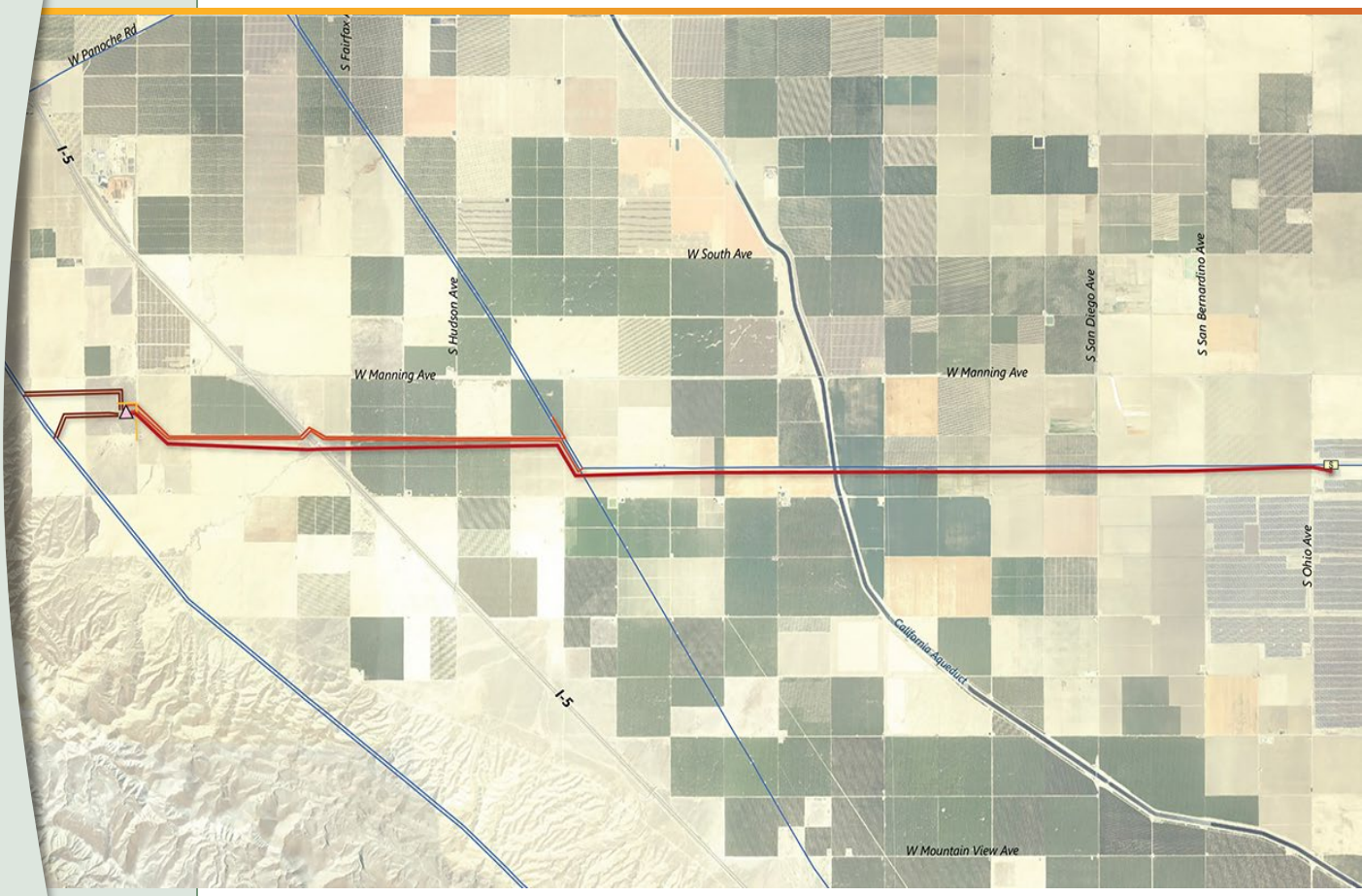

Final Initial Study/Mitigated Negative Declaration

LS Power Grid California Manning 500/230 Kilovolt Substation Project

Prepared for:

California Public Utilities Commission

June 2025

Final Initial Study/Mitigated Negative Declaration

LS Power Grid California Manning 500/230 Kilovolt Substation Project

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June 2025

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LIST OF ABBREVIATIONS

AC	alternating current
AIA	Air Impact Assessment
AMBA	American badger
APM	Applicant-Proposed Measure
ATC	Authority to Construct
BACT	Best Available Control Technology
BRTR	Biological Resources Technical Report
BUOW	burrowing owl
CBB	Crotch's bumble bee
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CM	Construction Measure
CNPS	California Native Plant Society
CPCN	certificate of public convenience and necessity
CPUC	California Public Utilities Commission
CTS	Coupon Test Station
EPA	US Environmental Protection Agency
FESA	Federal Endangered Species Act
GKR	giant kangaroo rat
HFHSZ	high fire hazard severity zone
HMMP	hazardous materials management plan
IS	initial study
ISR	Indirect Source Review
ITP	incidental take permit
LSAA	Lake or Streambed Alteration Agreement
LSPGC	LS Power Grid California
LST	lattice steel tower
MMCRP	mitigation monitoring, compliance, and reporting program
MND	mitigated negative declaration
NOC	Notice of Construction
NOI	notice of intent
PG&E	Pacific Gas & Electric
PM	particulate matter

PTO	Permit to Operate
SBA	Small Business Assistance
SJAS	San Joaquin antelope squirrel
SJKF	San Joaquin kit fox
SJVAPCD	San Joaquin Valley Air Pollution Control District
SJVHCP	San Joaquin Valley Habitat Conservation Plan
SWHA	Swainson's hawk
VERA	Voluntary Emission Reduction Agreement

1 INTRODUCTION

1.1 CEQA PROCESS

Pursuant to the requirements of the California Environmental Quality Act (CEQA) and California Public Utilities Commission (CPUC) General Order (GO) 131-D, the CPUC prepared an initial study (IS) to evaluate environmental impacts that could result from approval of the June 28, 2024 application by LS Power Grid, California, LLC (LSPGC or Applicant) (A.24-06-017) for a certificate of public convenience and necessity (CPCN) authorizing the construction of the proposed Manning 500/230 Kilovolt (kV) Substation Project (project). The IS determined that with implementation of mitigation measures, applicant-proposed measures, and construction measures, the project would not have a significant adverse effect on the environment, and a mitigated negative declaration (MND) was prepared.

On March 19, 2025, the CPUC filed a notice of intent (NOI) to adopt an MND with the Governor's Office of Land Use and Climate Innovation (State Clearinghouse), and released the IS/MND for a 30-day public review period. The NOI for the IS/MND was distributed to federal, state, and local agency representatives; property owners; and other interested individuals. Additionally, a public notice was published in the *Fresno Bee*, a newspaper of general circulation in the project area, on March 19, 2025, announcing the availability of the IS/MND for public review in compliance with State CEQA Guidelines Section 15072(b). In accordance with Section 15105(b) of the State CEQA Guidelines, the public review and comment period began on March 19, 2025, and ended on April 18, 2025. Copies of all written comments received on the IS/MND are contained in this Final IS/MND (refer to Appendix 3).

This Final IS/MND incorporates comments received during the public review period and contains responses to those comments by the CEQA lead agency (the CPUC). The comments received resulted in minor changes to the Proposed IS/MND to correct, amplify, or clarify certain points; however, the Proposed IS/MND has not been substantially revised following issuance of its NOI. The Final IS/MND includes the following:

- a list of organizations and public agencies that commented on the IS/MND;
- comments received on the IS/MND, including responses to the comments; and
- IS/MND as revised (Appendix 1).

1.2 PUBLIC REVIEW PROCESS

On March 19, 2025, the CPUC mailed a notice to agencies, organizations, and individuals announcing that the Proposed IS/MND was available for public review. The CPUC established an email address (manning@ascent.inc) and a project website (https://ia.cpuc.ca.gov/environment/info/ascent/manning/index.html) to provide information on the project. In accordance with Section 15105(b) of the State CEQA Guidelines, the public review period for the Proposed IS/MND began on March 19, 2025, and ended on April 18, 2025.

1.3 SUMMARY OF IMPACT CONCLUSIONS

The CPUC has found, based on the analysis conducted in this IS (including any comments received), that there is no substantial evidence that the project would have a significant environmental impact. Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. Argument, speculation, and unsubstantiated opinion or narrative do not constitute substantial evidence (CEQA Section 21080[e]; State CEQA Guidelines Section 15064[f][5]). Project features and measures identified in the Final IS/MND and to be required as conditions of certification of approval for the proposed project would avoid or reduce all impacts to a less-than-significant level.

1.4 DOCUMENT ORGANIZATION

This IS/MND is organized as follows:

- Chapter 1: "Introduction." This chapter provides an introduction to the IS/MND and public review process, including organization of this document.
- Chapter 2: "Comments and Responses to Comments." This chapter presents the comments received during the public review period and responses to comments.
- Chapter 3: "Revisions to the IS/MND." This chapter presents revisions to the IS/MND based on comments received during the public review period.
- Chapter 4: "References." This chapter lists the references used in preparation of this Final IS/MND.
- Chapter 5: "List of Preparers." This chapter identifies report preparers.

2 COMMENTS AND RESPONSES TO COMMENTS

2.1 INTRODUCTION

This chapter contains reproduced comments from letters received during the public review period for the Proposed IS/MND, which concluded on April 18, 2025. Comment letters are presented in their entirety in Appendix 3. Responses to comments on environmental issues received on the Proposed IS/MND are also provided in this chapter. Typographical and editorial revisions suggested in comments have been directly addressed in the Final IS/MND as shown in Appendix 1 and do not warrant a written response. All other comments have been responded to in Section 2.3. Any images included in comment letters are included in Appendix 3, which includes each comment letter in its entirety.

2.2 COMMENTS RECEIVED ON THE PROPOSED IS/MND

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

Table 2-1 Comments Received on the Proposed IS/MND

Letter No.	Commenter	Date
AGENCIES		
A1	Mark Montelongo, San Joaquin Valley Air Pollution Control District	April 17, 2025
A2	Julie Vance, California Department of Fish and Wildlife	April 18, 2025
A3	Arianna Brown, Fresno County	April 30, 2025 Resubmitted May 15, 2025
ORGANIZATIONS		
O1	Doug Edwards, Pacific Gas and Electric	April 17, 2025
O2	Dustin Joseph, LS Power Grid California, LLC	April 18, 2025

2.3 COMMENTS AND RESPONSES

The comments received on the Proposed IS/MND and the responses to those comments are provided below. The comment letters are reproduced verbatim in their entirety. No edits have been made to the original comments, and spelling, grammatical, and other errors have been retained.

2.3.1 Agencies

Letter A1 San Joaquin Valley Air Pollution Control District

Mark Montelongo, Director of Policy and Government Affairs
April 17, 2025

Comment A1-1

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) from the California Public Utilities Commission (CPUC) for the Manning 500/230 Kilovolt (kV) Substation Project (Project). Per the IS/MND, the Project consists of the construction and operation of the new Manning Substation and one new 11.5 mile overhead double-circuit 230 kV transmission line that would extend from the proposed Manning Substation to interconnect with the existing Tranquility Switching Station. The Project would

also include interconnections, reconductoring, and related modification of existing transmission lines and related facilities. The Project is located in western Fresno County, east of the Bureau of Land Management's Tumey Hills recreation area, and south of Manning Avenue.

Response A1-1
These introductory remarks are acknowledged for the record and will be provided to the decision makers for consideration.

Comment A1-2
The District offers the following comments at this time regarding the Project:

1) Project Related Emissions

The IS/MND demonstrates Project construction emissions are not expected to exceed the District's significance thresholds based on the Project utilizing mitigation measures such as, Mitigation Measure AIR-1. In the IS/MND, Mitigation Measure AIR-1 states "At least 75 percent of construction equipment with a rating between 100 and 750 horsepower will be required to use engines compliant with Environmental Protection Agency Tier 4 non-road engine standards. In the event that enough Tier 4 equipment is not available to meet the 75-percent threshold, documentation of the unavailability will be provided, and engines utilizing a lower standard will be used." Since Mitigation Measure AIR-1 allows for use of alternative (i.e., non-Tier 4) equipment the construction air quality emissions presented in the IS/MND may be underestimated. Therefore, the District recommends the Project construction air quality emission quantification reflect the potential use of alternative (i.e., non-Tier 4) equipment in the event Tier 4 construction equipment is not available.

Based on the above, should the criteria pollutant emissions from construction exceed the District's significance thresholds, the District recommends the IS/MND also include a discussion on the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA). A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of agricultural equipment with the latest generation technologies.

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-related emissions have been mitigated.

Response A1-2
As discussed on page 3-62 of the Final IS/MND (see Appendix 1), Applicant-Proposed Measure (APM) AIR-1 and Construction Measure (CM) AIR-1 do not require the use of Tier 4 engines in at least 75 percent of the construction equipment, and it cannot be ensured that such reductions would be achieved. Therefore, the IS/MND includes CM AQ-A [PG&E]/Mitigation Measure AQ-1 [LSPGC], which would supersede and replace LSPGC APM AIR-1 and PG&E CM AIR-1. CM AQ-A [PG&E]/Mitigation Measure AQ-1 [LSPGC] requires project engineers to use engines that meet the US Environmental Protection Agency's (EPA's) Tier 4 emission standards in at least 75 percent of construction equipment with a rating between 100 and 750 horsepower (hp). If Tier 4 equipment cannot be used, the measure provides an alternative option for using battery-electric off-road equipment, as it becomes available, for at least 75 percent of construction equipment or by using a combination of engines that meet the EPA's Tier 4 emission standards and battery-electric off-road construction equipment, as long as the total of Tier 4 and battery-electric

construction equipment comprises 75 percent of construction equipment. Implementation of CM AQ-A [PG&E]/Mitigation Measure AQ-1 [LSPGC] requires Tier 4 or battery-electric off-road construction equipment and ensures that emissions would not exceed emissions thresholds provided by the San Joaquin Valley Air Pollution Control District (SJVAPCD). Table 3.3-5 shows that with the use of 75 percent Tier 4 or battery-electric off-road construction equipment (i.e., implementation of CM AQ-A [PG&E]/Mitigation Measure AQ-1 [LSPGC]), thresholds would not be exceeded. Therefore, no revisions to CM AQ-A [PG&E]/Mitigation Measure AQ-1 [LSPGC] or alternative emissions quantification are warranted.

Comment A1-3

2) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

Response A1-3

The summary of SJVAPCD's Regulation II, Rule 2010, Rule 2201, and Rule 2301 is acknowledged for the record and will be provided to the decision makers for consideration. Please refer to Responses A1-4 through A1-9 related to SJVAPCD rules and regulations.

Comment A1-4

2a) District Rule 2010 and 2201 – Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, the Project proponent should submit to the District an application for an ATC. For further information or assistance, the project proponent may contact the District's SBA Office at (559) 230-5888.

Response A1-4

SJVAPCD regulations are summarized on pages 3-54 and 3-55 of the Final IS/MND. As stated therein, "Because the project would not involve construction of new stationary sources, there are no permitting regulations relevant to the project."

Comment A1-5

2b) District Rule 9510 – Indirect Source Review (ISR)

The Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency and will equal or exceed 9,000 square feet of space.

The purpose of District Rule 9510 is to reduce the growth in both NOx and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

Per Section 5.0 of the ISR Rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. As of the date of this letter, the District has not received an AIA application for this Project. Please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510 so that proper mitigation and clean air design under ISR can be incorporated into the Project's design. One AIA application should be submitted for the entire Project.

Information about how to comply with District Rule 9510 can be found online at:
https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview

The AIA application form can be found online at:

https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/

District staff is available to provide assistance and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

Response A1-5
Although the Manning Substation Project (project) would exceed 9,000 square feet, it would not be characterized as a development or transportation project, which would trigger compliance with District Rule 9510. The project is a linear energy transmission project with minor mobile and area source emissions. The project would not result in the emission of nitrogen oxides (NO_X) or particulate matter (PM) above established thresholds. As shown in Table 3.3-7 of the Final IS/MND, project emissions would be far below established NO_X and PM thresholds, and clean air design elements would not be required.

Comment A1-6
2c) District Rule 4002 (National Emission Standards for Hazardous Air Pollutants)

In the event an existing building will be renovated, partially demolished or removed, the Project may be subject to District Rule 4002. This rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Information on how to comply with District Rule 4002 can be found online at: https://ww2.valleyair.org/compliance/demolition-renovation/

Response A1-6
The project does not include renovation or demolition of any structures such that workers would be exposed to asbestos. Therefore, District Rule 4002 does not apply to the proposed project.

Comment A1-7
2d) District Rule 4601 (Architectural Coatings)

The Project may be subject to District Rule 4601 since it may utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf

Response A1-7
The project does not include application of architectural coatings to structures. Therefore, District Rule 4601 does not apply to the proposed project.

Comment A1-8
2e) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at: https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx

Information about District Regulation VIII can be found online at: https://ww2.valleyair.org/dustcontrol

Response A1-8
SJVAPCD regulations are summarized on pages 3-54 and 3-55 of the Final IS/MND. This summary acknowledges the air district's rules intended to mitigate fugitive dust emissions, including Rule 8021. In addition, APM AIR-2 and CM AIR-2 include measures that LSPGC and PG&E have committed to implement to control fugitive dust in compliance with SJVAPCD standards. The project would be required to comply with all applicable permitting requirements as conditions of project approval.

Comment A1-9
2f) Other District Rules and Regulations

The Project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

Response A1-9
The applicability of Rule 4102 is limited to any source operation that emits or may emit air contaminants or other materials that may cause injury, detriment, nuisance, or annoyance to a considerable number of people or the public. As discussed on pages 3-54 and 3-55 of the Final IS/MND, there are no stationary sources proposed as part of the project, and operation and maintenance activities would be minimal, resulting in negligible health risks. Therefore, Rule 4102 is not applicable to the proposed project.

Rule 4641 applies to the manufacture and use of cutback asphalt, slow cure asphalt, and emulsified asphalt for paving and maintenance operations. The project would be statutorily required to comply with all requirements under Rule 4641. Information regarding Rule 4641 has been added under "Regulatory Setting" to page 3-54 of the Final IS/MND. No revisions to the analysis are warranted because of this addition.

Comment A1-10
District Comment Letter

The District recommends that a copy of the District's comments be provided to the Project proponent.

Response A1-10
The CPUC has provided this comment letter to LSPGC, the project applicant, and has noted the contact information for future reference.

Letter A2 California Department of Fish and Wildlife

Julie A. Vance, Regional Manager
April 18, 2025

Comment A2-1
The California Department of Fish and Wildlife (CDFW) received a MND from the California Public Utilities Commission (CPUC), for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

Response A2-1
These introductory remarks are acknowledged for the record and will be provided to the decision makers for consideration.

Comment A2-2
CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

California Endangered Species Act: A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86.) CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any Project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the lead agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the lead agency makes and supports findings of overriding consideration for impacts that remain significant despite the implementation of all feasible mitigation. Findings of consideration under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research,
- Efforts to recover a fully protected, endangered, or threatened species, live capture, and relocation of a bird species for the protection of livestock, or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Additionally, specified types of infrastructure projects may be eligible for a State ITP for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the project planning process if an ITP may be pursued for the Project.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs, and nests include 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for the Project.

Response A2-2

This comment provides background information about CDFW's role as a responsible agency, the various fish and wildlife resources under the agency's purview, and various applicable regulations (e.g., California Fish and Game Code, California Endangered Species Act). These introductory remarks are acknowledged for the record and will be provided to the decision makers for consideration.

Comment A2-3

PROJECT DESCRIPTION SUMMARY

Proponents: LS Power Grid California, LLC (LSPGC); Pacific Gas & Electric (PG&E)

Objective: The LSPGC portion of the Project proposes to construct and operate a new 500/230 kilovolt (kV) substation (Manning Substation) and an 11.5-mile 230 kV overhead transmission line, which would connect to PG&E's existing Tranquility Switching Station. The PG&E portion of the Project proposes to interconnect two existing 500 kV transmission lines (Los Banos-Midway #2 and Los Banos-Gates #1) and two existing 230 kV transmission lines (Panoche-Tranquility Switching Station #1 and #2) to Manning Substation, which involves reconductoring approximately seven miles of existing transmission lines. LSPGC has filed an application with CPUC for a certificate of public convenience and necessity for its portion of the Project, while PG&E plans to proceed with a Notice of Construction under General Order 131-E Section III.B; however, all Project components are analyzed together in the MND.

Location: The Manning Substation would be located on about 40 acres approximately 0.85 miles southwest of the Interstate 5 (I-5) and Manning Avenue interchange, in an unincorporated area of Fresno County near the cities of San Joaquin and Mendota. The new 11.5-mile transmission line would extend east and connect to the existing PG&E Tranquility Switching Station. PG&E's existing Los Banos-Midway #2 and Los BanosGates #1 transmission lines would be extended eastward approximately 0.7 and 1.1 miles, respectively, from their existing corridors to Manning Substation. PG&E's existing Panoche-Tranquility Switching Station #1 and #2 transmission lines would be extended westward approximately 4.5 miles from their existing corridors to Manning Substation.

Timeframe: The Project plans for commercial operation by June 2028.

Response A2-3
This comment summarizes the project description and location. These introductory remarks are acknowledged for the record and will be provided to the decision makers for consideration.

Comment A2-4
COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist CPUC in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the MND.

Currently, the MND acknowledges that the Project site is within the geographic range of several special-status animal and plant species and proposes specific mitigation measures to reduce impacts to less than significant. CDFW has concerns about the ability of some of the proposed mitigation measures to reduce impacts to less than significant and avoid unauthorized take for several special-status animal and plant species, particularly in the portions of the Project site west of I-5. These species include the State and federally endangered giant kangaroo rat (*Dipodomys ingens*), State threatened San Joaquin antelope squirrel (*Ammospermophilus nelsoni*), the State threatened and federally endangered San Joaquin kit fox (*Vulpes macrotis mutica*), the State threatened Swainson's hawk (*Buteo swainsoni*), the State candidate western burrowing owl (*Athene cunicularia hypugaea*) and Crotch's bumble bee (*Bombus crotchii*), the State species of special concern American badger (*Taxidea taxus*), and special-status plants including, but not limited to, the federally endangered San Joaquin woolly-threads (*Monolopia congdonii*).

Response A2-4
This comment introduces CDFW's comments and recommendations, which are provided in subsequent comments in full. No further response is warranted.

Comment A2-5
Giant kangaroo rat

The MND notes that giant kangaroo rat (GKR) has the potential to occur in the Project vicinity, and GKR occurrences are documented immediately adjacent to (and possibly) the western portion of the Project site (CDFW 2025). CDFW does not concur that Construction Measure (CM) BIO-3 is sufficient to avoid significant impacts and unauthorized take of GKR for the PG&E components of the Project. CM BIO-3 does not specify the methodology that will be used for GKR pre-construction surveys. Additionally, if occupied or potentially occupied GKR burrows are identified in the Project vicinity, it is recommended that work not proceed until CDFW is consulted, even if burrows can be avoided by 50 feet. To reduce impacts to less than significant, CDFW recommends the MND include the following measures:

> Recommended Mitigation Measure 1: GKR Protocol-Level Surveys
>
> CDFW recommends that focused protocol-level live trapping surveys be conducted in all areas of potentially suitable habitat and that a trapping plan for determining presence of GKR be submitted to and approved by CDFW prior to trapping efforts. The trapping plan should follow the U.S Fish and Wildlife Service "Survey Protocol for Determining Presence of San Joaquin Kangaroo Rats" (USFWS 2013).
>
> Recommended Mitigation Measure 2: GKR Consultation
>
> CDFW recommends that consultation with CDFW occur to discuss how to implement the Project and avoid take over the life of the Project, particularly within the western portion of the Project where known occurrences of GKR are documented. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Response A2-5
CM BIO-3 includes requirements to conduct preconstruction surveys for giant kangaroo rats, avoid occupied or potentially occupied burrows, and consult with USFWS and CDFW if burrows cannot be avoided. While implementation of this measure would result in identification and avoidance of giant kangaroo rats, the CPUC recognizes that additional detail regarding methods and the take authorization process would clarify the measure.

The impact discussion regarding CM BIO-3 on pages 3-98 and 3-99 of the Final IS/MND has been edited to note that the CM did not sufficiently describe the survey protocol for giant kangaroo rat, and CM BIO-3 has been replaced with a more effective construction measure, CM BIO-H, which incorporates the survey methodology and consultation recommendations from this comment as included on pages 3-104 and 3-105 of the Final IS/MND. No revision to the impact significance conclusion for special-status plants and wildlife is warranted; the impact to special-status species remains less than significant with mitigation. CM BIO-H would replace the CM BIO-3 for giant kangaroo rat and would be more effective in mitigating potential significant effects to the species.

The CPUC has determined these revisions do not require recirculation of the MND. Under State CEQA Guidelines Section 15073.5(c)(1), recirculation of an IS/MND is not required if mitigation measures are replaced with equal or more effective measures pursuant to State CEQA Guidelines Section 15074.1, which requires a public hearing for substitution of mitigation measures. Under State CEQA Guidelines Section 15073.5(c)(2), recirculation is also not required if new project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration that are not new avoidable significant effects.

As explained in the IS/MND (page 1-2 in Appendix 1), PG&E, which is not an applicant in this proceeding, has committed to certain construction measures to reduce impacts pertinent to PG&E project components below the level of significance. Here, the revisions to CM BIO-3 reflect project revisions that would result in a more effective construction measure. PG&E has agreed to incorporate revised CM BIO-3 in the form of CM BIO-H into the project. PG&E's agreement to implement CM BIO-H as revised in the Final IS/MND is included in the company's response to Data Request 4 dated June 6, 2025. Further, at its final approval hearing for the project, the CPUC will hear any comments related to revision or substitution of any CM or mitigation measure consistent with State CEQA Guidelines Section 15074.1(b)(1). Therefore, recirculation of the IS/MND is not required.

Comment A2-6

San Joaquin antelope squirrel

Similarly, CDFW does not concur that CM BIO-3 is sufficient to avoid significant impacts and unauthorized take of San Joaquin antelope squirrel (SJAS) for the PG&E components of the Project. The MND states that SJAS may occur in the Project site, and multiple nearby occurrences have been reported as close as two miles from the western-most portion of the Project site (CDFW 2025). If occupied or potentially occupied SJAS burrows are identified in the Project vicinity, it is recommended that work not proceed until CDFW is consulted, even if burrows can be avoided by 50 feet. To reduce impacts to less than significant, CDFW recommends the MND include the following measure:

> Recommended Mitigation Measure 3: SJAS Consultation
>
> CDFW recommends that consultation with CDFW occur to discuss how to implement the Project and avoid take over the life of the Project, specifically within the western portion of the Project that is adjacent to habitats with known occurrences of SJAS. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Response A2-6

CM BIO-3 contains survey requirements for San Joaquin antelope squirrel and requirements to consult with USFWS and CDFW if burrows cannot be avoided, and implementation of this measure would result in identification and avoidance of San Joaquin antelope squirrels. However, the CPUC recognizes that additional detail regarding methods and the take authorization process would clarify the measure. CM BIO-3 has been replaced with a more effective construction measure, CM BIO-H, which has been added to pages 3-104 and 3-105 to the Final IS/MND. CM BIO-H incorporates the consultation recommendations from this comment, and further defines the survey area for this species. No revision to the impact significance conclusion for special-status wildlife is warranted; the impact on special-status species remains less than significant with mitigation. Please refer to Response A2-5 regarding replacing measures with equal or more effective measures and revising the project in response to written or verbal comments on an IS/MND.

Comment A2-7

San Joaquin Kit Fox

The MND notes that San Joaquin kit fox (SJKF) has the potential to occur in the Project site, and SJKF occurrences are documented within and immediately adjacent to the Project site, including in disturbed/agricultural habitat (CDFW 2025). For the reasons stated below, CDFW does not concur that CM BIO-4 and Applicant-Proposed Measure (APM) BIO-8 are sufficient to reduce impacts to less than significant and avoid unauthorized take of SJKF. SJKF den in a variety of areas such as arid grassland and alkali scrub/shrub habitats in open areas with sandy soils (Grinnel et al. 1937), agricultural and fallow/ruderal habitat, and dry stream channels, and populations can fluctuate over time. Further, SJKF may be attracted to Project sites due to the type and level of ground-disturbing activities and the loose, friable soils resulting from intensive ground disturbance. Therefore, the area surveyed for SJKF should not be limited to only grassland habitat or areas surrounding grassland habitat, as proposed in CM BIO-4 and APM BIO-8. To ensure accurate detection of SJKF, CDFW recommends the MND include the following measure:

> Recommended Mitigation Measure 4: SJKF Pre-Construction Surveys
>
> CDFW recommends that a qualified biologist assess the presence/absence of SJKF by conducting focused surveys to detect SJKF and their sign in all Project sites, especially the Manning Substation site as well as other areas where grading and other substantial ground-disturbing activities are anticipated, and a 500-foot buffer of Project sites. CDFW advises conducting these surveys in all areas of potentially suitable habitat no less than 14 days and no more than 30 days prior to beginning of ground-disturbing activities.

