Negative Declaration & Notice Of Determination

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING
976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

ENVIRONMENTAL DETERMINATION NO. ED17-032 **DATE:** October 5, 2018

PROJECT/ENTITLEMENT: PG&E Vegetation Management Minor Use Permit/Coastal Development Permit; DRC2016-00135

APPLICANT NAME: PG&E via Vick Germany **Email:** V1G6@pge.com
ADDRESS: 6111 Bollinger Canyon Road #3110-C, San Ramon, CA 94583
CONTACT PERSON: Vick Germany **Telephone:** 925-328-5176

PROPOSED USES/INTENT: Request by Pacific Gas and Electric Company (PG&E) for a minor use/coastal development permit to allow PG&E to perform vegetation maintenance (e.g., removing trees and brush) within PG&E's existing rights-of-way (ROW) in three areas that contain high-pressure natural gas transmission pipelines. Vegetation management is proposed to improve emergency access and for safety concerns. PG&E proposes to remove woody vegetation within 5 feet of the outer edge of gas pipeline 306 and remove trees out to 14 feet at three sites: RW-V-518-13N, RW V 523-13, and RW-V-518-13S. All herbaceous vegetation within the sites would be retained. Approximately 36 trees and 38 brush units (one brush unit equals 264.20 cubic feet, for a total of approximately 10,000 cubic feet of brush) of mixed species would be removed from three waterways, and approximately four willow trees would be pruned. The project sites are within the Agriculture land use category.

LOCATION: The northernmost site, RW-V-518-13N, is located approximately 3,500 feet north of State Route (SR) 41 (Atascadero Road); RW-V-523-13 is located less than 200 feet south of SR-41 within Morro Creek; and RW-V-518-13S, is located approximately 2,000 feet south of SR-41 and 500 feet north of Little Morro Creek Road, approximately on-half mile east of the City of Morro Bay, within the Estero planning area.

LEAD AGENCY:
County of San Luis Obispo
Dept of Planning & Building
976 Osos Street, Rm. 200
San Luis Obispo, CA 93408-2040
Website: http://www.sloplanning.org

STATE CLEARINGHOUSE REVIEW: YES ☒ **NO** ☐

OTHER POTENTIAL PERMITTING AGENCIES: California Department of Fish and Wildlife, California Coastal Commission, Regional Water Quality Control Board

ADDITIONAL INFORMATION: Additional information pertaining to this Environmental Determination may be obtained by contacting the above Lead Agency address or (805)781-5600.
COUNTY "REQUEST FOR REVIEW" PERIOD ENDS AT ..... 4:30 p.m. (2 wks from above DATE)

30-DAY PUBLIC REVIEW PERIOD begins at the time of public notification

Notice of Determination

State Clearinghouse No. _____

This is to advise that the San Luis Obispo County_____ as ☐ *Lead Agency* ☐ *Responsible Agency* approved/denied the above described project on _____, and has made the following determinations regarding the above described project:

The project will not have a significant effect on the environment. A Negative Declaration was prepared for this project pursuant to the provisions of CEQA. Mitigation measures and monitoring were made a condition of approval of the project. A Statement of Overriding Considerations was not adopted for this project. Findings were made pursuant to the provisions of CEQA.

This is to certify that the Negative Declaration with comments and responses and record of project approval is available to the General Public at the 'Lead Agency' address above.

	Kate Shea (kbshea@co.slo.ca.us)		County of San Luis Obispo
Signature	**Project Manager Name**	**Date**	**Public Agency**

Initial Study Summary – Environmental Checklist

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING
976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

(ver 5.10) Using Form

Project Title & No. PG&E Gas Pipeline 306 Vegetation Management Project Minor Use Permit /Coastal Development Permit ED17-032 (DRC2016-00135)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The proposed project could have a "Potentially Significant Impact" for at least one of the environmental factors checked below. Please refer to the attached pages for discussion on mitigation measures or project revisions to either reduce these impacts to less than significant levels or require further study.

☐ Aesthetics	☐ Geology and Soils	☐ Recreation
☐ Agricultural Resources	☐ Hazards/Hazardous Materials	☐ Transportation/Circulation
☐ Air Quality	☐ Noise	☐ Wastewater
☒ Biological Resources	☐ Population/Housing	☐ Water /Hydrology
☒ Cultural Resources	☐ Public Services/Utilities	☐ Land Use

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the Environmental Coordinator finds that:

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by, or agreed to, by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Emily Creel, SWCA — Prepared by (Print)
Signature
09/21/2018 — Date

Kate Shea, Sr. Planner — Reviewed by (Print)
Kate Shea for Ellen Carroll, Environmental Coordinator (for) — Signature
9/25/2018 — Date

Project Environmental Analysis

The County's environmental review process incorporates all of the requirements for completing the Initial Study as required by the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The Initial Study includes staff's on-site inspection of the project site and surroundings and a detailed review of the information in the file for the project. In addition, available background information is reviewed for each project. Relevant information regarding soil types and characteristics, geologic information, significant vegetation and/or wildlife resources, water availability, wastewater disposal services, existing land uses and surrounding land use categories and other information relevant to the environmental review process are evaluated for each project. Exhibit A includes the references used, as well as the agencies or groups that were contacted as a part of the Initial Study. The County Planning Department uses the checklist to summarize the results of the research accomplished during the initial environmental review of the project.

Persons, agencies or organizations interested in obtaining more information regarding the environmental review process for a project should contact the County of San Luis Obispo Planning Department, 976 Osos Street, Rm. 200, San Luis Obispo, CA, 93408-2040 or call (805) 781-5600.

A. PROJECT

DESCRIPTION: Request by Pacific Gas and Electric Company (PG&E) for a minor use/coastal development permit to allow PG&E to perform vegetation maintenance (e.g., removing trees and brush) within PG&E's existing rights-of-way (ROW) in three areas that contain high-pressure natural gas transmission pipelines. Vegetation management is proposed to improve emergency access and for safety concerns. PG&E proposes to remove woody vegetation within 5 feet of the outer edge of gas pipeline 306 and remove trees out to 14 feet at three sites: RW-V-518-13N, RW-V-523-13, and RW-V-518-13S (refer to Figure 1). All herbaceous vegetation within the sites would be retained. Approximately 36 trees and 38 brush units (one brush unit equals 264.20 cubic feet, for a total of approximately 10,000 cubic feet of brush) of mixed species would be removed from three waterways, and approximately four willow trees would be pruned.

The three sites are located east of the community of Morro Bay within the coastal zone of San Luis Obispo County in the Estero planning area. All sites contain riparian corridors composed primarily of willow. The sites contain environmentally sensitive habitat areas (ESHA) and the proposed vegetation removal was determined to be "major vegetation removal" as defined in the document entitled *Repair, Maintenance and Utility Hookups*, adopted by the California Coastal Commission on September 5, 1978.

The northernmost site, RW-V-518-13N, is located approximately 3,500 feet north of State Route (SR) 41 (Atascadero Road) within a small, unnamed tributary to Morro Creek, surrounded by rangelands. RW-V-523-13 is located less than 200 feet south of SR-41 within Morro Creek and is bound to the south by agricultural row crops and upland habitat to the north, transitioning to rural residential property adjacent to SR-41. The southernmost site, RW-V-518-13S, is located approximately 2,000 feet south of SR-41 and 500 feet north of Little Morro Creek Road. RW-V-518-13S is within Little Morro Creek, a tributary to Morro Creek, and is surrounded by agricultural row crops.

The purpose of the project is to manage vegetation in compliance with 49 Code of Federal Regulations 192, *Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards*; California Public Utilities Commission General Order 112-E, *State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems*; and PG&E's Utility Standard TD-4490S, *Gas Pipeline Rights-of-Way Management*. In addition, management of vegetation within PG&E's ROW would help minimize response times in case of a gas leak or other required maintenance needs.

Vegetation maintenance activities are anticipated to require 1 to 2 days of work at the RW-V-518-13N and RW-V-518-13S sites and approximately 1 week at RW-V-523-13. All work would occur under naturally dry conditions with no stream flow present within the sites (typically June 15 to November 1). Furthermore, no work would occur during or within 24 hours following significant rainfall events defined as one-quarter inch of rain or greater in a 24-hour period. Work would occur during daylight hours, beginning at least one-half hour after sunrise and ending at least one-half hour before sunset, Monday through Saturday.

The selective removal of trees and brush is not expected to result in the creation of bare ground surface. Vegetation would be cut to within 6 inches of ground level. Stumps (and corresponding root ball) up to approximately 1 foot in height above ground level will remain. PG&E proposes to manage vegetation manually with chainsaws and truck-towed chippers, and similar equipment. Where work is located adjacent to or within an ESHA, work will be conducted with hand tools only (e.g., chainsaw, loppers). Vegetation removal crews would have a "water buffalo" (i.e., a type of water tank), or equivalent equipment, with a minimum capacity of 300 gallons for dust and fire suppression. There would be no vehicle traffic within stream bed or banks. Surface soil disturbance would be limited to vehicle traffic into and out of sites along overland access routes that occur outside of stream bed, banks, or channels. Damage to surface soil from tree removal is not anticipated as large trees would be sectioned and sections lowered to the ground with ropes. No digging or excavating would occur. Removed vegetation would be hauled to a designated location to be chipped. Once initial vegetation removal is completed, ongoing maintenance would be performed on an as-needed basis.

A California Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement would be required. PG&E received a Streambed Alteration Agreement for the RW-V-518-13N and RW-V-518-13S sites. RW-V-523-23 was later added to the project and a final Lake and Streambed Alteration Agreement will not be received until the CEQA process has been completed for this site. PG&E has entered into a Habitat Restoration and Enhancement Agreement with the Upper Salinas Las Tablas Resource Conservation District to provide for off-site compensatory mitigation for the RW-V-523-13, RW-V-518-13N and RW-V-518-13S sites. CDFW approved the restoration plan for RW-V-518-13N and RW-V-518-13S. The plan also includes tree planting for RW-V-523-13, but California Department of Fish and Wildlife (CDFW) has not approved that part of the plan pending completion of the CEQA process. PG&E shall implement the plan that would result in the planting of 172 riparian trees to mitigate for the loss of removed trees.

Per standard company protocols, PG&E would prepare an Activity Specific Erosion and Sediment Control Plan (A-ESCP), health and safety plan, and hazardous substance control and emergency response plan for the project. PG&E would also implement a project worker environmental awareness program that would address potential environmental issues and appropriate work practices specific to this project. This awareness training would include spill prevention and response measures, and proper implementation of Best Management Practices (BMPs). The training would emphasize site-specific physical conditions to improve hazard prevention (such as identification of flow paths to nearest water bodies) and includes a review of all site-specific water quality requirements, including applicable portions of the A-ESCP, health and safety plan, and hazardous substance control and emergency response plan. Crews would provide secondary containment for any hazardous materials. Traffic control devices and signage would be used as needed when work vehicles are entering or exiting SR-41.

PG&E provides notification to landowners a minimum of 30 days before the start of any project in a PG&E ROW. Notification would be provided by mailing notices to all properties within 300 feet of the work areas. The announcement would describe where, when, and what access and project activities will occur and point-of-contact information.

ASSESSOR PARCEL NUMBER(S): 073-085-027, 073-084-013, and 073-051-059

SUPERVISORIAL DISTRICT # 2

Site	Latitude	Longitude
RW-V-518-13N	35.398882	-120.841124
RW-V-523-13	35.387039	-120.841494
RW-V-518-13S	35.379685	-120.845381

B. EXISTING SETTING

PLAN AREA: Estero **SUB**: **COMM:** Rural

LAND USE CATEGORY: Agriculture

COMB. DESIGNATION: Flood Hazard, Geologic Study Area

PARCEL SIZE: 187.65, 251.25, and 62.04 acres

TOPOGRAPHY: Moderately sloping to level

VEGETATION: Riparian

EXISTING USES: Agricultural uses, grazing, private utility easements

SURROUNDING LAND USE CATEGORIES AND USES:

North: Agriculture; agriculture/grazing	*East:* Agriculture; agriculture/grazing
South: Agriculture; agriculture/grazing	*West:* Agriculture; agriculture/grazing, City of Morro Bay

C. ENVIRONMENTAL ANALYSIS

During the Initial Study process, at least one issue was identified as having a potentially significant environmental effect (see following Initial Study). Those potentially significant items associated with the proposed uses can be minimized to less than significant levels.

COUNTY OF SAN LUIS OBISPO
INITIAL STUDY CHECKLIST

1. AESTHETICS *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Create an aesthetically incompatible site open to public view?	☐	☐	☐	☒
b) Introduce a use within a scenic view open to public view?	☐	☐	☒	☐
c) Change the visual character of an area?	☐	☐	☒	☐
d) Create glare or night lighting, which may affect surrounding areas?	☐	☐	☐	☒
e) Impact unique geological or physical features?	☐	☐	☒	☐
f) Other: _____	☐	☐	☐	☒

Aesthetics

Setting. The three project sites are located in a rural area of unincorporated San Luis Obispo County. The visual landscape of the project area is characterized by rolling hillsides, riparian corridors, wetland areas, open spaces, agricultural and ranch roads, row crops, scattered residences, and agricultural accessory structures, including barns. The project is not located within the County's Visual Areas combining designation but is located within 0.49 miles of SR-41 (an eligible state scenic highway) and 0.57 miles of SR-1 (an officially designated State Scenic Highway and All American Road).

Impact. The project is considered compatible with the surrounding uses, is consistent with the visual character of the area, and would not produce any new source of night lighting or glare. Short-term project-related effects would include the presence of increased vegetation maintenance equipment. These impacts would be limited in duration and nature and would not result in significant visual impacts. Portions of the project sites may be visible from proximate scenic highways; however, views of the sites would be almost entirely obscured by existing riparian vegetation, intervening development, and topography. The limited vegetation removal proposed would not be discernable within the larger viewshed and would not substantially alter existing public views from SR-1 or SR-41. No visually significant rock outcroppings or historic buildings would be removed and no substantial change in views from an eligible state scenic highway would occur. Therefore, no significant visual impacts would occur.

Mitigation/Conclusion. No significant impacts related to aesthetics or visual resources would occur. No mitigation measures are necessary.

2. AGRICULTURAL RESOURCES *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Convert prime agricultural land, per NRCS soil classification, to non-agricultural use?	☐	☐	☐	☒
b) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?	☐	☐	☐	☒
c) Impair agricultural use of other property or result in conversion to other uses?	☐	☐	☐	☒
d) Conflict with existing zoning for agricultural use, or Williamson Act program?	☐	☐	☐	☒
e) Other: _____	☐	☐	☐	☒

Agricultural Resources

Setting. Project Elements. The following area-specific elements relate to the property's importance for agricultural production:

Land Use Category: Agriculture

State Classification: Prime farmland if irrigated (APN: 073-051- 059) and not prime farmland (APN: 073-084-013 and 073-085-027).

Historic/Existing Commercial Crops: None

In Agricultural Preserve? No, within Choro Valley and Cayucos Agricultural Preserve Areas.

Under Williamson Act contract? No

The soil type(s) and characteristics on the subject property include:

Diablo and Cibo clays (15 - 30 % slope).

Diablo. This moderately sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, slow percolation. The soil is considered Class IV without irrigation and Class is not rated when irrigated.

Diablo and Cibo clays (30 - 50 % slope).

Diablo. This steeply sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, slow percolation. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Lopez very shaly clay loam (30 - 75% slope). This steeply to very steeply sloping, shallow gravelly fine loamy soil is considered very poorly drained. The soil has low erodibility and low shrink-swell characteristics, as well as having potential septic system constraints due to: shallow depth to bedrock. The soil is considered Class VII without irrigation and Class is not rated when irrigated.

Marimel silty clay loam, drained . This nearly level soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: slow percolation. The soil is considered Class III without irrigation and Class I when irrigated.

