

**Initial Study and
Mitigated Negative Declaration**

Pacific Gas & Electric Company

**Line 303 In-Line Inspection Repair
Project**

State Water Resources Control Board
401 Certification and Wetlands Unit
1001 I Street, 15th Floor, 55C
Sacramento, CA 95814

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Appendix B	Delineation of Wetlands and Waters of the United States for Pacific Gas and Electric Company’s Line 303In-Line Inspection Project prepared by Garcia and Associates dated May 2009
Appendix C	Cultural Resources Inventory Report for Line 303 ILI Inspection and Repair Project, Contra Costa and Alameda Counties, prepared by Garcia and Associates dated March 2009 and Memo to Chrisophe Descantes, PG&E from Garcia and Associates dated July 13, 2009 Regarding Archeological Testing Results for the Line 303 ILI Repair Project.
Appendix D	USFWS Biological Opinion Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009 and the Service’s January 26, 1999, Programmatic Formal Endangered Species Act Consultation on the Issuance of Permits under Section 404 of the Clean Water Act or Authorization under the Nationwide Permit Program for Projects that May Affect the California Red-legged Frog
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Mitigation Monitoring and Reporting Plan

1.0 PROJECT OVERVIEW

1.1 Project Proponent

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1.2 Lead Agency

State Water Resources Control Board
401 Certification and Wetlands Unit
1001 I Street, 15th Floor, 55C
Sacramento, CA 95814

Contact: Mr. Cliff Harvey, Environmental Scientist
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1.3 Jurisdictional Setting

In 1966 PG&E's installed Line 303, a 42.86 mile pipeline which runs from Antioch at the north and terminates at the Irvington Station in Milpitas. Line 303 is a major source of natural gas to the San Francisco Bay Area and the protection of this facility is crucial to the economy of the Bay Area, as well as safety to the general public living and working in the region. The operation and maintenance of the pipeline must comply with the Pipeline Integrity Rule and the pipeline is periodically audited to assure that PG&E is in compliance by the California Public Utilities Commission (CPUC) and U.S. Department of Transportation (DOT). The Pipeline Safety Improvement Act of 2002 (PSIA) (P.L. 107-355) administered by the DOT requires all operators of interstate and intrastate natural gas pipelines to perform regular inspections/assessments of their pipelines to assure continued safe operation of pipelines in higher risk areas. Upon the discovery any of anomalies in such inspections/tests, the operator is mandated by federal regulations (CFR 49 Part 192 Subpart O) to perform immediate repair upon those facilities which the data indicates the potential for internal or external corrosion, mechanical damage, dents or other changes.

The internal in-line inspection of Line 303 performed in April 2008 revealed three anomalies in the pipeline. As part of the verification of the in-line inspection results, an external direct examination of the pipeline is required. The objective of the external direct examination is to gather data to validate the in-line inspection results and verify the integrity of the pipeline. As a result of the external direct examination, a repair of the line may be required to restore the integrity of the pipeline. The repair of the pipeline typically involves excavation and exposure of a section of the 36-inch pipeline, removal of the pipeline coating, sandblasting, inspection of the pipeline, repair of the pipeline if required, recoating of the pipeline, subsequent reburial of the pipeline, and documentation of the examination.

PG&E plans to perform the external direct examination of the three anomalies in the pipeline in the Spring of 2010 once all necessary permits and approvals have been obtained. Prior to starting the in line inspection and repair work, PG&E must obtain a State Water Resource Control Board Section 401 Certification. The 401 Certification requires the completion of a California Environmental Quality Act (CEQA) review to issue the certification. The State Water

Resource Control Board is the lead agency for compliance with the provisions of CEQA for this project.

This Mitigated Negative Declaration and Initial Study have been prepared pursuant to the requirements of CEQA (Section 21000 et seq., Public Resources Code) and in accordance with the State CEQA Guidelines (Section 15000 et seq., Title 14, California Code of Regulations) with the State Water Resource Control Board as lead agency. The following Initial Study, Environmental Checklist (see Appendix E), and evaluation of potential environmental effects (see Section 2) were completed in accordance with Section 15063 (d) of the CEQA Guidelines to determine if the application for the Line 303 In Line Repair Project (Project) could have any potentially significant effect on the physical environment, and if so, what mitigation measures will be necessary to reduce such impacts to less-than significant levels.

With regard to the biological resources and cultural resources categories, the Project includes specific mitigation measures (see Section 2) which will reduce the potentially significant impacts to less-than-significant levels. No other environmental categories for this evaluation were found to be potentially affected in a significant manner by the Project.

The Project will also require a permit, authorization or review from the following agencies:

- Army Corps of Engineers (Corps) – Section 404 and Nationwide Permit 12. Concurrence of the use of the Nationwide Permit 12 is pending.
- United States Fish and Wildlife Service (USFWS) for Section 7 consultation and concurrence that the project can proceed under the Nationwide Permit Program. The USFWS on November 2, 2009 issued a Biological Opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S), which has determined that the project would be exempt from the prohibitions of section 9 of the Act, if the Corps shall ensure that PG&E complies with the terms and conditions of the Biological Opinion, which implements reasonable and prudent measure detailed in the Opinion.
- Consistency Determination from the California Department of Fish and Game (CDFG). PG&E has requested a Fish and Game Code Section 2080.1 Consistency Determination that the Biological Opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S) adequately mitigates adverse impacts on the San Joaquin kit fox and CDFG's concerns for protection of this species.

1.4 Project Location

The Project Area consists of three separate pipeline anomalies (Sites 1, 2, and 3). Sites 1 and 2 are located north and south of Camino Diablo Road, respectively, in Contra Costa County. Site 3 is located in Alameda County approximately two miles north of Interstate 580 and 0.45 miles west of Vasco Road near Livermore. Figure 1 shows the locations of the three sites. Access to sites 1 and 2 is via Camino Diablo Road, which is reached by driving south from Brentwood on Walnut Avenue to Camino Diablo and west on Camino Diablo to its intersection with the underground gas pipeline. Access to Site 3 is via a gated unpaved road located at the intersection of Ames Road and Raymond Road and is reached by taking the Vasco Road exit off Interstate 580 and heading north on Dalton Road, going west to Ames Road and take Ames Road north to its intersection with Raymond Road. The access road for Site 3 is underneath the Contra Costa-Los Positas 230 kV overhead electrical transmission line. Sites 1 and 2 are separated from Site 3 by a distance of approximately 9.8 miles.

Site 1 is owned by the State of California and Site 2 is owned by the State of California and Contra Costa Water District. The access for Site 2 is on the State of California's property. Site 3 is owned by a private party. Sites 1 and 2 are located in eastern Contra Costa County, just south of the community of Brentwood and west of Byron and Site 3 is located in eastern

Alameda County and northeast Livermore. PG&E owns easements across the lands where the three sites are located and has easement rights which allows for the construction, operation and maintenance of the natural gas pipeline. Besides the easements, PG&E also has rights to cross the affected parcels to access its easements. PG&E will provide the owners of the sites with notification regarding the proposed work prior to starting.

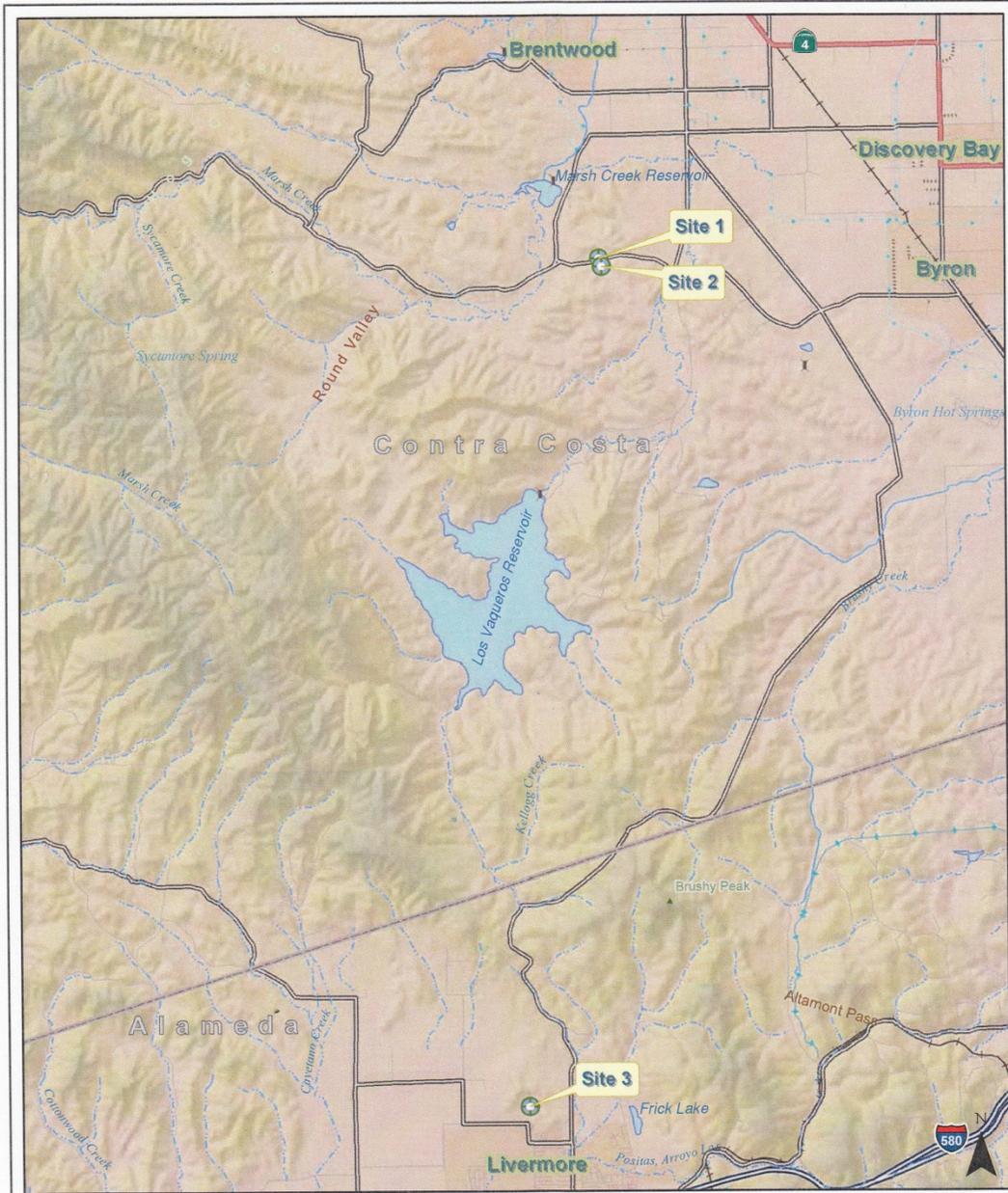
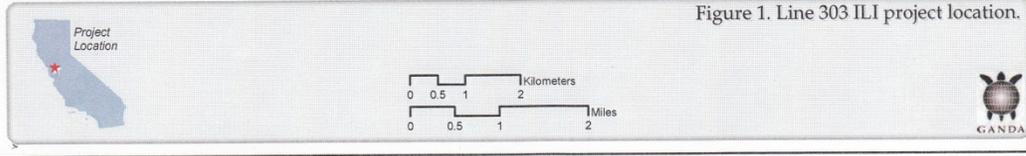


Figure 1. Line 303 ILI project location.



1.5 Project Description

The 2008 In-Line Inspection (ILI) of PG&E's 36-inch high pressure natural gas transmission Line 303 disclosed three anomalies requiring external direct examination and possible repair excavation and visual inspection to confirm whether or not remedial actions are necessary. PG&E proposes to excavate at these three locations to visually inspect the conditions of the pipeline, assess the corrosion protection around the pipeline, and if necessary repair the pipeline. Each pipeline anomaly will require an excavation area of approximately 10 long feet x 20 feet wide and 10 feet deep (2000 cubic feet or 74 cubic yards) to expose the pipe and facilitate inspection and repair work. Approximately 74 cubic yards of earth will be removed at each site, stockpiled along side of the pipe, within the work area and outside of any wetland areas, and the soil will be replaced once the inspection and repair work has been completed. The work area surrounding each anomaly will be approximately 50 feet by 50 feet and will be enclosed by exclusion fencing. PG&E will excavate soil from the area in layers and will stockpile each distinct layer in a separate pile. Layered soil will be replaced in the same order that they were removed. The temporarily impacted areas will then be restored to pre-construction conditions using a native seed mix appropriate for the area.¹

When direct examination of the pipeline is required, PG&E will then expose and remove the pipeline coating, sandblast and inspect the pipeline including measuring and recording metal loss on the surface of the pipe, and repair the pipeline if necessary. The pipeline will then be recoated with a protective epoxy coating, the pipe trench will be backfilled and the procedure documented for the records.

The temporary work area at each site will be approximately 50 feet in length and 50 feet wide (2,500 sq ft or 0.057 acres for each site or 0.172 acres for the three sites). Temporary access to Site 1 is immediate adjacent to Camino Diablo Road at which this road intersects the existing PG&E pipeline easement. The Site 2 temporary access route is 400 feet in length and 20 feet wide. The temporary access route is presently adequate for construction vehicle access and will not be graded. Access to Site 3 is located north of an existing Line 303 valve lot off Raymond Road and is 20-foot wide and approximately 800 feet long with approximately 1,200 square feet in a season wetland. Approximately 10-15 steel plates (8-feet by 12-feet each) will be placed across the route to minimize affects to the wetlands.²

1.6 Construction, Equipment, Materials and Staging Areas

PG&E proposes to excavate at these three locations to visually inspect the conditions of the pipeline, assess the corrosion protection around the pipeline, and if necessary repair the pipeline. Each pipeline anomaly will require an excavation area of approximately 10 long feet x 20 feet wide and 10 feet deep (2000 cubic feet or 74 cubic yards) to expose the pipe and facilitate inspection and repair work. The work area surrounding each anomaly will be approximately 50 feet by 50 feet and will be enclosed by exclusion fencing.

The work crew size will vary from 2 to 5 workers depending on the given task for the day. The work crew requiring a five person field crew would include a project foreman, backhoe operator, two laborers and a technician to perform the pipeline excavation, visual inspection, and any necessary repairs. The proposed in line inspection and repair work will take approximately one week at each site to complete. At each site, the pipeline will be exposed using a tracked excavator and front end loader. Construction equipment will include a backhoe, gas pipeline

1 USFWS Biological Opinion for the PG&E Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009

2 Ibid

service vehicles and pickups, water truck, tracked excavator and front end loader. Any soil excavated will be maintained on site and used as backfill. The spoils pile will be placed within the fenced work area near the excavation, outside of wetland areas. Work will be performed Monday through Friday from 7:30 a.m. to 5:00 p.m. The temporary impacted area will then be restored to pre-construction conditions using native seed mix appropriate for the area. Only construction equipment and materials will be staged at the job site – no trucks will be staged overnight.

1.7 Access

Crews will be limited to the existing access roads/routes. Temporary access to Site 1 is immediate adjacent to Camino Diablo Road at which this road intersects the existing PG&E pipeline easement. The Site 2 temporary access route is 400 feet length and 20 feet wide. The temporary access route is presently adequate for construction vehicle access and will not be graded. Access to Site 3 is located north of an existing Line 303 valve lot off Raymond Road and is 20-foot and approximately 800 feet long with approximately 1,200 square feet in a season wetland. Approximately 10-15 steel plates (8-feet by 12-feet each) will be placed across the route to minimize effects to the wetlands.³ All equipment and crews will be kept off environmentally sensitive habitat areas to the extent feasible.

1.8 Schedule

PG&E has currently scheduled the work for Spring 2010 (April or May), in the dry season and estimates that it will take approximate 2-3 weeks to complete the inspection and repair at all three sites, barring any unforeseen complications once the pipe has been exposed.

1.9 Impacts and Incidental Take

In November 2009 the Service issued its biological opinion for the proposed Gas Line 303 In Line Inspection (ILI) Repair Project and determined that the Project is not likely to jeopardize the continued existence of the California red-legged frog, California tiger salamander, San Joaquin kit fox, long horn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp current status. Although designated critical habitat for vernal pool fairy shrimp and proposed critical habitat for the California red-legged frog will be affected, none will be destroyed or adversely modified by the project.⁴ The Biological Opinion issued by the USFWS is included in Appendix D.

Additionally, pursuant to Section 9, the Service has identified conservation measures which must be implemented by the Corps and become binding conditions of the permit issued to PG&E in order for the exemption in Section 7(o)(2) to apply. The Service estimates that:

- all of the San Joaquin kit foxes inhabiting or utilizing areas with 0.5 acre will be subject to incidental take in the form of harm and harassment,
- all California tiger salamanders inhabiting 0.5 acres, will be subject to incidental take in the form of harm, harassment, capture, injury and death;
- all California red-legged frogs inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death; and
- all longhorn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp inhabiting 0.03 acre of seasonal wetlands will be subject to incidental take.

The Service has determined that upon the implementation of the Reasonable and Prudent Measures included in the Biological Opinion issued for the project, that incidental takes associated with the Gas Line 303 ILI for each of the above species will become exempt from the prohibitions described under Section 9 of the Endangered Species Act (Act).

³ Ibid

1.10 Avoidance, Minimization, Conservation, and Reasonable and Prudent Measures Incorporated into the Project

The Service has determined that the following reasonable and prudent measures are necessary and appropriate to minimize the effects of the Gas Line 303 ILI Repair project on California red-legged frog, California tiger salamander, San Joaquin kit fox, longhorn fairy shrimp, vernal pool fairy shrimp and vernal pool tadpole shrimp:⁴

1. PG&E will implement the conservation measures as described in the biological opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S).
2. PG&E will minimize adverse effects to the California red-legged frog, California tiger salamander, San Joaquin kit fox, longhorn fairy shrimp, vernal pool fairy shrimp and vernal pool tadpole shrimp.
3. The Corps shall ensure that PG&E is within compliance with the biological opinion for the project.

