Exhibit 1-A
Topock Compressor Station Groundwater Remediation Project
Final Environmental Impact Report

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
4.1 Aesthetics			
Impact AES-1: Views from Topock Maze Locus B toward the floodplain, Colorado River and "Needles" rock formation, a Scenic Vista (represented by key view 5) could be adversely affected by the proposed project through removal of floodplain vegetation, introduction of reagent storage tanks and control building, grading operations, and overall alteration of the foreground elements of a scenic vista. (FEIR, Volume 2, pp. 4.1-47 - 4.1-48.)	**Mitigation Measure AES-1:** The proposed project shall be designed and implemented to adhere to the design criteria presented below. ► Existing mature plant specimens shall be protected in place during construction, operation, and decommissioning phases. The identification of plant specimens that are determined to be mature and retained shall occur as part of the design phase and mapped/identified by a qualified plant ecologist or biologist and integrated into the final design and project implementation. ► Revegetation of disturbed areas within the riparian vegetation along the Colorado River shall occur concurrently with construction operations. Plans and specifications for revegetation shall be developed by a qualified plant ecologist or biologist before any riparian vegetation is disturbed. The revegetation plan shall include specification of maintenance and monitoring requirements, which shall be implemented for a period of 5 years after project construction or after the vegetation has successfully established, as determined by a	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Once constructed, the proposed project would result in a substantial change to the existing character of the floodplain from key view 5 (Topock Maze Locus B toward the floodplain, Colorado River and "Needles" rock formation, a Scenic Vista) because of the introduction of wells, reagent storage tanks and control building, removal of existing mature vegetation, and the proposed in situ reactive zone along National Trails Highway. Grading would be required for the purpose of constructing the proposed project, but would not result in substantially altering landforms. The proposed project would be a dominant foreground feature, but would not be viewed on a constant basis. Pedestrian viewers are considered to be highly sensitive to change in existing visual character because of their distance, angle, duration, and

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	qualified plant ecologist or biologist. ► Plant material shall be consistent with surrounding native vegetation. ► The color of the wells, pipelines, reagent storage tanks, control structures, and utilities shall consist of muted, earth-tone colors that are consistent with the surrounding natural color palette. Matte finishes shall be used to prevent reflectivity along the view corridor. Integral color concrete should be used in place of standard gray concrete. ► The final revegetation plans and specifications shall be reviewed and approved by an architect, landscape architect, or allied design professional licensed in the State of California to ensure that the design objectives and criteria are being met. Planting associated with biological mitigation may contribute to, but may not fully satisfy, visual mitigation.		expectation of views. Visitors to the site would experience long-duration foreground views of the proposed project but the proposed structures would not obstruct the middle-ground views of the Needles rock formation. Implementation of the proposed project would introduce a strong degree of contrast to the existing visual character of the floodplain. Implementation of Mitigation Measure AES-1 would reduce the overall change to the visual character of the view corridor along the Colorado River. Although the proposed project would still be visible, incorporating a facilities design that is aesthetically sensitive and preserving the vegetation would blend the proposed project into their visual setting within the floodplain and would reduce the overall contrast of the proposed project to a less-than-significant level. (FEIR, Volume 2, pp. 4.1-47 - 4.1-48; see also FEIR, Volume 2, pp. 4.1-34, 4.1-36 [Exhibit 4.1-19], 4.1-37, and see also Errata attached as Exhibit 1 to the Resolution Certifying the FEIR.)
Impact AES-2: Views from the Colorado River, a scenic resources corridor (represented by key view 11) could be adversely affected by the proposed project through removal of floodplain vegetation, grading operations, and overall alteration of a scenic view corridor. (FEIR,	**Mitigation Measure AES-2:** The proposed project shall be designed and implemented to adhere to the design criteria presented below. ► A minimum setback requirement of 20 feet from the water (ordinary high water mark) shall be enforced, except with regard to any required river intake facilities, to prevent substantial vegetation removal along the riverbank. ► Existing mature plant specimens shall be	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Once constructed, the proposed project would result in a considerable change to the existing character of the floodplain by introducing as many as 170

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
Volume 2, pp. 4.1-48 - 4.1-50.)	protected in place during construction, operation, and decommissioning phases. The identification of plant specimens that are determined to be mature and retained shall occur as part of the design phase and mapped/identified by a qualified plant ecologist or biologist and integrated into the final design and project implementation. ► Revegetation of disturbed areas within the riparian vegetation along the Colorado River shall occur concurrently with construction operations. Plans and specifications for revegetation shall be developed by a qualified plant ecologist or biologist before any riparian vegetation is disturbed. The revegetation plan shall include specification of maintenance and monitoring requirements, which shall be implemented for a period of 5 years after project construction or after the vegetation has successfully established, as determined by a qualified plant ecologist or biologist. ► Plant material shall be consistent with surrounding native vegetation. ► The color of the wells, pipelines, and utilities shall consist of muted, earth-tone colors that are consistent with the surrounding natural color palette. Matte finishes shall be used to prevent reflectivity along the view corridor. Integral color concrete should be used in place of standard gray concrete. ► The final revegetation plans and specifications shall be reviewed and approved by an architect,		new wells and related infrastructure in the project area. Additionally, the removal of large portions of existing vegetation could substantially affect the existing character of views from the Colorado River, including providing new views to vehicular traffic along National Trails Highway. The proposed project would not be viewed on a constant basis; however, these changes would be apparent to recreational viewers on the Colorado River and would become a noticeable foreground feature. Recreational viewers are considered to have a relatively high sensitivity to visual change because of their distance, angle, duration, and expectation of views. Boaters nearby would experience short-duration foreground views of project features that are located within the floodplain, including potential freshwater intake structures. Implementation of Mitigation Measure AES-2 would reduce the overall change to the visual character of the view corridor along the Colorado River. Although the proposed project would still be visible, incorporating a facilities design that is aesthetically sensitive and preserving the vegetation would blend the proposed project into their visual setting within the floodplain and would reduce the overall contrast of the proposed project to a less-than-significant level. (FEIR, Volume 2, pp. 4.1-48 - 4.1-50; see also FEIR, Volume 2, pp. 4.1-42, 4.1-43 [Exhibit 4.1-23] and 4.1-44.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	landscape architect, or allied design professional licensed in the State of California to ensure that the design objectives and criteria are being met. Planting associated with biological mitigation may contribute to, but may not fully satisfy, visual mitigation.		
Impact AES-3: The visual quality and character along the Colorado River could be altered through the removal of floodplain vegetation and grading operations (key view 11). (FEIR, Volume 2, p. 4.1-50.)	**Mitigation Measure AES-3:** Mitigation Measure AES-1 shall be implemented. Implementation of Mitigation Measures AES-1 would reduce the overall change to the visual character of the view corridor along the Colorado River. Although the proposed project would still be visible, incorporating a facilities design that is aesthetically sensitive and preserving the vegetation would blend the proposed project into their visual setting within the floodplain and would reduce the overall contrast of the proposed project	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Mitigation Measure AES-1 shall be implemented. Implementation of Mitigation Measures AES-1 would reduce the overall change to the visual character of the view corridor along the Colorado River. Although the proposed project would still be visible, incorporating a facilities design that is aesthetically sensitive and preserving the vegetation would blend the proposed project into their visual setting within the floodplain and would reduce the overall contrast of the proposed project to a less-than-significant level. (FEIR, Volume 2, p. 4.1-50.)
4.2 Air Quality			
Impact AIR-1: Construction of the proposed project would result in emissions that do not exceed MDAQMD's thresholds for ROG, NO_X , and $PM_{2.5}$, but that do exceed	**Mitigation Measure AIR-1:** PG&E shall implement the fugitive dust control measures below for any construction and/or demolition activities: ► Use periodic watering for short-term stabilization of disturbed surface area to minimize visible fugitive dust emissions during	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** As shown in

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
MDAQMD's threshold of significance for PM_{10} (82 lb/day). (FEIR, Volume 2, pp. 4.2-26 - 4.2-29.)	dust episodes. Use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes shall be considered sufficient; ► Cover loaded haul vehicles while operating on publicly maintained paved surfaces; ► Stabilize (using soil binders or establish vegetative cover) graded site surfaces upon completion of grading when subsequent development is delayed or expected to be delayed more than 30 days, except when such delay is caused by precipitation that dampens the disturbed surface sufficiently to eliminate visible fugitive dust emissions; ► Cleanup project-related track out or spills on publicly maintained paved surfaces within twenty-four hours; and ► Curtail nonessential earth-moving activity under high wind conditions (greater than 25 miles per hour) or develop a plan to control dust during high wind conditions. For purposes of this rule, a reduction in earth-moving activity when visible dusting occurs from moist and dry surfaces due to wind erosion shall be considered sufficient to maintain compliance.		Table 4.2-6, construction-related activities during 2010–2014 would not generate daily unmitigated ROG, NOX, or PM2.5 emissions that exceed the applicable MDAQMD threshold of 137, 137, or 82 lb/day, respectively. Mitigation Measure AIR-1 would be anticipated to reduce fugitive dust (PM10) emissions by a minimum of 75%. Thus, postmitigation, PM10 emissions would be substantially reduced to below MDAQMD's threshold of 82 lb/day. The significance of compliance with required fugitive dust controls after mitigation is less than significant on the air quality of the project area. (FEIR, Volume 2, pp. 4.2-26 - 4.2-29.)
4.3 Biological Resources			
Impact BIO-1: Implementation of the proposed project could result in fill of wetlands and other	**Mitigation Measure BIO-1:** Areas of sensitive habitat in the project area have been identified during project surveys. These areas include floodplain and riparian areas, wetlands, and waters of the United States. Habitats designated by DFG as	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
waters of the United States under U.S. Army Corps of Engineers (USACE) and California Department of Fish and Game (DFG) jurisdiction, as well as potential disturbance or removal of riparian vegetation along the Colorado River. (FEIR, Volume 2, pp. 4.3-25 - 4.3-27.)	sensitive, including desert washes and desert riparian, are also included. To the extent feasible, elements of the project shall be designed to avoid direct effects on these sensitive areas. During the design process and before ground disturbing activities, a qualified biologist shall coordinate with PG&E to ensure that the footprints of construction zones, drill pads, staging areas, and access routes are designed to avoid disturbance of sensitive habitats to the extent feasible. DTSC shall be responsible for enforcing compliance with design and all preconstruction measures. If during the design process it is shown that complete avoidance of habitats under USACE jurisdiction is not feasible, the Section 404 permitting process shall be completed, or the substantive equivalent per CERCLA Section 121(e)(1). In either event, the acreage of affected jurisdictional habitat shall be replaced and/or rehabilitated to ensure "no-net-loss." Before any ground-disturbing project activities begin in areas that contain potentially jurisdictional wetlands, the wetland delineation findings shall be documented in a detailed report and submitted to USACE for verification as part of the formal Section 404 wetland delineation process and to DTSC. For all jurisdictional areas that cannot be avoided as described above, authorization for fill of wetlands and alteration of waters of the United States shall be secured from USACE through the Section 404 permitting process before project implementation. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by		identified in the FEIR. **Facts in Support of Finding:** Developing and following avoidance and minimization measures for unavoidable impacts to identified sensitive habitats to assure, at a minimum, not net loss, as well as obtaining appropriate permits from appropriate agencies and implementing permit conditions would reduce impacts on sensitive habitats to a less-than-significant level. (FEIR, Volume 2, pp. 4.3-25 - 4.3-27.)

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	feasible methods agreeable to USACE and consistent with applicable county and agency policies and codes. Minimization and compensation measures adopted through any applicable permitting processes shall be implemented. Alternately, if USACE declines to assert jurisdiction because it determines that CERCLA Section 121(e)(1) applies, the substantive equivalent of the Section 404 permitting process shall be complied with by ensuring that the acreage of jurisdictional wetland affected is be replaced on a "no-net-loss" basis in accordance with the substantive provisions of USACE regulations. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by feasible methods consistent with USACE methods, and consistent with the purpose and intent of applicable county and agency policies and codes. Minimization and compensation measures adopted through any applicable permitting processes shall be implemented. In any event, a report shall be submitted to DTSC to document compliance with these mandates. If during the design process it is shown that complete avoidance of habitats under DFG jurisdiction (such as changes to the natural flow and/or bed and bank of a waterway) is infeasible, a Section 1602 streambed alteration agreement shall be obtained from DFG and affected habitats shall be replaced and/or rehabilitated. If complete avoidance of identified riparian habitat is not feasible, the acreage of riparian habitat that would be removed shall be replaced or rehabilitated on a no-net-loss basis in accordance with DFG regulations and, if		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	applicable, as specified in the streambed alteration agreement, if needed. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods agreeable to DFG and consistent with the purpose and intent of applicable county policies and codes, as well as those policies outlined under the respective federal agency guidance documents. Minimization and compensation measures adopted through the permitting process shall also be implemented. Restoration of any disturbed areas shall include measures to achieve "no-net-loss" of habitat functions and values existing before project implementation. These measures shall be achieved by developing and implementing a habitat restoration plan submitted to DFG, U.S. Bureau of Land Management (BLM), and U.S. Fish and Wildlife Service (USFWS) that is agreeable to these agencies, or, alternately, through the implementation of a habitat restoration plan consistent with the substantive policies of DFG, BLM, and USFWS. The plan shall include a revegetation seed mix or plantings design, a site grading concept plan, success criteria for restoration, a monitoring plan for achieving no net loss of habitat values and functions, and an adaptive management plan. Alternately, if DFG declines to assert jurisdiction because it determines that CERCLA Section 121(e)(1) applies, and during the design process it is shown that complete avoidance of habitats under DFG jurisdiction (such as changes to the natural flow and/or bed and bank of a waterway) is infeasible, the substantive mandates of a streambed alteration agreement shall be implemented, and		

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	affected habitats shall be replaced and/or rehabilitated. If complete avoidance of identified riparian habitat is not feasible, the acreage of riparian habitat that would be removed shall be replaced or rehabilitated on a "no-net-loss" basis in accordance with DFG regulations and, if applicable. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods agreeable to DFG and consistent with the purpose and intent of applicable county policies and codes, as well as those policies outlined under the respective federal agency guidance documents. Minimization and compensation measures adopted through the permitting process shall also be implemented. Restoration of any disturbed areas shall include measures to achieve "no-net-loss" of habitat functions and values existing before project implementation. These measures shall be achieved by developing and implementing a habitat restoration plan developed consistent with the substantive policies of DFG, BLM and USFWS. The plan shall include a revegetation seed mix or plantings design, a site grading concept plan, success criteria for restoration, a monitoring plan for achieving no net loss of habitat values and functions, and an adaptive management plan.		
Impact BIO-2a (Disturbance of Special-Status Birds and Loss of Habitat): Implementation of the proposed project could affect avian and terrestrial species, specifically special-status	**Mitigation Measure BIO-2a:** To the extent feasible, the project implementation plans shall be designed to minimize removal of habitat for special-status birds. During the design process and before ground disturbing activities, a qualified biologist shall coordinate with PG&E to ensure that the footprints of project elements and	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Conducting preconstruction surveys for special-status birds