Psamments and Fluvents, occasionally flooded. This nearly level soil has unrated drainage characteristics. The soil has unrated erodibility and unrated shrink-swell characteristics, as well as having unrated septic system constraints. The soil is considered Class VI without irrigation and Class VI when irrigated.

Salinas silty clay loam (2 - 9 % slope). This gently sloping fine loamy bottom soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: slow percolation. The soil is considered Class III without irrigation and Class I when irrigated.

Impact. The project is located in an agricultural area. The applicant (PG&E) is proposing to conduct vegetation maintenance to improve emergency access and for safety concerns at three sites RW-V-518-13N, RW-V-523-13, and RW-V-518-13S. No development is proposed at any of the three sites. Vegetation removal would occur within 6 inches of the ground surface and no ground disturbing activities are proposed. Therefore, no direct impacts to agricultural soils would occur. The proposed vegetation removal would have no indirect impact on proximate agricultural uses or resources. Therefore, no significant impacts to agricultural resources would occur.

Mitigation/Conclusion. No mitigation measures are necessary.

3. AIR QUALITY

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Violate any state or federal ambient air quality standard, or exceed air quality emission thresholds as established by County Air Pollution Control District?	☐	☐	☐	☒
b) Expose any sensitive receptor to substantial air pollutant concentrations?	☐	☐	☒	☐
c) Create or subject individuals to objectionable odors?	☐	☐	☒	☐
d) Be inconsistent with the District's Clean Air Plan?	☐	☐	☒	☐
e) Result in a cumulatively considerable net increase of any criteria pollutant either considered in non-attainment under applicable state or federal ambient air quality standards that are due to increased energy use or traffic generation, or intensified land use change?	☐	☐	☒	☐

3. AIR QUALITY *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
GREENHOUSE GASES				
f) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***	☐	☐	☒	☐
g) ***Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***	☐	☐	☒	☐
h) ***Other:*** _____	☐	☐	☐	☒

Air Quality

Setting. The San Luis Obispo Air Pollution Control District (SLOAPCD) has developed and updated their CEQA AIR Quality Handbook to evaluate project specific impacts and help determine if air quality mitigation measures are needed, or if potentially significant impacts could result (SLOAPCD 2012). To evaluate long-term emissions, cumulative effects, and establish countywide programs to reach acceptable air quality levels, a Clean Air Plan has been adopted (prepared by SLOAPCD).

Greenhouse Gas (GHG) Emissions are said to result in an increase in the earth's average surface temperature. This is commonly referred to as global warming. The rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system. This is also known as climate change. These changes are now thought to be broadly attributed to GHG emissions, particularly those emissions that result from the human processing and use of fossil fuels.

The passage of AB32, the California Global Warming Solutions Act of 2006, recognized the need to reduce GHG emissions and set the greenhouse gas emissions reduction goal for the State of California into law. The law required that by 2020, State emissions must be reduced to 1990 levels. This is to be accomplished by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions. Subsequent legislation (e.g., SB97-Greenhouse Gas Emissions bill) directed the California Air Resources Board (CARB) to develop statewide thresholds.

In March 2012, the SLOAPCD approved thresholds for GHG emission impacts, and these thresholds have been incorporated the SLOAPCD's CEQA Air Quality Handbook. SLOAPCD determined that a tiered process for residential / commercial land use projects was the most appropriate and effective approach for assessing the GHG emission impacts. The tiered approach includes three methods, any of which can be used for any given project:

1. Qualitative GHG Reduction Strategies (e.g. Climate Action Plans): A qualitative threshold that is consistent with AB 32 Scoping Plan measures and goals; or,
2. Bright-Line Threshold: Numerical value to determine the significance of a project's annual GHG emissions; or,
3. Efficiency-Based Threshold: Assesses the GHG impacts of a project on an emissions per capita basis.

For most projects the Bright-Line Threshold of 1,150 Metric Tons CO2/year (MT CO2e/yr) will be the

most applicable threshold. In addition to the residential/commercial threshold options proposed above, a bright-line numerical value threshold of 10,000 MT CO2e/yr was adopted for stationary source (industrial) projects.

It should be noted that projects that generate less than the above-mentioned thresholds will also participate in emission reductions because air emissions, including GHGs, are under the purview of the CARB (or other regulatory agencies) and will be "regulated" either by CARB, the Federal Government, or other entities. For example, new vehicles will be subject to increased fuel economy standards and emission reductions, large and small appliances will be subject to more strict emissions standards, and energy delivered to consumers will increasingly come from renewable sources. Other programs that are intended to reduce the overall GHG emissions include Low Carbon Fuel Standards, Renewable Portfolio standards, and Clean Car standards. As a result, even the emissions that result from projects that produce fewer emissions than the threshold will be subject to emission reductions.

Under CEQA, an individual project's GHG emissions will generally not result in direct significant impacts. This is because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation.

Impact. There are five residential dwelling units and a mobile home park surrounding the RW-V-523-13 project site that are considered sensitive receptors. The nearest sensitive receptor to RW-V-523-13 is a residential dwelling approximately 50 feet northeast of the project site. The other four dwelling units and the mobile home park are within 1,000 feet of the project site. There are no sensitive receptors near RW-V-518-13N and RW-V-518-13S. As mentioned above, PG&E is proposing to conduct vegetation maintenance to improve emergency access and for safety concerns at three sites RW-V-518-13N, RW-V-523-13, and RW-V-518-13S. The project would generate vehicle emissions from use of equipment and worker trips. Use of vehicles on unpaved roadways, overland access, and vegetation removal would generate fugitive dust. The fossil fuel equipment used for vegetation removal as needed and for routine maintenance would be limited to chainsaws, crew trucks, a chip truck, and a tow-behind chipper. PG&E proposes to implement standard construction practices, including dust control measures to reduce emissions of fugitive dust and limits on engine idling to avoid unnecessary equipment exhaust emissions. No Air Quality thresholds would be exceeded, and no mitigation measures would be necessary based on the SLOAPCD's CEQA Handbook (2012).

The potential for significant air quality impacts is minimized by the limited duration and scale of the project, and the potential for emissions to approach California Ambient Air Quality Standards (CAAQS) or SLOAPCD thresholds of significance is negligible. The proposed project would not violate any air quality standard or contribute substantially to an existing project air quality violation.

The proposed project would not emit significant quantities of criteria pollutants during the proposed construction period (up to 1 week) and long-term emissions resulting from maintenance activities would be negligible. The project would not cause any growth-inducing effects or cause an exceedance of established population projections to occur, which may indirectly generate additional emission sources. The vegetation removal activities are proposed in proximity to nearby sensitive receptors but would not generate substantial amounts of fugitive dust or DPM due to the lack of ground disturbance or use of heavy equipment. The implementation of PG&E's standard construction practices would maintain equipment in proper working condition and minimize equipment idling as feasible. The project would not result in cumulatively considerable net increases of any criteria pollutant and would not exceed applicable thresholds. Furthermore, odors from diesel combustion used in the machinery performing the work would be minimized by using ultra-low sulfur diesel fuel. Impacts to Air Quality and Greenhouse Gas Emissions would be less than significant.

Mitigation/Conclusion. No mitigation measures are necessary.

4. BIOLOGICAL RESOURCES

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Result in a loss of unique or special status species* or their habitats?	☐	☒	☐	☐
b) Reduce the extent, diversity or quality of native or other important vegetation?	☐	☒	☐	☐
c) Impact wetland or riparian habitat?	☐	☐	☒	☐
d) Interfere with the movement of resident or migratory fish or wildlife species, or factors, which could hinder the normal activities of wildlife?	☐	☒	☐	☐
e) Conflict with any regional plans or policies to protect sensitive species, or regulations of the California Department of Fish & Wildlife or U.S. Fish & Wildlife Service?	☐	☐	☒	☐
f) Other: _____	☐	☐	☒	☐

*** Species – as defined in Section15380 of the CEQA Guidelines, which includes all plant and wildlife species that fall under the category of rare, threatened or endangered, as described in this section.**

Setting. The biological resources section of this IS/MND is based on the Biological Resources Technical Report (BRTR), prepared for the proposed project by Aspen Environmental Group (Aspen 2017), and Technical Assistance Reports for Potential Impacts to California-Red-Legged Frog and South-Central California Coast Steelhead, prepared for the proposed project by SWCA Environmental Consultants, Inc. (SWCA 2014a-d).

Aspen biologists conducted a habitat-level biological survey of RW-V-523-13 on December 1, 2016. Previous surveys of the RW-V-523-13 site were conducted by SWCA (consulting biologists for PG&E) in August and September 2013 (SWCA 2014a, 2014c). SWCA also conducted a habitat-level biological survey of the RW-V-518-13N and RW-V-518-13S sites in August 2013 (SWCA 2014b, d). No protocol-level surveys or seasonally timed botanical surveys were conducted as part of the field investigations.

The biological resources associated with the project's existing setting are described in detail below.

Sensitive Habitats

Sensitive Natural Communities

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

Vegetation in the project sites consists primarily of riparian species (e.g., willows) that are growing in and along the unnamed tributary, Morro Creek, and Little Morro Creek. The riparian vegetation present best matches the description of arroyo willow thickets (*Salix lasiolepis* Shrubland Alliance) as described in a Sawyer et al. (2009). Arroyo willow thickets are ranked as S4 and therefore are not considered imperiled; however, these areas are considered sensitive vegetation for the purposes of this analysis because they are riparian habitats, determined by the San Luis Obispo County and California Coastal

Commission to be ESHAs under the Coastal Act; are CDFW-jurisdictional features; and provide habitat for sensitive wildlife species.

Federal/State Waters and Wetlands

State waters have been identified by the extent of riparian vegetation. Since all vegetation proposed for removal is within CDFW-jurisdictional features, the sites are subject to Section 1602 of California Department of Fish and Game Code. A Lake and Streambed Alteration Agreement is required to conduct project activities. In April 2016, PG&E received a Streambed Alteration Agreement (Notification number 1600-2014-0173-R4) for the RW-V-518-13N and RW-V-518-13S sites. RW-V-523-23 was later added to the project and a final Lake and Streambed Alteration Agreement will not be received until the CEQA process has been completed for this site.

No formal delineation of waters of the United States has been conducted at the project sites since no discharge of dredge or fill material is anticipated within the ordinary high water mark. Therefore, the project would not be subject to Section 401 or 404 permitting under the Clean Water Act (CWA). No formal delineation was conducted for wetlands that may be under the jurisdiction of the California Coastal Commission. The willows scheduled for removal within the project sites may fall under the jurisdiction of the California Coastal Commission, but are considered an allowable use within a wetland setback because the proposed project is vegetation maintenance (e.g., removing trees and brush) within PG&E's existing rights-of-way (ROW) in three areas that contain high-pressure natural gas transmission pipelines, and is in compliance with 49 Code of Federal Regulations 192, *Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards*; California Public Utilities Commission General Order 112-E, *State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems*; and PG&E's Utility Standard TD-4490S, *Gas Pipeline Rights-of-Way Management*. In addition, management of vegetation within PG&E's ROW would help minimize response times in case of a gas leak or other required maintenance needs.

Sensitive Species

Below is a summary of sensitive plant and animal species that were considered as part of this analysis.

Sensitive Plant Species

The record search identified 64 special-status plants that have been documented within the general region. Of these, 10 special-status plants were determined to have a low potential to be present based on the presence of potentially suitable habitat conditions at the project sites. These species are presented in Table 1. The remaining 54 species have no potential to be present based on the lack of suitable habitat conditions at the project sites. Seasonally timed rare plant surveys were not conducted at the project sites, but potential for occurrence of any rare plant species within the project sites was determined to be low due to limited habitat suitability.

Each of the 10 plants with a potential to occur within the project sites were assessed based on the following criteria:

- *Present*: Special-status species was observed within the project sites during recent botanical surveys or population has been acknowledged by CDFW, United States Fish and Wildlife Service (USFWS), or local experts.
- *High*: Both a documented recent record (within 10 years) exists of the taxa within the project sites or vicinity (approximately 5 miles) and the environmental conditions (including soil type) associated with taxa present within the project sites.
- *Moderate*: Both a documented recent record (within 10 years) exists of the taxa within the project sites or the immediate vicinity (approximately 5 miles) and the environmental conditions associated with taxa presence are marginal and/or limited within the project sites or the project sites are located within the known current distribution of the taxa and the environmental

conditions (including soil type) associated with taxa presence occur within the project sites.

- *Low*: A historical record (over 10 years) exists of the taxa within the project sites or general vicinity (approximately 10 miles) and the environmental conditions (including soil type) associated with taxa presence are marginal and/or limited within the project sites.

Table 1. Sensitive Plant Species Evaluated for Potential Occurrence

Species	Conservation Status	Habitat and Distribution	Blooming Period	Potential to Occur
Agrostis hooveri Hoover's bent grass	Fed: none Calif: 1B.2	Perennial bunchgrass; chaparral, woodlands, and grasslands. Santa Barbara and San Luis Obispo Counties; about 200 to 2,000 ft. elev.	Apr–Jun	**Low.** Limited suitable habitat present. Known occurrences within 3.5 miles of the project.
Astragalus didymocarpus var. *milesianus* Miles' milk-vetch	Fed: none Calif: 1B.2	Annual herb; grassy areas near the coast; below 1,300 ft. elev.	Mar–Jun	**Low.** Marginally suitable habitat present. Known occurrence within 3 miles of the project.
Carex obispoensis San Luis Obispo sedge	Fed: none Calif: 1B.2	Perennial herb; found near springs and streamsides in chaparral generally on serpentine; below 2,625 ft. elev.	Apr–Jun	**Low.** Minimally suitable habitat. Known occurrence within approximately 10 miles of the project.
Castilleja densiflora var. *obispoensis* San Luis Obispo owl's-clover	Fed: none Calif: 1B.2	Annual; typically on serpentine substrates in meadows, seeps, and native grasslands. San Luis Obispo County from about 30 to 1,300 ft. elev.	Mar–May	**Low.** Marginally suitable habitat present. Known occurrence within 3 miles of the project.
Chenopodium littoreum Coastal goosefoot	Fed: none Calif: 1B.2	Annual herb; generally found on sandy soils or sand dunes; below 130 ft. elev.	Apr–Aug	**Low.** Minimally suitable habitat present. Known within 3 miles of the project.
Deinandra paniculata Paniculate tarplant	Fed: none Calif: 4.2	Annual; vernally mesic areas in coastal scrub, native grasslands, and vernal pools. Scattered locations throughout much of cismontane central and southern California from about 80 to 3,100 ft. elev.	Apr–Nov	**Low.** Marginally suitable grassland habitat present. Known within 3 miles of the project.
Layia jonesii Jones' layia	Fed: none Calif: 1B.2	Annual; clay or serpentine substrates in chaparral and native grasslands. San Luis Obispo County from about 20 to 1,300 ft. elev.	Mar–May	**Low.** No clay or serpentine substrates observed. Minimally suitable grassland habitat present. Known occurrence within 1 mile of project.
Pinus radiata Monterey pine	Fed: none Calf: 1B.1	Evergreen tree; closed-cone coniferous forest and cismontane woodland. San Mateo County south to San Luis Obispo County, from about 80 to 600 ft. elev.	N/A	**Present.** Single sapling observed, appears to an escaped ornamental. NOTE: occurrence is outside of the known native range of the species.
Sanicula maritima Adobe sanicle	Fed: none Calf: 1B.1	Perennial herb; coastal prairie, chaparral, valley grassland, and wetland/riparian areas; Monterey and San Luis Obispo Counties around 500 ft. elev.	Feb–May	**Low.** Marginally suitable riparian habitat present. Known within 5 miles of the project.
Senecio aphanactis Chaparral ragwort	Fed: none Calif: 2B.2	Annual herb; alkaline flats and dry open rocky areas; Central Western California, South Coast, Channel Islands, and Baja California from 32 to 1,800 ft. elev.	Jan–Apr	**Low.** Minimally suitable habitat present. Known within 2 miles of the project.