Conservation Measures

The specific conservation measures as described in the biological opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S) that will be part of the project are:

1. PG&E will implement all minimization measures described in the Service's January 26, 1999, *Programmatic Formal Endangered Species Act Consultation on the Issuance of Permits under Section 404 of the Clean Water Act or Authorization under the Nationwide Permit Program for Projects that May Affect the California Red-legged Frog (Rana aurora draytonii)* (Programmatic Consultation).
2. PG&E will submit the names and credentials of biologists proposed to perform preconstruction surveys and monitoring to the USFWS for written approval at least 15 days prior to commencement of any activities. A Service-approved biologist will survey the work sites two weeks before the onset of activities. If California red-legged frogs, tadpoles, or eggs or any life stage of California tiger salamander are found, the approved biologist will contact the Service to determine if moving any of these life-stages is appropriate. In making this determination the Service shall consider if an appropriate relocation site exists. If the Service approves moving animals, the approved biologist shall be allowed sufficient time to move California red-legged frogs and/or California tiger salamander from the sites before work activities begin. Only Service-approved biologists will participate in activities associated with the capture, handling, and monitoring of these species. If a California red-legged frog and/or California tiger salamander is found nearby, but outside a site, it will not be disturbed and the Service will be notified. The biologist will also report any observations of vernal pool fairy shrimp, long horn fairy shrimp, vernal pool tadpole shrimp, and San Joaquin kit fox.
3. Before any construction activities begin on the project, a Service-approved biologist will conduct a training session for all construction personnel. The training will include a description of the listed species with potential to occur, their habitat, and the general measures that are being implemented to conserve the species as they relate to the project and the boundaries within which the project may accomplished (i.e. sites).
4. A Service-approved biologist will be present on the work site until all minimization and avoidance measures have been completed. After this time, a biological monitor, who has been trained per *Conservation Measure 3*, will remain on site during all construction activities, and will have the authority to halt any work activity that might result in impacts that exceed the levels anticipated by the Corps, Service, and the CDFG during review of the proposed action. If work is stopped, the Corps, Service, and CDFG will be notified immediately by the Service-approved biologist or on-site monitor.

4 Ibid

5. During project activities, all trash that may attract predators will be properly contained, removed from the sites and disposed of regularly. Following construction, all trash and construction debris from sites will be removed.
6. All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 66 feet from any riparian habitat or water body. PG&E will ensure contamination of habitat does not occur during such operations. Prior to the start of construction, PG&E will prepare a plan to ensure a prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.
7. A Service-approved biologist will ensure that the spread or introduction of invasive plant species will be avoided to the maximum extent possible. When practical, invasive exotic plants in the project area will be removed.
8. Project areas that are disturbed will be revegetated with an appropriate assemblage of native seed mix, wetland and upland vegetation. PG&E will excavate soil from the area in layers and will stockpile each distinct layer in a separate pile. Layered soil will be replaced in the same order that they were removed.
9. The number of access routes, number and size of staging areas, and the total area of the activity will be limited to the minimum necessary to achieve the project goal. Routes and boundaries will be clearly demarcated, and these areas will be outside of riparian and wetland areas to the extent feasible. For the work in Site 3, were a seasonal wetland cannot be avoided, the 50 x 50 foot area will be delineated by fencing to limit impacts to adjacent wetland habitat. Where impacts occur in staging areas and access routes, restoration will be performed.
10. Work activities will be completed between April 1 and November 1. Should the proponent or applicant demonstrate a need to conduct activities outside this period, the Corps may authorize such activities after obtaining the Service's approval.
11. To control erosion during and after project implementation, PG&E will implement best management practices.
12. A Service-approved biologist will permanently remove, from within the project area, any individuals of exotic species, such as bullfrogs, crayfish, and centrarchid fishes to the maximum extent possible.
13. A preconstruction nesting bird survey will be conducted for burrowing owl and other special status birds. If active nest are found, buffers will be established to avoid impact to these species. If adequate buffers cannot be established, construction work will be delayed until after the breeding season is fully completed or CDFG will be contacted to determine further action.
14. A preconstruction survey of San Joaquin kit fox will be performed 14 to 30 days prior to the beginning of ground disturbance. Surveys will follow guidance described in the Service's 1999 "*Standardized Recommendations for Protection of the San Joaquin kit fox prior to or during ground disturbance*."
15. Project-related vehicles should observe a 20 mph speed limit in all project areas, except on county roads and State and Federal highways; this is particularly important at night when San Joaquin kit foxes are most active. To the extent possible, nighttime construction should be minimized. Off-road traffic outside of designated project areas should be prohibited.
16. To prevent inadvertent entrapment of San Joaquin kit foxes, California red-legged frogs or California Tiger salamanders during the construction phase of a project, all excavated, steep-walled holes or trenches more than 2 feet deep should be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they should be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, the Service and CDFG will be notified immediately.
17. San Joaquin kit foxes, California red-legged frogs, or California tiger salamanders are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of 4-inches or

greater that are stored at a construction site for one or more overnight periods should be thoroughly inspected for these species before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a San Joaquin kit fox is discovered inside a pipe, that section of pipe should not be moved until the Service has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.

18. To prevent harassment, mortality of San Joaquin kit foxes, California red-legged frog and/or California tiger salamander or destruction of dens by dogs or cats, no pets should be permitted on project sites.
19. Steel plates will be installed across the access route to Site 3 to reduce disturbance to the seasonal wetland.

Terms and Conditions

In order to be exempt from the prohibitions of section 9 of the Act, the Corps shall ensure that PG&E complies with the following terms and conditions, which implement the reasonable and prudent measures described above. These terms and conditions are nondiscretionary.

1. The following Terms and Conditions will implement Reasonable and Prudent Measure number one (1):
 - a. The PG&E shall make the terms and conditions in the biological opinion a required term in all contracts for the project that are issued by them to all contractors.
 - b. The PG&E shall provide the Resident Engineer or their designee with a copy of the biological opinion, and the Resident Engineer or their designee shall be responsible for implementing the conservation measures and Terms and Condition of the biological opinion and shall be the point of contact for the project. The Resident Engineer or their designee shall maintain a copy of the biological opinion on-site whenever construction is taking place. Their name and telephone number shall be provided to the Service at least thirty (30) calendar days prior to groundbreaking at the project. Prior to ground breaking, the Resident Engineer must submit a letter to the Service verifying that they possess a copy of the biological opinion and have read the Terms and Conditions.
 - c. The PG&E on-site monitor shall have oversight over implementation of all the Terms and Conditions of the biological opinion, and shall have the authority to stop project activities, through communication with the Resident Engineer, if any of the requirements associated with these Terms and Conditions are not being fulfilled. If biologist/construction liaison has requested a stop work due to take of any of the listed species, the Service and CDFG will be notified within one (1) working day via email or telephone.
2. The following Terms and Conditions will implement Reasonable and Prudent Measure number two (2):
 - a. Consistent with previous consultations on PG&E Gas Line projects, PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio. PG&E shall provide the Service with proof of compensation at least twenty (20) work days prior to ground breaking.
 - b. All excavated material shall be stored at a minimum of 150 feet from any culvert, wash, pond, vernal pool, or stream crossing.
 - c. Cross-country travel by vehicles shall be prohibited, unless authorized by the Service.
 - d. Plastic mono-filament netting (erosion control matting) or similar material containing netting shall not be used at the project site because California red-legged frog, California tiger salamanders, and the San Joaquin kit fox may become entangled or trapped in it. Acceptable substitutes include coconut coir matting or trackified hydroseeding compounds.

- e. All construction activity shall be confined within the Gas Line 303 ILI Repair Project site, which may include temporary access roads, haul roads, and staging areas specifically designated and marked for these purposes. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site without authorization from the Service.
 - f. The Gas Line 303 ILI Repair Project construction area shall be delineated with high visibility temporary fencing at least (4) feet in height, flagging, or other barrier to prevent encroachment of construction personnel and equipment onto any sensitive areas during project work activities. Such fencing shall be inspected and maintained daily until completion of the project. The fencing will be removed only when all construction equipment is removed from the site. Actions within the project area shall be limited to vehicle and equipment operation on existing roads. No project activities will occur outside the delineated project construction area.
 - g. Silt fencing will be used as needed in conjunction with the high visibility fencing to prevent soil and debris from entering sensitive areas. Such fencing shall be inspected and maintained daily until completion of the project. The fencing will be removed only when all construction equipment is removed from the site.
 - h. Twenty-four (24) hours prior to any ground disturbance, pre-construction surveys shall be conducted for San Joaquin kit foxes, California tiger salamanders, California red-legged frogs, vernal pool crustaceans, and sensitive plants. These surveys will consist of walking surveys of the project limits and adjacent areas accessible to the public to determine presence of the species.
 - i. The project area shall be re-inspected by the monitoring biologist whenever a lapse in construction activity of two weeks or greater has occurred.
 - j. Excavations shall be inspected in the morning before construction work starts to ensure that animals have not fallen in the trench or hole.
 - k. Only a Service approved biologist will be allowed to trap or capture California tiger salamanders and/or California red-legged frogs.
3. The following Terms and Conditions implement Reasonable and Prudent Measure three (3):
- a. If requested, during or upon completion of construction activities, the on-site biologist, and/or representative from PG&E shall accompany Service, CDFG, and/or Corps personnel on an onsite inspection of the site to review project effects on the San Joaquin kit fox, California red-legged frog, and California tiger salamander, vernal pool crustaceans, and their habitats.
 - b. The Corps shall ensure PG&E complies with the Reporting Requirements of this biological opinion.

Additionally CDFG has requested compensation for possible take for San Joaquin kit fox habitat and to meet CDFG full mitigation requirements for offsite compensation, a one to one compensation ratio or other ratio approved by CDFG and FWS is required.⁵

As required by the Biological Opinion, PG&E is required to comply with all the conservation measures, reasonable and prudent measures and terms and conditions of the Biological Opinion for the project to be deemed exempt and PG&E must implement all of the measures during all aspects of the proposed project.

PG&E has incorporated additional Avoidance and Protection Measures (APMs) into the Project description to minimize the Project's Greenhouse Gas air emissions. All PG&E standard practices are also considered avoidance measures and are considered part of the Project. To further reduce GHG emissions from Project construction (specifically CO₂); the following

⁵ Email message from Marcia Grefsrud, CDFG to Patricia Sanchez, PG&E dated November 17, 2009

measures will be implemented:

- 1: Encouraging the use of bio-diesel fuel for diesel-powered equipment and vehicles.
- 2: Encouraging construction workers to carpool.
- 3: Encouraging the recycling of construction waste.
- 4: Idling of construction vehicles will be kept to the minimum required to perform the work. Unnecessary engine idling is discouraged.

1.11 Mitigation Monitoring and Reporting Plan

The State Water Resources Control Board, as lead agency, is responsible for compliance, monitoring, and verification under CEQA. Compliance monitoring will be carried out by a monitor hired by the Applicant and subject to approval by the State Water Resources Control Board. Reports will be prepared by the compliance monitor(s) once field activities are completed at each site. These compliance reports will be sent to the State Water Resources Control Board.

In accordance with Section 15074(d) of the CEQA Guidelines, the Mitigation Monitoring and Reporting Program (MMRP) identifies the mitigation measures for PG&E's Line 303 In-Line Inspection Repair Project. The MMRP includes the reporting provisions that will be required to ensure proper implementation of these measures. The Mitigation Monitoring and Report Plan is included in Appendix F. The reporting requirements will be as follows:

- At the end of the project, PG&E will provide the State Water Resources Control Board with a final report on the project activities including the success of the mitigation measures implemented including the revegetation work. Before and after pictures will also be provided.
- At the end of the first winter after the project completion, PG&E will provide a report that will assess initial revegetation sprouting and the effectiveness of the erosion control measures.
- Near the end of the spring for the next four years following the completion of the Project, PG&E will perform a site assessment and submit a written report to the State Water Resources Board of its finding including the status of plants growing, the erosion control measures, whether there are any weeds on site, etc.
- In the event a problem and/or deficiency is identified during any of the above reporting periods, PG&E will consult with the State Water Resources Board on its plan of action to correct the deficiency. PG&E will also provide quarterly reports on the problem/deficiency until it is corrected and stabilized.

2.0 ENVIRONMENTAL SETTING AND DISCUSSION OF POTENTIAL IMPACTS

Existing Setting

Line 303 runs through very eastern unincorporated sections of Contra Costa and Alameda Counties. The proposed project consists of three specific sites – two are in eastern Contra Costa County south of Brentwood and west of Byron and one is in eastern Alameda County northeast of Livermore. Sites 1 and 2 are located within grazed annual grasslands. Site 3 is located in annual grasslands used for cattle grazing and utilities.

The Springtown Wetland Reserve located immediately south of Site 3 is known to support vernal pool fairy shrimp (CDFG 2008) and is designated critical habitat for vernal pool fairy shrimp (Unit VERFS 19C). Although this unit includes primarily lowland vernal pool habitat associated with the Springtown Wetland Reserve, a portion of the unit covers the 0.1 miles (650 feet) of access road to the anomaly at Site 3. This area would be traversed by vehicles and construction equipment including a tracked excavator. These vehicles and equipment would temporarily disturb the ground within this area; however, this area has been previously disturbed as recently as 2006 for a similar pipeline repair project.⁶

The project area is shown on the USGS 7.5 minute series topographic Brentwood quadrangle (7.5). The Assessor's Parcel number for Site 1 is 007-380-007-0 (State of California) and Site 2 is 07-160-016-7 (CC Water District) in Contra Costa County, and Site 3 is 099B-5300-006-04 (private owner) in Alameda County.

2.1 Aesthetics

2.1.1 Setting

The Project Area consists of three separate pipeline anomalies (Sites 1, 2, and 3). Sites 1 and 2 are located north and south of Camino Diablo Road, respectively, in Contra Costa County. Site 3 is located in Alameda County approximately two miles north of Interstate 580 and 0.45 miles west of Vasco Road near Livermore. Figure 1 shows the locations of the three sites. Access to sites 1 and 2 is via Camino Diablo Road, which is reached by driving south from Brentwood on Walnut Avenue to Camino Diablo and west on Camino Diablo to its intersection with the underground gas pipeline. Access to Site 3 is via a gated unpaved road located at the intersection of Ames Road and Raymond Road and is reached by taking the Vasco Road exit off Interstate 580 and heading north on Dalton Road, going west to Ames Road and take Ames Road north to its intersection with Raymond Road. The access road for Site 3 is underneath the Contra Costa-Los Positas 230 kV overhead electrical transmission line. Sites 1 and 2 are separated from Site 3 by a distance of approximately 9.8 miles.

Vasco Road is a heavily traveled commuter route connecting the Brentwood area with Interstate 580. Camino Diablo Road is a local county road serving the rural residential and agricultural uses in the area. Vasco Road is shown as a county-designated Scenic Expressway on the Contra Costa General Plan 2005-2010, Transportation Element and Camino Diablo Road is a county designated scenic corridor. South Vasco Road, which is south of Hwy 580, is also designated as a scenic route in the Alameda County Route Element as amended in 1994 of the Alameda County General Plan.

⁶ Biological Assessment for Pacific Gas and Electric Company's Line 303 In-Line Inspection Project dated May 2009 and prepared by Garcia and Associates

2.1.2 Environmental Impacts

The proposed project will have a significant adverse effect on visual quality if it will:

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Substantially degrade the existing visual character or quality of the site and its surroundings.
- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

The following is a discussion of the potential effects of the proposed project for each of these significance criteria.

Have a substantial adverse effect on a scenic vista. No Impact. Sites 1 and 2 are located adjacent to Camino Diablo and Vasco Roads, which are scenic routes as designated in the Contra Costa County 2005-2020 General Plan. The project will result in the temporary loss of annual grassland surface vegetation over a very small area which is not visible from a public road; therefore no changes in the existing views would occur as a result of the project. No aesthetic impacts to the scenic vistas will occur.

Substantially damage scenic resources. No Impact. The proposed project will result in temporary loss of annual grassland surface vegetation over a very small area which will not damage scenic resources.

Degrade the existing visual character. No Impact. The proposed project will result in temporary loss of annual grassland surface vegetation over a very small area which is not visible from a public road.

Create light or glare. No impact. No lighting is required for the project; therefore the proposed project will not produce any light or glare.

2.1.3 Mitigation Measures

Implementation of the proposed project will not result in any significant adverse effect on aesthetic and visual resources in the project area; therefore no mitigation measures are necessary.

2.2 Agricultural Resources

2.2.1 Setting

Sites 1 and 2 are located on lands designated by Contra Costa County as Important Agricultural Lands, with grazing as the primary agricultural use. Site 3 is located on lands designated as Other Land on the Prime Agricultural Land in the Alameda County General Plan Conservation Element (1994). The land is currently and has historically been used for livestock grazing. Grazing in the immediate area of the project sites will be temporarily precluded during the excavation and replacement activities to avoid impacts to grazing cattle.

The Williamson Act contract status of the farmlands along the existing power line has not been determined, but the proposed project will not affect the status of any contracts since the agricultural use will not change.

2.2.2 Environmental Impacts

The proposed project will have a significant adverse effect on agricultural resources if it will:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping & Monitoring Program of the California Resources Agency, to non-agricultural uses?
- Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in the Public Resources Code section 12220 (g) or timberland (as defined by Public Resources Code section 4526)?
- Result in the loss of forest land or conversion of forest land to non-forest use?
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest lands to non-forest use?

Convert Special Status Farmland. No impact. Grazing will continue as the land use once the project is completed; the project will not result in a change in land use.

Conflict with zoning for agricultural use or Williamson Act. No impact. The project will not result in a change in zoning. Since the proposed project will not affect the long-term agricultural use of the affected properties, the status of any properties currently under Williamson Act contract will not be affected.

Conflict with existing zoning or cause rezoning of forest land. No Impact. There are no forest lands within 1000 feet of the project. No zoning changes are proposed.

Result in the loss of forest land. No Impact. There are no forest lands within 1000 feet of the project.

Result in conversion of farmland to non-agricultural use. No impact. The project will not result in the conversion of any agricultural or farmlands to any other use. No land use changes are proposed.

2.2.3 Mitigation Measures

Implementation of the proposed project will not result in any significant adverse effects on agricultural resources in the project area; therefore no mitigation measures are necessary.

2.3 Air Quality

2.3.1 Setting

The proposed project is located in the Bay Area Air Quality Management District (BAAQMD). The district is presently not in attainment for California standards for Ozone (1-hour) and PM10, but is in attainment for the other pollutants. The air quality in the vicinity of the project is likely better than the reported air quality for the BAAQMD since it is not near concentrated urban development or major transportation corridors.

Potential emissions from the proposed project will be limited to construction vehicle emissions and dust from vehicle traffic and excavation.

2.3.2 Environmental Impacts

The proposed project will have a significant adverse effect on air quality if it will:

- Conflict with or obstruct implementation of the applicable air quality plan?
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Expose sensitive receptors to substantial pollutant concentrations?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality

standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

- Create objectionable odors affecting a substantial number of people?

Conflict with an air quality plan. No impact. The only emissions associated with the proposed project will be the temporary exhaust emissions and fugitive dust from construction equipment, which would be minimal and would not violate any existing air quality standards, plans nor result in a measurable net increase in any pollutant for the project region. There will be no combustion emissions associated with the operation of the proposed project. Construction vehicle traffic will be minimal, but Best Management Practices will be implemented to minimize the generation of fugitive dust if needed. Therefore, the project will not conflict with or obstruct implementation of applicable air quality plan.

Violate an air quality standard. No impact. The proposed project will not result in new stationary sources of emissions, so no standards will be violated.

Expose sensitive receptors. No impact. The proposed project is not near any sensitive receptors.