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
birds and desert tortoise, either directly or through habitat modifications. (FEIR, Volume 2, pp. 4.3-27 - 4.3-29.)	construction zones, staging areas, and access routes are designed to avoid direct or indirect effects on habitat and nesting habitat for other special-status species, to the extent feasible. DTSC will ensure compliance with all preconstruction and construction phase avoidance measures identified during this process and included in any design plans. Vegetation removal and other activities shall be timed to avoid the nesting season for special-status bird species that may be present. The nesting cycle for most birds in this region spans March 15 through September 30. **Preconstruction Measures** Preconstruction breeding season surveys shall be conducted during the general nesting period, which encompasses the period from March 15 through September 30, if the final design of the project could result in disturbance or loss of active nests of special-status bird species. If vegetation removal or other disturbance related to project implementation is required during the nesting season, focused surveys for active nests of special-status birds shall be conducted before such activities begin. A qualified biologist shall conduct preconstruction surveys to identify active nests that could be affected. The appropriate area to be surveyed and the timing of the survey may vary depending on the activity and species that could be affected. For the Yuma clapper rail, the preconstruction surveys shall specifically identify habitat within 300 feet of construction areas, in accordance with substantive policies of USFWS.		and nesting birds, developing and following avoidance and minimization measures, and establishing buffers or construction outside the nesting cycle would reduce the impact on nesting special-status birds to a less-than-significant level. (FEIR, Volume 2, pp. 4.3-27 - 4.3-29.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	Construction Measures Before the initiation of project elements that could result in disturbance of active nests or nesting pairs of other special-status birds, a qualified biologist shall be consulted to identify appropriate measures to minimize adverse impacts during the construction phase of the project. If deemed appropriate for the final project design because of the potential for impacts, minimization measures will include focusing construction activities that must be conducted during the nesting season to less-sensitive periods in the nesting cycle, implementing buffers around active nests of special-status birds to the extent practical and feasible to limit visual and noise disturbance, conducting worker awareness training, and conducting biological monitoring (including noise monitoring to determine if construction noise at the edge of suitable nesting habitat is elevated above 60 dBA L_{eq} or ambient levels). An avoidance and minimization plan for special status bird species, as defined in Table 4.3-3 and those species protected under the federal Migratory Bird Treaty Act, including the Yuma clapper rail, shall be developed and implemented in consultation with USFWS, and agreed upon by DTSC. Avoidance and impact minimization measures, such as prohibiting construction near or in sensitive bird habitat, limiting construction during breeding seasons, and requiring an on-site biological monitor, shall be included in the design plan and implemented to the extent necessary to avoid		

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	significant impacts on sensitive bird species.		
Impact BIO-2b (Disturbance of Desert Tortoise and Loss of Habitat): Implementation of the proposed project could affect avian and terrestrial species, including the desert tortoise, either directly or through habitat modifications. (FEIR, Volume 2, pp. 4.3-27 - 4.3-30.)	**Mitigation Measure BIO-2b:** ***Preconstruction Measures*** In areas where impacts to potential desert tortoise habitat are unavoidable, measures outlined in the Programmatic Biological Agreement (PBA) and in the USFWS letter concurring with the PBA, shall be implemented, as described below. To the extent feasible, project construction shall be designed to minimize removal of habitat for the desert tortoise. Before any ground-disturbing project activities begin, a USFWS-authorized desert tortoise biologist shall identify potential desert tortoise habitat in areas that could be affected by the final project design. Through coordination with the authorized biologist, PG&E shall ensure that the footprints of project elements and construction zones, staging areas, and access routes are designed to avoid direct or indirect effects on potential desert tortoise habitat to the extent feasible. These measures include the presence of a USFWS-authorized desert tortoise biologist on-site who will examine work areas and vehicles for the presence of desert tortoises, and who will conduct preconstruction desert tortoise surveys in areas where unavoidable impacts to tortoise habitat would occur. If feasible, the preconstruction desert tortoise surveys would coincide with one of the two peak periods of desert tortoise activity (i.e., if feasible, the surveys should be conducted in either the period from April through May, or from September through October). The preconstruction surveys shall be in full accordance with the substantive requirements of USFWS	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Conducting preconstruction surveys for desert tortoises, developing and following avoidance and minimization measures, and implementing the desert tortoise provisions of the PBA, would reduce the impact on the species to a less-than-significant level. (FEIR, Volume 2, pp. 4.3-27 - 4.3-30.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	protocols. ***Construction Measures*** Before the initiation of project elements that could result in disturbance of desert tortoises or desert tortoise habitat, a USFWS-authorized desert tortoise biologist shall be consulted to identify appropriate measures to minimize adverse impacts. Minimization measures are likely to include micro-siting structures, pipelines, and access roads in previously disturbed areas or in areas with sparse scrub vegetation, conducting worker awareness training, and conducting biological monitoring.		
Impact BIO-2c (Disturbance of Special-Status Species and Loss of Habitat Caused by Decommissioning): Implementation of the proposed project could affect avian and terrestrial species, specifically special-status birds and desert tortoise, either directly or through habitat modifications. (FEIR, Volume 2, pp. 4.3-27 - 4.3-31.)	**Mitigation Measure BIO-2c:** To avoid impacts on special-status species that may occur within the project area as a result of decommissioning activities, an avoidance and minimization plan shall be developed and implemented through consultation with DFG, BLM, and USFWS. These measures shall be based on surveys conducted prior to decommissioning, and during the breeding season (as previously defined in this EIR for each species or suite of species). Restoration of any disturbed areas shall include measures to achieve no net loss of habitat functions and values existing before project implementation. These measures shall be achieved by developing and implementing a habitat restoration plan submitted to DFG, BLM, and USFWS that is agreeable to these agencies. The plan shall include a revegetation seed mix or plantings design, a site grading concept plan, success criteria for restoration, a monitoring plan for achieving no net loss of habitat values and	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Achieving no net loss of habitat values through a restoration plan and restoration implementation, consulting with the appropriate agencies, developing and following avoidance and minimization measures, and/or obtaining appropriate permits from agencies and implementing permit conditions would reduce the impact on biological resources to a less-than-significant level. (FEIR, Volume 2, pp. 4.3-27 - 4.3-31.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	functions, and an adaptive management plan.		
Impact BIO-3a (Potential Impacts to Aquatic Habitat Related to Turbidity, Erosion, Sedimentation, and Overall Water Quality during Construction of the Intake Structure): If selected as part of the final remedy, construction of the freshwater intake structure element of the proposed project could prevent fish from accessing spawning habitat or interfere with preferred habitat. In addition, operation of the water intake structure within the Colorado River could cause mortality to fish, including special-status species. Increased sedimentation and turbidity, the release of contaminants, and standing during construction activities could also adversely affect fish habitat and movement in the Colorado River. (FEIR, Volume 2, pp. 4.3-31 - 4.3-34.)	**Mitigation Measure BIO-3a:** Hydrology & Water Quality Mitigation Measure HYDRO-1 shall be implemented in order to reduce water quality impacts related to erosion and pollutant runoff through implementation of Best Management Practices (BMPs). In addition, installing the cofferdam and dewatering a portion of the proposed intake structure site during fish screen construction may result in fish stranding. PG&E and its contractor shall coordinate with a qualified fisheries biologist to develop and implement a fish rescue plan. The fish rescue effort would be implemented during the dewatering of the area behind the cofferdam and would involve capturing those fish and returning them to suitable habitat within the river. The fish rescue plan shall identify and describe the following items: collection permits needed, fish capture zones, staffing, staging areas, fish collection and transport methods, species prioritization, resource agency contacts, fish handling protocols, fish relocation zones, site layout and progression of dewatering and fish rescue, and records and data. To ensure compliance, a fisheries biologist shall be present on-site during initial pumping (dewatering) activities and to oversee the fish rescue operation.	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Implementation of Mitigation Measure BIO-3a would minimize impacts on water quality by controlling potential pollutants, including sediment, and runoff discharges from the project site. Consequently, any impacts associated with pollutants resulting from alterations of drainage and water quality would be reduced to a less-than-significant level. In addition, the proper implementation of a fish rescue plan would prevent substantial fish mortality, which would reduce this impact to a less-than-significant level. (FEIR, Volume 2, pp. 4.3-31 - 4.3-34.)
Impact BIO-3b (Potential Loss or Degradation of	**Mitigation Measure BIO-3b:** To restore, replace, or rehabilitate habitat impacted by the intake	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
Aquatic Habitat): If selected as part of the final remedy, construction of the freshwater intake structure element of the proposed project could prevent fish from accessing spawning habitat or interfere with preferred habitat. In addition, operation of the water intake structure within the Colorado River could cause mortality to fish, including special-status species. Increased sedimentation and turbidity, the release of contaminants, and standing during construction activities could also adversely affect fish habitat and movement in the Colorado River. (FEIR, Volume 2, pp. 4.3-31 - 4.3-35.)	structure, PG&E shall implement the measures described below. Unless as provided below, PG&E shall confer with DFG regarding potential disturbance to fish habitat and shall obtain a streambed alteration agreement, pursuant to Section 1602 of the California Fish and Game Code, for construction work associated with intake structure construction; PG&E shall also confer with DFG pursuant to the California Endangered Species Act (CESA) regarding potential impacts related to the loss of habitat or other operational impacts on state-listed fish species, respectively. PG&E shall comply with all requirements of the streambed alteration agreement and any CESA permits to protect fish or fish habitat or to restore, replace, or rehabilitate any important habitat on a "no-net-loss" basis. Alternatively, if DFG declines to assert jurisdiction because it determines that CERCLA Section 121(e)(1) applies, the project proponent shall consult with DFG regarding potential disturbance to fish habitat and shall meet the substantive policies of a streambed alteration agreement and of the CESA for construction work associated with intake structure construction and operations. PG&E shall comply with all substantive requirements of the streambed alteration agreement and CESA to protect fish and fish habitat or to restore, replace, or rehabilitate any important habitat on a "no-net-loss" basis and to operate the facility in accordance with CESA to ensure no net loss of habitat function. Additionally, PG&E shall consult with USACE regarding the need to obtain permits under section 404 of the CWA and section 10 of the Rivers and		incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Implementation of Mitigation Measure BIO-3b would minimize adverse effects associated with entrainment and impingement, most specifically to fish eggs and larvae, by ensuring that the positive barrier fish screen is properly designed and operating effectively and efficiently. Impacts would be less than significant with mitigation. (FEIR, Volume 2, pp. 4.3-31 - 4.3-35.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	Harbors Act. In conjunction with these permitting activities, the USACE must initiate consultation with USFWS under Section 7 of the Federal ESA regarding potential impacts of the proposed project on federally listed fish species due to the loss of habitat on federally listed fish species. PG&E shall implement any additional measures developed through the ESA Section 7 processes, or its equivalent, to ensure "no-net-loss" of habitat function. Alternatively, if USACE and/or USFWS decline to assert jurisdiction because it determines that CERCLA Section 121(e)(1) applies, PG&E shall confer with USFWS regarding potential disturbance to federally listed fish species and federally listed fish species habitat and shall meet the substantive mandates under Section 7 of the Federal ESA regarding potential impacts to fish or to habitat of federally listed fish species. PG&E shall implement any additional measures developed through that processes, including compliance with the substantive requirements of all of what would be permit conditions if not exempt pursuant to CERCLA, and to ensure "no-net-loss" of habitat function. Because the type and extent of habitat potentially affected is unknown, PG&E shall have an instream, habitat typing survey conducted in the area potentially affected by the intake construction. Further, cooperation with USFWS and other fisheries biologists shall determine suitable and acceptable location(s) for the intake structure(s) to avoid the spawning habitat of special-status fish		