CM BIO-4 also proposes hand-excavation of unoccupied SJKF dens. CDFW does not recommend the excavation of known SJKF dens without prior take authorization due to the potential for unauthorized take. Known dens include dens that are both currently in use and those that were used at any time in the past (i.e., unoccupied dens) (USFWS 2011). SJKF change dens often and are likely to return to an 'unoccupied' den in the future. Further, even dens that are occupied often show no evidence of use. As such, den removal may directly result in unauthorized take of SJKF, and implementation of CM BIO-4 may itself result in a potentially significant impact under CEQA. To avoid potentially significant impacts to SJKF, CDFW recommends the MND include the following mitigation measure:

> Recommended Mitigation Measure 5: SJKF Take Authorization
>
> As it is likely that SJKF are present in the Project vicinity, CDFW recommends the Project proponents pursue take authorization in advance of any Project activities through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) to comply with CESA, especially if excavation of SJKF dens continues to be proposed as part of the Project.

Lastly, SJKF will readily use pipes, culverts, shipping containers, portable buildings, and stacks of materials (e.g., I-beams, wooden boards) with spaces within or underneath them for denning (Cypher et al. 2023). CDFW recommends thoroughly inspecting all construction materials or structures with sufficient spaces for SJKF before these materials are used or moved in any way. To deter foxes from creating dens under construction materials, CDFW recommends elevating materials one foot or more off the ground using k-rails or similar structures.

Response A2-7

CM BIO-4 and APM BIO-8 include requirements to conduct preconstruction surveys for San Joaquin kit foxes, avoid occupied or potentially occupied burrows, and consult with USFWS and CDFW if burrows cannot be avoided. While implementation of these measures would result in identification and avoidance of San Joaquin kit foxes, the CPUC recognizes that additional detail regarding methods (including specific survey protocols) and the take authorization process would clarify the measure. The impact discussion regarding CM BIO-4 and APM BIO-8 on pages 3-97 and 3-98 of the Final IS/MND has been edited to note that the APM and CM did not sufficiently describe the survey protocol and consultation requirements for San Joaquin kit fox. Although APM BIO-8 and CM BIO-4 contain survey and consultation requirements for San Joaquin kit fox, these measures have been replaced by a more effective construction measure, CM BIO-J [PG&E] / Mitigation Measure BIO-9 [LSPGC], which has been added to the Final IS/MND. CM BIO-J [PG&E] / Mitigation Measure BIO-9 [LSPGC] incorporates the recommendations from this comment, and provides further details regarding survey methodology and agency consultation as provided on pages

3-105 and 3-106 of the Final IS/MND. No revision to the impact significance conclusion for special-status wildlife is warranted; the impact on special-status species remains less than significant with mitigation. PG&E has agreed to incorporate CM BIO-J [PG&E] / Mitigation Measure BIO-9 [LSPGC] into the project. PG&E's agreement to implement CM BIO-J [PG&E] / Mitigation Measure BIO-9 [LSPGC] as revised in the Final IS/MND is included in the company's response to Data Request 4 dated June 6, 2025. Please refer to Response A2-5 regarding replacing measures with equal or more effective measures and revising the project in response to written or verbal comments on an IS/MND.

Comment A2-8

Swainson's hawk

The MND states that Swainson's hawk (SWHA) may occur within the Project site and that suitable SWHA nesting and foraging habitat is present in and adjacent to the Project site. CDFW concurs with the portion of Construction Measure BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC] related to focused surveys for Swainson's hawk (SWHA) following the protocols developed by the SWHA Technical Advisory Committee (SWHA TAC 2000). CDFW recommends the entire survey methodology be implemented. However, a no-disturbance (and survey) buffer of ¼ mile, as proposed in this measure, is likely insufficient to reduce impacts to less than significant and avoid unauthorized take of SWHA. As such, CDFW recommends the MND include the following measures:

> Recommended Mitigation Measure 6: SWHA Avoidance Buffer
>
> If Project-specific activities will take place during the SWHA nesting season (i.e., March 1 through September 15), and active SWHA nests are present, CDFW recommends a minimum ½-mile no-disturbance buffer be delineated and maintained around each nest, regardless of whether it was detected by surveys or observed incidentally. These buffers would remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, to prevent nest abandonment and other take of SWHA as a result of Project activities.
>
> Recommended Mitigation Measure 7: SWHA Take Authorization
>
> CDFW recommends that in the event an active SWHA nest is detected, and a ½-mile no-disturbance buffer is not feasible, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Additionally, as SWHA foraging habitat is present within the Project site, CDFW recommends the MND include the following measure:

> Recommended Mitigation Measure 8: SWHA Foraging Habitat Mitigation
>
> CDFW recommends compensation for the loss of SWHA foraging habitat as described in CDFW's "Staff Report Regarding Mitigation for Impacts to Swainson's Hawks" (CDFG 1994) to reduce impacts to foraging habitat to less than significant. The Staff Report recommends that mitigation for habitat loss occur within a minimum distance of 10 miles from known nest sites. CDFW has the following recommendations based on the Staff Report:
>
> - For projects within 1 mile of an active nest tree, a minimum of 1 acre of habitat management (HM) land for each acre of development is advised.
> - For projects within 5 miles of an active nest but greater than 1 mile, a minimum of ¾ acre of HM land for each acre of development is advised.
> - For projects within 10 miles of an active nest tree but greater than 5 miles from an active nest tree, a minimum of ½ acre of HM land for each acre of development is advised.

Response A2-8

CM BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC] states that the protocol in *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory

Committee 2000) will be followed; therefore, additional explanation is not required regarding the protocol. The *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks* (CDFG 1994) recommends implementation of a 0.25-mile no-disturbance buffer around active Swainson's hawk nests; however, this comment indicates that CDFW is now recommending a 0.5-mile buffer. The no-disturbance buffer in CM BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC] on page 3-101 of the Final IS/MND has been revised to be 0.5 miles pursuant to recommendations in this comment.

The comment requests that the project compensate for impacts on Swainson's hawk foraging habitat consistent with the *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks* (CDFG 1994), which recommends that projects within 1, 5, and 10 miles of an active Swainson's hawk nest tree compensate for foraging habitat impacts. An active nest tree, per this guidance from CDFW, is a nest that has been active in 1 or more of the past 5 years. A review of the California Natural Diversity Database (which is noted in the 1994 CDFG guidance as the best available information source for Swainson's hawk occurrences) during preparation of the Final IS/MND revealed five documented Swainson's hawk nests within approximately 10 miles of the project alignment area; one of these occurrences was within 5 miles of the project alignment area (CNDDB 2025). The most recent of these occurrences were last documented in 2017 (three of the occurrences), which is 8 years ago, and not considered an active nest per the definition in CDFW's guidance. It is possible that some of these nests documented 8 to 25 years ago have been active in the past 5 years, as some nests are used for more than 1 year by a Swainson's hawk pair; however, new nests are often built every year (Bechard et al. 2020). Regardless, the analysis in the IS/MND is limited to the best available survey data, and this data does not currently indicate conclusively that there are active Swainson's hawk nests within 10 miles of the project alignment area.

As described in Chapter 2 of the Final IS/MND, under the heading "2.8.3 Work Disturbance Areas," the total acreage of permanent disturbance for the project would be 21.8 acres. Most of this permanent disturbance footprint and the associated loss of Swainson's hawk foraging habitat would be associated with the Manning Substation (i.e., 16.1 acres). Apart from the Manning Substation site, permanent disturbance areas would have small footprints along the linear project alignment area, and these disturbance areas would not change the overall character of the project alignment area such that Swainson's hawk foraging habitat would be affected.

Further, while the Manning Substation site is located west of I-5, near an undeveloped portion of the project alignment area (characterized in the IS/MND as *Amsinckia–Phacelia* spp. herbaceous and *Avena* spp.–*Bromus* spp. herbaceous seminatural land cover), the Manning Substation site itself is characterized as "disturbed" (see Biological Resources Technical Report (BRTR), Appendix E of Appendix 1). Disturbed land cover, as described in the BRTR, lacks vegetation and includes all dirt roads, unmaintained paved roads, cleared areas, barren pasturelands, and agricultural plots with no evidence of recent activity. The 1994 CDFG guidance states that vegetation types or agricultural crops that are considered small mammal and insect foraging habitat for Swainson's hawks are alfalfa; fallow fields; beet, tomato, and other low-growing row or field crops; dry-land and irrigated pasture; rice land; and cereal grain crops (CDFG 1994). While the disturbed land cover on the Manning Substation site may provide some marginal or low-quality foraging opportunities for Swainson's hawks, it does not contain the land cover types characteristic of Swainson's hawk foraging habitat described above, and suitable foraging habitat (natural vegetation and agricultural) is present in the region surrounding the site.

Because of the lack of documented modern (i.e., more recent than 5 years) Swainson's hawk nesting occurrences within 1, 5, or 10 miles of the project alignment area; the linear nature of the project alignment area; the relatively small permanent disturbance area; and the low quality of the foraging habitat within the permanent disturbance area (the Manning Substation site), impacts related to loss of Swainson's hawk foraging habitat would be minimal and less than significant under CEQA, Therefore, compensatory mitigation for these impacts would not be required.

Comment A2-9

Western burrowing owl

The MND states that BUOW has the potential to occur within the Project site, which contains potentially suitable nesting habitat. The California Fish and Game Commission approved western burrowing owl (BUOW) as a candidate for potential listing as a protected species under CESA on October 10, 2024, and published these findings in the California Regulatory Notice Register (Notice Register) on October 25, 2024. As such, BUOW is now a candidate

under CESA and receives the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085).

CDFW does not concur that Construction Measure BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC] is sufficient to avoid significant impacts and unauthorized take of BUOW. CDFW concurs that focused surveys should be conducted specifically following the 2012 Staff Report on Burrowing Owl Mitigation (Staff Report; CDFG 2012); however, the no-disturbance buffers proposed in this measure do not currently reflect what is recommended in the Staff Report. As such, CDFW recommends the MND include the following measures:

Recommended Mitigation Measure 9: BUOW Avoidance Buffer

Should a BUOW or known BUOW den (active or inactive) be detected, either during pre-construction surveys or construction activities, CDFW recommends that no-disturbance buffers, as outlined in the Staff Report and copied below, be implemented prior to and during any ground-disturbing activities. CDFW also recommends that these buffers be implemented for both wintering and breeding BUOW.

Location *	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1–Aug 15	200 m**	500 m	500 m
Nesting sites	Aug 16–Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16–Mar 31	50 m	100 m	500 m

* Buffers should be implemented for both wintering and breeding BUOW.

** meters (m)

Recommended Mitigation Measure 10: BUOW Take Authorization

If a BUOW or known BUOW den (active or inactive) is detected, and the nodisturbance buffers outlined in the Staff Report are not feasible, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Additionally, while CDFW understands that Construction Measure BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC] supersedes and replaces other APMs and CMs for BUOW, CDFW stresses that passive relocation of BUOW, as proposed in CM BIO-7, should not occur without prior take authorization from CDFW. Passive relocation is likely to directly result in unauthorized take of the species, and implementation of the measure could itself result in a potentially significant impact under CEQA.

Lastly, CDFW notes that AMM-18 within PG&E's San Joaquin Valley Habitat Conservation Plan (SJVHCP) is no longer sufficient to avoid unauthorized take of BUOW during PG&E's operation and maintenance activities associated with this Project or any other project. CDFW recommends that Construction Measure BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC], with the above changes incorporated, supersede and replace AMM-18 as well.

Response A2-9

The Final IS/MND identifies burrowing owl as a candidate for listing under CESA (see Table 3.4-2, page 3-76). CM BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC] on pages 3-102 and 3-103 of the Final IS/MND requires a minimum no-disturbance buffer during the nonbreeding season of 50 meters and a minimum no-disturbance buffer of 500 meters during the breeding season. These buffers are consistent (for nonbreeding) or more protective (for breeding) than described in the CDFW 2012 Staff Report and the above comment; therefore, no edits were made to the buffers in this measure. CM BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC] also does not outline steps for obtaining an ITP for take of burrowing owls because it fully prohibits impacts on burrows and requires implementation of no-disturbance buffers regardless of feasibility to reduce impacts to less than significant under CEQA. Therefore, this recommendation is not necessary or more effective and, therefore, was not included. The CPUC acknowledges that SJVHCP AMM-18 may no longer avoid take of burrowing owls due to the recent designation of

the species as a candidate for listing under CESA. CM BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC] on pages 3-102 and 3-103 of the Final IS/MND has been revised to require consultation with CDFW regarding no-disturbance buffer sizes for operation and maintenance of PG&E components as recommended in the comment.

Comment A2-10

Crotch's bumble bee

As stated in the MND, Crotch's bumble bee (CBB) may be present within the Project site, which contains potentially suitable CBB nesting and foraging habitat. Multiple recent CBB occurrences are documented within five miles of the Project site (CDFW 2025). CDFW does not concur that APM BIO-16 and CM BIO-G [PG&E] are sufficient to avoid significant impacts and unauthorized take of CBB for the LSPGC and PG&E components of the Project, respectively. APM BIO-16 does not specify the methodology that will be used for CBB pre-construction surveys and limits survey areas to grassland habitats (and areas surrounding grassland habitats), while CM BIO-G [PG&E] only requires surveys if initial ground-disturbing work could not take place between August 15 and March 15. To reduce impacts to less than significant, CDFW recommends the MND include the following measures for all components of the Project:

> Recommended Mitigation Measure 11: CBB Habitat Assessment
>
> CDFW recommends a qualified biologist conduct a habitat assessment to determine if the entire Project site and the immediate surrounding vicinity contain habitat suitable to support CBB. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment.
>
> Recommended Mitigation Measure 12: CBB Surveys Prior to Construction
>
> If potentially suitable habitat is identified, regardless of what time of year Project activities will be conducted, CDFW recommends that a qualified biologist conduct focused surveys for CBB and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023).
>
> Recommended Mitigation Measure 13: CBB Avoidance
>
> If CBB is detected, CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB prior to or during Project implementation warrants consultation with CDFW to discuss how to avoid take.
>
> Recommended Mitigation Measure 14: CBB Take Authorization
>
> If take cannot be avoided, CDFW recommends acquiring an ITP pursuant to Fish and Game Code Section 2081(b), prior to initiating ground-disturbing activities.

Response A2-10

While APMs BIO-16 and BIO-17, which apply to LSPGC components of the project, contain survey requirements for Crotch's bumble bees, and implementation of these measures would likely result in identification of bumble bees, the CPUC recognizes that additional detail regarding methods and reference of the most recent survey protocol published by CDFW would clarify the measure. CM BIO-G [PG&E] on pages 3-103 and 3-104 of the Final IS/MND (which already applies to PG&E components) has been revised to also replace APMs BIO-16 and BIO-17 for LSPGC components as recommended in this comment, to provide consistency with the most recent survey requirements published by CDFW, and to apply a more effective measure. No revision to the impact significance conclusion for special-status wildlife is warranted; the impact on special-status species remains less than significant with mitigation. Please refer to Response A2-5 regarding replacing measures with equal or more effective measures in an IS/MND.

As described on pages 3-96 and 3-97 of the Final IS/MND, nesting and foraging habitats potentially suitable for Crotch's bumble bees are present in the project alignment area. Pursuant to the best available science regarding bumble bees, including bumble bees in California, overwintering habitat consists of woodlands and woodland or

forest edges, where leaf or needle litter is present (CDFW 2023; USFWS 2021; Williams et al. 2014; Williams et al. 2019). Bumble bees in California have been documented overwintering under 1–2 inches of duff, between leaf/needle litter and mineral soil (Williams et al. 2014). The project alignment area does not contain woodland habitat or areas where leaf/needle litter could accumulate; therefore, this life history stage was not considered in the impact analysis. Because overwintering habitat is not present in the project alignment area, and Crotch's bumble bees have potential to occur only during the colony active period, surveys during the overwintering period are not likely to result in detection of the species. Implementation of a limited operating period during the colony active period, if feasible, would avoid take of individual Crotch's bumble bees.

CM BIO-G [PG&E] on pages 3-103 and 3-104 of the Final IS/MND includes a requirement for a habitat assessment pursuant to *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023); therefore, this recommended addition is not necessary or more effective, and was not included. CM BIO-G [PG&E] also includes requirements for implementing avoidance buffers around active colonies and nearby foraging habitat, as well as notification of CDFW if Crotch's bumble bees are detected. Therefore, the recommended measure regarding avoidance buffers is not necessary or more effective, and was not included. Furthermore, *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023) recommends implementation of avoidance buffers around active colonies, not around all habitat potentially suitable for bees, as suggested in this comment. Therefore, CM BIO-G [PG&E] is consistent with the current statewide guidance from CDFW regarding Crotch's bumble bees. CM BIO-G [PG&E] also includes a step for obtaining an ITP under Section 2081 of California Fish and Game Code if take cannot be avoided; therefore, this recommended measure was also not included.

Comment A2-11

American badger

The MND notes that American badger (AMBA) may occur within the Project site, however, AMBA is not included in any of the APMs or CMs listed in the MND. CDFW recommends incorporating AMBA into APM BIO-5 (Pre-Construction Wildlife and Burrow Surveys) and APM BIO-10 (Burrow and Den Avoidance), as well as ensuring potential impacts to AMBA are sufficiently mitigated for in the PG&E portion of the Project. Additionally, CDFW recommends that a qualified biologist conduct focused surveys for AMBA, as well as their requisite habitat features, to evaluate potential impacts resulting from ground disturbance. Avoidance whenever possible is encouraged via delineation of a 50-foot no-disturbance buffer around burrows. CDFW advises that any individuals observed be allowed to leave the Project site of their own volition.

Response A2-11

APM BIO-6 (which the comment misidentified as APM BIO-5) and APM BIO-10 require preconstruction surveys for special-status wildlife and burrows and dens occupied or potentially occupied by these species, and avoidance of occupied or potentially occupied dens. While these measures would result in identification and avoidance of American badgers, the CPUC recognizes that additional detail regarding methods and avoidance would clarify and improve the existing measure. To incorporate the recommendations from this comment and to further clarify the requirements of LSPGC APMs, CM BIO-I [PG&E]/Mitigation Measure BIO-8 [LSPGC] has been added on page 3-105 of the Final IS/MND to increase the effectiveness of APMs BIO-6 and BIO-10. The measure would supplement APMs BIO-6 and BIO-10 (for LSPGC project components) and would also apply to PG&E project components to require specific focused surveys and avoidance for American badgers. No revision to the impact significance conclusion for special-status wildlife is warranted; the impact on special-status species remains less than significant with mitigation. Please refer to Response A2-5 regarding increasing the effectiveness of measures and revising the project in response to written or verbal comments on an IS/MND. PG&E has agreed to incorporate CM BIO-I into the project. PG&E's agreement to implement CM BIO-I as revised in the Final IS/MND is included in the company's response to Data Request 4 dated June 6, 2025.

Comment A2-12

Special-status plant species

The MND identifies 10 special-status plant species with the potential to occur in the Project site. CDFW concurs that special-status plant surveys should follow the methodology within the CDFW Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018), as proposed in Construction Measure BIO-A [PG&E] / Mitigation Measure BIO-1 [LSPGC]. However, CDFW is concerned that a protective buffer of only 20 feet may not sufficiently avoid significant impacts to special-status plants if they are detected. CDFW recommends special-status plant species be avoided whenever possible by delineating and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species.

Further, the MND notes that special-status plant species may be associated with some agricultural habitats in the Project site in addition to more typical grassland habitats. For this reason, CDFW asserts the importance of including these agricultural habitats in special-status plant surveys to detect all individuals that may be present with the Project site.

Response A2-12

The 20-foot buffer requirement in CM BIO-A [PG&E] / Mitigation Measure BIO-1 [LSPGC] may provide sufficient protection for some special-status plants; however, the CPUC recognizes that a 50-foot buffer would be more effective in most cases. CM BIO-A [PG&E] / Mitigation Measure BIO-1 [LSPGC] on pages 3-95 and 3-96 of the Final IS/MND has been revised to increase the buffer size from 20 feet to 50 feet to improve the effectiveness of the measure according to the recommendations in this comment. This measure requires surveys for special-status plants to be implemented in habitats determined to be suitable for special-status plants, which includes certain agricultural land cover types, as noted in Table 3.4-1 on pages 3-70 to 3-74 of the Final IS/MND. Therefore, clarification regarding the survey area is not required.

Comment A2-13

Editorial Comments and/or Suggestions

Cumulative impacts: Currently, the MND includes a very limited discussion of cumulative impacts to biological resources and does not adequately analyze cumulative impacts to specific resources. Given the relatively large number of existing and probable future projects within the Project vicinity, and the likely increase in development and/or projects that would result from completion of the Project, CDFW recommends that a cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the Project. This analysis should include impacts that are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the Project, even if those impacts are relatively small (i.e., less than significant). CDFW recommends cumulative impacts be analyzed for the species below using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the Project. An appropriate resource study area should be identified and mapped for each resource being analyzed and utilized for this analysis. CDFW recommends a scientifically sound cumulative impacts analysis be conducted and the MND be recirculated with this updated analysis for the following species: giant kangaroo rat, San Joaquin antelope squirrel, San Joaquin kit fox, Swainson's hawk, tricolored blackbird (*Agelaius tricolor*), blunt-nosed leopard lizard (*Gambelia sila*), golden eagle (*Aquila chrysaetos*), western burrowing owl, Crotch's bumble bee, American badger, Tulare grasshopper mouse (*Onychomys torridus tularensis*), loggerhead shrike (*Lanius ludovicianus*), mountain plover (*Charadrius montanus*), northern harrier (*Circus hudsonius*), short-eared owl (*Asio flammeus*), California glossy snake (*Arizona elegans*), coast horned lizard (*Phrynosoma coronatum*), San Joaquin coachwhip (*Masticophis flagellum ruddocki*), western spadefoot (*Spea hammondii*), San Joaquin woolly-threads, monarch butterfly (*Danaus plexippus*), and nesting birds. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

Response A2-13

State CEQA Guidelines Section 15063 includes the contents required for an initial study. The project IS/MND was prepared consistent with the required contents pursuant to State CEQA Guidelines Section 15063(d), which includes a project description, environmental setting, identification of environmental effects, mitigation, and project consistency with applicable plans. The IS/MND addresses cumulative environmental effects on page 2-285 of the Final IS/MND with evidence to support the findings. As discussed therein, a combination of APMs, CMs, and mitigation measures would require surveys and avoidance of species if found on or near the project alignment area. Page 2-285 of the Final IS/MND has been drafted consistent with Section 15065 of the State CEQA Guidelines to address mandatory findings of significance, including a discussion of cumulative impacts consistent with State CEQA Guidelines Section 15065(a)(3). Furthermore, energy projects are implemented in response to planned development, and are not growth inducing as suggested in the comment. Page 2-285 of the Final IS/MND has been revised to include the replacement measures proposed for biological resources and reference the past and future projects and conditions that comprise the cumulative scenario.

Comment A2-14

Federally listed species: CDFW recommends consulting with the U.S. Fish and Wildlife Service (USFWS) regarding potential impacts to federally listed species including, but not limited to, the giant kangaroo rat, San Joaquin kit fox, blunt-nosed leopard lizard, and San Joaquin woolly-threads. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any Project activities.

Response A2-14

Mitigation measures in the IS/MND that pertain to species listed under ESA, and thus under the jurisdiction of USFWS, all include steps to consult with USFWS if take cannot be avoided. Furthermore, LSPGC and PG&E are required to comply with applicable laws, including ESA, regardless of CPUC-imposed requirements under CEQA. These administrative remarks are acknowledged for the record and will be provided to the decision makers for consideration.

Comment A2-15

Lake and Streambed Alteration: The MND identifies four ephemeral streams and two agricultural ditches within the Project site. At least some of these features are likely subject to CDFW's regulatory authority pursuant to Fish and Game Code section 1600 et seq. Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's website (https://wildlife.ca.gov/Conservation/LSA) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

Response A2-15

CM BIO-J (renamed BIO-K in the Final IS/MND) / Mitigation Measure BIO-9 (renamed BIO-10 in the Final IS/MND) on pages 3-108 and 3-109 of the Final IS/MND requires LSPGC or PG&E or both to notify CDFW before commencing activity that may divert the natural flow or otherwise alter the bed or bank of any 1602 jurisdictional waterway, and for LSPGC or PG&E or both to obtain an LSAA if determined to be necessary. Furthermore, the Final IS/MND assesses the

project's potential impacts on streams and ditches potentially under the jurisdiction of CDFW sufficient to provide CEQA compliance for CDFW to issue an LSAA, if required. These administrative remarks are acknowledged for the record and will be forwarded to the decision makers for consideration.

Comment A2-16

Nesting birds: CDFW encourages that Project ground-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified biologist conduct a pre-construction survey for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected, either directly or indirectly, by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist establish a behavioral baseline of all identified nests. Once Project activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

Currently, the MND specifies no-disturbance buffers of only 100 feet for non-raptor special-status birds and 20 feet for other native birds (CM BIO-E / MM BIO-7). If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of all non-listed bird species (and a 500-foot no-disturbance buffer around active nests of non-listed raptors). These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is a compelling biological or ecological reason to do so, such as when the Project site would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Response A2-16

CM BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC] on pages 3-101 and 3-102 of the Final IS/MND requires nesting bird surveys no more than 10 days prior to project activities that would occur during the nesting bird season (February 1 to September 15) and specifies large survey buffers for Swainson's hawks, other raptors, and other native birds. This measure also includes a provision for reducing the size of the no-disturbance buffer if a biological monitor is present, which is consistent with this recommendation. The no-disturbance buffer requirement in CM BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC] would provide sufficient protection for special-status birds in most cases; however, the CPUC recognizes that a 250-foot buffer around the nests of non-raptor special-status birds would be more effective in most cases. CM BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC] on pages 3-101 and 3-102 of the Final IS/MND has been revised to increase the no-disturbance buffer size around nests of non-raptor special-status bird species to 250 feet for LSPGC project components, according to the recommendation in this comment. However, a buffer of 250 feet surrounding the nests of common, non-raptor species (for this project, most likely common passerines) is unnecessary to prevent disturbance of these nests. CM BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC] on pages 3-101 and 3-102 of the Final IS/MND has been updated to state that no-disturbance buffer sizes for common, non-raptor species may be increased at the discretion of the CPUC-approved biologist depending on factors including species, nest height, topography, existing vegetative or other barriers between the nest and project activities, and disturbance level surrounding the nest.

Comment A2-17
ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Databased (CNDDB). The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

Response A2-17
PG&E and LSPGC are responsible for reporting special-status species detected on PG&E or LSPGC property or rights-of-way during surveys conducted for the project.

Comment A2-18
FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees may be necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

Response A2-18
These administrative remarks are acknowledged for the record. The CPUC will pay filing fees as required, and further response is not warranted.

Comment A2-19
CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the CPUC in identifying and mitigating Project impacts on biological resources. If you have any questions, please contact Amanda Canepa, Senior Environmental Scientist (Specialist), at the address provided on this letterhead, by telephone at (805) 746-0721 or by electronic mail at Amanda.Canepa@wildlife.ca.gov.

Response A2-19
These closing remarks are acknowledged for the record, and further response is not warranted.

Letter A3 Fresno County

Arianna Brown, Planner
April 30, 2025

Comment A3-1
The County of Fresno appreciates the opportunity to review and comment on the proposed construction and operation of a new Manning Substation and a new approximately 11.5-mile overhead double-circuit 230 kilovolt transmission line that would extend from the proposed Manning Substation to interconnect with the PG&E Tranquility Switching Station.

The documents received for this review were circulated to our various Fresno County Public Works and Planning divisions. See comments below.

Response A3-1
These introductory remarks are acknowledged for the record.

Comment A3-2
Fresno County Fire Protection District

All applications SHALL comply with California Code of Regulations Title 24 – Fire Code. Prior to receiving your FCFPD conditions of approval for your project, you must submit construction plans to the County of Fresno Public Works and Planning and FCFPD for review. It is the Applicants Responsibility to deliver a minimum of two (2) sets of plans to the FCFPD.

Response A3-1
The California Code of Regulations Title 24 Part 9, Fire Code, is summarized on page 3-276 of the Final IS/MND. The project would comply with applicable portions of the Fire Code. Requirements for submission of construction plans to the County of Fresno Public Works and Planning and Fresno County Fire Protection District (FCFPD) for review are acknowledged for the record and will be provided to LSPGC, the project applicant.

Comment A3-3
Your Project/Development may be required to annex into the into Community Facilities District No. 2010-01 of the Fresno County Fire Protection District. Project/Developments included: Single Family Residential (SFR), SFR Properties subdivided into three (3) or more housing units, Multi-Family Residential (MFR) Property, Commercial Property, Industrial Property, and/or Office Property.

Response A3-3
The project is an electrical infrastructure project and does not fit into any of the categories of projects that require annexation into the Community Facilities District No. 2010-01 of the FCFPD.

Comment A3-4
Project/Developments will be subject to the requirements of the current Fire Code and Building Code when a building permit or certificate of occupancy is sought.