Result in cumulative increases in pollutants. No impact. The excavation and repair of the pipeline are of short duration and there will be no operations emissions. Consequently, the project will not result in a cumulative increase of pollutants.

Create objectionable odors. No impact. The proposed project will not create odors.

2.3.3 Mitigation Measures

Implementation of the proposed project will not result in any significant adverse effects on air quality in the project area; therefore no mitigation measures are necessary.

2.4 Biological Resources

2.4.1 Setting

PG&E retained the services of Garcia and Associates (GANDA) to conduct site surveys and prepare a Biological Assessment (BA) to characterize the potential effects of the proposed activities on sensitive biological resources. A copy of the BA is included as Appendix A and herein incorporated by reference. The BA includes a discussion of the methodology used in determining the existing biological setting and potential project impacts. The biological assessment of the project area was performed in May 2009. GANDA also prepared a Wetlands and Waters of the United States Delineation Report in May 2009, a copy of which is included as Appendix B and herein incorporated by reference. Three wetlands features were identified as present in the Line 303 in line inspection project area and they are discussed in more detailed below.

In November 2009 the Service issued its biological opinion for the proposed Gas Line 303 In Line Inspection (ILI) Repair Project and determined that the Project is not likely to jeopardize the continued existence of the California red-legged frog, California tiger salamander, San Joaquin kit fox, long horn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp current status. Although designated critical habitat for vernal pool fairy shrimp and proposed critical habitat for the California red-legged frog will be affected, none will be destroyed or adversely modified by the project.⁷ The Biological Opinion issued by the USFWS is included in Appendix D and herein incorporated by reference.

Federal and California State listed species

The GANDA report determined that there are seven species have potential to occur within the

Project Area including four invertebrates two amphibians and one mammal: California red-legged frog (CRLF), California tiger salamander (CTS), San Joaquin kit fox, Conservancy fairy shrimp, vernal pool tadpole shrimp, and vernal pool fairy shrimp (VPFS). Each of these species is discussed in detail below.⁷

Table 1

Federal and California State listed species with potential to occur within the Line 303 In-Line Inspection Project Area

Species	Federal/State/CNP S Status	Habitat	Potential to Occur
Plants			
Palmate-bracted bird's beak <i>Cordylanius palmatus</i>	FE/CE/1B.1	Lowland plains and basins at elevations of less than 500 feet. Grows primarily along the edges of channels and drainages, with a few individuals scattered in seasonally wet depressions, alkali scalds (barren areas with a surface crust of salts) and grassy areas.	Low. Large population present in Springtown Wetland Reserve located immediately south of Site 3.
Contra Costa goldfields <i>Lasthenia conjugens</i>	FE/-/1B	Valley and foothill grasslands, vernal pools, cismontane woodland	None. No known record of species within four miles of Project Area.
Invertebrates			
Vernal pool fairy shrimp <i>Branchinecta lynchi</i>	FT/-/-	Small to large vernal pools	Moderate. Vernal pool near Site 1 and critical habitat within one mile of Site 1.
Long horn fairy shrimp <i>Branchinecta longiantenna</i>	FE/-/-	Vernal pools and swales in valley grassland	Moderate. Vernal pool near Site 1).
Conservancy fairy shrimp <i>Branchinecta conservatio</i>	FE/-/-	Vernal pools and swales in valley grassland	Moderate. Vernal pool near Site 1).
Vernal pool tadpole shrimp <i>Lepidurus packardii</i>	FE/-/-	Vernal pools and swales in valley grassland	Moderate. Vernal pool near Site 1).
Valley elderberry longhorn beetle <i>Desmocerus californicus dimorphus</i>	FT/-/-	Restricted to elderberry (<i>Sambucus</i> sp.) shrubs for larval development from Shasta County to Fresno County.	None. Lack of suitable habitat in Project Area.
Amphibians			

⁷ Biological Assessment for Pacific Gas and Electric Company's Line 303 In-Line Inspection Project dated May 2009 and prepared by Garcia and Associates

Species	Federal/State/CNP S Status	Habitat	Potential to Occur
California red-legged frog <i>Rana draytonii</i>	FT/CSC/-	Ponds, pools, and slow-moving streams.	High. Breeding habitat within 80 m of Site 3: one record within a mile of Sites 1 and 2. Designated critical habitat 3.4 miles west of Site 3.
California tiger salamander <i>Ambystoma californiense</i>	FT/CDC/-	Ponds, pools, and slow-moving streams.	High. Breeding habitat within 80 m of Site 3: one record within a mile of Sites 1 and 2. Designated critical habitat 3.4 miles west of Site 3.
Reptiles			
Alameda whipsnake <i>Masticophis lateralis euryxanthus</i>	FT/CT/-	Chaparral, northern coastal sage scrub, coastal sage, and grassland communities	Low. Project area lacks Chaparral or shrub habitat required for species. Critical habitat is located 6.9 miles northwest of Site 3.
Giant garter snake <i>Thamnophis gigas</i>	FT/CT/-	Natural and artificial wetlands including sloughs, agricultural ditches, canals, rice fields and freshwater marshes.	None. No suitable habitat in Project Area.
Birds			
California least tern <i>Sterna antillarum browni</i>	FE/CE/-	Nests on barren to sparsely vegetated areas near water	None. No suitable habitat in Project Area.
Mammals			

Species	Federal/State/CNP S Status	Habitat	Potential to Occur
San Joaquin kit fox <i>Vulpes macrotis mutica</i>	FE/CT/-	Grasslands, scrublands, irrigated pastures, orchards, vineyards, and grazed annual grasslands habitat	Low. Nearest CNDDDB record is 0.5 miles west of Site 1. May forage in area but there are no suitable burrows for dens at any of the work areas.

Status codes are defined as follows:

Federal status: USFWS Listing

- FE Listed as endangered under the Federal Endangered Species Act.
- FT Listed as threatened under the Federal Endangered Species Act.

California State Status: CDFG Listing

- CE Listed as endangered under the California Endangered Species Act.
- CT Listed as threatened under the California Endangered Species Act.

California Native Plant Society (CNPS) status:

- 1B.1 – Plant species that are seriously endangered in California

For more detailed information refer to the BA attached as Appendix A

The proposed access road to Site 3 is located within designated critical habitat (Unit 19C) for vernal pool fairy shrimp; access to the Project Area will require a limited amount of vehicle and a tracked excavator to drive across 0.18 acres (7,920 sq. ft.) of this critical habitat, which does not contain vernal pool habitat. All three anomalies are not located within critical habitat. Sites 1 and 2 lie within proposed CRLF critical habitat (Unit CCS-2) and Site 3 lies within proposed CRLF critical habitat Unit ALA-2 (USFWS 2008)⁸.

The biological assessment also indicated that the entire project will result in approximately 0.077 acres of temporary impact to potential CRLF estivation habitat and 0.451 acres of potential dispersal habitat. In addition, approximately 0.218 acres of potential California tiger salamander estivation habitat and 0.31 acres of potential dispersal habitat would be temporarily impacted by project related activities.

Botanical Resources

The biological assessment report also reviewed the potential for the existence of Palmate bracted bird's beak to occur near Site 3 due to its close proximity to Springtown. Springtown is the only place left in the Livermore Valley that is host to the listed Palmate bracted bird's beak. The plant, which is 10 to 30 centimeters tall, was not observed during several site visits including a visit during the blooming period for this annual plant. The plant was also not observed during previous surveys conducted in 2005 and 2006 by Jones and Stokes. The plant's microhabitat is more associated with alkali 'sink' than with the swale area that is near the Site 3 anomaly. The salinity level and duration of flooding appear to be key elements for Palmate bracted bird's beak habitat and the swale at Site 3 is probably less saline and less flooded compared to the basin area where bird's beak is known to occur⁹.

⁸ Biological Assessment for Pacific Gas and Electric Company's Line 303 In-Line Inspection Project dated May 2009 and prepared by Garcia and Associates

⁹ Garcia and Associates email dated August 17, 2009

Wetlands Delineation

PG&E also had a wetland delineation report prepared in May 2009, which determined that there are three wetlands features present in the Line 303 in line inspection project area. At Site 1, a seasonal wetland and a vernal pool feature are present. The Site 1 seasonal wetland depression that is over the pipeline anomaly is 8 feet long and 4 feet wide or 32 square feet or 0.000735 acres, which will be impacted during the inline inspections and repair work. The Site 1 'vernal pool' feature is located approximately 15 feet east of the pipeline anomaly and is 100 feet long by 50 feet wide or 5000 square feet or 0.114784 acres. This area will be avoided and will not be impacted by the in line inspection and repair work. At Site 3, an alkali swale located on the access road is 100 feet long by 12 feet wide or 1200 square feet or 0.27548 acres. This area will be protected by steel plates that will be removed following the completion of the in line inspection and repair work. Each of these features is considered a potential jurisdictional wetland subject to jurisdiction as verified the Army Corps.¹⁰

2.4.2 Environmental Impacts

The proposed project will have a significant adverse effect on biological resources if it will:

- Have a substantial adverse effect, either directly or indirectly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS?
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFG or USFWS?
- Have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, *etc.*) through direct removal, filling, hydrological interruption or other means?
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The following is a discussion of the potential effects of the proposed project for each of these significance criteria.

United States Fish and Wildlife Service No-Jeopardy Biological Opinion

As previously mentioned, the Service has determined in its biological opinion that the Project is not likely to jeopardize the continued existence of the California red-legged frog, California tiger salamander, San Joaquin kit fox, long horn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp current status. Although designated critical habitat for vernal pool fairy shrimp and proposed critical habitat for the California red-legged frog will be affected, none will be destroyed or

¹⁰ Delineation of Wetlands and Waters of the US for PG&E's Line 303 In-Line Inspection Project dated May 2009 and prepared by Garcia and Associates and email message date July 31, 2009 and the August 26, 2009 Letter from the Army Corps of Engineers, File No. 2009-00143S verifying the wetlands delineation.

adversely modified by the project¹¹.

Additionally, pursuant to Section 9, the Service has identified conservation measures which must be implemented by the Corps and become binding conditions of the permit issued to PG&E in order for the exemption in Section 7(o)(2) to apply. The Service estimates that:

- all of the San Joaquin kit foxes inhabiting or utilizing areas with 0.5 acre will be subject to incidental take in the form of harm and harassment,
- all California tiger salamanders inhabiting 0.5 acres, will be subject to incidental take in the form of harm, harassment, capture, injury and death;
- all California red-legged frogs inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death; and
- all longhorn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp inhabiting 0.03 acre of seasonal wetlands will be subject to incidental take.

The Service has determined that upon the implementation of the Reasonable and Prudent Measures included in the Biological Opinion issued for the project, that incidental takes associated with the Gas Line 303I for each of the above species will become exempt from the prohibitions described under Section 9 of the Endangered Species Act (Act).

Special Status Wildlife

Seven federal and/or state listed threatened or endangered species are either known to occur or presence has been assumed in the project area. These species or their habitats are potentially subject to project-related impacts. The Service has determined in its biological opinion that the proposed Gas Line 303 ILI Repair Project is not likely to jeopardize the continued existence of the California red-legged frog, California tiger salamander, San Joaquin kit fox, long horn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp current status. Although designated critical habitat for vernal pool fairy shrimp and proposed critical habitat for the California red-legged frog will be affected, none will be destroyed or adversely modified by the project¹². The following discusses the specific impacts anticipated for each species.

- **California Red-legged Frog:** Less than significant with mitigation incorporated. Sites 1 and 2 lie within proposed CRLF critical habitat (Unit CCS-2) and Site 3 lies within proposed CRLF critical habitat Unit ALA-2 (USFWS 2008)¹³. The biological assessment report also indicated that the entire project will result in approximately 0.077 acres of temporary impacts to potential CRLF estivation habitat and to 0.451 acres of potential dispersal habitat. The USFWS issue the Biological Opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009, which determined that the project would be exempt from the prohibitions of section 9 of the Act, if the Corps ensures that PG&E complies with the terms and conditions of the Biological Opinion, which implements reasonable and prudent measure detailed in the Opinion including the provisions of the *January 26, 1999, Programmatic Formal Endangered Species Act Consultation on the Issuance of Permits under Section 404 of the Clean Water Act or Authorization under the Nationwide Permit Program for Projects that May Affect the California Red-legged Frog (Rana aurora draytonii)* (Programmatic Consultation). The USFWS has estimated that all California red-legged frogs inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death as a result of

11 USFWS Biological Opinion for the PG&E Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009

12 USFWS Biological Opinion for the PG&E Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009

13 Biological Assessment for Pacific Gas and Electric Company's Line 303 In-Line Inspection Project dated May 2009 and prepared by Garcia and Associates

the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio. Compliance with all these provisions and the mitigations measures on pages 10-15 of this document would reduce the impacts to less than significant.

- **Vernal Pool Fairy Shrimp, Long horn Fairy Shrimp and Vernal Pool Tadpole Species.** Less than significant with mitigation incorporated. The proposed access road to Site 3 is located within designated critical habitat (Unit 19C) for vernal pool fairy shrimp; access to the Project Area will require a limited amount of vehicle and a tracked excavator to drive across 0.18 acres (7,920 sq. ft.) of this critical habitat, which does not contain vernal pool habitat. Per the Biological Opinion issued for the project, the USFWS has estimated that all longhorn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp inhabiting 0.3 acre of seasonal wetlands will be subject to incidental take as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio. Compliance with all these provisions and the mitigations measures on pages 10-15 of this document would reduce the impacts to less than significant.
- **California Tiger Salamander.** Less than significant with mitigation incorporated. The biological assessment prepared by GANDA determined that approximately 0.218 acres of potential California tiger salamander estivation habitat and 0.31 acres of potential dispersal habitat would be temporarily impacted by project related activities. Per the Biological Opinion issued for the project, the USFWS has determined that the project will result in California Tiger Salamander USFW has determined that impacts to all California tiger salamanders inhabiting 0.5 acres, will be subject to incidental take in the form of harm, harassment, capture, injury and death. The USFWS has estimated that all California Tiger Salamander inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio. Compliance with all these provisions and the mitigations measures on pages 10-15 of this document would reduce the impacts to less than significant.
- **San Joaquin Kit Fox.** Less than significant with mitigation incorporated. The nearest CNDDDB record is 0.5 miles west of Site 1. Due to the mobile nature of kit fox and their ability to travel relatively long distances, they are assumed to travel through the project sites. Per the Biological Opinion issued for the project, the USFW has determined that impacts to all of the San Joaquin kit foxes inhabiting or utilizing areas with 0.5 acre will be subject to incidental take in the form of harm and harassment. CDFG concurs with the Services determination regarding the San Joaquin kit foxes impacts. PG&E will compensate for effects to listed San Joaquin kit foxes, with a minimum three to one compensation ratio as requested by CDFG. Compliance with all these provisions and the mitigations measures on pages 10-15 of this document would reduce the impacts to less than significant.

Riparian habitat or other sensitive natural community. No impact. There is no riparian habitat or other sensitive natural community within the Project Area.

Wetlands. Less than significant with mitigation incorporated. A wetlands delineation was conducted of the two sites by GANDA. Site 2 includes habitat that meets two of the three criteria and may be classified as seasonal wetland. Site 3 includes all three criteria and is considered a potential jurisdictional wetland and confirmed by the Corps of Engineers. Routes and boundaries will be clearly demarcated, and these areas will be outside of riparian and wetland

areas to the extent feasible. For the work in Site 3, where a seasonal wetland cannot be avoided, the 50 x 50 foot area will be delineated by fencing to limit impacts to adjacent wetland habitat. Where impacts occur in staging areas and access routes, restoration will be performed. Steel plates will be installed across the access route to Site 3 to reduce disturbance to the seasonal wetland. However, the proposed site restoration following the temporary surface disturbance associated with the project will ensure the project will not result in any net loss of wetland habitat and that wetland functions and values will be restored within one season. Compliance with all these provisions and the mitigations measures on pages 10-15 of this document would reduce the impacts to less than significant.

Fish and Wildlife Movement: Less than significant with mitigation incorporated. Kit fox may forage in the project area but the short term loss of this very small amount of foraging habitat is not considered significant. Measures to protect San Joaquin kit fox movements are discussed above. Compliance with all these provisions and the mitigations measures on pages 10-15 of this document would reduce the impacts to less than significant.

Local Biological Resource Protection Ordinances. No impact. There are no local biological ordinances that will be affected by the proposed project.

Habitat Conservation Plan. No impact. The East Contra Costa County Habitat Conservation Plan Association (ECCCHCP) has developed a Habitat Conservation Plan / Natural Community Conservation Planning (HCP/NCCP) that provides regional conservation and development guidelines to protect natural resources within eastern Contra Costa County. Sites 1 and 2 are on the peripheries of the conservation plan area and would not conflict with the plan provisions. The temporary project impacts will not have an adverse affect any conservation areas or plans.

2.4.3 Mitigation Measures

Implementation of the following measures will reduce the potential effects of the project on cultural resources to ***less-than-significant***.

The Service has determined that the following reasonable and prudent measures are necessary and appropriate to minimize the effects of the Gas Line 303 ILI Repair project on California red-legged frog, California tiger salamander, San Joaquin kit fox, longhorn fairy shrimp, vernal pool fairy shrimp and vernal pool tadpole shrimp.¹⁴

1. PG&E will implement the conservation measures as described in the biological opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S).
2. PG&E will minimize adverse effects to the California red-legged frog, California tiger salamander, San Joaquin kit fox, longhorn fairy shrimp, vernal pool fairy shrimp and vernal pool tadpole shrimp.
3. The Corps shall ensure that PG&E is within compliance with the biological opinion for the project.

Conservation Measures

The specific conservation measures as described in the biological opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S) that will be part of the project are:

1. PG&E will implement all minimization measures described in the Service's January 26, 1999, *Programmatic Formal Endangered Species Act Consultation on the Issuance of Permits under Section 404 of the Clean Water Act or Authorization under the Nationwide*

14 Ibid

Permit Program for Projects that May Affect the California Red-legged Frog (Rana aurora draytonii) (Programmatic Consultation).