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	species. PG&E shall avoid habitat modifications, especially to habitat that is preferred by native fishes for spawning or rearing including side channels, cobble or gravel bars, and shallow backwaters. If these habitat types cannot be avoided, any disturbed habitat will be restored or replaced to achieve "no-net-loss" of habitat types and values as described above.		
Impact BIO-3c (Potential Fish Entrainment and Impingement during Operation of the Intake Structure): If selected as part of the final remedy, construction of the freshwater intake structure element of the proposed project could prevent fish from accessing spawning habitat or interfere with preferred habitat. In addition, operation of the water intake structure within the Colorado River could cause mortality to fish, including special-status species. Increased sedimentation and turbidity, the release of contaminants, and standing during construction activities could also adversely affect fish habitat and movement in the Colorado River. (FEIR, Volume 2, pp. 4.3-31 - 4.3-	**Mitigation Measure BIO-3c:** Both screened and unscreened diversions can entrain larval life stages of fish. For example, adverse effects to early life stages of fish could occur if diversions coincide with planktonic larval life stages that occur during summer months, a period of high entrainment vulnerability. Prior to operation of the intake structure, PG&E shall consult with USFWS and DFG to determine the most vulnerable time of the year for entrainment or impingement of razorback sucker and bonytail chub eggs or larvae. PG&E shall install a state-of-the-art positive-barrier fish screen that would minimize fish entrainment and impingement at the intake structure. The fish screen shall be designed in accordance with DFG and the National Marine Fisheries Service criteria, with specific consideration given to minimizing harm to fish eggs and other early life stages. To ensure that the fish screen operates as intended and reduce the risk of impacts, long-term monitoring of the operations and maintenance of the positive-barrier screen shall be conducted. Monitoring at the onset of diversions through the intake shall include approach velocity measurements immediately after the positive-barrier screen	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Implementation of Mitigation Measure BIO-3c would minimize adverse effects associated with entrainment and impingement, most specifically to fish eggs and larvae, by ensuring that the positive barrier fish screen is properly designed and operating effectively and efficiently. Impacts would be less than significant with mitigation. (FEIR, Volume 2, pp. 4.3-31 - 4.3-35.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
35.)	operations begin, with fine-tuning of velocity control baffles or other modifications as necessary, to achieve uniform velocities in conformance with the screen criteria established by regulatory agencies.		
4.4 Cultural Resources			
Impact CUL-1a (During Design, Construction, O&M, and Decommissioning Implement Measures to Avoid, Minimize, or Mitigate Impacts on Cultural Resources): Cause Substantial Adverse Change in the Significance of a Historical Resource as Defined in CEQA Guidelines Section 15064.5. Construction, operation and maintenance, and decommissioning activities of the proposed project could result in substantial adverse changes to historical resources in the project area, including the (1) Topock Cultural Area, (2) other historical resources listed in Table 4.4-3, and (3) historical resources that could be identified during construction. Impacts could occur through ground disturbance and other project-	**Mitigation Measure CUL-1a:** ***During Design, Construction, O&M, and Decommissioning Implement Measures to Avoid, Minimize, or Mitigate Impacts on Cultural Resources.*** Establishment of a cultural impact mitigation program and a Corrective Measures Implementation Workplan (CMI Workplan), with specific activities stipulated for each phase of the project, will reduce the potential for impacts on historical resources within the project area, and will help preserve the values of and access to the Topock Cultural Area for local tribal users. As detailed below, measures will be implemented to avoid known resources, re-use existing disturbed areas to the extent feasible and consistent with the Final Remedy, allow for tribal input to the final design and maintain access for tribal users during design, construction, operation, and decommissioning activities, as appropriate. During construction, a Worker Education Program and regular archaeological and tribal monitoring will be implemented, and measures intended to reduce the potential for incursion by outside parties will be strengthened.	Significant and Unavoidable	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the Project that substantially lessen this impact's significant effects on the environment. Even with the implementation of the Mitigation Measure CUL-1a-1 through 13, the proposed project retains the potential to result in significant impacts on the Topock Cultural Area. Therefore, the proposed project's impacts to the Topock Cultural Area are considered significant and unavoidable. DTSC further finds that complete avoidance of direct and indirect effects of the project to the Topock Cultural Area and the physical characteristics that convey its historical significance is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. DTSC further notes that the proposed project completely avoids direct effects to the NRHP- listed and NRHP- and CRHR-eligible site CA-SBR-219 (including Loci A, B, and C, of the Topock Maze), such that no direct physical impacts would occur in those areas (although, in noting this fact, DTSC concurs with the Final EIR's conclusion with

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
related activities or through the introduction of out-of character visual or auditory intrusions to historical resources that gain their significance in part because historical associations or aesthetic values. This impact would be potentially significant. (FEIR, Volume 2, pp. 4.4-60 - 4.4-68.)	***Mitigation during the design, construction, O&M, and decommissioning phases includes these specific actions:*** **CUL-1a-1:** During development of the final design and the construction, operation, and decommissioning phases of the project, PG&E shall carry out and require all subcontractors to carry out all investigative, testing, and remediation activities, including all supporting operations and maintenance activities, in ways that avoid, minimize, and mitigate significant adverse effects to historically significant cultural and historic resources, consistent with the CEQA Guidelines, and including the Topock Cultural Area, to the maximum extent feasible as determined by DTSC. **CUL-1a-2:** As part of the CMI Workplan, PG&E shall develop a written access plan to preserve tribal members' access to, and use of, the project area for religious, spiritual, or other cultural purposes. This plan will allow access to the extent PG&E has the authority to facilitate such access, and be consistent with existing laws, regulations, and		respect to the significance of this impact). In addition, changes or alterations are within the responsibility of another public agency, BLM, which can and should consider increasing security/law-enforcement resources, posting signs, and/or otherwise taking measures to oversee and prevent trespassing on Federal lands with the Topock Cultural Area. **Overriding Considerations:** The environmental, economic, social and other benefits of the project override the significant adverse impact of the project associated with the proposed project's impact to the Topock Cultural Area, as more fully stated in the Statement of Overriding Considerations. **Finding of Fact for Analysis Methodology as to the EIR's Cultural Resources Analysis:** 195 prehistoric and historic resources were documented within the 1,924-acre area subject to cultural resources surveys conducted by PG&E, with approximately 80 of these resources located within the proposed project area (see Table 4.4-3 to FEIR). A formal determination of eligibility for inclusion in the CRHR has not been performed for most of the individual prehistoric and historic-era sites within the project area. However, several resources have been evaluated and

[1] "Interested Tribes" means, for purposes of the EIR and the mitigation measures contained herein, the six tribes that have substantially participated in the various administrative processes surrounding remediation of the site with DTSC, PG&E, and DOI, including throughout development of the final remedy. Interested tribes include the Chemehuevi Indian Tribe, Cocopah Indian Tribe, Colorado River Indian Tribes, Fort Mojave Indian Tribe, Fort Yuma-Quechan Indian Tribe, and Hualapai Indian Tribe.

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	agreements governing property within the project area. The access plan may place restrictions on access into certain areas, such as the Compressor Station and the existing evaporation ponds, subject to DTSC review with regard to health and safety concerns and to ensure noninterference with approved remediation activities. This access plan may be developed in coordination with the federal agencies with land management responsibilities in the project area (e.g., BLM and USFWS) in accordance with the related stipulation (General Principle I.C) contained in the Programmatic Agreement (Appendix PA). PG&E shall demonstrate a good faith effort to coordinate with Interested Tribes[1] by including communication logs as part of the CMI Workplan. **CUL-1a-3:** PG&E shall enhance existing measures to prevent and reduce incursions from recreational and/or other outside users from affecting unique archeological and historically significant resources, including resources within the Topock Cultural Area, by: a. Retaining a Qualified Cultural Resource Consultant to implement the Mitigation Monitoring and Reporting Program (MMRP) and conducting yearly inspections (or		recommended or determined eligible for listing on the NRHP, and thus are historical resources for the purposes of CEQA. Thus, documented sites analyzed for this project fall into two main categories: those sites that have been determined eligible for inclusion in the NRHP (which makes them historical resources subject to CEQA) and those sites for which a determination of eligibility has not yet been made. NRHP-eligible and listed sites within or immediately adjacent to the project area include CA-SBR-219 (Topock Maze Loci A–C, which is adjacent to the project footprint), historic-era resources such as CA-SBR-2910H (Historic Route 66 and portions of the National Old Trails Road), CA-SBR-6693H (Atlantic and Pacific Railroad Company rail line, which is adjacent to the planned project activities), and CA-SBR-11701, which consists of numerous lithic artifacts, stone tools, and features such as an aboriginal trail. In addition to the cultural resources recorded by these previous surveys, DTSC has determined, based on the weight of the evidence, that the area surrounding the Topock Maze, appears to qualify as a historical resource under CEQA as an area that is significant in the social and cultural annals of California. This section explains DTSC's determination that the Topock Cultural Area is a historical resource for purposes of impact evaluation under CEQA.

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	less frequently upon approval by DTSC) of identified historical resources, including inspections of the Topock Cultural Area, to determine if substantial adverse changes have occurred relative to the condition of the historical resources during the past year or prior to the implementation of the proposed project. PG&E shall offer to retain a tribal monitor at historic rates of compensation or tribal representatives designated by the Tribal Council or chairperson, if so requested, to accompany the Qualified Cultural Resources Consultant during the inspections. The Qualified Cultural Resource Consultant shall be a person who is acceptable to DTSC and who is also a qualified archaeologist with a graduate degree in archaeology, anthropology or closely related field, plus at least 3 years of full-time professional experience in general North American archaeological research and fieldwork, with expertise/experience in the Southwest preferred. b. Developing a site security plan as part of the CMI Workplan. The site security plan shall include, but		A discretionary historical resource is a resource that does not fit within the mandatory or presumptive categories, but that is determined to be a historical resource in the exercise of the lead agency's discretion. Under CEQA case law, a lead agency evaluating potential project impacts under CEQA has broad discretion to determine whether a particular resource that may be affected by a proposed project is a historical resource for purposes of CEQA, provided the lead agency determination is supported by substantial evidence. When such a determination is made, the criteria to be applied include the criteria for listing on the CRHR. Therefore, DTSC has looked beyond the specific cultural resources recorded by previous archaeological surveys, and has determined, based on the weight of the evidence, that the Topock Maze and the surrounding area within the project area appears to qualify as a historical resource under CEQA as an area that is significant in the social and cultural annals of California. The historical resource consisting of the project area depicted in Exhibit 3-2 and the Topock Maze is referred to in this EIR as the "Topock Cultural Area." In making its discretionary determination under CEQA, DTSC has carefully weighed the evidence, including (1) the testimony of Native American tribal representatives received during the confidential NACP tribal consultation process, (2) the ethnographic and historical

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	not be limited to, instructions for PG&E personnel to inspect the project site routinely during construction and report any human-caused disturbance to project facilities and the surrounding environment to DTSC and the appropriate landowner, such as BLM, USFWS, or FMIT, as appropriate, depending on the ownership of the property involved in the incursion. Notification shall be within a specified period, as established in the site security plan for the event, and shall also be summarized as part of the periodic implementation status report, as approved by DTSC for remedy implementation. This measure does not impose any obligation on PG&E to perform law-enforcement duties on federal or private lands, but is intended to provide increased observation of potential intrusions into the project area during construction and operation of the final remedy that may impact significant cultural resources. PG&E staff, or assigned agents, should be instructed to report any outside disturbance to the environment personally observed over the course of the		literature and the archaeological record, and (3) California and federal regulations and guidelines. DTSC has also consulted the federal government's guidance regarding TCPs provided in National Register Bulletin 38 (NPS 1998). The Topock Cultural Area is of cultural significance to several different Native American tribes as described above. In accordance with federal guidelines, the significance of a TCP is derived from the "role the property plays in a community's historically rooted beliefs, customs, and practices" (NPS 1998:1). The consultations during the NACP process identified various aspects of the significance of the Topock Cultural Area. For example, the Fort Mojave Indian Tribe indicated that the Topock area has symbolic value akin to the Arlington National Cemetery. Acknowledged representatives of this tribe stated during the EIR process that the Topock area is critical to tribal cultural beliefs, especially those beliefs related to the afterlife. They also stated that conducting cultural practices, including religious practices, within the Topock area is very important to the continuation of tribal traditions. The Fort Mojave Indian Tribe attributes high cultural value to the entire area in which the project is located, and to areas beyond the defined project area, including the constituent parts of that area (landforms, water, plants, and animals),

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	working day. Information shall be reported within a specific period, as established in the site security plan, to DTSC and the appropriate landowners, such as BLM, USFWS, or FMIT, depending on the ownership of the property intruded upon. The site security plan may also include the use of PG&E security cameras at major ingress/egress gates into the project site. Finally, if requested by the FMIT the plan may include the use of private security personnel to patrol the FMIT-owned parcel within the project area to prevent outside incursions. c. Coordinating with BLM and San Bernardino County to facilitate an outreach effort to the staff at Moabi Regional Park, requesting that they communicate to visitors the parts of the project area that are off limits to off-road vehicle usage because of health and safety concerns, public lands management plans, or landowner requests. PG&E shall make a good faith effort to involve the surrounding tribes in this outreach effort, providing Interested Tribes with the opportunity to comment on outreach materials or provide a tribal cultural resources specialist		It is not necessary to make any findings with respect to historical resources under CEQA beyond the area that may be affected by the proposed project (that area being the Topock Cultural Area as defined in this EIR). This is because CEQA defines "environment" as the physical conditions which exist within the area that will be affected by a proposed project (Public Resources Code, §21060.5). The geographic scope of the area identified within the EIR has been determined to be broad enough for this purpose and extending such analysis to a broader area would require speculation. Any ground-disturbing activity or impact to the plants, wildlife, visual characteristics, or setting of the Topock Cultural Area is considered by the Fort Mojave Indian Tribe to be a desecration of their religious and cultural beliefs. These kinds of impacts are experienced as a loss and sorrow akin to the passing of a loved one or family member. As noted above in Section 4.4.1.3 of the FEIR, other Colorado River tribes, including the Hualapai, Cocopah, and Fort Yuma-Quechan, also expressed strong cultural concerns for Topock, and the Colorado River Indian Tribes indicated that some tribal members have cultural concerns for the Topock area. Although the Topock Cultural Area has sustained some damage, the cultural significance ascribed to the resource by these Native American tribes appears to demonstrate that the Topock Cultural Area generally has sufficient

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	the opportunity to participate in the outreach activities. As part of this outreach effort, PG&E shall work with Park Moabi and offer to design, develop, and fund the installation of an informational kiosk within Park Moabi that informs visitors of the work being done at the project site. PG&E shall involve the tribes to the maximum extent feasible, as determined by DTSC, in the design and development of the informational kiosk. d. Posting signage to indicate those parts of the project area that are off limits to off-road vehicle usage due to possible health and safety concerns and to reduce potential damage to environmental resources. If agreed to by land owners and/or local, state, or federal management entities within the project area, PG&E shall work with the relevant land owner or land management entity to develop, design, and fund the installation of easily visible and clear signage. This may include coordination with BLM to install signage noting the designation of the area as an Area of Critical Environmental Concern owing to its biological and cultural		integrity of relationship and condition to these communities. Tribal representatives have repeatedly stated that, despite existing impacts from highway, railroad, pipeline, and recreational developments, the resource continues to be important in their culture. Based upon the Native American testimony it appears that the Topock Cultural Area can still function for traditional cultural purposes despite the modern intrusions. Certain tribes have repeatedly stated that the cultural significance of the Topock Cultural Area goes beyond the bounds of the Maze itself. For example, the Fort Mojave Indian Tribe stated, "the cultural landscape within which the artifacts are located…has the deepest importance to the tribe," (FMIT 2009a). This tribe also stated that the Topock Cultural Area includes the entire project area. Native American representatives have stated that the Topock Cultural Area is tied in with the larger regional landscape that includes the Colorado River corridor and that within that larger landscape, the Topock Cultural Area has distinctive importance because of the traditional cultural values at Topock itself. However, it is beyond the scope of this EIR to define whether there may be an additional historical resource area for purposes of the CRHR or the NRHP beyond the project boundaries, or to address areas that are not affected by the proposed project. A lead agency's evaluation under CEQA as to whether there is a discretionary historical resource on a project site is not a