Response A3-4
The project would not require a building permit or certificate of occupancy because the project is an electrical infrastructure project and does not include structures intended for dwelling.

Comment A3-4
Before plans are submitted to the Fresno County Fire Protection District, please visit our website at www.fresnocountyfire.org and complete the Fire Permit Application to submit with your plans.

Please contact the Fresno County Fire Protection District (FCFPD) at (559) 319-0400 to schedule an over the counter meeting to receive specific requirements for your project. Failure to schedule an appointment with the FCFPD will affect your ability to obtain final approval for your project.

Response A3-4
These remarks are acknowledged for the record and will be provided to LSPGC, the project applicant.

Comment A3-5
Fresno County Roads and Operation

1) Existing County maintained roads in the area will be negatively impacted by the construction phase of this project. Roadway improvements to Manning Avenue will be required from the existing end of pavement extending west to the end of County maintained road limits (approximately 0.9 miles) at Brannon Avenue. Manning Avenue improvements include paving the existing dirt roadway to include two (2) twelve (12) foot lanes.

Response A3-5
As included in the Project Description on page 2-11 of the Final IS/MND, "Incidental damage to existing roads is not expected from the project. Should incidental road damage occur, the roads would be restored to pre-construction

conditions or better as required by applicable permits and/or landowner agreements." Therefore, any existing County-maintained roads, including Manning Avenue, would be restored following project construction.

Comment A3-6
2) At the west end of the paving limits at Brannon Avenue, the County maintained section of Manning Avenue will dead-end. A paved cul-de-sac in accordance with County Improvement Standards must be installed to accommodate turnaround movements for the dead-end.

Response A3-6
As included in the Project Description on page 2-29 of the Final IS/MND, "An existing dirt road would be upgraded to provide access to the proposed Manning Substation; specifically, the turning radius at the intersection of Manning Avenue and the unnamed private road that continues south from the intersection of South Brannon Avenue and Manning Avenue would be widened on the southeast corner of the intersection to allow larger vehicles to safely turn onto the unnamed private road. In addition, the unnamed private road would be widened to approximately 20 feet from its intersection with Manning Avenue to the proposed substation driveway." Therefore, the western portion of Manning Avenue would be expanded and upgraded to accommodate vehicle turnaround movements, and a cul-de-sac would not be necessary.

Comment A3-7
3) Engineered plans for the roadway improvements must be submitted for review and approval prior to permit issuance for any improvements to County maintained roads.

Response A3-7
This comment is acknowledged for the record and will be provided to LSPGC, the project applicant. No further response is warranted.

Comment A3-8
4) Right of way of Manning Avenue from Brannon Avenue to Custer Alignment should be perfected at a width of 60 feet.

Response A3-8
This comment is acknowledged and would be implemented during project construction. As described in the project description on page 2-28 of the Final IS/MND, new ROW would be secured for the project as needed, which could be 60 feet as indicated by the County, and temporary construction easements would be required for temporary construction areas. As shown in Table 2-4 on page 2-29 of the Final IS/MND, new ROW would not be required for the Manning Substation. Therefore, the Manning Avenue ROW would be maintained.

2.3.2 Organizations

Letter O1 Pacific Gas and Electric

Doug Edwards, Principal Land Planner
April 17, 2025

Comment O1-1
Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the IS/MND for the Manning 500/230 kV Substation Project. In addition to minor general comments, PG&E includes updated project design and construction details of the PG&E components of the larger project. For your convenience, each of the comments references the relevant section, page, and paragraph of the IS/MND.

Response O1-1
These introductory remarks are acknowledged for the record and will be provided to the decision makers for consideration.

Comment O1-2
SECTION 1.1 INTRODUCTION AND REGULATORY GUIDANCE

Page 1-1, Paragraph 1
Please add the following text to clarify that the NOC will be applicable to the transmission line components of the PG&E scope.

While LSPGC is the project applicant, the PG&E components are analyzed alongside the LSPGC components in this California Environmental Quality Act (CEQA) document prepared for the project. Following certification of this CEQA document, PG&E would file its own separate Notice of Construction under a General Order (GO) 131-E Section III.B exemption for construction of the PG&E transmission line facilities necessary to interconnect the project. This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the CPUC to evaluate potential environmental effects resulting from both the proposed LSPGC facilities and the proposed PG&E facilities. Section 2 "Project Description" presents detailed project information. This IS/MND includes applicant-proposed measures from LSPGC, construction measures from PG&E, and measures developed to address impacts from LSPGC's scope of work and PG&E's scope of work, including monitoring and/or reporting obligations for LSPGC and PG&E.

Response O1-2
Page 1-1 of the Final IS/MND has been revised with the additional text to clarify that the notice of construction (NOC) will be applicable to the transmission line components of the PG&E scope. See Chapter 3, which provides the revised text. These revisions provide additional clarification, and changes to the analysis or conclusions in the Final IS/MND are not required.

Comment O1-3
Page 1-1, Paragraph 3
Please add the following language to clarify that PG&E consulted with CPUC.

In consultation with the CPUC, PG&E has determined that looping (i.e., interconnecting) the existing lines into the new substation would constitute "extensions" of existing transmission facilities pursuant to Section III.A of GO 131-E, while reconductoring the lines would constitute "modifications" of the existing transmission facilities. Therefore, PG&E plans to proceed to file its Notice of Construction under GO 131-E Section III.B instead of filing a separate application

Response O1-3
Page 1-1 of the Final IS/MND has been revised with the additional text to clarify that PG&E consulted with the CPUC. See Chapter 3, which provides the revised text. These revisions provide additional clarification, and changes to the analysis or conclusions in the Final IS/MND are not required.

Comment O1-4
Page 1-2, Paragraph 2
Comment regarding PG&E agreement to implement construction measures identified in the IS/MND.

PG&E agrees to implement the construction measures identified in each technical section of the Environmental Checklist.

Response O1-4
PG&E's agreement is acknowledged for the record. If the project is approved, the construction measures will be included in the project mitigation monitoring, compliance, and reporting program (MMCRP), and the CPUC and its consultant will monitor construction of PG&E's portions of the project pursuant to the MMCRP. This comment is noted for the record and will be provided to the decision makers for consideration. PG&E's agreement to implement measures as revised in the Final IS/MND is included in the company's response to Data Request 4 dated June 6, 2025.

Comment O1-5
SECTION 2.6.2 PROPOSED PG&E FACILITIES
500 KV INTERCONNECTIONS (Page 2-17)

Please edit the structure counts to reflect design adjustments.

As part of the project, PG&E would extend its existing Los Banos-Midway #2 500 kV and Los Banos-Gates #1 500 kV transmission lines to the Manning Substation with an approximately 0.7-mile-long interconnection corridor and 1.1-mile-long interconnection corridor, respectively (each interconnection corridor would contain two lines). These two new interconnection lines would be installed as two corridors: one with up to approximately ~~10~~12 lattice steel towers (LST), and the other ~~with up to~~ approximately ~~12~~10 TSP structures, as shown in Appendix A, Figures 2 through 4.

Response O1-5
Page 2-19 of the Final IS/MND has been revised with the additional text to reflect design adjustment. See Chapter 3, which provides the revised text. These revisions reflect minor design adjustments, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O1-6
230 KV AND 115 KV STRUCTURE RAISES (Page 2-18)

Please incorporate the following design adjustments.
Between the existing Panoche-Tranquillity Switching Station #1 and #2 230 kV transmission line, the Gates-Panoche 230 kV #1 and #2 230 kV transmission line and the Panoche-Excelsior 115 kV #1 and #2 transmission line would be raised to allow the proposed LSPGC 230 kV transmission line and PG&E 230 kV Interconnections to maintain proper ground clearance at the crossing. At the location of the crossing, approximately five structures on each existing line would be replaced with approximately five new TSP structures per line (Appendix A, Figures 10 and 11). TSP structures would have a maximum height of 199 feet with approximately 8 to 12-foot-diameter foundations. Approximately 3 distribution poles near this location may need to be replaced within PG&E's existing right-of-way to accommodate the OPGW/distribution conflict.

Response O1-6
Page 2-20 of the Final IS/MND has been revised with the additional text to reflect design adjustments. See Chapter 3, which provides the revised text. These revisions reflect minor design adjustments, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O1-7
PANOCHE SUBSTATION MODIFICATION

Adjacent to PG&E's existing Panoche Substation, the existing Panoche-Tranquillity Switching Station #1 and #2 230 kV transmission line, Gates-Panoche #1 and #2 230 kV transmission line, the Las Aguilas-Panoche #1 230 kV transmission line, and the Panoche-Panoche Energy Center 230kV transmission line would be re-routed into the new breaker-and-a-half configuration inside the Panoche Substation (Appendix A, Figure 19). One span of fiber approximately 400 feet into the east side of the substation may need to be undergrounded depending on final design considerations. Approximately two temporary structures and approximately seven new TSP structures would be installed to support the line re-routes. TSP structures would be approximately 120- to 160-feet tall with approximately 3- to 12-foot-diameter foundations. The temporary structure would have a diameter of approximately 3 feet and would be direct buried at a typical depth of 14 feet below ground. The permanent TSPs would be installed on concrete pier foundations each with an approximately 12-foot diameter and a typical depth of 40 feet below ground with an approximate height of 160 feet above ground (Figure 2-8). Approximately five existing structures would be removed and approximately one would require foundation modification as part of the re-routes.

Response O1-7
Page 2-20 of the Final IS/MND has been revised with the additional text to reflect design adjustments for the Panoche Substation. See Chapter 3, which provides the revised text. These revisions reflect minor design adjustments, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O1-8
Please modify Project Mapbook (Page 18) to identify the minor adjustment of a structure location closer to the substation, the underground fiber, and the foundation modification shown below.

Response O1-8
Page 2-20 of the Final IS/MND has been revised with the additional text to reflect design adjustments for the Panoche Substation. See Chapter 3. See Chapter 3, which provides the revised text. These revisions reflect minor design adjustments, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O1-9
500KV TRANSPOSITION STRUCTURES (Page 2-18)

Please incorporate the following design information related to the transposition structures.

Transposition structures would be installed approximately 25 miles north of the proposed LSPGC Manning Substation (existing tower on PG&E's existing Los Banos-Midway #2 500 kV Transmission Line located at approximately 36°52'11.39"N, 120°52'46.63"W and existing tower on Los Banos-Gates #1 500 kV Transmission Line located at approximately 36°52'11.39"N, 120°52'46.63"W). Approximately two new three-pole dead-end TSP transposition structures would be inserted within the current ROW by replacing each of the existing lattice steel structures listed above (6 new TSPs total). Each transposition structure would have an approximate maximum height of 145 feet tall with a foundation diameter of approximately twelve feet.

One existing transposition structure (currently composed of two lattice steel poles) on the Los Banos-Midway #2 500kV Transmission Line approximately 15 miles south of the proposed LSPGC Manning Substation would be removed (the existing transposition lattice poles are located at approximately 36.435158°, -120.420808° and 36.435027°, -120.421060°). Additionally, both of the adjacent lattice steel structures to the north and to the south will be replaced with new 3 pole TSP structures (located at 36.435942°, -120.421706° to the north and 36.433514°, -120.419509° to the south). This scope will require grading a crane pad approximately 150'x150' at each existing structure

Response O1-9
Pages 2-20 and 2-21 of the Final IS/MND have been revised with the additional text to reflect design adjustments for more specific locations of transposition structures. See Chapter 3, which provides the revised text. These revisions reflect design adjustments that would occur in areas already analyzed for development as part of the project, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O1-10
TRANSMISSION GAS LINE (Page 2-18)

Please add section with the following information related to the installation of a gas transmission line monitoring equipment require to support the project.

Based on the result of an AC Interference study, PG&E must install monitoring equipment on the pipelines in the vicinity of the project to ensure safe operation of both the electric and gas line facilities. The approximate Alternating Current Coupon Test Station (CTS) location is (36°36'0.15"N, 120°31'45.33"W). Approximately 40-feet-long wire/conduits will be trenched in underground to connect the CTS cabinet located in between the pipelines to each of PG&E's two adjacent gas transmission pipelines for a total of 80 feet of new underground wire/conduit. The CTS cabinet may include bollards for protection.

Response O1-10
Page 2-21 of the Final IS/MND has been revised with the additional text to reflect the need for safe operation of facilities. See Chapter 3, which provides the revised text. The monitoring equipment would occur between PG&E's existing two adjacent gas transmission pipelines in areas that have previously been disturbed, and new features would be located underground. Revisions would not require updates to any resource areas discussed in the Final IS/MND. These revisions reflect minor design adjustments, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O1-11
SECTION 2.7 LAND OWNERSHIP, RIGHTS-OF-WAY AND EASEMENTS

Please add the following language related to land rights.

Page 2-24
PG&E would secure new rights for installation of the PG&E 500-kV Interconnections, PG&E 230-kV Interconnections, PG&E Panoche Substation Interconnection Modifications, ~~and~~ PG&E 12 kV distribution line, and any other required project facilities by negotiating agreements with each landowner. There are not any existing structures or known development restrictions that would conflict with securing new rights. ~~No development restrictions or existing structures are located within the new easement locations.~~ As described previously, PG&E may need to modify its existing easements to accommodate the PG&E 230-kV Reconductoring.

Page 2-25
LSPGC and PG&E would seek to obtain easements that would allow for the removal of trees anywhere within and adjacent to the easement that could pose a threat to the lines or adjacent electrical infrastructure.

Response O1-11
Pages 2-28 and 2-29 of the Final IS/MND have been revised with the additional text to reflect project adjustments for land ownership. See Chapter 3, which provides the revised text. These revisions reflect minor design adjustments, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O1-12
SECTION 2.8 PROJECT CONSTRUCTION

Section 2.8.1 Construction Access (Page 2-25)

Please add the following language related to construction access.

Where existing access is not available and surface conditions are suitable, approximately 16-foot-wide temporary access roads would be established during construction to access temporary construction areas (Appendix A). Access routes may be adjusted slightly to address site specific conditions, minimize impacts, and accommodate landowner preferences. Grading and/or road base placement would not occur on the temporary access roads unless required for delivery of equipment. To allow for wet-season work, ~~During winter months,~~ PG&E may weatherize access routes with ~~apply~~ heavy duty interlocking panels or gravel on roads for access.

Response O1-12
Pages 2-29 and 2-30 of the Final IS/MND have been revised with the additional text to reflect project adjustments to construction access. See Chapter 3, which provides the revised text. Adjusted access routes would be required to comply with all measures included in the Final IS/MND to avoid impacts on environmental resources and would be designed to minimize impacts. Revisions would not require updates to any resource areas discussed in the Final IS/MND. These revisions reflect minor design adjustments, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O1-13
Please modify Project Mapbook (Page 17) to identify an alternative temporary access route to the structures in the middle of the orchard. The route may reduce impacts and be preferable to the landowner.

Response O1-13
Pages 2-29 and 2-30 of the Final IS/MND have been revised with the additional text to reflect project adjustments to construction access. See Chapter 3, which provides the revised text. These revisions reflect minor design adjustments, and changes to the analysis or conclusions in the Proposed IS/MND are not required.

Comment O1-14
Please modify Project Mapbook (Page 16) to allow for an alternative location of the landing area with the San Diego staging area. Initial outreach has identified that the proposed location may be infeasible.

Response O1-14
Pages 2-29 and 2-30 of the Final IS/MND have been revised with the additional text to reflect project adjustments for the landing area. See Chapter 3, which provides the revised text. The additional location for the landing area is within the proposed 50 acre San Diego Avenue staging area that was analyzed in the Proposed IS/MND (see Table 2-6 of Appendix 1) as shown on revised project element map 10 of 23 (pages 3-57 and 3-58 below). Therefore, this additional location would not require changes to the analysis or conclusions in the Proposed IS/MND.

Comment O1-15
Please modify Project Mapbook (Page 10) to designate the northeast corner as a landing area.

Response O1-15
Pages 2-29 and 2-30 of the Final IS/MND have been revised with the additional text to reflect project adjustments for the landing area. See Chapter 3, which provides the revised text. The additional location for the landing area would occur within the proposed project alignment as analyzed in the Proposed IS/MND. Therefore, changes to the analysis or conclusions in the Proposed IS/MND are not required.

Comment O1-16
Section 2.8.2, Staging Areas (Page 2-27, Table 2-6)

Please modify table an Appendix A Project Mapbook (Page 3) to allow for an alternative location of the Manning Avenue staging area southeast of Manning Avenue and Interstate 5. The alternative location will be approximately the same size. Constructability review determined that this location provided better access and would require fewer improvements for use.

Response O1-16

Pages 2-29 and 2-30 of the Final IS/MND have been revised with the additional text to reflect project adjustments to construction access. See Chapter 3, which provides the revised text. The additional location of the staging area is not near any sensitive receptors, has been surveyed for biological resources, and would be subject to relevant measures contained in the IS/MND. However, the additional location has not been surveyed for cultural resources. Prior to use of the staging area, surveys and avoidance of any discovered cultural resources would occur consistent with measures required in the IS/MND. Therefore, consideration of the additional location of the staging area would not warrant any changes to the analysis or conclusions in the Proposed IS/MND.

Comment O1-17
Section 2.8.2, Work Disturbance Areas (Page 2-28, Table 2-7)

Please modify Appendix A Project Mapbook (Page 7) to include a pulling site northwest as shown below. The pulling area is required to pull conductor at the alignment angle.

Response O1-17
Pages 2-29 and 2-30 of the Final IS/MND have been revised with the additional text to reflect project adjustments to construction access. See Chapter 3, which provides the revised text. These revisions reflect minor design adjustments, and changes to the analysis or conclusions in the Proposed IS/MND are not required.

Comment O1-18
SECTION 2.8.14 CONSTRUCTION WORKFORCE, EQUIPMENT, AND TRAFFIC

Proposed Project Construction Schedule (Page 2-38, Table 2-10)

Please include the following minor adjustments to the proposed construction schedule.

Project Component	Start Date	End Date
Site Survey	April 2026	May 2026
Manning Substation	May 2026	October 2027
PG&E Tranquillity Switching Station Modification	May 2026	April 2027
PG&E Substation and Switching Station Modifications	February 2027	May 2027
PG&E 230-kV Reconductoring	May 2026	March 2027
LSPGC 230-kV Transmission Line	May 2026	November 2027
PG&E 500-kV Interconnections	May~~June~~ 2027	September 2027
PG&E 230-kV Interconnections	May~~June~~ 2027	September 2027
PG&E 230-kV/115-kV Structure Raises	May 2026	July 2027
PG&E 500-kV Transposition Structures	May 2026	June 2028
PG&E Panoche Substation Interconnection Modifications	May 2026	February 2027
Commissioning and Testing	October 2027	June 2028
Demobilization and Site Restoration	February 2028	July 2028

~~Notes: The proposed PG&E 500 kV Transposition Structures and PG&E's proposed modifications at the Las Aguilas Switching Station are not included in the construction schedule. Details on the timeline for the components and modifications are pending development by PG&E.~~

Response O1-18
Table 2-10 on page 2-42 of the Final IS/MND has been revised with the additional text to reflect updates to the project schedule. See Chapter 3, which provides the revised text. These revisions reflect minor adjustments to the schedule, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O1-19
SECTION 2.13 ANTICIPATED PERMITS AND APPROVAL

Page 2-53
Please add the following text to clarify that the NOC will be applicable to the transmission line components of the PG&E scope and that PG&E consulted with CPUC. This would match the language in Section 1.1.

The CPUC is the lead agency for this project pursuant to CEQA. LSPGC will comply with CPUC GO 131-D, which establishes permitting requirements for electrical transmission projects, or its successor regulation. Although PG&E is not applying for a CPCN, PG&E's scope of work is needed to interconnect the project to PG&E's electrical grid. Therefore, although PG&E's interconnection facilities are not being approved in this proceeding, PG&E's switching station and substation modifications, structure raises, transmission line re-routes, transposition structures, interconnections, and reconductoring are considered part of the proposed project for purposes of this CEQA analysis. PG&E will rely on this CEQA document to separately comply with the CPUC's permitting requirements under GO 131-E for construction of the PG&E transmission line facilities necessary to interconnect the project. The proposed PG&E scope of work includes looping existing PG&E transmission lines (230 kV and 500 kV) into the proposed Manning Substation and reconductoring PG&E's existing Panoche-Tranquillity #1 and #2 230 kV lines. ~~PG&E assumes~~In consultation with the CPUC, PG&E has determined that looping the existing lines into the new substation would constitute "extensions" of existing transmission facilities pursuant to Section 564 of the California Public Utilities Code and Section III.A of GO 131-E, while reconductoring and rerouting the lines would constitute "modifications" of existing transmission facilities, enabling PG&E to file a Notice of Construction for the interconnection facilities under Section III.B.1 of GO 131-E. In any event, PG&E will comply with the requirements of GO 131-E or its successor.

Response O1-19
Page 2-57 of the Final IS/MND has been revised with the additional text to clarify the components of PG&E's project that are subject to compliance with GO 131-E. See Chapter 3, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Letter O2 LS Power Grid California, LLC

Dustin Joseph, Director of Environmental Permitting
April 18, 2025

Comment O2-1
LS Power Grid California (LSPGC) has reviewed the Initial Study and Mitigated Negative Declaration (IS/MND) dated March 19, 2025, for the Manning 500/230 kV Substation Project (Project). LSPGC appreciates this opportunity to comment on the Final IS/MND, pursuant to the California Environmental Quality Act (CEQA) Guidelines. Please see the attached LSPGC Comments on the Manning Substation Project Final IS/MND.

Should you have any questions or need any additional information, please do not hesitate to contact me at (925) 808-0291.

Response O2-1
These introductory remarks are acknowledged for the record and will be provided to the decision makers for consideration.

Comment O2-2
The IS/MND states that the document was prepared in accordance with GO 131-D. This reference should be updated to GO 131-E, which was adopted by decision 25-01-055 on January 30, 2025

Response O2-2
LSPGC's application for a certificate of public convenience and necessity (CPCN) authorizing construction of the project was filed on June 28, 2024, and deemed complete on July 24, 2024, prior to the adoption of General Order (GO) 131-E on January 30, 2025. Therefore, LSPGC's CPCN application remains subject to GO 131-D because that was the order in effect at the time the application was filed. PG&E project components would be subject to GO 131-E because PG&E would submit its NOC after the adoption of GO 131-E.

Comment O2-3
An existing road going north/south should be depicted from Dinuba Ave, to connect the western most temporary disturbance area. In addition, Dinuba Ave should be depicted as an existing road.

Response O2-3
The figure on page A-14 in Appendix A of Appendix 1 has been revised to show the existing road going north from Dinuba Avenue, and Dinuba Avenue itself has also been depicted as an existing road. See Chapter 3, which provides the amended figure. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final IS/MND are not warranted.

Comment O2-4
It is stated in the first paragraph of Chapter 2 Project Description that the LSPGC 230 kV transmission line would extend approximately 11.5 miles from the proposed Manning Substation to PG&E's existing Tranquillity Switching Station. Ensure consistency of the LSPGC 230 kV transmission line's length across chapters.

Response O2-4
Page 1-1 of the Final IS/MND has been revised to update the total length of the proposed LSPGC 230 kV transmission line from 12 miles to 11.5 miles to provide consistency throughout the document. See Chapter 3, which provides the revised text. There are no other references to the line being 12 miles long in the Final IS/MND, and this is the only revision warranted. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-5
The Midway Substation should be added to the list.

Response O2-5
Page 2-5 of the Final IS/MND has been revised to add the Midway Substation to the list of PG&E's existing electrical infrastructure in the project alignment. See Chapter 3, which provides the revised text. This revision reflects a minor clarification, and changes to the analysis or conclusions in the Proposed IS/MND are not required.

Comment O2-6
The length of the PG&E 500 kV Interconnections' easement should be greater than 1.1 miles. PG&E would need to secure new easements for the 0.7-mile corridor and 1.1-mile corridor.

Response O2-6
Table 2-4 on page 2-29 of the Final IS/MND has been revised to update the length of the PG&E 500 kV interconnection to 1.8 miles. See Chapter 3, which provides the revised text. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-7
The IS/MND text in this section is inconsistent with the PEA which states "Prior to construction, LSPGC would prepare an HMMP in accordance with Title 24, Part 9 of the CCR and would describe hazardous materials use, transport, storage, management, and disposal protocols." LSPGC requests that the language from the PEA be reinstated, as well as revising the text to indicate that the plan would be submitted to the CPUC for review and not approval. Additionally, a distinction between LSPGC's and PG&E's HMMP should be identified when discussing the HMMP, as there will not be a joint plan.

Response O2-7
Page 2-39 of the Final IS/MND has been revised to clarify that LSPGC and PG&E will prepare separate hazardous materials management plans (HMMPs) prior to project construction for review by the CPUC. See Chapter 3, which provides the revised text. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-8
The PEA includes eight representative viewpoints and corresponding photographs, whereas the IS/MND uses five new representative viewpoints and photographs.

Response O2-8
The IS/MND focuses on the five main viewpoints along the project alignment that were determined to have the most visible aesthetic changes. Readers are referred to Appendix C of Appendix 1, which includes the visual assessment with all eight representative viewpoints if they desire to see the additional visual changes along the project alignment.

Comment O2-9
KOP 1 Simulated View is not consistent with what is shown in the PEA but is consistent with what is in the Visual Resources Technical Report. KOP 1 in the Visual Resources Technical Report represents the design of the project at the time the Visual Resources Technical Report was completed; however, the design changed after finalization of the Visual Resources Technical Report. As a result, the simulations in the Visual Resources Technical Report are outdated, and the visual simulations in the PEA are the most up-to-date and should be the simulations included in the IS/MND.

Response O2-9
Figure 3.1-3a on page 3-19 of the Final IS/MND has been revised to include the most recent simulation of key observation point (KOP) 1. See Chapter 3, which provides the revised text. Additional revisions to Section 3.1, "Aesthetics," of the Final IS/MND are not warranted because the revised simulation contains minor visual changes, and the existing analysis would still apply. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-10
KOP 2 Simulated View is not consistent with what is shown in the PEA but is consistent with what is in the Visual Resources Technical Report. KOP 2 in the Visual Resources Technical Report represents the design of the project at the time the Visual Resources Technical Report was completed; however, the design changed after finalization of the Visual Resources Technical Report. As a result, the simulations in the Visual Resources Technical Report are outdated, and the visual simulations in the PEA are the most up-to-date and should be the simulations included in the IS/MND.

Response O2-10
Figure 3.1-3b on page 3-20 of the Final IS/MND has been revised to include the most recent simulation of key observation point (KOP) 2. See Chapter 3, which provides the revised text. Additional revisions to Section 3.1, "Aesthetics," of the Final IS/MND are not warranted because the revised simulation contains minor visual changes, and the existing analysis would still apply. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-11
As described in the PEA, all TSPs visible in this simulation would be two-pole or single-pole TSPs.

Response O2-11
Page 3-23 of the Final IS/MND has been revised to reference two-pole or single-pole TSPs instead of only single-pole TSPs. See Chapter 3, which provides the revised text. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-12
LSPGC does not plan to install non-specular conductors; forgoing use of the non-specular conductors would not change the impact determinations for aesthetic resources as it is not required to reduce the visual impacts of the conductors. Furthermore, the visual simulations included in the IS/MND do not reflect non-specular conductors.

Response O2-12
Pages 3-25 and 3-26 of the Final IS/MND have been revised to remove reference to non-specular conductors. See Chapter 3, which provides the revised text. Removal of the non-specular conductors does not require changes to the analysis or conclusions of the Final IS/MND because the conclusions for aesthetic impacts are not based on the presence of non-specular conductors.

Comment O2-13
Recommend following the format of Table 3.2-2 to clearly state impacts associated with components. Recommend adding in the listed components in Table 3.2-2 (e.g., Staging Yard, Substation) even if those values are zero, to clearly show impacts of any component.

Response O2-13
Page 3-37 and Table 3.2-2 on page 3-28 of the Final IS/MND have been revised to clarify the impacts from each project component. See Chapter 3, which provides the revised text. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Proposed IS/MND are not warranted.

Comment O2-14
The BRTR identified 15 special-status plant species known to occur and eight species with potential to occur. While Ascent evaluated a greater number of species in their PTO analysis, only one additional species—shining navarretia—was identified as having potential to occur. Confirm this species and provide the methodology for how it was identified as it is not in the CNDDB or CNPS search results.

Response O2-14
The biological resources section of the Final IS/MND used a larger search radius for available special-status species databases than was used in the BRTR. The US Geological Survey 7.5-minute quadrangles including and surrounding the project alignment area were searched: Monocline Ridge, Levis, Tumey Hills, Idria, Ciervo Mtn., Lillis Ranch, Tres

Picos Farms, Cantua Creek, Tranquillity, Coit Ranch, Chaney Ranch, and Chounet Ranch. Shining navarretia was included in the output for the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants database search. This species has been documented in the foothills west of the project alignment area, the approximate range of the species is very close to the segment of the project alignment area west of I-5, and the habitats associated with this species are present in the project alignment area. Therefore, the species was included in the analysis.