Conservation Status

California Rare Plant Rank designations. Note: According to the California Native Plant Society (http://www.cnps.org/cnps/rareplants/ranking.php), plants ranked as CRPR 1A, 1B, and 2 meet definitions as threatened or endangered and are eligible for state listing. That interpretation of the state Endangered Species Act is not in general use.

1B: Plants rare and endangered in California and throughout their range.
2B: Plants rare, threatened or endangered in California but more common elsewhere in their range.
4: Plants of limited distribution; a watch list.

California Rare Plant Rank Threat designation extensions:

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

Sensitive Wildlife Species

There are currently 29 special-status wildlife species that have been documented on or within the general region of the project. Each of the species was assessed for its potential to occur within the project sites based on the following criteria:

- *Present*: Special-status wildlife (or sign) was observed in the project sites or in the same watershed (aquatic species only) during the most recent surveys, or a population has been acknowledged by CDFW, USFWS, or local experts.
- *High*: Habitat for the species occurs within the project and a known occurrence occurs within the project or adjacent areas (within 5 miles) within the past 20 years; however, these taxa were not detected during the most recent surveys.
- *Moderate*: Habitat for the species occurs within the project and a known regional record occurs within the database search, but not within 5 miles of the project or within the past 20 years; or the species' range includes the geographic area and suitable habitat exists.
- *Low*: Limited habitat for the species occurs within the project and no known occurrences were found within the database search and the species' range includes the geographic area.

Fifteen species were identified during the literature review as having a low, moderate, or high potential to occur during the proposed project schedule (i.e., dry season) based on existing recorded occurrences, known geographic range, or the presence of suitable habitat. Table 2 summarizes these 15 special-status wildlife species and those with a moderate or higher potential to occur in the project sites are discussed below in greater detail.

Table 2. Sensitive Wildlife Evaluated for Potential Occurrence

Species				
Scientific Name	**Common Name**	**Status**	**Habitat Type**	**Occurrence Potential**
Fish				
Oncorhynchus mykiss	Steelhead – South-central California coast Distinct Population Segment (DPS)	Fed: threatened Calif: Species of Special Concern (CSC)	Federal listing refers to runs in coastal basins from the Pajaro River south to Arroyo Grande Creek. Anadromous adults migrate upstream to spawn in cool, clear, well-oxygenated streams.	**High.** Morro Creek within the RW-V-523-13 site provides suitable habitat when water is present, but work is proposed during dry conditions when no aquatic habitat will be present. The RW-V-518-13N and RW-V-518-13S sites are not likely to provide suitable habitat for the species.

Table 2. Sensitive Wildlife Evaluated for Potential Occurrence

Species				
Scientific Name	**Common Name**	**Status**	**Habitat Type**	**Occurrence Potential**
Amphibians				
Rana draytonii	California red-legged frog	Fed: THR Calif: CSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation; requires 11-20 weeks of permanent water for larval development; must have access to aestivation habitat.	**Moderate.** The project sites provide suitable upland riparian habitat, but suitable aquatic habitat is limited.
Taricha torosa torosa	Coast Range newt	Fed: none Calif: CSC	Historically distributed in coastal drainages from central Mendocino County in the North Coast Ranges, south to Boulder Creek, San Diego County. Breeds in ponds, reservoirs, streams; terrestrial individuals occupy various adjacent upland habitats, including grasslands, woodlands, and forests.	**Low.** Headwaters of Morro Creek likely provide suitable year-round habitat, yet suitable aquatic habitat is limited at the project sites.
Reptiles				
Emys marmorata	Western pond turtle	Fed: none Calif: CSC	Inhabits permanent or nearly permanent bodies of water in various habitat types; requires basking sites such as partially submerged logs, vegetation mats, or open mud banks.	**Low.** Suitable aquatic habitat is not present at the project sites.
Phrynosoma blainvillii	Coast horned lizard	Fed: none Calif: CSC	A variety of habitats, including coastal sage scrub, chaparral, oak woodland, riparian woodland, and coniferous forest. Friable, sandy soils in areas with an abundant prey base of native ants are key habitat components.	**Low.** Suitable habitat is not present.
Birds				
Athene cunicularia (burrowing sites & some wintering sites)	Burrowing owl	Fed: none Calif: CSC	Open, dry perennial or annual grasslands, deserts, and scrublands characterized by low-growing vegetation; subterranean nester, dependent upon burrowing mammals, particularly California ground squirrels.	**Low.** The project provides no suitable burrowing habitat, yet does provide limited foraging habitat.
Circus cyaneus (nesting)	Northern harrier	Fed: none Calif: CSC	Prefer open country, grasslands, steppes, wetlands, meadows, agriculture fields; roost and nest on ground in shrubby vegetation often at edge of marshes.	**Low.** Marginal nesting and foraging habitat present.
Elanus leucurus (nesting)	White-tailed kite	Fed: none Calif: Fully Protected	Typically nests at lower elevations in riparian trees, including oaks, willows, and cottonwoods; forages over open country.	**Moderate.** The project sites provide suitable nesting and foraging habitat.

Table 2. Sensitive Wildlife Evaluated for Potential Occurrence

Species				
Scientific Name	**Common Name**	**Status**	**Habitat Type**	**Occurrence Potential**
Lanius ludovicianus (nesting)	Loggerhead shrike	Fed: none Calif: CSC	Resident in open woodland, grassland, savannah and scrub. Prefers open areas with sparse shrubs, trees, posts, and other suitable perches for foraging. Preys upon large insects and small vertebrates. Nests are well-concealed above ground in densely foliaged shrub or tree.	**Moderate.** Suitable nesting and foraging habitat present.
Vireo bellii pusillus (nesting)	Least Bell's vireo	Fed: Endangered Calif: Endangered	Summer resident of southern California in low riparian habitats in vicinity of water or dry river bottoms; found below 2000 ft.; nests placed along margins of bushes or on twigs projecting into pathways, usually willow, mesquite, baccharis species.	**Low.** Suitable nesting and foraging habitat present. The project is near the edge of this species' geographic range.
Mammals				
Corynorhinus townsendii	Townsend's big-eared bat	Fed: none Calif: CSC	Coastal conifer and broadleaved forests, oak and conifer woodlands, arid grasslands and deserts, and high-elevation forests and meadows. Primarily roosts in caves and abandoned mines, but may roost in buildings, bridges, rock crevices, and hollow trees in many habitat types.	**Low.** Minimal suitable roosting and foraging habitat present.
Eumops perotis californicus	Western mastiff bat	Fed: none Calif: CSC	Many open, semi-arid to arid habitats, including coniferous and deciduous woodland, coastal scrub, grassland, chaparral; roosts in crevices in cliff faces, high buildings, trees, tunnels.	**Low.** Minimal suitable roosting and foraging habitat present.
Neotoma lepida intermiedia	San Diego desert woodrat	Fed: none Calif: CSC	Coastal scrub; prefers moderate to dense canopies; particularly abundant in rock outcrops, rocky cliffs, and slopes.	**Low.** Minimal suitable present.
Nyctinomops macrotis	Big free-tailed bat	Fed: none Calif: CSC	Roosts in crevices of rocky cliffs, scattered localities in western North America through Central America; ranges widely from roost sites; variety of habitats; often forages over water.	**Low.** No suitable roosting habitat present, limited foraging habitat present.
Taxidea taxus	American badger	Fed: none Calif: CSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats with friable soils; require sufficient food source, friable soils, and open, uncultivated ground; prey on burrowing rodents.	**Low.** Marginally suitable habitat present.

South-Central California Coast Steelhead and Federally Designated Critical Habitat

Steelhead (*Oncorhynchus mykiss*) are known to seasonally occupy Morro Creek. There is a potential for this species to be present within RW-V-523-13 site when surface flows are present, though there is no potential for the species to occur in the project sites during the proposed project schedule (i.e., dry season when water is absent from the project sites).

No suitable steelhead habitat is present at the RW-V-518-13N and RW-V-518-13S. According to a draft CDFW bulletin called "History and Status of Steelhead in California Coastal Drainages South of San Francisco Bay" (as cited in SWCA 2014b), Little Morro Creek was deemed unsuitable as steelhead habitat because of extremely low and unstable flow, and a lack of spawning gravel. In the 2014 SWCA Technical Assistance Report for steelhead, which was submitted to the National Marine Fisheries Service (NMFS), Little Morro Creek was dry at the time of survey in August 2013 and contained highly silted bed and bank structure with dense willows surrounded by open agricultural fields. The creek channel at this location may provide migration habitat or low-quality rearing habitat during wet months, but likely dries out quickly after seasonal rains have ended.

Federally designated critical habitat for South-central California coast steelhead has been designated in Morro Creek within the RW-V-523-13 site. Critical habitat for this species includes stream channels within the designated stream reaches, and includes a lateral extent as defined by the ordinary high water mark, or top-of-bank where an ordinary high water line is not defined. Within these areas, the primary constituent elements essential for the conservation of South-central California coast steelhead are those sites and habitat components that support one or more life stages, including freshwater spawning sites, freshwater rearing sites, freshwater migration corridors, and estuarine areas. During the wet season when water is present in Morro Creek, the project site may provide freshwater migration corridors, spawning sites, or rearing sites. However, during dry periods such as those when the project is proposed, primary constituent elements (particularly water quantity and quality) are absent from the project site.

PG&E submitted two Technical Assistance Reports for the project to NMFS describing the proposed action and environmental setting, and evaluating the potential effects and avoidance and minimization measures (SWCA 2014a, b). NMFS agreed with the assessment that the project activities are not likely to appreciably reduce or alter the functional value of the aquatic habitat or detrimentally impact steelhead (NMFS 2015).

California red-legged frog and Federally Designated Critical Habitat

California red-legged frog (*Rana draytonii*) is known to occupy riparian and wetland habitat at several locations within Morro Creek, particularly in the lower portion of the drainage where slow or still water is prevalent after other portions of the creek (e.g., the RW-V-523-13 project site) have dried up. While it is possible that California red-legged frogs could occur in the project sites, suitable breeding habitat is not present, and the species is only likely to utilize the sites for migration, dispersal, or upland shelter.

All three project sites are within federally designated critical habitat for California red-legged frog. The primary constituent elements of the critical habitat include aquatic breeding habitat, standing bodies of fresh water, upland habitats, and dispersal habitats. The project sites support upland and dispersal habitat for California red-legged frog.

PG&E submitted two Technical Assistance Reports for the project to USFWS describing the proposed action and environmental setting and evaluating the potential effects and avoidance and minimization measures (SWCA 2014c, 2014d). USFWS concluded that PG&E is making a reasonable attempt to avoid the take of California red-legged frog through the implementation of avoidance and minimization measures (USFWS 2014a, 2014b).

White-tailed kite

The white-tailed kite (*Elanus leucurus*) is designated as a fully protected species by CDFW. It is a permanent resident of California and lives in a variety of cismontane habitats, especially coastal and valley lowlands, typically near agricultural areas. It typically nests and roosts in trees with dense canopies and grassy understories. It primarily feeds on voles and other small mammals, but will also

take birds, insects, reptiles, and amphibians. There are no known records of this species at the project work sites, though suitable nesting and foraging habitat are present near the project sites.

Loggerhead shrike

Loggerhead shrike (*Lanius ludovicianus*) is designated as a species of special concern by CDFW. It is a widespread species in the United States and throughout California. It prefers open habitats with scattered shrubs, trees, posts, fences, utility lines, or other perches. It most often occurs in open-canopied forest and woodland habitats. It nests in well-concealed microsites in densely foliaged trees or shrubs. There are no known records of this species at the project sites, though suitable nesting and foraging habitat are present near the project sites.

Other Migratory Nesting Birds

The federal Migratory Bird Treaty Act (MBTA) and the Convention for the Protection of Migratory Birds and Animals, agreements between the United States and Canada and the United States and Mexico, respectively, afford protection for migratory birds by making it unlawful to collect, sell, pursue, hunt, or kill native migratory birds, their eggs, nests, or any parts thereof. Certain game birds have been omitted from this protection. The laws were adopted to eliminate the commercial market for migratory bird feathers and parts, especially those of larger raptors and other birds of prey.

The riparian habitat at the project sites provides suitable nesting and foraging opportunities for birds, and it is possible that migratory and resident birds could nest and forage near or within the project sites during the proposed project.

Impacts.

Sensitive Habitats

The project includes removal of vegetation within three waterways and adjacent riparian areas. As previously noted, PG&E has submitted a Notification for Lake or Streambed Alteration to CDFW for vegetation removal associated with the RW-V-523-13 site and has received an Agreement from CDFW for RW-V-518-13N and RW-V-518-13S sites. PG&E has entered into a Habitat Restoration and Enhancement Agreement with the Upper Salinas Las Tablas Resource Conservation District to provide for off-site compensatory mitigation for the RW-V-523-13, RW-V-518-13N, and RW-V-518-13S sites. PG&E and CDFW agreed that the partnership with Upper Salinas Las Tablas Resource Conservation District offered the best mitigation option for impacts associated with vegetation removal. The habitat restoration project is located along Santa Rosa Creek, northern San Luis Obispo County, with the goal of enhancing the functions and characteristics to support steelhead populations in Santa Rosa Creek. PG&E is supporting the riparian tree and shrub planting component of the restoration project.

CDFW approved the restoration plan for RW-V-518-13N and RW-V-518-13S sites on December 13, 2017. The plan also includes tree planting for RW-V-523-13, but CDFW has not approved that part of the plan pending completion of the CEQA process. Implementation of the plan would result in the planting of 172 riparian trees within Santa Rosa Creek to mitigate for the loss of removed trees. With implementation of the restoration plan, impacts to riparian habitat would be less than significant.

Indirect effects from the introduction or spread of invasive weeds would be minimized by implementation of standard construction practices, which require the work sites, access routes, and staging areas to be surveyed for invasive plants by a qualified biologist, and infested areas would be clearly identified. Work in infested areas would include standard construction practices such as cleaning project equipment before moving into work sites and before moving out of infested areas, avoiding infested areas or working in them last, and avoiding creation of soil conditions favorable to the establishment of weeds. With implementation of the standard construction practices, impacts to riparian habitat or arroyo willow habitat would be less than significant.

The project includes removal of vegetation within three waterways. All vegetation within these drainages would be removed by hand and access would be on foot. No discharge of dredge or fill material is

anticipated within United State Army Corps of Engineers regulatory jurisdiction and, therefore, the project would not be subject to Section 404 or 401 permitting under the CWA. No impact would occur.

Sensitive Plant Species

No natural occurrences of special-status plants were observed during field surveys, though seasonally-timed botanical surveys were not conducted as part of this analysis. However, potential for occurrence of any rare plant species within the project sites was determined to be low due to limited habitat suitability. If sensitive plant species are present, inadvertent impacts could occur during vegetation maintenance activities while removing woody vegetation. Herbaceous vegetation would not be removed during this time. Since most of the sensitive species that have any potential to occur in the area are non-woody, herbaceous plants, direct removal of the species is unlikely. With implementation of standard construction practices and BIO Mitigation Measure 1 (BIO/mm-1; Special-Status Species Pre-Activity Surveys) any impacts to special-status plants would be less than significant.

Sensitive Wildlife Species

South-Central California Coast Steelhead and Federally Designated Critical Habitat.

The project would be conducted during the dry season, and no activities would occur when surface water is present. Standard construction practices include BMPs for sediment and erosion control and prohibit chipped or lopped vegetation from being broadcast into the watercourse. Because the project would not occur during times when steelhead could be present, and would not substantially alter the creek, no impacts to steelhead or designated critical habitat would occur.