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	resources, while ensuring that signs are placed in a way that does not draw unwanted attention to specific resources. **CUL-1a-4:** PG&E shall work with representative members of the Interested Tribes to convene and retain a multidisciplinary panel of independent scientific and engineering experts as part of a Technical Review Committee (TRC). The TRC shall be made up of not more than five multidisciplinary experts who will be on call to review project-related documents, participate in project-related meetings, and advise interested tribal members on technical matters relating to the final design and remedy. The TRC shall include only persons with technical expertise, including but not limited to geology, hydrology, water quality, engineering, paleontology, toxicology, chemistry, biology, or botany. Before July 1, 2011, PG&E shall post an open grant or Request for Qualifications (RFQ) and retain members of the TRC at rates comparable to those paid historically to tribal experts by PG&E for the remediation project. TRC members shall be selected by majority vote of one representative from each participating Interested Tribe. PG&E shall provide Interested Tribes at least 30-days notice of the meeting to select		formal eligibility determination for the CRHR or NRHP, and CEQA does not require a formal eligibility determination. As such, in compliance with CEQA, DTSC has only referenced the federal TCP guidelines in weighing the balance of the evidence in order to determine if the proposed project would adversely impact the physical characteristics of the Topock Cultural Area that convey its historical significance as a historical resource under CEQA. DTSC has not attempted to evaluate whether the Topock Cultural Area as defined in this EIR would be determined to be a TCP by the federal government. Following completion of the DEIR, BLM released a Programmatic Agreement addressing its obligations under Section 106 of the NHPA. That document states that BLM has determined a TCP exists within the Area of Potential Effects of the project and that the TCP is eligible for the NRHP. BLM consulted with SHPOs in California and Arizona regarding this determination in accordance with regulations implementing NHPA Section 106. In addition, BLM acknowledged that the TCP is part of a larger area of traditional and cultural importance to Native American tribes. Finally, contrary to comments received on the DEIR, the preparation of an ethnographic study was never part of a mitigation measure required by DTSC, but instead was an activity resulting from National Historic Preservation Act Section 106 consultation between PG&E, various tribes, Federal land management agencies, and State Historic Preservation Officers; DTSC was not

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	TRC members and to review TRC candidate qualifications. For the purposes of contracting, the grant may be awarded to one tribal government to manage or, alternatively, PG&E may reimburse the tribe or TRC members directly. The entirety of the monies shall be used to fund the scientific and engineering team exclusively, and shall not be used to fund other tribal government expenses or used to support legal counsel. A stipulation of the open grant shall be that the scientific and engineering team shall provide all deliverables and results to all involved tribes, despite a possible contract agreement with only one tribe or with PG&E. Upon conclusion of the construction phase of the project, the necessity and dollar value of the TRC shall be assessed by PG&E and, with the approval of DTSC, shall either be extended, reduced, or terminated under the operations and maintenance phase. An annual activity report shall be sent to DTSC for review and to ensure PG&E is in compliance. **CUL-1a-5:** Should any indigenous plants of traditional cultural significance and listed in Appendix PLA of this FEIR be identified within the project area, PG&E shall avoid, protect, and encourage the natural regeneration of the identified plants when developing		party to these consultations and was not a signatory to this agreement. The information in the EIR is not meant to replace or otherwise subsume any requirements included in the IM-3 memorandum of understanding prepared and signed by the Federal Government or any other agreement made between parties outside of DTSC's jurisdiction. Although records indicate that the director of the CRIT tribal museum did request funds from PG&E to prepare an ethnographic study. PG&E ultimately decided not to fund the preparation of an ethnographic study. Under CEQA, DTSC had no requirement or authority to dictate that PG&E fund and complete an ethnographic study as part of the EIR environmental assessment process. Although there is a settlement agreement between FMIT and PG&E which is dated November 9, 2006, enforcement of a settlement agreement may be made by a party to the agreement or through a breach of contract action but these issues have no substances in relation to DTSC's required environmental assessment and review process. DTSC utilized an independent information gathering process through direct contact with interested tribes. As a result, mitigation measures imposed as part of the DEIR are included herein as part of the mitigation monitoring and reporting program (MMRP) with the corresponding timing and responsible party/agency identified. Noncompliance with a mitigation measure is also enforceable by filing a petition for writ of mandate. (FEIR, Volume 1, pp. 3-107 – 3-108.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	the remediation design, final restoration plan, and IM-3 decommission plan. In the event that impacts on the identified plants cannot be avoided and such plants will be displaced, PG&E shall retain a qualified botanist who shall prepare a plant transplantation/monitoring plan which can be included as part of the Cultural Impact Mitigation Program (CIMP) referenced in CUL-1a-8 either by (1) transplanting such indigenous plants to an on-site location, or (2) providing a 2:1 ratio replacement to another location decided upon between PG&E and members of the Interested Tribes. Plans to transplant or replace such plants shall be approved by DTSC. In coordination with the qualified botanist, PG&E shall monitor all replanted and replacement plants for at least 5 years, and shall ensure at least a 75 percent survivorship during that time. This mitigation measure is not meant to replace or subsume any actions required by state or federal entities with regard to the protection of species listed as rare, threatened, or endangered. **CUL-1a-6:** All additional phone calls and alarms associated with remediation activities or facilities shall not be routed through PG&E's existing alarm system utilized at the compressor station. The		Nevertheless, DTSC has contacted interested tribes and welcomed any ethnographic information to be presented for the purpose of the EIR preparation and cultural resources evaluation as part of this EIR process. As stated in Section 4.4.2.2 of the DEIR, a lead agency may determine a site to be historically significant in the cultural annals of California, provided the determination is supported by substantial evidence in light of the whole record. Archival and ethnohistoric information gathered with respect to this project support DTSC's determination that the project area is of religious and spiritual significance to some of the Native American tribes. Although DTSC cannot settle the dispute of spiritual significance of a particular area between tribal beliefs, DTSC's goal is to avoid or minimize disturbance to the surrounding landscape and environment to the extent possible during remediation of contamination regardless of the confirmation or absence of spiritual significance attributed to the project area. (FEIR, Volume 1, pp. 3-107 – 3-109.) **Facts in Support of Finding:** The proposed project would have a substantial adverse impact on the Topock Cultural Area, which is considered a historical resource because of its historic (and continuing) importance to representatives of the Fort Mojave Indian Tribe and certain other Yuman-speaking tribes in the lower Colorado River region. The area in which ground-disturbing activities and facilities would be located has been designed to avoid the

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	notification system for remediation-related alerts and/or phone calls shall not introduce additional noise to the project area, to the maximum extent feasible, provided there is ongoing compliance with applicable safety regulations or standards of the Federal Energy Regulatory Commission, Occupational Safety and Health Administration, and other agencies. (See Mitigation Measure NOISE-3 for additional mitigation related to the Topock Cultural Area). **CUL-1a-7:** Nighttime construction-related activities shall be limited to work that cannot be disrupted or suspended until the following day, such as, but not limited to, well drilling and development or decommissioning activities. Lighting considerations, including the potential use of solar power for some lighting, shall be included as part of the remedial design plan to be developed with involvement of Interested Tribes and the U.S. Department of the Interior. To minimize construction and operations-related lighting impacts, the lighting in the remedial design plan shall include, at a minimum: (1) shrouding/shielding for portable lights needed during construction and operational activities; (2) installation of portable lights at the lowest allowable height and in the		NRHP- listed and NRHP- and CRHR-eligible site CA-SBR-219 (Loci A, B, and C, of the Topock Maze), which is an integral part of the Topock Cultural Area, such that no direct physical impacts would occur in these areas. However, because of the introduction of additional infrastructure, ground-disturbing activity, and overall nature of modern intrusions associated with the proposed project, the changes to the character, nature, and use of the historical resource the proposed project would indirectly affect the Topock Maze environment. Such activities would also directly and indirectly adversely affect the Topock Cultural Area as described within this EIR. As discussed further in Section 4.9 of the FEIR, "Noise," for example, the construction of new modern features such as wells and water pipelines would be inconsistent with the setting and auditory characteristics of the Topock Cultural Area that contribute to its historical significance to certain Native American tribes and could be deemed a material alteration of the physical characteristics of the historical area. As expressed by Native American stakeholders during the NACP, numerous project-related and project-induced activities would materially affect the cultural significance of the Topock Cultural Area and affect cultural practices associated with that area. These include: ► Construction of wells, pipelines, access roads, and other project facilities would damage the land, plants (including those with ethnobotanical use) and animals, air,

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	smallest number feasible to maintain adequate night lighting for safety; (3) shielding and orientation of lights such that off-site visibility of light sources, glare, and light from construction activities is minimized to the extent feasible. No additional permanent poles shall be installed for lighting. This mitigation measure is not meant to replace or subsume any actions required by the County or state or federal entities with regard to lighting required for minimum security and safety purposes. **CUL-1a-8:** Prior to commencement of construction, PG&E shall submit as part of the final Remedial Design, a CIMP developed in coordination with Interested Tribes for DTSC's review and approval. The CIMP may be developed in coordination with the federal agencies with land management responsibilities in the project area (e.g., BLM and USFWS) in accordance with the Programmatic Agreement (Appendix PA). The CIMP shall include, at a minimum and to DTSC's satisfaction, the following: a. Protocols for continued communication. Consistent with past practice and the communication processes previously entered into by PG&E		water, and other physical features of the Topock Cultural Area, all of which contribute to the cultural significance of the area, which is experienced as a unique and sacred whole. ► Noise generated by the project during construction, operation and decommissioning is out of character and materially affects the cultural values of the Topock Cultural Area. ► Visual intrusions created during the construction, operation and decommission of the project is out of character and materially affects the cultural values of the Topock Cultural Area. These may include the introduction of wells to the floodplain, other landform alteration, or visual impacts associated with fugitive dust. ► Construction, operation and decommissioning of the project may affect native plants that are gathered by Native Americans for economic and traditional purposes. ► The transformation of Cr(VI) to Cr(III) would create an impact to the cultural and historical values associated with the Topock Cultural Area through the deposition of an unnatural amount of Cr(III) into the environment. ► Construction activities are considered "out of character" and could materially affect the cultural functionality of the Topock Cultural

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	with Interested Tribes, the company shall continue to communicate with Interested Tribes during the design, construction, operation, and decommissioning of the project. Prior to implementation of construction, PG&E shall communicate with Interested Tribes that place cultural significance on the Topock Cultural Area. Outreach efforts between the Tribes and PG&E shall be communicated by PG&E to DTSC quarterly during the design and construction phase for review and input, and annually during project operations. b. Protocols for the appropriate treatment of archaeological materials that may be disturbed or discovered during implementation of the final remedy, including protocols for the repatriation of significant items of cultural patrimony that may be recovered during the project, and protocols for the curation of cultural materials recovered during the project. Treatment of archaeological sites may include data recovery or capping. If data recovery is proposed, a Research Design following California		Area, for example the role of the area in funerary beliefs and practices. ► Construction activities and increased access roads may induce increased off-highway vehicular traffic in the Topock Cultural Area, which is considered an out of character with the cultural significance and would materially affect the Topock Cultural Area. To gain a better understanding of groundwater contamination, a work plan amendment related to groundwater characterization for the East Ravine and Compressor Station areas (CH2M Hill 2010) was prepared. The proposed groundwater characterization in this area would not directly affect any archaeological resource, but would result in the same significant and unavoidable impacts on the Topock Cultural Area as described herein for the project as a whole. Mitigation measures related to the East Ravine groundwater characterization are consistent with those presented in the cultural resources analysis of the EIR. The only mitigation that would reduce these impacts to a less-than-significant level would be avoidance of any type of project-related activity. While the project-related impacts are significant, it should be noted-that the evidence suggests that the Topock Cultural Area will retain its historical and cultural significance even after the proposed remedy is in operation and completed. Thus, there are mitigation measures that will reduce the level of impact, although not below

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	Office of Historic Preservation guidelines or federal guidelines, as applicable, shall be prepared and reviewed and approved by DTSC. c. Protocols for the review of cultural resource-related documents throughout the design, construction, and operational phases. d. Protocols for the review of project design documents before the beginning of construction, including reviews of project design documents throughout the design process (e.g., Preliminary [approximately 30% completed], Intermediate [approximately 60% completed] and Pre-final design). e. Protocols for the appropriate methods to be used to restore the environment to its preconstruction condition upon decommissioning of individual groundwater remedy facilities. f. A plan for the decommissioning and removal of the IM-3 Facility and proposed restoration of the site (to be an appendix to the CIMP). g. Protocols for the repatriation of clean soil cuttings generated during construction activities and		the level of significance. As noted above, the proposed remedy would completely avoid direct effects to the NRHP-listed and NRHP- and CRHR-eligible site CA-SBR-219 (including Loci A, B, and C, of the Topock Maze), such that no direct physical impacts would occur in those areas. Complete avoidance, however, of direct and indirect effects of the project, to the Topock Cultural Area and the physical characteristics that convey its historical significance is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. As such, impacts on the TCA as a historical resource would be significant and unavoidable. (FEIR, Volume 2, pp. 4.4-60 - 4.4-68.)