Comment O2-15
The values under Operations and Maintenance for diesel consumption were identified as being miscalculated in the PEA. LSPGC identified that this value should be 220 gallons rather than 235,512 gallons of diesel fuel.

Response O2-15
Page 3-133 of the Final IS/MND has been revised to reference 220 gallons of diesel fuel for operations and maintenance. See Chapter 3, which provides the revised text. This revision would not require changes to the conclusions of the Final IS/MND because the total amount of diesel fuel for operations would be less than previously analyzed.

Comment O2-16
Revise the acreage to include the permanent impacts from the Manning Substation or clarify that these impacts only include the transmission alignment.

Response O2-16
Page 3-147 of the Final IS/MND has been revised to reference the total acreage for permanent impacts. See Chapter 3, which provides the revised text. Additional revisions are not required because the total acreage of permanent impacts was already considered in the IS/MND. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-17
LSPGC would conduct geotechnical investigations. However, the project would not require a building permit, and LSPGC would not obtain a building permit.

Response O2-17
Page 3-149 of the Final IS/MND has been revised to remove references to a building permit because a building permit would not be required for the project. See Chapter 3, which provides the revised text. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Proposed IS/MND are not warranted.

Comment O2-18
Preparation of the pulling site would include grubbing and limited grading. Remove reference to excavation.

Response O2-18
Page 3-150 of the Final IS/MND has been revised to remove the reference to excavation. See Chapter 3, which provides the revised text. Additional revisions are not required because the total area for ground-disturbing activities has not changed. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-19
Clarify in paragraph three that PG&Es local maintenance crew would respond to maintenance issues and emergency situations for PG&E's transmission lines. Recommend clarification throughout this paragraph and the next to show that LSPGC would have their own crew to inspect LSPGC components and PG&E would have a crew to inspect PG&E components.

Response O2-19
Page 3-160 of the Final IS/MND has been revised to clarify between LSPGC and PG&E operations and maintenance. See Chapter 3, which provides the revised text. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-20
Approximately 0.4 mile of the PG&E 500 kV Interconnections crosses a high FHSZ, as depicted in Figure 3.20-1. (comment on page 3-160 of the IS/MND)

Response O2-20
Page 3-165 of the Final IS/MND has been revised to include the corrected project wildfire hazard zones consistent with Figure 3.20-1. See Chapter 3, which provides the revised text. The revision would not result in changes to the analysis or conclusions of the Final IS/MND because implementation of APMs and CMs would continue to reduce the risk of wildfire in a high fire hazard severity zone (HFHSZ).

Comment O2-21
Code of Federal Regulations (CFR) Title 40 Part 112 Subpart A states the following general applicability:

> "(b) Except as provided in paragraph (d) of this section, this part applies to any owner or operator of a non-transportation-related onshore or offshore facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful, as described in part 110 of this chapter, into or upon the navigable waters of the United States or adjoining shorelines, or into or upon the waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or the Deepwater Port Act of 1974, or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States (including resources under the Magnuson Fishery Conservation and Management Act)…" "(d) Except as provided in paragraph (f) of this section, this part does not apply to…any onshore or offshore facility, that due to its location, could not reasonably be expected to have a discharge as described in paragraph (b) of this section. This determination must be based solely upon consideration of the geographical and location aspects of the facility (such as proximity to navigable waters or adjoining shorelines, land contour, drainage, etc.) and must exclude consideration of manmade features such as dikes, equipment or other structures, which may serve to restrain, hinder, contain, or otherwise prevent a discharge as described in paragraph (b) of this section."

Due to the geographic location of the project, a discharge is not reasonably expected that would affect the resources described in paragraph (b). Consider removing language describing the SPCC Plan.

Response O2-21
The reference to the Spill Prevention, Control, and Countermeasure (SPCC) Rule on page 3-166 of the Final IS/MND has been retained in the list of federal regulations. Even though a discharge is not reasonably expected, there is still the potential that it could occur, and aquatic features could be affected. Page 3-176 of the Final IS/MND has been revised to state that if a discharge occurs, then LSPGC would adhere to the federal regulation. See Chapter 3, which provides the revised text. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not required.

Comment O2-22
See the previous comment for the applicability of CFR Title 40 Part 112 Subpart A. Due to the geographic location of the project, a discharge is not reasonably expected that would affect the resources described in paragraph (b) in the previous comment. Consider removing language stating that an SPCC Plan would be required.

Response O2-22
Please refer to Response O-21 for a discussion of the SPCC Plan.

Comment O2-23
Approximately 0.4 mile of the PG&E 500 kV Interconnections crosses a high FHSZ, as depicted in Figure 3.20-1. (comment on page 3-175 of the IS/MND existing setting)

Response O2-23
Page 3-180 of the Final IS/MND has been revised to reflect the high FHSZ for the westernmost portion of the project alignment. The reference to "moderate" fire hazard severity zone has been removed. See Chapter 3, which provides the revised text. The revision would not result in changes to the analysis or conclusions of the Final IS/MND because implementation of APMs and CMs would continue to reduce the risk of wildfire in an HFHSZ and ensure impacts are less than significant.

Comment O2-24
Approximately 0.4 mile of the PG&E 500 kV Interconnections crosses a high FHSZ, as depicted in Figure 3.20-1. (comment on page 3-175 IS/MND LSPGC analysis)

Response O2-24
Please refer to Response O2-23 for a discussion of the FHSZ.

Comment O2-25
Approximately 0.4 mile of the PG&E 500 kV Interconnections crosses a high FHSZ, as depicted in Figure 3.20-1. (comment on page 3-175 of the IS/MND PG&E analysis)

Response O2-25
Please refer to Response O2-23 for a discussion of the FHSZ.

Comment O2-26
Approximately 0.4 mile of the PG&E 500 kV Interconnections crosses a high FHSZ, as depicted in Figure 3.20-1. (comment on page 3-176 of the IS/MND)

Response O2-26
Page 3-181 of the Final IS/MND has been revised to include the portion of the project in the HFHSZ and the reference to "low to moderate" fire hazard severity zone has been removed. See Chapter 3, which provides the revised text. The revision would not result in changes to the analysis or conclusions of the Final IS/MND because implementation of APMs and CMs would continue to reduce the risk of wildfire in an HFHSZ and ensure impacts are less than significant.

Comment O2-27
The Environmental Checklist on page 1-158 identifies item h) as "h) Create a significant hazard to air traffic from the installation of new power lines and structures?" Add a discussion for item h, as identified in the Environmental Checklist, and correct the lettering of the checklist questions in Section 3.9.4 Discussion.

Response O2-27
Page 3-181 of the Final IS/MND has been revised to reflect that the project would have no impact on air traffic from installation of the new power lines and structures because the project would screen out using the Federal Aviation Administration Notice Criteria. Subsequent checklist lettering has been updated to reflect this addition. See Chapter 3, which provides the revised text. Although this revision includes additional analysis, it concludes that there would be no impact to air traffic. Under Section 15073.5(2) of the State CEQA Guidelines, this additional information has been added in response to written comments and would not result in new avoidable significant effects.

Comment O2-28
The IS/MND text in this section is not consistent with the PEA. LSPGC would comply with Title 14 Parts 77 and 133 of the CFR, and prior to LSPGC's helicopter usage, a LSPGC Helicopter Use and Safety Plan would be developed and submitted to the CPUC for review (but does not require approval). Additionally, a distinction between LSPGC's use

and PG&E's use of helicopters should be identified when discussing the Helicopter Use and Safety Plan, as there will not be a joint plan. This appears on page 3-177 as well.

Response O2-28
Page 3-182 of the Final IS/MND has been revised to reference separate helicopter use and safety plans, and reference to CPUC approval has been removed. See Chapter 3, which provides the revised text. Additional revisions to the IS/MND are not required because the plans would still be required under Title 14 Parts 77 and 133 of the CFR, even if the plans are submitted to but not approved by the CPUC. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not required.

Comment O2-29
The IS/MND text in this section is inconsistent with the PEA which states "Prior to construction, LSPGC would prepare an HMMP in accordance with Title 24, Part 9 of the CCR and would describe hazardous materials use, transport, storage, management, and disposal protocols." LSPGC requests that the language from the PEA be reinstated, as well as revising the text to indicate that the plan would be submitted to the CPUC for review and not approval. Additionally, a distinction between LSPGC's and PG&E's HMMP should be identified when discussing the HMMP, as there will not be a joint plan.

Response O2-29
Page 3-197 of the Final IS/MND has been revised to reinstate the language from the Proponents Environmental Assessment, and reference to approval of the plan by the CPUC has been removed. See Chapter 3, which provides the revised text. Additional revisions to the IS/MND are not required because the plans would be required pursuant to Title 24, Part 9 of the CCR, even if the plans are submitted to but not approved by the CPUC. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-30
This table should include the Noise Level at 1,090 feet for the nearest sensitive receptor R2 and 190 feet for R3. The nearest receptor label is incorrect in this table (R2 is at 1,090 feet and R3 is at 190 feet).

Response O2-30
Sensitive receptor 2 (R2) has not been included in Table 3.13-8 because sensitive receptor 1 (R1) and sensitive receptor 3 (R3) are the nearest sensitive receptors to the LSPGC project components. As shown in Table 3.13-8 and stated on pages 3-221 of the Final IS/MND, the temporary increase in noise during daytime construction would not result in adverse health effects to nearby receptors. Therefore, R2, which is further from construction of LSPGC project components than R3, would similarly not experience construction noise impacts. Noise impacts on R2 from construction of PG&E project components are analyzed on pages 3-227 and 3-228 of the Final IS/MND.

Comment O2-31
This discussion does not consider the noise impacts associated with the LSPGC 230 kV Transmission Line for R2 and R3. Both receptors should be included.

Response O2-31
Please refer to Response O-30 for a discussion of R2.

Comment O2-32
The tables are called LSPGC construction noise levels by phase. Recommend adding a subscript to the table indicating that because LSPGC and PG&E work areas are similar and equipment is similar, the LSPGC noise levels shown are representative of the PG&E levels.

Response O2-32
Construction noise levels from PG&E project components are shown and analyzed separately on pages 3-223 and 3-224 of the Final IS/MND. Therefore, discussion of PG&E construction noise levels has not been added to the discussion of LSPGC construction noise.

Comment O2-33
The Manning Substation's foundation and pads would be the only components at the substation that increase the impervious surface.

Response O2-33
Page 3-266 of the Final IS/MND has been revised to refer to only the foundation and pads of the substation site. See Chapter 3, which provides the revised text. Additional analysis of impervious surfaces is not warranted because the analysis is qualitative and the proposed detention basin on the substation site would be sufficient to collect and filter stormwater. This revision reflects a minor clarification, and changes to the analysis or conclusions of the Final IS/MND are not warranted.

Comment O2-34
Approximately 0.4 mile of the PG&E 500 kV Interconnection crosses a high FHSZ, as depicted in Figure 3.20-1. Although it would not change the significance of potential impacts, we recommend changing the check box to "Yes" in response to "is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones," and updating the Environmental Setting and Discussion sections accordingly.

Add to the discussion that approximately 0.4 mile of the PG&E 500 kV Interconnections cross a high FHSZ.

Response O2-34
Pages 3-270, 3-275, 3-280, and 3-281 of the Final IS/MND have been revised to update the checkbox and to reference the 0.4 miles of the PG&E 500 kV Interconnection that crosses a high FHSZ. See Chapter 3, which provides the revised text. The revision would not result in changes to the analysis or conclusions of the Final IS/MND because implementation of APMs and CMs would continue to reduce the risk of wildfire in an HFHSZ.

Comment O2-35
LSPGC does not plan to install non-specular conductors; forgoing use of the non-specular conductors would not change the impact determination for visual resources. The visual simulations do not reflect non-specular conductors.

Response O2-35
Please refer to Response O2-12.

Comment O2-36
Figure 4 in Appendix G is not consistent with the FHSZ depicted in Figure 3.20-1 in Section 3.20 Wildfire.

Response O2-36
Figure 3.20-1 in Section 3.20, "Wildfire" of the Final IS/MND represents the most recent data from the California Department of Forestry and Fire Protection (CAL FIRE) collected in September 2024. Figure 4 in Appendix G depicts outdated CAL FIRE data. Appendix G to the IS/MND has been retained because it includes modeled wildfire projections for the project that remain valid regardless of the updated CAL FIRE data. Although the analysis in Section 3.20, "Wildfire," is dependent on Figure 3.20-1 in the Final IS/MND, a footnote has been added to the Final IS/MND that acknowledges the outdated figure in Appendix G.

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3 REVISIONS TO THE PROPOSED IS/MND

This chapter presents specific text changes made to the Proposed IS/MND since its publication and public review. The changes are presented in the order in which they appear in the original Proposed IS/MND and are identified by the IS/MND page number of the revised text (Appendix 1). The information contained within this chapter clarifies, amplifies, and expands on information in the Proposed IS/MND and does not require recirculation. (See State CEQA Guidelines Section 15073.5.) Typographical and editorial revisions suggested in comments have been directly addressed in the Final IS/MND as shown in Appendix 1 and are not shown as revisions in this chapter.

3.1 REVISIONS TO THE INTRODUCTION

In response to Comment O1-2, the following clarifications have been made to the introduction on page 1-1 of the Final IS/MND:

Original:

LS Power Grid California, LLC (LSPGC or Applicant) filed an application (A.24-06-017) with the California Public Utilities Commission (CPUC) on June 28, 2024, for a certificate of public convenience and necessity (CPCN) authorizing the construction of the Manning 500/230 Kilovolt (kV) Substation Project (project). The CPCN application includes project components from both LSPGC and Pacific Gas & Electric (PG&E). While LSPGC is the project applicant, the PG&E components are analyzed alongside the LSPGC components in this California Environmental Quality Act (CEQA) document prepared for the project. Following certification of this CEQA document, PG&E would file its own separate Notice of Construction under a General Order (GO) 131-E Section III.B exemption. This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the CPUC to evaluate potential environmental effects resulting from both the proposed LSPGC facilities and the proposed PG&E facilities. Section 2 "Project Description" presents detailed project information. This IS/MND includes applicant-proposed measures from LSPGC, construction measures from PG&E, and measures developed to address impacts from LSPGC's scope of work and PG&E's scope of work, including monitoring obligations for LSPGC and PG&E.

Revised:

LS Power Grid California, LLC (LSPGC or Applicant) filed an application (A.24-06-017) with the California Public Utilities Commission (CPUC) on June 28, 2024, for a certificate of public convenience and necessity (CPCN) authorizing the construction of the Manning 500/230 Kilovolt (kV) Substation Project (project). The CPCN application includes project components from both LSPGC and Pacific Gas & Electric (PG&E). While LSPGC is the project applicant, the PG&E components are analyzed alongside the LSPGC components in this California Environmental Quality Act (CEQA) document prepared for the project. Following certification of this CEQA document, PG&E would file its own separate Notice of Construction under a General Order (GO) 131-E Section III.B exemption for construction of the PG&E transmission line facilities necessary to interconnect the project. This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the CPUC to evaluate potential environmental effects resulting from both the proposed LSPGC facilities and the proposed PG&E facilities. Section 2 "Project Description" presents detailed project information. This IS/MND includes applicant-proposed measures from LSPGC, construction measures from PG&E, and measures developed to address impacts from LSPGC's scope of work and PG&E's scope of work, including monitoring and/or reporting obligations for LSPGC and PG&E.

In response to Comment O2-4, the following clarification has been made to the introduction on page 1-1 of the Final IS/MND:

Original:

The LSPGC portion of the project entails construction and operation of the new Manning Substation and one new overhead double-circuit 230 kV transmission line that would extend approximately 12 miles from the proposed Manning Substation to interconnect with PG&E's existing Tranquillity Switching Station.

Revised:

The LSPGC portion of the project entails construction and operation of the new Manning Substation and one new overhead double-circuit 230 kV transmission line that would extend approximately 11.5 miles from the proposed Manning Substation to interconnect with PG&E's existing Tranquillity Switching Station.

In response to Comment O1-3, the following clarification has been made to the introduction on page 1-1 of the Final IS/MND:

Original:

PG&E has determined that looping (i.e., interconnecting) the existing lines into the new substation would constitute "extensions" of existing transmission facilities pursuant to Section III.A of GO 131-E, while reconductoring the lines would constitute "modifications" of the existing transmission facilities.

Revised:

In consultation with the CPUC, PG&E has determined that looping (i.e., interconnecting) the existing lines into the new substation would constitute "extensions" of existing transmission facilities pursuant to Section III.A of GO 131-E, while reconductoring the lines would constitute "modifications" of the existing transmission facilities.

3.2 REVISIONS TO THE PROJECT DESCRIPTION

In response to Comment O2-5, the following clarification has been made to the project description on page 2-5 of the Final IS/MND:

Original:

PG&E's existing electrical infrastructure in the area of the project alignment includes the following:

- Tranquillity Switching Station
- Transmission line corridors:
  - Panoche-Excelsior #1 and #2 115 kV transmission line
  - Gates-Panoche #1 and #2 230 kV transmission line
  - Panoche-Tranquillity Switching Station #1 kV and #2 kV transmission line
  - Las Aguilas-Panoche #1 and #2 230 kV transmission line
  - Panoche-Panoche Energy Center 230 kV transmission line
  - Los Banos-Midway #2 500 kV transmission line
  - Los Banos-Gates #1 500 kV transmission line
- Panoche Energy Center (non-PG&E owned facility)
- Tranquillity and Las Aguilas switching stations
- Panoche, Los Banos, and Gates substations

Revised:

PG&E's existing electrical infrastructure in the area of the project alignment includes the following:

- Tranquillity Switching Station
- Transmission line corridors:
  - Panoche-Excelsior #1 and #2 115 kV transmission line
  - Gates-Panoche #1 and #2 230 kV transmission line
  - Panoche-Tranquillity Switching Station #1 kV and #2 kV transmission line
  - Las Aguilas-Panoche #1 and #2 230 kV transmission line
  - Panoche-Panoche Energy Center 230 kV transmission line
  - Los Banos-Midway #2 500 kV transmission line
  - Los Banos-Gates #1 500 kV transmission line
- Panoche Energy Center (non-PG&E owned facility)
- Tranquillity and Las Aguilas switching stations
- Panoche, Los Banos, and Gates substations
- Midway Substation

In response to Comment O1-5, the following clarifications have been made to the project description on page 2-19 of the Final IS/MND:

Original:

As part of the project, PG&E would extend its existing Los Banos-Midway #2 500 kV and Los Banos-Gates #1 500 kV transmission lines to the Manning Substation with an approximately 0.7-mile-long interconnection corridor and 1.1-mile-long interconnection corridor, respectively (each interconnection corridor would contain two lines). These two new interconnection lines would be installed as two corridors: one with up to 10 lattice steel towers (LST), and the other with up to 12 TSP structures, as shown in Appendix A, Figures 2 through 4.

Revised:

As part of the project, PG&E would extend its existing Los Banos-Midway #2 500 kV and Los Banos-Gates #1 500 kV transmission lines to the Manning Substation with an approximately 0.7-mile-long interconnection corridor and 1.1-mile-long interconnection corridor, respectively (each interconnection corridor would contain two lines). These two new interconnection lines would be installed as two corridors: one with up to approximately 12 lattice steel towers (LST), and the other with up to approximately 10 TSP structures, as shown in Appendix A, Figures 2 through 4.

In response to Comment O1-6, the following clarification has been made to the project description on page 2-20 of the Final IS/MND:

Original:

Between the existing Panoche-Tranquillity Switching Station #1 and #2 230 kV transmission line, the Gates-Panoche 230 kV #1 and #2 230 kV transmission line and the Panoche-Excelsior 115 kV #1 and #2 transmission line would be raised to allow the proposed LSPGC 230 kV transmission line and PG&E 230 kV Interconnections to maintain proper ground clearance at the crossing. At the location of the crossing, approximately five structures on each existing line would be replaced with approximately five new TSP structures per line (Appendix A, Figures 10 and 11). TSP structures would have a maximum height of 199 feet with approximately 8 to 12-foot-diameter foundations.

Revised:

Between the existing Panoche-Tranquillity Switching Station #1 and #2 230 kV transmission line, the Gates-Panoche 230 kV #1 and #2 230 kV transmission line and the Panoche-Excelsior 115 kV #1 and #2 transmission line would be raised to allow the proposed LSPGC 230 kV transmission line and PG&E 230 kV Interconnections to maintain proper ground clearance at the crossing. At the location of the crossing, approximately five structures on each existing line would be replaced with approximately five new TSP structures per line (Appendix A, Figures 10 and 11). TSP structures would have a maximum height of 199 feet with approximately 8 to 12-foot-diameter foundations. Approximately three distribution poles near this location may need to be replaced within PG&E's existing right-of-way to accommodate the optical ground wire/distribution conflict.

In response to Comment O1-7, the following clarifications have been made to the project description on page 2-20 of the Final IS/MND:

Original:

Adjacent to PG&E's existing Panoche Substation, the existing Panoche-Tranquillity Switching Station #1 and #2 230 kV transmission line, Gates-Panoche #1 and #2 230 kV transmission line, the Las Aguilas-Panoche #1 230 kV transmission line, and the Panoche-Panoche Energy Center 230kV transmission line would be re-routed into the new breaker-and-a-half configuration inside the Panoche Substation (Appendix A, Figure 19). Approximately two temporary structures and approximately seven new TSP structures would be installed to support the line re-routes. TSP structures would be approximately 120- to 160-feet tall with approximately 3- to 12-foot-diameter foundations. The temporary structure would have a diameter of approximately 3 feet and would be direct buried at a typical depth of 14 feet below ground. The permanent TSPs would be installed on concrete pier foundations each with an approximately 12-foot diameter and a typical depth of 40 feet below ground with an approximate height of 160 feet above ground (Figure 2-8). Approximately five existing structures would be removed as part of the re-routes.

Revised:

Adjacent to PG&E's existing Panoche Substation, the existing Panoche-Tranquillity Switching Station #1 and #2 230 kV transmission line, Gates-Panoche #1 and #2 230 kV transmission line, the Las Aguilas-Panoche #1 230 kV transmission line, and the Panoche-Panoche Energy Center 230kV transmission line would be re-routed into the new breaker-and-a-half configuration inside the Panoche Substation (Appendix A, Figure 19). One span of fiber approximately 400 feet into the east side of the substation may need to be undergrounded depending on final design considerations. Approximately two temporary structures and approximately seven new TSP structures would be installed to support the line re-routes. TSP structures would be approximately 120- to 160-feet tall with approximately 3- to 12-foot-diameter foundations. The temporary structure would have a diameter of approximately 3 feet and would be direct buried at a typical depth of 14 feet below ground. The permanent TSPs would be installed on concrete pier foundations each with an approximately 12-foot diameter and a typical depth of 40 feet below ground with an approximate height of 160 feet above ground (Figure 2-8). Approximately five existing structures would be removed, and approximately one would require foundation modification as part of the re-routes.

In response to Comment O1-9, the following clarifications have been made to the project description on pages 2-20 and 2-21 of the Final IS/MND:

Original:

Each transposition structure would have an approximate maximum height of 145 feet tall with a foundation diameter of approximately 12 feet. The transposition structures would be installed at the following approximate locations:

- 27 miles south of the Manning Substation,
- 25 miles north of the Manning Substation,

- 10 miles south of the Manning Substation, and
- 5 miles south of the Manning Substation

Revised:

Each transposition structure would have an approximate maximum height of 145 feet tall with a foundation diameter of approximately 12 feet.

Transposition structures would be installed approximately 25 miles north of the proposed Manning Substation (existing tower on PG&E's existing Los Banos-Midway #2 500 kV Transmission Line located at approximately 36°52'11.39"N, 120°52'46.63"W and existing tower on Los Banos-Gates #1 500 kV Transmission Line located at approximately 36°52'11.39"N, 120°52'46.63"W). Approximately two new three-pole dead-end TSP transposition structures would be inserted within the current ROW by replacing each existing lattice steel structure listed above (six new TSPs total). Each transposition structure would have an approximate maximum height of 145 feet with a foundation diameter of approximately 12 feet.

One existing transposition structure (currently composed of two lattice steel poles) on the Los Banos-Midway #2 500kV Transmission Line approximately 15 miles south of the proposed LSPGC Manning Substation would be removed (the existing transposition lattice poles are located at approximately 36.435158°, -120.420808° and 36.435027°, -120.421060°). Additionally, both of the adjacent lattice steel structures to the north and to the south would be replaced with new three-pole TSP structures (located at 36.435942°, -120.421706° to the north and 36.433514°, -120.419509° to the south). This work would require grading a crane pad approximately 150 feet by '150' feet at each existing structure.

In response to Comment O1-10, the following project information has been added to the project description on page 2-21 of the Final IS/MND:

Original:

N/A

Revised:

TRANSMISSION GAS LINE

Based on the result of an alternating current (AC) interference study, PG&E must install monitoring equipment on the pipelines in the vicinity of the project to ensure safe operation of the electric and gas line facilities. The approximate AC Coupon Test Station (CTS) location is 36°36'0.15"N, 120°31'45.33"W. Approximately 40-foot-long wire/conduits would be trenched in underground to connect the CTS cabinet located between the pipelines to PG&E's two adjacent gas transmission pipelines for a total of 80 feet of new underground wire/conduit. The CTS cabinet may include bollards for protection.

In response to Comment O1-11, the following clarifications have been made to the project description on pages 2-28 and 2-29 of the Final IS/MND:

Original:

PG&E would secure new rights for installation of the PG&E 500-kV Interconnections, PG&E 230-kV Interconnections, PG&E Panoche Substation Interconnection Modifications, and PG&E 12 kV distribution line by negotiating agreements with each landowner. No development restrictions or existing structures are located within the new easement locations. As described previously, PG&E may need to modify its existing easements to accommodate the PG&E 230-kV Reconductoring.

Under Section 35 of GO 95, the CPUC regulates all aspects of design, construction, and operation and maintenance of electrical distribution lines, including fire safety hazards, for utilities subject to its jurisdiction. The project would be conducted in accordance with Section 35 of GO 95, which requires certain vegetation management activities be performed to establish necessary and reasonable clearances where overhead conductors traverse trees and vegetation (CPUC 2020). LSPGC and PG&E would seek to obtain easements

that would allow for the removal of trees anywhere within the easement that could pose a threat to the lines or adjacent electrical infrastructure.

Revised:

PG&E would secure new rights for installation of the PG&E 500-kV Interconnections, PG&E 230-kV Interconnections, PG&E Panoche Substation Interconnection Modifications, PG&E 12 kV distribution line, and any other required project facilities by negotiating agreements with each landowner. No existing structures or known development restrictions would conflict with securing new rights. As described previously, PG&E may need to modify its existing easements to accommodate the PG&E 230-kV Reconductoring.

Under Section 35 of GO 95, the CPUC regulates all aspects of design, construction, and operation and maintenance of electrical distribution lines, including fire safety hazards, for utilities subject to its jurisdiction. The project would be conducted in accordance with Section 35 of GO 95, which requires certain vegetation management activities be performed to establish necessary and reasonable clearances where overhead conductors traverse trees and vegetation (CPUC 2020). LSPGC and PG&E would seek to obtain easements that would allow for the removal of trees anywhere within and adjacent to the easement that could pose a threat to the lines or adjacent electrical infrastructure.

In response to Comment O1-11, the following clarifications have been made to the project description on pages 2-29 and 2-30 of the Final IS/MND:

Original:

Where existing access is not available and surface conditions are suitable, approximately 16-foot-wide temporary access roads would be established during construction to access temporary construction areas (Appendix A). Grading and/or road base placement would not occur on the temporary access roads unless required for delivery of equipment. During winter months, PG&E may apply heavy duty interlocking panels or gravel on roads for access.

Revised:

Where existing access is not available and surface conditions are suitable, approximately 16-foot-wide temporary access roads would be established during construction to access temporary construction areas (Appendix A). Access routes may be adjusted slightly to address site specific conditions, minimize impacts, and accommodate landowner preferences. Grading and/or road base placement would not occur on the temporary access roads unless required for delivery of equipment. To allow for wet season work, PG&E may weatherize access routes with heavy duty interlocking panels or gravel on roads for access.

In response to Comment O1-16, the following clarification has been made to the project description on page 2-31 of the Final IS/MND:

Original:

A total of four staging areas are proposed to support transmission line and substation construction. Table 2-6 provides a summary of each of the four stating areas. The substation site would also be used as a staging area. All staging areas are shown in Appendix A, Figures 3, 10, 11, 15, 16, and 18.

Revised:

A total of seven staging areas are proposed to support transmission line and substation construction. Table 2-6 provides a summary of each of the seven staging areas. The substation site would also be used as a staging area. All staging areas are shown in Appendix A, Figures 3, 10, 11, 15, 16, and 18.