2. PG&E will submit the names and credentials of biologists proposed to perform preconstruction surveys and monitoring to the USFWS for written approval at least 15 days prior to commencement of any activities. A Service-approved biologist will survey the work sites two weeks before the onset of activities. If California red-legged frogs, tadpoles, or eggs or any life stage of California tiger salamander are found, the approved biologist will contact the Service to determine if moving any of these life-stages is appropriate. In making this determination the Service shall consider if an appropriate relocation site exists. If the Service approves moving animals, the approved biologist shall be allowed sufficient time to move California red-legged frogs and/or California tiger salamander from the sites before work activities begin. Only Service-approved biologists will participate in activities associated with the capture, handling, and monitoring of these species. If a California red-legged frog and/or California tiger salamander is found nearby, but outside a site, it will not be disturbed and the Service will be notified. The biologist will also report any observations of vernal pool fairy shrimp, long horn fairy shrimp, vernal pool tadpole shrimp, and San Joaquin kit fox.
3. Before any construction activities begin on the project, a Service-approved biologist will conduct a training session for all construction personnel. The training will include a description of the listed species with potential to occur, their habitat, and the general measures that are being implemented to conserve the species as they relate to the project and the boundaries within which the project may be accomplished (i.e. sites).
4. A Service-approved biologist will be present on the work site until all minimization and avoidance measures have been completed. After this time, a biological monitor, who has been trained per *Conservation Measure 3*, will remain on site during all construction activities, and will have the authority to halt any work activity that might result in impacts that exceed the levels anticipated by the Corps, Service, and the CDFG during review of the proposed action. If work is stopped, the Corps, Service, and CDFG will be notified immediately by the Service-approved biologist or on-site monitor.
5. During project activities, all trash that may attract predators will be properly contained, removed from the sites and disposed of regularly. Following construction, all trash and construction debris from sites will be removed.
6. All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 66 feet from any riparian habitat or water body. PG&E will ensure contamination of habitat does not occur during such operations. Prior to the start of construction, PG&E will prepare a plan to ensure a prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.
7. A Service-approved biologist will ensure that the spread or introduction of invasive plant species will be avoided to the maximum extent possible. When practical, invasive exotic plants in the project area will be removed.
8. Project areas that are disturbed will be revegetated with an appropriate assemblage of native seed mix, wetland and upland vegetation. PG&E will excavate soil from the area in layers and will stockpile each distinct layer in a separate pile. Layered soil will be replaced in the same order that they were removed.
9. The number of access routes, number and size of staging areas, and the total area of the activity will be limited to the minimum necessary to achieve the project goal. Routes and boundaries will be clearly demarcated, and these areas will be outside of riparian and wetland areas to the extent feasible. For the work in Site 3, were a seasonal wetland cannot be avoided, the 50 x 50 foot area will be delineated by fencing to limit impacts to adjacent wetland habitat. Where impacts occur in staging areas and access routes, restoration will be performed.

10. Work activities will be completed between April 1 and November 1. Should the proponent or applicant demonstrate a need to conduct activities outside this period, the Corps may authorize such activities after obtaining the Service's approval.
11. To control erosion during and after project implementation, PG&E will implement best management practices.
12. A Service-approved biologist will permanently remove, from within the project area, any individuals of exotic species, such as bullfrogs, crayfish, and centrarchid fishes to the maximum extent possible.
13. A preconstruction nesting bird survey will be conducted for burrowing owl and other special status birds. If active nest are found, buffers will be established to avoid impact to these species. If adequate buffers cannot be established, construction work will be delayed until after the breeding season is fully completed or CDFG will be contacted to determine further action.
14. A preconstruction survey of San Joaquin kit fox will be performed 14 to 30 days prior to the beginning of ground disturbance. Surveys will follow guidance described in the Service's 1999 "*Standardized Recommendations for Protection of the San Joaquin kit fox prior to or during ground disturbance*."
15. Project-related vehicles should observe a 20 mph speed limit in all project areas, except on county roads and State and Federal highways; this is particularly important at night when San Joaquin kit foxes are most active. To the extent possible, nighttime construction should be minimized. Off-road traffic outside of designated project areas should be prohibited.
16. To prevent inadvertent entrapment of San Joaquin kit foxes, California red-legged frogs or California Tiger salamanders during the construction phase of a project, all excavated, steep-walled holes or trenches more than 2 feet deep should be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they should be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, the Service and CDFG will be notified immediately.
17. San Joaquin kit foxes, California red-legged frogs, or California tiger salamanders are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of 4-inches or greater that are stored at a construction site for one or more overnight periods should be thoroughly inspected for these species before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a San Joaquin kit fox is discovered inside a pipe, that section of pipe should not be moved until the Service has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.
18. To prevent harassment, mortality of San Joaquin kit foxes, California red-legged frog and/or California tiger salamander or destruction of dens by dogs or cats, no pets should be permitted on project sites.
19. Steel plates will be installed across the access route to Site 3 to reduce disturbance to the seasonal wetland.

Terms and Conditions

In order to be exempt from the prohibitions of section 9 of the Act, the Corps shall ensure that PG&E complies with the following terms and conditions, which implement the reasonable and prudent measures described above. These terms and conditions are nondiscretionary.

1. The following Terms and Conditions will implement Reasonable and Prudent Measure number one (1):
 - a. The PG&E shall make the terms and conditions in the biological opinion a required term in all contracts for the project that are issued by them to all contractors.
 - b. The PG&E shall provide the Resident Engineer or their designee with a copy of the biological opinion, and the Resident Engineer or their designee shall be

- responsible for implementing the conservation measures and Terms and Condition of the biological opinion and shall be the point of contact for the project. The Resident Engineer or their designee shall maintain a copy of the biological opinion on-site whenever construction is taking place. Their name and telephone number shall be provided to the Service at least thirty (30) calendar days prior to groundbreaking at the project. Prior to ground breaking, the Resident Engineer must submit a letter to the Service verifying that they possess a copy of the biological opinion and have read the Terms and Conditions.
- c. The PG&E on-site monitor shall have oversight over implementation of all the Terms and Conditions of the biological opinion, and shall have the authority to stop project activities, through communication with the Resident Engineer, if any of the requirements associated with these Terms and Conditions are not being fulfilled. If biologist/construction liaison has requested a stop work due to take of any of the listed species, the Service and CDFG will be notified within one (1) working day via email or telephone.
2. The following Terms and Conditions will implement Reasonable and Prudent Measure number two (2):
- a. Consistent with previous consultations on PG&E Gas Line projects, PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio. PG&E shall provide the Service with proof of compensation at least twenty (20) work days prior to ground breaking.
 - b. All excavated material shall be stored at a minimum of 150 feet from any culvert, wash, pond, vernal pool, or stream crossing.
 - c. Cross-country travel by vehicles shall be prohibited, unless authorized by the Service.
 - d. Plastic mono-filament netting (erosion control matting) or similar material containing netting shall not be used at the project site because California red-legged frog, California tiger salamanders, and the San Joaquin kit fox may become entangled or trapped in it. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds.
 - e. All construction activity shall be confined within the Gas Line 303 ILI Repair Project site, which may include temporary access roads, haul roads, and staging areas specifically designated and marked for these purposes. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site without authorization from the Service.
 - f. The Gas Line 303 ILI Repair Project construction area shall be delineated with high visibility temporary fencing at least (4) feet in height, flagging, or other barrier to prevent encroachment of construction personnel and equipment onto any sensitive areas during project work activities. Such fencing shall be inspected and maintained daily until completion of the project. The fencing will be removed only when all construction equipment is removed from the site. Actions within the project area shall be limited to vehicle and equipment operation on existing roads. No project activities will occur outside the delineated project construction area.
 - g. Silt fencing will be used as needed in conjunction with the high visibility fencing to prevent soil and debris from entering sensitive areas. Such fencing shall be inspected and maintained daily until completion of the project. The fencing will be removed only when all construction equipment is removed from the site.
 - h. Twenty-four (24) hours prior to any ground disturbance, pre-construction surveys shall be conducted for San Joaquin kit foxes, California tiger salamanders, California red-legged frogs, vernal pool crustaceans, and sensitive plants. These surveys will consist of walking surveys of the project limits and adjacent areas accessible to the public to determine presence of the species.
 - i. The project area shall be re-inspected by the monitoring biologist whenever a

- lapse in construction activity of two weeks or greater has occurred.
- j. Excavations shall be inspected in the morning before construction work starts to ensure that animals have not fallen in the trench or hole.
 - k. Only a Service approved biologist will be allowed to trap or capture California tiger salamanders and/or California red-legged frogs.
3. The following Terms and Conditions implement Reasonable and Prudent Measure three (3):
- a. If requested, during or upon completion of construction activities, the on-site biologist, and/or representative from PG&E shall accompany Service, CDFG, and/or Corps personnel on an onsite inspection of the site to review project effects on the San Joaquin kit fox, California red-legged frog, and California tiger salamander, vernal pool crustaceans, and their habitats.
 - b. The Corps shall ensure PG&E complies with the Reporting Requirements of this biological opinion.

Additionally CDFG has requested compensation for possible take for San Joaquin kit fox habitat and to meet CDFG full mitigation requirements for offsite compensation, a one to one compensation ratio or other ratio approved by CDFG and FWS is required.¹⁵

As required by the Biological Opinion, PG&E is required to comply with all the conservation measures, reasonable and prudent measures and terms and conditions of the Biological Opinion for the project to be deemed exempt and PG&E must implement all of the measures during all aspects of the proposed project. In terms of CEQA, compliance with all the provision detailed in the Biological Opinion will mitigate the project impacts to less than significant.

2.5 Cultural Resources

2.5.1 Setting

PG&E commissioned a cultural resource investigation by Garcia and Associates (GANDA) for the three sites. A copy of the Cultural Resources Inventory Report is included as Appendix C and herein incorporated by reference. GANDA archaeologists conducted a records search and historic map research at the Northwest Information center (NWIC) of the California Historic Resource Inventory System (CHRIS) at Sonoma State University; consulted with the Native American Heritage Commission (NAHC) and interested Native American groups and individuals; and performed archeological testing of one cultural resource identified adjacent to the Area of Potential Effects (APE) near Sites 1 and 2. The archeological testing determined that there are not eligible or potentially eligible historic properties within in the APE and no further archeological work is necessary prior to construction.¹⁶

2.5.2 Environmental Impacts

The proposed project will have a significant adverse effect on cultural resources if it will:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
- Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

15 Email message from Marcia Grefsrud, CDFG to Patricia Sanchez, PG&E dated November 17, 2009

16 Archeological Testing Results for the Line 303 ILI Repair Project, dated July 2009 and prepared by Garcia and Associates and Cultural Inventory Report Prepared for Line 303 ILI Inspection in March 2009

- Disturb any human remains, including those interred outside of formal cemeteries?

The following is a discussion of the potential effects of the proposed project for each of these significance criteria.

Adverse change in historical and archaeological resources. Less than significant with mitigation incorporated. Excavation as proposed at each site could affect unknown subsurface resources. See Mitigation Measure 1 below.

Destroy a unique paleontological resource: Less than significant with mitigation incorporated. Excavation as proposed at each site could affect unknown subsurface resources. See Mitigation Measure 2 below.

Disturb human remains: Less than significant with mitigation incorporated. Excavation as proposed at each site could affect unknown human remains. See Mitigation Measure 1 below.

2.5.3 Mitigation Measures

Implementation of the following measures will reduce the potential effects of the project on cultural resources to *less-than-significant*.

Mitigation Measure 1: Resources inadvertently discovered

Should previously unidentified archeological resource (e.g., metal, glass, ceramic refuse, privies, wells, etc.) or human remains be encountered during construction, work within the immediate vicinity of the find will stop until such time that a qualified archaeologist can evaluate the find and make appropriate recommendations for mitigation, if warranted. If the find includes bones or any other human remains, the County Coroner will immediately be notified. At the same time a qualified archaeologist should be contacted to evaluate the discovery. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 48 hours of this identification.

Mitigation Measure 2: Paleontological resources

In the event that previously unidentified fossil remains are encountered during project construction, a qualified paleontological specialist will be contacted. Construction within the immediate vicinity of the find will be temporarily halted or diverted until a qualified vertebrate paleontologist examines the discovery. If the find is potentially significant, the paleontologist will contact the appropriate agencies or educational institutions to determine procedures that should be followed before construction is allowed to resume at the location of the find, and procedures for salvage and disposition of the fossils.

2.6 Geology and Soils

2.6.1 Setting

Sites 1 and 2 are located in an area generally characterized by Tertiary formations of hard marine sandstone and shale overlain by soft non-marine (Pliocene) units. Slope stability condition range from good to poor. Sites 1 and 2 are located near a strike-slip area of seismic disturbance. Between 1934 and 1971, there was an earthquake of 3.5 to 4.5 magnitude in close proximity to the site. However, because the area where sites 1 and 2 are located is classified as hard bedrock, they are expected to perform satisfactorily under earthquake conditions, provided that ground materials near the surface do not fail.¹⁷ Sites 1 and 2 lie within an Alquist-Priolo Special Studies Zone for active faulting. Site 3 is not with an active fault zone.

2.6.2 Environmental Impacts

The proposed project will have a significant adverse effect on geology, earth and soils if it will:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault referenced in the Division of Mines & Geology Special Publication 42?
 - Strong seismic ground shaking?
 - Seismic-related ground failure, including liquefaction?
 - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- Be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994 or latest version), creating substantial risks to life or property?
- Have soils incapable of adequately supporting the use of septic tanks or alternate wastewater disposal systems where sewers are not available for the disposal of wastewater?

The following is a discussion of potential effects of the proposed project for each of these criteria.

Fault rupture. No impact. Implementation of the proposed project will not expose persons to impacts involving fault rupture. The proposed project would not involve construction of any habitable structures, and therefore would not increase risks of loss, injury, or death associated with fault rupture hazards.

Seismic ground shaking. No impact. The project would not involve construction of any habitable structures, and therefore would not increase risks of loss, injury, or death associated with ground shaking hazards.

Seismic ground failure, including liquefaction. No impact. Activities associated with the pipeline excavation are not expected to increase risks of loss, injury, or death due to the potential for liquefaction.

Landslides or mudflows. No impact. The proposed project is in an area of generally flat areas and no existing landslide or mudflow features have been mapped or identified in the vicinity of the proposed project. None of the activities associated the pipeline excavation are expected to contribute to increased risks of loss, injury, or death due to potential for landslides or mudflows.

Erosion or loss of topsoil. No Impact. The proposed project will only involves the excavation small areas around the pipeline for inspection and possibly repair, which will be backfilled with excavated native soil. Due to the very limited disturbance, erosion is not anticipated to be a problem, but erosion and sediment control best management practices will be implemented.

Liquefaction or subsidence of the land. No impact. The project will not involve construction of any habitable structures or other facilities, and therefore would not increase risks associated with land subsidence.

Expansive soils. No impact. The proposed pipeline excavation will not be affected by expansive soils.

Septic tanks and wastewater disposal. No impact. There are no septic tank or wastewater facilities or services required as part of this project.

2.6.3 Mitigation Measures

Because implementation of the proposed project will not result in significant adverse effects on geology and soils, no mitigation measures are required.

2.7 Greenhouse Gas Emissions

The framework for regulating Green House Gas (GHG) emissions in California falls under the implementation requirements of Assembly Bill (AB) 32. In 2006, the California State Legislature signed the Global Warming Solutions Act of 2006 or AB 32. This law requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures such that statewide GHG emissions are reduced in a technologically feasible and cost-effective manner to 1990 levels by 2020. The statewide 2020 emissions limit is 427 million metric tons carbon dioxide equivalent (CO₂e) (ARB, 2007). Carbon dioxide emissions account for approximately 90 percent of the statewide GHG emissions (ARB, 2007). Methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride emissions account for the remainder of the statewide GHG emissions (ARB, 2007).

2.7.1 Setting

As mentioned in Section 2.3 Air Quality above, the proposed project is located in the Bay Area Air Quality Management District (BAAQMD). The air quality in the vicinity of the project is likely better than the reported air quality for the BAAQMD since it is not near concentrated urban development. Potential emissions from the proposed project will be limited to construction vehicle emissions and dust from vehicle traffic and excavation.

2.7.2 Environmental Impacts

The proposed project will have a significant adverse effect on air quality if it will:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

The following is a discussion of potential effects of the proposed project for each of these criteria.

Generate greenhouse emissions. Less than significant. Potential short-term impacts from the Project may result from construction activities. As described in Section 2.16 Transportation and Circulation below, construction of the project will only require approximately three or four vehicles accessing the work sites via public streets and roads on a daily basis for one week at each site. The Project will result in minor air emissions from minimal construction vehicle emissions. These activities are already part of the maintenance and operation of the existing gas pipelines. Therefore, operation emissions would not be expected to cause or contribute to an air quality violation. Since the Project will result in only limited air emissions during construction, no impact will occur and subsequently, no mitigation is required. However PG&E is committed to the application of GHG reduction Avoidance and Protection Measures on facilities, including this Project.

Conflict with an applicable plan, policy or regulation. Less than significant. The proposed project will not result in new stationary sources of emissions, so no standards will be violated. Because the potential for exhaust GHG emissions from construction vehicles is expected to fall below the GHG impact thresholds, no emission modeling was conducted. The short-term

increase in GHG emissions during construction activities would be imperceptible when compared to the ARB's estimated 2020 emission limit of 427 million metric tons CO₂e. Therefore, construction GHG emissions will not interfere with ARB's long-term goal to reduce GHG emissions to 1990 levels by 2020. Further, as discussed below, PG&E is committed to apply GHG reduction measures for all facilities. Therefore, as discussed below, PG&E's incorporation of avoidance and protection measures into Project design will further ensure that GHG emission impacts are less than significant.

2.7.3 Mitigation Measures

PG&E has incorporated additional Avoidance and Protection Measures (APMs) into the Project description to minimize the Project's Greenhouse Gas air emissions. All PG&E standard practices are also considered avoidance measures and are considered part of the Project. To further reduce GHG emissions from Project construction (specifically CO₂); the following measures will be implemented:

- 1: Encouraging the use of bio-diesel fuel for diesel-powered equipment and vehicles.
- 2: Encouraging construction workers to carpool.
- 3: Encouraging the recycling of construction waste.
- 4: Idling of construction vehicles will be kept to the minimum required to perform the work. Unnecessary engine idling is discouraged.

The Project's contribution to cumulative GHG emissions will be less than significant.

2.8 Hazards and Hazardous Materials

2.8.1 Setting

Hazardous materials present during project construction include only diesel fuel and lubricants used/consumed by the construction equipment. These materials will not be stored in the project work area. Equipment will be fueled and serviced either at local service stations. No other hazardous materials will be stored or used at the project sites during operation or maintenance. The three sites are more than five miles from the Byron Airport and would not impact its operation.

2.8.2 Environmental Impacts

The proposed project will have a significant adverse effect from hazards or hazardous materials if it will:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or to the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The following is a discussion of potential effects of the proposed project for each of these criteria.

Transport, use or disposal of hazardous materials. No impact. The only potentially hazardous materials are common vehicle and equipment fuels and lubricants. Standard precautions will be taken to ensure any vehicle service or fueling in the project work area will not result in a spill.

Upset and accident conditions. No impact. There is no apparent potential for accident and upset conditions that would be associated with the proposed pipeline excavation.

Hazardous emissions or acutely hazardous materials within ¼ mile of a school. No impact. The project does not have the potential for hazardous emissions and is not within ¼ mile of a school.

Be located on a hazardous material site. No impact. There are no hazardous material sites within a mile of the project sites.