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	during drilling associated with repair/replacement activities during operations and maintenance phases. The soil cuttings shall be managed in compliance with applicable laws and regulations on site. h. Protocols for the appropriate methods, consistent with Mitigation Measure NOISE-3, to reduce auditory impacts. i. Protocols for the appropriate methods, consistent with Mitigation Measures AES-1 and AES-2, to reduce visual intrusions. j. Protocols for tribal notification in advance of project-related activities that the Interested Tribes may feel have the potential to cause adverse impacts to sensitive cultural resources. k. Protocols to be followed by project personnel to accommodate, if feasible as determined by DTSC, key tribal ceremonies that involve the Topock Cultural Area. l. Provisions affording sufficient tribal monitors to observe ground-disturbing activities and/or other scientific surveying (e.g., biological surveys) that may occur in preparation for construction		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	activities. Ground-disturbing activities include trenching, excavation, grading, well excavation/drilling, decommissioning of the IM-3 Facility and subsurface pipeline, or other construction-related activities. m. Provisions of reasonable compensation for tribal monitors consistent with historic rates. n. Locations requiring specific protective devices, such as temporary fencing, flagging, or other type of demarcation during construction. o. Protocols for the reporting of discoveries of cultural importance consistent with existing statutes and regulations. p. Protocols for the inspection of remediation facilities and/or staging areas throughout the construction phase. ***Mitigation during the design phase includes these specific actions:*** **CUL-1a-9:** During selection of the design and specific locations for physical remediation facilities, PG&E shall, in communication with the Interested Tribes (and subject to their review),		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	and to the maximum extent feasible, as determined by DTSC, give: (1) priority to previously disturbed areas for the placement of new physical improvements; and (2) priority to re-use of existing physical improvements, such as but not limited to wells and pipelines, but not including IM-3 facilities. "Disturbed" areas in this context means those areas outside of documented archaeological site boundaries that have experienced ground disturbance in the last 50 years. PG&E shall produce an aerial map of these disturbed areas to guide project design, and PG&E shall make a good faith effort to provide tribes with an opportunity to review and comment on the information displayed on the map in determining "disturbed" areas. **CUL-1a-10:** PG&E shall consider the location of Loci A, B, and C of the Topock Maze during the design and approval of the physical facilities necessary for the final remedy and is prohibited from creating any direct physical impact on the Topock Maze, as it is manifested archaeologically. Through the design, PG&E shall prevent all indirect (e.g. noise, aesthetics) impacts on the Topock Maze, to the maximum extent feasible as determined by DTSC. ***Mitigation during the design and construction***		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	phases includes these specific actions:		
	CUL-1a-11: PG&E shall provide an open grant for two part-time cultural resource specialist/project manager positions during the design and construction phases of the remediation project. The positions shall be filled by qualified members of an Interested Tribe as nominated by a majority vote of their Tribal Council(s) and appointed by DTSC's project manager if more than two members are nominated. The award of the grants is for continued involvement in review of project documents and participation in project-related meetings, including TRC meetings, at rates of historic compensation. Additionally, in light of FMIT's ownership of land in the project area and historical involvement in the environmental process, additional funding is guaranteed for one full-time FMIT position upon submission of an application by a qualified FMIT member who shall be appointed by the FMIT council, provided such funding is not duplicative of the services and funding provided by PG&E pursuant to the Settlement Agreement between PG&E and the FMIT in *Fort Mojave Indian Tribe v. Dept. of Toxic Substances Control, et al.*, Case No. 05CS00437 for a position with the FMIT's		

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	AhaMakav Culture Society. The payment of grant monies shall be timed to the awarded tribes' fiscal cycles so that the tribes are not forced to front funds for long periods of time. These positions shall act as cultural resources contacts and project managers for interactions between the tribes, PG&E, and DTSC to ensure coordination for review and comment of subsequent project and/or environmental documents related to the design and implementation of the groundwater remediation project to avoid, reduce, or otherwise mitigate impacts on historical resources, as defined by CEQA. This funding is separate from provisions for tribal monitor positions and shall not be used for routine tribal business or legal counsel. For review and approval, PG&E shall provide DTSC with the names of the selected grant recipients and an annual report that summarizes activities associated with the grant program. Upon the conclusion of the construction phase of the project, the necessity and dollar value of the grant program shall be assessed by PG&E and, with the approval of DTSC, shall either be extended or terminated under the operations and maintenance phase. ***Mitigation during the construction phase includes***		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	these specific actions: **CUL-1a-12:** PG&E shall provide reasonable opportunity, as determined by DTSC, for Interested Tribes to conduct a traditional healing/cleansing ceremony (or ceremonies) before and after the construction phase. ***Mitigation during the construction and O&M phases includes these specific actions:*** **CUL-1a-13:** PG&E shall, in communication with Interested Tribes, develop as part of the CMI Workplan, a worker cultural sensitivity education program. The program shall be implemented before commencement of construction and throughout construction and operations as personnel are added. This program may include information provided directly by tribal entities either in written form or on video, in a manner consistent with Appendix C in the existing BLM Programmatic Agreement. The worker cultural sensitivity education program shall ensure that every person working on the project as an employee or contractor, before participating in design or outdoor activities at the project site, is informed regarding: ► the cultural significance of the Topock Cultural Area,		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	► appropriate behavior to use within the Topock Cultural Area, ► activities that are to be avoided in the Topock Cultural Area, and ► consequences in the event of noncompliance.		
Impact CUL-1b and CUL-1c (During Design, Construction, O&M, and Decommissioning Consider the Location of Historical Resources and Implement Measures to Avoid Resources to the Extent Feasible): Cause Substantial Adverse Change in the Significance of a Historical Resource as Defined in CEQA Guidelines Section 15064.5. Construction, operation and maintenance, and decommissioning activities of the proposed project could result in substantial adverse changes to historical resources in the project area, including the (1) Topock Cultural Area, (2) other historical resources listed in Table 4.4-3, and (3) historical resources that could be identified during construction. Impacts could	**Mitigation Measure CUL-1b and CUL-1c:** ***During Design, Construction, O&M, and Decommissioning Consider the Location of Historical Resources and Implement Measures to Avoid Resources to the Extent Feasible.*** The following actions will reduce the potential for impacts on identified historically significant resources (other than the Topock Cultural Area, which is separately addressed in CUL-1a) within the project area. As detailed below, these actions include consideration of the location of historical resources, preparation of a cultural resources study, and preparation of a treatment plan. Monitoring of ground-disturbing activities during project construction will further protect historically significant resources. Protective actions are also described pertaining to the discovery of any previously unidentified potentially significant cultural resources. ***Mitigation during the design phase includes these specific actions:*** **CUL-1b/c-1:** PG&E shall consider the locations of the identified historic resources described above (Table 4.4-3) during the design of the physical	Significant and Unavoidable	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the Project that substantially lessen this impact's significant effects on the environment. Even with the implementation of the Mitigation Measure CUL-1b/c-1 through CUL-1b/c-4, the proposed project retains the potential to result in significant impacts to historically significant resources (other than the Topock Cultural Area, which is separately addressed in CUL-1a). Therefore, the proposed project's impacts to these historically significant resources are considered significant and unavoidable. DTSC further finds that complete avoidance of direct and indirect effects of the project to these historically significant resources identified in IMPACTS CUL-1b and CUL-1b is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. DTSC further notes that the proposed project completely avoids direct effects to the NRHP- listed and NRHP- and CRHR-eligible site CA-SBR-219, such that no direct physical impacts would occur in those areas (although, in

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
occur through ground disturbance and other project-related activities or through the introduction of out-of character visual or auditory intrusions to historical resources that gain their significance in part because historical associations or aesthetic values. This impact would be potentially significant. (FEIR, Volume 2, pp. 4.4-60 - 4.4-70.)	improvements necessary for the proposed project and avoid, minimize, or mitigate impacts on historical and archaeological resources to the maximum extent feasible, as determined by DTSC. The final design plans for the project will be submitted to DTSC for review and approval. **CUL-1b/c-2:** During preparation of the final design, and consistent with CUL-1a-3, PG&E shall retain a Qualified Cultural Resources Consultant to prepare a cultural resources study that assesses the potential for the construction, operations, or decommissioning of specific proposed improvements to result in significant impacts on identified historically significant resources described in Impacts CUL-1b and CUL-1c. This may include a geoarchaeological investigation and/or non-destructive remote-sensing surveys of potentially disturbed areas to determine if a potential exists for buried historical and archaeological resources. "Significant impacts" as used here means the potential for construction to demolish or materially alter in an adverse manner those physical characteristics of a resource that convey its historical significance and		noting this fact, DTSC concurs with the Final EIR's conclusion with respect to the significance of this impact). **Overriding Considerations:** The environmental, economic, social and other benefits of the project override the significant adverse impact of the project associated with the proposed project's impact to these historically significant resources, as more fully stated in the Statement of Overriding Considerations. **Facts in Support of Finding:** **IMPACT CUL-1b: Substantial Adverse Changes to the Other Identified Historical Resources (see Table 4.4-3 of FEIR, Volume 2).** Two resources that have been previously determined eligible for listing on the NRHP are located within the proposed project area. These resources consist of CA-SBR-2910H (remnant segments of Route 66) and CA-SBR-11701 (a prehistoric quarry site with associated hearth and artifacts). In addition CA-SBR-219 (Loci A, B, and C of the Topock Maze) is adjacent to the project area. In addition to being a contributing component of the Topock Cultural Area, this site qualifies as a historical resource under CEQA and could be subject to visual and auditory intrusions that affect its character as a historical resource (see Sections 4.1 and 4.9 of this EIR for further information on visual and noise-related impacts). These NRHP-eligible and

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	that justify its inclusion in, or eligibility for, inclusion in the CRHR. The study will be submitted to DTSC for review and evaluation to determine if existing mitigation measures are appropriate. **CUL-1b/c-3:** If the cultural resources study determines that the construction of physical improvements would result in significant impacts on identified historically significant resources described in Impacts CUL-1b and CUL-1c, and avoidance of the resource is not feasible, PG&E shall prepare a treatment plan that identifies measures to reduce these impacts (see above description of the CIMP) for DTSC's review and approval. The treatment plan shall identify which criteria for listing on the CRHR contribute to the affected resource's significance and which aspects of significance would be materially altered by construction, operations, or decommissioning and shall provide for reasonable efforts to be made to permit the resource to be preserved in place or left in an undisturbed state. Methods of accomplishing this may include capping or covering the resource with a layer of soil. To the extent that a resource cannot feasibly be preserved in place or left in an undisturbed state,		listed resources are automatically considered eligible for inclusion in the CRHR and are treated as historical resources under CEQA as described above. CA-SBR-2910H (Route 66) has significance as an important historical highway associated with westward migration during the Great Depression and postwar years. It could be subject to ground disturbance and out-of-character visual intrusions. Historic and prehistoric archaeological deposits that are spatially and functionally associated with the Maze or Route 66 are likely to contain information that would be important to the understanding of prehistoric lifeways or the use of Route 66. Additionally, other unevaluated cultural resources identified in Table 4.4-3 may qualify as historical resources under CEQA. While most of the cultural resources listed in Table 4.4-3 have not been formally evaluated for listing on the CRHR, sufficient information exists to conservatively consider that many of them are likely to qualify as historical resources. The variety and density of recorded resources within the project area suggests that they may have the potential to qualify for the CRHR for their associations with significant historical events or because of the information that they can provide in the study of prehistory and history. Thus it is reasonable to conservatively consider that some of the documented but currently unevaluated resources identified within the project area would qualify as historical resources, and they

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	excavation as mitigation shall be restricted to those parts of the resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a historically significant resource if the treatment plan determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource. The plan shall require communication with all Interested Tribes with regard to their perspectives and wishes for the treatment of the resources. ***Mitigation during the construction phase includes these specific actions:*** **CUL-1b/c-4:** Consistent with CUL-1a-3a above, PG&E shall retain a Qualified Cultural Resources Consultant to observe ground-disturbing activities and shall be required to request the participation of tribal monitors during those activities, including steps necessary during operations and decommissioning activities to ensure that historically significant resources are avoided to the maximum extent feasible, as determined by DTSC, during actual construction (see the description of the CMI Workplan, above). The Qualified Cultural		are all treated as such for purposes of the analysis in this EIR. Project construction, operations, and decommissioning could disturb or alter these historical resources. Disturbance could occur through ground-disturbing work that may be required within the boundaries of these resources and the introduction of intrusive new features to the landscape. Excavation within the boundaries of the archaeological sites would materially alter these historical resources by (1) disrupting the spatial associations that contain information about the prehistoric or historic lifeways represented by those sites or (2) by materially altering in an adverse manner the physical characteristics that convey the resource's historical significance. These impacts would be potentially significant. **IMPACT CUL-1c: Substantial Adverse Changes to As Yet Undiscovered Historical Resources** In addition to the currently identified cultural resources listed in Table 4.4-3, it is reasonable to conclude that undocumented archaeological sites or other historical resources under CEQA may be encountered during ground-disturbing construction activities within the project area. Such resources may be inadvertently disturbed or damaged by construction before such impacts can be avoided. Ground disturbing activities associated with the proposed project during construction, operation

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	Resources Consultant shall provide training to construction personnel on the locations of identified resources, values associated with the identified resources, responsibility for reporting suspected historic resources, and procedures for suspension of work in the immediate vicinity of the discovery, and shall use exclusionary fencing, flagging, or other appropriate physical barriers to mark the boundaries of identified resources. The Qualified Cultural Resources Consultant shall invite participation from Interested Tribal members to participate in the training. In the event that previously unidentified potentially significant cultural resources are discovered during ground-disturbing activities, the Qualified Cultural Resources Consultant shall have the authority to divert or temporarily halt ground-disturbing activities in the area of discovery to allow evaluation of the potentially significant cultural resources. If such discoveries occur on land managed by a federal agency, Stipulation IX (Discoveries) of the Programmatic Agreement shall apply and are deemed adequate by DTSC. If a discovery occurs on other lands within the project area, the Qualified Cultural Resources Consultant shall		and maintenance, and decommission would have the potential to cause substantial adverse changes to undocumented and/or buried archaeological historical resources or unique archaeological sites. This impact could result in potentially significant impacts on currently undocumented historical resources. The proposed project would have a substantial adverse impact on these historically significant resources (other than the Topock Cultural Area, which is separately addressed in CUL-1a). The area in which ground-disturbing activities and facilities would be located has been designed to avoid the NRHP- listed and NRHP- and CRHR-eligible site CA-SBR-219 (Loci A, B, and C, of the Topock Maze), such that no direct physical impacts would occur in these areas. The only mitigation that would reduce **IMPACT CUL-1b** and **IMPACT CUL-1c** to a less-than-significant level would be avoidance of any type of project-related activity. Complete avoidance, however, of direct and indirect effects of the project these historically significant resources is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. As such, impacts on historically significant resources (other than the Topock Cultural Area, which is separately addressed in CUL-1a) would be significant and unavoidable. (FEIR, Volume 2, pp. 4.4-60 - 4.4-70.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	contact the PG&E and DTSC project managers at the time of discovery and, in consultation with DTSC and tribal monitors, shall evaluate the resource before construction activities will be allowed to resume in the affected area. For significant cultural resources, and before construction activities are allowed to resume in the affected area, the resource(s) shall be recovered with coordination of the tribal monitors and DTSC. Recovery may include a Research Design and/or Data Recovery Program submitted to DTSC for review and approval. The Qualified Cultural Resources Consultant (and tribal monitors) shall determine the amount of material to be recovered for an adequate sample for analysis or data recovery. Any concerns or recommendations regarding the ground-disturbing activities or the handling of cultural resources shall be directed to the Qualified Cultural Resources Consultant or PG&E's site supervisor.		
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of a Unique Archaeological Resource. Many of the cultural resources listed in Table 4.4-3 may meet	**Mitigation Measure CUL-2:** *During Project Design Consider the Location of Unique Archaeological Resources and Avoid Resources to the Maximum extent Feasible* Cultural resources that qualify as unique archaeological sites in the project area would	Significant and Unavoidable	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the Project that substantially lessen this impact's significant effects on the environment. Even with the implementation of the Mitigation Measure CUL-2, the proposed

