol-level ~~Focused~~ presence-absence surveys for Agassiz's desert tortoise were conducted on ~~April~~ March 12 and 13, 2024. Focused surveys included transects spaced at 10-meter (approximately 33 feet) intervals in all areas with unpaved surfaces inside the Hinkley Compressor Station fence line. At the request of the CDFW, six zone-of-influence transects spaced 100 feet apart from Hinkley Compressor Station to the east, north, west, and south were surveyed where possible.

**Response A.1-28**
The commenter requested clarification on the details of the completed reconnaissance surveys. The language on page 3.4-2 is revised to provide clarity with ~~strikethrough~~ and underline as follows:

> A Biological Resources Technical Report (Jacobs 2025) was prepared for the Project to document federal and state database desktop analysis and biological field surveys documenting vegetation, botanical, and biological resources that may occur within or adjacent to ~~the area within~~ the Project area. Reconnaissance field surveys were conducted on April 12, 2024, prior to protocol-level surveys to assess habitat suitability for special status species known to occur within 5-miles of the Project area. Appendix B presents the Biological Resources Technical Report and its supporting documents.

**Response A.1-29**
The commenter requested clarifications to the text of the MND for consistency with the biological resource survey methodology. The language on page 3.4-2 is revised with ~~strikethrough~~ and underline as follows:

> Wildlife surveys conducted for the project included protocol-level ~~focused~~ surveys for Agassiz's desert tortoise, habitat and breeding season surveys for burrowing owl, and protocol-level surveys and trapping for Mohave ground squirrels. Observations of common plant and animal species were recorded concurrently with these surveys. ~~The study area for wildlife (biological study area encompasses the area within the Hinkley Compressor Station fence line plus a 600-foot radius.~~

**Response A.1-30**
The commenter recommended revising the survey types and date for Agassiz's desert tortoise. The language on page 3.4-2 is revised for clarity with ~~strikethrough~~ and underline as follows:

> Protocol-level ~~Focused~~ presence-absence surveys for Agassiz's desert tortoise were conducted on ~~April~~ March 12 and 13, 2024. Focused surveys included transects spaced at 10-meter (approximately 33 feet) intervals in all areas with unpaved surfaces inside the Hinkley Compressor Station fence line.

**Response A.1-31**
The commenter explained that in addition to protocol-level surveys for Agassiz's desert tortoise, CDFW requested six zone-of-influence transects spaced 100 feet apart from Hinkley Compressor Station to the east, north, west, and south which were surveyed where possible. The language on page 3.4-2 is revised for clarity with ~~strikethrough~~ and underline as follows:

> Protocol-level ~~Focused~~ presence-absence surveys for Agassiz's desert tortoise were conducted on ~~April~~ March 12 and 13, 2024. Focused surveys included transects spaced at 10-meter (approximately 33 feet) intervals in all areas with unpaved surfaces inside the Hinkley Compressor Station fence line. At the request of the CDFW, six zone-of-influence transects spaced 100 feet apart from Hinkley Compressor Station to the east, north, west, and south were surveyed where possible.

**Response A.1-32**
The commenter suggested removing the explanation that burrowing owl transects were also surveyed for desert tortoise because the clarification suggested in comment A.1-31 is adequate to describe the surveys. The language on page 3.4-3 is revised for clarity in ~~strikethrough~~ and underline as follows:

> Burrowing owl surveys were initially conducted on April 12, 2024, to assess habitat. Breeding surveys were conducted during four events between May 15 and July 15, 2024. Breeding surveys included transects spaced at 30-meter (approximately 98 feet) intervals out to 180 meters (approximately 591 feet) on PG&E and private properties outside of the Hinkley Compressor Station fence line. Permission was not granted on one private property within the biological study area and therefore was not included in surveys. ~~Burrowing owl transects were also surveyed for evidence of desert tortoise.~~

**Response A.1-33**
The commenter recommended describing the landscape within the vegetation study area to clarify industrial and rural residential areas exist within the vegetation study area. The language on page 3.4-5 is revised for clarify in ~~strikethrough~~ and underline as follows:

> The landscape within vegetation study area consists of a mix of agricultural areas, developed ~~residential~~ industrial areas, and ~~small private property holdings~~ rural residential areas.

**Response A.1-34**
When describing the land uses surrounding the Hinkley Compressor Station, the commenter suggested revising "surrounding area" to "area surrounding the station". The language on page 3.4-5 is revised for clarity in ~~strikethrough~~ and underline as follows:

> The ~~surrounding area~~ area surrounding the station primarily consists of hardscaped or developed/landscaped agricultural land and ruderal or non-native species with some undeveloped desert scrub (Jacobs 2025; PG&E 2025).

**Response A.1-35**
The commenter clarified that species with the possibility of occurring are assessed within the biological and botanical study areas which extend beyond the Project area. The language on page 3.4-7 is revised for clarity in ~~strikethrough~~ and underline as follows:

> Habitat requirements for each special status species were evaluated to determine whether they may occur within the botanical and biological study areas and are summarized in Table 3.4-2. Species with the possibility of occurring in the ~~Project area~~ biological survey area and the botanical survey area are discussed below.

**Response A.1-36**
The commenter noted that Table 3.4-2 "Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area" includes both special status plants and special status wildlife species with potential to occur but special status plants and special status wildlife species have differing study areas. The commenter suggested revising the table title and clearly defining the study areas in the table.

The study areas were defined in the Draft MND for each species under the "Potential for Occurrence" column. Where needed, the study areas are revised to clearly define whether the species may occur in the applicable study area. Revisions to the MND text that are provided for clarity are included in Section 3. The title of Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical and Biological Study Areas**

**Response A.1-37**
The commenter stated that Lane Mountain milkvetch is unlikely to occur in the project area, which is devoid of vegetation and suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The MND recognized the unlikely occurrence of Lane Mountain milkvetch and the clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Lane Mountain milkvetch in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the ~~biological or~~ botanical study area~~s~~. None encountered during field surveys.

**Response A.1-38**
The comment recommended clarifying in Table 3.4-2 that desert cymopterus is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations

in the MND. The Potential for Occurrence description for desert cymopterus in Table 3.4-2 is revised in revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the ~~biological or~~ botanical study area~~s~~. None encountered during field surveys.

**Response A.1-39**

The commenter recommended clarifying in Table 3.4-2 that Mojave monkeyflower is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Mojave monkeyflower in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. One CNDDB occurrence recorded within 5 miles of the botanical study area reported in 1941. None encountered during field surveys.

**Response A.1-40**

The commenter recommended clarifying in Table 3.4-2 that Mojave menodora is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Mojave menodora in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-41**

The commenter recommended clarifying in Table 3.4-2 that spiny-hair blazing star is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for spiny-hair blazing star in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Minimal marginal to low quality suitable habitat is present in the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the ~~biological or~~ botanical study area~~s~~. None encountered during field surveys.

**Response A.1-42**
The commenter recommended clarifying in Table 3.4-2 that creamy blazing star is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for creamy blazing star in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of ~~the biological or~~ botanical study area~~s~~. None encountered during field surveys.

**Response A.1-43**
The commenter recommended clarifying in Table 3.4-2 that beaver dam breadroot is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area and that two California Natural Diversity Database (CNDDB) occurrences were recorded prior to 1937. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The description has been updated to clarify suitable habitat may exist within the botanical study area, outside of the proposed work area. No changes are required in reference to CNDDB occurrence as the potential for occurrence description already states two CNDDB occurrences were recorded within 5 miles of the botanical study area prior to 1937. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for beaver dam breadroot in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present in the botanical study area outside of the proposed work area. Two CNDDB occurrences within 5 miles of the ~~biological~~ botanical study area recorded prior to 1937. None encountered during field surveys.

**Response A.1-44**
The commenter recommended clarifying in Table 3.4-2 that Parish's phacelia is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Parish's phacelia in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the ~~biological or~~ botanical study area~~s~~. None encountered during field surveys.

**Response A.1-45**
The commenter recommended in Table 3.4-2 revising the potential for occurrence of California alkali grass from "unlikely" to "absent" due to the lack of evidence that suggested suitable

habitat is present. Because there is no evidence to suggest suitable habitat is present within the botanical study area, this revision is appropriate. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for California alkali in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> ~~**Unlikely**~~ **Absent.** No suitable habitat is present in the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the ~~biological or~~ botanical study area~~s~~. None encountered during field surveys.

**Response A.1-46**

The commenter recommended in Table 3.4-2 revising the potential for occurrence of western Joshua tree from "unlikely" to "absent" noting that the species is a large, visible tree and was not observed during surveys. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. Because there is suitable habitat present within the botanical study area, the potential for occurrence determination of unlikely is appropriate. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for western Joshua tree in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-47**

The commenter recommended in Table 3.4-2 clarifying that Colorado Desert larkspur is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Colorado Desert larkspur in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-48**

The commenter recommended clarifying in Table 3.4-2 that crowned muilla is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for crowned muilla in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-49**

The commenter recommended in Table 3.4-2 revising the potential for occurrence Joshua Tree poppy from "unlikely" to "absent" due to the lack of evidence that suggested suitable habitat is present. Because there is no evidence to suggest suitable habitat is present within the botanical study area, this revision is appropriate. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Joshua Tree poppy in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> ~~**Unlikely.**~~ **Absent.** Suitable habitat is not present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-50**

The commenter recommended in Table 3.4-2 clarifying that white pygmy-poppy is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for white pygmy poppy in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-51**

The commenter recommended in Table 3.4-2 clarifying that Mojave spineflower is unlikely to occur in the project area, which is devoid of vegetation. The commenter states suitable habitat exists only in the buffer area. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Mojave spineflower in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-52**

The commenter recommended in Table 3.4-2 updating the potential for occurrence of Mojave fishhook cactus from "unlikely" to "absent" due to the lack of evidence that suggested suitable habitat is present. The commenter noted Mojave fishhook cactus is a large perennial cactus. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. Because there is suitable habitat present within the botanical study area, the potential for

occurrence determination of unlikely is appropriate. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Mojave fishhook cactus in in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-53**

The commenter recommended in Table 3.4-2 revising the potential for occurrence of Mojave indigo-bush from "unlikely" to "absent" because suitable habitat exists in the buffer area of the botanical study area, not within the project area. The commenter noted that this is a large perennial species which is observable at any time and was not encountered during field surveys. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. Because there is suitable habitat present within the botanical study area, the potential for occurrence determination of unlikely is appropriate. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Mojave indigo-bush in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-54**

The commenter recommended in Table 3.4-2 revising the potential for occurrence Mojave menodora from to "unlikely" to "absent" because suitable habitat exists in the buffer area of the botanical study area, not within the project area. The commenter noted that this is a large perennial species which is observable at any time and was not encountered during field surveys. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. The description has been updated to clarify suitable habitat may exist within the botanical study area, outside of the proposed work area. Because there is suitable habitat present within the botanical study area, the potential for occurrence determination of unlikely is appropriate. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Mojave indigo- in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-55**

The commenter recommended in Table 3.4-2 revising the potential for occurrence of Torrey's box-thorn from to "unlikely" to "absent" because suitable habitat exists in the buffer area of the botanical study area, not within the project area. The commenter noted that this is a large

perennial species which is observable at any time and was not encountered during field surveys. As described in the Biological Resources Technical Report, there are 2 acres of natural vegetation within the Hinkley Compressor Station fence line that are outside of the proposed work area. Because there is suitable habitat present within the botanical study area, the potential for occurrence determination of unlikely is appropriate. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for Torrey's box-thorn in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys.

**Response A.1-56**

The commenter recommended providing clarification in Table 3.4-2 that the study area for monarch butterfly is the biological study area and not the botanical study area. The commenter adds that monarch butterfly is unlikely to occur in the project area because it is mostly devoid of vegetation. Consistent with Table 4 in the Biological Resources Technical Report, language has been added to clarify that monarch butterflies may migrate through the biological study area but are unlikely to remain for foraging and breeding. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for monarch butterfly in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Unlikely.** The biological study area is within range of the monarch butterfly. No CNDDB occurrences recorded within 5 miles of the biological study area. One milkweed species, climbing milkweed (*Funastrum cynanchoides* var. *hartwegii*), was observed in the biological study area. Monarch butterflies could migrate through the ~~botanical~~ biological study area but are unlikely to remain for foraging and breeding. None ~~individuals were not~~ observed ~~in the biological study area~~ during field surveys.

**Response A.1-57**

The commenter recommended an addition to Table 3.4-2 stating that there is no suitable habitat for desert tortoise present in the Project area because it is developed and disturbed. While it is recognized that the habitat within the developed portions of the station would not provide suitable habitat, burrows could occur in the staging area. While unlikely, if there were a breach in the fence, a desert tortoise could enter the work area given the surrounding habitat and carcasses previously observed along the fence line. The possibility of desert tortoise occurring was already recognized in the impact analysis and determination. The Potential for Occurrence description for desert tortoise in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> ~~**Unlikely**~~ **Possible**. Undeveloped portions of the biological study area may provide low-quality suitable habitat. Eight CNDDB occurrences ~~were~~ recorded within 5 miles of the biological study area. The proposed work area is developed/disturbed. ~~Project site is fenced and~~ Fencing likely precludes desert tortoise from entering the site. None observed ~~were identified in the biological study area~~ during field surveys.

**Response A.1-58**
The commenter recommended changing the potential of occurrence in Table 3.4-2 for burrowing owls from "possible" to "unlikely". The commenter noted although small mammal burrows which may be used by burrowing owls were found during surveys, no burrowing owls or burrows were encountered and no suitable habitat exists in the Project area. The potential for occurrence determination of possible was not revised because potential suitable habitat for burrowing owls exists in the biological study area. Additionally, burrowing owls could be indirectly impacted by Project construction. The clarification does not affect the impact analysis or determinations in the MND. The Potential for Occurrence description for burrowing owl in Table 3.4-2 is revised in ~~strikethrough~~ and underline as follows:

> **Possible.** Suitable breeding habitat may occur in the biological study area where ground squirrel burrows are found, outside of the proposed work area. Suitable foraging habitat is available in agricultural areas. Six CNDDB occurrences-reported within 5 miles of the biological study area. No burrows or burrowing owls encountered during field surveys.