California Red-legged Frog and Federally Designated Critical Habitat.

The project would include temporary disturbance to designated critical habitat, including potential upland and dispersal habitat for California red-legged frog. Potential direct impacts could occur if California red-legged frog individuals were to enter project sites, staging areas, or access routes during project activities. Other effects could include California red-legged frog being trampled, entombed in burrows, killed or injured by project equipment or worker foot-traffic, or harassed by noise or vibration associated with project activities. Standard construction practices include prohibitions on trash dumping, open fires, and pets within the project sites which would further minimize potential for direct impacts. Potential indirect impacts from degradation of water quality downstream of the project resulting from sedimentation would not occur because PG&E would implement standard BMPs for sediment and erosion control and prohibit chipped or lopped vegetation from being broadcast into the watercourse.

The project would not cause any direct or indirect impacts to California red-legged frog aquatic breeding habitat, as none is present within project sites. In addition, the project would not include any direct or indirect impacts to non-breeding aquatic habitat because the proposed activities would not alter existing hydrology at the crossing, and activities would not occur when surface water is present. The project would include removal of riparian vegetation in upland and dispersal habitat that may provide upland shelter and dispersal opportunities for the species. However, the amount of vegetation to be removed (approximately 0.45 acres of impact area within California red-legged frog critical habitat) is not likely to impact the survival of the species, as hundreds of acres of suitable upland shelter and dispersal habitat are present in the vicinity of the project and will remain undisturbed by project activities.

As noted in Section 2, Project Description, with the adoption of standard construction practices, BIO/mm-1 (Special-Status Species Pre-Activity Surveys), BIO Mitigation Measure 2 (BIO/mm-2; Biological Monitoring), and BIO Mitigation Measure 3 (BIO/mm-3; Herbicide Use), impacts to California red-legged frogs would be less than significant. The project would be conducted when surface water is absent. Pre-activity surveys for California red-legged frog within drainages and adjacent cover (BIO/mm-1) and fulltime biological monitoring (BIO/mm-2) will be conducted to ensure project activities do not impact this species. Standard construction practices require all project work to occur during daylight hours so that any wildlife including potential California red-legged frogs occurring within work sites, staging areas, and access routes can be easily identified and avoided. Further, standard

construction practices require that no herbicides (including aquatic-approved) shall be used within a wetland, stream, or other waterway. Under BIO/mm-3, herbicide treatment performed near wetland, streams, or waterways would also be performed in accordance with the 2006 Final Stipulated Injunction and Related Information Involving Pesticides and the California Red-legged Frog (U.S. Environmental Protection Agency 2007) to avoid detrimental herbicide impacts to California red-legged frog.

Special-Status Birds.

White-tailed kite and loggerhead shrike are special-status birds that may nest and/or forage in the project sites. The project could directly impact potential nesting and foraging habitat for these species through vegetation removal. However, the amount of vegetation to be removed (approximately 0.45 acres of impact area) would not adversely impact the survival of any special-status species, as hundreds of acres of suitable nesting and foraging habitat are present near the project and will remain undisturbed by project activities.

Potential indirect impacts could include nest abandonment and disruption of foraging via disturbance from noise or human presence. Birds may temporarily avoid the project site while workers are present, but the small footprint of the project and the short duration of activities, combined with the relatively minor impact of using hand tools for the vegetation removal, would not significantly disrupt nesting in the general area or substantially displace breeding or foraging birds. Further, BIO Mitigation Measure 4 (BIO/mm-4) requires nest surveys and nest avoidance buffers to be implemented to avoid impacts to nesting birds.

Project impacts to special-status birds would be less than significant with implementation of standard construction practices and BIO/mm-4, including pre-activity nesting bird surveys and implementation of no-work exclusion buffers for any active nests identified during nesting bird surveys.

Nesting Migratory Passerine Birds and Raptors.

Project activities would be conducted within the nesting season for many passerine and raptor species. Potential direct impacts to nesting birds could occur via removal of nest trees or shrubs. Potential indirect impacts could include nest abandonment via disturbance from noise or human presence. However, BIO/mm-4 requires nest surveys and nest avoidance buffers to be implemented to avoid impacts to nesting birds. Birds may temporarily avoid the project sites while workers are present, but the small footprint of the project and the short duration of activities, combined with the relatively minor impact of using hand tools for the vegetation removal, would not significantly disrupt nesting in the general area or substantially displace breeding or foraging birds. With implementation of standard construction practices as well as BIO/mm-4, including pre-activity nesting bird surveys and avoidance of active nests, impacts to nesting birds would be less than significant.

Wildlife Corridors/Nursey Sites

The project does not include any features that would interfere substantially with wildlife movement from one area to another. The project is located in riparian corridors with little adjacent development. The project sites are near potential migration habitat for California red-legged frog and steelhead but removing vegetation around the existing pipeline would not impede access through the creek or adjacent upland habitat. Work would be conducted during the dry season when these species are not expected to be present or dispersing to and from breeding sites. Wildlife may temporarily avoid the project sites while workers are present, but the small footprint of the project and the short duration of activities, combined with the relatively minor impact of using hand tools for the vegetation removal, would not significantly impede wildlife movement or substantially displace wildlife from nursery sites. Impacts to wildlife movement would be less than significant because project activities would occur at the site only for a period of approximately 1 - 2 days to 1 week and barriers to migration and movement would be temporary. Under BIO/mm-2, a biologist would be present during all project activities to inspect project sites and surrounding areas to ensure the impacts to wildlife species are avoided and minimized to the extent possible. With implementation of standard construction practices, and BIO/mm-2, impact

to wildlife movement would be less than significant.

Mitigation/Conclusion. Mitigation measures are proposed to avoid and minimize potential project-related impacts to sensitive biological resources.

In addition to any additional mitigation measures required by applicable agency permits, the applicant shall implement the following:

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

BIO/mm-1 *A qualified biologist shall conduct pre-activity surveys for special status species within 30 days before start of work and immediately before the start of each day's project activities.*

a. *The survey area shall include the project sites, staging areas, and access routes and within a 1,000 foot radius of the project sites and staging areas at the RW-V-523-13 and RW-V-518S sites. A 200-foot buffer shall be sufficient for the RW-V-518N site. If the 200 or 1,000-foot radius is not within the existing right-of-way or not otherwise accessible, this distance may be reduced. However, the biologist shall visually survey at least 1,000 feet (or 200 feet) using binoculars, spotting scopes and other visual surveying equipment.*

b. *If water is present within the project sites, staging areas, and the 1,000-foot buffers at the RW-V-523-13 and RW-V-518S sites, work shall be suspended in those areas until the area is dry, at which time another pre-activity survey shall be conducted as described above.*

c. *If any special-status species are observed during the pre-activity survey, work shall be delayed in the immediate project site and the qualified biologist shall contact the County to determine if additional measures are required.*

BIO/mm-2 *A qualified biologist shall be present during all project activities to inspect project sites and surrounding areas to ensure the impacts to wildlife species are avoided and minimized to the extent possible.*

BIO/mm-3 *Any herbicide treatment performed near wetland, streams, or waterways would also be performed in accordance with the 2006 Final Stipulated Injunction and Related Information Involving Pesticides and the California Red-legged Frog (U.S. Environmental Protection Agency 2007) to avoid detrimental herbicide impacts to California red-legged frog.*

BIO/mm-4 *If work is scheduled to take place from March 1 through August 31, a pre-activity nesting bird survey shall be conducted by a qualified biologist within 30 days and again within 14 days of mobilization, covering a radius of 250 feet for non-raptors and 500 feet for raptors. If any active nests are observed, the nests and trees shall be protected with a minimum 250- or 500-foot buffer (for non-raptors and raptors, respectively) until young have fledged and are no longer reliant on the nest site or parental care. These buffers may be adjusted upon consultation between CDFW and a PG&E biologist.*

BIO/mm-5 *Prior to any tree removal, all applicable agency permits with jurisdiction over the project area (i.e., CDFW, RWQCB) shall be obtained, as necessary. All additional mitigation measures required by these agencies shall be implemented as necessary throughout the project.*

BIO/mm-6 *Prior to any tree removal, the applicant shall provide confirmation that they have entered into a Habitat Restoration and Enhancement Agreement with the Upper Salinas Las Tablas Resource Conservation District to provide for off-site compensatory mitigation for RW_V_523_13, 518N and 518S by planting 172 riparian trees.*

5. CULTURAL RESOURCES *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) *Disturb archaeological resources?*	☐	☒	☐	☐
b) *Disturb historical resources?*	☐	☐	☒	☐
c) *Disturb paleontological resources?*	☐	☐	☒	☐
d) *Cause a substantial adverse change to a Tribal Cultural Resource?*	☐	☐	☒	☐
e) *Other:* _____	☐	☐	☒	☐

Cultural Resources

Setting.

The project is located in an area historically occupied by the Salinana/Chumash . No historic structures are present and no paleontological resources are known to exist in the area.

In July, 2015, the legislature added the new requirements to the CEQA process regarding tribal cultural resources in Assembly Bill 52 (Gatto, 2014). By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process.

In order to meet AB52 Cultural Resources requirements, outreach to four Native American tribal groups has been conducted (Salinan Tribe of Monterey & San Luis Obispo Counties, Xolon Salinan, Yak Tityu Tityu Northern Chumash, and the Northern Chumash Tribal Council). Letters requesting information concerning cultural resources in the area were sent to each of the tribal contacts identified by the Native American Heritage Commission (NAHC) on July 11, 2017. No comments were received in response to these letters.

Impact. The project is not located in a designated Archaeologically Sensitive combining designation area. However culturally sensitive and archaeological resources are known to exist in the region, and the project is located in an area that would be considered culturally sensitive due to its proximity to Morro Creek and Little Morro Creek. Aspen Environmental Group conducted a cultural records search and site visit of the RW-V-523-13 project site in December 2016 – January 2017. The study was conducted by a qualified archaeologist consistent with County guidelines and includes a cultural resources records search, a site visit, and the preparation of a technical report documenting the results of the assessment which includes management recommendations. A records search from the Central Coast Information Center (CCIC), located at the University of California, Santa Barbara revealed that no cultural resources have been recorded within ¼ mile of the proposed RW-V-523-13 project area. Two (2) previously conducted cultural resources surveys included portions of the RW-V-523-13 project area, and an additional three (3) surveys were conducted in areas within a ¼-mile radius of the project

area. All five (5) previous cultural resources reports indicated an absence of cultural resources within the surveyed areas. Aspen Environmental Group conducted pedestrian surveys of the RW-V-523-13 project site in December 2016 and identified one prehistoric site (Aspen 3263-001) at the southeastern edge of the project area. The site is not located within an area that would be exposed to vegetation removal, cutting, or other disturbance; therefore, no direct impacts would occur.

No known California Register of Historical Resources (CRHR) eligible or listed archaeological resources, significant paleontological resources, Tribal Cultural Resources, or CRHR historic buildings or structures are within proposed disturbance areas (which would be entirely within riparian habitat above ground surface). As no subsurface excavations or access route modifications are planned for the project, impacts to prehistoric and/or historic archaeological resources are not anticipated. However, in an abundance of caution and due to the sensitivity of the area for cultural resources and the known presence of prehistoric resources in close proximity to the project area, archaeological monitoring during vegetation removal would be required. With implementation of identified mitigation, , impacts to cultural resource would be reduced to less than significant.

Mitigation/Conclusion. The project area is highly sensitive for archaeological resources and resources are known to exist in areas immediately adjacent to proposed vegetation removal. Although the project would not result in any ground disturbance, archaeological monitoring would be required to ensure no potentially significant indirect impacts to sensitive resources would occur. The County's Coastal Zone Land Use Ordinance (CZLUO) Section 23.05.150 has standards for archeological resources discovery during construction activities that would further mitigate potential effects related to unanticipated discovery of resources.

Mitigation measures are proposed to avoid and minimize potential project-related impacts to sensitive archaeological resources. Compliance with existing County ordinances and implementation of CR/mm-1 and CR/mm-2 would reduce potential impacts to less than significant.

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

CR/mm-1 *Prior to project implementation, the Applicant shall prepare an Archaeological Monitoring Plan (AMP). The AMP shall include (but not be limited to) the following:*

a. *A list of personnel involved in the monitoring activities;*

b. *Description of Native American involvement;*

c. *Description of how the monitoring shall occur;*

d. *Description of frequency of monitoring (e.g., full time, part time, spot checking);*

e. *Description of what resources are expected to be encountered;*

f. *Description of circumstances that would result in the halting of work at the project site;*

g. *Description of procedures for halting work on the site and notification procedures;*

h. *Description of monitoring reporting procedures; and,*

i. *Provide specific, detailed protocols for what to do in the event of the discovery of human remains.*

CR/mm-2 *An archaeological and Native American monitor shall be present during project related ground disturbing activities that have the potential to encounter previously unidentified*

archaeological resources, as outlined in the AMP prepared to satisfy CR/mm-1. Archaeological monitoring may cease at any time if the County-qualified archaeologist, in coordination with project's Environmental Coordinator, determine that project activities do not have the potential to encounter and/or disturb unknown resources.

6. GEOLOGY AND SOILS *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Result in exposure to or production of unstable earth conditions, such as landslides, earthquakes, liquefaction, ground failure, land subsidence or other similar hazards?	☐	☐	☒	☐
b) Be within a California Geological Survey "Alquist-Priolo" Earthquake Fault Zone", or other known fault zones*?	☐	☐	☐	☒
c) Result in soil erosion, topographic changes, loss of topsoil or unstable soil conditions from project-related improvements, such as vegetation removal, grading, excavation, or fill?	☐	☐	☒	☐
d) Include structures located on expansive soils?	☐	☐	☒	☐
e) Be inconsistent with the goals and policies of the County's Safety Element relating to Geologic and Seismic Hazards?	☐	☐	☐	☒
f) Preclude the future extraction of valuable mineral resources?	☐	☐	☐	☒
g) Other: _____	☐	☐	☐	☒

* **Per Division of Mines and Geology Special Publication #42**

Setting. The following relates to the project's geologic aspects or conditions:

Topography: Nearly level to moderately steep

Within County's Geologic Study Area?: Yes

Landslide Risk Potential: High: APN 073-085-027

Low: APNs 073-051-059 and 073- 084-013

Liquefaction Potential: Moderate: APNS 073-051-059 AND 073-084-013

Low: APN 073-085-027

Nearby potentially active faults?: Mapped Potentially Capable Fault Distance? Less than 0.5 mile

Area known to contain serpentine or ultramafic rock or soils?: Yes

Shrink/Swell potential of soil: Low to moderate

Other notable geologic features? None

Geology and Soils

The proposed project is not located within a *California Geological Survey "Alquist-Priolo"* fault zone (County of San Luis Obispo 2018a). The topography of the proposed project area is considered nearly level to moderately steep and the project is located within a County Geological Study area. The project proposes limited removal of vegetation within existing gas pipeline ROWs. The project does not propose any development and no grading or ground disturbing activities would be required. All work would occur under naturally dry conditions with no stream flow present within the sites (typically June 15 to November 1). Per standard company protocols, PG&E would prepare an A-ESCP for sediment and erosion control and to prevent runoff, if necessary. Furthermore, PG&E would also implement a project worker environmental awareness program that would address potential environmental issues and appropriate work practices specific to this project, including proper implementation of BMPs. Based on the limited nature of project activities and implementation of standard BMPs, potential impacts to geology and soils would be less than significant.

Mitigation/Conclusion. No significant geology and soils impacts would occur, and no mitigation measures are necessary.