In response to additional biological resources surveys completed for the project alignment, the following revisions have been made to Table 2-8 on page 2-33 of the Final IS/MND:

Original:

Table 2-8 Impacts on Vegetation Communities

Vegetation Community of Land Cover Type	Temporary LSPGC Project Component Impacts (acres)	Permanent LSPGC Project Component Impacts (acres)	Temporary PG&E Project Component Impacts (acres)	Permanent PG&E Project Component Impacts (acres)	Temporary Shared PG&E and LSPGC Project Component Impacts (acres)	Permanent Shared PG&E and LSPGC Project Component Impacts (acres)	Temporary Total Impacts (acres)	Permanent Total Impacts (acres)
Active Agriculture	159.0	0.18	23.4	0.2	0.02	0	182.4	0.4
Annual Grassland[1]	0	0	33.3	0.2	0	0	33.3	0.2
Developed	0.3	0	0.7	0	0	0	1	0
Disturbed	5.5	1.2	31.9	0.6	25.2	13.1	62.6	14.9
TBD[2]	32.4	2.4	68.5	1.1	59.1	0	160	3.5
Total[3]	**192.2**	**3.8**	**157.8**	**2.1**	**84.3**	**13.1**	**439.3**	**19.0**

[1] *Amsinkia* (*menziesii, tessellate*), *Phacelia* spp. Herbaceous Alliance, and *Avena* spp. (*Bromus* spp., Herbaceous).

[2] Area was not surveyed due to lack of permission from private property owners. Follow-up surveys would be conducted pending landowner approval for survey access.

[3] Totals may not sum due to rounding.

Source: LSPGC 2024.

Revised:

Table 2-8 Impacts on Vegetation Communities

Vegetation Community of Land Cover Type	Temporary LSPGC Project Component Impacts (acres)	Permanent LSPGC Project Component Impacts (acres)	Temporary PG&E Project Component Impacts (acres)	Permanent PG&E Project Component Impacts (acres)	Temporary Shared PG&E and LSPGC Project Component Impacts (acres)	Permanent Shared PG&E and LSPGC Project Component Impacts (acres)	Temporary Total Impacts (acres)	Permanent Total Impacts (acres)
Active Agriculture	178.0	0.6	70.4	1.2	59.3	0	307.7	1.8
Annual Grassland[1]	8.6	0.2	53.9	0.3	0.03	0	62.5	0.5
Saltbush Scrub	<0.01	0	1.1	0.03	0	0	1.1	0.03
Developed	1.3	0.01	2.4	0.04	0	0	3.7	0.05
Disturbed	9.4	3.3	30.4	0.6	24.8	13.1	64.6	16.9
Total[2]	**197.2**	**4.0**	**158.2**	**2.1**	**84.1**	**13.1**	**439.6**	**19.2**

[1] *Amsinkia* (*menziesii, tessellate*), *Phacelia* spp. Herbaceous Alliance, and *Avena* spp. (*Bromus* spp., Herbaceous).

[2] Totals may not sum due to rounding.

Source: LSPGC 2024.

In response to Comment O2-7, the following clarifications have been made to the project description on page 2-39 of the Final IS/MND:

Original:

Prior to construction, a hazardous materials management plan (HMMP) would be prepared describing hazardous materials use, transport, storage, management, and disposal protocols. The HMMP would be prepared in accordance with relevant state and federal guidelines and regulations (e.g., California Division of Occupational Safety and Health [Cal/OSHA]). The HMMP would be prepared by LSPGC and PG&E as part of

a condition of the project and submitted to the CPUC for review and approval prior to any construction activities. The HMMP would include the following information related to hazardous materials and waste as applicable:

Revised:

Prior to construction, a hazardous materials management plan (HMMP) would be prepared in accordance with Title 24, Part 9 of the CCR describing hazardous materials use, transport, storage, management, and disposal protocols. The HMMP would be prepared in accordance with relevant state and federal guidelines and regulations (e.g., California Division of Occupational Safety and Health [Cal/OSHA]). Separate HMMPs would be prepared by LSPGC and PG&E and submitted to the CPUC for review prior to any construction activities. The HMMPs would include the following information related to hazardous materials and waste as applicable:

In response to Comment O1-18, the following clarifications have been made to the project description on page 2-42 of the Final IS/MND:

Original:

Table 2-10 Proposed Project Construction Schedule

Project Component	Start Date	End Date
Site Survey	April 2026	May 2026
Manning Substation	May 2026	October 2027
PG&E Tranquillity Switching Station Modification	May 2026	April 2027
PG&E Substation Modifications	February 2027	May 2027
PG&E 230-kV Reconductoring	May 2026	March 2027
LSPGC 230-kV Transmission Line	May 2026	November 2027
PG&E 500-kV Interconnections	June 2027	September 2027
PG&E 230-kV Interconnections	June 2027	September 2027
PG&E 230-kV/115-kV Structure Raises	May 2026	July 2027
PG&E Panoche Substation Interconnection Modifications	May 2026	February 2027
Commissioning and Testing	October 2027	June 2028
Demobilization and Site Restoration	February 2028	July 2028

Notes: The proposed PG&E 500 kV Transposition Structures and PG&E's proposed modifications at the Las Aguilas Switching Station are not included in the construction schedule. Details on the timeline for the components and modifications are pending development by PG&E.

Source: Modified by Ascent in 2024.

Revised:

Revised Table 2-10 Proposed Project Construction Schedule

Project Component	Start Date	End Date
Site Survey	April 2026	May 2026
Manning Substation	May 2026	October 2027
PG&E Tranquillity Switching Station Modification	May 2026	April 2027
PG&E Substation and Switching Station Modifications	February 2027	May 2027
PG&E 230-kV Reconductoring	May 2026	March 2027
LSPGC 230-kV Transmission Line	May 2026	November 2027
PG&E 500-kV Interconnections	May 2027	September 2027

Project Component	Start Date	End Date
PG&E 230-kV Interconnections	May 2027	September 2027
PG&E 230-kV/115-kV Structure Raises	May 2026	July 2027
PG&E 500-kV Transposition Structures	May 2026	June 2028
PG&E Panoche Substation Interconnection Modifications	May 2026	February 2027
Commissioning and Testing	October 2027	June 2028
Demobilization and Site Restoration	February 2028	July 2028

Source: Modified by Ascent in 2024.

In response to Comment O1-19, the following clarifications have been made to the project description on page 2-57 of the Final IS/MND:

Original:

The CPUC is the lead agency for this project pursuant to CEQA. LSPGC will comply with CPUC GO 131-D, which establishes permitting requirements for electrical transmission projects, or its successor regulation. Although PG&E is not applying for a CPCN, PG&E's scope of work is needed to interconnect the project to PG&E's electrical grid. Therefore, although PG&E's interconnection facilities are not being approved in this proceeding, PG&E's switching station and substation modifications, structure raises, transmission line re-routes, transposition structures, interconnections, and reconductoring are considered part of the proposed project for purposes of this CEQA analysis. PG&E will rely on this CEQA document to separately comply with the CPUC's permitting requirements under GO 131-E. The proposed PG&E scope of work includes looping existing PG&E transmission lines (230 kV and 500 kV) into the proposed Manning Substation and reconductoring PG&E's existing Panoche-Tranquillity #1 and #2 230 kV lines. PG&E assumes looping the existing lines into the new substation would constitute "extensions" of existing transmission facilities pursuant to Section 564 of the California Public Utilities Code and Section III.A of GO 131-E, while reconductoring and rerouting the lines would constitute "modifications" of existing transmission facilities, enabling PG&E to file a Notice of Construction for the interconnection facilities under Section III.B.1 of GO 131-E. In any event, PG&E will comply with the requirements of GO 131-E or its successor.

Revised:

The CPUC is the lead agency for this project pursuant to CEQA. LSPGC will comply with CPUC GO 131-D, which establishes permitting requirements for electrical transmission projects, or its successor regulation. Although PG&E is not applying for a CPCN, PG&E's scope of work is needed to interconnect the project to PG&E's electrical grid. Therefore, although PG&E's interconnection facilities are not being approved in this proceeding, PG&E's switching station and substation modifications, structure raises, transmission line re-routes, transposition structures, interconnections, and reconductoring are considered part of the proposed project for purposes of this CEQA analysis. PG&E will rely on this CEQA document to separately comply with the CPUC's permitting requirements under GO 131-E for construction of the PG&E transmission line facilities necessary to interconnect the project. The proposed PG&E scope of work includes looping existing PG&E transmission lines (230 kV and 500 kV) into the proposed Manning Substation and reconductoring PG&E's existing Panoche-Tranquillity #1 and #2 230 kV lines. In consultation with the CPUC, PG&E has determined looping the existing lines into the new substation would constitute "extensions" of existing transmission facilities pursuant to Section 564 of the California Public Utilities Code and Section III.A of GO 131-E, while reconductoring and rerouting the lines would constitute "modifications" of existing transmission facilities, enabling PG&E to file a Notice of Construction for the interconnection facilities under Section III.B.1 of GO 131-E. In any event, PG&E will comply with the requirements of GO 131-E or its successor.

3.3 REVISIONS TO SECTION 3.1, "AESTHETICS"

In response to Comment O2-9, the Figure 3.1-3a, "KOP 1," has been revised on page 3-19 of the Final IS/MND:

Original:

Source: Insignia Environmental, Inc. photograph taken by Arcadis in 2024.

KOP 1 - Existing View (looking southwest).

Source: Insignia Environmental, Inc. photograph taken by Arcadis in 2024.

KOP 1 - Simulated View (looking southwest).

Figure 3.1-3a KOP 1

Revised:

Source: Insignia Environmental, Inc. by ARCADIS, 2024.

KOP 1 - Existing View (looking Southwest).

Source: Insignia Environmental, Inc. by ARCADIS, 2024.

KOP 1 - Simulated View (looking Southwest).

Revised Figure 3.1-3a KOP 1

In response to Comment O2-10, the Figure 3.1-3b, "KOP 2" has been revised on page 3-20 of the Final IS/MND:

Original:

Source: Insignia Environmental, Inc. photograph taken by Arcadis in 2024.

KOP 2 - Existing View (looking northwest).

Source: Insignia Environmental, Inc., photograph taken by Arcadis in 2024.

KOP 2 - Simulated View (looking northwest).

Figure 3.1-3b KOP 2

Revised:

Source: Insignia Environmental, Inc. by ARCADIS, 2024.

KOP 2 - Existing View (looking Northwest).

Source: Insignia Environmental, Inc. by ARCADIS, 2024.

KOP 2 - Simulated View (looking Northwest).

Revised Figure 3.1-3b KOP 2

In response to Comment O2-11, the following clarifications have been made to the aesthetics section on page 3-25 of the Final IS/MND:

Original:

Glare occurs when a high degree of contrast is evident between bright and dark areas in a field of view, making it difficult for the human eye to adjust to differences in brightness. Nonspecular conductors for the transmission lines and nonreflective insulators at the proposed substation site would be installed as part of the project. The proposed transmission structures would be assembled from nonreflective dulled-gray galvanized steel, thus reducing glare.

Revised:

Glare occurs when a high degree of contrast is evident between bright and dark areas in a field of view, making it difficult for the human eye to adjust to differences in brightness. The proposed transmission structures would be assembled from nonreflective dulled-gray galvanized steel, thus reducing glare.

3.4 REVISIONS TO SECTION 3.2, "AGRICULTURE AND FOREST RESOURCES"

In response to Comment O2-13, the following clarifications have been made to Table 3.2-2 in the agricultural and forest resources section on page 3-38 of the Final IS/MND:

Original:

Table 3.2-2 Temporary Impacts on Important Farmland

Project Component	Important Farmland Designation	Total Approximate Acreage within Temporary Work Areas and Access Roads	LSPGC Acreage within Temporary Work Areas and Access Roads	PG&E Acreage within Temporary Work Areas and Access Roads
Pulling Site	Prime Farmland	25.2	7.9	17.3
	Farmland of Statewide Importance	2.8	2.8	0
Staging Area[1]	Prime Farmland	59.7	59.7	0
	Farmland of Statewide Importance	96.8	96.8	0
Structure Work Area	Prime Farmland	43.9	15.9	28.0
	Farmland of Statewide Importance	10.0 acres	5.5	4.5
Temporary Access Road	Prime Farmland	3.6 acres	1.2	2.4
	Farmland of Statewide Importance	3.3 acres	3.3	0
Total Important Farmland		**245.2 acres**	**193**	**52.2**

Note: Numbers may not add due to rounding.

[1] Use of staging areas would be shared by LSPGC and PG&E, but all staging-area acreage is shown under LSPGC.

Source: Calculated by Ascent in 2024.

Revised:

Revised Table 3.2-2 Temporary Impacts on Important Farmland

Project Component	Important Farmland Designation	Total Approximate Acreage within Temporary Work Areas and Access Roads	LSPGC Acreage within Temporary Work Areas and Access Roads	PG&E Acreage within Temporary Work Areas and Access Roads
Pulling Site	Prime Farmland	25.2	7.9	17.3
	Farmland of Statewide Importance	2.8	2.8	0
Staging Area[1]	Prime Farmland	59.7	59.7	0
	Farmland of Statewide Importance	96.8	96.8	0
Structure Work Area	Prime Farmland	43.9	15.9	28.0
	Farmland of Statewide Importance	10.0 acres	5.5	4.5
Temporary Access Road	Prime Farmland	3.6 acres	1.2	2.4
	Farmland of Statewide Importance	3.3 acres	3.3	0
Staging Yard	Prime Farmland	0	0	0
	Farmland of Statewide Importance	0	0	0
Manning Substation	Prime Farmland	0	0	0
	Farmland of Statewide Importance	0	0	0
Total Important Farmland		**245.2 acres**	**193**	**52.2**

Note: Numbers may not add due to rounding.

[1] Use of staging areas would be shared by LSPGC and PG&E, but all staging-area acreage is shown under LSPGC.

Source: Calculated by Ascent in 2024.

3.5 REVISIONS TO SECTION 3.3, "AIR QUALITY"

In response to Comment A1-9, the following rule has been added to the setting for clarification to the air quality section on page 3-54 of the Final IS/MND:

Original:

- Rule 4202 – Particulate Matter Emission Rate: The purpose of this rule is to limit particulate matter emissions by establishing allowable emission rates.
- Rule 4661 – Organic Solvents: The purpose of this rule is to limit the emissions of VOCs from the use of organic solvents. This rule also specifies the reduction, monitoring, reporting, and disposal requirements.

Revised:

- Rule 4202 – Particulate Matter Emission Rate: The purpose of this rule is to limit particulate matter emissions by establishing allowable emission rates.
- Rule 4641 – Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations: The purpose of this rule is to limit VOC emissions by restricting the application and manufacturing of certain types of asphalt for paving and maintenance operations.

- **Rule 4661 – Organic Solvents:** The purpose of this rule is to limit the emissions of VOCs from the use of organic solvents. This rule also specifies the reduction, monitoring, reporting, and disposal requirements.

3.6 REVISIONS TO SECTION 3.4, "BIOLOGICAL RESOURCES"

In response to Comment A2-12, the following revisions have been made to Construction Measure BIO-A [PG&E] / Mitigation Measure BIO-1 [LSPGC]: Conduct Protocol-Level Surveys for Special-Status Plants and Compensate for Impacts on pages 3-95 and 3-96 of the Final IS/MND:

Original:

Construction Measure BIO-A [PG&E] / Mitigation Measure BIO-1 [LSPGC]: Conduct Protocol-Level Surveys for Special-Status Plants and Compensate for Impacts

Special-status plant surveys described in APM BIO-4 and CM BIO-2 shall follow the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). The surveys will be conducted within suitable habitat during the typical blooming period for the 10 species determined to have potential to occur in the project alignment area as described in Table 3.4-1.

If plant species protected under ESA (i.e., San Joaquin woollythreads) are found during surveys for special-status plants conducted pursuant to APM BIO-4 and CM BIO-2, following the CDFW protocol described above, a protective buffer of at least 20 feet will be established around individual plants, and the plants will be avoided.

If plant species considered special-status under CEQA (i.e., plants with a CRPR of 1 or 2) are found during surveys for special-status plants conducted pursuant to APM BIO-4 and CM BIO-2, following the CDFW protocol described above, a protective buffer of at least 20 feet will be established around individual plants, and the plants will be avoided, if feasible.

Where avoidance of plants considered special-status under CEQA is not feasible, and the only plants present in a work area are annual plants (see Table 3.4-1), initial disturbances associated with temporary construction work activities will be scheduled to occur after seed set and prior to seedling emergence and when soil is dry. If special-status perennial plants (i.e., recurved larkspur) are present in a work area, this method would not avoid impacts, and these plants would be avoided as described above.

When permanent ground disturbing activities cannot be avoided in known annual special-status plant locations the top 4 inches of soil will be collected and retained onsite prior to disturbance and replaced in the same approximate location following completion of project activities. If the surface topography is altered by the work, the surface will be re-contoured to existing conditions and the salvaged topsoil will be replaced.

Revised:

Construction Measure BIO-A [PG&E] / Mitigation Measure BIO-1 [LSPGC]: Conduct Protocol-Level Surveys for Special-Status Plants and Compensate for Impacts

Special-status plant surveys described in APM BIO-4 and CM BIO-2 shall follow the *CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). The surveys will be conducted within suitable habitat during the typical blooming period for the 10 species determined to have potential to occur in the project alignment area as described in Table 3.4-1.If plant species protected under ESA (i.e., San Joaquin woollythreads) are found during surveys for special-status plants conducted pursuant to APM BIO-4 and CM BIO-2, following the CDFW protocol described above, a protective buffer of at least 50 feet will be established around individual plants, and the plants will be avoided.

If plant species considered special-status under CEQA (i.e., plants with a CRPR of 1 or 2) are found during surveys for special-status plants conducted pursuant to APM BIO-4 and CM BIO-2, following the CDFW

protocol described above, a protective buffer of at least 50 feet will be established around individual plants, and the plants will be avoided, if feasible. The size and shape of the protective buffer may be adjusted if a CPUC-approved biologist determines that a smaller buffer will be sufficient to avoid loss of or damage to special-status plants or that a larger buffer is necessary to sufficiently protect plants from project activities. The appropriate size and shape of the protective buffer will be determined by the CPUC-approved biologist and will depend on the plant's growth form (e.g., annual, perennial), plant phenology at the time of implementation of project activities, the individual species' vulnerability to the project activity, and environmental conditions and terrain.

Where avoidance of plants considered special-status under CEQA is not feasible, and the only plants present in a work area are annual plants (see Table 3.4-1), initial disturbances associated with temporary construction work activities will be scheduled to occur after seed set and prior to seedling emergence and when soil is dry. If special-status perennial plants (i.e., recurved larkspur) are present in a work area, this method would not avoid impacts, and these plants would be avoided as described above.

When permanent ground disturbing activities cannot be avoided in known annual special-status plant locations the top 4 inches of soil will be collected and retained onsite prior to disturbance and replaced in the same approximate location following completion of project activities. If the surface topography is altered by the work, the surface will be re-contoured to existing conditions and the salvaged topsoil will be replaced.

In response to Comment A2-8, the following clarifications have been made to the biological resources section on page 3-97 of the Final IS/MND:

Original:

Vegetation removal and ground disturbance may also result in inadvertent removal of milkweed plants, which could result in loss of monarch eggs or caterpillars, and removal of flowering plants that may provide foraging habitat for monarchs or Crotch's bumble bees. Furthermore, construction activities would include the operation of heavy equipment and vehicles, which could generate noise or visual stimuli that could result in disturbance of nearby nesting birds, which may result in nest abandonment and potential loss of eggs or chicks.

Revised:

Vegetation removal and ground disturbance may also result in inadvertent removal of milkweed plants, which could result in loss of monarch eggs or caterpillars, and removal of flowering plants that may provide foraging habitat for monarchs or Crotch's bumble bees. Construction of the Manning Substation would result in loss of foraging habitat for Swainson's hawks. Furthermore, construction activities would include the operation of heavy equipment and vehicles, which could generate noise or visual stimuli that could result in disturbance of nearby nesting birds, which may result in nest abandonment and potential loss of eggs or chicks.

In response to Comments A2-5, A2-6, and A2-7, the following revisions have been made to the biological resources section on page 3-97 of the Final IS/MND:

Original:

PG&E has take authorization for Swainson's hawk, pursuant to the SJVHCP for O&M activities, and would implement AMMs 1–11, AMM-19, AMM-22, and AMM-23 as required under the SJVHCP to address potential impacts on Swainson's hawk, burrowing owl, tricolored blackbird, and other nesting birds.

Revised:

PG&E has take authorization for Swainson's hawk, giant kangaroo rat, San Joaquin antelope squirrel, and San Joaquin kit fox, pursuant to the SJVHCP for O&M activities, and would implement AMMs 1–11, AMM-18, AMM-19, AMM-22, and AMM-23 as required under the SJVHCP to address potential impacts on Swainson's hawk, burrowing owl, tricolored blackbird, and other nesting birds. However, since the designation of burrowing owl as a candidate for listing under CESA, which reflects its increased rarity, CDFW has determined that AMM-18 is no longer sufficient to avoid take of the species.

In response to Comments A2-5, A2-6, A2-7, A2-8, A2-9, and A2-12, the following revisions have been made to the biological resources section on pages 3-98 and 3-99 of the Final IS/MND:

Original:

Implementation of LSPGC APMs and PG&E CMs would reduce impacts on some special-status wildlife species that may occur in the survey area by requiring pre-construction surveys for these species, implementation of avoidance measures, and preparation of species-specific mortality reduction or avoidance plans in consultation with the CDFW and USFWS. However, APMs and CMs do not require pre-construction surveys for California glossy snake, coast horned lizard, San Joaquin coachwhip, or Tulare grasshopper mouse, all of which have potential to occur in the project alignment area. While CM BIO-6 would require pre-construction surveys for western spadefoot for PG&E components, APMs do not require surveys for this species for LSPGC project components. APM BIO-15 and CM BIO-5 require surveys for blunt-nosed leopard lizard, but APM BIO-15 does not include details regarding how the species would be fully avoided, and CM BIO-5 does not specify the survey protocol that would be used. APMs BIO-16 and BIO-17 would require pre-construction surveys and avoidance measures for Crotch's bumble bees for LSPGC components; however, CMs do not require surveys or avoidance of this species for PG&E project components.

APMs BIO-18 and BIO-20 (for LSPGC project components) and CM BIO-6 (for PG&E project components) would require pre-construction surveys for nesting birds and implementation of avoidance measures; however, the surveys would only be implemented in the area where the work is to occur, which may not be sufficient to detect nests adjacent to work areas that could be disturbed by construction and maintenance activities. Furthermore, APMs and CMs do not identify the protocols that would be followed for nesting bird species, as applicable.

Construction of LSPGC and PG&E project components may result in a substantial adverse effect on special-status reptiles (including blunt-nosed leopard lizard), western spadefoot, special-status birds, Crotch's bumble bee and Tulare grasshopper mouse, either directly (i.e., mortality of individuals) or through habitat modifications (i.e., loss of habitat) if they are present in the project alignment area. Impacts on these species would be significant without mitigation.

Revised:

Implementation of LSPGC APMs and PG&E CMs would reduce impacts on some special-status wildlife species that may occur in the survey area by requiring pre-construction surveys for these species, implementation of avoidance measures, and preparation of species-specific mortality reduction or avoidance plans in consultation with the CDFW and USFWS. However, APMs and CMs do not require pre-construction surveys for California glossy snake, coast horned lizard, San Joaquin coachwhip, American badger, or Tulare grasshopper mouse, all of which have potential to occur in the project alignment area. Although CM BIO-3 would require pre-construction surveys for giant kangaroo rat, the survey protocol and methods are not specified. Although CM BIO-4 and APM BIO-8 would require pre-construction surveys for San Joaquin kit foxes, CM BIO-4 references an outdated USFWS protocol and includes den excavation that could potentially result in take of foxes, and APM BIO-8 only requires surveys be conducted within 500 feet of grassland habitat; however, kit foxes can occur in additional land cover types. While CM BIO-6 would require pre-construction surveys for western spadefoot for PG&E components, APMs do not require surveys for this species for LSPGC project components. APM BIO-15 and CM BIO-5 require surveys for blunt-nosed leopard lizard, but APM BIO-15 does not include details regarding how the species would be fully avoided, and CM BIO-5 does not specify the survey protocol that would be used. APMs BIO-16 and BIO-17 would require pre-construction surveys and avoidance measures for Crotch's bumble bees for LSPGC components; however, these APMs do not reflect current measures published by CDFW, and CMs do not require surveys or avoidance of this species for PG&E project components. Furthermore, CM BIO-3 does not explicitly state that an incidental take permit would be obtained if take of giant kangaroo rat and San Joaquin antelope ground squirrel cannot be avoided.

APMs BIO-18 and BIO-20 (for LSPGC project components) and CM BIO-6 (for PG&E project components) would require pre-construction surveys for nesting birds and implementation of avoidance measures; however, the surveys would only be implemented in the area where the work is to occur, which may not be sufficient to detect nests adjacent to work areas that could be disturbed by construction and maintenance activities. These APMs and CMs do not identify the protocols that would be followed for nesting bird species, as applicable. Furthermore, the project alignment area contains foraging habitat for Swainson's hawks, including grassland, and project implementation would result in conversion of this habitat, especially construction of the Manning Substation. As described in Chapter 2 under the heading "2.8.3 Work Disturbance Areas," the total acreage of permanent disturbance for the project will be 21.8 acres. Most of this permanent disturbance footprint and the associated loss of Swainson's hawk foraging habitat would be associated with the Manning Substation (i.e., 16.1 acres).

Construction of LSPGC and PG&E project components may result in a substantial adverse effect on special-status reptiles (including blunt-nosed leopard lizard), western spadefoot, special-status birds, Crotch's bumble bee, giant kangaroo rat, San Joaquin antelope squirrel, Tulare grasshopper mouse, American badger, and San Joaquin kit fox either directly (i.e., mortality of individuals) or through habitat modifications (i.e., loss of habitat) if they are present in the project alignment area. Impacts on these species would be significant without mitigation.

In response to Comment A2-8, Construction Measure BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC]: Implement Survey Area Minimums, Survey Timing Standards, and Applicable Protocols for Special-Status and Other Native Birds has been revised on page 3-101 of the Final IS/MND:

Original:

Construction Measure BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC]: Implement Survey Area Minimums, Survey Timing Standards, and Applicable Protocols for Special-Status and Other Native Birds

The following measure shall supplement the requirements in APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components), as presented in the PEA, for special-status and other native birds:

- Pre-construction nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components) shall be conducted within work areas and accessible areas in the following buffers surrounding the work area:
  - 0.25 miles for Swainson's hawk;
  - 500 feet for northern harrier, short-eared owl, and other native raptors; and
  - 250 feet for other native bird species.
- Nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components) shall be conducted no more than 10 days prior to the start of construction activities during the nesting bird season (February 1 to September 15). Continuous construction within an area following a nesting bird survey will negate the need to repeat additional nesting bird surveys. If there is a five day or more lapse in project construction within an area, the nesting bird survey shall be repeated.
- Focused surveys for Swainson's hawk shall follow the protocols found in *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory Committee 2000).
- If an active nest is discovered during nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and construction activities would occur during the nesting bird season, no-disturbance buffers shall be established. No-disturbance buffers shall be at least 0.25 miles for Swainson's hawk, 500 feet for northern harrier, short-eared owl, or other native raptors, 100 feet for non-

raptor special-status birds, and 20 feet for other native birds (i.e., without special status). Any reduction in the no-disturbance buffer for special-status bird species shall require consultation with the CPUC-approved biologist, and would require additional measures, including biological monitoring to determine whether nesting birds are exhibiting disturbance behaviors, after which the no-disturbance buffer size shall be increased.

- No-disturbance buffers described in CM BIO-8 (for PG&E components) that would follow the most recent PG&E Nesting Bird Management Plan would be sufficient to maintain impacts on nesting birds at less than significant under CEQA.

Revised:

Construction Measure BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC]: Implement Survey Area Minimums, Survey Timing Standards, and Applicable Protocols for Special-Status and Other Native Birds

The following measure shall supplement the requirements in APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components), as presented in the PEA, for special-status and other native birds:

- Pre-construction nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components) shall be conducted within work areas and accessible areas (i.e., existing LSPGC or PG&E rights-of-way, public land, private land with existing access permission) in the following buffers surrounding the work area:
  - 0.5 miles for Swainson's hawk;
  - 500 feet for northern harrier, short-eared owl, and other native raptors; and
  - 250 feet for other native bird species.
- To avoid trespassing, inaccessible areas (e.g., private land) shall be surveyed using binoculars or spotting scopes as feasible (i.e., to the maximum distance achievable using these tools). As a result, it may not be feasible to complete surveys in the full survey buffer in all cases; however, LSPGC and PG&E shall implement the full survey buffer wherever feasible.
- Nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components) shall be conducted no more than 10 days prior to the start of construction activities during the nesting bird season (February 1 to September 15). Continuous construction within an area following a nesting bird survey will negate the need to repeat additional nesting bird surveys. If there is a five day or more lapse in project construction within an area, the nesting bird survey shall be repeated.
- Focused surveys for Swainson's hawk shall follow the protocols found in *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory Committee 2000).
- If an active nest is discovered during nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and construction activities would occur during the nesting bird season, no-disturbance buffers shall be established, within which no ground-disturbing construction activities would occur until the nest is no longer active as determined by a CPUC-approved biologist. No-disturbance buffers shall be at least 0.5 miles for Swainson's hawk, 500 feet for northern harrier, short-eared owl, or other native raptors, 250 feet for non-raptor special-status birds, and 20 feet for other native birds (i.e., without special status). No-disturbance buffer sizes for other native birds (non-raptors) without special status may be increased at the discretion of the CPUC-approved biologist depending on factors including species, nest height, topography, existing vegetative or other barriers between the nest and project activities, and disturbance level surrounding the nest. Any reduction in the no-disturbance buffer for special-status bird species shall require consultation with the CPUC-approved biologist, and would

require additional measures, including biological monitoring to determine whether nesting birds are exhibiting disturbance behaviors, after which the no-disturbance buffer size shall be increased.