**Response A.1-59**
The commenter recommended updating the potential occurrence for loggerhead shrike in Table 3.4-2 from "possible" to "unlikely" and states that while marginal foraging habitat for loggerhead shrike exists in the biological study area, the project site lacks suitable nesting or foraging habitat. The language has been updated to clarify suitable habitat may exist within the biological study area, outside of the Hinkley Compressor Station fenceline. The potential for occurrence determination of possible was not revised because potential suitable habitat for logger head exists in the biological study area. Although the Hinkley Compressor Station is developed, there are trees and shrubs present which could provide some habitat for nesting and foraging. No change to the MND text is required.

**Response A.1-60**
The commenter recommended updating the potential occurrence for Mohave ground squirrel in Table 3.4-2 from "possible to "unlikely" citing that none were encountered during the intensive protocol-level surveys conducted. The commenter states the project area is developed and lacks suitable habitat, although some potential habitat exists in the biological study area. The language has been updated to clarify suitable habitat may exist within the biological study area, outside of the Hinkley Compressor Station fenceline. The potential for occurrence determination of "possible" was not revised because potential suitable habitat for Mohave ground squirrel exists in the biological study area. Even if suitable habitat is not present within the proposed work area, Mohave ground squirrels could move through the fence and enter active construction areas. No change to the MND text is required.

**Response A.1-61**
The commenter states that the latter portion of the following statement is not found in the cited Biological Resources Technical Report: "While some habitat for special status plant species may occur within the biological study area, habitat quality is generally low due to existing development, agricultural uses, and fragmentation of native vegetation communities. (Jacobs 2025)". The commenter recommended revising this statement and/or removing the citation and

clarifying that the project area is mostly developed and disturbed. The statement is intended to provide a summary of information provided in the Biological Resources Technical Report regarding the overall habitat quality within the botanical and biological study areas. This statement is substantiated by discussions throughout the Biological Resource Technical Report regarding habitat quality; however, the language on page 3.4-20 is revised in ~~strikethrough~~ and underline as follows:

> While some habitat for special status plant species may occur within the biological study area habitat quality is generally low due to existing development, agricultural uses, and fragmentation of native vegetation communities. The Project area is mostly developed and disturbed. (Jacobs 2025).

**Response A.1-62**
The commenter recommended clarifying that reference populations areas for Barstow woolly sunflower, desert cymopteris, and beaver dam breadroot were visited and the language indicating surveys were conducted at the locations of the CNDDB recorded occurrences. This is summarized in the Biological Resources Technical Report. The language on page 3.4-20 is revised for clarity in ~~strikethrough~~ and underline as follows:

> ~~The~~ Several reference populations ~~locations of the CNDDB recorded occurrences~~ of Barstow woolly sunflower, desert cymopteris, and beaver dam breadroot were visited ~~also surveyed~~ as reference sites; ~~but~~ none of these species were ~~encountered~~ observed (Jacobs 2025).

**Response A.1-63**
The commenter stated the CNDDB occurrence data indicates that four of the largest historic populations of desert tortoise are mapped within 5 miles of the project site, not within 1-mile as stated. CNDDB occurrence data indicates that a portion of the mapped historic desert tortoise population areas are within 1 mile south of the Project site, thus no change to the MND is required.

**Response A.1-64**
In the discussion regarding CNDDB recorded occurrence for Mohave ground squirrel, the commenter states that CNDDB defines records and occurrences differently. The commenter noted that there were three records within 5 miles of the project site; one was from 1949, one from 1990, and one from 2012. The comment discusses that Mohave ground squirrel experts found the records from 1990 and 2012 to be questionable because they were visible sightings and not observations from more reliable methods such as live or camera trapping. While the methods for Mohave ground squirrel sitings in CNDDB may be less definitive than live or camera trapping, the records should not be discounted. No change to the MND is required.

**Response A.1-65**
The comment recommended correcting the text of APMs BIO-1 through BIO-4 to match exactly what PG&E proposed in the PEA, ensuring consistency and accuracy in the environmental documentation. APMs BIO-1, BIO-2, BIO-3, and BIO-4 on page 3.4-27 are revised in

~~strikethrough~~ and underline consistent with Response A.1-14, A.1-15, A.1-16, and A.1-17 as shown in Section 3 of this Final MND.

**Response A.1-66**
The commenter recommended revising the conclusion for Impact Question F under Section 3.4 to avoid introducing unnecessary uncertainty regarding conflict with habitat conservation plans. The language on page 3.8-6 is revised for clarity in ~~strikethrough~~ and underline as follows:

> The Project is located within the boundaries of the PG&E *Hinkley Groundwater Remediation Project HCP*. The Project would be implemented within the developed Hinkley Compressor Station site and would not conflict with habitat preservation or other requirements in the *Hinkley Groundwater Remediation Project HCP*. The Project would not ~~No~~ conflict with any habitat conservation plan. ~~is anticipated~~.

**Response A.1-67**
The commenter recommended correcting the impact statement to "no impact" rather than "less than significant," because the Project does not conflict with the 2022 Scoping Plan for greenhouse gas (GHG) emissions. The comment ignores the emissions of GHG from use of generators during construction. While the GHG emissions during construction would be less than significant as documented in the Draft MND, the emissions would occur and the MND conclusion of a less than significant impact is correct.

**Response A.1-68**
The commenter recommended unchecking the "Potentially Significant Impact" designation in the Recreation section, as the discussion concludes there would be "No Impact." The Environmental Impacts summary table on page 3.16-1 under Impact Question is revised for consistency with the impact determination in the text as follows:

| | | | | |
|---|---|---|---|---|
| a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ~~☒~~ | ☐ | ☐ | ☒ |

**Response A.1-69**
The commenter noted the correct water board jurisdiction is the Lahontan Regional Water Quality Control Board (LRWQCB), not the Central Valley Regional Water Quality Control Board (CRWQCB). All references to the regional water board have been updated to Lahontan Regional Water Quality Control Board (LRWQCB) throughout the draft ISMND as indicated in Chapter 3 of this Final MND.

**Response A.1-70**
The commenter recommended removing Table 3.19-3 and its introductory statement because the section does not discuss how APM GHG-1 relates to Utilities and Service Systems. Because

APM GHG-1 reduces impacts from the generation of solid waste, it is not removed from the Utilities and Service Systems section and the impact analyses under Impact Questions D and F are revised to clearly identify APM GHG-1 as reducing the impacts from solid waste generation.

**Response A.1-71**
The commenter stated that impact determination of "less than significant" under Impact Question B in section 3.19, Utilities and Servies Systems contradicts the preceding language that state the Project would have sufficient water supplies. The comment ignores that water would be used during construction for dust control and concrete and potentially fire suppression. Although water used during construction would be minimal as documented in the Draft MND, water use would occur; therefore, the MND conclusion of a less than significant impact is correct.

**Response A.1-72**
The commenter noted APM BIO-1 should match PG&E's APMs in the PEA. Consistent with Response A.1-14, APM BIO-1 is revised in the Mitigation Monitoring and Reporting Program in Appendix C.

**Response A.1-73**
The commenter noted APM BIO-1 should match PG&E's APMs in the PEA. See Response A.1-14, and A.1-65. Final APMs are included in Appendix C.

**Response A.1-74**
The comment noted APM BIO-2 should match PG&E's APMs in the PEA. See Response A.1-15 and A.1-65. Final APMs are included in Appendix C.

**Response A.1-75**
The comment noted APM BIO-2 should match PG&E's APMs in the PEA. See Response A.1-15 and A.1-65. Final APMs are included in Appendix C.

**Response A.1-76**
The commenter noted APM BIO-4 should match PG&E's APMs in the PEA. See Response A.1-16 and A.1-65. Final APMs are included in Appendix C.

**Response A.1-77**
The comment states that APM BIO-4 does not require CPUC approval of training material. While it is noted that the APM text does not discuss CPUC approval, CPUC has oversight of the APMs applied and will review the training materials to verify compliance.

**Response A.1-78**
The comment states that APM CUL-1 does not require CPUC approval of training material. While it is noted that the APM text does not discuss CPUC approval, CPUC has oversight of the APMs applied and will review the training materials to verify compliance.

**Response A.1-79**
The comment recommended revising APM CUL-2 to include coordination with PG&E's Cultural Resource Specialist and CPUC, ensuring proper notification and documentation procedures for inadvertent discoveries. It is noted that CPUC has oversight ability and is responsible for verifying compliance with the mitigation measures, including stop work authority, if necessary. As discussed in comment responses B.1-1, B.1-2, and B.1-4, APM CUL-2 has been superseded by Mitigation Measure CUL-2. The requirements and timing of APM CUL-2 on page 5-16 in Table 5.1-1 have been incorporated in Mitigation Measure CUL-2 and is revised in ~~strikethrough~~ and underline as follows:

> During Construction: (1) Work within 100 feet of discovered resources stops, (2)The required personnel, PG&E Cultural Resource Specialist, and CPUC ~~agencies~~ are notified, (3) Adequate reporting and documentation occurs, (4) Significant resources are completely avoided or mitigated from impacts, and (5) Work only resumes near the resource after required procedures are complete in coordination with~~, to the satisfaction of~~ CPUC.

**Response A.1-80**
The comment recommended revising the timing of APM CUL-3 to include proper notification with PG&E's Cultural Resource Specialist and CPUC and ensuring treatment or disposition is complete as determined by the County Coroner, or landowner and Most Likely Descendant (MLD). The requirements and timing of APM CUL-3 on page 5-16 in Table 5.1-1 is revised in ~~strikethrough~~ and underline as follows:

> During Construction: (1) Work within 100 feet of discovered resources stops, (2)The required personnel, PG&E Cultural Resource Specialist, and CPUC ~~agencies~~ are notified, (3) Adequate reporting and documentation occurs, (4) Significant resources are completely avoided or mitigated from impacts, and (5) Work only resumes near the resource after treatment or disposition is complete as determined by the County Coroner, or landowner and MLD as appropriate ~~required procedures are complete to the satisfaction of CPUC~~.

**Response A.1-81**
The comment noted that APM PAL-1 does not address monitoring or reporting and recommended clarifying that it is not applicable to archaeological monitoring. The requirements and timing of APM PAL-1 are clarified on page 5-18 in Table 5.1-1 in ~~strikethrough~~ and underline as follows:

> During Construction: N/A Archaeological monitoring and reporting.

**Response A.1-82**
The comment recommended clarifying that APM PAL-3 addresses paleontological monitoring as opposed to archaeological monitoring. APM PAL-3 requirements are clarified in Table 5.1-1 is revised in ~~strikethrough~~ and underline as follows:

> During Construction: ~~Archaeological~~ Paleontological monitoring and reporting.

**Response A.1-83**
The comment states that the paleontological work is to be completed by the qualified paleontologist and requests removal of to the satisfaction of CPUC. The text stating "to the satisfaction of CPUC" is removed as shown below; however, it is noted CPUC has oversight for the project and retains stop work authority, if necessary:

> During Construction: (1) Work within 100 feet of discovered resources stops, (2) The required personnel and agencies are notified, (3) Adequate reporting and documentation occurs, (4) Significant resources are completely avoided or mitigated from impacts, and (5) Work only resumes near the resource after required procedures are complete~~, to the satisfaction of CPUC~~.

**Response A.1-84**
The commenter states APM GHG-1 is informed by CPUC's Draft Environmental Measures. The requirements and timing of APM GHG-1 on page 5-20 in Table 5.1-1 is revised to reference APM GHG-1 in ~~strikethrough~~ and underline as follows:

> During Construction: Implement GHG minimization measures in adherence with APM GHG-1.~~CPUC's Draft~~ ~~Environmental Measures.~~

**Response A.1-85**
The commenter states APM HAZ-1 does not include approval of training material. While it is noted that the APM text does not discuss CPUC approval, CPUC has oversight of the APMs applied and will review the training materials to verify compliance.

**Response A.1-86**
The comment recommended replacing text and clarifying that APM NOI-1 addresses noise management practices. The requirements and timing of APM NOI-1 are corrected to reference the noise practices on page 5-24 in Table 5.1-1 is revised in ~~strikethrough~~ and underline as follows:

> During Construction: ~~Archaeological monitoring and~~ ~~reporting~~ Implement standard noise-reducing construction practices.

### 2.3.2 Tribal Governments

This section contains responses to comments received from tribal governments. Responses follow the comment letter.

Gmail

Colleen Lavery <colleen.lavery@panoramaenv.com>

## RE: [EXTERNAL] AB52: Pacific Gas and Electric S-238 Hinkley Compressor Station Electrical Upgrades Project, Public Utilities Commission [CA-CPUC-2025-1]

1 message

**Kristen Tuosto** <Kristen.Tuosto@sanmanuel-nsn.gov> Fri, Nov 21, 2025 at 1:19 PM
To: Colleen Lavery <colleen.lavery@panoramaenv.com>
Cc: "Forsythe, John" <John.Forsythe@cpuc.ca.gov>, Susanne Heim <susanne.heim@panoramaenv.com>

Hello Colleen,

I realized when we received the DEIR that I forgot to send out YSMN's recommended mitigation measures for this project.

After reviewing the cultural report and our own knowledge of this specific project area, YSMN has low concerns for the project encountering Tribal Cultural Resources.

If possible, can the mitigation in the DEIR be updated to include our recommended language?

**CUL MMs**

1. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. B.1-1

2. If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly. B.1-2

3. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project. B.1-3

**TCR MMs**

1. The Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN) shall be contacted, as detailed in CUL-1, of any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site. B.1-4

2. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project. B.1-5

Thank you,

Kristen Tuosto

---

**From:** Colleen Lavery <colleen.lavery@panoramaenv.com>
**Sent:** Wednesday, July 9, 2025 9:58 AM
**To:** Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>
**Cc:** Forsythe, John <John.Forsythe@cpuc.ca.gov>; Susanne Heim <susanne.heim@panoramaenv.com>
**Subject:** Re: [EXTERNAL] AB52: Pacific Gas and Electric S-238 Hinkley Compressor Station Electrical Upgrades Project, Public Utilities Commission [CA-CPUC-2025-1]

Hello Kristen Tuosto,

On behalf of CPUC, please see attached the S-238 Hinkley Compressor Station Electrical Upgrades Project Cultural Resources Assessment.