Projects located within an airport land use plan or within the vicinity of a private airstrip. No impact. The existing gas pipeline is below ground so the proposed excavation will not affect navigable air space or people residing or working in the vicinity of the airport.

Emergency response plan. No impact. The project will not interfere with any adopted emergency plan.

Wildland fires: No impact. The project area is annual grass lands that are used for grazing. While these grasslands would be subject to wildfires, PG&E vehicles and construction equipment include fire suppression equipment, so the project will not likely result in a wildfire or expose people or structures to potential wildfire impacts.

2.8.3 Mitigation Measures

Implementation of the proposed project will not result in the release of hazardous materials or potentially create hazardous conditions; therefore no mitigation measures are necessary.

2.9 Hydrology and Water Quality

2.9.1 Setting

The three sites are located in flat lowland grass lands. The Springtown Wetland Reserve located immediately south of Site 3 is known to support vernal pool fairy shrimp (CDFG 2008) and is designated critical habitat for vernal pool fairy shrimp (Unit VERFS 19C). Although this unit includes primarily lowland vernal pool habitat associated with the Springtown Wetland Reserve, a portion of the unit covers the 0.1 miles (650 feet) of access road to the anomaly at Site 3. None of the sites are within a 100-year flood zone as delineated on the Flood Insurance Rate (FIRM) maps.

2.9.2 Environmental Impacts

The proposed project will have a significant adverse effect on hydrology and water quality if it will:

- Violate any water quality standards or waste discharge requirements?
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local

groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

- Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river in a manner which would result in substantial erosion or siltation on- or off-site?
- Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- Create or contribute runoff water which would exceed the capacity of existing or planned storm water discharge or provide substantial additional sources of polluted runoff?
- Otherwise substantially degrade water quality?
- Place housing or other structures which would impede or re-direct flood flows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- Expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a dam or levee?
- Inundation by seiche, tsunami, or mudflow.

The following is a discussion of potential effects of the proposed project for each of these criteria.

Violate water quality standards. No impact. The State Water Resource Control Board is expected to issue a Section 401 Water Quality Certification for the project following completion of this environmental review.

Substantially deplete Groundwater. No impact. The project will not utilize ground water or affect groundwater supplies.

Substantially alter the existing drainage pattern and create erosion or siltation. No impact. The project will temporary remove vegetation in small areas and will be revegetated at the end of the project. The excavation areas are very small and will not substantially alter the existing drainage pattern. Erosion and sediment control measures will also be implemented to minimize the risk of run-off.

Substantially alter the existing drainage pattern and create flooding. No impact. The minor excavation that will be performed as part of the project should not result in flooding and will not substantially alter the existing drainage pattern. Erosion and sediment control measures will also be implemented to minimize the risk of flooding.

Create or contribute to runoff water. No impact. The project will not impact any streams or change the volume of surface runoff.

Substantially degrade water quality. No impact. The State Water Resource Control Board is expected to issue a Section 401 Water Quality Certification for the project following completion of this environmental review.

Place housing within the 100-year flood zone. No Impact. There is no housing within miles of the sites and the sites are not within the FIRM 100-year mapped flood zone.

Place structures within the 100-year flood zone

Expose people or structures to loss. No impacts. There are no people or structures within miles of in the project areas and therefore no risk of expose to loss.

Inundation by a seiche, tsunami or mudflow. No impact. The project area, due to its geographical location, is not susceptible to potential impacts from dam failure or inundation by a seiche, tsunami or mudflow.

2.9.3 Mitigation Measures

Implementation of the proposed project will not result in any potentially significant effects on

hydrology and/or water quality; therefore no mitigation measures are necessary.

2.10 Land Use and Planning

2.10.1 Setting

Sites 1 and 2 are located within grazed annual grasslands. Site 3 is located in annual grasslands used for cattle grazing and utilities. The general land use designation for sites 1 and 2 in Contra Costa County is Public and Semi-public (PS) and includes properties owned by public governmental agencies as well as privately owned transportation and utility corridors such as PG&E lines. The general land use designation for site 3 in Alameda County is Large Parcel Agriculture is the land use designation for the site. This land use designation allows agricultural uses, public and quasi-public uses, quarries, windfarms and related facilities, utility corridors, and similar uses compatible with agriculture. The site is located in the East County Area.

2.10.2 Environmental Impacts

The proposed project will have a significant adverse effect on land use and planning if it will:

- Physically divide an established community?
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- Conflict with any applicable habitat conservation plan or natural community conservation plan?

The following is a discussion of potential effects of the proposed project for each of these criteria.

Divide a community. No impact. The Project does not entail any land use change or division and would affect any community.

Conflict with local land use regulations or policies. No impact. The proposed project will not affect the continued use of the land for agricultural use and would not conflict with any land use regulations or policies. Additionally, the California Public Utilities Commission has confirmed that local jurisdictions acting pursuant to local authority are preempted from regulating electric and natural gas projects constructed by public utilities subject to Commission jurisdiction.

Conflict with a conservation plan. No impact. The proposed project will not affect any conservation areas or plans.

2.10.3 Mitigation Measures

Implementation of the proposed project will not result in any potentially significant effects to land use and planning, therefore no mitigation measures are necessary.

2.11 Mineral Resources

2.11.1 Setting

The three sites are located in flat, grassland areas. Site 2 is located in the vicinity of an area identified as a geological deposit of demogine sandstone, located just south of Camino Diablo and east of Vasco Road. Demogine sandstone is used by PG&E as trench backfill and is a primary ingredient in the manufacture of heat-resistant glass used in the national space program. The General Plan calls for protection of the sandstone resource area as it is the sole deposit of

this material in the State of California, and an important resource nationally.¹⁸ However, the project activities will not impact this resource.

2.11.2 Environmental Impacts

The proposed project will have a significant adverse effect on mineral resources if it will:

- Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?
- Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The following is a discussion of potential effects of the proposed project for each of these significance criteria.

Loss of a known resource of future value to the State. No impact. The proposed excavation and backfill at Site 2 will not affect the sandstone formation to the south.

Loss of a locally important resource. No impact. The proposed excavation and backfill at Site 2 will not affect the sandstone formation to the south.

2.11.3 Mitigation Measures

Implementation of the proposed project will not result in any potentially significant effects to mineral resources; therefore no mitigation measures are necessary.

2.12 Noise

2.12.1 Setting

Both Alameda and Contra Costa Counties have adopted a Noise Element as part of their General Plan. The objectives of these noise elements are to minimize the amount of noise that future development creates and the amount of noise to which the community is exposed. Contra Costa County General Plan Noise Element indicates that acceptable noise levels for agricultural uses is less than 75 dBA but there are no standards for temporary construction noise for this land use.

The primary sources of noise in the vicinity of the sites are from vehicle traffic along the adjacent Camino Ramon and Vasco Roads and Hwy 580. There are no sensitive receptors that might be affected by the project activities. The project noise sources will be limited to the operation of construction equipment described above. The typical sound level for these types of vehicles and equipment is between 85 and 90 dBA at 50 feet and drops significantly with distance. Since the sites are more than 50 feet away from the roads, the construction noise levels should not be that distinguishable.

2.12.2 Environmental Impacts

The proposed project will have a significant adverse effect on the existing noise environment if it will:

- Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- exposure of persons to, or generation of, excessive groundborne vibration or groundborne

¹⁸ Contra Costa County General Plan, Conservation Element,

noise levels.

- a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing in or working in the project area to excessive noise levels?
- For a project within the vicinity of a private airstrip, would the project expose people residing in or working in the project area to excessive noise levels?

The following is a discussion of potential effects of the proposed project for each of these significance criteria.

Noise level in excess of local ordinances. No impact. There are no sensitive receptors near the sites and no permanent noise sounds as part of the project so local noise levels and limitations will not be exceeded.

Permanent increase in noise levels. No impact. There are no permanent noise sounds as part of the project. The construction noise is temporary for a very short duration and the proposed project will not produce any noise during operations.

Temporary increase in ambient noise levels. No impact. While a temporary increase in noise will occur during construction of the project, there are no sensitive receptors near any of the sites. Additionally the project sites are located approximately 50 feet from the roads and the temporary construction noise levels for less than a week will not significantly changes noise levels above existing traffic levels.

Project within airport land use. No Impact. There is not an airport within 1000 feet of the project sites.

Project within vicinity of private airstrip. No Impact. There is not a private airstrip within 1000 feet of the project sites.

2.12.3 Mitigation Measures

Implementation of the proposed project will not result in any potentially significant effects to the existing noise environment; therefore no mitigation measures are necessary.

2.13 Population and Housing

2.13.1 Setting

The proposed project is located entirely in undeveloped agricultural lands used for grazing. The nearest communities are at Brentwood, approximately two miles northwest of Site 1 and North Livermore, approximately half of a mile south from Site 3.

2.13.2 Environmental Impacts

The proposed project will have a significant adverse effect on population and housing if it will:

- Induce substantial population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The following is a discussion of potential effects of the proposed project for each of these significance criteria.

Induce substantial population growth. No impact. The purpose of the proposed project is to excavate, inspect and repair, if necessary, an existing natural gas pipeline which will have no effect on local population growth.

Displace a substantial number of housing or people. No impact. The proposed project will not displace or otherwise affect any people or housing.

2.13.3 Mitigation Measures

Implementation of the proposed project will not result in any potentially significant effects on population or housing; therefore no mitigation measures are necessary.

2.14 Public Services

2.14.1 Setting

Public services in the project area are provided by Alameda and Contra Costa Counties, and at the three sites no public services are presently provided.

2.14.2 Environmental Impacts

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire and police protection, schools, parks and/or other public facilities.

Fire, Police Protection, Schools, Parks, and other public facilities. No Impact. The proposed project will not require any public services so there will be no impact.

2.14.3 Mitigation Measures

Implementation of the proposed project will not result in any potentially significant effects on the provision of public services; therefore no mitigation measures are necessary.

2.15 Recreation

2.15.1 Setting

There are no developed public recreation areas affected by the proposed project.

2.15.2 Environmental Impacts

The proposed project will have a significant adverse effect on local recreation if it will:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

The following is a discussion of potential effects of the proposed project for each of these

significance criteria.

Increase the use of recreational facilities. No impact. The proposed project will not result in any population increase nor will it change the recreational habits of local residents.

Require the construction of new recreational facilities. No impact. The proposed project will not result in the need for additional or expanded recreational facilities.

2.15.3 Mitigation Measures

Implementation of the proposed project will not result in any potentially significant effects on the provision of recreational services or recreational facilities, therefore no mitigation measures are necessary.

2.16 Transportation and Circulation

2.16.1 Setting

Temporary access to Site 1 is immediate adjacent to Camino Diablo Road at which this road intersects the existing PG&E pipeline easement. The Site 2 temporary access route is 400 feet length and 20 feet wide. The temporary access route is presently adequate for construction vehicle access and will not be graded. Access to Site 3 is located north of an existing Line 303 valve lot off Raymond Road and is 20-foot and approximately 800 feet long with approximately 1,200 square feet in a season wetland.

2.16.2 Environmental Impacts

The proposed project will have a significant adverse effect on transportation and circulation if it will:

- Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access.
- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The proposed project will generate very limited construction traffic and will not impact existing traffic or circulation patterns. The proposed project will not require any new access roads or circulation routes – the existing access roads and routes will be used. All construction equipment and activity will be located off existing roads and streets. The following is a discussion of potential effects of the proposed project for each of these significance criteria.

Exceed the capacity of the existing circulation system. No impact. Construction of the project will only require approximately three or four vehicles accessing the work sites via public streets and roads on a daily basis for one week at each site.

Conflict with an applicable congestion management program. No impact. The three or four vehicles a day for a week at a site will not impact the level of service in the area or conflict with the congestion management program.

Result in a change in air traffic patterns. No Impact. The project will not have any impact on air traffic patterns or safety risks.

Increase design hazards or incompatible uses. No impact. The proposed project will not modify any existing roads so potential hazards will not be created. All construction vehicles are either street-legal and capable of normal speed and maneuverability or will be trailered to the sites.

Inadequate emergency access. No impact. The proposed project will not require the closure of any roads or otherwise potentially impede emergency access routes.

Conflict with adopted polices, plans for alternative transportation. No impact. The project will only require approximately three or four vehicles accessing the three work sites via public streets and roads on a daily basis for one-week duration at each site and will not conflict with adopted plans for alternative transportation.

2.16.3 Mitigation Measures

Implementation of the proposed project will not result in any potentially significant effects on transportation or circulation facilities; therefore no mitigation measures are necessary.

2.17 Utilities and Service Systems

2.17.1 Setting

There are no structures or other facilities at the project sites which require water, waste water, storm water and solid waste services and facilities and these services are not provided in the vicinity of the three sites.

2.17.2 Environmental Impacts.

The proposed project will have a significant adverse effect on utilities and service systems if it will:

- Exceed wastewater treatment requirements of the applicable State Water Resource Control Board?
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- Comply with federal, state, and local statutes and regulations related to solid waste?

Exceed wastewater treatment requirements. No impact. The project does not require any wastewater treatments services.

Require or result in the construction of new water or wastewater treatment. No impact.

The project does not require any water or wastewater treatments services.

Require or result in the construction of new storm water drainage facilities. No impact.

The project does not require any storm water drainage services.

Result in a determination by the wastewater treatment. No impact. The project does not require any wastewater treatments services and will result in a determination for wastewater treatment.

Be served by a landfill with sufficient permitted capacity. No impact. The project does not require any landfill services.

The proposed project will not require any water or generate any wastewater, contribute to or otherwise affect the storm water systems nor would it generate any solid waste, so there will be no impact to utilities and service systems. There are sufficient water supplies available to serve the project's minimal water needs.

2.17.3 Mitigation Measures

Implementation of the proposed project will not result in any potentially significant effects on utilities and service systems, therefore no mitigation measures are necessary.

2.18 MANDATORY FINDINGS OF SIGNIFICANCE

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)
- c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Discussion:

- a) **Less than significant with mitigation.** Seven federal and/or state listed threatened or endangered species are either known to occur or presence has been assumed in the project area. These species or their habitats are potentially subject to project-related impacts. The Service has determined in its biological opinion that the proposed Gas Line 303 ILI Repair Project is not likely to jeopardize the continued existence of the California red-legged frog, California tiger salamander, San Joaquin kit fox, long horn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp current status. Although designated critical habitat for vernal pool fairy shrimp and proposed critical habitat for the California red-legged frog will be affected, none will be destroyed or adversely modified by the project¹⁹. In the Biological Opinion issued by the Service, conservation measures and terms and conditions for reasonable and prudent measures were included (and are detailed in the biological resources Section 2.4) which would mitigate the potential impacts to the species to least than significant.

¹⁹ USFWS Biological Opinion for the PG&E Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009

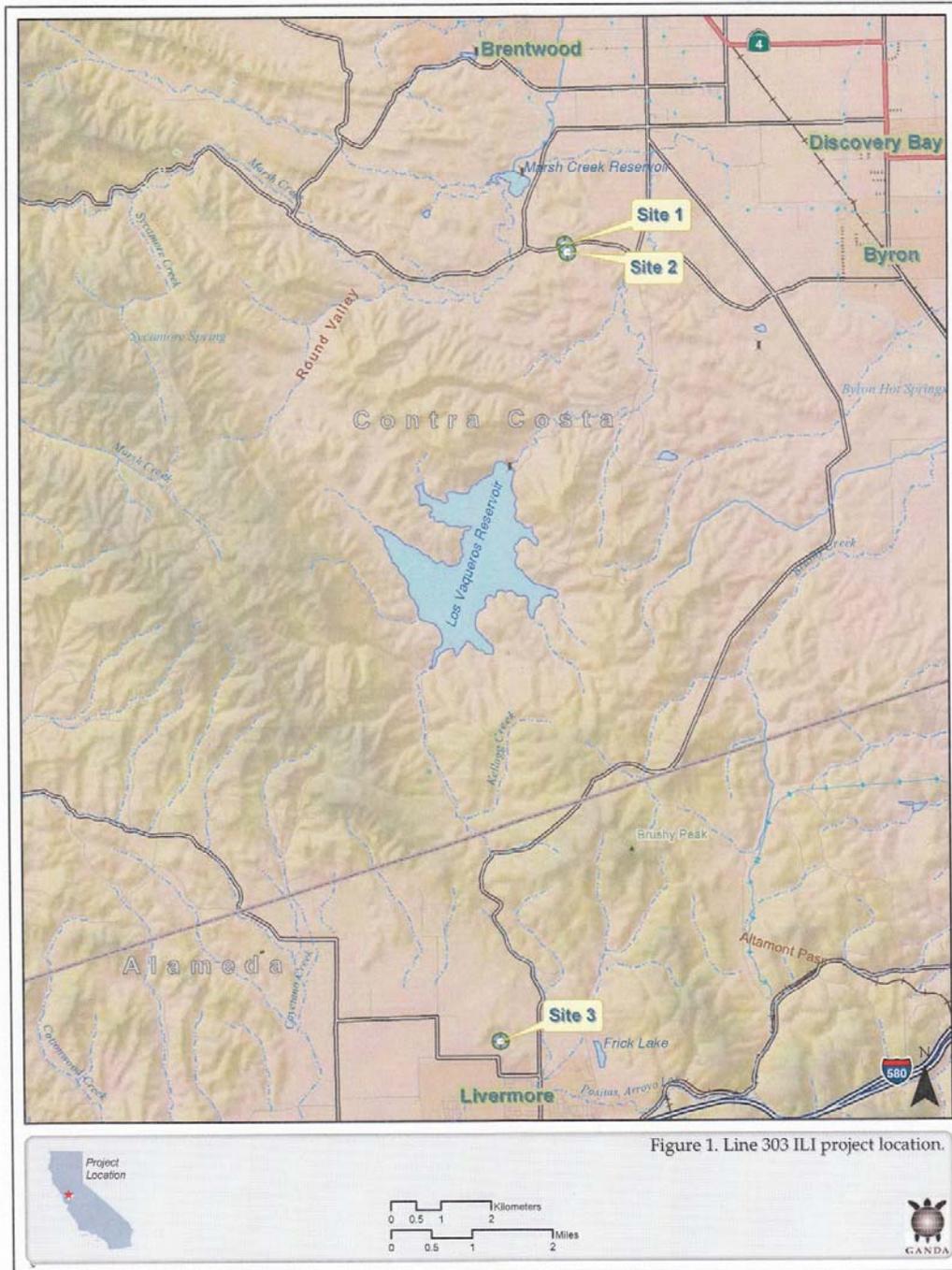
- b) **No Impact.** The proposed Line 303 In Line Inspection Project will not have a cumulative significant impact on the environment. The direct examination of the line is necessary to insure the safety and reliability of the pipeline. The examination of the pipeline does not generate any other activity or impact nor is it related to any development project.
- c) **No Impact.** The proposed Line 303 In Line Inspection Project will not cause substantial adverse effects on human beings, either directly or indirectly. The location of the proposed Line 303 In Line Inspection Project is grassland that is annually grazed and only represents a small portion of the thousands of acres of land that is grazed around the three sites. There are no urbanized or residential areas within 1/4 mile of the Project.