- No-disturbance buffers described in CM BIO-8 (for PG&E components) that would follow the most recent PG&E Nesting Bird Management Plan would be sufficient to maintain impacts on nesting birds at less than significant under CEQA.
- If an active Swainson's hawk nest is detected, and implementation of the 0.5-mile no-disturbance buffer is not feasible, LSPGC or PG&E shall consult with CDFW to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

In response to Comment A2-9, Construction Measure BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC]: Conduct Protocol-Level Surveys for Burrowing Owl and Implement Avoidance Measures has been revised on pages 3-102 and 3-103 of the Final IS/MND:

Original:

Construction Measure BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC]: Conduct Protocol-Level Surveys for Burrowing Owl and Implement Avoidance Measures

The following measure shall supersede and replace APMs BIO-6 and APM BIO-10 (for LSPGC components) and CM BIO-7 (for PG&E components), as presented in the PEA, for burrowing owl:

- A qualified biologist approved by the CPUC shall conduct surveys for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet of the work area. Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. A minimum of four surveys shall be conducted to determine whether burrowing owls occupy the site. Surveys shall be conducted according to Appendix D of the 2012 *Staff Report on Burrowing Owl Mitigation* prepared by the California Department of Fish and Game (now CDFW) (CDFW 2012) or any subsequent updated guidance. If feasible, at least one survey should be conducted between February 15 and April 15, and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, shall be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur.
- If no occupied burrows are found, the qualified biologist shall submit a report documenting the survey methods and results to LSPGC or PG&E and the CPUC, and no further mitigation shall be required.
- If an active burrow is found within 1,640 feet of pending construction activities, LSPGC or PG&E shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls.
    - During the nonbreeding season (September 1 through January 31), the minimum buffer distance shall be 164 feet (50 meters). During the breeding season (February 1 through August 31), the minimum buffer distance shall be increased to 1,640 feet (500 meters).
    - The buffer may be adjusted if, in consultation with the CDFW, the qualified biologist determines that an alternative buffer shall not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, the qualified biologist shall monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist shall have the authority to halt the activities and reestablish a

buffer consistent with the first item above until the agitated behavior ceases and normal behavior resumes.

- The buffer shall remain in place around the occupied burrow and associated satellite burrows until the qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days.
- Locations of burrowing owls detected during surveys shall be reported to the CNDDB within 30 days.

Revised:

Construction Measure BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC]: Conduct Protocol-Level Surveys for Burrowing Owl and Implement Avoidance Measures

The following measure shall supersede and replace APMs BIO-6 and APM BIO-10 (for LSPGC components) and CM BIO-7 (for PG&E components), as presented in the PEA, for burrowing owl.

LSPGC and PG&E Construction Activities and LSPGC O&M Activities

- A qualified biologist approved by the CPUC shall conduct surveys for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet of the work area. Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. A minimum of four surveys shall be conducted to determine whether burrowing owls occupy the site. Surveys shall be conducted according to Appendix D of the 2012 Staff Report on Burrowing Owl Mitigation prepared by the California Department of Fish and Game (now CDFW) (CDFW 2012) or any subsequent updated guidance. If feasible, at least one survey should be conducted between February 15 and April 15, and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, shall be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur.
- If no occupied burrows are found, the qualified biologist shall submit a report documenting the survey methods and results to LSPGC or PG&E and the CPUC, and no further mitigation shall be required.
- If an active burrow is found within 1,640 feet of pending construction activities, LSPGC or PG&E shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls.
    - If an active burrow is found within 1,640 feet of pending construction activities, LSPGC or PG&E shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls
    - The buffer may be adjusted if, in consultation with the CDFW, the qualified biologist determines that an alternative buffer shall not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, the qualified biologist shall monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist shall have the authority to halt the activities and reestablish a buffer consistent with the first item above until the agitated behavior ceases and normal behavior resumes.

- The buffer shall remain in place around the occupied burrow and associated satellite burrows until the qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days.
- Locations of burrowing owls detected during surveys shall be reported to the CNDDB within 30 days.

PG&E O&M Activities

PG&E shall consult with CDFW to determine the appropriate protective buffer distance for active burrowing owl burrows detected in or within 1,640 feet of the project alignment area to avoid take of burrowing owls from O&M activities.

In response to Comment A2-10, Construction Measure BIO-G [PG&E] / Mitigation Measure BIO-7 [LSPGC]: Implement Limited Operating Period, Conduct Focused Surveys, and Implement Avoidance Measures for Crotch's Bumble Bee has been revised on pages 3-103 and page 3-104 of the Final IS/MND:

Original:

Construction Measure BIO-G [PG&E]: Implement Limited Operating Period, Conduct Focused Surveys, and Implement Avoidance Measures for Crotch's Bumble Bee

The following measure shall apply for PG&E project components and for Crotch's bumble bee:

- Initial ground-disturbing work (e.g., grading, vegetation removal, staging) in grassland habitat or edges of agricultural areas that contain grasses or forbs shall take place between August 15 and March 15, if feasible to avoid impacts on nesting Crotch's bumble bees.
- If the above limited operating period is not feasible (i.e., if limiting ground disturbance to the period between August 15 and March 15 would preclude achieving most of all of the project objectives) as determined by PG&E with concurrence from the CPUC, a qualified biologist approved by the CPUC, familiar with bumble bees of California and experienced using survey methods for bumble bees, shall conduct a habitat assessment and focused survey for Crotch's bumble bee before the start of any ground-disturbing activities in grassland habitat or edges of agricultural areas that contain grasses or forbs. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from April through August (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). Surveys shall be conducted during the colony active period the same year as the start of planned construction activities.
- PG&E shall submit a survey report to the CDFW and the CPUC within 1 month of survey completion and shall notify the CDFW and the CPUC within 24 hours if Crotch's bumble bees are detected.
- If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following:
  - Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with the CDFW, shall determine the appropriate buffer size to protect nesting colonies.
  - If nesting colonies are detected, avoidance areas shall be implemented in areas near the colony location that contain significant floral resources for the colony, if present. A qualified biologist shall determine the appropriate avoidance area size to protect foraging resources.
  - If project activities involving temporary disturbance (e.g., staging) would occur where a nesting colony was detected after the nesting colony is no longer active, the area shall be restored to original conditions after the temporary disturbance is complete such that habitat for Crotch's bumble bee would be available.

- If take of Crotch's bumble bee cannot be avoided, PG&E shall obtain an Incidental Take Permit (ITP) from the CDFW and shall implement all avoidance measures included in the ITP. The CDFW may also require compensatory mitigation through on-site habitat restoration or purchase of credits at an appropriate mitigation bank. Avoidance measures included in the ITP would reduce the likelihood of take of Crotch's bumble bees such that impacts on the species would be fully mitigated. These measures would include but not be limited to:
  - specifications for construction timing and sequencing requirements to avoid impacts on nesting Crotch's bumble bees;
  - pre-construction surveys conducted within 30 days prior to the start of ground-disturbing activities;
  - establishment of seasonal no-disturbance buffers around nest sites;
  - construction monitoring;
  - restrictions associated with construction practices, equipment, or materials that may harm bumble bees (e.g., BMPs to minimize the spread of invasive plant species); and
  - provisions to avoid Crotch's bumble bees or potential Crotch's bumble bees if observed away from a nest during project activity (e.g., ceasing of project activities until the animal has left the work area).
  - Documentation of compliance with this mitigation measure and any required coordination with the CDFW or acquisition of an ITP shall be provided to the CPUC before commencement of any project construction activities.

Revised:

Construction Measure BIO-G [PG&E] / Mitigation Measure BIO-7 [LSPGC]: Implement Limited Operating Period, Conduct Focused Surveys, and Implement Avoidance Measures for Crotch's Bumble Bee

- The following measure shall supersede APMs BIO-16 and BIO-17 for LSPGC components and shall apply for PG&E project components and for Crotch's bumble bee:
  - Initial ground-disturbing work (e.g., grading, vegetation removal, staging) in grassland habitat or edges of agricultural areas that contain grasses or forbs shall take place between August 15 and March 15, if feasible to avoid impacts on nesting Crotch's bumble bees.
  - If the above limited operating period is not feasible (i.e., if limiting ground disturbance to the period between August 15 and March 15 would preclude achieving most of all of the project objectives) as determined by LSPGC or PG&E with concurrence from the CPUC, a qualified biologist approved by the CPUC, familiar with bumble bees of California and experienced using survey methods for bumble bees, shall conduct a habitat assessment and focused survey for Crotch's bumble bee before the start of any ground-disturbing activities in grassland habitat or edges of agricultural areas that contain grasses or forbs. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from April through August (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023). Surveys shall be conducted during the colony active period the same year as the start of planned construction activities.
  - LSPGC and PG&E shall submit a survey report to the CDFW and the CPUC within 1 month of survey completion and shall notify the CDFW and the CPUC within 24 hours if Crotch's bumble bees are detected.
  - If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following:

- Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with the CDFW, shall determine the appropriate buffer size to protect nesting colonies.
- If nesting colonies are detected, avoidance areas shall be implemented in areas near the colony location that contain significant floral resources for the colony, if present. A qualified biologist shall determine the appropriate avoidance area size to protect foraging resources.
- If project activities involving temporary disturbance (e.g., staging) would occur where a nesting colony was detected after the nesting colony is no longer active, the area shall be restored to original conditions after the temporary disturbance is complete such that habitat for Crotch's bumble bee would be available.

- If take of Crotch's bumble bee cannot be avoided, LSPGC and PG&E shall obtain an Incidental Take Permit (ITP) from the CDFW and shall implement all avoidance measures included in the ITP. The CDFW may also require compensatory mitigation through on-site habitat restoration or purchase of credits at an appropriate mitigation bank. Avoidance measures included in the ITP would reduce the likelihood of take of Crotch's bumble bees such that impacts on the species would be fully mitigated. These measures would include but not be limited to:
  - specifications for construction timing and sequencing requirements to avoid impacts on nesting Crotch's bumble bees;
  - pre-construction surveys conducted within 30 days prior to the start of ground-disturbing activities;
  - establishment of seasonal no-disturbance buffers around nest sites;
  - construction monitoring;
  - restrictions associated with construction practices, equipment, or materials that may harm bumble bees (e.g., BMPs to minimize the spread of invasive plant species); and
  - provisions to avoid Crotch's bumble bees or potential Crotch's bumble bees if observed away from a nest during project activity (e.g., ceasing of project activities until the animal has left the work area).
- Documentation of compliance with this mitigation measure and any required coordination with the CDFW or acquisition of an ITP shall be provided to the CPUC before commencement of any project construction activities.

In response to Comments A2-5 and A2-6, a new measure for giant kangaroo rat and San Joaquin antelope squirrel has been added on page 3-104 of the Final IS/MND:

Original:

N/A

Revised:

Construction Measure BIO-H [PG&E]: Conduct Focused Surveys for Giant Kangaroo Rat and San Joaquin Antelope Squirrel and Implement Avoidance Measures

The following measure shall supersede and replace CM BIO-3 (for PG&E components), as presented in the PEA, for giant kangaroo rat and San Joaquin antelope squirrel:

- Prior to the initiation of any construction activity, a CPUC-approved biologist shall conduct a habitat assessment in the project alignment area to identify habitat suitable for giant kangaroo rat and San Joaquin antelope squirrel. The habitat assessment shall consider land cover types associated with these species (e.g., grassland), presence of burrows potentially suitable for the species, and incidental sightings

of giant kangaroo rats or San Joaquin antelope squirrels. Where habitat determined to be potentially suitable for these species is identified, the following measures shall apply:

- Prior to the initiation of any construction activity, a qualified biologist approved by the CPUC, and with a valid USFWS Section 10(a)1(A) recovery permit (for giant kangaroo rat) and valid CDFW scientific collecting permit (for giant kangaroo rat and San Joaquin antelope squirrel), shall conduct surveys of the proposed project work area for giant kangaroo rat and San Joaquin antelope squirrel. Surveys shall be confined to proposed project work areas that overlap the habitat determined to be potentially suitable during the habitat assessment described above, as well as disturbed habitats and agricultural areas within a 500-foot radius of these areas (referred to below as the "survey area"). Surveys for giant kangaroo rat shall conform to the methodology outlined in the San Joaquin Kangaroo Rat Trapping Protocol (USFWS 2013). Surveys for San Joaquin antelope squirrels shall consist of walking transects and visually inspecting the survey area for squirrels and potential burrows

- If giant kangaroo rats or San Joaquin antelope squirrels or potential burrows are determined to be absent during surveys, the qualified biologist shall submit a report summarizing the results of the survey to PG&E and the CPUC, and further mitigation will not be required.
- If giant kangaroo rats or San Joaquin antelope squirrels or potential San Joaquin antelope squirrel burrows are determined to be present through these surveys, a qualified biologist shall map all burrows suitable for giant kangaroo rat and San Joaquin antelope squirrels in the survey area. A minimum 50-foot no-disturbance buffer shall be established around all burrows determined to be occupied by giant kangaroo rat or San Joaquin antelope squirrels, within which no project activities shall occur.
- If the 50-foot no-disturbance buffers cannot be fully implemented, PG&E shall consult with USFWS and CDFW prior to initiating project activities to determine whether other measures are required to ensure compliance with ESA and CESA, respectively. If additional avoidance is not feasible and take is reasonably certain to occur, PG&E shall obtain an ITP from CDFW (for giant kangaroo rat and San Joaquin antelope squirrel) and USFWS (for giant kangaroo rat) and shall implement all avoidance measures included in the ITP. CDFW may also require compensatory mitigation through on-site habitat restoration or purchase of credits at an appropriate mitigation bank. Avoidance measures included in the ITP would reduce the likelihood of take of giant kangaroo rats and San Joaquin antelope squirrels such that impacts on the species would be fully mitigated. These measures would include but not be limited to:
  - construction monitoring;
  - -restrictions associated with construction practices, equipment, or materials that may harm giant kangaroo rats or San Joaquin antelope squirrels; and
  - -provisions to avoid giant kangaroo rats and San Joaquin antelope squirrels if observed away from a burrow during project activity (e.g., ceasing of project activities until the animal has left the work area).

Documentation of compliance with this mitigation measure and any required coordination with the USFWS and CDFW, including but not limited to the acquisition of an ITP, shall be provided to the CPUC before commencement of any project construction activities.

In response to Comment A2-12, a new measure for American badger has been added on page 3-105 of the Final IS/MND:

Original:

N/A

Revised:

Construction Measure BIO-I [PG&E] / Mitigation Measure BIO-8 [LSPGC]: Conduct Focused Surveys for American Badger and Implement Avoidance Measures

The following measure shall supplement the requirements in APMs BIO-6 and BIO-10 (for LSPGC project components) and shall apply for PG&E project components for American badger:

- For LSPGC project components, pre-construction wildlife and burrow surveys conducted pursuant to APM BIO-6 and burrow and den avoidance implemented pursuant to APM BIO-10 shall also incorporate American badger.
- For PG&E components, the following measures shall be implemented.
  - Within 14 days before commencement of project activities, a qualified wildlife biologist approved by the CPUC familiar with American badger and experienced using survey methods for the species shall conduct focused surveys of habitat suitable for the species in the project alignment area to identify any American badger dens.
  - If occupied dens are not found, the qualified biologist shall submit a report summarizing the results of the survey to PG&E and the CPUC, and further mitigation shall not be required.
  - If occupied dens are found, then dens shall be monitored to determine if occupation is by an adult badger only or if it is a natal den. Impacts on active badger dens shall be avoided by establishing exclusion zones around all active badger dens. If the qualified biologist determines that the den is a natal den, an exclusion zone of 200 feet shall be maintained around the den until the qualified biologist determines that the den has been vacated. If the den is occupied by an adult badger only, the size of the buffer shall be determined by a qualified biologist. No project activities (e.g., vegetation removal, ground disturbance, staging) shall occur within the exclusion zone until denning activities are complete (i.e., the adult badger and young have left the area) or the den is abandoned, as confirmed by a qualified biologist. The qualified biologist shall monitor each den once per week to track the status of the den and to determine when it is no longer occupied. When the den is no longer occupied, project activities within the exclusion zone may occur. Monitoring reports shall be submitted to CDFW and the CPUC.

As a result of findings in the amendment to the BRTR (Insignia Environmental 2025) the following measure has been removed from the Biological Resources" section on page 3-104 of the Final IS/MND:

Original:

Construction Measure BIO-H [PG&E] / Mitigation Measure BIO-7 [LSPGC]: Conduct Focused Surveys for Tulare Grasshopper Mouse and Implement Avoidance Measures

Within 14 days before the initiation of any construction activity, a qualified biologist approved by the CPUC shall conduct a survey for potentially suitable burrows for Tulare grasshopper mouse in suitable shrub and grassland habitat in and within 100 feet of the project alignment area.

- If no burrows suitable for Tulare grasshopper mouse are found, the qualified biologist shall submit a report summarizing the results of the survey to LSPGC, PG&E, and the CPUC, and further mitigation will not be required.
- If potential Tulare grasshopper mouse burrows are detected, the qualified biologist shall conduct further investigation to determine whether the burrows are occupied by this species. Further investigation may include live trapping (with Sherman live traps; with an applicable CDFW scientific collecting permit) or noninvasive camera trapping for a minimum of 5 nights. Live trapping surveys associated with LSPGC components may be conducted in conjunction with giant kangaroo rat surveys conducted pursuant to APM BIO-7. The CPUC and CDFW shall approve all trapping plans prior to implementation.

- If burrows are determined to be occupied by Tulare grasshopper mice, APM BIO-10 shall be implemented for this species for LSPGC project components, and the following measures shall be implemented for PG&E project components consistent with APM BIO-3:
  - If occupied or potentially occupied burrows can be avoided by a minimum of 50 feet, then work can proceed.
  - If occupied or potentially occupied burrows cannot be avoided by 50 feet, then a qualified biologist shall stake and flag an appropriate work-exclusion zone and remain on site as a biological monitor.
  - If avoidance of Tulare grasshopper mouse burrows is not possible, the CDFW will be consulted, and species-specific mortality reduction or avoidance plans will be developed for agency review and approval, as appropriate. These plans may include, but will not be limited to the following:
    - Detailed description of trapping methodology,
    - Detailed burrow excavation methods,
    - Release location(s),
    - Detailed release methods,
    - Artificial burrow design and installation methods,
    - Description of exclusion fencing type and implementation, and
    - Identification of a wildlife rehabilitation center or veterinary facility capable of and willing to treat injured special-status species.
    - Any other construction activities that may adversely affect burrows occupied by Tulare grasshopper mouse (including movement of construction equipment and other activities outside of the fenced/paved areas within wildlife habitat) will be monitored by a qualified biologist. The monitor/inspector will have the authority to stop work activities upon the discovery of sensitive biological resources and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts on sensitive resources

Revised:

N/A

In response to Comment A2-7, a new measure for San Joaquin kit fox has been added on pages 3-105 and 3-106 of the Final IS/MND:

Original:

N/A

Revised:

Construction Measure BIO-J [PG&E] / Mitigation Measure BIO-9 [LSPGC]: Conduct Focused Surveys for San Joaquin Kit Foxes and Implement Avoidance Measures

The following measures, in accordance with the *USFWS Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011), shall supersede the requirements in APMs BIO-8 (for LSPGC components) and CM BIO-4 (for PG&E components) as presented in the PEA for San Joaquin kit fox:

- Preconstruction surveys shall be conducted by a qualified biologist no less than 14 days and no more than 30 days prior to the beginning of ground disturbance or construction activities or any project activity likely to adversely affect the San Joaquin kit fox. Surveys shall identify San Joaquin kit fox habitat features in the project alignment area (e.g., dens), evaluate use by kit fox, and assess the potential impacts on the kit fox by the proposed activity. Survey methods shall include thoroughly inspecting

suitable habitat in the project alignment area for kit fox dens using walking line transects. The status of all dens shall be determined and mapped.

- If no San Joaquin kit fox or potential dens (i.e., a burrow at least four inches in the diameter that opens within two feet) are found, the qualified biologist shall document the findings in a letter report to the CPUC, and LSPGC or PG&E, and no further mitigation will be required.
- If potential or confirmed San Joaquin kit fox dens are found, exclusion zones shall be established for all dens within the project alignment area that are within 200 feet of project work areas, and construction activity and other ground disturbance shall be prohibited within these zones. Potential dens shall be marked with flagged stakes 50 feet from the den entrance. A 100-foot exclusion zone will be established and demarcated using USFWS-approved fencing around the entrance of known dens.
- If a natal/pupping den is discovered within the project alignment area or within 200 feet of the project boundary, USFWS, CDFW, and the CPUC shall be immediately notified and the den shall not be disturbed or destroyed without prior authorization or a take permit.
- If potential dens are identified (i.e., a burrow at least four inches in the diameter that opens within two feet), the den entrances shall be dusted, and camera and scent stations shall be deployed for three calendar days to register and track activity of any San Joaquin kit fox present. If no San Joaquin kit fox activity is identified after three days, the den may be removed. Den removal must be appropriately monitored and conducted by a qualified wildlife biologist.
- Written results of preconstruction surveys must be received by the CPUC within five days after survey completion and prior to the start of ground disturbance or construction activities.
- During construction, LSPGC and PG&E shall observe the following measures throughout the project alignment area to minimize impacts on San Joaquin kit fox:
  - Artificial lighting of construction sites in the project alignment area during nighttime hours shall be limited to the extent feasible.
  - All pipes, culverts, or similar structures with a diameter of 4 inches or greater shall be inspected for kit foxes before they are buried, capped, used, or moved in any way.
  - All trash shall be properly disposed of and removed from the construction site at least once a week.
  - No firearms shall be allowed on the construction site.
  - No pets shall be permitted on the construction site.
  - Use of rodenticides and herbicides in project areas shall be restricted.
  - Plastic mono-filament matting shall not be used for erosion control or other purposes. Instead, tightly woven fiber or similar material shall be used.
  - If a kit fox is trapped:
    - Personnel shall immediately report the incident to the project biologist.
    - Escape ramps or structures shall be installed immediately.
    - If the fox cannot escape, USFWS and CDFW shall be contacted for guidance.
    - The onsite representative shall notify USFWS and CDFW by telephone or email within 24 hours.
  - If a kit fox is injured or killed:
    - Personnel shall immediately report the incident to project biologist.
    - Project activities shall cease until USFWS and CDFW provide guidance.

- The onsite representative shall notify USFWS and CDFW immediately with the date, time, and location of the incident.
- Consultation with USFWS shall be reinitiated.

In response to Comments A2-5, A2-6, A2-7, and A2-12, revisions have been added to the "Biological Resources" section on pages 3-106 and 3-107 of the Final IS/MND:

Original:

Implementation of Construction Measures BIO-A through BIO-H and Mitigation Measures BIO-2 through BIO-7, described above, would require surveys and impact avoidance measures for blunt-nosed leopard lizards and other special-status reptiles, western spadefoot toads, burrowing owls, Crotch's bumble bees, Tulare grasshopper mice, as well as incorporation of survey area minimums, survey timing standards, and applicable protocols for special-status and common bird surveys conducted pursuant to APMs BIO-18 and BIO-20 and CM BIO-6. Incidental take permitting and compliance with permit requirements would be required if impacts on certain species (blunt-nosed leopard lizard, Crotch's bumble bee) could not be avoided, which may include compensatory mitigation and would fully mitigate impacts on these species pursuant to the CESA. Therefore, with implementation of mitigation measures, impacts on these special-status wildlife would be **less than significant**.

Revised:

Implementation of Construction Measures BIO-A through BIO-J and Mitigation Measures BIO-2 through BIO-9, described above, would require surveys and impact avoidance measures for blunt-nosed leopard lizards and other special-status reptiles, western spadefoot toads, burrowing owls, Crotch's bumble bees, giant kangaroo rat, San Joaquin antelope squirrel, American badger, and San Joaquin kit fox as well as incorporation of survey area minimums, survey timing standards, and applicable protocols for special-status and common bird surveys conducted pursuant to APMs BIO-18 and BIO-20 and CM BIO-6. Incidental take permitting and compliance with permit requirements would be required if impacts on certain species (blunt-nosed leopard lizard, Crotch's bumble bee, giant kangaroo rat, San Joaquin antelope squirrel, and San Joaquin kit fox) could not be avoided, which may include compensatory mitigation and would fully mitigate impacts on these species pursuant to the CESA. Therefore, with implementation of mitigation measures, impacts on these special-status wildlife would be **less than significant**.

As a result of findings in the amendment to the BRTR (Insignia Environmental 2025) the following measure has been removed from the Biological Resources" section on page 3-108 of the Final IS/MND:

Original:

Construction Measure BIO-I [PG&E] / Mitigation Measure BIO-8 [LSPGC]: Identify State or Federally Protected Wetlands in Unsurveyed Areas

If, after implementation of APM BIO-1 (LSPGC) or CM GEN-1 (PG&E), it is determined that state or federal wetlands may be present in unsurveyed portions of the project alignment area, LSPGC and/or PG&E shall retain a qualified biologist, hydrologist, or wetland ecologist approved by the CPUC to prepare a formal delineation of the boundaries of state or federally protected wetlands that are within the project alignment area and may be directly or indirectly adversely affected according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the Arid West regional supplement (Environmental Laboratory 2008). The qualified biologist will also delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (SWRCB 2021).

Revised:

N/A

3.7 REVISIONS TO SECTION 3.5, "CULTURAL RESOURCES"

In response to additional cultural resources surveys that were completed for the project alignment page 3-112 of the Final IS/MND has been revised as follows:

Original:

The following regional and historic era setting information is based on the *Cultural Resources Assessment for the Manning 500/230KV Substation Project, Fresno County, California*, prepared by LSPGC for the project and reviewed by Ascent (Chronicle Heritage 2024).

Revised:

The following regional and historic era setting information is based on the *Cultural Resources Assessment for the Manning 500/230KV Substation Project, Fresno County, California*, prepared by LSPGC for the project and reviewed by Ascent (Chronicle Heritage 2024), and the *Addendum Report for Cultural Resources Assessment for 500/230KV Substation Project, Fresno County, California, January 18, 2024* Manning (Chronicle Heritage 2025).

In response to additional cultural resources surveys that were completed for the project alignment page 3-114 of the Final IS/MND has been revised as follows:

Original:

Chronicle Heritage conducted an intensive pedestrian survey of the project alignment between November 6 and November 28, 2023. The pedestrian survey was conducted using transects spaced between 10 and 15 meters apart. During the survey, the project alignment area was examined for the presence of historic or precontact period cultural materials. Historic period cultural materials include foundations, fence lines, ditches, standing buildings, objects, structures such as sheds, or concentrations of materials such as domestic refuse (e.g., glass bottles, ceramics, toys, buttons, and leather shoes), refuse from other pursuits such as agriculture (e.g., metal tanks, farm machinery parts, and horseshoes), or structural materials (e.g., nails, glass windowpanes, corrugated metal, wood posts or planks, metal pipes and fittings). Precontact site cultural materials include midden, ash, and charcoal deposits, as well as faunal bone (burned or unburned), shell, flaked stone, ground stone, and human remains.

The pedestrian survey covered approximately 1,859 acres of the 3,229 acres that compose the project alignment area. Multiple areas of the project alignment have not yet been surveyed due private property access restrictions (Chronicle Heritage 2024). The pedestrian survey did not identify any new cultural resources

Revised:

Chronicle Heritage conducted an intensive pedestrian survey of the project alignment between November 6 and November 28, 2023. Additional intensive pedestrian surveys were conducted between March 24 and April 1, 2025, to access parcels that could not be surveyed in 2023 due to private ownership and inability to access. The pedestrian surveys were conducted using transects spaced between 10 and 15 meters apart. During the surveys, the project alignment area was examined for the presence of historic or precontact period cultural materials. Historic period cultural materials include foundations, fence lines, ditches, standing buildings, objects, structures such as sheds, or concentrations of materials such as domestic refuse (e.g., glass bottles, ceramics, toys, buttons, and leather shoes), refuse from other pursuits such as agriculture (e.g., metal tanks, farm machinery parts, and horseshoes), or structural materials (e.g., nails, glass windowpanes, corrugated metal, wood posts or planks, metal pipes and fittings). Precontact site cultural materials include midden, ash, and charcoal deposits, as well as faunal bone (burned or unburned), shell, flaked stone, ground stone, and human remains.