There was no geotechnical report due to the limited depth of disturbance which is defined in the cultural resources report.

Please let me know if you have any questions.

Thanks!

Colleen Lavery, PMP, Director
Panorama Environmental, Inc.
Reno, NV

c.775.671.5662
www.panoramaenv.com

### Response to Letter B.1-1 – B.1 – 5 - Yuhaaviatam of San Manuel Nation

**Response B.1-1**

The commenter requests a 60-foot avoidance buffer in the event of archaeological discoveries and that a qualified archaeologist who meets the Secretary of Interior standards assess the find. The comment also requests that the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) be contacted and provided with relevant information for Tribal input regarding significance and treatment.

The 60-foot buffer for avoidance of any cultural resource discoveries is less than the 100-foot avoidance buffer included in APM CUL-2. APM CUL-2 is superseded by Mitigation Measure CUL-2 in response to the request to add assessment of discoveries by an archaeologist who meets Secretary of Interior standards and contact of YSMN regarding any pre-contact finds in response to the comment. Revisions to the MND are as shown below:

> **APM CUL-2: Inadvertent Cultural Resource Discoveries <u>(Superseded)</u>**
>
> ~~If unanticipated cultural resources are identified during Project construction, the following procedures will be initiated:~~
>
> - ~~• All ground-disturbing construction activities within 100 feet of the discovery will halt immediately.~~
> - ~~• The construction crew will protect the discovery from further disturbance until a qualified archaeologist has assessed it.~~
> - ~~• The Construction Supervisor will contact the Project Environmental Inspector and the PG&E Cultural Resource Specialist immediately.~~
>
> ~~The PG&E Cultural Resources Specialist will coordinate with the CPUC and NAHC, as appropriate. If the discovery can be avoided or protected and no further impacts will occur, then the resource will be documented on DPR 523 forms, and no further effort will be required. If the resource cannot be avoided and may be subjected to further impacts, qualified personnel will evaluate the significance of the discovery, in accordance with the State laws outlined previously; personnel will implement data recovery or other appropriate treatment measures, if warranted. A qualified historical archaeologist will complete an evaluation of historic period resources, while evaluation of precontact resources will be completed by a qualified archaeologist specializing in California prehistoric archaeology.~~
>
> ~~Evaluations may include archival research, oral interviews, and/or field excavations to determine the full depth, extent, nature, and integrity of the deposit.~~
>
> **<u>Mitigation Measure CUL-2: Inadvertent Cultural Resource Discoveries</u>**
>
> <u>If unanticipated cultural resources are identified during construction, the following procedures will be initiated:</u>

- All ground-disturbing construction activities within 100 feet of the discovery will halt immediately.
- A qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find.
- The construction crew will protect the discovery from further disturbance until a qualified archaeologist has assessed it.
- The construction supervisor will immediately contact the project environmental inspector and the PG&E cultural resource specialist ~~immediately~~.

Work on the other portions of the project outside of the buffered area may continue during this assessment period. The PG&E cultural resources specialist will coordinate with the CPUC and NAHC, as appropriate. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Tribal input will be provided within 10 days. If the discovery can be avoided or protected and no further impacts will occur, then the resource will be documented on DPR 523 forms, and no further effort will be required. If the resource cannot be avoided and may be subjected to further impacts, qualified personnel will evaluate the significance of the discovery in accordance with the state laws outlined previously; personnel will implement data recovery or other appropriate treatment measures, if warranted. A qualified historical archaeologist will complete an evaluation of historic period resources, while evaluation of precontact resources will be completed by a qualified archaeologist specializing in California prehistoric archaeology.

Evaluations may include archival research, oral interviews, and/or field excavations to determine the full depth, extent, nature, and integrity of the deposit.

If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, a Cultural Resource Monitoring and Treatment Plan shall be prepared by the archaeologist in coordination with YSMN, and all subsequent finds shall be subject to the Cultural Resource Monitoring and Treatment Plan. The Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project ground disturbing activities, should YSMN elect to place a monitor on-site.

**Response B.1-2**

The commenter requested that mitigations related to cultural resources include measures to protect pre-contact cultural resources discovered during project activities. If avoidance is not possible, the commenter recommended a Cultural Monitoring and Treatment Plan be developed by a qualified archaeologist and provided to YSMN for review.

This comment is addressed through revisions incorporated in Mitigation Measure CUL-2 as indicated in Response B.1-1.

**Response B.1-3**
The commenter requested that mitigations related to cultural resources include measures to protect any discoveries of human remains/funerary objects. The commenter requested that project activities cease within a 100-foot buffer of any discoveries of human remains/funerary objects and the County Coroner be contacted pursuant to State Health and Safety Code §7050.5.

APM CUL-3 includes equal or greater protection of human remains to the language suggested by YSMN, therefore no change to APM CUL-3 is required.

**Response B.1-4**
The commenter requested that mitigations related to cultural resources include communication and coordination with YSMN if pre-contact cultural resources are discovered during project activities. If such resources are discovered, the commenter requested a Cultural Resources Monitoring and Treatment Plan be developed and implemented by the qualified archaeologist in coordination with YSMN. The commenter requested the Cultural Resources and Monitoring Plan include continued monitoring.

This comment is in the language included in Mitigation Measure CUL-2 as provided in Response B.1-1.

**Response B.1-5**
The commenter requested archaeological/cultural documents related to the project, including isolate records, site records, survey reports, testing reports, etc. be provided to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

This comment is addressed in Mitigation Measure CUL-2 where it states,“ Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment“. The language recommended in this comment is duplicative of the request that information on any precontact find be supplied to YSMN and no additional revisions to Mitigation Measure CUL-2 are required.

# 3 Revisions to the IS/MND

As a result of comments, some changes have been made to the previously published text of the IS/MND. Changes include minor corrections made to improve writing clarity, grammar, and consistency; clarifications, additions, or deletions resulting from specific responses to comments; and text changes to update information in the IS/MND. These text revisions are included following each response in Section 2.4 above that warranted a revision as well as summarized below. The specific additions and deletions use the following conventions:

- Text deleted from the IS/MND is shown in ~~strike-out~~ text.
- Text added to the IS/MND is shown as <u>underlined</u> text.

In addition to the changes included in Section 2.4, the following revisions are also made in response to changes in the project schedule.

## 3.1 Changes to Acronyms and Abbreviations

On page i, the following revisions are included in the Acronyms and Abbreviations list:

~~CRWQCB Central Valley Regional Water Quality Control Board~~

<u>LRWQCB Lahontan Regional Water Quality Control Board</u>

## 3.2 Changes to MND Introduction

On page MND-3, the following revision is included under the heading "Project Description":

> The Proposed Project would be in San Bernadino County at PG&E's Hinkley Compressor Station and would involve replacing and upgrading existing electrical distribution equipment by removing and replacing the station's switchgear, motor control (MCC), and a load center would be replaced or modified and connecting conduit and new or replacement cable would be installed between the switchgear and MCC locations. No new sub transmission lines or substations would be constructed as part of the Proposed Project. PG&E's stated objectives of the Proposed Project are to <u>align with current PG&E and industry</u> ~~ensure compliance with CPUC G.O. 95~~ standards and address <u>safety and</u> reliability concerns related to the condition of the compressor station. Construction of the Proposed Project is preliminarily scheduled to begin in 2026. The construction start date would depend on CPUC approval and construction would last approximately 23 months.

On page MND-3, the following revision is included under the heading "Environmental Determination":

> The CPUC prepared this IS to determine if the Proposed Project would result in any significant adverse effects on the environment. The analysis presented in the IS is based on the significance criteria in Appendix G of the CEQA Guidelines. The IS relies on information in PG&E's Application filed on April 9, 2025; PG&E's responses to ~~deficiency reports and~~ data requests; the CPUC's independent analysis; and other environmental analyses.

On page MND-5, the following revision is included under the heading "Cultural Resources":

> **Mitigation Measure CUL ~~Cultural~~ 1: Archaeological Monitoring**
>
> During trenching and excavation activities in soil or sediment that is not imported or not previously disturbed, a tribal monitor from one tribe to be identified by the lead agency, shall be invited to be retained by PG&E to inspect for potential archaeological deposits or Tribal cultural resources. In the event of the discovery of archaeological deposits or Tribal cultural resources a tribal representative shall have the authority to halt work within 100 feet of the discovery, and CPUC shall be notified within 48 hours of the discovery. All procedures in Mitigation Measure ~~APM~~ CUL-2 shall be implemented during investigation of the resource.

On page MND-5 the following revision is included under the heading "Cultural Resources":

> **Mitigation Measure CUL-2: Inadvertent Cultural Resource Discoveries**
>
> If unanticipated cultural resources are identified during construction, the following procedures will be initiated:
>
> - All ground-disturbing construction activities within 100 feet of the discovery will halt immediately.
> - A qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find.
> - The construction crew will protect the discovery from further disturbance until a qualified archaeologist has assessed it.
> - The construction supervisor will immediately contact the project environmental inspector and the PG&E cultural resource specialist.
>
> Work on the other portions of the project outside of the buffered area may continue during this assessment period. The PG&E cultural resources specialist will coordinate with the CPUC and NAHC, as appropriate. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Tribal input will be provided within 10 days. If the discovery can be avoided or protected and no further impacts will occur, then the resource will be

documented on DPR 523 forms, and no further effort will be required. If the resource cannot be avoided and may be subjected to further impacts, qualified personnel will evaluate the significance of the discovery in accordance with the state laws outlined previously; personnel will implement data recovery or other appropriate treatment measures, if warranted. A qualified historical archaeologist will complete an evaluation of historic period resources, while evaluation of precontact resources will be completed by a qualified archaeologist specializing in California prehistoric archaeology.

Evaluations may include archival research, oral interviews, and/or field excavations to determine the full depth, extent, nature, and integrity of the deposit.

If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, a Cultural Resource Monitoring and Treatment Plan shall be prepared by the archaeologist in coordination with YSMN, and all subsequent finds shall be subject to the Cultural Resource Monitoring and Treatment Plan. The Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project ground disturbing activities, should YSMN elect to place a monitor on-site.

In Section 3.4, page 3.4- and on page MND-3 of the introductory section, the following revision is included under the heading titled "Mitigation Measures", subheading "Biological Resources":

**Mitigation Measure BIO ~~Bio~~ -1: Desert Tortoise and Mohave Ground Squirrel**

Preconstruction clearance surveys for any burrows potentially containing desert tortoise or Mohave ground squirrel burrows shall be completed by a qualified biologist within 500 feet ~~meters (approximately 1,600 feet)~~ of the project footprint prior to the onset of construction activities. If the burrow has any sign of recent use by a desert tortoise or Mohave ground squirrel, the burrow shall be monitored by a qualified biologist for signs of activity. No construction activity shall be allowed within 200 feet ~~meters (approximately 656 feet)~~ of a burrow containing desert tortoise or Mohave ground squirrel without obtaining approval from CDFW. All project activities within 500 feet ~~meters (approximately 1,600 feet)~~ of an occupied desert tortoise or Mohave ground squirrel burrow shall be monitored by a qualified biologist to ensure avoidance of the species.

In Section 3.4, page 3.4-32 and 3.4-33 and on page MND-4 of introductory section, the following revision is included under the heading titled "Mitigation Measures", subheading "Biological Resources":

**Mitigation Measure BIO ~~Bio~~ -2: Desert Kit Fox**

If an active, non-natal den is detected within the project footprint, then a 100-foot ~~50 meters (approximately 165 feet)~~ construction exclusion zone will be established, and passive relocation techniques may be used as determined by the qualified biologist. The buffer area will be maintained until passive relocation is successfully completed. If an

active natal den is detected within the project footprint a 500-foot ~~meters~~ ~~(approximately 656 feet)~~ construction exclusion zone will be established, and passive relocation will not be implemented until monitoring confirms that the den is no longer in active use as a natal den.

On page MND-4 of introductory section, the following revision is included under the heading titled "Mitigation Measures", subheading "Biological Resources":

**Mitigation Measure BIO ~~Bio~~ -3: Burrowing Owl**

Preconstruction clearance surveys for active burrowing owl burrows shall be completed by a qualified biologist prior to the onset of construction activities to minimize impacts from construction. Surveys shall be conducted according to CDFW guidelines (California Department of Fish and Game (CDFG) 2012) or updated guidelines should they become available). If burrows are located, avoidance buffers shall be determined in coordination with CDFW and based on the recommendations below:

- From April 1-August 15, buffers shall be 200 meters (approximately 656 feet) for low levels of disturbance (i.e., vehicles, worker presence), and 500 meters (approximately 1,600 feet) for moderate to high levels of disturbance (i.e., trenching, demolition, etc.)
- From August 16-October 15, buffers shall be 200 meters (approximately 656 feet) for low and moderate levels of disturbance and 500 meters (approximately 1,600 feet) for high levels of disturbance.
- From October 16-March 31, buffers shall be 50 meters (approximately 165 feet) for low levels of disturbance; be 200 meters (approximately 656 feet) for moderate levels of disturbance, and 500 meters (approximately 1,600 feet) for high levels of disturbance.
- Binocular surveys may be substituted for protocol field surveys on private lands adjacent to the project site only when PG&E has made reasonable attempts to obtain permission to enter the property for survey work but was unable to obtain such permission.

Reduced buffers may be requested by the qualified biologist due to existing noise and disturbance levels at the compressor station. Buffer reductions would require CDFW approval. No burrowing owl may be relocated without first obtaining a CDFW incidental take permit.

On page MND-5 of introductory section, the following revision is included under the heading titled "Mitigation Measures", subheading "Biological Resources":

**Mitigation Measure BIO ~~Bio~~ -4: Invasive Species**

Any ground- or vegetation-disturbing equipment and tools will be cleaned free of mud, soil, and plant material before entering the project site, and any time after driving off

pavement outside the project site. Cleaning can be through car washes, compressed air, pressure washes, brushes, or similar equipment.