3.0 REPORT PREPARATION

3.1 Literature Cited and References Reviewed

- Contra Costa County General Plan 2005-2020, January 2005,
- East County Area Plan of the Alameda County General Plan: (November 2000)
- Biological Assessment for Pacific Gas and Electric Company's Line 303 In-Line Inspection Project dated May 2009 and prepared by Garcia and Associates
- Garcia and Associates email dated August 17, 2009
- Delineation of Wetlands and Waters of the US for PG&E's Line 303 In-Line Inspection Project dated May 2009, prepared by Garcia and Associates
- email messages date July 31, 2009 from Garcia and Associates
- Cultural Resources Inventory Report for Line 303 ILI Inspection and Repair Project, Contra Costa and Alameda Counties, prepared by Garcia and Associates dated March 2009 and Memo to Chrisophe Descantes, PG&E from Garcia and Associates dated July 13, 2009 Regarding Archeological Testing Results for the Line 303 ILI Repair Project.
- August 26, 2009 Letter from the Army Corps of Engineers, File No. 2009-00143S verifying the wetlands delineation
- Archeological Testing Results for the Line 303 ILI Repair Project, dated July 2009 and prepared by Garcia and Associates
- USFWS Biological Opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S), dated November 2, 2009 and the Service's January 26, 1999, Programmatic Formal Endangered Species Act Consultation on the Issuance of Permits under Section 404 of the Clean Water Act or Authorization under the Nationwide Permit Program for Projects that May Affect the California Red-legged Frog

Figure 1: Project Location



Appendix A: Biological Assessment

[APPENDIX A ENCLOSED AS SEPARATE PDF FILE]

**Appendix B: Delineation of Wetlands and Waters of the United States for
Pacific Gas and Electric Company's Line 303 In-Line Inspection Project**

[APPENDIX B ENCLOSED AS SEPARATE PDF FILE]

Appendix C **Cultural Resources Inventory Report for Line 303 ILI Inspection and Repair Project, Contra Costa and Alameda Counties, prepared by Garcia and Associates dated March 2009 and Memo to Chrisophe Descantes, PG&E from Garcia and Associates dated July 13, 2009 Regarding Archeological Testing Results for the Line 303 ILI Repair Project.**

**CULTURAL RESOURCES REPORT
AVAILABLE TO QUALIFIED PERSONS, AGENCIES, AND TRIBES**

Appendix D: USFWS has issued a Biological Opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S) and Service's January 26, 1999, *Programmatic Formal Endangered Species Act Consultation on the Issuance of Permits under Section 404 of the Clean Water Act or Authorization under the Nationwide Permit Program for Projects that May Affect the California Red-legged Frog*

[APPENDIX D ENCLOSED AS SEPARATE PDF FILE]

Appendix E: Environmental Impact Assessment Checklist

**STATE WATER RESOURCES CONTROL BOARD
DIVISION OF WATER QUALITY
P.O. BOX 100
SACRAMENTO, CA 95812-0100**

Environmental Checklist

ENVIRONMENTAL CHECKLIST

I. Background

Project Title: PG&E Line 303 In-Line-Inspection and Repair Project

Contact Person:

Ms. Patricia Sanchez, Planner
(415) 973-8250

Project Description:

The 2008 In-Line Inspection (ILI) of PG&E's 36-inch high pressure natural gas transmission Line 303 disclosed three anomalies requiring external direct examination and possible repair. Excavation and visual inspection is required to confirm whether or not remedial actions are necessary. Anomalies are deviations from expected conditions detected during prior in-line inspections. PG&E proposes to excavate at these three locations to visually inspect the conditions of the pipeline, assess the corrosion protection around the pipeline, and if necessary repair the pipeline. Site Locations are: Site 1 -121 degrees 42'52"/ 37 degrees 52'38"; Site 2 - 121 degrees 42'48"/ 37 degrees 52'30"; Site 3 -121 degrees 43'59"/ 37 degrees 43'55"

Each pipeline anomaly will require an excavation area of approximately 10 feet long, 20 feet wide, and 10 feet deep (2000 cubic feet or 74 cubic yards) to expose the pipe and facilitate inspection and repair work. Approximately 74 cubic yards of earth will be removed at each site and stockpiled along side of the pipe within the work area and outside of any wetland areas. The soil will be replaced once the inspection and repair work has been completed. The work area surrounding each anomaly will be approximately 50 feet by 50 feet and will be enclosed by exclusion fencing. The temporarily impacted areas will be restored to pre-construction conditions using a native seed mix appropriate for the area²⁰

When direct examination of the pipeline is required, PG&E will then expose and remove the pipeline coating, sandblast and inspect the pipeline including measuring and recording metal loss on the surface of the pipe, and repair the pipeline if necessary. The pipeline will then be recoated with a protective epoxy coating, the pipe trench will be backfilled, and the procedure documented for the records.

The temporary work area at each site will be approximately 50 feet in length and 50 feet wide (2,500 sq ft or 0.057 acres for each site or 0.172 acres for the three sites). Temporary access to Site 1 is immediately adjacent to Camino Diablo Road where this road intersects the existing PG&E pipeline easement. The Site 2 temporary access route is 400 feet in length and 20 feet wide. The temporary access route is presently

²⁰ USFWS Biological Opinion for the PG&E Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009

adequate for construction vehicle access and will not be graded. Access to Site 3 is located north of an existing Line 303 valve lot off Raymond Road and is 20-feet wide and approximately 800 feet long. The access route to Site 3 crosses an alkali swale, in which a seasonal wetland occurs. Temporary impacts of 0.030 acres to the swale will be minimized by placement of appropriate crossing structures which span the swale. The crossing structure will be approximately 24 feet long and 16 feet wide.²¹

II. Environmental Impacts and Mitigation Measures

The environmental factors checked below could be potentially affected by this project. See the checklist on the following pages for more details. Attached are supporting studies consisting of the Biological Assessment, Wetlands Delineation Report, and the Cultural Resources Investigation Report and Archeological Testing Results and the Army Corps of Engineers Letter dated August 26, 2009 in reference to file no. 2009-00143S verifying the wetland delineations. Mitigation Measures proposed for each identified potential impact are presented in this discussion.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

²¹ Ibid

1. AESTHETICS. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Have a substantial adverse effect on a scenic vista. No Impact. Sites 1 and 2 are located adjacent to Camino Diablo and Vasco Roads, which are scenic routes as designated in the Contra Costa County 2005-2020 General Plan. The project will result in the temporary loss of annual grassland surface vegetation over a very small area which is not visible from a public road; therefore no changes in the existing views would occur as a result of the project. No aesthetic impacts to the scenic vistas will occur.

Substantially damage scenic resources. No Impact. The proposed project will result in temporary loss of annual grassland surface vegetation over a small area which will not damage scenic resources.

Degrade the existing visual character. No Impact. The proposed project will result in temporary loss of annual grassland surface vegetation over a small area which is not visible from a public road.

Create light or glare. No impact. No lighting is required for the project; therefore the proposed project will not produce any light or glare.

2. **AGRICULTURAL AND FOREST RESOURCES.** In determining whether impacts to agricultural resources are significant environmental impacts, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping & Monitoring Program of the California Resources Agency, to non-agricultural uses? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined by Public Resources Code section 4526)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Convert Special Status Farmland. No impact. Grazing will continue as the land use once the project is completed; the project will not result in a change in land use.

Conflict with zoning for agricultural use or Williamson Act. No impact. The project will not result in a change in zoning. Since the proposed project will not affect the long-term agricultural use of the affected properties, the status of any properties currently under Williamson Act contract will not be affected.

Conflict with existing zoning or cause rezoning of forest land. No Impact. There are no forest lands within 1000 feet of the project. No zoning changes are proposed.

Result in the loss of forest land. No Impact. There are no forest lands within 1000 feet of the project.

Result in conversion of farmland to non-agricultural use. No impact. The project will not result in the conversion of any agricultural or farmlands to any other use. No land use changes are proposed.

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Conflict with an air quality plan. No impact. The only emissions associated with the proposed project will be the temporary exhaust emissions and fugitive dust from construction equipment, which would be minimal and would not violate any existing air quality standards or plans, nor result in a measurable net increase in any pollutant for the project region. There will be no combustion emissions associated with the operation of the proposed project. Construction vehicle traffic will be minimal, but Best Management Practices (BMPs) will be implemented to minimize the generation of fugitive dust if needed. Therefore, the project will not conflict with or obstruct implementation of applicable air quality plan.

Violate an air quality standard. No impact. The proposed project will not result in new stationary sources of emissions, so no standards will be violated.

Expose sensitive receptors. No impact. The proposed project is not near any sensitive receptors.

Result in cumulative increases in pollutants. No impact. The excavation and repair of the pipeline are of short duration and there will be no operations emissions. Consequently, the project will not result in a cumulative increase of pollutants.

Create objectionable odors. No impact. The proposed project will not create odors.

4. BIOLOGICAL RESOURCES. Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the Department of Fish and Game (DFG) or U.S. Fish and Wildlife Service (USFWS)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the DFG or USFWS? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

A biological assessment of the project area was performed in May 2009 by PG&E. The report determined that seven federally listed species are present or have the potential to occur in the project vicinity: California red-legged frog (CRLF), California tiger salamander (CTS), San Joaquin kit fox, Conservancy fairy shrimp, long horn fairy shrimp, vernal pool tadpole shrimp, and vernal pool fairy shrimp (VPFS). The proposed access road to Site 3 is located within designated critical habitat (Unit 19C) for vernal pool fairy shrimp. Access to the Project Area will require a limited amount of vehicle and tracked excavator traffic across 0.18 acres (7,920 sq. ft.) of this critical habitat, which does not contain vernal pool habitat. None of the three anomalies are located within critical habitat. Sites 1 and 2 lie within proposed CRLF critical habitat (Unit CCS-2) and Site 3 lies within proposed CRLF critical habitat Unit ALA-2 (USFWS 2008)²².

Special Status Wildlife

Seven federal and/or state listed threatened or endangered species are either known to occur or presence has been assumed in the project area. These species or their habitats are potentially subject to project-related impacts. The Service has determined in its biological opinion that the proposed Gas Line 303 ILI Repair Project is not likely to jeopardize the continued existence of the California red-legged frog, California tiger salamander, San Joaquin kit fox, long horn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp current status. Although designated critical habitat for vernal pool fairy shrimp and proposed critical habitat for the California red-legged frog will be affected, none will be destroyed or adversely modified by the project²³. The following

²² Biological Assessment for Pacific Gas and Electric Company's Line 303 In-Line Inspection Project dated May 2009 and prepared by Garcia and Associates

²³ USFWS Biological Opinion for the PG&E Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009

discusses the specific impacts anticipated for each species.

California Red-legged Frog: Less than significant with mitigation incorporated. Sites 1 and 2 lie within proposed CRLF critical habitat (Unit CCS-2) and Site 3 lies within proposed CRLF critical habitat Unit ALA-2 (USFWS 2008)²⁴. The biological assessment report also indicated that the entire project will result in approximately 0.077 acres of temporary impacts to potential CRLF estivation habitat and to 0.451 acres of potential dispersal habitat. The USFWS issued the Biological Opinion for the Pacific Gas and Electric Company Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009, which determined that the project would be exempt from the prohibitions of section 9 of the Act, if the Corps ensures that PG&E complies with the terms and conditions of the Biological Opinion, which implements reasonable and prudent measure detailed in the Opinion including the provisions of the *January 26, 1999, Programmatic Formal Endangered Species Act Consultation on the Issuance of Permits under Section 404 of the Clean Water Act or Authorization under the Nationwide Permit Program for Projects that May Affect the California Red-legged Frog (Rana aurora draytonii)* (Programmatic Consultation). The USFWS has estimated that all California red-legged frogs inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio. Compliance with these provisions and the mitigation measures would reduce the impacts to less than significant.

Vernal Pool Fairy Shrimp, Long horn Fairy Shrimp and Vernal Pool Tadpole Species.

Less than significant with mitigation incorporated. The proposed access road to Site 3 is located within designated critical habitat (Unit 19C) for vernal pool fairy shrimp; access to the Project Area will require a limited amount of vehicles and a tracked excavator to drive across 0.18 acres (7,920 sq. ft.) of this critical habitat, which does not contain vernal pool habitat. Per the Biological Opinion issued for the project, the USFWS has estimated that all longhorn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp inhabiting 0.3 acre of seasonal wetlands will be subject to incidental take as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio. Compliance with these provisions and the mitigation measures would reduce the impacts to less than significant.

California Tiger Salamander. Less than significant with mitigation incorporated. The biological assessment prepared by GANDA determined that approximately 0.218 acres of potential California tiger salamander estivation habitat and 0.31 acres of potential dispersal habitat would be temporarily impacted by project related activities. Per the Biological Opinion issued for the project, the USWFS has determined that impacts to all California tiger salamanders inhabiting 0.5 acres will be subject to incidental take in the form of harm, harassment, capture, injury and death. The USFWS has estimated that all California Tiger Salamander inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio. Compliance with these provisions and the mitigation measures would reduce the impacts to less than significant.

San Joaquin Kit Fox. Less than significant with mitigation incorporated. The nearest CNDDB record is 0.5 miles west of Site 1. Due to the mobile nature of kit fox and their ability to travel relatively long distances, they are assumed to travel through the project sites. Per the Biological Opinion issued for the project, the USFW has determined that impacts to all of the San Joaquin kit foxes inhabiting or utilizing areas with 0.5 acre will be subject to incidental take in the form of

24 Biological Assessment for Pacific Gas and Electric Company's Line 303 In-Line Inspection Project dated May 2009 and prepared by Garcia and Associates

harm and harassment. CDFG concurs with the Service's determination regarding the San Joaquin kit foxes impacts. PG&E will compensate for effects to listed San Joaquin kit foxes, with a minimum three to one compensation ratio as requested by CDFG. Compliance with these provisions and the mitigation measures would reduce the impacts to less than significant.

Riparian habitat or other sensitive natural community. No impact. There is no riparian habitat or other sensitive natural community within the Project Area.

Wetlands. A wetland delineation report was prepared by U.S. Army Corps of Engineers in May 2009, which determined that three jurisdictional wetland features are present in the Line 303 in line inspection project area.

At Site 1, a seasonal wetland and a vernal pool feature are present.

The Site 1 seasonal wetland depression that is over the pipeline anomaly is 0.017 ac. as reported in the USFWS Biological Opinion (BO) dated Nov. 2, 2009, (USFWS File no. 84120-2009-F-0782-1). All of this wetland may be impacted during the inline inspection and repair work. Temporary impacts to this wetland would occur due to project activities. These impacts will be mitigated through site restoration following pipe inspection and/or repair.

The Site 1 vernal pool feature is located approximately 15 feet east of the pipeline anomaly and is 100 feet long by 50 feet wide or 5000 square feet (0.107 ac). This area will be avoided and will not be impacted by the in line inspection and repair work.

At Site 3, an alkali swale is crossed by the access road. A temporary crossing would create temporary impacts approximately 0.030 ac. (as reported in the USFWS BO). Temporary impacts to this site will be minimized by placement of approved crossing structures. No damage to the site is expected, so no remedial work is expected to be needed after removal of the crossing structures. All excavation at Site 3 will occur in uplands several hundred feet from the swale.

The temporary surface disturbance associated with the project will not result in net loss of wetland area or functions through compliance with the proposed mitigation measures. Because no permanent impacts to wetlands or other waters are expected, and because the temporal impacts would primarily be to wildlife habitat, the compensatory mitigation requirements specified by USFWS shall be considered adequate to address wetland mitigation needs for this project.

Fish and Wildlife Movement: Less than significant with mitigation incorporated. Kit fox may forage in the project area but the short term loss of this very small amount of foraging habitat is not considered significant. Measures to protect San Joaquin kit fox movements are discussed above. Compliance with these provisions and the mitigation measures would reduce the impacts to less than significant.

Local Biological Resource Protection Ordinances. No impact. There are no local biological ordinances that will be affected by the proposed project.

Habitat Conservation Plan. No impact. The East Contra Costa County Habitat Conservation Plan Association (ECCCHCP) has developed a Habitat Conservation Plan/Natural Community Conservation Planning (HCP/NCCP) that provides regional conservation and development guidelines to protect natural resources within eastern Contra Costa County. Sites 1 and 2 are on the periphery of the conservation plan area and would not conflict with the plan provisions. The temporary project impacts will not have an adverse affect any conservation areas or plans. Implementation of the following measures will reduce the potential affects of the proposed project on the above-described resources to less-than-significant levels. Refer to Avoidance

Measures, under Section 1.6 Avoidance, Minimization, Conservation and Reasonable and Prudent Measures Incorporated into the Project.

Mitigation Measures for Biological Resources. The following mitigation measures are proposed to offset potentially significant impacts to biological resources, and will reduce the potential effects of the proposed project on the above-described resources to less-than-significant levels:

APM-BIO-1: PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio as detailed below. PG&E shall provide the U.S. Fish and Wildlife Service (USFWS) and the State Water Board with proof of compensation at least twenty (20) work days prior to ground breaking.

USFWS has estimated that all California red-legged frogs inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio.

Per the Biological Opinion issued for the project, USFWS has estimated that all longhorn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp inhabiting 0.3 acre of seasonal wetlands will be subject to incidental take as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio.

USFWS has estimated that all California Tiger Salamander inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio.

APM-BIO-2: PG&E will implement all minimization measures described in USFWS January 26, 1999, *Programmatic Formal Endangered Species Act Consultation on the Issuance of Permits under Section 404 of the Clean Water Act or Authorization under the Nationwide Permit Program for Projects that May Affect the California Red-legged Frog (*Rana aurora draytonii*)* (Programmatic Consultation).

APM-BIO-3: PG&E will submit the names and credentials of biologists who are proposed to perform preconstruction surveys and monitoring to USFWS for written approval at least 15 days prior to the commencement of any activities. A USFWS-approved biologist will survey the work sites two weeks before the onset of activities. If California red-legged frogs, tadpoles, or eggs or any life stage of California tiger salamander are found, the approved biologist will contact the USFWS to determine if moving any of these life-stages is appropriate. In making this determination USFWS shall consider if an appropriate relocation site exists. If USFWS approves moving animals, the approved biologist shall be allowed sufficient time to move California red-legged frogs and/or California tiger salamander from the sites before work activities begin. Only USFWS-approved biologists will participate in activities associated with the capture, handling, and monitoring of these species. If a California red-legged frog and/or California tiger salamander is found nearby, but outside a site, it will not be disturbed and USFWS will be notified. The biologist will also report any observations of vernal pool fairy

shrimp, long horn fairy shrimp, vernal pool tadpole shrimp, and San Joaquin kit fox.