7. HAZARDS & HAZARDOUS MATERIALS - ***Will the project:***	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on, or adjacent to, a site which is included on a list of hazardous material/waste sites compiled pursuant to Gov't Code 65962.5 ("Cortese List"), and result in an adverse public health condition?	☐	☐	☐	☒
e) Impair implementation or physically interfere with an adopted emergency response or evacuation plan?	☐	☐	☐	☒

7. HAZARDS & HAZARDOUS MATERIALS - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
f) If within the Airport Review designation, or near a private airstrip, result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Increase fire hazard risk or expose people or structures to high wildland fire hazard conditions?	☐	☐	☒	☐
h) Be within a 'very high' fire hazard severity zone?	☐	☐	☒	☐
i) Be within an area classified as a 'state responsibility' area as defined by CalFire?	☐	☐	☒	☐
j) Other: _____	☐	☐	☐	☒

Hazards and Hazardous Materials

Setting. The proposed project is located in rural San Luis Obispo County, and is not located in proximity to schools or hospitals. Onsite and surrounding land uses are limited to riparian habitat, agriculture, undeveloped open space, and scattered residences and agricultural support structures. The project is not located in an area of known hazardous material contamination. Based on a review of the State Water Resources Control Board's (SWRCB) Geotracker database and the California Department of Toxic Substance Control's EnviroStor database, there are no pending hazardous waste cleanup sites within the project site or immediately surrounding areas. The project is not within a "high" or "very high" severity risk area for fire, but is within a State/CalFire responsibility area. Emergency response times at the project sites are between 0 and 10 minutes. The project is not within an Airport Review area or within 2 miles of any public or private airport.

Impact. The project does not propose the routine use of hazardous materials, nor the generation of hazardous wastes. The proposed project is not located on a site that is included on a list of hazardous materials sites (the "Cortese List") (California Environmental Protection Agency 2018). The project would not substantially affect traffic or circulation patterns and would not conflict with any regional emergency response or evacuation plan. Implementation of the project would require the use of equipment within rural vegetated areas that are susceptible to wildland fires. Heat or sparks from vehicles or equipment have the potential to ignite dry vegetation and cause a fire. Mechanical equipment would also require the use of oils, gasoline, lubricants, fuels, and other potentially hazardous substances in sensitive riparian areas during vegetation removal. Such use would be short-term (up to 1 week) and subject to standard requirements for the handling of hazardous materials. Per standard company protocols, PG&E would also prepare a health and safety plan and hazardous substance control and emergency response plan for the project. PG&E would implement a worker environmental awareness program that would address spill prevention and response measures and proper implementation of BMPs. Crews would provide secondary containment for any hazardous materials. Compliance with these standard construction methods would ensure potential impacts related to accidental spills or fires in sensitive areas would be less than significant.

The project is not located within 0.25 mile of a school or 2 miles of a public or private airport; no impact to those facilities would occur. Therefore, the project would not create a significant hazard to the public

or a significant risk related to the release of hazardous materials, and potential impacts would be less than significant.

Mitigation/Conclusion. No significant impacts related to hazards or hazardous materials would occur, and no mitigation measures are necessary.

8. NOISE *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) ***Expose people to noise levels that exceed the County Noise Element thresholds?***	☐	☐	☒	☐
b) ***Generate permanent increases in the ambient noise levels in the project vicinity?***	☐	☐	☒	☐
c) ***Cause a temporary or periodic increase in ambient noise in the project vicinity?***	☐	☐	☒	☐
d) ***Expose people to severe noise or vibration?***	☐	☐	☐	☒
e) ***If located within the Airport Review designation or adjacent to a private airstrip, expose people residing or working in the project area to severe noise levels?***	☐	☐	☐	☒
f) ***Other:*** _____	☐	☐	☐	☒

Setting. The County has established noise standards in the Coastal Zone Land Use Ordinance (Title 23 of the County Code). Noise associated with construction is generally exempt from the County noise standards provided such activities do not take place before 7:00 a.m. or after 9:00 p.m. any day except Saturday or Sunday, or before 8:00 a.m. or after 5:00 p.m. on Saturday or Sunday (County of San Luis Obispo 2018b).

Impact. The term "sensitive receptors" refers to specific population groups, as well as the land uses where individuals would reside for long periods. Commonly identified sensitive land uses would include facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of noise. Residential dwellings, schools, parks, playgrounds, childcare centers, convalescent homes, and hospitals are examples of sensitive land uses. There are three dwelling units located adjacent to RW-V-523-13 and additional multiple residences north of SR-41 adjacent to the site. Potential noise impacts would occur from use of chainsaws, wood chippers, and other mechanical equipment during vegetation removal; however, vegetation management at this location would be limited to 1 week. Work would occur during daylight hours, beginning at least one-half hour after sunrise and ending at least one-half hour before sunset, Monday through Saturday. The proposed project would not expose persons to, or generate noise levels in excess of, standards established in the local general plan or noise ordinance; therefore, potential impacts would be less than significant.

Mitigation/Conclusion. No significant noise impacts would occur, and no mitigation measures are necessary.

9. POPULATION/HOUSING *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Induce substantial growth in an area either directly (e.g., construct new homes or businesses) or indirectly (e.g., extension of major infrastructure)?	☐	☐	☐	☒
b) Displace existing housing or people, requiring construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Create the need for substantial new housing in the area?	☐	☐	☐	☒
d) Other: _____	☐	☐	☐	☒

Setting. The project is located in rural unincorporated areas just east of the city of Morro Bay. In its efforts to provide for affordable housing, the county currently administers the Home Investment Partnerships (HOME) Program and the Community Development Block Grant (CDBG) program, which provides limited financing to projects relating to affordable housing throughout the county. The County's Inclusionary Housing Ordinance requires provision of new affordable housing in conjunction with both residential and nonresidential development and subdivisions.

Impact. The project proposes vegetation maintenance (e.g., removing trees and brush) within PG&E's existing ROW in three areas that contain high-pressure natural gas transmission pipelines. The project would not induce population growth or create the need for new housing in the area. The project would not displace existing housing or people.

Mitigation/Conclusion. No significant population and housing impacts would occur, and no mitigation measures are necessary.

10. PUBLIC SERVICES/UTILITIES *Will the project have an effect upon, or result in the need for new or altered public services in any of the following areas:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Fire protection?	☐	☐	☒	☐
b) Police protection (e.g., Sheriff, CHP)?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Roads?	☐	☐	☒	☐
e) Solid Wastes?	☐	☐	☒	☐
f) Other public facilities?	☐	☐	☐	☒

10. PUBLIC SERVICES/UTILITIES

Will the project have an effect upon, or result in the need for new or altered public services in any of the following areas:	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
g) Other: _____	☐	☐	☐	☒

Setting. The project area is served by the following public services/facilities:

Police: County Sheriff Location: Los Osos (Approximately 5 miles to the south

Fire: Cal Fire (formerly CDF) Hazard Severity: Moderate Response Time: 0-10 minutes

Location: Station 15, South Bay Fire Station, approximately 5 miles to the south

School District: San Luis Coastal Unified School District.

The County-adopted Public Facilities Fee Ordinance (Title 18) provides for the collection of a fair-share fee from new development to help mitigate for cumulative impacts on public facilities. This fee currently being collected helps fund capital improvement projects in the following areas: libraries, fire, general government, parks and recreation, and sheriff's patrol.

Emergency Services

Emergency services generally include ambulance and hospital service. Private companies based throughout the County provide ambulance service. Response times are generally within acceptable levels with the exception of the more rural portions of the County where the large area being served, and the distances involved lend to poorer levels of service. Hospital services are provided by French and Sierra-Vista hospitals in the City of San Luis Obispo.

Solid Waste Collection

The County currently has three permitted public landfill facilities that accept a variety of municipal solid waste: Cold Canyon, Chicago Grade, and Paso Robles. Solid waste generated by project development (construction trash) is expected to primarily go to Cold Canyon. Cold Canyon Landfill is located approximately 6 miles south of the City of San Luis Obispo on Highway 227. This landfill is under the jurisdiction of, and permitted by, the Cal Recycle (previously California Integrated Waste Management Board).

Impact. The proposed project may slightly increase demand on fire and police services during vegetation removal activities, but due to the limited nature and duration of proposed activities, potential effects would be negligible. The project would not generate population growth in the area and would have no impact on proximate schools. Increased construction-related traffic and demand on local public roadways would also be negligible due to the limited nature and duration of proposed activities. The project would not result in any long-term change in the generation of solid waste at the project site. However, the development of the project would generate solid waste during vegetation clearing (general construction trash and green waste). Removed vegetation would be hauled to a designated location to be chipped. The Cold Canyon Landfill is currently operating at approximately 60 percent capacity (Cal Recycle 2018).

Mitigation/Conclusion. No significant impacts to public services/utilities would occur and no mitigation measures are necessary.

11. RECREATION

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Increase the use or demand for parks or other recreation opportunities?	☐	☐	☐	☒
b) Affect the access to trails, parks or other recreation opportunities?	☐	☐	☐	☒
c) Other _____	☐	☐	☐	☒

Setting. The County's Parks and Recreation Element does not show that a potential trail goes through the proposed project (County of San Luis Obispo 2006). The project is not proposed in a location that will affect any trail, park, recreational resource, coastal access, and/or Natural Area.

Impact. The proposed project would not induce population growth or increase demand on parks or recreational facilities. Vegetation maintenance activities in the proposed areas would not have any adverse effects on existing or planned recreational opportunities in the County. The proposed project would not create a significant need for additional park, natural area, and/or recreational resources.

Mitigation/Conclusion. No significant recreation impacts would occur, and no mitigation measures are necessary.

12. TRANSPORTATION/CIRCULATION

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Increase vehicle trips to local or areawide circulation system?	☐	☐	☒	☐
b) Reduce existing "Level of Service" on public roadway(s)?	☐	☐	☒	☐
c) Create unsafe conditions on public roadways (e.g., limited access, design features, sight distance, slow vehicles)?	☐	☐	☐	☒
d) Provide for adequate emergency access?	☐	☐	☐	☒
e) Conflict with an established measure of effectiveness for the performance of the circulation system considering all modes of transportation (e.g. LOS, mass transit, etc.)?	☐	☐	☒	☐
f) Conflict with an applicable congestion management program?	☐	☐	☐	☒
g) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

12. TRANSPORTATION/CIRCULATION *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
h) Result in a change in air traffic patterns that may result in substantial safety risks?	☐	☐	☐	☒
i) Other: _____	☐	☐	☐	☒

Setting. The County has established the acceptable Level of Service (LOS) on roads for this rural area as "C" or better. Work crews would use existing public roads, PG&E access roads, and other private access roads (given landowner permission) as necessary to access the project sites.

Impact. Short-term construction-related trips associated with proposed vegetation removal would be minimal and limited to a very short construction duration (1 week or less). After the main vegetation removal activities are complete, the proposed project would not generate consistent additional vehicle trips on the existing road network, though long-term maintenance activities would require additional trips (as needed) to maintain cleared areas. The increase in trips associated with initial vegetation removal and subsequent maintenance would be negligible. As a result, the proposed project would have no long-term impact on existing road levels of service, traffic safety levels, or emergency access. The project would not conflict with adopted policies, plans and programs related to transportation and would have no impact on alternative modes of transportation (bike and pedestrian facilities, public transit) or air traffic patterns.

Mitigation/Conclusion. No potentially significant impacts related to transportation and circulation would occur and no mitigation is necessary.

13. WASTEWATER *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Violate waste discharge requirements or Central Coast Basin Plan criteria for wastewater systems?	☐	☐	☐	☒
b) Change the quality of surface or ground water (e.g., nitrogen-loading, day-lighting)?	☐	☐	☐	☒
c) Adversely affect community wastewater service provider?	☐	☐	☐	☒
d) Other: _____	☐	☐	☐	☒

Setting. The project sites do not contain any wastewater facilities. Uses in the vicinity of the project sites are typically served by onsite septic systems.

Impact. The project does not propose the use or development of any on-site wastewater disposal systems or connection to any community wastewater system. The project would not include any use that would require wastewater discharges, except for short-term vegetation management activities. On-

site portable restroom and hand-washing facilities would be provided for short-term vegetation removal activities (if necessary) and disposed of at a licensed facility. There would be no long-term generation of wastewater. Therefore, impacts would be less than significant.

Mitigation/Conclusion. No significant wastewater impacts would occur, and no mitigation measures are necessary.

14. WATER & HYDROLOGY

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
QUALITY				
a) Violate any water quality standards?	☐	☐	☒	☐
b) Discharge into surface waters or otherwise alter surface water quality (e.g., turbidity, sediment, temperature, dissolved oxygen, etc.)?	☐	☐	☒	☐
c) Change the quality of groundwater (e.g., saltwater intrusion, nitrogen-loading, etc.)?	☐	☐	☐	☒
d) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff?	☐	☐	☐	☒
e) Change rates of soil absorption, or amount or direction of surface runoff?	☐	☐	☐	☒
f) Change the drainage patterns where substantial on- or off-site sedimentation/ erosion or flooding may occur?	☐	☐	☒	☐
g) Involve activities within the 100-year flood zone?	☐	☐	☒	☐
QUANTITY				
h) Change the quantity or movement of available surface or ground water?	☐	☐	☒	☐
i) Adversely affect community water service provider?	☐	☐	☐	☒
j) Expose people to a risk of loss, injury or death involving flooding (e.g., dam failure,etc.), or inundation by seiche, tsunami or mudflow?	☐	☐	☐	☒
k) Other: _____	☐	☐	☐	☒

Setting. RW-V-523-13 crosses Morro Creek, while RW-V-518-13N crosses a small, unnamed tributary

to Morro Creek and RW-V-518-13S crosses Little Morro Creek (also a tributary to Morro Creek). The project area is located in the Morro Bay sub-area of the Estero Bay hydrologic unit, which has a drainage area of 24 square miles and seven tributaries. Morro Creek discharges to the Pacific Ocean.

Impact. Potential water pollutants could be generated including soil sediment as a result of site disturbance and petroleum-based fuels or lubricants associated with equipment used during the project. All vegetation removal would be done using hand tools and accessed on foot. No dredge or fill activity is proposed within the stream crossing as part of the project activities. The project does not include any grading activities and all project activities would be conducted outside of the wet season. Therefore, potential impacts to surface water quality or quantity would be less than significant. The project would require minimal amounts of water for dust suppression (as needed) and other construction related activities but would not generate a long-term increase in water demand. The project would not substantially deplete groundwater supplies and does not include any actions that would affect groundwater recharge or quality.

Herbaceous vegetation would remain in all zones. The selective removal of trees and brush would not result in the creation of bare ground surface. No work would be conducted in wetted portions of the creek and no dewatering would be required. The proposed project would not alter the existing drainage patterns, alter the course of the waterways, or result in an increase in surface runoff that could result in on- or off-site flooding. Per standard company protocols, PG&E would prepare an A-ESCP, health and safety plan, and hazardous substance control and emergency response plan for the project. PG&E would also implement a project worker environmental awareness program that would address potential environmental issues and appropriate work practices specific to this project. This awareness training would include spill prevention and response measures, and proper implementation of BMPs. The training would emphasize site specific physical conditions to improve hazard prevention (such as identification of flow paths to nearest water bodies) and includes a review of all site-specific water quality requirements, including applicable portions of the A-ESCP, health and safety plan, and hazardous substance control and emergency response plan.

Implementation of these standard construction practices would ensure the project's water quality and hydrology impacts would be less than significant.

Mitigation/Conclusion. No significant impacts related to water quality and hydrology were identified, and no mitigation measures are necessary.