## 3.3 Changes to Section 2, Project Description

The first paragraph under 2.1, Project Location on page 2-1 is revised as follows:

> The Hinkley Compressor Station is at 35863 Fairview Road in the community of Hinkley in San Bernardino County, California (Figure 2-1). The main compressor station entrance on Fairview Road is approximately 1 mile south of State Route (SR) 58. The compressor station is approximately 1 mile west of the city limits of the city of Barstow. The Project area is on an approximate 160-acre parcel adjacent to Community Boulevard and Fairview Road. The Project site consists of the 64-acre fenced compressor station, within which the Project ~~would include~~ would be implemented in a 15.8-acre work area and a 9.7-acre staging area (Figure 2-2 and Figure 2-3).

The second paragraph under 2.6.1, Site Preparation on page 2-7 is revised as follows:

> **Surveying and Staking**
>
> The Project site would be surveyed to locate and identify new underground conduit locations and the MCC-9 location, using paint on the ground or installing horizonal and vertical stakes. Typical surveying and staking techniques and hand equipment would be used. PG&E also would clearly mark any sensitive biological, cultural, paleontological, or hydrological resources identified during pre-construction surveys or monitoring during construction, where appropriate, to prevent construction activities and equipment from entering those areas per the requirements of applicant proposed measures (APMs) and any required mitigation measures.

Beginning at the first paragraph under 2.6.2, Temporary Construction Staging on page 2-8 is revised as follows:

> The Project would use an approximately 9.7-acre staging area within the compressor station (Figure 2-3). The staging area currently is used regularly for compressor station staging and laydown activities. The staging area would use berms or other methods to contain excess water from concrete wash water. ~~The soil in the staging area would be compacted.~~ Soil stockpiles may be in the staging area.
>
> Project staging activities would avoid landscaping trees in the staging area. Staging would occur in the open areas and would not occur in the existing structure or areas under the landscaping trees. No tree or other landscaping or structure removal would be required in the area. Staging may occur in the work area as well. Site preparation does not include grading or other site stabilization activities to prepare construction staging areas.

The third paragraph under 2.6.3, Temporary Power Setup on page 2-8 is revised as follows:

> Transitioning between permanent and temporary power, as well as disconnecting equipment for replacement, would follow ~~strict~~ safety protocols, including lockout and tagout procedures and operational clearances. Replacement activities would involve carefully planned outages, removal of old equipment, installation of new components, and coordinated re-energizing.

The first paragraph under 2.6.12, Hazardous Materials and Management on page 2-11 is revised as follows:

> Hazardous materials, such as fuels, lubricants, cleaning solvents, and other chemicals would not be stored on site, and all fueling and storage would occur off-site. Natural gas from within the station will be used to fuel the temporary PERP generators. Fuel, grease, and fluids that would be needed for construction equipment operations would be on site periodically; these would be handled in keeping with the Project's APMs and BMPs that address their proper use, storage, and cleanup, if warranted.

The first paragraph under 2.6.15, Construction Workforce, Equipment, Traffic, and Schedule (Construction Traffic) on page 2-15 is revised as follows:

> **Construction Traffic**
>
> Construction crews (worker commutes) would travel to and from the Project site via ~~personal~~ light-duty vehicles ~~and light-duty~~ or trucks. Worker daily commute trips and vendor or delivery truck trips would total approximately 20 miles roundtrip. Equipment would be staged on site in a work area within the station or be brought to the work area daily on work trucks or trucks with trailers.

Table 2.6-9 Summary Table of Applicant Proposed Measures under Section 2.6.18, Applicant Proposed Measures on page 2-15 is revised as follows:

> **APM AIR-1: Dust Control During Construction**
>
> PG&E will control fugitive dust by using BMPs, as follows:
>
> - Water or cover ~~all exposed surfaces~~ with coarse rock all exposed surfaces with the potential to generate dust with coarse rock, to reduce the potential for airborne dust from leaving ~~to leave~~ the ~~Project~~ site.
> - Limit the simultaneous occurrence of more than two ground-disturbing construction phases on the same area at any one time. Phase activities to reduce the amount of disturbed surfaces at any one time.
> - Cover all haul trucks entering/leaving the site and trim their loads, as necessary.

- Use wet power vacuum street sweepers to sweep all paved access roads, parking areas, staging areas, and public roads adjacent to the project site daily (at minimum) during construction. Do not use dry power sweeping.
- Wash off all trucks and equipment, including their tires, prior to leaving the project site.
- Apply gravel or non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas at the project site.
- Water and/or cover soil stockpiles daily.
- Plant vegetative ground cover in disturbed areas as soon as possible and water it appropriately until vegetation is established.
- Limit all vehicle speeds to 15 miles per hour (mph) or less on unpaved areas.
- Implement dust monitoring in compliance with the standards of MDAQMD.
  - Halt construction during any periods when wind speeds exceed 50 mph.

Table 2.6-9 Summary Table of Applicant Proposed Measures under Section 2.6.18, Applicant Proposed Measures beginning on page 2-16 is revised as follows:

**APM BIO-1: Protect Nesting Birds**

~~For any~~ If construction is to occur ~~scheduled~~ during the ~~typical migratory bird or raptor~~ avian nesting season (March 1 through August 15), a preconstruction migratory bird and raptor nesting surveys ~~would~~ will be performed by a qualified biologist who is familiar with local avian species and nesting birds. Surveys ~~would~~ will occur only in publicly accessible areas and~~/or~~ where PG&E has existing access.~~;~~ ~~Private~~ private property ~~would~~ will not be ~~used for access~~ accessed and will instead be observed from adjacent accessible areas. ~~If active nests containing eggs or young are found, an appropriate nest exclusion zone would be established to prevent disturbance to the nest.~~

~~Migratory bird and raptor nesting preconstruction~~ Preconstruction nesting bird surveys ~~and avoidance measures would~~ will be performed in accordance with PG&E's Nesting Bird Management Plan. The preconstruction survey will cover a radius of 200 feet for nonlisted raptors and 100 feet for nonlisted passerines from project locations that will be actively worked at in the near term. The survey will cover all affected areas where ground disturbance is required. If any active nests containing eggs or young are found, an appropriate nest exclusion zone will be established by the PG&E biologist in accordance with PG&E's Nesting Bird Management Plan. No heavy equipment will be operated in this exclusion zone until the biologist has determined that the nest is no longer active, and the young have fledged. If it is not practicable to avoid work in an exclusion zone around an active nest, work activities will be modified to minimize disturbance of nesting birds but may proceed in these zones at the discretion of the biologist. As appropriate, the biologist will monitor work activities in these zones daily or periodically when construction is occurring and assess their effect on the nesting birds. If the biologist determines that particular activities pose a high risk of disturbing an active nest, the biologist will recommend additional, feasible measures to minimize

the risk of nest disturbance. If work cannot proceed without disturbing the nesting birds, or signs of disturbance are observed by the monitor, work may need to be halted or redirected to other areas until the nesting and fledging is completed or the nest has otherwise failed for reasons not related to construction.

**APM BIO-2: Protect wildlife trapped in trenches or steep-walled holes**

~~All excavated holes/trenches that are not filled at the end of a workday would be covered, or a wildlife escape ramp would be installed to prevent the inadvertent entrapment of wildlife species. Excavated holes/trenches left overnight would be inspected prior to the onset of work. If wildlife is found, work would pause until the PG&E biologist is able to remove and relocate the animal.~~

Field crews will fit open trenches or steep-walled holes with escape ramps of plywood boards or sloped earthen ramps at each end if left open overnight. Field crews will search open trenches or steep-walled holes every morning prior to initiating daily activities to ensure wildlife is not trapped. If any wildlife is found, work will stop, and the PG&E biologist will be contacted to move the animal out of harm's way.

**APM BIO-3: Preconstruction Surveys**

Preconstruction biological clearance surveys ~~would~~ will be completed by a qualified biologist prior to ~~the onset of~~ construction activities beginning and will occur throughout the project site to minimize impacts on wildlife.

**APM BIO-4. Worker Environmental Awareness Program – Biological Resources Portion**

A ~~Worker Environmental Awareness Program~~ worker environmental awareness program (WEAP) ~~would~~ will be prepared for the project ~~and implemented to educate construction and O&M workers on site-specific biological and non-biological resources and proper work practices to avoid harming wildlife during construction or O&M~~ to communicate environmental issues and appropriate work practices specific to the project to all construction field personnel before they begin work on the project. A PG&E biologist or designee familiar with resources in the area will deliver the WEAP biological resources portion. Training will include a discussion of the potential for nesting birds and possible buffers, along with the requirement to protect wildlife from becoming trapped in trenches or steep-walled holes. Training will include information about federal laws protecting nesting birds. ~~The WEAP would include training which addresses the requirements for protecting wildlife from entrapment in open trenches or steep-walled holes and nesting birds.~~ A copy of the training sign-in sheets documenting participation in the training will be provided to the CPUC.

Table 2.6-9 Summary Table of Applicant Proposed Measures under Section 2.6.18, Applicant Proposed Measures beginning on page 2-18 is revised as follows:

**APM CUL-1: Worker Environmental Awareness Training Program, Cultural Resources Portion**

A worker environmental awareness training program (WEAP) will be prepared to communicate environmental issues and appropriate work practices specific to the Project to all construction field personnel before they begin work on the Project performing excavation or trenching activities. This training will be administered by a qualified cultural resource professional, either as a standalone training or as part of the overall environmental awareness training ~~that will be~~ required ~~for~~ by the Project~~. This training~~ and may be recorded for use in subsequent training sessions. The WEAP program will be provided separately to CPUC staff ~~before the start of~~ prior to construction. The WEAP will address, among other topics, ~~the following topics~~ at a ~~mimimum~~ minimum:

- A review of archaeology, history, precontact, and Native American cultures associated with historical resources ~~in the Project vicinity~~ near the project
- A review of applicable local, State, and federal ordinances, laws, and regulations pertaining to historic preservation
- A discussion of procedures to be followed if unanticipated cultural resources are discovered during ~~Project~~ implementation of the project
- A discussion of disciplinary ~~action~~ and other actions that can be taken against persons violating historic preservation laws and PG&E policies
- A statement by the construction company or applicable employer, agreeing to abide by the WEAP, PG&E policies, and other applicable laws and regulations.

**APM CUL-2: Inadvertent Cultural Resource Discoveries (Superseded)**

~~If unanticipated cultural resources are identified during Project construction, the following procedures will be initiated:~~

- ~~• All ground-disturbing construction activities within 100 feet of the discovery will halt immediately.~~
- ~~• The construction crew will protect the discovery from further disturbance until a qualified archaeologist has assessed it.~~
- ~~• The Construction Supervisor will contact the Project Environmental Inspector and the PG&E Cultural Resource Specialist immediately.~~

~~The PG&E Cultural Resources Specialist will coordinate with the CPUC and NAHC, as appropriate. If the discovery can be avoided or protected and no further impacts will occur, then the resource will be documented on DPR 523 forms, and no further effort will be required. If the resource cannot be avoided and may be subjected to further impacts, qualified personnel will evaluate the significance of the discovery, in accordance with the State laws outlined previously; personnel will implement data recovery or other appropriate treatment measures, if warranted. A qualified historical archaeologist will complete an evaluation of historic period resources, while evaluation~~

~~of precontact resources will be completed by a qualified archaeologist specializing in California prehistoric archaeology.~~

~~Evaluations may include archival research, oral interviews, and/or field excavations to determine the full depth, extent, nature, and integrity of the deposit.~~

**Mitigation Measure CUL-2: Inadvertent Cultural Resource Discoveries**

If unanticipated cultural resources are identified during construction, the following procedures will be initiated:

- All ground-disturbing construction activities within 100 feet of the discovery will halt immediately.
- A qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find.
- The construction crew will protect the discovery from further disturbance until a qualified archaeologist has assessed it.
- The construction supervisor will immediately contact the project environmental inspector and the PG&E cultural resource specialist ~~immediately~~.

Work on the other portions of the project outside of the buffered area may continue during this assessment period. The PG&E cultural resources specialist will coordinate with the CPUC and NAHC, as appropriate. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. If the discovery can be avoided or protected and no further impacts will occur, then the resource will be documented on DPR 523 forms, and no further effort will be required. If the resource cannot be avoided and may be subjected to further impacts, qualified personnel will evaluate the significance of the discovery in accordance with the state laws outlined previously; personnel will implement data recovery or other appropriate treatment measures, if warranted. A qualified historical archaeologist will complete an evaluation of historic period resources, while evaluation of precontact resources will be completed by a qualified archaeologist specializing in California prehistoric archaeology.

Evaluations may include archival research, oral interviews, and/or field excavations to determine the full depth, extent, nature, and integrity of the deposit.

If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, a Cultural Resource Monitoring and Treatment Plan shall be prepared by the archaeologist in coordination with YSMN, and all subsequent finds shall be subject to the Cultural Resource Monitoring and Treatment Plan. The Plan shall allow for a monitor to be present that represents YSMN for the

remainder of the project ground disturbing activities, should YSMN elect to place a monitor on-site.

Table 2.6-9 Summary Table of Applicant Proposed Measures under Section 2.6.18, Applicant Proposed Measures beginning on page 2-23 is revised as follows:

**APM TCR-1: Undiscovered Potential Tribal Cultural Resources**

After stopping work and following the procedure for determining eligibility in Mitigation Measure ~~APM~~ CUL-2, if a prehistoric or protohistoric site is identified and cannot be avoided, PG&E will contact the CPUC and NAHC to identify an appropriate tribe with whom to consult on treatment.

If no agreement can be reached for mitigation after discussions with the California Native American Tribe(s), or after determining that a tribe's preferred mitigation is not feasible, PG&E will implement one of the example mitigation measures listed in Section 21084.3(b) of the PRC or other feasible mitigation.

## 3.4 Changes to Section 3.1, Aesthetics

The reference under 3.1.7, on page 3.1-9 is revised as follows:

County of San Bernardino. 2025. "Circulation Elements - Overview." https://sbcounty.maps.arcgis.com/apps/mapviewer/index.html?layers=35d78b44c06340e08d8c55c3b9120265

## 3.5 Changes to Section 3.3, Air Quality

Subsection 3.3.4, Environmental Impacts Question B on page 3.3-9 is revised as follows:

**a) Would the Project 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?**

Project construction is expected to start in October 2026, and to take approximately 23 months to complete. Project construction activities would generate criteria air pollutant emissions that would affect regional air quality. During construction, the primary pollutant emissions of concern would be criteria air pollutants and precursors from the exhaust of off-road construction equipment, temporary Portable Equipment Registration Program (PERP) natural gas generators, and on-road construction vehicles related to worker vehicles, vendor trucks, and haul trucks. In addition, fugitive dust emissions would result from ground-disturbing activities, such as ~~grading and~~ material hauling.