APM-BIO-4: Before any construction activities begin on the project, a USFWS-approved biologist will conduct a training session for all construction personnel. The training will include a description of the listed species with the potential to occur, their habitat, and the general measures that are being implemented to conserve the species as they relate to the project and the boundaries within which the project may be accomplished (i.e. sites).

APM-BIO-5: A USFWS-approved biologist will be present on the work site until all minimization and avoidance measures have been completed. After this time, a biological monitor, who has been trained per Conservation Measure 3 of the Biological Opinion, will remain on site during all construction activities, and will have the authority to halt any work activity that might result in impacts that exceed the levels anticipated by the Corps, USFWS, and the CDFG during review of the proposed action. If work is stopped, the Corps, USFWS, and CDFG will be notified immediately by the USFWS-approved biologist or on-site monitor.

APM-BIO-6: During project activities, all trash, including that which may attract predators, will be properly contained, removed from the sites, and disposed of on a daily basis. Following construction, all trash and construction debris from sites will be removed.

APM-BIO-7: All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 66 feet from any riparian habitat or water body. PG&E will ensure contamination of habitat does not occur during such operations. Prior to the start of construction, PG&E will prepare a plan to ensure a prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

APM-BIO-8: A USFWS- and State Water Board approved biologist will ensure that the spread or introduction of invasive plant species will be avoided to the maximum extent possible. When practical, invasive exotic plants in the project area will be removed.

APM-BIO-9: Project areas that are disturbed will be revegetated with an appropriate wetland or upland vegetation native seed mix. Appropriate mulch or other surface protection will be applied as needed. For all areas to be excavated topsoil will be stripped, stockpiled separately, and replaced at the end of the backfilling process. Impermeable clay layers in the vicinity of vernal pools, if encountered, should be stockpiled separately and replaced to avoid or minimize potential indirect effects to the hydrology of local vernal pool complexes.

APM-BIO-10: The number of access routes, number and size of staging areas, and the total area of the activity will be limited to the minimum necessary to achieve the project goal. Routes and boundaries will be clearly demarcated, and these areas will be outside of riparian and wetland areas to the extent feasible. For the work in Site 3 where a seasonal wetland cannot be avoided, the 50 x 50 foot area will be delineated by fencing to limit impacts to adjacent wetland habitat. Restoration will be performed where impacts occur in staging areas and access routes.

APM-BIO-11: Work activities will be completed between April 1 and November 1. Should the proponent or applicant demonstrate a need to conduct activities outside this period, the Corps may authorize such activities after obtaining USFWS approval.

APM-BIO-12: PG&E will implement best management practices (BMPs) to control erosion during and after project implementation.

APM-BIO-13: A USFWS-approved biologist will permanently remove any individuals of exotic species, such as bullfrogs, crayfish, and centrarchid fishes from within the project area to the maximum extent possible.

APM-BIO-14: A preconstruction nesting bird survey will be conducted for burrowing owls and other special status birds. If active nests are found, buffers will be established to avoid impact to these species. If adequate buffers cannot be established, construction work will be delayed until after the breeding season is fully completed or CDFG will be contacted to determine further action.

APM-BIO-15: A preconstruction survey for San Joaquin kit fox will be performed 14 to 30 days prior to the beginning of ground disturbance. Surveys will follow guidance described in USFWS's 1999 Standardized Recommendations for Protection of the San Joaquin kit fox prior to or during ground disturbance.

APM-BIO-16: Project-related vehicles should observe a 20 mph speed limit in all project areas, except on county roads and State and Federal highways, particularly at night when San Joaquin kit foxes are most active. To the extent possible, nighttime construction should be minimized. Off-road traffic outside of designated project areas is prohibited.

APM-BIO-17: To prevent inadvertent entrapment of San Joaquin kit foxes, California red-legged frogs or California Tiger salamanders during the construction phase of the project, all excavated, steep-walled holes or trenches more than 2 feet deep should be covered at the close of each working day by plywood or similar materials, or one or more escape ramps constructed of earth fill or wooden planks will be provided. Before such holes or trenches are filled, they should be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, USFWS and CDFG will be notified immediately.

APM-BIO-18: San Joaquin kit foxes, California red-legged frogs, or California tiger salamanders are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of 4-inches or greater that are stored at a construction site for one or more overnight periods should be thoroughly inspected for these species before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a San Joaquin kit fox is discovered inside a pipe, that section of pipe should not be moved until USFWS has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.

APM-BIO-19: To prevent harassment, mortality, or destruction of dens of San Joaquin kit foxes, California red-legged frog and/or California tiger salamander, no dogs, cats, or other pets shall be permitted on project sites.

APM-BIO-20: Steel plates or other equivalent protective measures as approved by the State Water Board, CDFG, and USFWS will be installed across the alkali swale which is crossed by the access route to Site 3, to avoid disturbance to the seasonal wetland and swale at that site.

APM-BIO-21: All excavated material shall be stored in the designated work areas.

APM-BIO-22: Erosion control matting containing plastic mono-filament netting or similar

material containing netting shall not be used at the project site because California red-legged frogs, California tiger salamanders, and San Joaquin kit foxes may become entangled or trapped in it. Acceptable substitutes include coconut coir matting, tackified hydroseeding compounds, or other materials as approved by USFWS and the State Water Board.

APM-BIO-23: All construction activity shall be confined within the Gas Line 303 ILI Repair Project site, which includes temporary access routes and work areas specifically designated and marked for these purposes. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site without authorization from USFWS and the State Water Board.

APM-BIO-24: The Gas Line 303 ILI Repair Project construction area shall be delineated with high visibility temporary fencing at least (4) feet in height, flagging, or other barriers to prevent encroachment of construction personnel and equipment onto any sensitive areas during project work activities. Such fencing shall be inspected and maintained daily until completion of the project. The fencing will be removed only when all construction equipment is removed from the site. Actions within the project area shall be limited to vehicle and equipment operation on existing roads, and designated access routes. No project activities will occur outside the delineated project construction area.

APM-BIO-25: Silt fencing will be used as needed in conjunction with the high visibility fencing to prevent soil and debris from entering sensitive areas. Such fencing shall be inspected and maintained daily until completion of the project. The fencing will be removed only when all construction equipment is removed from the site.

APM-BIO-26: Twenty-four (24) hours prior to any ground disturbance, pre-construction surveys shall be conducted for San Joaquin kit foxes, California tiger salamanders, California red-legged frogs, vernal pool crustaceans, and sensitive plants. These surveys will consist of walking surveys of the project limits and adjacent areas accessible to the public to determine presence of the species.

APM-BIO-27: The project area shall be re-inspected by the monitoring biologist whenever a lapse in construction activity of two weeks or greater has occurred.

APM-BIO-28: Excavations shall be inspected in the morning before construction work starts to ensure that animals have not fallen in the trench or hold.

APM-BIO-29: Only a USFWS- approved biologist will be allowed to trap or capture California tiger salamanders and/or California red-legged frogs.

APM-BIO-30: If requested, during or upon completion of construction activities, the on-site biologist, and/or representative from PG&E shall accompany State Water Board, USFWS, CDFG, and/or Corps personnel on an on site inspection of the site to review project effects on the San Joaquin kit fox, California red-legged frog, California tiger salamander, and/or vernal pool crustaceans and their habitats.

APM-BIO-31: The State Water Board shall ensure that PG&E complies with the Reporting Requirements of this biological opinion.

APM-BIO-32: PG&E shall make the terms and conditions of the biological opinion a required term in all contracts for the project that are issued by them to all contractors.

APM-BIO-33: PG&E shall provide the Resident Engineer or their designee with a copy of the biological opinion, and the Resident Engineer or their designee shall be responsible for implementing the conservation measures and Terms and Conditions of the biological opinion and shall be the point of contact for the project. The Resident Engineer or their designee shall maintain a copy of the biological opinion on-site whenever construction is taking place.

APM-BIO-34: The name and full contact information of the Resident Engineer shall be provided to the State Water Board and USFWS at least thirty (30) calendar days prior to groundbreaking at the project. Prior to ground breaking, the Resident Engineer must submit a letter to the State Water Boards and USFWS verifying that they possess a copy of the biological opinion and have read the Terms and Conditions.

APM-BIO-35: The PG&E on-site monitor shall have oversight over implementation of all the Terms and Conditions of the biological opinion, and shall have the authority to stop project activities, through communication with the Resident Engineer, if any of the requirements associated with these Terms and Conditions are not being fulfilled. If the biologist/construction liaison has requested a stop work due to take of any of the listed species, the USFWS and CDFG will be notified within one (1) working day via email or telephone.

APM-BIO-36: PG&E will compensate for possible take for San Joaquin kit fox habitat to meet CDFG full mitigation requirements for offsite compensation, on a one to one ratio or other ratio approved by CDFG and USFWS as required.

5. CULTURAL RESOURCES. Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Adverse change in historical and archaeological resources. Less than significant with mitigation incorporated. Excavation as proposed at each site could affect unknown subsurface resources. See Mitigation Measure 1 below.

Destroy a unique paleontological resource: Less than significant with mitigation incorporated. Excavation as proposed at each site could affect unknown subsurface resources. See Mitigation Measure 2 below.

Disturb human remains: Less than significant with mitigation incorporated. Excavation as proposed at each site could affect unknown human remains. See Mitigation Measure 1 below.

Mitigation Measures for Cultural Resources: The following mitigation measures are proposed to offset potentially significant impacts to cultural resources, and will reduce the potential effects of the proposed project on the above-described resources to less-than-significant levels:

APM-CULT-1: Should previously unidentified archeological resources (e.g., metal, glass, ceramic refuse, privies, wells, etc.) or human remains be encountered during construction, work within the immediate vicinity of the find will stop until such time that a qualified archaeologist can evaluate the find and make appropriate recommendations for mitigation, if warranted. If the find includes bones or any other human remains, the County Coroner will immediately be notified. At the same time a qualified archaeologist should be contacted to evaluate the discovery. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 48 hours of this identification.

APM-CULT-2: In the event that previously unidentified fossil remains are encountered during project construction, a qualified paleontological specialist will be contacted. Construction within the immediate vicinity of the find will be temporarily halted or diverted until a qualified vertebrate paleontologist examines the discovery. If the find is potentially significant, the paleontologist will contact the appropriate agencies or educational institutions to determine procedures for salvage and disposition of the fossils that should be followed before construction is allowed to resume at the location of the find.

APM-CULT-3: If human remains of Native American origin are found, the Coroner must notify the Native American Heritage Commission within 48 hours of this identification.

Mitigation Measure 1: Resources inadvertently discovered

Should previously unidentified archeological resources (e.g., metal, glass, ceramic refuse, privies, wells, etc.) or human remains be encountered during construction, work within the immediate vicinity of the find will stop until such time that a qualified archaeologist can evaluate the find and make appropriate recommendations for mitigation, if warranted. If the find includes bones or any other human remains, the County Coroner will immediately be notified. At the same time a qualified archaeologist should be contacted to evaluate the discovery. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 48 hours of this identification.

Mitigation Measure 2: Paleontological resources

In the event that previously unidentified fossil remains are encountered during project construction, a qualified paleontological specialist will be contacted. Construction within the immediate vicinity of the find will be temporarily halted or diverted until a qualified vertebrate paleontologist examines the discovery. If the find is potentially significant, the paleontologist will contact the appropriate agencies or educational institutions to determine procedures that should be followed before construction is allowed to resume at the location of the find, and procedures for salvage and disposition of the fossils.

6. GEOLOGY and SOILS. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i) Rupture of a known earthquake fault, as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines & Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternate wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Fault rupture. No impact. Implementation of the proposed project will not expose persons to impacts involving fault rupture. The proposed project would not involve construction of any habitable structures, and therefore would not increase risks of loss, injury, or death associated with fault rupture hazards.

Seismic ground shaking. No impact. The project would not involve construction of any habitable structures, and therefore would not increase risks of loss, injury, or death associated with ground shaking hazards.

Seismic ground failure, including liquefaction. No impact. Activities associated with the pipeline excavation are not expected to increase risks of loss, injury, or death due to the potential for liquefaction.

Landslides or mudflows. No impact. No existing landslide or mudflow features have been mapped or identified in the vicinity of the proposed project. None of the activities associated the pipeline excavation are expected to contribute to increased risks of loss, injury, or death due to potential for landslides or mudflows.

Erosion or loss of topsoil. No Impact. The proposed project will only involve the excavation of

small areas around the pipeline for inspection and possibly repair, which will be backfilled with excavated native soil. Implementation of erosion control and revegetation BMPs will minimize the erosion hazard at the site. These BMPs are described in the project Mitigation Monitoring and Reporting Plan (MMRP) and Storm Water Pollution Prevention Plan (SWPPP).

Liquefaction or subsidence of the land. No impact. The project will not involve construction of any habitable structures or other facilities, and therefore would not increase risks associated with land subsidence.

Expansive soils. No impact. The proposed pipeline excavation will not be affected by expansive soils.

Septic tanks and wastewater disposal. No impact. There are no septic tank or wastewater facilities or services required as part of this project.

7. GREENHOUSE GAS EMISSIONS -- Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Generate greenhouse emissions. Less than significant. Potential short-term impacts from the Project may result from construction activities. As described in Section 2.16 Transportation and Circulation below, construction of the project will only require approximately three or four vehicles accessing the work sites via public streets and roads on a daily basis for one week at each site. The Project will result in minor air emissions from minimal construction vehicle emissions. These activities are already part of the maintenance and operation of the existing gas pipelines. Therefore, operation emissions would not be expected to cause or contribute to an air quality violation. Since the Project will result in only limited air emissions during construction, no impact will occur and subsequently, no mitigation is required. However PG&E is committed to the application of GHG reduction Avoidance and Protection Measures to facilities, including this Project.

Conflict with an applicable plan, policy or regulation. Less than significant. The proposed project will not result in new stationary sources of emissions, so no standards will be violated. Because the potential for exhaust GHG emissions from construction vehicles is expected to fall below the GHG impact thresholds, no emission modeling was conducted. The short-term increase in GHG emissions during construction activities would be imperceptible when compared to the ARB's estimated 2020 emission limit of 427 million metric tons CO₂e. Therefore, construction GHG emissions will not interfere with ARB's long-term goal to reduce GHG emissions to 1990 levels by 2020. Further, as discussed below, PG&E is committed to apply GHG reduction measures for all facilities. Therefore, as discussed below, PG&E's incorporation of avoidance and protection measures into Project design will further ensure that GHG emission impacts are less than significant.

Avoidance and Protection Measures

PG&E has incorporated additional Avoidance and Protection Measures (APMs) into the Project description to minimize the Project's Greenhouse Gas air emissions. All PG&E standard practices are also considered avoidance measures and are considered part of the Project. To further reduce GHG emissions from Project construction (specifically CO₂); the following measures will be implemented:

APM-GHG-1: Encourage the use of bio-diesel fuel for diesel-powered equipment and vehicles.

APM-GHG-2: Encourage construction workers to carpool.

APM-GHG-3: Encourage the recycling of construction waste.

APM-GHG4: Idling of construction vehicles will be kept to the minimum required to perform the work. Unnecessary engine idling will be discouraged.

The Project's contribution to cumulative GHG emissions will be less than significant.

8. HAZARDS and HAZARDOUS MATERIALS. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Transport, use or disposal of hazardous materials. No impact. The only potentially hazardous materials are common vehicle and equipment fuels and lubricants. Standard precautions will be taken to ensure any vehicle service or fueling in the project work area will not result in a spill.

Upset and accident conditions. No impact. There is no apparent potential for accident and upset conditions that would be associated with the proposed pipeline excavation.

Hazardous emissions or acutely hazardous materials within ¼ mile of a school. No impact. The project does not have the potential for hazardous emissions and is not within ¼ mile of a school.

Be located on a hazardous material site. No impact. There are no hazardous material sites within a mile of the project sites.

Projects located within an airport land use plan or within the vicinity of a private airstrip. No impact. The existing gas pipeline is below ground so the proposed excavation will not affect navigable air space or people residing or working in the vicinity of the airport.

Emergency response plan. No impact. The project will not interfere with any adopted emergency plan.

Wildland fires: No impact. The project area is annual grass lands that are used for grazing. While these grasslands would be subject to wildfires, PG&E vehicles and construction equipment include fire suppression equipment, so the project will not likely result in a wildfire or expose people or structures to potential wildfire impacts.

9. HYDROLOGY and WATER QUALITY. Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Otherwise substantially degrade water quality? | | | | <input checked="" type="checkbox"/> |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | | | | <input checked="" type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

HYDROLOGY and WATER QUALITY (cont.).

Would the project:

- j) [expose people or structures to] Inundation by seiche, tsunami, or mudflow?

Violate water quality standards. Less than significant impact with mitigation. Wetland impacts are also discussed in Section 4 (above).

At Site 1, a seasonal wetland and a vernal pool feature are present.

The Site 1 seasonal wetland depression that is over the pipeline anomaly is 0.017 ac. in size, as reported in the USFWS Biological Opinion (BO) dated Nov. 2, 2009, (USFWS File no. 84120-2009-F-0782-1) all of which will be impacted during the inline inspection and repair work. Temporary impacts to this wetland would occur due to project activities. These impacts will be mitigated through site restoration following pipe inspection and/or repair.

The Site 1 vernal pool feature is located approximately 15 feet east of the pipeline anomaly and is 100 feet long by 50 feet wide or 5000 square feet (0.107 ac). This area will be avoided and will not be impacted by the in line inspection and repair work.

At Site 3, an alkali swale is crossed by the access road. A temporary crossing would create temporary impacts of 0.030 ac. to this site (as reported in the USFWS B.O.). Temporary impacts to this site will be minimized by placement of approved crossing structures. No damage to the site is expected, so no remedial work is expected to be needed after removal of the crossing structures. All excavation at Site 3 will occur in uplands several hundred feet from the swale.

The temporary surface disturbance associated with the project will not result in net loss of wetland area or functions through compliance with the proposed mitigation measures. Because no permanent impacts to wetlands or other waters are expected, and because the temporal impacts would primarily be those associated with habitat concerns, the compensatory mitigation requirements specified by USFWS shall be considered adequate to address wetland mitigation needs for this project.

Mitigation Measures for Hydrology and Water Quality: The following mitigation measures proposed above for mitigation of project effects to Biological Resources are also proposed to offset potentially significant impacts to Hydrology and Water Quality, and will reduce the potential effects of the proposed project on the above-described resources to less-than-significant levels:

APM-BIO-1: PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio as detailed below. PG&E shall provide the U.S. Fish and Wildlife Service (USFWS) and the State Water Board with proof of compensation at least twenty (20) work days prior to ground breaking.

USFWS has estimated that all California red-legged frogs inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one

compensation ratio.