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
the CEQA criteria for a unique archaeological resource. Construction, operation and maintenance, and decommissioning activities of the proposed project could result in substantial adverse changes to one or more unique archaeological resource in the project area through ground disturbance and other project-related activities. This impact would be potentially significant. (FEIR, Volume 2, pp. 4.4-70 - 4.4-72.)	probably also meet one or more of the criteria for historical resources and would be subject to Mitigation Measures CUL-1b/c-2 and CUL-1b/c-3. The mitigation measures under this identified impact are the same as listed for Impact CUL-1b and CUL-1c. These mitigation measures would reduce the potential for impacts on unique archaeological resources.		project retains the potential to result in significant impacts to unique archaeological sites. Therefore, the proposed project's impacts to these resources are considered significant and unavoidable. **Overriding Considerations:** The environmental, economic, social and other benefits of the project override the significant adverse impact of the project associated with the proposed project's impact to unique archaeological sites, as more fully stated in the Statement of Overriding Considerations. **Facts in Support of Finding:** Cultural resources that qualify as unique archaeological sites in the project area would probably also meet one or more of the criteria for historical resources and would be subject to Mitigation Measures CUL-1b/c-2 and CUL-1b/c-3. The mitigation measures under this identified impact are the same as listed for Impact CUL-1b and CUL-1c. The only mitigation that would reduce IMPACT CUL-2 (as with IMPACT CUL-1b and IMPACT CUL-1c) to a less-than-significant level would be avoidance of any type of project-related activity. Complete avoidance, however, of direct and indirect effects of the project these historically significant resources is not feasible. This is because of the fundamental project objective of having an active remediation system

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			to clean up the contaminated groundwater plume. As such, impacts on unique archaeological sites would be significant and unavoidable. (FEIR, Volume 2, pp. 4.4-70 - 4.4-72.)
Impact CUL-3: Directly or Indirectly Destroy a Unique Paleontological Resource or Site or Unique Geologic Feature. The construction of wells (extraction, injection, and IRZ construction), water conveyance pipelines and other utility pathways, reductant storage facilities, and the grading of access roads throughout the project area may affect paleontological resources through ground disturbance activities. This impact would be potentially significant. (FEIR, Volume 2, p. 4.4-72.)	**Mitigation Measure CUL-3:** *Conduct Survey and Construction Monitoring.* A paleontological investigation, including a detailed survey of the project area by a qualified paleontologist, shall be conducted to refine the potential impacts on unique paleontological resources within the final design area and determine whether preconstruction recovery of sensitive resources and/or construction monitoring would be warranted. If construction monitoring is determined to be warranted, ground-altering activity would be monitored by a qualified paleontologist to assess, document, and recover unique fossils. Monitoring shall include the inspection of exposed surfaces and microscopic examination of matrix in potential fossil bearing formations. In the event microfossils are discovered, the monitor shall collect matrix for processing. In the event paleontological resources are encountered during earthmoving activities, recovered specimens shall be prepared by the paleontologist to a point of identification and permanent preservation. PG&E shall retain a Qualified Paleontologist to observe ground-disturbing activities where determined necessary based on the results of the paleontological investigation and shall be required to request the participation of tribal monitors during those	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** The paleontological investigation and construction monitoring by a qualified paleontologist, as appropriate, would ensure that all paleontological resources encountered during construction and grading activities would be documented, recovered, and curated at an appropriate facility, reducing the impact to less than significant. (FEIR, Volume 2, p. 4.4-72.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	activities, including steps necessary during operations and decommissioning activities to ensure that historically significant resources are avoided to the maximum extent feasible, as determined by DTSC, during actual construction (see above description of the CMI Workplan). Paleontological resources of scientific value shall be identified and curated into an established, accredited, professional museum repository in the region with permanent retrievable paleontological storage.		
Impact CUL-4: Disturbance of Human Remains, Including Those Interred Outside of Formal Cemeteries. Ground-disturbing activities required for all project phases may disturb as-yet undiscovered human remains, including Native American burial remains (i.e., human remains and grave goods). This impact would be potentially significant. (FEIR, Volume 2, pp. 4.4-73 - 4.4-74.)	**Mitigation Measure CUL-4:** ***With Discovery of Human Remains or Burials Suspend Work, Protect Remains, and Comply with Local,*** *State, and Federal Laws Regarding Discoveries During Ground-Disturbing Activities.* Ground-disturbing activities may disturb as-yet undiscovered human remains or Native American burials and associated grave goods. PG&E shall retain a Qualified Cultural Resource Consultant and request designated tribal monitor(s) to train construction personnel in the identification of human remains so that they may aid in the identification of such resources (see above description of the CIMP). A Qualified Cultural Resource Consultant and tribal monitor(s) shall be in place to adequately oversee all ground-disturbing activities. In the event human remains are uncovered over the course of project construction, operation and maintenance, and/or decommissioning activities, the following procedures shall be followed to ensure compliance with all applicable	Significant and Unavoidable	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the Project that substantially lessen this impact's significant effects on the environment. Even with the implementation of the Mitigation Measure CUL-4, the proposed project retains the potential to result in significant impacts on unknown human remains in the project area. Therefore, this impact is considered significant and unavoidable. **Overriding Considerations:** The environmental, economic, social and other benefits of the project override the significant adverse impact of the project associated with the proposed project's potential to result in significant impacts on unknown human remains, as more fully stated in the Statement of Overriding Considerations.

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	local, state, and federal laws. ► The construction contractor shall immediately suspend work within the vicinity of the discovery and determine if the remains discovered are human or nonhuman. This determination shall be made by the Qualified Cultural Resources Consultant, a qualified archaeologist and/or physical anthropologist with expert skill in the identification of human osteological (bone) remains. ► The Qualified Cultural Resources Consultant (and tribal monitor), or construction contractor, shall protect discovered human remains and/or burial goods remaining in the ground from additional disturbance. ► The Qualified Cultural Resources Consultant, archaeologist, or construction site supervisor shall contact the San Bernardino County Coroner, and the PG&E and DTSC project managers immediately. In California, all subsequent action shall conform to the protocols established in the Health and Safety Code and regulations. In Arizona, the Qualified Cultural Resources Consultant or PG&E construction site supervisor will follow Arizona laws and the implementing regulations. Human remains found on federal land would require the notification of the BLM Havasu City field office and compliance with applicable federal laws and regulations, including the Native American Graves Protection and Repatriation Act if the remains are determined to be of Native American origin. The Qualified Cultural		**Facts in Support of Finding:** Even with the implementation of the mitigation measure presented above, the proposed project retains the potential to result in significant impacts on unknown human remains in the project area. The only mitigation that would reduce this impact to a less-than-significant level would be avoidance of any type of project-related activity. Complete avoidance, however, of direct and indirect effects of the project these historically significant resources is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. As such, the project's potential to result in significant impacts on unknown human remains would be significant and unavoidable. (FEIR, Volume 2, pp. 4.4-73 - 4.4-74.)

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	Resources Consultant shall coordinate the interaction between Interested Tribes, PG&E, the County, and DTSC to determine proper treatment and disposition of any remains. ► The San Bernardino County Coroner will determine if the remains are of recent origin and if an investigation of the cause of death is required (California Health and Safety Code Section 7050.5). If the coroner determines that the human remains are not Native American and not evidence of a crime, project personnel shall coordinate with the Qualified Cultural Resources Consultant (s) to develop an appropriate treatment plan. This may include contacting the next-of-kin to solicit input on subsequent disposition of the remains. If there is no next-of-kin, or recommendations by the next-of-kin are considered unacceptable by the landowner, the landowner will reinter the remains with appropriate dignity in a location outside the project area and where they would be unlikely to be disturbed in the future. ► In the event that the San Bernardino County Coroner determines that the human remains are Native American and not evidence of a crime, project personnel shall contact the NAHC so that a most likely descendent (MLD) can be identified as required under California Public Resources Code Section 5097.98. ► The MLD (s) shall inspect the area in which the human remains were found and provide treatment recommendations to the landowner and PG&E site manager in accordance with the		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	provisions of PRC Section 5097.98. The treatment may include reburial, scientific removal of the discovered human remains and relinquishment to the MLD(s), nondestructive analysis of human remains and/or other culturally appropriate treatment. If the MLD(s) so requests, the landowner would reinter the remains with the appropriate dignity in a location outside the area of disturbance in a location unlikely to be disturbed in the future. ► To the maximum extent feasible, Mitigation Measure CUL-4 shall be implemented in a manner that is consistent with mitigation required by local, state, and federal requirements.		
4.5 Geology and Soils			
Impact GEO-1a (Construction, Operation and Maintenance, and Decommissioning Impacts Related to Erosion of Soils): The proposed project could result in ground-disturbing activities that could alter the natural drainage patterns and erosion rates of the area (erosion impact). (FEIR, Volume 2, pp. 4.5-47 - 4.5-48.)	**Mitigation Measure GEO-1a:** a. A DTSC-approved grading and erosion control plan, prepared by a California Registered Civil Engineer, shall be completed prior to implementation of any grading in areas of the site where there is a potential for substantial erosion or loss of top soils. The plan shall outline specific procedures for controlling erosion or loss of topsoil during construction, operation and maintenance, and decommissioning. b. To ensure soils do not directly or indirectly discharge sediments into surface waters as a result of construction, operation and maintenance, or decommission activities,	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially environmental effect as identified in the FEIR. **Facts in Support of Finding:** The impact would be less than significant after implementing the measures detailed above because the grading and compaction measures along with erosion control measures would be in place and maintained to control the water and wind erosion of on-site soils. (FEIR, Volume 2, pp. 4.5-47 - 4.5-48.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	PG&E shall develop a SWPPP as discussed in mitigation measure HYDRO-1 of the "Hydrology and Water Quality" section of this EIR. The SWPPP shall identify best management practices (BMPs) that would be used to protect stormwater runoff and minimize erosion during construction. PG&E shall prepare plans to control erosion and sediment, prepare preliminary and final grading plans, and shall prepare plans to control urban runoff from the project site during construction, consistent with the substantive requirements of the San Bernardino County Building and Land Use Services Department for erosion control. c. During road preparation activities, loose sediment shall be uniformly compacted consistent with the substantive San Bernardino County Building and Land Use Services Department requirements to aid in reducing wind erosion. Ongoing road maintenance including visual inspection to identify areas of erosion and performing localized road repair and regrading, installation and maintenance of erosion control features such as berms, silt fences, or straw wattles, and grading for road smoothness shall be performed as needed to reduce potential for erosion. d. Regarding the potential for contaminated soils to be eroded and contribute contamination into receiving waters, Mitigation Measures GEO-2 and HAZ-2 shall be implemented. Mitigation Measure GEO-2 provides the provisions for mitigating erosion through BMPs which shall		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	be implemented. Mitigation Measure HAZ-2 provides the provisions for safe work practices and handling of contaminated soils as investigation derived wastes.		
Impact GEO-1b (Construction, Operation and Maintenance, and Decommissioning Impacts Related to Differential Compaction of Soils): The proposed project could result in ground-disturbing activities that could alter the natural drainage patterns and erosion rates of the area (drainage patterns impact). (FEIR, Volume 2, pp. 4.5-47 - 4.5-49.)	**Mitigation Measure GEO-1b:** a. BMPs shall be implemented during construction, operation and maintenance, and decommissioning activities to minimize impacts on the affected areas. Such BMPs could include, but would not be limited to, the following: uniform compaction of roadways created for accessing the project area as per San Bernardino County Building and Land Use Services Department requirements, returning areas adversely affected by differential compaction to preexisting conditions when these areas are no longer needed, and continuing maintenance of access roads, wellhead areas, and the treatment facility areas. b. Work area footprints shall be minimized to the greatest extent feasible to limit the areas exposed to differential compaction. Where possible, existing unpaved access roads and staging/working areas shall be reused and maintained for different stages of the construction. New graded areas for staging or for access roads shall be compacted to a uniform specification, typically on the order of 90 to 95% compaction and consistent with substantive San Bernardino County Building and Land Use Services Department requirements to reduce differential compaction and subsequent erosion of site soils.	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** The impact would be less than significant after implementing the measures detailed above because unnatural erosion hazards caused by differential compaction will be addressed through uniform grading and compaction consistent with substantive San Bernardino County requirements, affected areas for which the project increased the potential for erosion over original site conditions will be returned to original site conditions, BMPs will minimize the effect of component stages, and the extent of areas affected will be minimized to the extent feasible. (FEIR, Volume 2, pp. 4.5-47 - 4.5-49.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	c. After the completion of the operation and maintenance phase, the disturbed areas which result in increased potential for compaction shall be returned to their respective preexisting condition by regrading consistent with the preconstruction slopes as documented through surveys that may include topographic surveys or photo surveys. The areas will be returned to the surrounding natural surface topography and compacted consistent with unaltered areas near the access roads or staging areas in question. The habitat restoration plan outlined in mitigation measure BIO-1 shall include restoration of native vegetation or other erosion control measures where revegetation would be infeasible or inadequate, for purposes of soil stabilization and erosion control of the project area.		
4.6 Hazardous Materials			
Impact HAZ-1a (Spills or Releases of Contaminants during Operation and Maintenance Activities): Operation and maintenance of the proposed project could result in the potential release of chemicals during use or delivery of chemicals as a result of component failure (e.g., valve, flange, or pipe), tank failure, or human error (e.g., tank overfilling). (FEIR, Volume 2, pp. 4.6-14 - 4.6-	**Mitigation Measure HAZ-1a:** a. PG&E shall store, handle, and transport hazardous material in compliance with applicable local, state, and federal laws. b. All chemical storage and loading areas shall be equipped with proper containment and spill response equipment. BMPs to be implemented may include, but are not limited to, use of secondary containment in mixing and storage areas; availability of spill kits and spill containment booms, and appropriate storage containers for containment of the materials generated during the spill response.	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially environmental effect as identified in the FEIR. **Facts in Support of Finding:** With Mitigation Measure HAZ-1a, this impact would be reduced to a less-than-significant level because measures and plans would be in place to prevent spills of hazardous materials from occurring and to appropriately handle spills in the event that they occur on-site. (FEIR, Volume 2, pp. 4.6-14 - 4.6-16.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
16.)	c. A project-specific HMBP, chemical standard operating procedure (SOP) protocols and contingency plans shall be developed to ensure that proper response procedures would be implemented in the event of spills or releases. Specifically, the HMBP and SOPs shall describe the procedures for properly storing and handling fuel on-site, the required equipment and procedures for spill containment, required personal protective equipment (PPE), and the measures to be used to reduce the likelihood of releases or spills during fueling or vehicle maintenance activities. BMPs to be implemented may include, but are not limited to, use of secondary containment in mixing and storage areas; availability of spill kits and spill containment booms, and appropriate storage containers for containment of the materials generated during the spill response. The field manager in charge of operations and maintenance activities shall be responsible for ensuring that these procedures are followed at all times.		
Impact HAZ-1b (Spill or Release of Contaminants during Construction and Decommissioning Activities): Operation and maintenance of the proposed project could result in the potential release of chemicals during use or delivery of chemicals as a result of component failure (e.g., valve, flange, or pipe),	**Mitigation Measure HAZ-1b:** a. Fueling areas and maintenance areas would be supplied with proper secondary containment and spill response equipment. b. PG&E shall develop fueling SOP protocols and a contingency plan that would be implemented at all fueling areas on site. The SOPs shall describe the procedures for properly storing and handling fuel on-site, the required equipment and procedures for spill containment, required PPE, and the measures to be used to reduce the	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** With Mitigation Measure HAZ-1b, this impact would be reduced to a less-than-significant level because measures and plans would be in place to prevent spills or releases of hazardous materials from occurring and to appropriately handle spills in the event