## 3.6 Changes to Section 3.4, Biological Resources

Revisions to subsection 3.4.1, Approach to Data Collection under the first paragraph on page 3.4-2 are as follows:

> A Biological Resources Technical Report (Jacobs 2025) was prepared for the Project to document federal and state database desktop analysis and biological field surveys documenting vegetation, botanical, and biological resources that may occur within or adjacent to ~~the area within~~ the Project area. Reconnaissance field surveys were conducted on April 12, 2024, prior to protocol-level surveys to assess habitat suitability for special status species known to occur within 5-miles of the Project area. Appendix B presents the Biological Resources Technical Report and its supporting documents.

Revisions to subsection 3.4.1, Approach to Data Collection under the header titled Study Areas on page 3.4-2 are as follows:

> **Study Areas**
>
> The study area for vegetation communities and land cover types for the Project encompasses the Project site plus a 1,000-foot radius (vegetation study area). The study area for flora includes a 100-foot radius from the Project (botanical study area). The study area for wildlife encompasses the area within the Hinkley Compressor Station fence line plus a 600-foot radius (biological study area, see Figure 3.4-1). The study areas are sufficient to evaluate both direct and indirect effects of the Project (e.g., noise, dust, etc.) based on the Project activities

Revisions to subsection 3.4.1, Approach to Data Collection under the header titled Vegetation Community Surveys on page 3.4-2 are as follows:

> **Vegetation Community Surveys**
>
> Vegetation communities for the project were assessed through desktop analysis and information on species documented during floristic surveys. Prior to field surveys, the California Department of Wildlife (CDFW) Veg CAMP database for the California Deserts and Biographic Information and Observation System as part of the California Natural Diversity Database (CNDDB) was reviewed to determine potential habitat in the biological study area. These data were refined during field surveys to better characterize ~~vegetation communities~~ and evaluate available habitat for special status plant and wildlife species (Jacobs 2025).

Revisions to subsection 3.4.1, Approach to Data Collection under the header titled Botanical Surveys on page 3.4-2 are as follows:

> **Botanical Surveys**

~~Meandering botanical transect~~ Protocol-level floristic surveys were conducted on April 15 and 16, 2024, to map any special status plant species present within or adjacent to the proposed work or staging areas. The objective of the surveys was to generate a comprehensive list of all plant species that occur in the botanical study area and to map, photograph, and record data for any special status plant species found. Prior to surveys, pre-survey research and literature review were conducted to determine special status plants that may occur within the botanical study area.

Revisions to Section 3.4.1, Approach to Data Collection under the header titled Wildlife Survey on page 3.4-2 are as follows:

**Wildlife Surveys**

Wildlife surveys conducted for the project included protocol-level ~~focused~~ surveys for Agassiz's desert tortoise, habitat and breeding season surveys for burrowing owl, and protocol-level surveys and trapping for Mohave ground squirrels. Observations of common plant and animal species were recorded concurrently with these surveys. ~~The study area for wildlife (biological study area encompasses the area within the Hinkley Compressor Station fence line plus a 600-foot radius.~~

Protocol-level ~~Focused~~focused presence-absence surveys for Agassiz's desert tortoise were conducted on ~~April~~ March 12 and 13, 2024. Focused surveys included transects spaced at 10-meter (approximately 33 feet) intervals in all areas with unpaved surfaces inside the Hinkley Compressor Station fence line. At the request of the CDFW, six zone-of-influence transects spaced 100 feet apart from Hinkley Compressor Station to the east, north, west, and south were surveyed where possible.

Burrowing owl surveys were initially conducted on April 12, 2024, to assess habitat. Breeding surveys were conducted during four events between May 15 and July 15, 2024. Breeding surveys included transects spaced at 30-meter (approximately 98 feet) intervals out to 180 meters (approximately 591 feet) on PG&E and private properties outside of the Hinkley Compressor Station fence line. Permission was not granted on one private property within the biological study area and therefore was not included in surveys. ~~Burrowing owl transects were also surveyed for evidence of desert tortoise.~~

The first paragraph under 3.4.2, Environmental Setting (Vegetation Communities and Land Cover Types) on page 3.4-5 is revised as follows:

**Vegetation Communities and Land Cover Types**

The landscape within vegetation study area consists of a mix of agricultural areas, developed ~~residential~~ industrial areas, and ~~small private property holdings~~ rural residential areas. The ~~surrounding area~~ area surrounding the station primarily consists of hardscaped or developed/landscaped agricultural land and ruderal or non-native species with some undeveloped desert scrub (Jacobs 2025; PG&E 2025). Much of the

Project site has been developed and is unvegetated due to the existing Hinkley Compressor Station facilities. Vegetation in the Project site primarily consists of ornamental landscape plantings, trees, and shrubs. There is a 2-acre area of native vegetation along the western fence line within the Project site, outside of the proposed work area (PG&E 2025). Table 3.4-1provides a summary of vegetation communities and land cover types within the vegetation study area. Representative vegetation alliances from the *Manual of California Vegetation* second edition (Sawyer et al. 2009) are referenced and described below.

The first paragraph under subsection 3.4.2, Environmental Setting (Special Status Species) on page 3.4-7 is revised as follows:

**Special Status Species**

The initial desktop review of CNDDB, California National Plant Society (CNPS), National Oceanic and Atmospheric Administration (NOAA) Fisheries, and US Fish and Wildlife Service (USFWS) databases identified 22 special-status plant species and 22 special status wildlife species with potential to occur within approximately 5 miles of the Project site (Jacobs 2025). Habitat requirements for each special status species were evaluated to determine whether they may occur within the botanical and biological study areas and are summarized in Table 3.4-2. Species with the possibility of occurring in the ~~Project area~~ biological survey area and the botanical survey area are discussed below.

Table 3.4-2 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical Study Area under 3.4.2, Environmental Setting beginning on page 3.4-7 is revised as follows:

**Table 3.6-1 Special Status Plant and Wildlife Species with Potential to Occur within the Botanical and Biological Study Areas**