Per the Biological Opinion issued for the project, USFWS has estimated that all longhorn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp inhabiting 0.3 acre of seasonal wetlands will be subject to incidental take as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio.

USFWS has estimated that all California Tiger Salamander inhabiting 0.5 acre of suitable habitat will be subject to incidental take in the form of harm, harassment, capture, injury and death as a result of the project. PG&E will compensate for effects to listed amphibians and vernal pool crustaceans from disturbance of grassland and wetland habitat, with a minimum three to one compensation ratio.

APM-BIO-2: PG&E will implement all minimization measures described in USFWS January 26, 1999, *Programmatic Formal Endangered Species Act Consultation on the Issuance of Permits under Section 404 of the Clean Water Act or Authorization under the Nationwide Permit Program for Projects that May Affect the California Red-legged Frog (*Rana aurora draytonii*)* (Programmatic Consultation).

APM-BIO-3: PG&E will submit the names and credentials of biologists who are proposed to perform preconstruction surveys and monitoring to USFWS for written approval at least 15 days prior to the commencement of any activities. A USFWS-approved biologist will survey the work sites two weeks before the onset of activities. If California red-legged frogs, tadpoles, or eggs or any life stage of California tiger salamander are found, the approved biologist will contact the USFWS to determine if moving any of these life-stages is appropriate. In making this determination USFWS shall consider if an appropriate relocation site exists. If USFWS approves moving animals, the approved biologist shall be allowed sufficient time to move California red-legged frogs and/or California tiger salamander from the sites before work activities begin. Only USFWS-approved biologists will participate in activities associated with the capture, handling, and monitoring of these species. If a California red-legged frog and/or California tiger salamander is found nearby, but outside a site, it will not be disturbed and USFWS will be notified. The biologist will also report any observations of vernal pool fairy shrimp, long horn fairy shrimp, vernal pool tadpole shrimp, and San Joaquin kit fox.

APM-BIO-4: Before any construction activities begin on the project, a USFWS-approved biologist will conduct a training session for all construction personnel. The training will include a description of the listed species with the potential to occur, their habitat, and the general measures that are being implemented to conserve the species as they relate to the project and the boundaries within which the project may be accomplished (i.e. sites).

APM-BIO-5: A USFWS-approved biologist will be present on the work site until all minimization and avoidance measures have been completed. After this time, a biological monitor, who has been trained per Conservation Measure 3 of the Biological Opinion, will remain on site during all construction activities, and will have the authority to halt any work activity that might result in impacts that exceed the levels anticipated by the Corps, USFWS, and the CDFG during review of the proposed action. If work is stopped, the Corps, USFWS, and CDFG will be notified immediately by the USFWS-approved biologist or on-site monitor.

APM-BIO-6: During project activities, all trash, including that which may attract predators, will be properly contained, removed from the sites, and disposed of on a daily basis. Following

construction, all trash and construction debris from sites will be removed.

APM-BIO-7: All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 66 feet from any riparian habitat or water body. PG&E will ensure contamination of habitat does not occur during such operations. Prior to the start of construction, PG&E will prepare a plan to ensure a prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

APM-BIO-8: A USFWS- and State Water Board approved biologist will ensure that the spread or introduction of invasive plant species will be avoided to the maximum extent possible. When practical, invasive exotic plants in the project area will be removed.

APM-BIO-9: Project areas that are disturbed will be revegetated with an appropriate wetland or upland vegetation native seed mix. Appropriate mulch or other surface protection will be applied as needed. For all areas to be excavated topsoil will be stripped, stockpiled separately, and replaced at the end of the backfilling process. Impermeable clay layers in the vicinity of vernal pools, if encountered, should be stockpiled separately and replaced to avoid or minimize potential indirect effects to the hydrology of local vernal pool complexes.

APM-BIO-10: The number of access routes, number and size of staging areas, and the total area of the activity will be limited to the minimum necessary to achieve the project goal. Routes and boundaries will be clearly demarcated, and these areas will be outside of riparian and wetland areas to the extent feasible. For the work in Site 3 where a seasonal wetland cannot be avoided, the 50 x 50 foot area will be delineated by fencing to limit impacts to adjacent wetland habitat. Restoration will be performed where impacts occur in staging areas and access routes.

APM-BIO-11: Work activities will be completed between April 1 and November 1. Should the proponent or applicant demonstrate a need to conduct activities outside this period, the Corps may authorize such activities after obtaining USFWS approval.

APM-BIO-12: PG&E will implement best management practices (BMPs) to control erosion during and after project implementation.

APM-BIO-13: A USFWS-approved biologist will permanently remove any individuals of exotic species, such as bullfrogs, crayfish, and centrarchid fishes from within the project area to the maximum extent possible.

APM-BIO-16: Project-related vehicles should observe a 20 mph speed limit in all project areas, except on county roads and State and Federal highways, particularly at night when San Joaquin kit foxes are most active. To the extent possible, nighttime construction should be minimized. Off-road traffic outside of designated project areas is prohibited.

APM-BIO-17: To prevent inadvertent entrapment of San Joaquin kit foxes, California red-legged frogs or California Tiger salamanders during the construction phase of the project, all excavated, steep-walled holes or trenches more than 2 feet deep should be covered at the

close of each working day by plywood or similar materials, or one or more escape ramps constructed of earth fill or wooden planks will be provided. Before such holes or trenches are filled, they should be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, USFWS and CDFG will be notified immediately.

APM-BIO-18: San Joaquin kit foxes, California red-legged frogs, or California tiger salamanders are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of 4-inches or greater that are stored at a construction site for one or more overnight periods should be thoroughly inspected for these species before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a San Joaquin kit fox is discovered inside a pipe, that section of pipe should not be moved until USFWS has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.

APM-BIO-19: To prevent harassment, mortality, or destruction of dens of San Joaquin kit foxes, California red-legged frog and/or California tiger salamander, no dogs, cats, or other pets shall be permitted on project sites.

APM-BIO-20: Steel plates or other equivalent protective measures as approved by the State Water Board, CDFG, and USFWS will be installed across the alkali swale which is crossed by the access route to Site 3, to avoid disturbance to the seasonal wetland and swale at that site.

APM-BIO-21: All excavated material shall be stored in the designated work areas.

APM-BIO-22: Erosion control matting containing plastic mono-filament netting or similar material containing netting shall not be used at the project site because California red-legged frogs, California tiger salamanders, and San Joaquin kit foxes may become entangled or trapped in it. Acceptable substitutes include coconut coir matting, tackified hydroseeding compounds, or other materials as approved by USFWS and the State Water Board.

APM-BIO-23: All construction activity shall be confined within the Gas Line 303 ILI Repair Project site, which includes temporary access routes and work areas specifically designated and marked for these purposes. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site without authorization from USFWS and the State Water Board.

APM-BIO-24: The Gas Line 303 ILI Repair Project construction area shall be delineated with high visibility temporary fencing at least (4) feet in height, flagging, or other barriers to prevent encroachment of construction personnel and equipment onto any sensitive areas during project work activities. Such fencing shall be inspected and maintained daily until completion of the project. The fencing will be removed only when all construction equipment is removed from the site. Actions within the project area shall be limited to vehicle and equipment operation on existing roads, and designated access routes. No project activities will occur outside the delineated project construction area.

APM-BIO-25: Silt fencing will be used as needed in conjunction with the high visibility fencing to prevent soil and debris from entering sensitive areas. Such fencing shall be inspected and maintained daily until completion of the project. The fencing will be removed only when all construction equipment is removed from the site.

APM-BIO-26: Twenty-four (24) hours prior to any ground disturbance, pre-construction surveys shall be conducted for San Joaquin kit foxes, California tiger salamanders, California red-legged frogs, vernal pool crustaceans, and sensitive plants. These surveys will consist of walking surveys of the project limits and adjacent areas accessible to the public to determine presence of the species.

APM-BIO-27: The project area shall be re-inspected by the monitoring biologist whenever a lapse in construction activity of two weeks or greater has occurred.

APM-BIO-28: Excavations shall be inspected in the morning before construction work starts to ensure that animals have not fallen in the trench or hold.

APM-BIO-29: Only a USFWS- approved biologist will be allowed to trap or capture California tiger salamanders and/or California red-legged frogs.

APM-BIO-30: If requested, during or upon completion of construction activities, the on-site biologist, and/or representative from PG&E shall accompany State Water Board, USFWS, CDFG, and/or Corps personnel on an on site inspection of the site to review project effects on the San Joaquin kit fox, California red-legged frog, California tiger salamander, and/or vernal pool crustaceans and their habitats.

APM-BIO-31: The State Water Board shall ensure that PG&E complies with the Reporting Requirements of this biological opinion.

APM-BIO-32: PG&E shall make the terms and conditions of the biological opinion a required term in all contracts for the project that are issued by them to all contractors.

APM-BIO-33: PG&E shall provide the Resident Engineer or their designee with a copy of the biological opinion, and the Resident Engineer or their designee shall be responsible for implementing the conservation measures and Terms and Conditions of the biological opinion and shall be the point of contact for the project. The Resident Engineer or their designee shall maintain a copy of the biological opinion on-site whenever construction is taking place.

APM-BIO-34: The name and full contact information of the Resident Engineer shall be provided to the State Water Board and USFWS at least thirty (30) calendar days prior to groundbreaking at the project. Prior to ground breaking, the Resident Engineer must submit a letter to the State Water Boards and USFWS verifying that they possess a copy of the biological opinion and have read the Terms and Conditions.

APM-BIO-35: The PG&E on-site monitor shall have oversight over implementation of all the Terms and Conditions of the biological opinion, and shall have the authority to stop project activities, through communication with the Resident Engineer, if any of the requirements associated with these Terms and Conditions are not being fulfilled. If the biologist/construction liaison has requested a stop work due to take of any of the listed species, the USFWS and CDFG will be notified within one (1) working day via email or telephone.

Substantially deplete Groundwater. No impact. The project will not utilize ground water or affect groundwater supplies.

Substantially alter the existing drainage pattern and create erosion or siltation. No impact. The project will temporary remove vegetation in small areas and will be revegetated at the end of the project. The excavation areas are very small and will not substantially alter the

existing drainage pattern. Erosion and sediment control measures will also be implemented to minimize the risk of run-off.

Substantially alter the existing drainage pattern and create flooding. No impact. The minor excavation that will be performed as part of the project should not result in flooding and will not substantially alter the existing drainage pattern.

Create or contribute to runoff water. No impact. The project will not impact any streams or change the volume of surface runoff.

Substantially degrade water quality. No impact. No degradation is likely to occur as a result of project activity.

Place housing within the 100-year flood zone. No Impact. No housing or other structures will be constructed by the project.

Place structures within the 100-year flood zone. No Impact. No housing or other structures will be constructed by the project.

Expose people or structures to loss. No Impact. No housing or other structures will be constructed by the project. No structures or habitable dwellings exist in the immediate proximity of the project area.

Inundation by a seiche, tsunami or mudflow. No impact. The project area, due to its geographical location, is not susceptible to potential impacts from dam failure or inundation by a seiche, tsunami or mudflow.

10. LAND USE AND PLANNING. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Divide a community. No impact. The Project does not entail any land use change or division and would affect any community.

Conflict with local land use regulations or policies. No impact. The proposed project will not affect the continued use of the land for agricultural use and would not conflict with any land use regulations or policies. Additionally, the California Public Utilities Commission has confirmed that local jurisdictions acting pursuant to local authority are preempted from regulating electric and natural gas projects constructed by public utilities subject to Commission jurisdiction.

Conflict with a conservation plan. No impact. The proposed project will not affect any conservation areas or plans.

11. MINERAL RESOURCES. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Loss of a known resource of future value to the State. No impact. The proposed excavation and backfill at Site 2 will not affect the sandstone formation to the south.

Loss of a locally important resource. No impact. The proposed excavation and backfill at Site 2 will not affect the sandstone formation to the south.

12. NOISE. Would the project result in:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing in or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing in or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Noise level in excess of local ordinances. No impact. There are no sensitive receptors near the sites. No permanent noise or sounds will be emitted as part of the project. Local noise

levels and limitations will not be exceeded.

Permanent increase in noise levels. No impact. There are no permanent sound emitting sources as part of the project. The construction noise is temporary, approximately one week at each site. The proposed project will not produce any noise after construction.

Temporary increase in ambient noise levels. No impact. While a temporary increase in noise will occur during construction of the project, there are no sensitive receptors near any of the sites. Additionally the project sites are located approximately 50 feet from the roads and the temporary construction noise levels for less than a week will not significantly change noise levels above existing traffic levels.

Project within airport land use. No Impact. There is not an airport within 1000 feet of the project sites.

Project within vicinity of private airstrip. No Impact. There is not a private airstrip within 1000 feet of the project sites.

13. POPULATION AND HOUSING. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Induce substantial population growth. No impact. The purpose of the proposed project is to excavate, inspect and, if necessary, repair an existing natural gas pipeline which will have no effect on local population growth.

Displace a substantial number of housing or people. No impact. The proposed project will not displace or otherwise affect any people or housing.

14. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

- | | | | | |
|-----------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Fire, Police Protection, Schools, Parks, and other public facilities. No Impact. The proposed project will not require any public services so there will be no impact

15. RECREATION. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Increase the use of recreational facilities. No impact. The proposed project will not result in any population increase nor will it change the recreational habits of local residents.

Require the construction of new recreational facilities. No impact. The proposed project will not result in the need for additional or expanded recreational facilities.

16. TRANSPORTATION / TRAFFIC. Would the project:

- a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e) Result in inadequate emergency access?
- f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Exceed the capacity of the existing circulation system. No impact. Construction of the project will only require approximately three or four vehicles accessing the work sites via public streets and roads on a daily basis for one week at each site.

Conflict with an applicable congestion management program. No impact. The three or four vehicles a day for a week at a site will not impact the level of service in the area or conflict with the congestion management program.

Result in a change in air traffic patterns. No Impact. The project will not have any impact on air traffic patterns or safety risks.

Increase design hazards or incompatible uses. No impact. The proposed project will not modify any existing roads so potential hazards will not be created. All construction vehicles are either street-legal and capable of normal speed and maneuverability or will be trailered to the sites.

Inadequate emergency access. No impact. The proposed project will not require the closure

of any roads or otherwise potentially impede emergency access routes.

Conflict with adopted polices, plans for alternative transportation. No impact. The project will only require approximately three or four vehicles accessing the three work sites via public streets and roads on a daily basis for a one-week duration at each site. The project will not conflict with adopted plans for alternative transportation.

17. UTILITIES AND SERVICE SYSTEMS. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Exceed wastewater treatment requirements. No impact. The project does not require any wastewater treatment services.

Require or result in the construction of new water or wastewater treatment. No impact. The project does not require any water or wastewater treatment services.

Require or result in the construction of new storm water drainage facilities. No impact. The project does not require any storm water drainage services.

Result in a determination by wastewater treatment services. No impact. The project does not require any wastewater treatment services and will not require a determination from a

wastewater treatment service.

Be served by a landfill with sufficient permitted capacity. No impact. The project does not require any landfill services.

18. MANDATORY FINDINGS OF SIGNIFICANCE.

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)
- c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?
- d) **Less than significant with mitigation.** Seven federal and/or state listed threatened or endangered species are either known to occur or presence has been assumed in the project area. These species or their habitats are potentially subject to project-related impacts. The Service has determined in its biological opinion that the proposed Gas Line 303 ILI Repair Project is not likely to jeopardize the continued existence of the California red-legged frog, California tiger salamander, San Joaquin kit fox, long horn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp current status. Although designated critical habitat for vernal pool fairy shrimp and proposed critical habitat for the California red-legged frog will be affected, none will be destroyed or adversely modified by the project²⁵. In the Biological Opinion issued by the Service, conservation measures, terms, and conditions for reasonable and prudent measures were included (and are detailed in the biological resources Section II.4 above) which would mitigate the potential impacts to the species to least than significant.

²⁵ USFWS Biological Opinion for the PG&E Gas Line 303ILI Repair Project (Corps File #2009-00143S) dated November 2, 2009

Three jurisdictional wetlands features are present in the Line 303 in line inspection project area.

At Site 1, a seasonal wetland and a vernal pool feature are present.

The Site 1 seasonal wetland depression that is over the pipeline anomaly is 0.017 ac. in size, as reported in the USFWS Biological Opinion (BO) dated Nov. 2, 2009, (USFWS File no. 84120-2009-F-0782-1) all of which will be impacted during the inline inspection and repair work. Temporary impacts to this wetland would occur due to project activities. These impacts will be mitigated through site restoration following pipe inspection and/or repair.

The Site 1 vernal pool feature is located approximately 15 feet east of the pipeline anomaly and is 100 feet long by 50 feet wide or 5000 square feet (0.107 ac). This area will be avoided and will not be impacted by the in line inspection and repair work.

At Site 3, an alkali swale is crossed by the access road. A temporary crossing would create temporary impacts of 0.030 ac. to this site (as reported in the USFWS B.O.). Temporary impacts to this site will be minimized by placement of approved crossing structures. No damage to the site is expected, so no remedial work is expected to be needed after removal of the crossing structures. All excavation at Site 3 will occur in uplands several hundred feet from the swale.

The temporary surface disturbance associated with the project will not result in net loss of wetland area or functions through compliance with the proposed mitigation measures. Because no permanent impacts to wetlands or other waters are expected, and because the temporal impacts would primarily be those associated with habitat concerns, the compensatory mitigation requirements specified by USFWS shall be considered adequate to address wetland mitigation needs for this project.

- e) **No Impact.** The proposed Line 303 In Line Inspection Project will not have a cumulative significant impact on the environment. The direct examination of the line is necessary to insure the safety and reliability of the pipeline. The examination of the pipeline does not generate any other activity or impact nor is it related to any development project.
- f) **No Impact.** The proposed Line 303 In Line Inspection Project will not cause substantial adverse effects on human beings, either directly or indirectly. The location of the proposed Line 303 In Line Inspection Project is grassland that is annually grazed and only represents a small portion of the thousands of acres of land that is grazed around the three sites. There are no urbanized or residential areas within 1/4 mile of the Project.

Prepared By:
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Division of Water Quality, State Water Resources Control Board

Reviewed by:

Date

Date

(Form updated 7/28/09)

Authority: Public Resources Code Sections 21083, 21084, 21084.1, and 21087.

Reference: Public Resources Code Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.1 through 21083.3, 21083.6 through 21083.9, 21084.1, 21093, 21094, 21151; *Sundstrom v. County of Mendocino*, 202 Cal. App. 3d 296 (1988); *Leonoff v. Monterey Board of Supervisors*, 222 Cal. App. 3d 1337 (1990).

Information Sources:

APPENDIX F: MITIGATION MONITORING AND REPORTING PLAN

[APP. F ATTACHED AS SEPARATE PDF FILE]