The pedestrian surveys covered approximately 2,720 acres of the 3,229 acres that compose the project alignment area. Some areas of the project alignment have not yet been surveyed due private property access restrictions (Chronicle Heritage 2024; 2025). The pedestrian survey did not identify any new cultural resources.

3.8 REVISIONS TO SECTION 3.6, "ENERGY"

In response to Comment O2-15, revisions have been added to Table 3.6-2 on page 3-133 of the Final IS/MND:

Original:

Table 3.6-2 Summary of Estimated Fuel Consumption During LSPGC and PG&E Construction

Vehicle Type	Gasoline Consumption (gallons)	Diesel Consumption (gallons)	Jet Fuel Consumption (gallons)
Construction			
Worker vehicles	98,059	0	0
Construction vehicles	29,895	120,269	0
Construction equipment	0	330,519	0
Helicopter and support	0	0	287,408
Construction total	127,954	450,788	287,408
Operation and Maintenance			
Construction equipment	0	235,512	0

Source: Modeling performed by Insignia Environmental in 2024.

Revised:

Revised Table 3.6-2 Summary of Estimated Fuel Consumption During LSPGC and PG&E Construction

Vehicle Type	Gasoline Consumption (gallons)	Diesel Consumption (gallons)	Jet Fuel Consumption (gallons)
Construction			
Worker vehicles	98,059	0	0
Construction vehicles	29,895	120,269	0
Construction equipment	0	330,519	0
Helicopter and support	0	0	287,408
Construction total	127,954	450,788	287,408
Operation and Maintenance			
Construction equipment	0	220	0

Source: Modeling performed by Insignia Environmental in 2024.

3.9 REVISIONS TO SECTION 3.7, "GEOLOGY AND SOILS"

In response to Comment O2-16, clarifications have been added to the geology and soils section on page 3-147 of the Final IS/MND:

Original:

The total area of new permanent impacts created by the LSPGC project components would be 3.8 acres. Overland flows onto these LSPGC project components are not expected given the relatively flat terrain.

Revised:

The area of new permanent impacts created by the LSPGC transmission alignment components would be 3.8 acres. The proposed Manning Substation would include permanent impacts on 29 acres of the substation site for ancillary facilities, including an access road, telecom yard, and staging area, as well as permanent

impacts on 11 acres of the substation site for the primary facilities. Overland flows onto these LSPGC project components are not expected given the relatively flat terrain.

In response to Comment O2-17, clarifications have been added to the "Geology and Soils" section on pages 3-148 and 3-149 of the Final IS/MND:

Original:

Telecommunication poles would be installed to depths of approximately 10–50 feet, depending on the type of pole structure and location, which would prevent shifting as a result of soil expansion or collapse. In addition, all new structures associated with the project would be constructed in compliance with the most current version of the CBC, which includes requirements to address expansive soils. Specifically, Chapter 18 of the CBC regulates the excavation of foundations, and Chapter 18A regulates construction on unstable soils, such as expansive soils. The CBC contains a provision that requires completion of a geotechnical investigation, including a preliminary soil report to identify "the presence of critically expansive soils or other soil problems which, if not corrected, would lead to structural defects" (CBC Chapter 18, Section 1803.1.1.1). The geotechnical investigation must include, among other requirements, a record of the soil profile, as well as recommendations for foundation type and design criteria that address issues such as (but not limited to) bearing capacity of soils, provisions to mitigate the effects of expansive soils, liquefaction, settlement, and varying soil strength. CBC Chapter 18, Section 1803.1.1.3 states that if a building department or other appropriate enforcement agency determines that recommended actions presented in the geotechnical investigations are likely to prevent structural damage, the approved recommended actions must be made a condition to the building permit. Therefore, compliance with the CBC would ensure that construction of the project components would not create substantial direct or indirect risks to property from being located on expansive soils.

Revised:

Transmission poles or structures would be installed to depths of approximately 10–50 feet, depending on the type and location of the pole or structure, which would prevent shifting as a result of soil expansion or collapse. In addition, all new structures associated with the project would be constructed in compliance with the most current version of the CBC, which includes requirements to address expansive soils. Specifically, Chapter 18 of the CBC regulates the excavation of foundations, and Chapter 18A regulates construction on unstable soils, such as expansive soils. The CBC contains a provision that requires completion of a geotechnical investigation, including a preliminary soil report to identify "the presence of critically expansive soils or other soil problems which, if not corrected, would lead to structural defects" (CBC Chapter 18, Section 1803.1.1.1). The geotechnical investigation must include, among other requirements, a record of the soil profile, as well as recommendations for foundation type and design criteria that address issues such as (but not limited to) bearing capacity of soils, provisions to mitigate the effects of expansive soils, liquefaction, settlement, and varying soil strength. Therefore, completion of and compliance with the requirements in the geotechnical investigation would ensure that construction of the project components would not create substantial direct or indirect risks to property from being located on expansive soils.

In response to Comment O2-18 clarification has been added to the "Geology and Soils" section on page 3-152 of the Final IS/MND:

Original:

Specifically, the pulling site associated with the proposed PG&E 500 kV Interconnections would be located in an area underlain by the Tulare Formation that has high paleontological sensitivity. Excavation and ground-disturbing activities associated with construction of the pulling site for the PG&E 500 kV Interconnections would have the potential to encounter paleontological resources.

Revised:

Specifically, the pulling site associated with the proposed PG&E 500 kV Interconnections would be located in an area underlain by the Tulare Formation that has high paleontological sensitivity. Ground-disturbing

activities, such as grubbing and limited grading, associated with construction of the pulling site for the PG&E 500 kV Interconnections would have the potential to encounter paleontological resources.

3.10 REVISIONS TO SECTION 3.8, "GREENHOUSE GAS EMISSIONS"

In response to Comment O2-19, clarifications have been added to the "Greenhouse Gas Emissions" section on page 3-160 of the Final IS/MND:

Original:

While most operational activities would be managed off-site, regular maintenance for the LSPGC and PG&E facilities would include quarterly and annual inspections, depending on the facility.

Revised:

While most operational activities would be managed off-site, regular maintenance for the LSPGC and PG&E facilities would include quarterly and annual inspections, depending on the facility. LSPGC and PG&E would have their own crews to inspect and repair their respective project components.

3.11 REVISIONS TO SECTION 3.9, "HAZARDS AND HAZARDOUS MATERIALS"

In response to Comment O2-20, revisions have been added to the "Hazards and Hazardous Materials" section on page 3-165 of the Final IS/MND:

Original:

The project alignment area is not located in an area of high fire hazard. According to the CAL FIRE maps, the project alignment would be in both an LRA and an SRA (CAL FIRE 2024).

Revised:

The majority of the project alignment area is not located in an area of high fire hazard, with the exception of a 0.4-mile portion of the PG&E 500 kV Interconnection that crosses a high fire hazard severity zone. According to the CAL FIRE maps, the project alignment would be in both an LRA and an SRA (CAL FIRE 2024).

In response to Comment O2-21, clarifications have been added to the "Hazards and Hazardous Materials" section on page 3-176 of the Final IS/MND:

Original:

The LSPGC project components' design specifications and operation and maintenance procedures would minimize the potential for the release of hazardous materials, specifically from the mineral oil contained in the transformers and lead-acid batteries from the Manning Substation. An SPCC Plan would be required in accordance with CFR Title 40, Parts 112.1–112.7 and would address the project spill prevention and containment design measures and practices.

Revised:

The LSPGC project components' design specifications and operation and maintenance procedures would minimize the potential for the release of hazardous materials, specifically from the mineral oil contained in the transformers and lead-acid batteries from the Manning Substation. In the event that a discharge occurs, an SPCC Plan would be required in accordance with CFR Title 40, Parts 112.1–112.7 and would address the project spill prevention and containment design measures and practices.

In response to Comments O2-23 and O-34, and O-25, revisions have been added to the "Hazards and Hazardous Materials" section on page 3-180 of the Final IS/MND:

Original:

As previously discussed in Section 3.9.1, the portion of the project alignment west of I-5 would be located within a CAL FIRE FHSZ designated as moderate. The nearest high FHSZ would be located approximately 1 mile south of the project alignment area. The project would not be located in a CPUC-designated HFTD. The project alignment area is relatively flat and developed for agricultural and residential uses. The primary risk for potential fire hazards would be associated with the use of vehicles and equipment during construction that could generate heat or sparks that could ignite dry vegetation and result in a fire.

The construction of the Manning Substation and new distribution lines could increase wildfire risk above baseline conditions. With any electrified equipment, there is potential for accidental ignition of nearby vegetation, particularly during high fire hazard conditions and times of the year. However, the project alignment area is located within existing or to-be-acquired rights-of-way where vegetation has been previously or would be cleared or trimmed and is not designated very high or high FHSZ. Furthermore, vehicles and equipment would primarily use existing roads.

Based on the moderate CAL FIRE FHSZs within and surrounding the project alignment area, construction personnel could be exposed to a wildland fire during project construction.

Revised:

As previously discussed in Section 3.9.1, there are no project components are located within a VHFHSZ. However, an approximately 0.4-mile portion of the PG&E 500 kV interconnections cross a high FHSZ and the remaining portion of the project alignment west of I-5 would be located within a CAL FIRE FHSZ designated as moderate. The nearest VHFHSZ would be located approximately 1 mile south of the project alignment area. The project would not be located in a CPUC-designated HFTD. The project alignment area is relatively flat with an average grade of less than 1 percent and developed for agricultural and residential uses. The primary risk for potential fire hazards would be associated with the use of vehicles and equipment during construction that could generate heat or sparks that could ignite dry vegetation and result in a fire.

The construction of the Manning Substation and new distribution lines could increase wildfire risk above baseline conditions. With any electrified equipment, there is potential for accidental ignition of nearby vegetation, particularly during high fire hazard conditions and times of the year. However, the project alignment area is located within existing or to-be-acquired rights-of-way where vegetation has been previously or would be cleared or trimmed and is not designated VHFHSZ. Furthermore, vehicles and equipment would primarily use existing roads.

Based on the CAL FIRE FHSZs within and surrounding the project alignment area, construction personnel could be exposed to a wildland fire during project construction.

In response to Comment O2-26, revisions have been added to the "Hazards and Hazardous Materials" section on page 3-181 of the Final IS/MND:

Original:

The project alignment area has a low to moderate risk of wildland fire based on mapping conducted by CAL FIRE and the CPUC. Implementation of CM GEN-1 would require that the project maintain acceptable clearances around the substation site and between the distribution lines and other vegetation to minimize the risk of the energized lines igniting wildfires.

Revised:

The project alignment area has a risk of wildland fire based on mapping conducted by CAL FIRE and the CPUC. Implementation of CM GEN-1 would require that the project maintain acceptable clearances around the substation site and between the distribution lines and other vegetation to minimize the risk of the energized lines igniting wildfires.

In response to Comment O2-27, new analysis has been added to the "Hazards and Hazardous Materials" section on page 3-181 of the Final IS/MND:

Original:

N/A

Revised:

h) Create a significant hazard to air traffic from the installation of new power lines and structures?

LSPGC and PG&E Project Components

All proposed LSPGC and PG&E project components would not pose a hazard to air traffic according to the FAA Notice Criteria Tool (FAA 2025). Therefore, LSPGC and PG&E project components would not result in a significant hazard to air traffic, resulting in no impact.

In response to Comment O2-28, clarifications have been added to the "Hazards and Hazardous Materials" section on page 3-182 of the Final IS/MND:

Original:

In coordination with the FAA Flight Standards District Office, LSPGC, and PG&E would develop and implement a Helicopter Use and Safety Plan in accordance with Title 14, Parts 77 and 133 of the CFR, prior to project construction, and submit it to the CPUC for review and approval. Through these activities and agency coordination, LSPGC would eliminate the potential for creating a significant hazard to the public or environment through the transport of heavy materials using helicopters.

…

In coordination with the FAA Flight Standards District Office, PG&E would develop and implement a Helicopter Use and Safety Plan in accordance with Title 14, Parts 77 and 133 of the CFR, prior to project construction, and submit it to the CPUC for review and approval.

Revised:

In coordination with the FAA Flight Standards District Office, LSPGC would develop and implement a Helicopter Use and Safety Plan in accordance with Title 14, Parts 77 and 133 of the CFR, prior to helicopter usage, and submit it to the CPUC for review. Through these activities and agency coordination, LSPGC would eliminate the potential for creating a significant hazard to the public or environment through the transport of heavy materials using helicopters.

…

In coordination with the FAA Flight Standards District Office, PG&E would develop and implement a Helicopter Use and Safety Plan in accordance with Title 14, Parts 77 and 133 of the CFR, prior to helicopter usage, and submit it to the CPUC for review.

3.12 REVISIONS TO SECTION 3.10, "HYDROLOGY AND WATER QUALITY"

In response to Comment O2-29, clarifications have been added to the "Hydrology and Water Quality" section on page 3-197 of the Final IS/MND:

Original:

Typical BMPs would include installation of filter fences, fiber rolls, and erosion control blankets to prevent erosion and sedimentation. Pursuant to the SWPPPs, BMPs would remain in place and would be maintained until new vegetation is established. In addition, as part of the project, LSPGC would prepare a Hazardous Materials Management Plan (HMMP), and the HMMP would be submitted to the CPUC for review and approval prior to any construction activities. As discussed in Section 2.8.11, "Hazardous Materials and

Management," the HMMP would require all hazardous materials to be stored, handled, and used in accordance with applicable regulations, thereby reducing impacts on water quality through control of pollutants during construction.

Revised:

Typical BMPs would include installation of filter fences, fiber rolls, and erosion control blankets to prevent erosion and sedimentation. Pursuant to the SWPPPs, BMPs would remain in place and would be maintained until new vegetation is established. In addition, as part of the project and prior to construction, LSPGC and PG&E would each prepare a Hazardous Materials Management Plan (HMMP), and each HMMP would describe hazardous materials use, transport, storage, management, and disposal protocols consistent with Title 24, Part 9 of the CCR. The HMMPs would be submitted to the CPUC for review prior to any construction activities. As discussed in Section 2.8.11, "Hazardous Materials and Management," the HMMP would require all hazardous materials to be stored, handled, and used in accordance with applicable regulations, thereby reducing impacts on water quality through control of pollutants during construction.

3.13 REVISIONS TO SECTION 3.19, "UTILITIES AND SERVICE SYSTEMS"

In response to Comment O2-33, clarifications have been added to the "Utilities and Service Systems" section on page 3-266 of the Final IS/MND:

Original:

All stormwater runoff from the Manning Substation would be filtered through the surrounding soil or evaporate during operation and maintenance. The project components other than the Manning Substation would not result in an increase of impervious surface that would result in generation of stormwater runoff, and no facilities would be needed during operation and maintenance.

Revised:

All stormwater runoff from the Manning Substation would be filtered through the surrounding soil or evaporate during operation and maintenance. The project components other than the foundation and pads of the Manning Substation would not result in an increase of impervious surface that would result in generation of stormwater runoff, and no facilities would be needed during operation and maintenance.

3.14 REVISIONS TO SECTION 3.20, "WILDFIRE"

In response to Comment O2-34, revisions have been added to the "Wildfire" section on pages 3-271 and 3-275 of the Final IS/MND:

Original:

According to mapping conducted by CAL FIRE and the CPUC, the proposed project alignment area has a low risk for wildland fire. The proposed project alignment area is located within both Local Responsibility Area (LRA) and State Responsibility Area (SRA) lands.

…

As shown on Figure 3.20-1, the project alignment area west of I-5 is not located within a High Fire Hazard Severity Zone (HFHSZ) or Very High Fire Hazard Severity Zone (VHFHSZ) in the SRA (CAL FIRE 2024). The nearest CAL FIRE–designated HFHSZs are located approximately 1 mile north of the proposed Manning Substation and approximately 1 mile north of the other PG&E and LSPGC project components (CAL FIRE 2024). In addition, according to the CAL FIRE Fire Hazard Severity Zone Viewer, there are no portions of the project alignment area within an identified fire hazard severity zone (CAL FIRE 2024).

Revised:

According to mapping conducted by CAL FIRE and the CPUC, the majority proposed project alignment area has a low risk for wildland fire. The proposed project alignment area is located within both Local Responsibility Area (LRA) and State Responsibility Area (SRA) lands.

…

As shown on Figure 3.20-1, an approximately 0.4-mile portion of the PG&E 500 kV Interconnection west of I-5 is located within a High Fire Hazard Severity Zone (HFHSZ). There are no portions of the project alignment area within a Very High Fire Hazard Severity Zone (VHFHSZ) in the SRA (CAL FIRE 2024). The nearest CAL FIRE–designated HFHSZs are located over 5 miles south of the proposed Manning Substation (CAL FIRE 2024).

In response to Comment O2-34, revisions have been added to the "Wildfire" section on pages 3-280 and 3-281 of the Final IS/MND:

Original:

No project components are located within a VHFHSZ. However, project components west of I-5 would be located in SRA. The topography along the project alignment area is generally flat with an average grade of less than 1 percent (CloudFire 2023). Fire risk would be higher along the portion of the project alignment west of I-5 due to increased fuels and slope west of the substation site.

…

The project alignment area has a low risk of wildland fire based on mapping conducted by CAL FIRE and the CPUC. Although the portion of the project alignment area west of I-5 is located in SRA lands, there are no project components located in or near land classified as VHFHSZ, and the topography of the area consists of generally flat land with minimal vegetation for fuel.

Revised:

No project components are located within a VHFHSZ. However, an approximately 0.4-mile portion of the PG&E 500 kV Interconnection is located within an HFHSZ. The topography along the project alignment area is generally flat with an average grade of less than 1 percent (CloudFire 2023). Fire risk would be higher along the portion of the project alignment west of I-5; specifically, the 0.4-mile portion of the PG&E 500 kV Interconnection is located within an HFHSZ, due to increased fuels and slope west of the substation site.

…

The majority of the project alignment area has a low risk of wildland fire based on mapping conducted by CAL FIRE and the CPUC. Although a 0.4-mile portion of the PG&E 500 kV Interconnection is located within an HFHSZ, there are no project components located in or near land classified as VHFHSZ, and the topography of the area consists of generally flat land with minimal vegetation for fuel.

3.15 REVISIONS TO SECTION 3.21, "MANDATORY FINDINGS OF SIGNIFICANCE"

In response to Comment Letter A2, revisions have been added to the "Mandatory Findings of Significance" section on pages 3-284 and 3-285 of the Final IS/MND:

Original:

As discussed in Section 3.4, "Biological Resources," implementation of LSPGC APMs BIO-1 through BIO-20 and AIR-2, as well as PG&E CMs BIO-1 through BIO-8, GEN-1, and AIR-2 and Construction Measures BIO-A through BIO-K and Mitigation Measures BIO-1 through BIO-10, would ensure that the project would not 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, substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

…

Impacts on special status plant species shall be avoided through LSPGC APMs BIO-1 through BIO-20 and AIR-2, as well as PG&E CMs BIO-1 through BIO-8, GEN-1, and AIR-2 and Construction Measures BIO-A through BIO-K and Mitigation Measures BIO-1 through BIO-10. The potential disturbance to special status plants, blunt-nosed leopard lizard and other special status reptiles, western spadefoot toad, special status and native birds, Crotch's bumble bee, and Tulare grasshopper mouse shall be avoided through Construction Measures BIO-A through BIO-K and Mitigation Measures BIO-1 through BIO-10 to survey for and avoid these species if found on or near the project alignment area.

Revised:

As discussed in Section 3.4, "Biological Resources," implementation of LSPGC APMs BIO-1 through BIO-20 and AIR-2, as well as PG&E CMs BIO-1 through BIO-8, GEN-1, and AIR-2 and Construction Measures BIO-A through BIO-L and Mitigation Measures BIO-1 through BIO-11, would ensure that the project would not 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, substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

…

Historical and ongoing agricultural, industrial, commercial, and residential development in the region surrounding the project alignment area have contributed to loss of natural habitats and declines in populations of special-status species. Although the project may result in impacts on biological resources, impacts on special-status species shall be avoided through LSPGC APMs BIO-1 through BIO-20 and AIR-2; PG&E CMs BIO-1 through BIO-8, GEN-1, and AIR-2; PG&E CMs BIO-A through BIO-K; and LSPGC Mitigation Measures BIO-1 through BIO-10. The potential disturbance to special status plants, blunt-nosed leopard lizard and other special status reptiles, western spadefoot toad, special status and native birds, Crotch's bumble bee, American badger, giant kangaroo rat, San Joaquin antelope squirrel, and San Joaquin kit fox shall be avoided through Construction Measures BIO-A through BIO-K and Mitigation Measures BIO-1 through BIO-10 to survey for and avoid these species if found on or near the project alignment area. These measures are designed to completely avoid biological resources, and where complete avoidance is not feasible, LSPGC and PG&E would obtain necessary incidental take permitting from CDFW and/or USFWS, which would likely require implementation of compensatory mitigation through habitat preservation or purchase of mitigation credits such that there would not be considerable incremental effects on these resources. Future projects in the region surrounding the project area would implement the same or similar measures to reduce impacts to less than significant under CEQA.

3.16 REVISIONS TO IS/MND APPENDIX A, "PROJECT MAPBOOK"

In response to Comment O1-16, revisions have been made to Project Element Map 3 of 23 on page A-3 of the Appendix A to Appendix 1:

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Original:

Source: Adapted by Ascent in 2024.

Project Element Map 3 of 23

Revised:

Source: Adapted by Ascent in 2024.

Revised Project Element Map 3 of 23

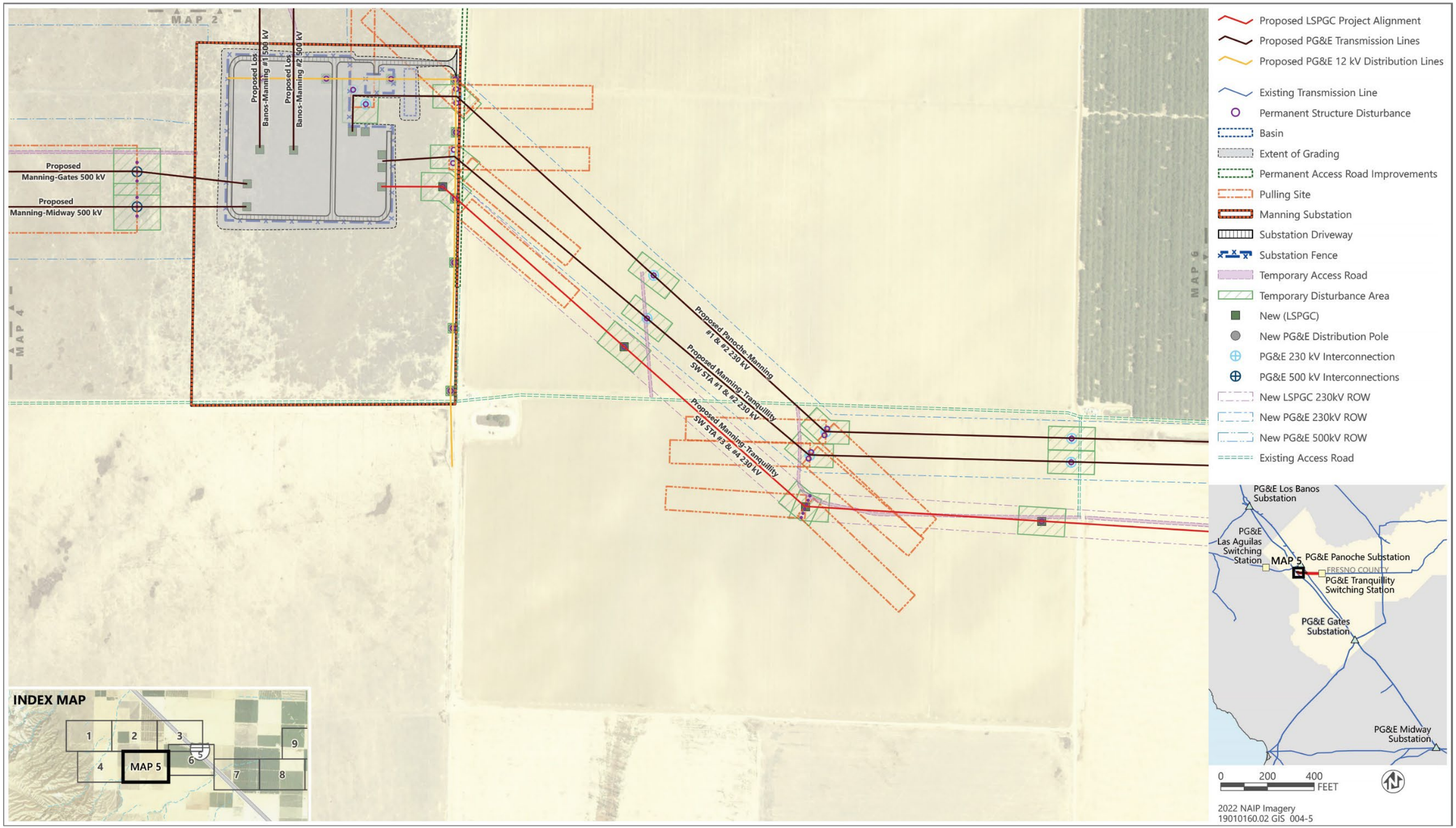
In response to Comment O1-16, revisions have been made to Project Element Map 5 of 23 on page A-5 of the Appendix A to Appendix 1:

Original:

Source: Adapted by Ascent in 2024.

Project Element Map 5 of 23

Revised:

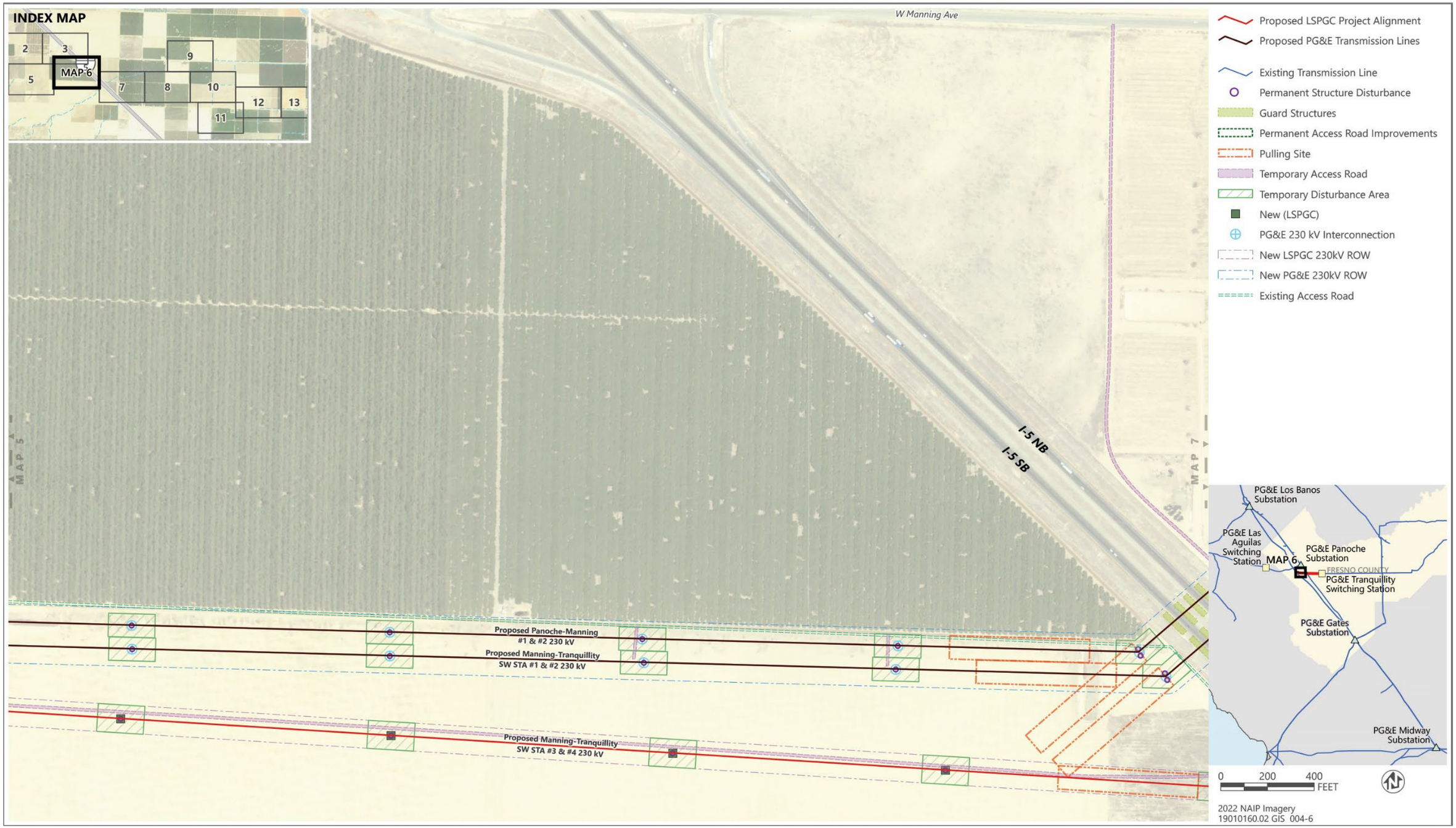


Source: Adapted by Ascent in 2024.