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| **Plants** | | | |
| Chaparral sand verbena<br>*Abronia villosa* var. *aurita* | Federal: None<br>State: None<br>CRPR: 1B.1<br>BLM: S | Annual herb. Coastal scrub and mostly broad alluvial fans and benches. Sandy soils. Elevations from 260 to 5,250 feet. Blooms January to August. | **Absent.** No suitable habitat within the biological survey area or botanical survey areas due to lack of coastal plains or low desert areas. One likely misidentified CNDDB occurrence recorded within 5 miles of the ~~biological~~ botanical study area. None were |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | | encountered during field surveys. |
| Lane Mountain milk-vetch<br>*Astragalus jaegerianus* | Federal: Endangered<br>State: None<br>CRPR: 1B.1<br>BLM: None | Perennial herb. Joshua tree woodland and Mojave Desert scrub. Shallow sandy soils within areas of exposed or partially exposed granitic bedrock. Elevations from 2,952 to 3,936 feet. Blooms April to June. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles ~~of the biological or~~ botanical study area~~s~~. None encountered during field surveys. |
| Desert cymopterus<br>*Cymopterus deserticola* | Federal: None<br>State: None<br>CRPR: 1B.2<br>BLM: S | Perennial herb. Joshua tree woodland and Mojave Desert scrub with sandy substrates. Elevations from 2,066 to 4,920 feet. Blooms March to May. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the ~~biological or~~ botanical study area~~s~~. None encountered during field surveys. |
| Mojave monkeyflower<br>*Diplacus mohavensis* | Federal: None<br>State: None<br>CRPR: 1B.2<br>BLM: S | Annual herb. Joshua tree woodland, Mojave Desert scrub and sandy or gravelly places such as washes. Elevations from 1,968 to 3,936 feet. Blooms April to June. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. One CNDDB occurrence recorded within 5 miles of the botanical study area reported in 1941. None encountered during field surveys. |
| Barstow woolly sunflower<br>*Eriophyllum mohavense* | Federal: None<br>State: None<br>CRPR: 1B.2<br>BLM: S | Annual herb. Saltbush scrub, Mojave Desert scrub and playas. Elevations from 1,650 to 3,148 feet. Blooms March to May. | **Unlikely.** Suitable habitat is present within the botanical study area west of Fairview Road, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area; however, there are several CNDDB |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | | occurrences recorded within 6 miles of the botanical study area. None encountered during field surveys. |
| Mojave menodora<br>*Menodora spinescens* var. *mohavensis* | Federal: None<br>State: None<br>CRPR: 1B.2<br>BLM: S | Perennial deciduous shrub. Mojave Desert scrub, and in areas with Andesite gravel on rocky hillsides and in canyons. Elevations from 2,263 to 6,560 feet. Blooms April to May. | **Unlikely.** Suitable habitat is present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None encountered during field surveys. |
| Spiny-hair blazing star<br>*Mentzelia tricuspis* | Federal: None<br>State: None<br>CRPR: 2B.1<br>BLM: None | Annual herb. Sandy and or gravelly Mojave Desert scrub and desert washes. Elevations from 490 to 4,200 feet. Blooms March to May. | **Unlikely.** Minimal marginal to low quality suitable habitat is present in the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the ~~biological or~~ botanical study area~~s~~. None encountered during field surveys. |
| Creamy blazing star<br>*Mentzelia tridentata* | Federal: None<br>State: None<br>CRPR: 1B.3<br>BLM: None | Annual herb. Mojave Desert scrub in association with gravelly, rocky or sandy substrates. Elevations from 2,296 to 3,805 feet. Blooms March to May. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of ~~the biological or~~ botanical study area~~s~~. None encountered during field surveys. |
| Beaver dam breadroot<br>*Pediomelum castoreum* | Federal: None<br>State: None<br>CRPR: 1B.2<br>BLM: S | Perennial herb. Joshua tree woodland and Mojave Desert scrub within sandy washes and road cuts. Elevations from 2,000 to 5,002 feet. Blooms April to May. | **Unlikely.** Suitable habitat is present in the botanical study area outside of the proposed work area. Two CNDDB occurrences within 5 miles of the ~~biological~~ botanical study area recorded prior to |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | | 1937. None encountered during field surveys. |
| Parish's phacelia<br>*Phacelia parishii* | Federal: None<br>State: None<br>CRPR: 1B.1<br>BLM: S | Annual herb. Mojave Desert scrub and clay or alkaline playas. Elevations from 1,771 to 3,936 feet. Blooms April to May. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the ~~biological or~~ botanical study area~~s~~. None encountered during field surveys. |
| California alkali grass<br>*Puccinellia simplex* | Federal: None<br>State: None<br>CRPR: 1B.2<br>BLM: S | Chenopod scrub, meadows and seeps, Valley and foothill grassland, vernal pools. Elevations from 5 to 3050 feet. Blooms March to May. | ~~**Unlikely**~~ **Absent**. No suitable habitat is present in the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the ~~biological or~~ botanical study area~~s~~. None encountered during field surveys. |
| Western Joshua tree<br>*Yucca brevifolia* | Federal: None<br>State: SC<br>CRPR: None<br>BLM: None | Perennial tree. Native to the southwestern United States (Arizona, California, Nevada, and Utah) and northwestern Mexico, confined mostly to the Mojave Desert between 1,300 and 5,900 ft elevation. Blooms March to June. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |
| Colorado Desert larkspur<br>*Delphinium parishii* ssp. *subglobosum* | Federal: None<br>State: None<br>CRPR: 4.3 | Chaparral, cismontane woodland, pinyon and juniper woodland, Sonoran Desert scrub. Blooms March to June. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| Crowned muilla<br>*Muilla coronata* | Federal: None<br>State: None<br>CRPR: 4.2 | Chenopod scrub, Joshua tree "woodland", Mojavean desert scrub, pinyon and juniper woodland. Blooms March to April. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |
| Joshua Tree poppy<br>*Eschscholzia androuxii* | Federal: None<br>State: None<br>CRPR: 4.3 | Washes in Joshua tree "woodland" and Mojavean desert scrub. Blooms February to May. | ~~**Unlikely.**~~ **Absent.** Suitable habitat is not present within the botanical study area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |
| White pygmy-poppy<br>*Canbya candida* | Federal: None<br>State: None<br>CRPR: 4.2 | Joshua tree "woodland", Mojavean desert scrub, pinyon and juniper woodland. Sandy/granitic/gravelly soils. Blooms March to June. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |
| Mojave spineflower<br>*Chorizanthe spinosa* | Federal: None<br>State: None<br>CRPR: 4.2 | Chenopod scrub, Joshua tree "woodland", Mojavean desert scrub, playas. Often alkaline soils. Blooms March to July. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |
| Slender cottonheads<br>*Nemacaulis denudata* var. *gracilis* | Federal: None<br>State: None<br>CRPR: 2B.2 | Creosote bush scrub; sandy soils on stabilized dunes and sand ramps. Blooms March to May. | **Absent.** No suitable habitat is present within the botanical study area due to the lack of stabilized dunes or ramps. No CNDDB occurrences |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | | recorded within 5 miles of the botanical study area. None encountered during field surveys. |
| Mojave fishhook cactus *Sclerocactus poluyancistrus* | Federal: None<br>State: None<br>CRPR: 4.3 | Great Basin scrub, Joshua tree "woodland"; Mojavean desert scrub, usually carbonate soils. Blooms April to July. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |
| Mojave indigo-bush *Psorothamnus arborescens* var. *arborescens* | Federal: None<br>State: None<br>CRPR: 4.3 | Mojavean desert scrub, riparian scrub. Blooms April to May. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |
| Mojave menodora *Menodora spinescens* var. *mohavensis* | Federal: None<br>State: None<br>CRPR: 1B.2 | Mojavean desert scrub. Slopes, canyons, gravelly, rocky soils. Andesite gravel. Blooms April to May. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |
| Torrey's box-thorn *Lycium torreyi* | Federal: None<br>State: None<br>CRPR: 4.2 | Sandy, rocky, washes, streambanks, desert valleys in Mojavean and Sonoran Desert scrub. January to November. | **Unlikely.** Suitable habitat is present within the botanical study area, outside of the proposed work area. No CNDDB occurrences recorded within 5 miles of the botanical study area. None encountered during field surveys. |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| **Invertebrates** | | | |
| Monarch butterfly<br>*Danaus plexippus* | Federal: Proposed T<br>State: None<br>CDFW: None<br>BLM: None | In spring and summer, habitats are open fields and meadows with milkweed. In winter, found on the coast of southern California and at high altitudes in central Mexico. Whether it is a field, roadside area, open areas, wet area, or urban garden, milkweed and flowering plants are needed for monarch habitat. Adult monarchs feed on the nectar of many flowers, but they breed only where milkweeds are found. | **Unlikely.** The biological study area is within range of the monarch butterfly. No CNDDB occurrences recorded within 5 miles of the biological study area. One milkweed species, climbing milkweed (*Funastrum cynanchoides* var. *hartwegii*), was observed in the biological study area. Monarch butterflies could migrate through the ~~botanical~~ biological study area but are unlikely to remain for foraging and breeding. None ~~individuals were not~~ observed ~~in the biological study area~~ during field surveys. |
| **Amphibians** | | | |
| Arroyo toad *Anaxyrus californicus* | Federal: E<br>State: None<br>CDFW: SSC<br>BLM: None | Headwaters of large streams with persistent water from March to mid-June. Shallow, gravely pools less than 18 inches deep adjacent to sandy terraces. | **Absent.** No suitable habitat is present in the biological study area; the man-made evaporation ponds in the project site do not support viable habitat. Although the Mojave River could provide suitable habitat, no CNDDB occurrences recorded within 5 miles of the biological or botanical study areas. None ~~were identified~~ observed ~~in the biological study area~~ during field surveys. |
| **Reptiles** | | | |
| Southwestern pond turtle<br>*Actinemys pallida* | Federal: PT<br>State: None<br>CDFW: SSC<br>BLM: S | Ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches, with abundant vegetation, and either rocky or muddy | **Absent.** No suitable habitat is present within the biological study area. While the agricultural fields may provide |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | bottoms, in woodland, forest, and grassland. In streams, pond turtle prefer pools to shallower areas. Logs, rocks, cattail mats, and exposed banks are required for basking. May enter brackish water and even seawater. | marginally suitable upland habitat, there are no irrigation canals present within biological study area. Man-made evaporation ponds within the Project site do not support viable habitat. No CNDDB occurrences reported within 5-miles of the biological study area. None observed ~~were identified in the biological study area~~ during field surveys. |
| Desert tortoise<br>*Gopherus agassizii* | Federal: T<br>State: T<br>CDFW: T<br>BLM: None | Mojave and Sonoran deserts in southwestern Utah, southern Nevada, southeastern California, and western Arizona in the United States. Habitat includes creosote/ cactus/shadscale scrub from sandy flats to rocky foothills, including alluvial fans, washes, and canyons where suitable soils for den construction might be found. Found from near sea level to around 3,500 feet in elevation. | ~~**Unlikely**~~ **Possible**. Undeveloped portions of the biological study area may provide low-quality suitable habitat. Eight CNDDB occurrences ~~were~~ recorded within 5 miles of the biological study area. The proposed work area is developed/disturbed. ~~Project site is fenced and~~ Fencing likely precludes desert tortoise from entering the site. None observed ~~were identified in the biological study area~~ during field surveys. |
| Mojave fringe-toed lizard<br>*Uma scoparia* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: S | Restricted to areas with fine, loose, windblown areas including dunes, dry lakebeds, desert washes, riverbanks, sparse desert scrub habitats, and isolated pockets against hillsides. | **Absent.** No suitable habitat in the biological study area due to lack of aeolian sand deposits. Suitable habitat is present in the Mojave River, approximately 1.3 miles southeast of the biological study area. Two reported CNDDB occurrences recorded within 5 miles of the biological study area. None ~~were identified in~~ |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | | ~~the biological study area~~ observed during field surveys. |
| **Fish** | | | |
| Mohave tui chub *Siphateles bicolor mohavensis* | Federal: E<br>State: E<br>CDFW: FP<br>BLM: None | Endemic to the Mojave River basin. Prefers lake habitats, always associated with deep pools and slough-like areas, and do poorly in fast-flowing streams. Adapted for harsh water qualities including alkaline waters and extreme temperatures. | **Absent.** No suitable aquatic habitat is present within the biological study area. The CNDDB indicates the species have been extirpated from the area since 1992. None ~~were identified in the biological study area~~ observed during field surveys. |
| **Birds** | | | |
| Golden eagle *Aquila chrysaetos* | Federal: None<br>State: None<br>CDFW: FP<br>BLM: S | Golden eagle can be found from the tundra, through grasslands, intermittent forested habitat and woodland-brushlands, and south to arid deserts and canyonlands. Typically found in open country in the vicinity of hills, cliffs and bluffs. Known to be sensitive to human activity and are known to avoid developed areas. | **Unlikely.** Marginal to low quality foraging habitat is present in the undeveloped scrub of the outer portions of the biological study area. No suitable nesting habitat is present in the biological study area. May migrate through the biological study area but unlikely to remain for foraging or breeding. None observed ~~in the biological study area~~ during field surveys. |
| Burrowing owl *Athene cunicularia* | Federal: None<br>State: SC<br>CDFW: SSC<br>BLM: S | Inhabits open, dry, nearly or quite level, grassland; prairie; desert floor; shrubland should be considered potential habitat if shrub cover is below 30 percent. In coastal Southern California, some are found in microhabitats highly altered by humans, including flood control and irrigation basins, dikes, and banks, abandoned fields surrounded by agriculture, | **Possible.** Suitable breeding habitat may occur in the biological study area where ground squirrel burrows are found, outside of the proposed work area. Suitable foraging habitat is available in agricultural areas. Six CNDDB occurrences-reported within 5 miles of the biological study area. No burrows or burrowing |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | and road cuts and margins. In the western United States burrowing owls are only rarely known to construct their own burrows; there is a strong association between burrowing owls and burrowing mammals, especially ground squirrels (Spermophilus spp.); however burrowing owls will also occupy human-made niches such as banks and ditches, piles of broken concrete, and even abandoned structures. | owls encountered during field surveys. |
| Mountain plover *Charadrius montanus* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: S | Nest in shortgrass prairie, especially where blue grama, buffalo grass, and western wheat grass are dominant; and in grassy semidesert with scattered saltbush, sage, prickly pear, and yucca, at elevations ranging from 2,100 to 10,663 feet. They also nest in fallow or recently plowed agricultural fields and in overgrazed landscapes that mimic their natural shortgrass habitat. Mountain Plover often nests around prairie-dog towns. During migration they may appear in almost any shortgrass habitat, including sod farms, playas, or tilled fields. | **Absent**. No suitable habitat is present within the biological study area; the lined man-made evaporation ponds in the Hinkley Compressor Station fence line do not support viable habitat. No CNDDB occurrences recorded within 5 miles of the biological study area. Individuals may migrate through the area but are unlikely to remain for foraging or breeding. None encountered during field surveys. |
| Western snowy plover *Charadrius nivosus nivosus* | Federal: T<br>State: None<br>CDFW: SSC<br>BLM: None | Found on sandy beaches, salt pond levees, and shores of large alkali lakes. Needs sandy, gravelly, or friable soils for nesting. Breeds primarily on coastal beaches above the high tide line on coastal | **Absent**. No suitable habitat is present within the biological study area; the lined man-made evaporation ponds in the Hinkley Compressor Station fence line do not support viable habitat. No |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | beaches, sand spits, dune-backed beaches, sparsely-vegetated dunes, beaches at creek and river mouths, and salt pans at lagoons and estuaries. Wintering snowy plovers are found on many of the beaches used for nesting as well as in human-made salt ponds, and on estuarine sand and mudflats. | CNDDB occurrences recorded within 5 miles of the biological study area. Individuals may migrate through the area but are unlikely to remain for foraging or breeding. None encountered during field surveys. |
| Western, yellow-billed cuckoo<br>*Coccyzus americanus occidentalis* | Federal: T<br>State: E<br>CDFW: None<br>BLM: S | Inhabitant of extensive, mature, riparian forests; has declined from a fairly common, local breeder in much of California 60 years ago, to virtual extirpation with only a handful of tiny populations remaining in all of California today. Losses are tied to obvious loss of nearly all suitable habitat, but other factors may also be involved. Relatively broad, well- shaded riparian forests are utilized, although it tolerates some disturbance. A specialist to some degree on tent caterpillars, with remarkably fast development of young covering only 18–21 days from incubation to fledging. | **Absent**. No suitable habitat is present within the biological study area; the man-made evaporation ponds in the project site do not support viable habitat. No CNDDB occurrences recorded within 5 miles of the biological study area. May migrate through the biological study area but it is unlikely to remain for foraging or breeding. None encountered during field surveys. |
| Loggerhead shrike<br>*Lanius ludovicianus* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: None | Forages in open country of many types (including non-intensive agricultural areas) and nests in small trees and large shrubs, often at the edges of such open areas. Like most birds of prey, generally occurs at low densities. The species is widely distributed in Southern California with | **Possible.** Marginal, low quality foraging habitat is present within the creosote bush scrub/allscale scrub habitat in the biological study area. No CNDDB nests recorded within 5 miles of the biological study area. May migrate through the biological study area but it is |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | some seasonal movements evident. | unlikely to remain for foraging or breeding. None encountered during field surveys. |
| Yuma Ridgway's rail *Rallus obsoletus yumanensis* | Federal: E<br>State: T<br>CDFW: FP<br>BLM: None | Found in freshwater and alkali marshes dominated by stands of emergent vegetation interspersed with areas of open water and drier, upland benches. Prefers mature marsh stands along margins of shallow ponds with stable water levels. Nest sites selected by near upland areas in shallow sites dominated by mature vegetation, often in the base of a shrub. | **Absent**. No suitable habitat is present within the biological study area; the man-made evaporation ponds in the project site do not support viable habitat. No CNDDB occurrences recorded within 5 miles of the biological study area. May migrate through the biological study area but it is unlikely to remain for foraging or breeding. None encountered during field surveys. |
| Le Conte's thrasher *Toxostoma lecontei* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: S | Found in low, sandy, open deserts that are home to few other bird species. Over most of their range, saltbush, shadscale, cholla cactus, creosote, yucca, mesquite, and ocotillo are common plants, but they are usually sparsely distributed in these mostly flat or rolling landscapes. Generally do not inhabit steep-sided canyons, preferring small arroyos, open flats, or dunes. | **Possible.** Marginal, low quality foraging habitat is present within the creosote bush scrub/allscale scrub habitat in the biological study area. No CNDDB occurrences recorded within 5 miles of the biological study area. May migrate through the biological study area but it is unlikely to remain for foraging or breeding. None encountered during field surveys. |
| Mohave river vole *Microtus californicus mohavensis* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: None | Occurs in moist habitats including meadows, freshwater marshes, and irrigated pastures in the vicinity of the Mojave River. Suitable habitat is associated with ponds and irrigation canals along with the Mojave River. Burrows into soft soils. Elevations of | **Absent.** No suitable habitat is present within the biological study area. Adjacent agricultural fields could provide marginally suitable habitat; however, there are no irrigation canals present within the biological study area. The |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | known localities range between 2,325–2,700 feet. | man-made evaporation ponds in the project site do not support viable habitat. No CNDDB occurrences recorded within 5 miles of the biological study area. May migrate through the biological study area but it is unlikely to remain for foraging or breeding. None encountered during field surveys. |
| American badger<br>*Taxidea taxus* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: None | Found in open, drier stages of many shrub, herbaceous, and woodland communities where soils are dry and suitable for burrowing. Sensitive to fragmentation of open spaces. Generally, it requires good diversity and abundance of rodent prey. | **Absent.** No suitable habitat is present within the biological study area due to developed/disturbed and fragmented habitat. The Project site is surrounded by a chain link fence. One CNDDB occurrence reported within 5 miles of the biological study area. None encountered during field surveys. |
| Mohave ground squirrel<br>*Xerospermophilus mohavensis* | Federal: None<br>State: T<br>CDFW: None<br>BLM: S | Restricted to the Mojave Desert in San Bernardino, Los Angeles, Kern, and Inyo Counties. Optimal habitats are open desert scrub, alkali desert scrub, and Joshua tree woodland. Feeds in annual grasslands. Prefers sandy to gravelly soils, avoids rocky areas. Uses burrows at base of shrubs for cover. | **Possible.** Potential suitable habitat is present within the biological study area. Three CNDDB occurrences reported within 5 miles of the biological study area. None encountered during field surveys. |
| Pallid Bat<br>*Antrozous pallidus* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: S | Roosts in caves, crevices, mines, and occasionally hollow trees and buildings in a wide variety of habitats, including grasslands, shrublands, woodlands, and forests from sea level up | **Absent.** Suitable roosting habitat may occur within the biological study area in buildings. None encountered during field surveys and no evidence |

| Common/Scientific Name | Status | Habitat | Potential for Occurrence in Study Area |
|---|---|---|---|
| | | through mixed conifer forest. Most common in open, dry habitats with rocky areas for roosting. | of use was found within the biological study area. |
| Townsend's big-eared bat *Corynorhinus townsendii* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: S | Roosts in caves, tunnels, mines, & buildings in all habitats found in California except subalpine and alpine. | **Absent.** Suitable roosting habitat may occur within the biological study area in buildings. None encountered during field surveys and no evidence of use was found within the biological study area. |
| Spotted bat *Euderma maculatum* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: S | Roosts mostly in rock crevices, also occasionally in caves and buildings in arid deserts, grasslands and mixed conifer forests at elevations up to and sometimes higher than10,000 feet. | **Absent.** Suitable roosting habitat may occur within the biological study area in buildings. None encountered during field surveys and no evidence of use was found within the biological study area. |
| Western mastiff bat *Eumops perotis californicus* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: S | Roosts in crevices in cliff faces, high buildings, trees, and tunnels in open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, annual and perennial grasslands, palm oases, chaparral, desert scrub, and urban areas. | **Absent.** Suitable roosting habitat may occur within the biological study area in buildings. None encountered during field surveys and no evidence of use was found within the biological study area. |
| Silver-haired bat *Lasionycteris noctivagans* | Federal: None<br>State: None<br>CDFW: SSC<br>BLM: S | Roosts in hollow trees, snags, buildings, rock crevices, caves, and under exfoliating bark. Maternity roosts are typically in dense foliage or hollow trees. Habitat types include coastal and montane coniferous forests, valley foothill woodlands, pinyon-juniper woodlands, and valley foothill and montane riparian habitats, generally below 9,000 feet. | **Absent.** Suitable roosting habitat may occur within the biological study area in buildings. None encountered during field surveys and no evidence of use was found within the biological study area. |

Revisions to Section 3.4.2, Environmental Setting under the header titled Special Status Plant Species on page 3.4-20 are as follows:

**Special Status Plant Species**

No special status plant species, including federal Endangered Species Act (ESA), California Endangered Species Act (CESA), BLM special status, CRPR, or CDFW Species of Special Concern were encountered during field surveys, which were conducted during the typical blooming period for the 22 special status plant species targeted during surveys (see Table 3.4-2). While some habitat for special status plant species may occur within the biological study area habitat quality is generally low due to existing development, agricultural uses, and fragmentation of native vegetation communities. The Project area is mostly developed and disturbed (Jacobs 2025). ~~The~~ Several reference populations ~~locations of the CNDDB recorded occurrences~~ of Barstow woolly sunflower, desert cymopteris, and beaver dam breadroot were visited ~~also surveyed~~ as reference sites; ~~but~~ none of these species were ~~encountered~~ observed (Jacobs 2025). Based on the lack of evidence of occurrences, special status plants are not considered further.