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
tank failure, or human error (e.g., tank overfilling). (FEIR, Volume 2, pp. 4.6-14 - 4.6-17.)	likelihood of releases or spills during fueling or vehicle maintenance activities. Potential measures include but are not limited to, fuel storage in bermed areas, performing vehicle maintenance in paved and bermed areas, and availability of spill kits for containment and cleanup of petroleum releases. The field manager in charge of construction and decommissioning activities shall be responsible for ensuring that these procedures are followed at all times. c. PG&E shall comply with local, state, and federal regulations related to the bulk storage and management of fuels.		they occur on-site. (FEIR, Volume 2, pp. 4.6-14 - 4.6-17.)
Impact HAZ-2: Construction, operation and maintenance, and decommissioning activities associated with the proposed project could result in the generation of dust and the exposure of construction workers to airborne contaminants [e.g., Cr(VI), total petroleum hydrocarbons, volatile organic carbons, semivolatile organic carbons] determined to be in the soil of the project site or that further investigation may determine to be in the soil. (FEIR, Volume 2, pp. 4.6-17 - 4.6-19.)	**Mitigation Measure HAZ-2:** Before initiating ground-disturbing operations, a health and safety plan shall be developed and implemented by qualified environmental professionals to ensure health and safety precautions are being met. It is not possible to prepare the health and safety plan at this stage of the planning process because final construction plans and other design documents have not been finalized in sufficient detail. However, at a minimum, the health and safety plan shall include procedures to mitigate potential hazards, and such procedures shall include the use of PPE, measures that provide protection from physical hazards, measures that provide protection from chemical hazards that may be present at the site, decontamination procedures, and worker and health and safety monitoring criteria to be implemented during construction. The worker health and safety plan shall include protective measures and PPE that	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Exposure to chemicals from excavated or disturbed soil would be less than significant after mitigation as the result of limiting generation of contaminated dust during work activities, reducing worker exposures to such soils through best management practices, and use of personal protective equipment. (FEIR, Volume 2, pp. 4.6-17 - 4.6-19.)

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	are specific to the conditions of concern and meet the requirements of the U.S. Occupational Safety and Health Administration's (OSHA's) construction safety requirements and Hazardous Waste Operations and Emergency Response Standard (29 CFR 1910.120). In accordance with OSHA requirements, appropriate training and recordkeeping shall also be a part of the health and safety program. The worker health and safety plan shall be certified by a Certified Industrial Hygienist in accordance with OSHA regulations. The worker health and safety plan shall be explained to the construction workers and all workers shall be required to sign the plan, which will be kept on the construction site at all times. Worker safety training shall occur prior to initiation of ground disturbing activities. Training shall include the review of all health and safety measures and procedures. All workers and engineering inspectors at the site shall provide written acknowledgement that the soils management plan (discussed below), worker health and safety plan, and community health and safety plan were reviewed and training was received prior to commencement of construction activities. The following are specific elements and directives that shall be included in the health and safety plan and implemented by PG&E during construction, operation and maintenance, and decommissioning of this project: a. Vehicles traveling on unpaved roadways or surfaces would be directed to avoid traveling in areas where contaminated soils are known to be		

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	present; vehicle speeds shall be controlled (e.g., limited to 15 mph or slower) to limit generation of dust; measures, such as wetting of surfaces, will be employed to prevent dust generation by vehicular traffic or other dust-generating work activities. b. Premobilization planning shall occur during which the likelihood of encountering contaminated soils shall be reviewed along with the HMBP, site-specific health and safety plan, and SOPs so that the procedures are followed and the contingencies for handling contaminated soils are in-place prior to implementing the field operations. c. Should evidence of contaminated soil be identified during ground disturbing activities (e.g., noxious odors, discolored soil), work in this area will immediately cease until soil samples can be collected and analyzed for the presence of contaminants by the site supervisor or the site safety officer. Contaminated soil shall be managed and disposed of in accordance with a project-specific health and safety plan and soil management plan. The health and safety plan and soil management plan shall be approved by DTSC before beginning any ground disturbing activities. While the project is exempt from the requirements of the San Bernardino County Division of Environmental Health, the health and safety plan and soil management plan shall be prepared in general accordance with the substantive requirements of this agency.		

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	d. In the event that drilling sites must be located within areas of suspected soil contamination, the appropriate PPE shall be worn by all personnel working in these areas and methods specified in the health and safety plan used to control the generation of dust. When working in these areas, personnel shall be required to follow all guidance presented in the site-specific health and safety plan and soil management plan. The site-specific health and safety plan shall include provisions for site control such as, but not limited to, delineation of the exclusion, contaminant reduction and support zones for each work area, decontamination procedures, and procedures for the handling of contaminated soils and other investigation derived wastes. Soil that is excavated shall be loaded directly into containers such as roll-off bins; dust suppression methods shall be used prior to and during loading of soils into the bins. Suspected contaminated soils shall be segregated from suspected uncontaminated soils. e. Personnel working at the site shall be trained in Hazardous Waste Operations. f. All soil excavated and placed in roll-off bins or trucks for transportation off-site shall be covered with a tarp or rigid closure before transporting, and personnel working in the area shall be positioned upwind of the loading location.		
4.7 Hydrology and Water Quality			

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
Impact HYDRO-1: Construction, operation and maintenance, and decommissioning activities associated with the proposed project could result in (i) the exceedance of water quality standards as a result of increased runoff from impervious surfaces and (ii) exceedance of water quality standards due to potential exposure of runoff to significant materials stored, handled, and transported at the site. This would be a potentially significant impact. (FEIR, Volume 2, pp. 4.7-48 - 4.7-54.)	**Mitigation Measure HYDRO-1:** The project shall implement BMPs to meet the substantive criteria of NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ NPDES No. CAS000002 (General Permit) (SWRCB 2009) as well as all other applicable federal, state, and local permit and regulatory requirements, even if a permit is not required pursuant to CERCLA, for purposes of ensuring the protection of receiving water quality. As such, a BMP plan shall be prepared and implemented for the project prior to construction and decommissioning phase activities. Impacts on water quality from pollutants, including soils from erosion, shall be controlled through use of the following types of BMPs, which shall be incorporated into the appropriate project-specific BMP plan. The General Permit requirements include specific BMPs as well as numeric effluent levels (NELs) and numeric action levels (NALs) to achieve the water quality standards (SWRCB 2009:3). Types of BMPs cited in the General Permit (SWRCB 2009:Attachment A:7) include: ► Scheduling of Activities; ► Prohibitions of Practices; ► Maintenance Procedures; ► Other Management Practices to Prevent or Reduce Discharge of Pollutants to Waters of the United States; ► Treatment Requirements; and ► Operating Procedures and Practice to Control	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Implementation of appropriate BMPs defined in Mitigation Measure HYDRO-1 would minimize impacts on water quality by controlling runoff and by ensuring that the quality of stormwater flows meets the relevant requirements. Consequently, any impacts resulting from alterations of drainage and hydrology and water quality during construction, operation and maintenance, and decommissioning would be mitigated to a level of less than significant. (FEIR, Volume 2, pp. 4.7-48 - 4.7-54.)

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	Site Runoff, Spillage or Leaks, Sludge or Waste Disposal, or Drainage from Raw Materials Storage. Visual inspections and monitoring and sampling are required under the General Permit to evaluate the effectiveness of the BMPs and to determine whether modifying BMPs or implementing additional BMPs is required. The BMP designations cited below are based on those used by the *California Stormwater Quality Association Construction BMP Handbook* (California Stormwater Quality Association 2003) and are consistent with the types of BMPs referenced in the General Permit: ► Scheduling (SS-1): Proper scheduling assists in identifying ways to minimize disturbed areas, which allows for a reduction in the active project area requiring protection and also minimizes the length of time disturbed soils are exposed to erosive processes. ► Preservation of Existing Vegetation (SS-2): Preserving existing vegetation to the maximum extent practicable facilitates protection of surfaces from erosion and can also help to control sediments. Sensitive areas should also be clearly identified and protected. ► Hydraulic Mulch (SS-3), Straw Mulch (SS-6), and Wood Mulching (SS-8): Using various mulches is a method for temporarily stabilizing soil and can be used on surfaces with little or no slope. ► Geotextiles, Plastic Covers, and Erosion Control Blankets/Mats (SS-7): These erosion control methods can be used on flat or, usually, sloped		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	surfaces, channels, and stockpiles. ► Stabilized Construction Entrance/Exit (TC-1): A graveled area or pad located at points where vehicles enter and leave a construction site can be built. This BMP provides a buffer area where vehicles can drop their mud and sediment to avoid transporting it onto public roads, to control erosion from surface runoff, and to help control dust. ► Runoff Control Measures (SS-9, SS-10, and SC-10): These include graded surfaces to redirect sheet flow, diversion dikes or berms that force sheet flow around a protected area, and stormwater conveyances (swales, channels, gutters, drains, sewers) that intercept, collect, and redirect runoff. Diversions can be either temporary or permanent. Temporary diversions include excavation of a channel along with placement of the spoil in a dike on the downgradient side of the channel, and placement of gravel in a ridge below an excavated swale. Permanent diversions are used to divide a site into specific drainage areas, should be sized to capture and carry a specific magnitude of storm event, and should be constructed of more permanent materials. A water bar is a specific kind of runoff diversion that is constructed diagonally at intervals across a linear sloping surface such as a road or right-of-way that is subject to erosion. Water bars are meant to interrupt accumulation of erosive volumes of water through their periodic placement down the slope, and divert the resulting segments of flow into adjacent undisturbed areas for dissipation. ► Silt Fence (SC-1): A temporary sediment barrier		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	consisting of fabric is designed to retain sediment from small disturbed areas by reducing the velocity of sheet flows. ► Gravel Bag Berm (SC-6) and Sand/Gravel Bag Barrier (SC-8): A temporary sediment barrier consisting of gravel-filled fabric bags is designed to retain sediment from small disturbed areas by reducing the velocity of sheet flows. ► Desilting Basin (SC-2) and Sediment Trap (SC-3): Constructing temporary detention structures facilitates the removal of sediment from waters. The devices provide time for sediment particles to settle out of the water before runoff is discharged. Secondary concerns include potential pollutants from inappropriate material storage and handling procedures and nonstormwater discharges. These will be addressed through the following types of BMPs, which shall be incorporated into the stormwater BMP plan: ► Material Delivery and Storage (WM-1): Provide covered storage for materials, especially toxic or hazardous materials, to prevent exposure to stormwater. Store and transfer toxic or hazardous materials on impervious surfaces that will provide secondary containment for spills. Park vehicles and equipment used for material delivery and storage, as well as contractor vehicles, in designated areas. ► Spill Prevention and Control (WM-4): Ensure that spills and releases of materials are cleaned up immediately and thoroughly. Ensure that appropriate spill response equipment, preferably spill kits preloaded with absorbents in an overpack		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	drum, is provided at convenient locations throughout the site. Spent absorbent material must be managed and disposed of in accordance with applicable regulations. In particular, absorbents used to clean up spills of hazardous materials or waste must be managed as hazardous waste unless characterized as nonhazardous. ► Solid Waste Management (WM-5): Provide a sufficient number of conveniently located trash and scrap receptacles to promote proper disposal of solid wastes. Ensure that the receptacles are provided with lids or covers to prevent windblown litter. ► Hazardous Waste Management (WM-6): Provide a sufficient number of proper receptacles to promote proper disposal of hazardous wastes. ► Concrete Waste Management (WM-8): Dispose of excess concrete in specific concrete washout facilities. ► Sanitary/Septic Waste Management (WM-9): Locate sanitary and septic waste facilities away from drainage courses and traffic areas. Maintain the facilities regularly. ► Vehicle and Equipment Cleaning (NS-8): Clean vehicles and equipment that regularly enter and leave the construction site. ► Vehicle and Equipment Fueling (NS-9): Fuel vehicles and equipment off-site whenever possible. If off-site fueling is not practical, establish a designated on-site fueling area with proper containment and spill cleanup materials.		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	► Vehicle and Equipment Maintenance (NS-10): Use off-site maintenance facilities whenever possible. Any on-site maintenance areas must be protected from stormwater runoff and on-site flooding. In addition to BMPs implemented to avoid or reduce impacts from the construction and decommissioning phases, BMPs shall also be implemented to avoid or reduce impacts from the operations and maintenance phases. To address potential violation of water quality standards caused by insufficient treatment, system failure at concentrations in excess of water quality standards, proper design shall include contingency measures such as safeguards to shut down the extraction wells in case of pipeline failure or malfunction. In addition, operation of the proposed project will be governed by and follow an operations and maintenance plan. PG&E will comply with all applicable water quality standards, the General Permit, and any SWRCB or RWQCB resolutions identified as ARAR, as well as a corrective action monitoring program. Under the corrective action monitoring program, data will be collected to measure performance of the remedy, compliance with standards, and progress of the remedial action as a part of the project description. In addition, the project will be operated to continually assess performance issues and to modify the type, method, and configuration of the treatment delivery systems to enhance performance of the remedy to attain the cleanup goals and to respond to site conditions and performance issues as described in the project description.		