15. LAND USE

Will the project:

	Inconsistent	Potentially Inconsistent	Consistent	Not Applicable
a) Be potentially inconsistent with land use, policy/regulation (e.g., general plan [County Land Use Element and Ordinance], local coastal plan, specific plan, Clean Air Plan, etc.) adopted to avoid or mitigate for environmental effects?	☐	☐	☒	☐
b) Be potentially inconsistent with any habitat or community conservation plan?	☐	☐	☒	☐
c) Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project?	☐	☐	☒	☐
d) Be potentially incompatible with surrounding land uses?	☐	☐	☒	☐

15. LAND USE

Will the project:

	Inconsistent	Potentially Inconsistent	Consistent	Not Applicable
e) Other: _____	☐	☐	☐	☒

Land Use

Setting/Impact. Existing and surrounding land uses at the project sites include riparian habitat, agriculture, and scattered rural residences. The proposed project was reviewed for consistency with policy and/or regulatory documents relating to the environment and appropriate land use (e.g., County Coastal Zone Land Use Ordinance, General Plan, Local Coastal Plan, etc.). The project was found to be consistent with these documents (refer also to Exhibit A on reference documents used).

The project does not propose any new or modified land use in the project area. The project is not within or adjacent to a Habitat Conservation Plan area. The project is consistent or compatible with the existing use and surrounding uses.

Mitigation/Conclusion. No significant land use impacts or inconsistencies would occur and no mitigation measures are necessary.

16. MANDATORY FINDINGS OF SIGNIFICANCE

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or pre-history?	☐	☒	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	☐	☒	☐	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

The proposed project is a vegetation management project designed to improve public safety and access to existing gas pipelines. Implementation of the recommended mitigation measures would ensure that the project would not substantially degrade the quality of the environment, reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels or threaten to eliminate a plant or animal community, or substantially reduce the number of, or restrict the range of, a rare or endangered plant or animal. The proposed project would not contribute significantly to GHG emissions or significantly increase energy consumption and would not eliminate important examples of California history or prehistory.

The proposed project does not propose a new or significantly different use within the project site; therefore, the project would not result in a substantial change from existing conditions and impacts would be generally minimized through application of standard control measures. The project does not have impacts that would be individually limited but cumulatively considerable with implementation of identified mitigation. There are no proposed or planned projects in the area that would create similar impacts, which, when considered together with the project-related impacts, would be considerable, or which compound or increase other long-term environmental impacts.

The proposed project would not create environmental impacts that would cause substantial adverse effects on human beings, either directly or indirectly. The project would remove vegetation around existing gas pipelines, providing beneficial safety and access improvements to existing infrastructure. Adverse project effects would generally be limited to the construction phase of the project and minimized through identified mitigation measures and standard PG&E construction practices and BMPs. Potential impacts would be less than significant.

For further information on CEQA or the County's environmental review process, please visit the County's web site at "www.sloplanning.org" under "Environmental Information", or the California Environmental Resources Evaluation System at: http://resources.ca.gov/ceqa/ for information about the California Environmental Quality Act.

Exhibit A - Initial Study References and Agency Contacts

The County Planning Department has contacted various agencies for their comments on the proposed project. With respect to the subject application, the following have been contacted (marked with ☒) and when a response was made, it is either attached or in the application file:

Contacted	Agency	Response
☒	County Public Works Department	**In File****
☐	County Environmental Health Services	**Not Applicable**
☒	County Agricultural Commissioner's Office	**None**
☐	County Airport Manager	**Not Applicable**
☐	Airport Land Use Commission	**Not Applicable**
☐	Air Pollution Control District	**None**
☐	County Sheriff's Department	**Not Applicable**
☐	Regional Water Quality Control Board	**Not Applicable**
☒	CA Coastal Commission	**None**
☒	CA Department of Fish and Wildlife	**None**
☐	CA Department of Forestry (Cal Fire)	**Not Applicable**
☐	CA Department of Transportation	**None**
☐	Community Services District	**Not Applicable**
☒	Other U.S. Fish & Wildlife,	**None**
☒	Other City of Morro Bay	**None**

*** "No comment" or "No concerns"-type responses are usually not attached*

The following checked ("☒") reference materials have been used in the environmental review for the proposed project and are hereby incorporated by reference into the Initial Study. The following information is available at the County Planning and Building Department.

☒ Project File for the Subject Application

County documents

☒ Coastal Plan Policies
☒ Framework for Planning (Coastal/Inland)
☒ General Plan (Inland/Coastal), includes all maps/elements; more pertinent elements:
- ☒ Agriculture Element
- ☒ Conservation & Open Space Element
- ☐ Economic Element
- ☐ Housing Element
- ☒ Noise Element
- ☒ Parks & Recreation Element/Project List
- ☒ Safety Element

☒ Land Use Ordinance (Inland/Coastal)
☒ Building and Construction Ordinance
☐ Public Facilities Fee Ordinance
☐ Real Property Division Ordinance
☐ Affordable Housing Fund
☐ Airport Land Use Plan
☐ Energy Wise Plan
☒
☒ Estero Area Plan
and Update EIR

☐ Design Plan
☐ Specific Plan
☒ Annual Resource Summary Report
☐ Circulation Study

Other documents

☒ Clean Air Plan/SLOAPCD Handbook
☒ Regional Transportation Plan
☒ Uniform Fire Code
☒ Water Quality Control Plan (Central Coast Basin – Region 3)
☒ Archaeological Resources Map
☒ Area of Critical Concerns Map
☒ Special Biological Importance Map
☒ CA Natural Species Diversity Database
☒ Fire Hazard Severity Map
☒ Flood Hazard Maps
☒ Natural Resources Conservation Service Soil Survey for SLO County
☒ GIS mapping layers (e.g., habitat, streams, contours, etc.)
☐ Other

In addition, the following project specific information and/or reference materials have been considered as a part of the Initial Study:

Aspen Environmental Group. 2017. Biological Resources Technical Report for the PG&E Gas Transmission Pipeline 306 Vegetation Management Project. Prepared for the California Department of Fish and Wildlife.

Aspen Environmental Group. 2017. Cultural Resources Technical Report for the PG&E Gas Transmission Pipeline 306 Vegetation Management Project. Prepared for the California Department of Fish and Wildlife.

Cal Recycle. 2018. Facility/Site Summary Details: Cold Canyon Landfill, Inc. (40-AA-0004). Available at: http://www.calrecycle.ca.gov/SWFacilities/Directory/40-AA-0004/Detail/. Accessed May 14, 2018.

California Environmental Protection Agency. 2018. Hazardous Waste and Substances site "Cortese" list. Available at: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/. Accessed May 15, 2018.

County of San Luis Obispo. 2006. Parks and Recreation Element of the San Luis Obispo County General Plan. Available at: https://www.slocounty.ca.gov/getattachment/685896c6-bdbe-47ff-ae54-2ee55fdfc4ac/Parks-and-Recreation-Element.aspx, Accessed May 14, 2018.

———. 2018a.Natural Hazards Map: Earthquake Fault Zone. Available at: https://www.slocounty.ca.gov/getattachment/7260e666-b925-4c1a-883f-732c31e63ac8/Earthquake-Fault-Zone-Map.aspx, Accessed May16, 2018.

———. 2018b. Noise Ordinance. Available at: http://www.nonoise.org/lawlib/cities/ca/sanluis_ca.htm, Accessed May 14, 2018.

National Marine Fisheries Service (NMFS). 2015. 2015. Letter from Alicia Van Atta (NMFS) to Vick Germany (PG&E) regarding the clearing vegetation from a portion of the right-of-way (ROW) for L-306 and potential effects to South-Central California Coast (SCCC) Distinct Population Segment of steelhead (Administrative File: 10012WCR2015CC00280). November 18.

San Luis Obispo County Air Pollution Control District (SLOAPCD). 2012. CEQA Air Quality Handbook, Available at: http://www.slocleanair.org/images/cms/upload/files/CEQA_Handbook_2012_v1.pdf. Accessed May 14, 2018.

Sawyer, J.O., T. Keeler-Wolf, and J.M. Evans. 2009. *Manual of California Vegetation*, 2nd ed. California Native Plant Society, Sacramento, California. 1300 pp.

SWCA Environmental Consultants. 2014a. Technical Assistance Report for Potential Impacts to South Central California Coast Steelhead at RW-V-523-14 Pipeline Pathways Vegetation Management Project, San Luis Obispo County, California. Prepared for Pacific Gas and Electric Company.

———. 2014b. Technical Assistance Report for Potential Impacts to South Central California Coast Steelhead at RW-V 518 13 Pipeline Pathways Vegetation Management Project, San Luis Obispo County, California. Prepared for Pacific Gas and Electric Company (June).

———. 2014c. Technical Assistance Report for Potential Impacts to California Red-legged Frog at RW-V 523 14 Pipeline Pathways Vegetation Management Project, San Luis Obispo County, California. Prepared for Pacific Gas and Electric Company (July).

———. 2014d. Technical Assistance Report for Potential Impacts to California Red-legged Frog at RW-V 518 13 Pipeline Pathways Vegetation Management Project, San Luis Obispo County, California. Prepared for Pacific Gas and Electric Company (June).

U.S. Environmental Protection Agency (EPA). 2007. Final Stipulated Injunction and Related Information Involving Pesticides and the California Red-Legged Frog. Federal Register Document, Docket ID: EPA-HQ-OPP-2006-070. Federal Register 72(79): 20544-20545.

U.S. Fish and Wildlife Service (USFWS). 2014a. Letter from Douglass M. Cooper (USFWS) to Vick Germany (PG&E) Review of Pacific Gas and Electric's Avoidance and Minimization Measures for the Vegetation Removal Project from Atascadero to Morro Bay, San Luis Obispo County, California (OSEVEN00-2014-TA-0362). October 7.

_____. 2014b. Letter from Douglass M. Cooper (USFWS) to Vick Germany (PG&E) Review of Pacific Gas and Electric's Avoidance and Minimization Measures for the Vegetation Removal Project for the RW-V-523-13_L-306 Pipeline Crossing of Morro Creek, San Luis Obispo County, California (08EVEN00-2015-CP A-0013). December 18.

Exhibit B - Mitigation Summary Table

Per Public Resources Code Section 21081.6, the following measures also constitute the mitigation monitoring and/or reporting program that will reduce potentially significant impacts to less than significant levels. These measures will become conditions of approval (COAs) should the project be approved. The Lead Agency (County) or other Responsible Agencies, as specified in the following measures, are responsible to verify compliance with these COAs.

Biological Resources

BIO/mm-1 *A qualified biologist shall conduct pre-activity surveys for special status species within 30 days before start of work and immediately before the start of each day's project activities.*

a. *The survey area shall include the project sites, staging areas, and access routes and within a 1,000-foot radius of the project sites and staging areas at the RW-V-523-13 and RW-V-518S sites. A 200-foot buffer shall be sufficient for the RW-V-518N site. If the 200 or 1,000-foot radius is not within the existing right-of-way or not otherwise accessible, this distance may be reduced. However, the biologist shall visually survey at least 1,000 feet (or 200 feet) using binoculars, spotting scopes and other visual surveying equipment.*

b. *If water is present within the project sites, staging areas, and the 1,000-foot buffers at the RW-V-523-13 and RW-V-518S sites, work shall be suspended in those areas until the area is dry, at which time another pre-activity survey shall be conducted as described above.*

c. *If any special-status species are observed during the pre-activity survey, work shall be delayed in the immediate project site and the qualified biologist shall contact the County to determine if additional measures are required.*

BIO/mm-2 *A qualified biologist shall be present during all project activities to inspect project sites and surrounding areas to ensure the impacts to wildlife species are avoided and minimized to the extent possible.*

BIO/mm-3 *Any herbicide treatment performed near wetland, streams, or waterways would also be performed in accordance with the 2006 Final Stipulated Injunction and Related Information Involving Pesticides and the California Red-legged Frog (U.S. Environmental Protection Agency 2007) to avoid detrimental herbicide impacts to California red-legged frog.*

BIO/mm-4 *If work is scheduled to take place from March 1 through August 31, a pre-activity nesting bird survey shall be conducted by a qualified biologist within 30 days and again within 14 days of mobilization, covering a radius of 250 feet for non-raptors and 500 feet for raptors. If any active nests are observed, the nests and trees shall be protected with a minimum 250 or 500-foot buffer (for non-raptors and raptors, respectively) until young have fledged and are no longer reliant on the nest site or parental care. These buffers may be adjusted upon consultation between CDFW and a PG&E biologist.*

BIO/mm-5 *Prior to any tree removal, all applicable agency permits with jurisdiction over the project area (i.e., CDFW, RWQCB) shall be obtained, as necessary. All additional mitigation*

measures required by these agencies shall be implemented as necessary throughout the project.

BIO/mm-6 *Prior to any tree removal, the applicant shall provide confirmation that they have entered into a Habitat Restoration and Enhancement Agreement with the Upper Salinas Las Tablas Resource Conservation District to provide for off-site compensatory mitigation for RW_V_523_13, 518N and 518S by planting 172 riparian trees.*

Cultural Resources

CR/mm-1 *Prior to project implementation, the Applicant shall prepare an Archaeological Monitoring Plan (AMP). The AMP shall include (but not be limited to) the following:*

a. *A list of personnel involved in the monitoring activities;*

b. *Description of Native American involvement;*

c. *Description of how the monitoring shall occur;*

d. *Description of frequency of monitoring (e.g., full time, part time, spot checking);*

e. *Description of what resources are expected to be encountered;*

f. *Description of circumstances that would result in the halting of work at the project site;*

g. *Description of procedures for halting work on the site and notification procedures;*

h. *Description of monitoring reporting procedures; and,*

i. *Provide specific, detailed protocols for what to do in the event of the discovery of human remains.*

CR/mm-2 *An archaeological and Native American monitor shall be present during project related ground disturbing activities that have the potential to encounter previously unidentified archaeological resources, as outlined in the AMP prepared to satisfy CR/mm-1. Archaeological monitoring may cease at any time if the County-qualified archaeologist, in coordination with project's Environmental Coordinator, determine that project activities do not have the potential to encounter and/or disturb unknown resources.*

DEVELOPER'S STATEMENT FOR
PG&E GAS PIPELINE 306 VEGETATION MANAGEMENT PROJECT / MINOR USE USE PERMIT / COASTAL DEVELOPMENT PERMIT DRC2016-00135 /

The applicant agrees to incorporate the following measures into the project. These measures become a part of the project description and therefore become a part of the record of action upon which the environmental determination is based. All development activity must occur in strict compliance with the following mitigation measures. These measures shall be perpetual and run with the land. These measures are binding on all successors in interest of the subject property.

Note: The items contained in the boxes labeled "Monitoring" describe the County procedures to be used to ensure compliance with the mitigation measures.

The following mitigation measures address impacts that may occur as a result of the development of the project.

Biological Resources

BIO-1 A qualified biologist shall conduct pre-activity surveys for special status species within 30 days before start of work and immediately before the start of each day's project activities.

a. The survey area shall include the project sites, staging areas, and access routes and within a 1,000-foot radius of the project sites and staging areas at the RW-V-523-13 and RW-V-518S sites. A 200-foot buffer shall be sufficient for the RW-V-518N site. If the 200 or 1,000-foot radius is not within the existing right-of-way or not otherwise accessible, this distance may be reduced. However, the biologist shall visually survey at least 1,000 feet (or 200 feet) using binoculars, spotting scopes and other visual surveying equipment.

b. If water is present within the project sites, staging areas, and the 1,000-foot buffers at the RW-V-523-13 and RW-V-518S sites, work shall be suspended in those areas until the area is dry, at which time another pre-activity survey shall be conducted as described above.

c. If any special-status species are observed during the pre-activity survey, work shall be delayed in the immediate project site and the qualified biologist shall contact the County to determine if additional measures are required.

BIO-2 A qualified biologist shall be present during all project activities to inspect project sites and surrounding areas to ensure the impacts to wildlife species are avoided and minimized to the extent possible.

BIO-3 Any herbicide treatment performed near wetland, streams, or waterways would also be performed in accordance with the 2006 Final Stipulated Injunction and Related Information Involving Pesticides and the California Red-legged Frog (U.S. Environmental Protection Agency 2007) to avoid detrimental herbicide impacts to California red-legged frog.