Table 3.4-4 APMs Relevant to Biological Resources under 3.4.4, Applicant Proposed Measures beginning on page 3.4-27 is revised as follows:

**APM BIO-1: Protect Nesting Birds**

~~For any~~ If construction is to occur ~~scheduled~~ during the ~~typical migratory bird or raptor~~ avian nesting season (March 1 through August 15), a preconstruction migratory bird and raptor nesting surveys ~~would~~ will be performed by a qualified biologist who is familiar with local avian species and nesting birds. Surveys ~~would~~ will occur only in publicly accessible areas and~~/or~~ where PG&E has existing access.~~; Private~~ private property ~~would~~ will not be ~~used for access~~ accessed and will instead be observed from adjacent accessible areas. ~~If active nests containing eggs or young are found, an appropriate nest exclusion zone would be established to prevent disturbance to the nest.~~

~~Migratory bird and raptor nesting preconstruction~~ Preconstruction nesting bird surveys ~~and avoidance measures would~~ will be performed in accordance with PG&E's Nesting Bird Management Plan. The preconstruction survey will cover a radius of 200 feet for nonlisted raptors and 100 feet for nonlisted passerines from project locations that will be actively worked at in the near term. The survey will cover all affected areas where ground disturbance is required. If any active nests containing eggs or young are found, an appropriate nest exclusion zone will be established by the PG&E biologist in accordance with PG&E's Nesting Bird Management Plan. No heavy equipment will be operated in this exclusion zone until the biologist has determined that the nest is no longer active, and the young have fledged. If it is not practicable to avoid work in an exclusion zone around an active nest, work activities will be modified to minimize disturbance of nesting birds but may proceed in these zones at the discretion of the biologist. As appropriate, the biologist will monitor work activities in these zones daily

or periodically when construction is occurring and assess their effect on the nesting birds. If the biologist determines that particular activities pose a high risk of disturbing an active nest, the biologist will recommend additional, feasible measures to minimize the risk of nest disturbance. If work cannot proceed without disturbing the nesting birds, or signs of disturbance are observed by the monitor, work may need to be halted or redirected to other areas until the nesting and fledging is completed or the nest has otherwise failed for reasons not related to construction.

**APM BIO-2: Protect wildlife trapped in trenches or steep-walled holes**

~~All excavated holes/trenches that are not filled at the end of a workday would be covered, or a wildlife escape ramp would be installed to prevent the inadvertent entrapment of wildlife species. Excavated holes/trenches left overnight would be inspected prior to the onset of work. If wildlife is found, work would pause until the PG&E biologist is able to remove and relocate the animal.~~

Field crews will fit open trenches or steep-walled holes with escape ramps of plywood boards or sloped earthen ramps at each end if left open overnight. Field crews will search open trenches or steep-walled holes every morning prior to initiating daily activities to ensure wildlife is not trapped. If any wildlife is found, work will stop, and the PG&E biologist will be contacted to move the animal out of harm's way.

**APM BIO-3: Preconstruction Surveys**

Preconstruction biological clearance surveys ~~would~~ will be completed by a qualified biologist prior to ~~the onset of~~ construction activities beginning and will occur throughout the project site to minimize impacts on wildlife.

**APM BIO-4. Worker Environmental Awareness Program – Biological Resources Portion**

A ~~Worker Environmental Awareness Program~~ worker environmental awareness program (WEAP) ~~would~~ will be prepared for the project ~~and implemented to educate construction and O&M workers on site-specific biological and non-biological resources and proper work practices to avoid harming wildlife during construction or O&M~~ to communicate environmental issues and appropriate work practices specific to the project to all construction field personnel before they begin work on the project. A PG&E biologist or designee familiar with resources in the area will deliver the WEAP biological resources portion. Training will include a discussion of the potential for nesting birds and possible buffers, along with the requirement to protect wildlife from becoming trapped in trenches or steep-walled holes. Training will include information about federal laws protecting nesting birds. ~~The WEAP would include training which addresses the requirements for protecting wildlife from entrapment in open trenches or steep-walled holes and nesting birds.~~ A copy of the training sign-in sheets documenting participation in the training will ~~would~~ be provided to the CPUC.

The first paragraph in subsection 3.4.5, Environmental Impact Question A on page 3.4-32 regarding Indirect Construction Impacts is revised as follows:

**Indirect Construction Impacts**

Construction activities such as ~~grading and~~ driving heavy equipment on unpaved roadways can result in increased levels of fugitive dust that may settle on surrounding plants, which can adversely affect photosynthesis. Spills from hazardous materials may harm or kill affected plants. Introduction and/or spread of invasive species could further reduce habitat quality for many native plant and wildlife species. Implementation of APM AIR-1 defines best management practices to reduce fugitive dust. APM HAZ-1 and HAZ-2 require implementation of hazardous material and emergency response procedures and emergency spill supplies and equipment to be stored on site to reduce impacts from spills. While the APMs would reduce indirect impacts on special-status species, construction equipment could introduce invasive or noxious weeds resulting in a significant impact on special-status species habitat. Mitigation Measure BIO-4 requires vehicles and equipment to be cleaned prior to entering the project area. With the implementation of Mitigation Measures BIO-4, impacts would be less than significant.

Mitigation measures BIO-1 and BIO-2 are revised on pages 3.4-32 and 3.4-33 as follows:

**Mitigation Measure BIO-1: Desert Tortoise and Mohave Ground Squirrel**

Preconstruction clearance surveys for any burrows potentially containing desert tortoise or Mohave ground squirrel burrows shall be completed by a qualified biologist within 500 feet ~~meters (approximately 1,600 feet)~~ of the project footprint prior to the onset of construction activities. If the burrow has any sign of recent use by a desert tortoise or Mohave ground squirrel, the burrow shall be monitored by a qualified biologist for signs of activity. No construction activity shall be allowed within 200 feet ~~meters (approximately 656 feet)~~ of a burrow containing desert tortoise or Mohave ground squirrel without obtaining approval from CDFW. All project activities within 500 feet ~~meters (approximately 1,600 feet)~~ of an occupied desert tortoise or Mohave ground squirrel burrow shall be monitored by a qualified biologist to ensure avoidance of the species.

**Mitigation Measure BIO-2: Desert Kit Fox**

If an active, non-natal den is detected within the project footprint, then a 100-foot ~~50 meters (approximately 165 feet)~~ construction exclusion zone will be established, and passive relocation techniques may be used as determined by the qualified biologist. The buffer area will be maintained until passive relocation is successfully completed. If an active natal den is detected within the project footprint a 500-foot ~~200 meters (approximately 656 feet)~~ construction exclusion zone will be established, and passive relocation will not be implemented until monitoring confirms that the den is no longer in active use as a natal den.

Subsection 3.4.2, Environmental Impacts under Impact Question F on page 3.4-35 is revised as follows:

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

The Project is located within the boundaries of the PG&E *Hinkley Groundwater Remediation Project HCP*. The Project would be implemented within the developed Hinkley Compressor Station site and would not conflict with habitat preservation or other requirements in the *Hinkley Groundwater Remediation Project HCP*. The Project would not ~~No~~ conflict with any habitat conservation plan ~~is anticipated~~.

## 3.7 Changes to Section 3.5, Cultural Resources

Table 3.5-1 APMs Relevant to Cultural Resources under section 3.5.3 Applicant Proposed Measures beginning on page 3.5-16 is revised as follows:

**APM CUL-1: Worker Environmental Awareness Training Program, Cultural Resources Portion**

A worker environmental awareness training program (WEAP) will be prepared to communicate environmental issues and appropriate work practices specific to the Project to all construction field personnel before they begin work on the Project performing excavation or trenching activities. This training will be administered by a qualified cultural resource professional, either as a standalone training or as part of the overall environmental awareness training ~~that will be~~ required ~~for~~ by the Project~~. This training~~ and may be recorded for use in subsequent training sessions. The WEAP program will be provided separately to CPUC staff ~~before the start of~~ prior to construction. The WEAP will address, among other topics, ~~the following topics~~ at a ~~mimimum~~ minimum:

- A review of archaeology, history, precontact, and Native American cultures associated with historical resources ~~in the Project vicinity~~ near the project
- A review of applicable local, State, and federal ordinances, laws, and regulations pertaining to historic preservation
- A discussion of procedures to be followed if unanticipated cultural resources are discovered during ~~Project~~ implementation of the project
- A discussion of disciplinary ~~action~~ and other actions that can be taken against persons violating historic preservation laws and PG&E policies
- A statement by the construction company or applicable employer, agreeing to abide by the WEAP, PG&E policies, and other applicable laws and regulations.

**APM CUL-2: Inadvertent Cultural Resource Discoveries (Superseded by Mitigation Measure CUL-2)**

Subsection 3.5.4, Environmental Impacts under Impact Question A on page 3.5.17 is revised as follows:

**a) Would the Project result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5(a)?**

Section 15064.5 of the CEQA Guidelines requires the lead agency to consider the effects of a project on historical resources. A *historical resource* is defined as any building, structure, site, or object listed in or determined to be eligible for listing in the CRHR or determined by a lead agency to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, or cultural annals of California. No historical resources are known to occur within the Project APE/API. Although no known resources exist, the Project would include excavating or trenching for the MCC foundations and electrical conduit up to 5 feet deep and therefore would have the potential to encounter buried historical resources that could be eligible for listing in the CRHR. PG&E ~~would~~ proposed to implement APM CUL-1 and APM CUL-2. APM CUL-1 would require a WEAP to train workers on historic preservation regulations, procedures to follow if unanticipated cultural resources are discovered, and disciplinary actions if procedures are not followed. APM CUL-2 would require workers to follow detailed procedures if inadvertent discoveries are identified during construction. While the APMs would reduce impacts on cultural resources, the project could destroy a historical resource if one were to occur in the area of trenching or foundation excavation as the workers engaged in construction are not focused on identification of cultural resources and the impact would be significant as APM CUL-2 does not define procedures for a historic properties treatment plan in the event the resource cannot be avoided. Mitigation Measure CUL ~~Cultural~~ -1 requires archaeological and tribal monitoring during trenching and excavation activities to ensure that a historical resource would be identified ~~and avoided~~ if one occurred in the work area. Mitigation Measure CUL-2 supersedes APM CUL-2 and requires a Historic Properties Treatment Plan to address impacts on any resources that cannot be avoided. The resulting impact on the significance of a historical resource would be less than significant with mitigation.

**Mitigation Measures**

***Mitigation Measure CUL ~~Cultural~~ - 1: Archaeological Monitoring***

During trenching and excavation activities, in soil or sediment that is not imported or not previously disturbed, a tribal monitor from one tribe to be identified by the lead agency, shall be invited to be retained by PG&E to inspect for potential archaeological deposits or Tribal cultural resources. In the event of the discovery of archaeological

deposits or Tribal cultural resources, a tribal representative shall have the authority to halt work within 100 feet of the discovery, and CPUC shall be notified within 48 hours of the discovery. All procedures in Mitigation Measure ~~APM~~ CUL-2 shall be implemented during investigation of the resource.

**Mitigation Measure CUL-2: Inadvertent Cultural Resource Discoveries**

If unanticipated cultural resources are identified during construction, the following procedures will be initiated:

- All ground-disturbing construction activities within 100 feet of the discovery will halt immediately.
- A qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find.
- The construction crew will protect the discovery from further disturbance until a qualified archaeologist has assessed it.
- The construction supervisor will immediately contact the project environmental inspector and the PG&E cultural resource specialist.

Work on the other portions of the project outside of the buffered area may continue during this assessment period. The PG&E cultural resources specialist will coordinate with the CPUC and NAHC, as appropriate. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Tribal input will be provided within 10 days. If the discovery can be avoided or protected and no further impacts will occur, then the resource will be documented on DPR 523 forms, and no further effort will be required. If the resource cannot be avoided and may be subjected to further impacts, qualified personnel will evaluate the significance of the discovery in accordance with the state laws outlined previously; personnel will implement data recovery or other appropriate treatment measures, if warranted. A qualified historical archaeologist will complete an evaluation of historic period resources, while evaluation of precontact resources will be completed by a qualified archaeologist specializing in California prehistoric archaeology.

Evaluations may include archival research, oral interviews, and/or field excavations to determine the full depth, extent, nature, and integrity of the deposit.

If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, a Cultural Resource Monitoring and Treatment Plan shall be prepared by the archaeologist in coordination with YSMN, and all subsequent finds shall be subject to the Cultural Resource Monitoring and Treatment Plan. The Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project ground disturbing activities, should YSMN elect to place a monitor on-site.