Revised Project Element Map 5 of 23

In response to Comment O1-16, revisions have been made to Project Element Map 6 of 23 on page A-6 of the Appendix A to Appendix 1:

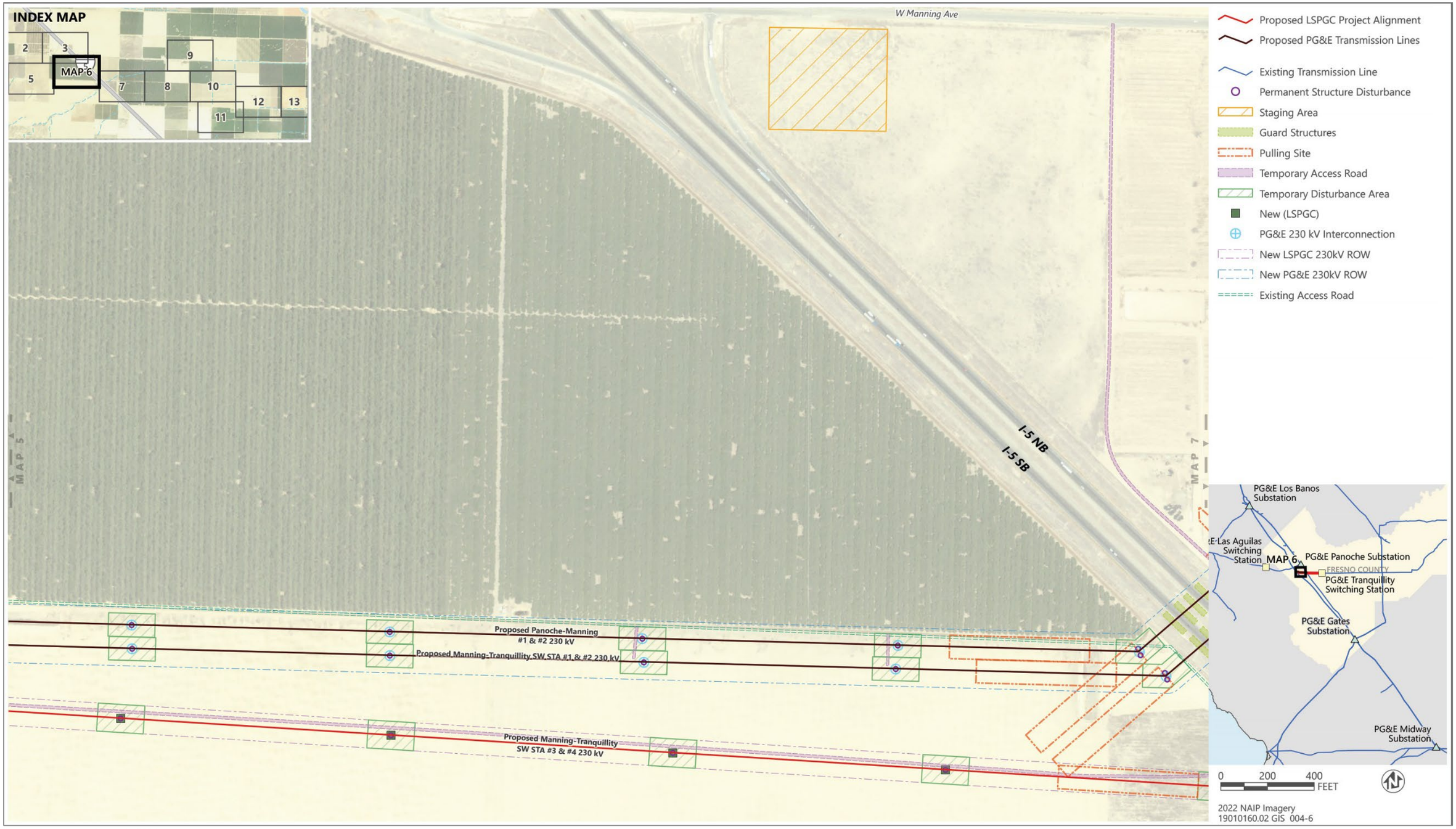
Original:



Source: Adapted by Ascent in 2024.

Project Element Map 6 of 23

Revised:

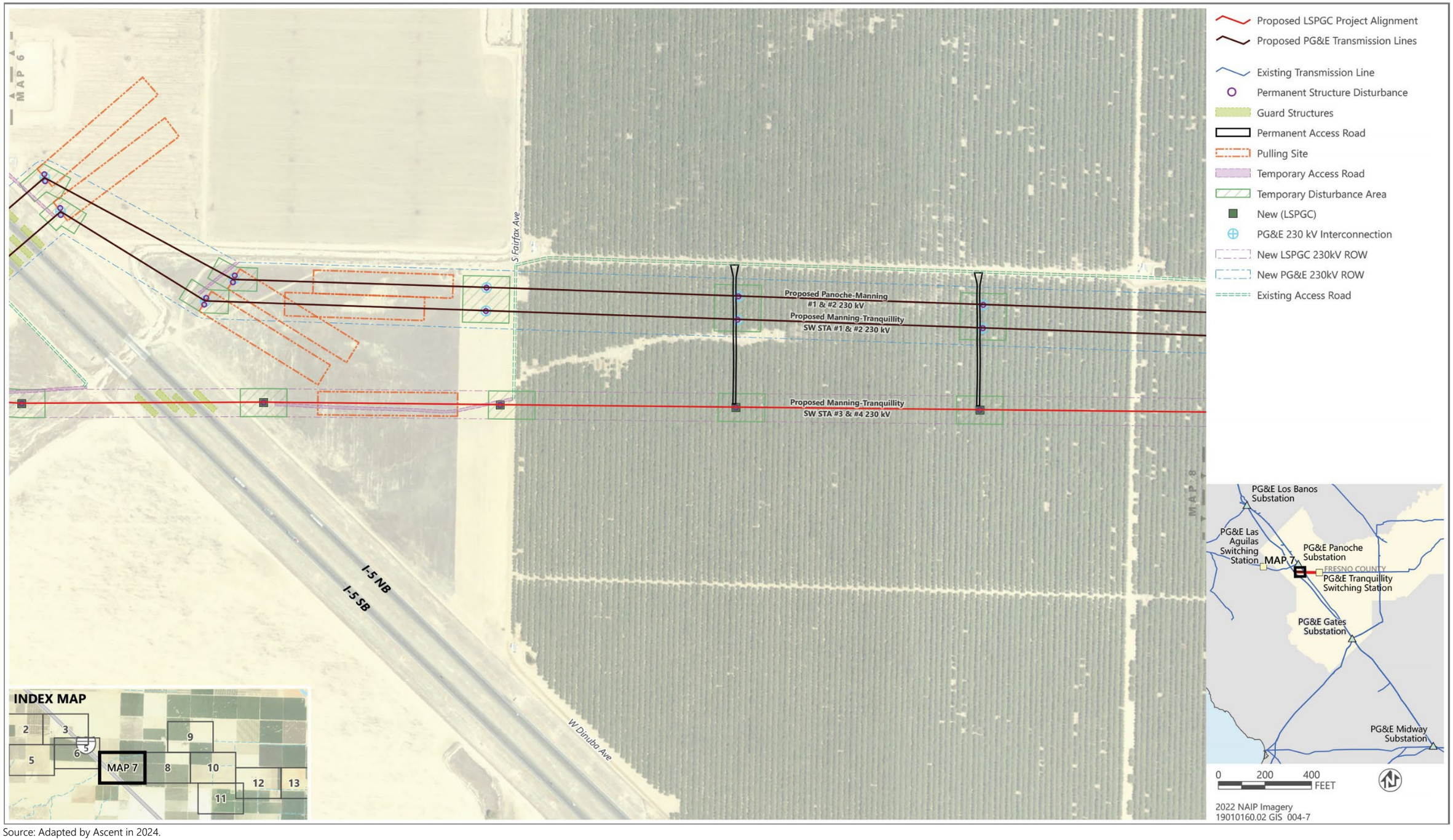


Source: Adapted by Ascent in 2024.

Revised Project Element Map 6 of 23

In response to Comment O1-17, revisions have been made to Project Element Map 7 of 23 on page A-7 of the Appendix A to Appendix 1:

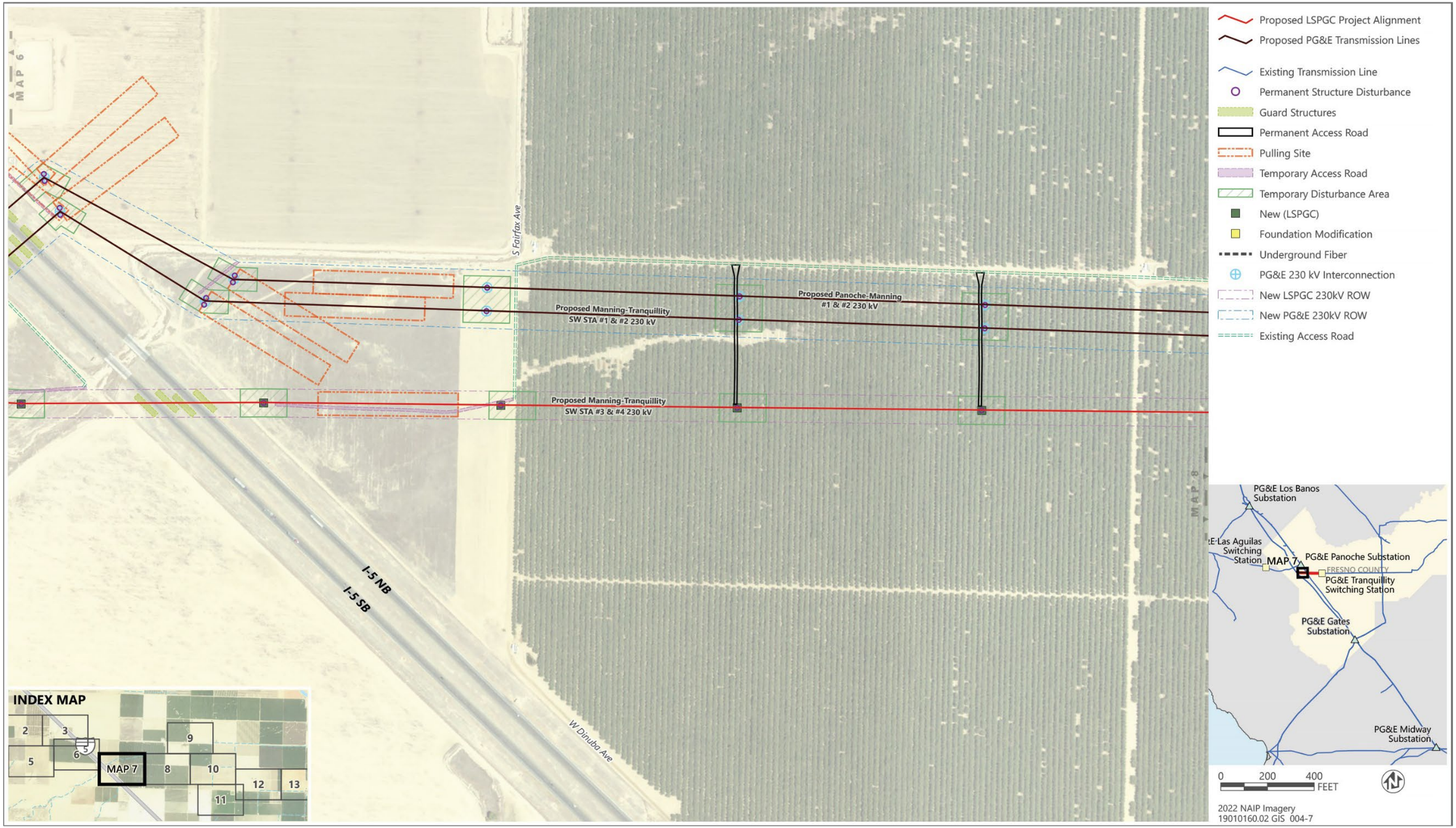
Original:



Source: Adapted by Ascent in 2024.

Project Element Map 7 of 23

Revised:

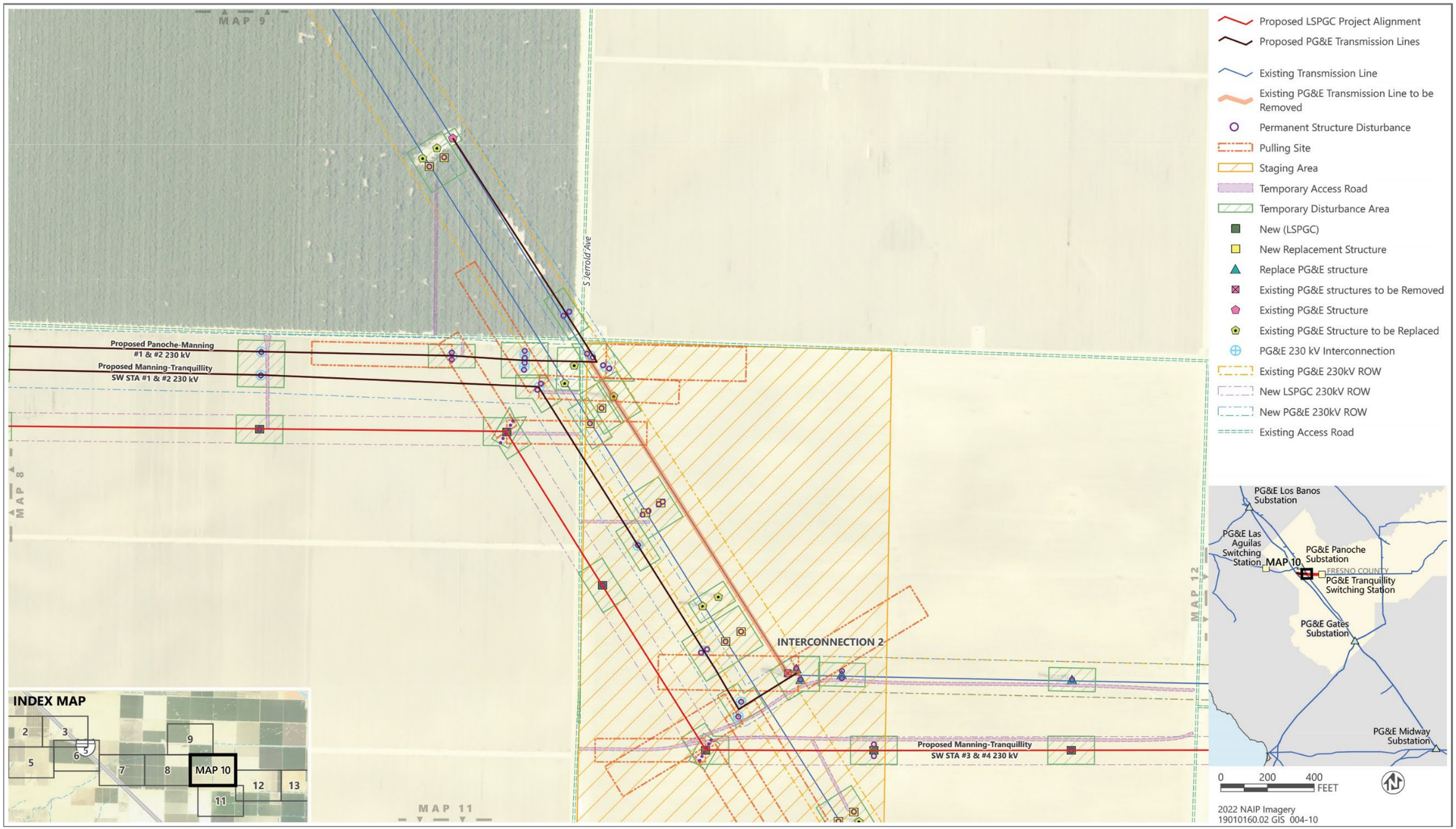


Source: Adapted by Ascent in 2024.

Revised Project Element Map 7 of 23

In response to Comment O1-15, revisions have been made to Project Element Map 10 of 23 on page A-10 of the Appendix A to Appendix 1:

Original:



Source: Adapted by Ascent in 2024.

Project Element Map 10 of 23

Revised:

Source: Adapted by Ascent in 2024.

Revised Project Element Map 10 of 23

In response to Comment O1-14, revisions have been made to Project Element Map 12 of 23 on page A-12 of the Appendix A to Appendix 1:

Original:

Source: Adapted by Ascent in 2024.

Project Element Map 12 of 23

Revised:

Source: Adapted by Ascent in 2024.

Revised Project Element Map 12 of 23

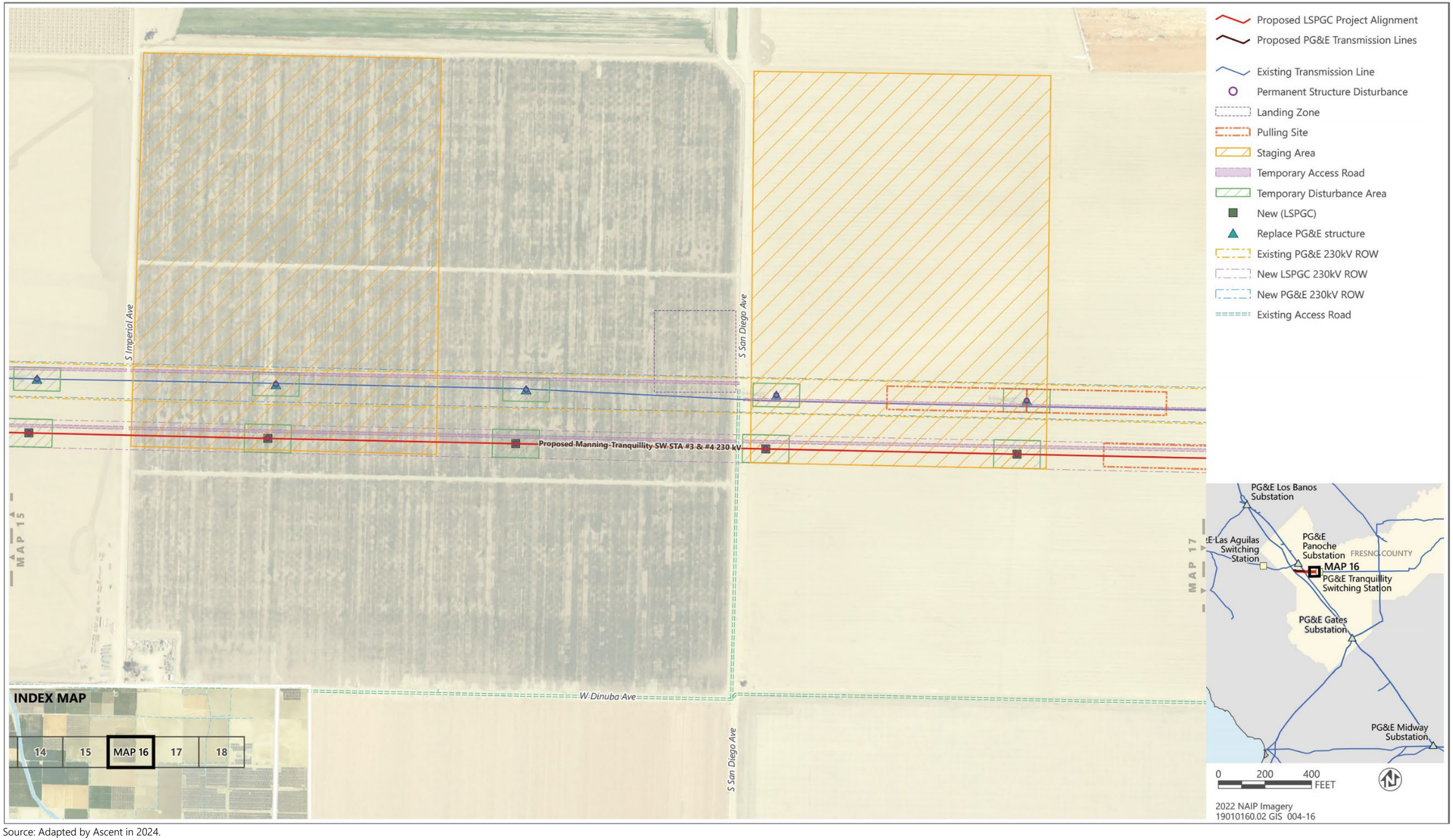
In response to Comment O1-14, revisions have been made to Project Element Map 16 of 23 on page A-16 of the Appendix A to Appendix 1:

Original:

Source: Adapted by Ascent in 2024.

Project Element Map 16 of 23

Revised:

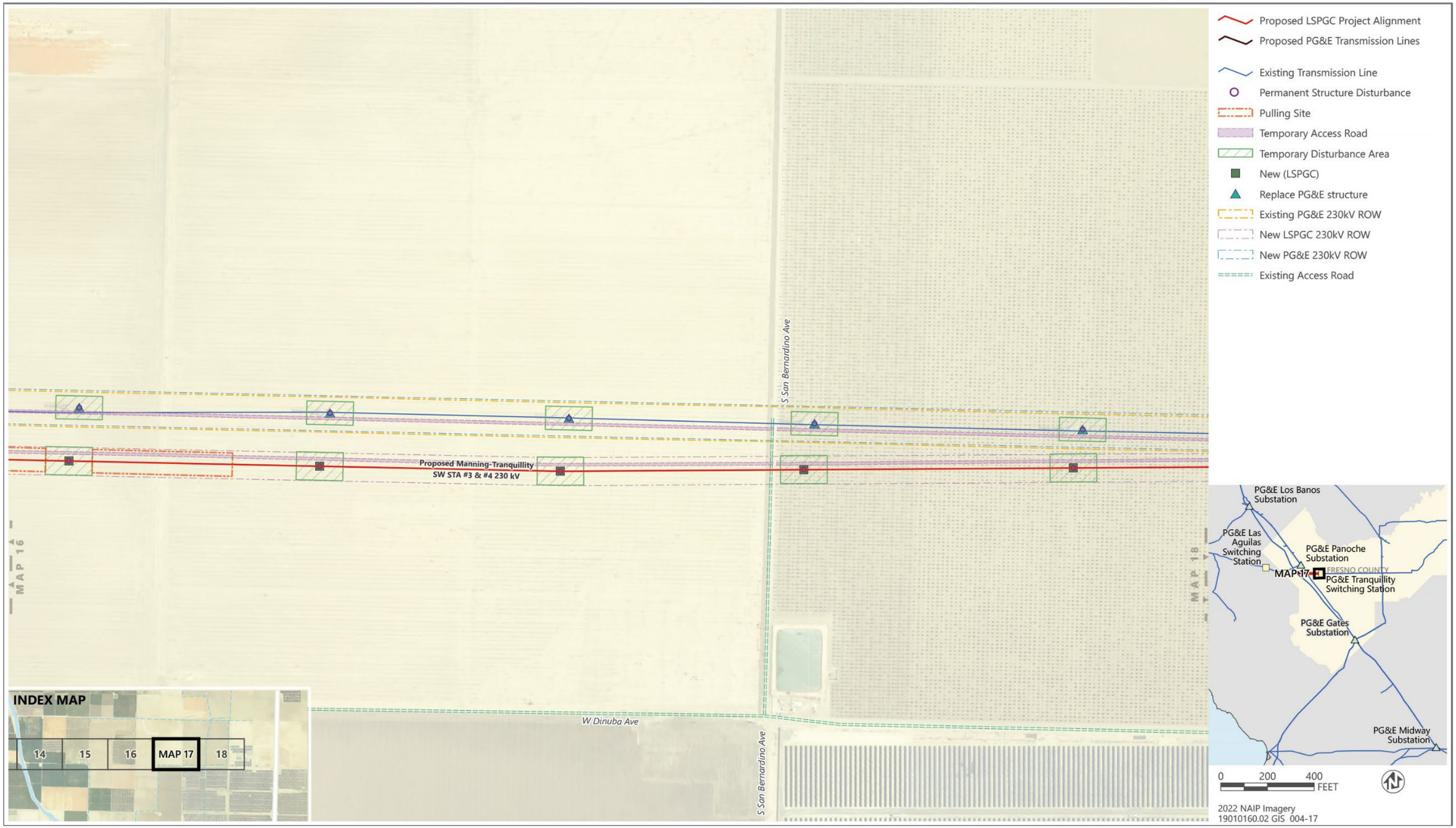


Source: Adapted by Ascent in 2024.

Revised Project Element Map 16 of 23

In response to Comment O1-13, revisions have been made to Project Element Map 17 of 23 on page A-17 of the Appendix A to Appendix 1:

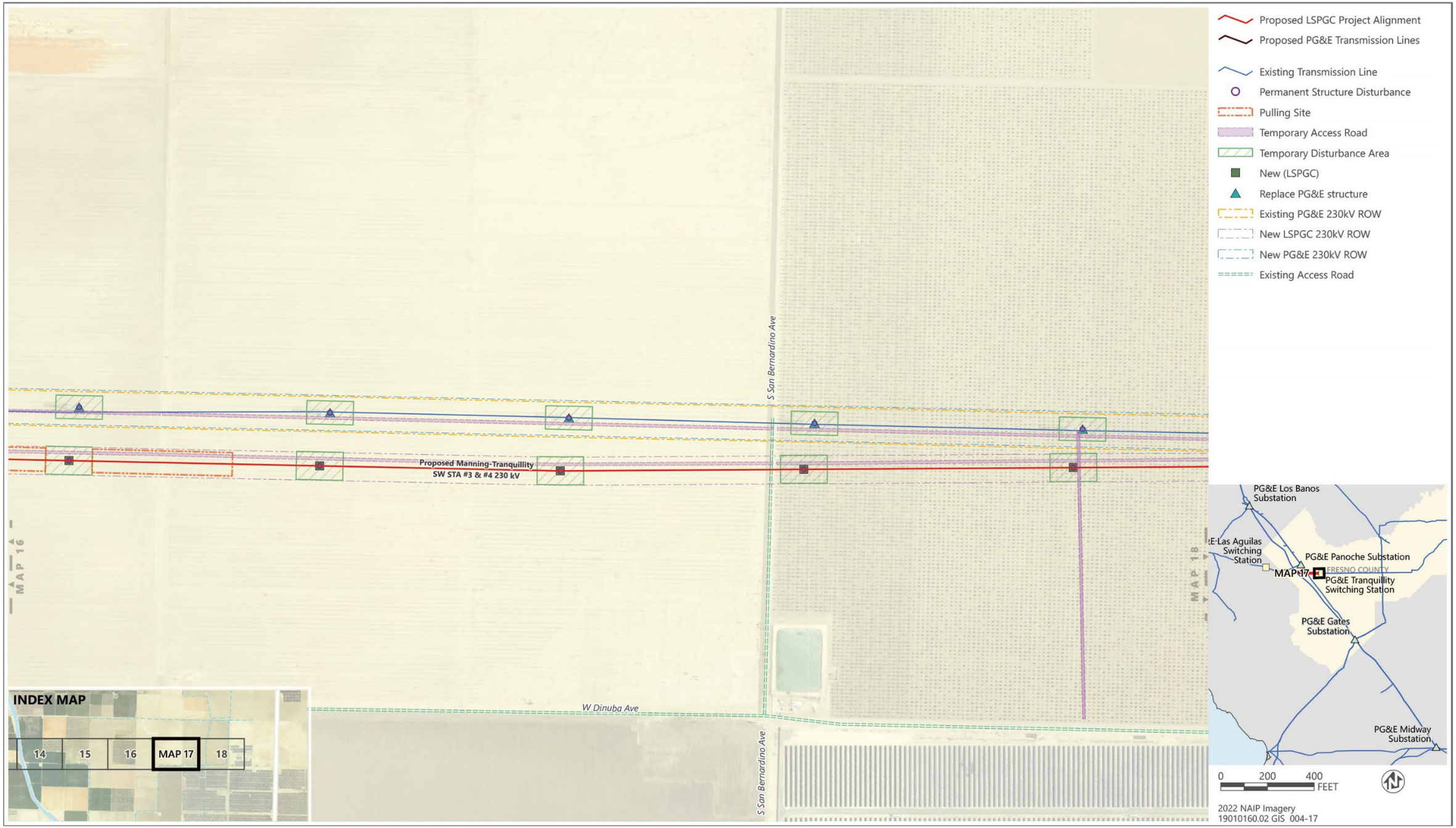
Original:



Source: Adapted by Ascent in 2024.

Project Element Map 17 of 23

Revised:



Source: Adapted by Ascent in 2024.

Revised Project Element Map 17 of 23

In response to Comment O1-8, revisions have been made to Project Element Map 19 of 23 on page A-19 of the Appendix A to Appendix 1:

Original:

Source: Adapted by Ascent in 2024.

Project Element Map 19 of 23

Revised:

Source: Adapted by Ascent in 2024.

Revised Project Element Map 19 of 23

4 REFERENCES

1 Introduction

No references were cited in this chapter.

2 Responses to Comments

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3 Revisions to the Proposed IS/MND

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FAA. *See* Federal Aviation Administration.

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5 LIST OF PREPARERS

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