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BIO-5 Prior to any tree removal, all applicable agency permits with jurisdiction over the project area (i.e., CDFW, RWQCB) shall be obtained, as necessary. All additional mitigation measures required by these agencies shall be implemented as necessary throughout the project.

BIO-6 Prior to any tree removal, the applicant shall provide confirmation that they have entered into a Habitat Restoration and Enhancement Agreement with the Upper Salinas Las Tablas Resource Conservation District to provide for off-site compensatory mitigation for RW_V_523_13, 518N and 518S by planting 172 riparian trees.

Monitoring (Biological Resource Measures BIO-1 to BIO-6) Compliance will be verified by the County Department of Planning and Building, in consultation with the Environmental Coordinator.

Cultural Resources

CR-1 Prior to project implementation, the Applicant shall prepare an Archaeological Monitoring Plan (AMP). The AMP shall include (but not be limited to) the following:

a. A list of personnel involved in the monitoring activities;

b. Description of Native American involvement;

c. Description of how the monitoring shall occur;

d. Description of frequency of monitoring (e.g., full time, part time, spot checking);

e. Description of what resources are expected to be encountered;

f. Description of circumstances that would result in the halting of work at the project site;

g. Description of procedures for halting work on the site and notification procedures;

h. Description of monitoring reporting procedures; and,

i. Provide specific, detailed protocols for what to do in the event of the discovery of human remains.

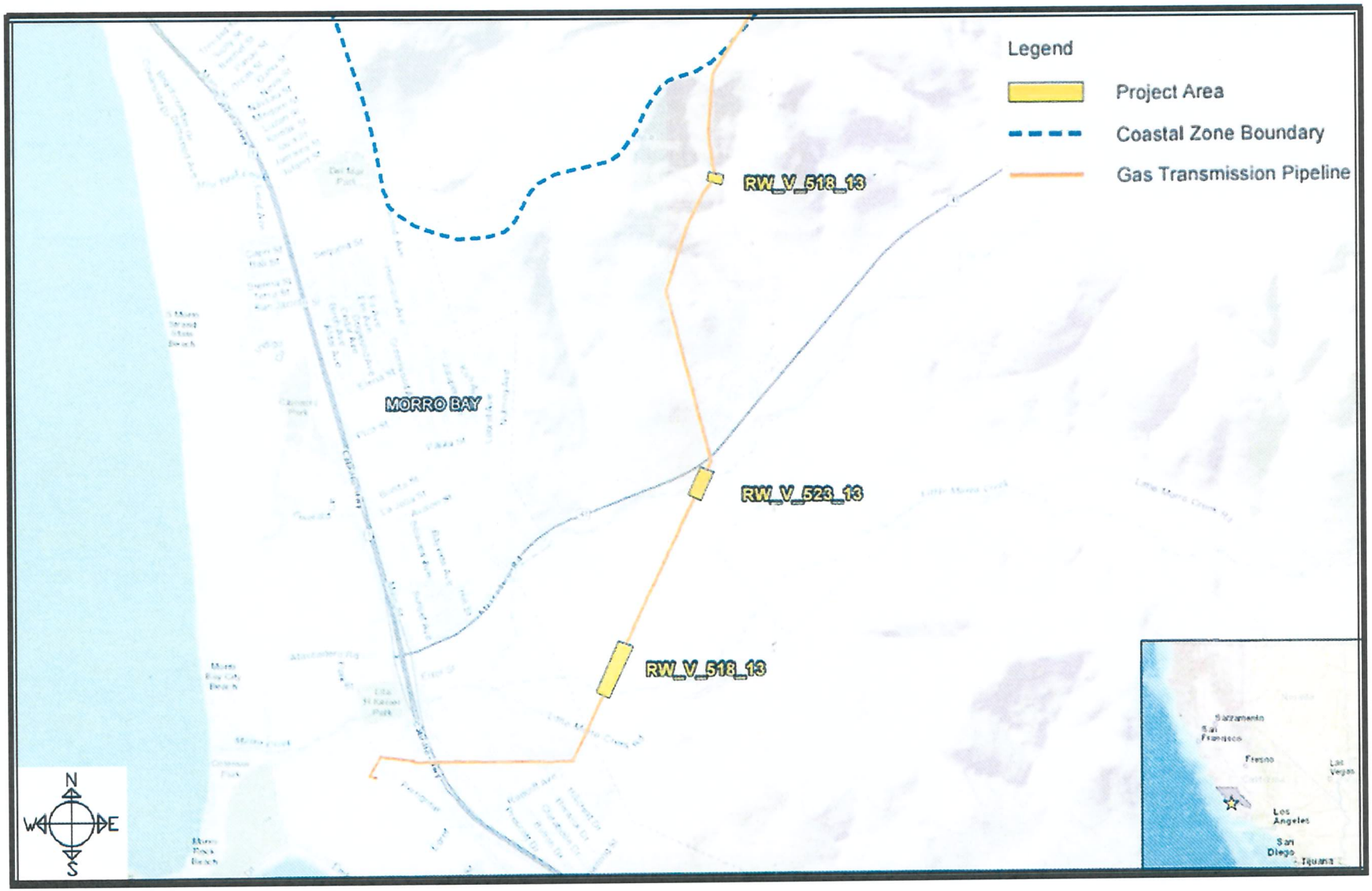
CR-2 An archaeological and Native American monitor shall be present during project related ground disturbing activities that have the potential to encounter previously unidentified archaeological resources, as outlined in the AMP prepared to satisfy CR/mm-1. Archaeological monitoring may cease at any time if the County-qualified archaeologist, in coordination with project's Environmental Coordinator, determine that project activities do not have the potential to encounter and/or disturb unknown resources.

Monitoring (Biological Resource Measures CR-1 to CR-2) Compliance will be verified by the County Department of Planning and Building, in consultation with the Environmental Coordinator.

The applicant understands that any changes made to the project description subsequent to this environmental determination must be reviewed by the Environmental Coordinator and may require a new environmental determination for the project. By signing this agreement, the owner(s) agrees to and accepts the incorporation of the above measures into the proposed project description.

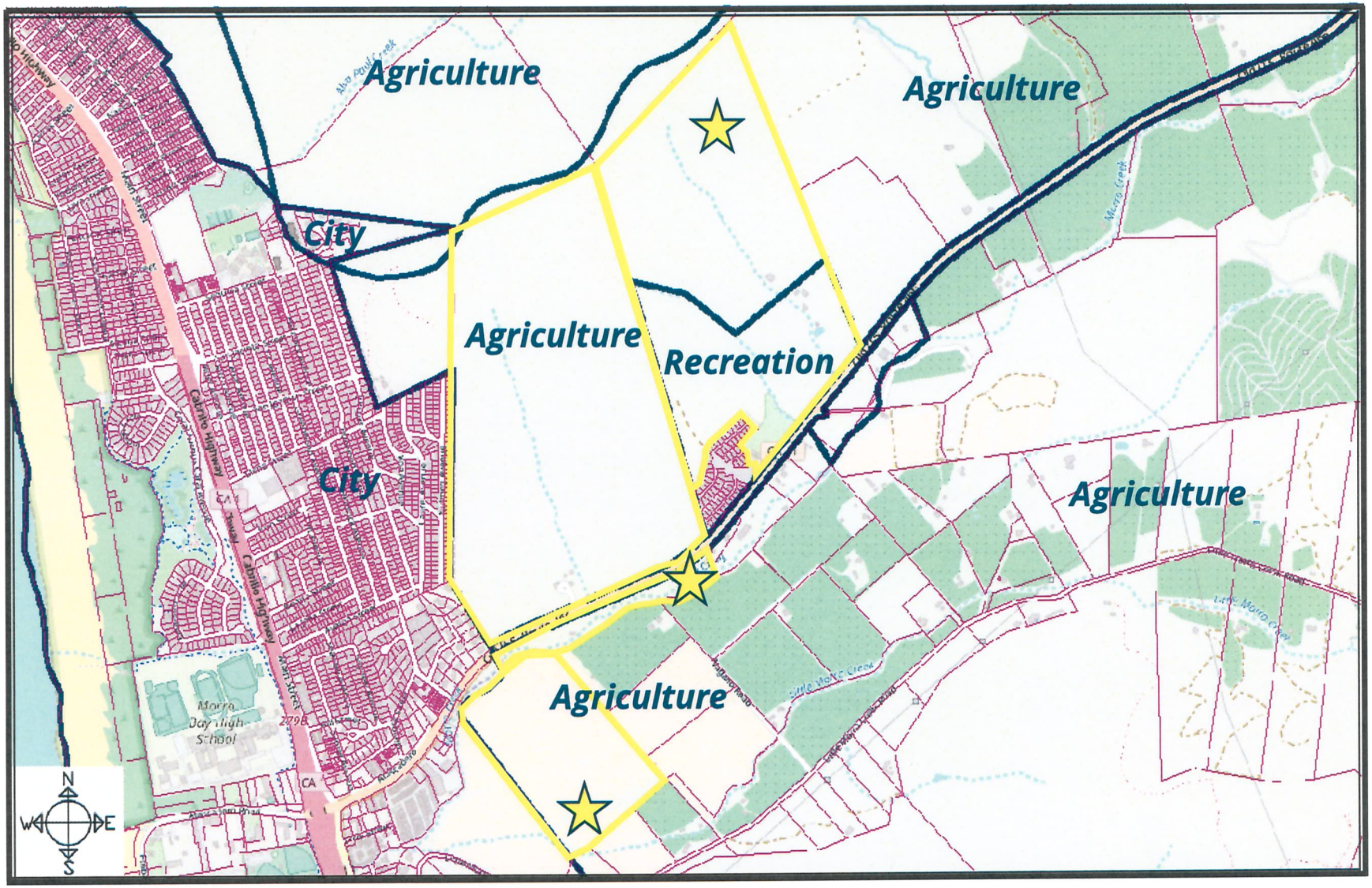
Signature of Agent(s) 9/18/18 Date

Adam Cleary
Name (Print)