Subsection 3.5.4, Environmental Impacts under Impact Question B on page 3.5.17 and 3.5.18 is revised as follows:

**b) Would the Project result in a substantial adverse change to a unique archaeological resource, pursuant to Section 15064.5?**

As discussed in Section 3.5, no known archaeological resources are within the Project's APE/API. Thus, the Project would not result in adverse change to a known unique archaeological resource. The Project would involve excavation or trenching for the MCC foundations and electrical conduit up to 5 feet deep, which would have the potential to cause inadvertent discovery of buried archaeological resources. As discussed in Section 3.5.1, the potential for encountering buried archaeological resources would be low but cannot be ruled out. PG&E ~~would~~ proposed to implement APM CUL 2, requiring workers to follow detailed procedures if inadvertent discoveries are identified during construction. While the APM~~s~~ would reduce impacts on a unique archaeological resource, the project could destroy a unique archaeological resource if one were to occur in the area of trenching or foundation excavation as the workers engaged in construction are not focused on identification of cultural resources and the impact would be significant as APM CUL-2 does not define procedures for a historic properties treatment plan in the event the resource cannot be avoided. Mitigation Measure CUL -1 requires inviting a tribal monitor from one tribe to inspect for potential archaeological deposits or tribal cultural resources during trenching and excavation activities to ensure that a unique archaeological resource would be identified ~~and avoided~~ if one occurred in the work area. Mitigation Measure CUL-2 supersedes APM CUL-2 and requires a Historic Properties Treatment Plan to address impacts on any resources that cannot be avoided. The resulting impact on the significance of a unique archaeological resource would be less than significant with mitigation.

## 3.8 Changes to Section 3.10, Hydrology and Water Quality

The first paragraph under subsection 3.10.1, Environmental Setting (Water Quality) on page 3.10-3 is revised as follows:

**Water Quality**

The groundwater beneath the Project site has been affected by historical facility operations. Between 1952 and 1964, untreated cooling tower water containing chromium was discharged to unlined ponds at the Hinkley Compressor Station. The discharge percolated through the soils to the underlying aquifer, resulting in elevated chromium concentrations in the groundwater (~~CRWQCB~~ LRWQCB 2013).

Subsection 3.10.4, Environmental Impacts (Direct and Indirect Effects) under Impact Question B on page 3.10-10 is revised as follows:

**b) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

**Project Construction**

Construction would involve ground-disturbing activities, such as trenching, and excavating for equipment foundations~~, and grading~~ for staging areas. These activities would have the potential to cause erosion and mobilize sediments or other pollutants that could degrade surface water quality if they were to enter a water body. However, no surface water bodies are present in the Project site, and the nearest mapped surface waters are several miles away. The Project would disturb more than 1 acre of land and would be required to comply with the requirements of the Construction General Permit, which would mandate preparation and implementation of an SWPPP. The SWPPP would identify site-specific BMPs for erosion control, sediment containment, and spill prevention. These measures would be implemented so that construction-related stormwater discharges would not violate the water quality standards or waste discharge requirements.

Subsection 3.10.4, Environmental Impacts under Impact Question C (Direct and Indirect Effects) on page 3.10-11 is revised as follows:

**c) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:**

**(i) result in substantial erosion or siltation on or off-site?**

The Project site is within the Hinkley Compressor Station facility. Most ground-disturbing work would occur on paved or compacted surfaces, and the small areas of ~~grading or~~ trenching would be stabilized with erosion and sediment control BMPs, required under the Construction General Permit. No natural drainages are in the Project site, and no work would occur in a stream or river. With implementation of the BMPs identified in the Project-specific SWPPP, prepared in compliance with the Construction General Permit, the potential for erosion or siltation would be minimized. Therefore, the impact would be less than significant. No mitigation is required.

The reference under 3.10.5, on page 3.10-13 is revised as follows:

~~CRWQCB~~ LRWQCB. 2013. "Final Environmental Impact Report Comprehensive Groundwater Cleanup Strategy for Historical Chromium Discharges from PG&E's Hinkley Compressor Station, San Bernardino County."

## 3.9 Changes to Section 3.16, Recreation

The Environmental Impacts summary table under 3.16, Recreation on page 3.16-1 is revised as follows:

| Environmental Impacts | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| **16. RECREATION.** | | | | |
| a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ☒ | ☐ | ☐ | ☒ |
| b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | ☐ | ☐ | ☐ | ☒ |

## 3.10 Changes to Section 3.18, Tribal Cultural Resources

Subsection 3.18.4, Environmental Impacts under Impact Question A on page 3.18-4 is revised as follows:

**a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Section 21074 of the PRC as a site, feature, place, or cultural landscape that is defined geographically in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

**(i) Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in Section 5020.1(k) of the PRC.**

**(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Section 5024.1, subdivision (c) of the PRC. In applying this criterion, the lead agency must consider the significance of the resource to a California Native American tribe:**

No tribal cultural resources that are listed or eligible for listing in the CRHR has been identified within the Project APE/API or has been reported by any Native Americans during AB 52 consultation efforts. Although the potential for encountering subsurface cultural resources would be low, the Project would involve excavation to a depth of 5 feet at the foundations and trenches. Thus, the potential would exist for tribal cultural resources to be found in excavations during Project construction.

PG&E has proposed implementation of APM CUL-1, which would require worker training, and implementation of APM CUL-2, which would require halting construction activities within 100 feet of the discovery, contacting the Project Environmental

Inspector and the PG&E Cultural Resource Specialist, and having qualified personnel evaluate the significance of the discovery following procedures for determining eligibility. In the event that tribal cultural resources are discovered, the protocol described in APM TCR-1 would be followed, including the procedure for determining eligibility of a resource. Although the APMs would reduce the likelihood of impact on tribal cultural resources because construction workers would be engaged in construction and not actively observing cultural or tribal cultural resources, the potential would remain to disturb a tribal cultural resource. In addition, because the APMs do not define specific procedures for coordination with Native Americans for pre-contact resources or require preparation of a Historic Properties Treatment Plan in the event a resource cannot be avoided, the impact would remain significant. ~~Thus, PG&E also has proposed implementing~~ Mitigation Measure Culutral-1 ~~which~~ would require inviting a tribal monitor from one tribe to inspect for potential archaeological deposits or tribal cultural resources during trenching and excavation activities. In the event of discovery of archaeological deposits, the archaeologist would have the authority to halt work within 100 feet of the discovery, and the CPUC would be notified within 48 hours of the discovery. Mitigation Measure CUL-2 requires that the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find and that a Historic Properties Treatment Plan be prepared for any resources that cannot be avoided. All procedures in Mitigation Measure CUL-2 ~~APM CUL~~ -2 would be implemented during investigation of the resource.

PG&E would implement APM CUL-1, ~~APM CUL 2~~, APM TCR-1, ~~and~~ Mitigation Measure Culutral-1, and Mitigation Measure CUL-2 to reduce the impact on the tribal cultural resource. The impact would be less than significant with mitigation incorporated.

## 3.11 Changes to Section 3.19, Utilities and Service Systems

The first paragraph under 3.19.1, Environmental Setting (Water Services) on page 3.19-1 is revised as follows:

**Water Services**

Domestic water sources for the unincorporated areas of San Bernardino County generally are supplied through local and imported water, with approximately 85 percent of the domestic water supplied by local groundwater sources and the remaining 15 percent supplied by imported purchased water (~~CRWQCB~~ LRWQCB 2013). Imported water is purchased primarily by several regional water wholesalers from the Metropolitan Water District through the State Water Project as a supplemental source to local groundwater supplies. Multiple retail and private water purveyors manage most of the groundwater pumping and distribution.

The second paragraph under 3.19.1, Environmental Setting (Stormwater) on page 3.19-2 is revised as follows:

> No existing stormwater facilities were identified on or near the Project site. The Project site is located on a flat area; therefore, most of the stormwater drainage would likely evaporate or infiltrate into surface soils rather than being transported as sheet flow (~~CRWQCB~~ LRWQCB 2013).

The second paragraph under 3.19.4, Environmental Impacts (Methodology and Assumptions) on page 3.19-7 is revised as follows:

> The analysis is based on a review of San Bernardino County plans, ~~Central Valley~~ Lahontan Regional Water Quality Control Board ~~(CRWQCB)~~ (LRWQCB) information, and utility provider websites. The evaluation considers the current capacity and locations of existing utilities and anticipated needs. Impacts are characterized by whether the Project would significantly increase or exceed the demand or capacity of these facilities.

Beginning at Impact Question D under 3.19.4, Environmental Impacts on page 3.19-9 revisions are as follows:

> **d) Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**
>
> Construction of the Project would generate approximately 35 tons of solid waste with approximately 75 percent of the waste being metal. The Project construction workers (up to 18 daily) would generate minimal food, glass, paper, plastic, and packing waste. Waste materials generated during construction would be reused, recycled, or salvaged where reasonably feasible to mitigate impacts as desc. Removed electrical equipment would be managed as e-waste, with metal components sorted for recycling or disposal. Concrete debris from the motor control center (MCC) foundation removal would be gathered for recycling. Construction debris would be picked up regularly from the work area and stored in approved onsite containers. At the construction staging area, crews would gather and sort recyclable and salvageable materials into bins for recycling, e-waste, or disposal to mitigate impacts as described in APM GHG-1. Debris would be hauled away for recycling or disposal periodically during construction. Salvageable items (such as wire or metal that can be reused) would be taken to recycling facilities or sold through available markets. Some examples of items that may be recycled include copper wire or metal equipment housing, cable reels, pallets, and broken hardware. Materials, including clean soil, would be taken to facilities such as those in Table 3.19-1 for recycling or disposal. The landfills and recycling facilities serving the area have sufficient capacity for waste that would be generated by Project construction. In addition the Project recycling would be consistent with California solid waste reduction goals for construction and demolition waste; therefore, impacts from generation of solid waste in

excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals would be less than significant.

**e) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

PG&E would manage solid waste generated during construction and maintenance and operation by hauling to appropriate landfills with sufficient capacity as described in response to d) above. PG&E would reuse and recycle construction and demolition waste to divert debris from landfill disposal when reasonably feasible as described in APM GHG-1. PG&E or its designated and licensed hauler would apply for an Industrial Waste Hauler Permit as needed. PG&E would comply with all applicable federal, state, and local management and reduction statutes and regulations related to solid waste; therefore, no impact would occur.

The references under 3.19.5, on page 3.19-10 are revised as follows:

~~CRWQCB~~ LRWQCB. 2013. *Final Environmental Impact Report Comprehensive Groundwater Cleanup Strategy for Historical Chromium Discharges from PG&E's Hinkley Compressor Station, San Bernardino County*.
~~CRWQCB~~ LRWQCB. 2019. "Agenda Report for Item 10, Revised Waste Discharge Requirements and Water Reclamation Requirements for the City of Barstow, Barstow Wastewater Treatment Plant, San Bernardino County." July 1.

## 3.12 Changes to Section 3.20, Wildfire

The third paragraph under 3.20.1, Environmental Setting (Fire Environment) on page 3.20-2 is revised as follows:

Annual temperatures for the area surrounding the Project site vary greatly, with maximum temperatures equaling or exceeding 90°F an average of 131 times per year, and minimum temperatures equaling or dropping below 32°F an average of 38 times per year. The annual average January temperatures are 35°F (low) and 61°F (high), and the average July temperatures are 69°F (low) and 102°F (high). The annual average precipitation is 5.1 inches. The predominant wind direction at the Barstow–Daggett Airport, approximately 21 miles east–southeast of the Project site, is from the west at approximately 11.3 mph (~~CRWQCB~~ LRWQCB 2013).

The reference under 3.20.5, on page 3.20-8 is revised as follows:

~~CRWQCB~~ LRWQCB. 2013. *Final Environmental Impact Report Comprehensive Groundwater Cleanup Strategy for Historical Chromium Discharges from PG&E's Hinkley Compressor Station, San Bernardino County*.

## 3.13 Changes to Section 3.21, Mandatory Findings of Significance

Subsection 3.21.1, Impact Discussion under Impact Question A under the header titled California History or Prehistory on page 3.21-3 is revised as follows:

> California History or Prehistory
>
> As discussed in Section 3.5: Cultural Resources, although there are no known archaeological resources within the Project's area, the Project could result in inadvertent discovery of buried archaeological resources including examples of the major periods of California history or prehistory during ground disturbing construction activities. Implementation of APM-CUL 1 and APM CUL-2 would reduce impacts on example of California history or prehistory by requiring worker training and defining avoidance buffers in the event of discovery of a resource; however, the potential to damage or destroy an example of major periods of California history or prehistory would remain as workers would not be inspecting excavations for cultural resources and the impact would be significant. Mitigation Measure CUL-1 requires an archaeologist and tribal monitor to monitor trenches and foundation excavations, and Mitigation Measure CUL-2 requires a Historic Properties Treatment Plan for any discovered resources to avoid damage to example of major periods of California history or prehistory. The resulting impact would be less than significant with mitigation.

Subsection 3.21.1 under Impact Question B under the header titled Cultural Resources *Potential Cumulative Impacts* on page 3.21-5 is revised as follows:

> *Potential Cumulative Impacts*
>
> The loss of several resources from a particular tribe or representing one particular time could result in significant impacts to the information that those resources possess. If any of the cumulative projects could each impact resources with similar information about a particular tribe or timeframe, a cumulatively significant impact could occur. All the cumulative projects listed in Table 3.21-1 have the potential to impact cultural resources that are of a similar nature to the Project. The cumulative impact on cultural resources would be significant and the Project would contribute considerably to that impact due to trenching and foundation excavation activities, which could damage or destroy cultural resources.
>
> APM CUL-1, APM CUL-2, and APM CUL-3 require procedures to train workers, procedures to address unanticipated cultural resource discovery, as well as procedures to follow upon discovery of human remains. While the APMs would reduce impact on cultural resources trenching and excavation activities could still contribute considerably to the cumulative impact as workers may not be aware of the resources within the excavation area. Mitigation Measure CUL-1 requires an archaeologist and tribal monitor to inspect trenching and excavation activities to avoid cultural resources and Mitigation Measure CUL-2 defines requirements for a Historic Properties Treatment Plan for any

resources that cannot be avoided. With implementation of Mitigation Measure ~~CUL~~ Cultural-1, the Project's contribution to cumulative impacts on historic and archaeological resources would be less than significant.