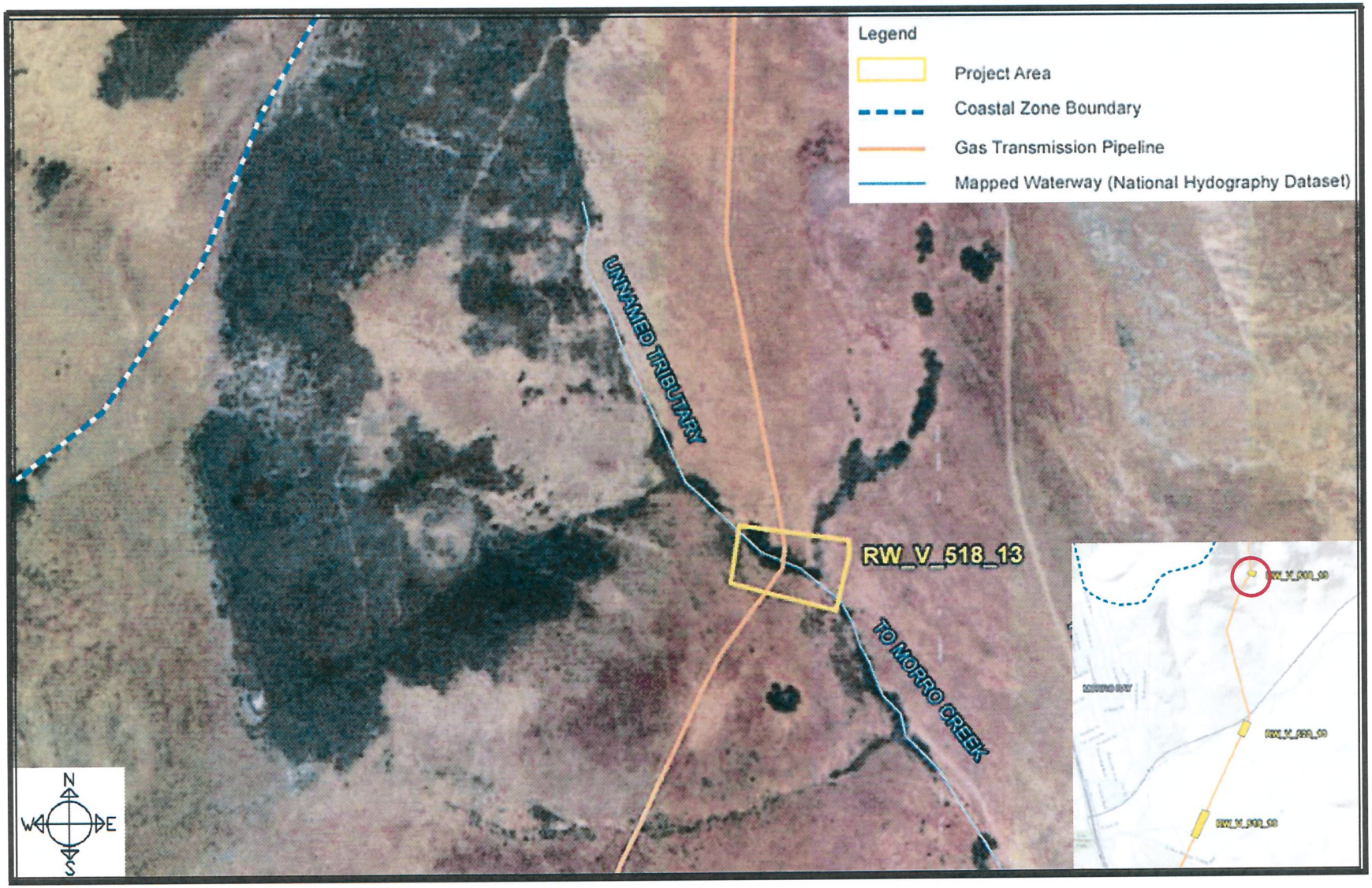
COUNTY OF SAN LUIS OBISPO

Vicinity Map
DRC2016-00135



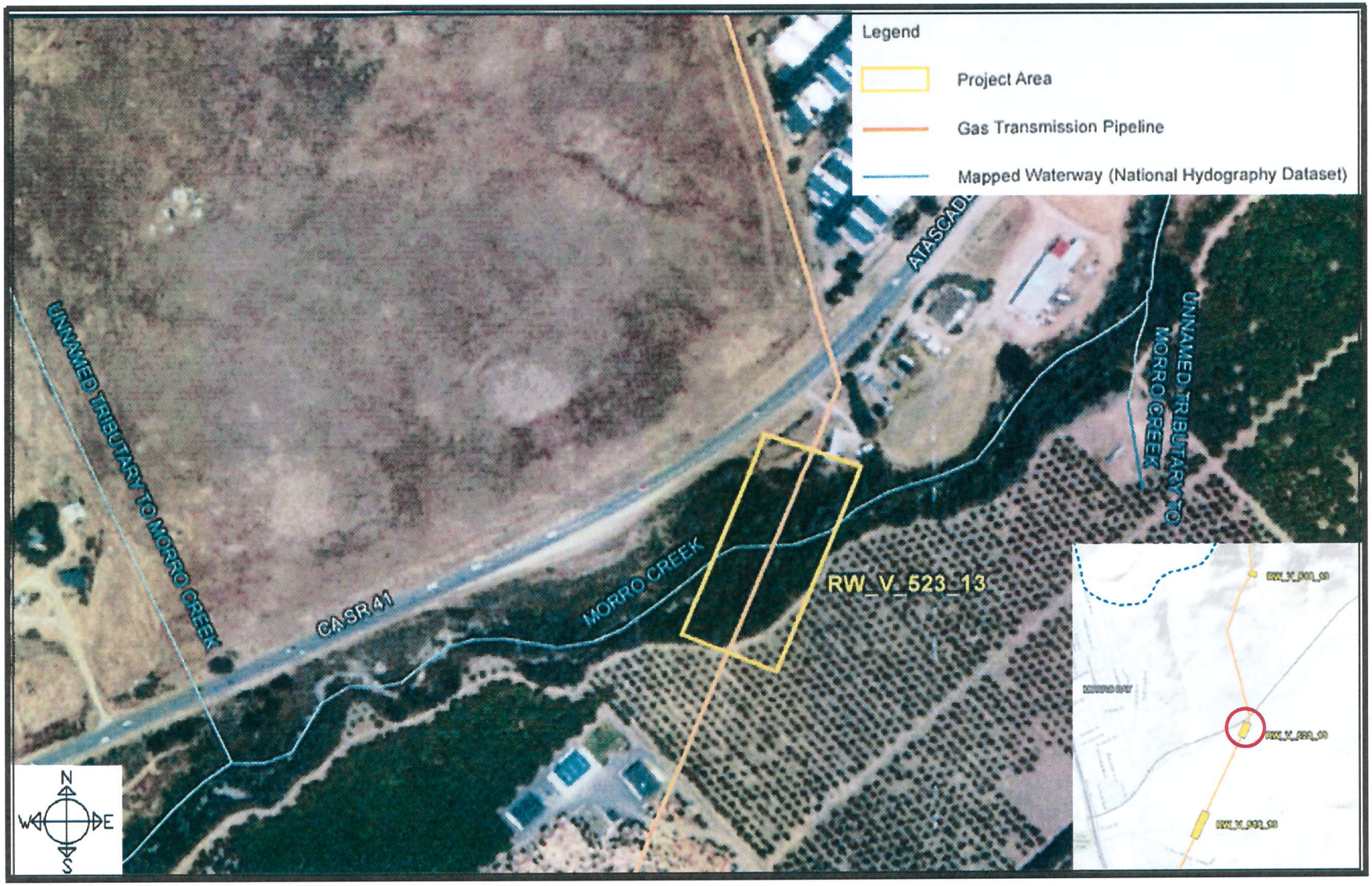
COUNTY OF SAN LUIS OBISPO

Land Use Category Map
DRC2016-00135



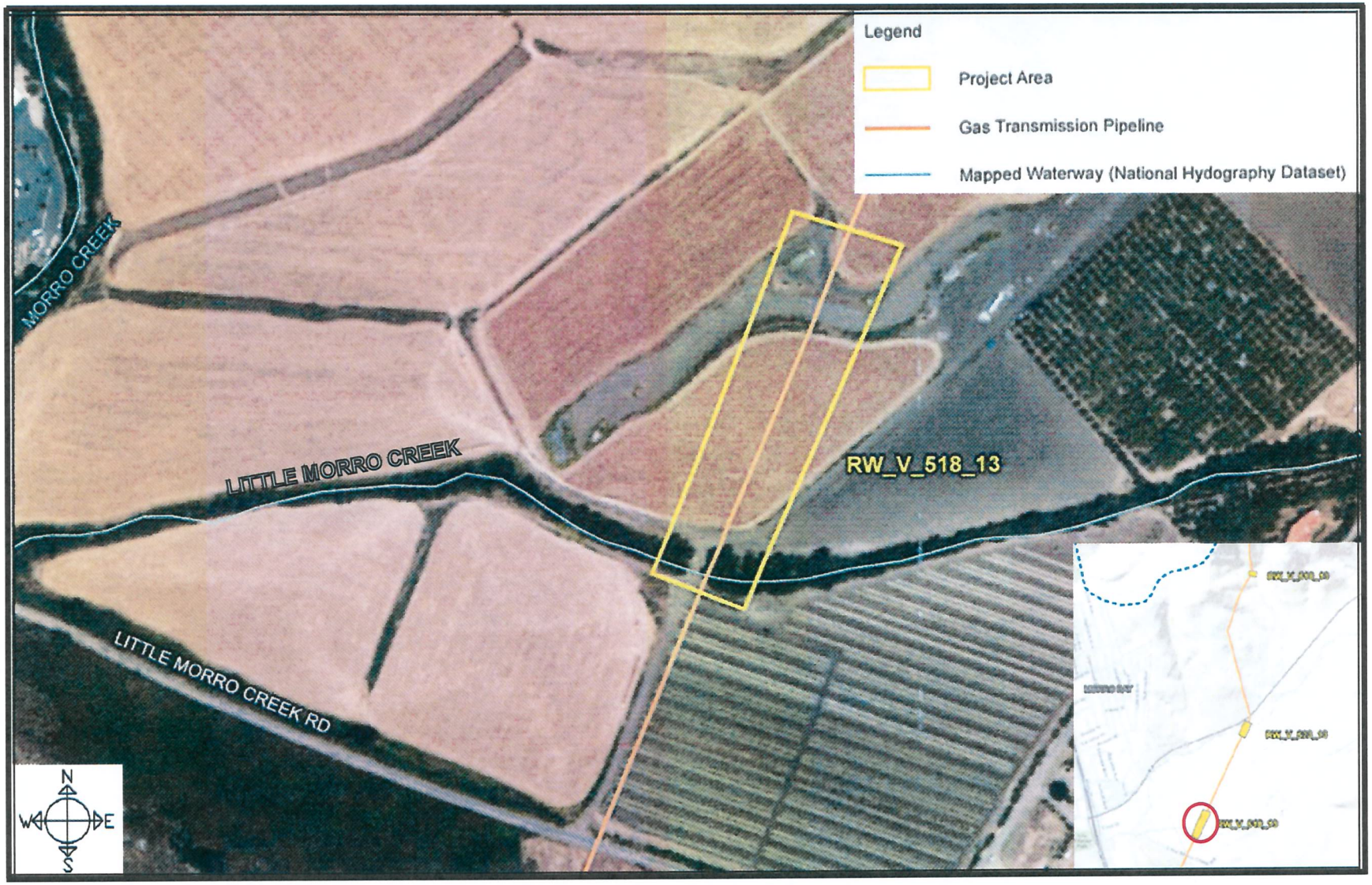
COUNTY OF SAN LUIS OBISPO

RW_V_518_13 Aerial
DRC2016-00135



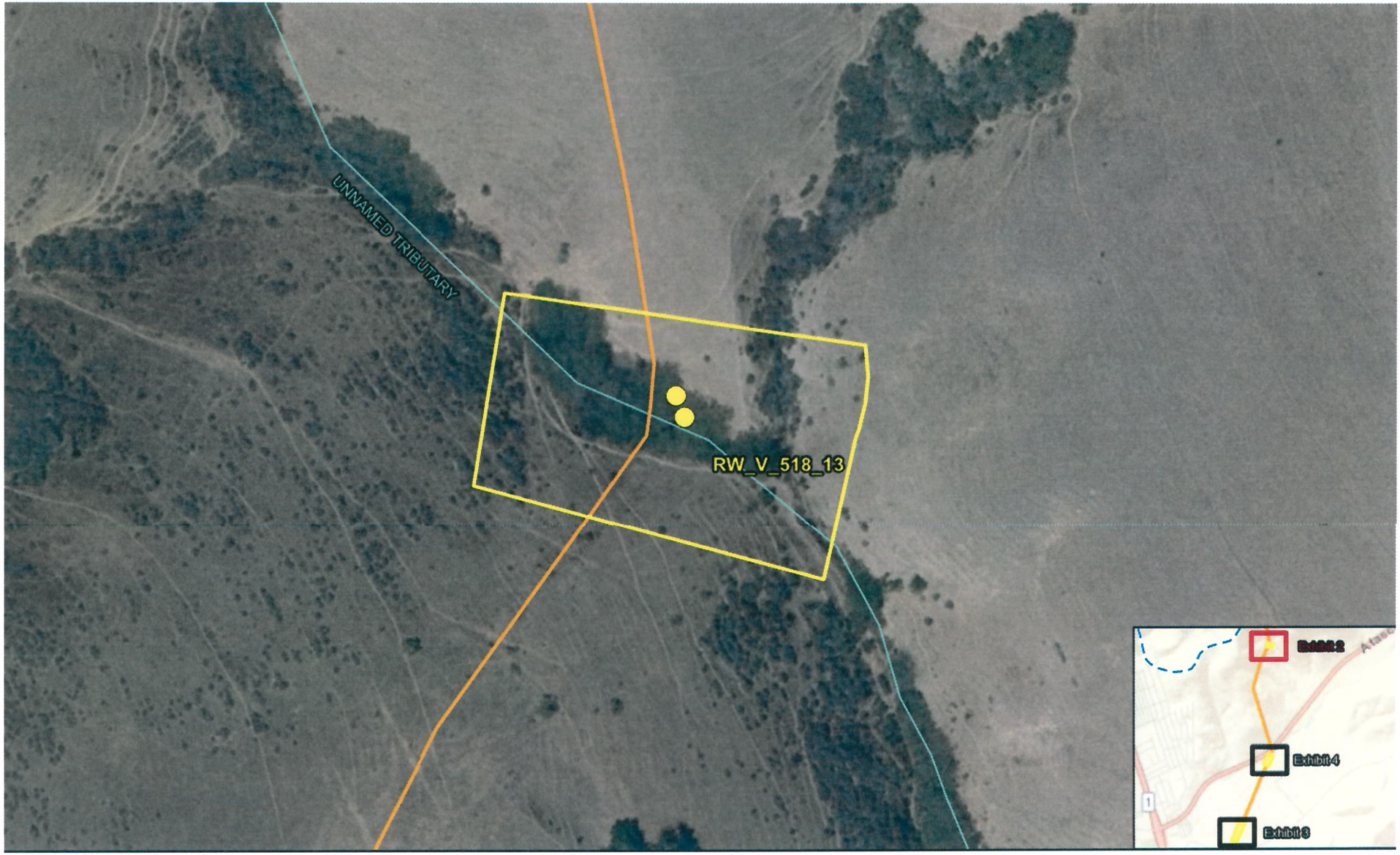
COUNTY OF SAN LUIS OBISPO

RW_V_523_13 Aerial
DRC2016-00135



COUNTY OF SAN LUIS OBISPO

RW_V_518_13 Aerial
DRC2016-00135



Legend

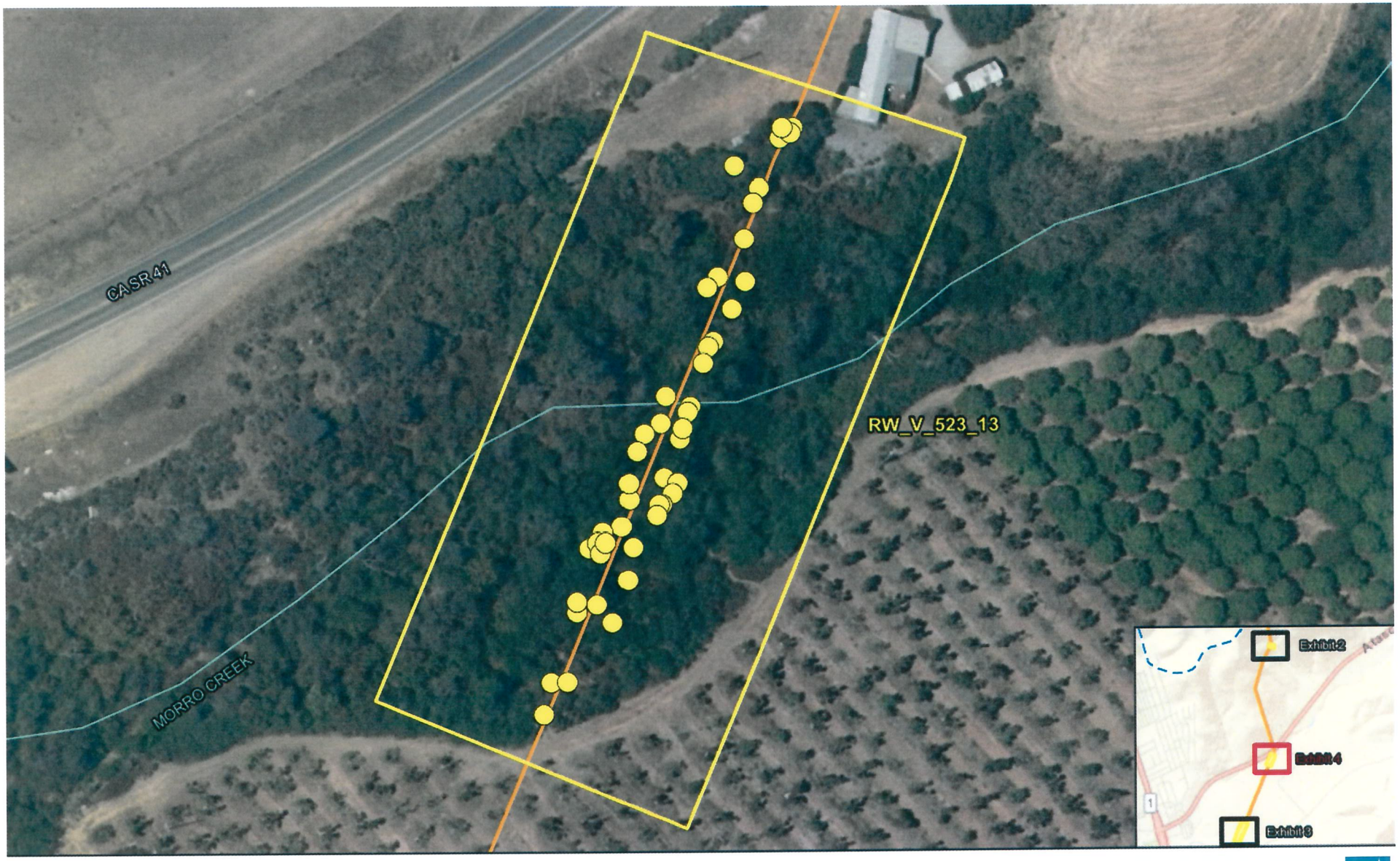
- Project Area
- Vegetation Removal
- Gas Transmission Pipeline
- Mapped Waterway (National Hydography Dataset)

Vegetation is proposed to be removed for safety reasons

Exhibit 2
Coastal Development Permit Site Map - Vegetation Removals
RW_V_518_13
Community Pipeline Safety Initiative
San Luis Obispo County, CA

0 15 30 60
Feet
1:1,000

PG&E Critical Infrastructure Information. Facilities to be operated by PG&E personnel only. Point, pipeline, boundary and area locations are approximate and for illustrative purposes only. Data subject to updates. Call 811 before you dig. Map Created: 09/04/2018



Legend

- Project Area
- Vegetation Removal
- Gas Transmission Pipeline
- Mapped Waterway (National Hydography Dataset)

Vegetation is proposed to be removed for safety reasons

Exhibit 4
Coastal Development Permit Site Map - Vegetation Removals
RW_V_523_13
Community Pipeline Safety Initiative
San Luis Obispo County, CA

0 15 30 60
Feet
1:1,000

PG&E Critical Infrastructure Information. Facilities to be operated by PG&E personnel only.
Point, pipeline, boundary and area locations are approximate and for illustrative purposes only.
Data subject to updates. Call 811 before you dig. Map Created: 09/04/2018

Legend

- Project Area
- Vegetation Removal
- Gas Transmission Pipeline
- Mapped Waterway (National Hydography Dataset)

Vegetation is proposed to be removed for safety reasons

Exhibit 3
Coastal Development Permit Site Map - Vegetation Removals
RW_V_518_13
Community Pipeline Safety Initiative
San Luis Obispo County, CA

0 15 30 60
Feet
1:1,000

PG&E Critical Infrastructure Information. Facilities to be operated by PG&E personnel only. Point, pipeline, boundary and area locations are approximate and for illustrative purposes only. Data subject to updates. Call 811 before you dig. Map Created: 09/06/2018