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	A SWPPP will also be prepared for the proposed project, which will contain BMPs related to industrial activities (industrial SWPPP). The BMPs are designed to reduce pollutants in discharges that may affect receiving water quality during operations and maintenance of the proposed project. As noted above, BMP designations are based on those used by the *California Stormwater Quality Association Construction BMP Handbook* (California Stormwater Quality Association 2003) and those referenced in the General Permit The SWPPP will incorporate BMPs such as the following: ► Good Housekeeping: Maintain facility in a clean manner and train facility personnel to contribute to a safe, clean, and orderly environment by properly disposing of trash in designated containers, storing materials in appropriate locations, and keeping equipment clean and in good working condition. ► Preventative Maintenance: Prevent or minimize release of pollutants. Develop Standard Operating Procedures for operation and maintenance of facility components and train employees to follow the procedures. ► Non-Stormwater Discharges (SC-10): Ensure that used oil, used antifreeze, and hazardous chemical recycling programs are being implemented. Conduct regular inspections of high priority areas. ► Spill Prevention, Control, and Cleanup (SC-11): Store materials properly to prevent spills from entering the storm drain system or surface		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	waters. Ensure that spill cleanup materials are located on-site and are easily accessible. Clean up leaks and spills immediately using proper absorbent materials. Absorbents used to clean up hazardous materials must be disposed of as hazardous waste. Educate employees about spill prevention and cleanup. ► Vehicle and Equipment Fueling (SC-20): Maintain clean fuel-dispensing areas using dry cleanup methods, such as sweeping or using rags and absorbents for leaks and spills. Cover the fueling area to prevent contact with stormwater. Train personnel in pollution prevention, focusing on containment of spills and leaks. ► Outdoor Loading/Unloading (SC-30): Load and unload chemicals during dry weather, if possible, and load and unload in designated areas. Check equipment regularly for leaks. ► Outdoor Liquid Container Storage (SC-31): Cover the storage area with a roof and provide secondary containment. Inspect storage areas regularly for leaks or spills. ► Outdoor Equipment Operations (SC-32): Perform activities during dry weather, cover the work area with a roof, and use secondary containment. Train employees in proper techniques for spill containment and cleanup. ► Waste Handling and Disposal (SC-34): Cover storage containers with leak-proof lids, check for leaks weekly, and clean storage areas regularly. Ensure that wastes are disposed of		

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	properly. ► Tank Design System: Ensure that tank systems have sufficient strength to avoid collapse, rupture, or failure and that they are protected against physical damage and excessive stress. Provide adequate secondary containment. In conformance with the substantive requirements of General Permit (Order No. 2009-0009-DWQ) a monitoring and reporting program will be implemented to assess the effectiveness of BMPs and to modify BMPs and revise the SWPPP, if necessary, to continue to reduce pollutants and impacts on receiving waters. The monitoring program shall include the following minimum elements as per the General Permit: ► quarterly, nonstormwater visual inspections, ► storm-related visual inspections within 2 business days of a qualifying rain event (producing precipitation of 1/2 inch or more of discharge), ► visual inspection after a storm event, ► monitoring of nonvisual pollutants based on the calculated risk level for the project, with Risk Level 2 and 3 requiring a minimum of three samples per day during qualifying rain events (SWRCB 2009:Tables 5 and 6, 22-27), and ► monitoring and reporting for linear projects as per Attachment A of the General Permit Results of this monitoring shall be reported annually		

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	to DTSC and to the Storm Water Multi-Application Reporting and Tracking System (SMARTS). The annual report shall include a summary and evaluation of all sampling and analysis results, original laboratory reports, and chain of custody forms; a summary of all corrective actions taken during the compliance year; and identification of any compliance activities or corrective actions that were not implemented. NEL Violation Reports and/or NAL Violation Reports are required for Risk Level 3 and linear underground/overhead project (LUP) Type 3 Discharges. Should the project meet these criteria, the respective reports shall be submitted within 5 days of the end of the storm event, as per General Permit requirements, and provide the required information identified (SWRCB 2009:26–27 and Attachment A). The implementation of stormwater plans shall include an education component to train workers on water quality concerns and proper BMP implementation, maintenance, and repair, in addition to stormwater management program training on the construction BMP plan and industrial SWPPP.		
Impact HYDRO-2: The proposed project would require the construction of impervious surfaces that could result in increased flows from individual project sites within	**Mitigation Measure HYDRO-2:** Implement Mitigation Measure HYDRO-1. Implementation of appropriate BMPs defined in Mitigation Measure HYDRO-1 would minimize impacts on water quality by controlling erosion and siltation.	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR.

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
the project area that could result in an increase of erosion and siltation on the project site and off-site. (FEIR, Volume 2, p. 4.7-54.)			**Facts in Support of Finding:** Implement Mitigation Measure HYDRO-1. Implementation of appropriate BMPs defined in Mitigation Measure HYDRO-1 would minimize impacts on water quality by controlling erosion and siltation. Consequently, any impacts associated with erosion and siltation resulting from alterations of drainage and hydrology and water quality during construction, operation and maintenance, and decommissioning would be mitigated to a less-than-significant level. (FEIR, Volume 2, p. 4.7-54.)
Impact HYDRO-3: The proposed project does not include discharge to an existing or planned stormwater drainage system. The project does have the potential to contribute substantial additional sources of polluted runoff if materials and operations are not properly handled. (FEIR, Volume 2, p. 4.7-55.)	**Mitigation Measure HYDRO-3:** Implement Mitigation Measure HYDRO-1. Mitigation Measure HYDRO-1 shall be implemented. Implementation of appropriate BMPs defined in Mitigation Measure HYDRO-1 would minimize impacts on water quality by controlling potential pollutants, including sediment, and runoff discharges from the project area.	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Implement Mitigation Measure HYDRO-1. Mitigation Measure HYDRO-1 shall be implemented. Implementation of appropriate BMPs defined in Mitigation Measure HYDRO-1 would minimize impacts on water quality by controlling potential pollutants, including sediment, and runoff discharges from the project area. Consequently, any impacts associated with pollutants resulting from alterations of drainage and water quality during construction, operation and maintenance, and decommissioning would be mitigated to a less-than-significant level. (FEIR, Volume 2, p. 4.7-55.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
4.8 Land Use and Planning			
None			
4.9 Noise			
Impact NOISE-1: Implementation of the proposed project would result in the exposure of sensitive receptors to groundborne noise and vibration levels that exceed the applicable standards of the San Bernardino County Development Code (83.01.090) and the Mohave County Zoning Ordinance (Table 4.9-9). These groundborne noise and vibration levels could result in annoyance or architectural/structural damage. (FEIR, Volume 2, pp. 4.9-19 - 4.9-21.)	**Mitigation Measure NOISE-1:** ► Construct new wells a minimum of 45 feet from vibration-sensitive receptors. Avoid constructing wells within 30 feet of vibration-sensitive land uses located in California and 275 feet of vibration-sensitive land uses located in Arizona; A disturbance coordinator will be designated by the project applicant, which will post contact information in a conspicuous location near the entrance so that it is clearly visible to nearby receivers most likely to be disturbed. The coordinator will manage complaints resulting from the construction vibration. Reoccurring disturbances will be evaluated by a qualified acoustical consultant retained by the project applicant to ensure compliance with applicable standards. The disturbance coordinator will contact nearby vibration-sensitive receptors, advising them of the construction schedule.	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Mitigation Measure NOISE-1 would ensure construction of new wells would occur sufficient distances from vibration-sensitive land uses and receptors to prevent property damage and annoyances. The impact would be less than significant after implementation of the measures detailed above. (FEIR, Volume 2, pp. 4.9-19 - 4.9-21.)
Impact NOISE-2: Implementation of the proposed project would result in intermittent construction activities associated with the installation of new wells, roadways, water conveyance,	**Mitigation Measure NOISE-2:** ► Construction equipment shall be properly maintained per manufacturer specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All impact tools shall be shrouded or shielded, and all intake and exhaust ports on power	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Mitigation Measure NOISE-2 would ensure the compliance

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
utilities, roadways, water filtration facilities, operations, and maintenance. These construction activities could potentially expose sensitive receptors to noise levels in excess of the applicable noise standards and/or result in a substantial increase in ambient noise levels. (FEIR, Volume 2, pp. 4.9-21 - 4.9-24.)	equipment shall be muffled or shielded. ► Construction equipment shall not idle for extended periods of time (more than 15 minutes) when not being utilized during construction activities. ► Construction activities shall include the use of berms, stockpiles, dumpsters, and or bins to shield the nearest noise-sensitive receptor adjacent to construction activities to within acceptable nontransportation noise level standards. When construction activities are conducted within the distances outlined above (i.e., 1,850 feet and 5,830 feet from California receptors and 330 feet and 735 feet from Arizona receptors for daytime and nighttime noise, respectively) relative to noise-sensitive uses in the project area, noise measurements shall be conducted by a qualified acoustical consultant at the nearest noise-sensitive land use relative to the construction activities with a sound level meter that meets the standards of the American National Standards Institute (ANSI Section S14 1979, Type 1 of Type 2) to ensure that construction noise associated with the project component complies with applicable daytime and nighttime noise standards. If noise levels are still determined to exceed noise standards, temporary barriers shall be erected as close to the construction activities as feasible, breaking the line of sight between the source and receptor where noise levels exceed applicable standards. All acoustical barriers shall be constructed with material having a		of applicable noise standards and reduce noise levels by 2 dB to 5 dB at the noise-sensitive uses to the east of the project area. The impact would be less than significant after implementation of the measures detailed above. (FEIR, Volume 2, pp. 4.9-21 - 4.9-24.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	minimum surface weight of 2 pounds per square foot or greater and a demonstrated Sound Transmission Class (STC) rating of 25 or greater as defined by the American Society for Testing and Materials' Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant. ► A disturbance coordinator will be designated by the project applicant, which will post contact information in a conspicuous location near construction areas so that it is clearly visible to nearby receivers most likely to be disturbed. In addition, mailing of the same information will be sent to nearby receptors and all tribes. The coordinator will manage complaints resulting from the construction noise. Reoccurring disturbances will be evaluated by a qualified acoustical consultant retained by the project applicant to ensure compliance with applicable standards. The disturbance coordinator will contact nearby noise-sensitive receptors, advising them of the construction schedule.		
Impact NOISE-3: Implementation of the proposed project could result in future noise (construction, operations and maintenance, and decommissioning activities) that could result in conflicts with land use compatibility that exceed the County's standards for Places	**Mitigation Measure NOISE-3:** Provided that the proposed project would be required to achieve the normally acceptable exterior noise level standard for places of worship, the following mitigation measure shall be incorporated in the project design: ► Implement all of the mitigation measures outlined for Impact NOISE-1 and Impact NOISE-2;	Significant and Unavoidable	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the Project that substantially lessen this impact's significant effects on the environment. Even with the implementation of the mitigation measures outlined for Impact NOISE-1 and Impact NOISE-2, the proposed project retains the potential to result in significant noise impacts on the Topock Cultural Area. Therefore, the proposed project's noise

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
of Worship or conflict with Native American values associated with the Topock Cultural Area. (FEIR, Volume 2, pp. 4.9-24 - 4.9-25.)	Upon completion of detailed project design, the determination of remediation activities and the schedule established to achieve these activities shall be communicated to Native American tribes. PG&E shall maintain a liaison with requesting Tribes to alert them to project activities that would generate new noise in the Topock Cultural Area on at least an annual basis.		impacts to the Topock Cultural Area are considered significant and unavoidable. DTSC further finds that complete avoidance of direct and indirect noise effects of the project to the Topock Cultural Area is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. DTSC further notes that Mitigation Measure NOISE-3 would achieve the normally acceptable exterior noise level standard for places of worship and provide information to Native American participants on the expected timing of noise-generating project activities, however, the unique values associated with the Topock Cultural Area cannot be reconciled with additional project-related noise (although, in noting this fact, DTSC concurs with the Final EIR's conclusion with respect to the significance of this impact **Overriding Considerations:** The environmental, economic, social and other benefits of the project override the significant adverse impact of the project associated with the proposed project's noise impacts to the Topock Cultural Area, as more fully stated in the Statement of Overriding Considerations. **Facts in Support of Finding:** The proposed project would have a substantial adverse noise impact on the Topock Cultural Area, which is considered a historical resource because of its historic (and continuing) importance to representatives of the Fort Mojave Indian Tribe

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			and certain other Yuman-speaking tribes in the lower Colorado River region. The area in which ground-disturbing activities and facilities would be located has been designed to avoid the NRHP- listed and NRHP- and CRHR-eligible site CA-SBR-219 (Loci A, B, and C, of the Topock Maze), which is an integral part of the Topock Cultural Area, such that no direct physical impacts would occur in these areas. However, because of the introduction of additional infrastructure, ground-disturbing activity, and overall nature of modern intrusions associated with the proposed project, the changes to the character, nature, and use of the historical resource the proposed project would indirectly affect the Topock Maze environment. Such activities would also directly and indirectly adversely affect the Topock Cultural Area as described within the EIR. As discussed further in Section 4.9 of the FEIR, "Noise," the construction of new modern features such as wells and water pipelines would be inconsistent with the setting and auditory characteristics of the Topock Cultural Area that contribute to its historical significance to certain Native American tribes and could be deemed a material alteration of the physical characteristics of the historical area. As expressed by Native American stakeholders during the NACP, numerous project-related and project-induced activities would materially affect the cultural significance of the Topock Cultural Area and affect cultural practices associated with that area. These include:

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			► Construction of wells, pipelines, access roads, and other project facilities would damage the land, plants (including those with ethnobotanical use) and animals, air, water, and other physical features of the Topock Cultural Area, all of which contribute to the cultural significance of the area, which is experienced as a unique and sacred whole. ► Noise generated by the project during construction, operation and decommissioning is out of character and materially affects the cultural values of the Topock Cultural Area. ► Visual intrusions created during the construction, operation and decommission of the project is out of character and materially affects the cultural values of the Topock Cultural Area. These may include the introduction of wells to the floodplain, other landform alteration, or visual impacts associated with fugitive dust. ► Construction, operation and decommissioning of the project may affect native plants that are gathered by Native Americans for economic and traditional purposes. ► The transformation of Cr(VI) to Cr(III) would create an impact to the cultural and historical values associated with the Topock Cultural Area through the deposition of an unnatural amount of Cr(III) into the

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			environment. ► Construction activities are considered "out of character" and could materially affect the cultural functionality of the Topock Cultural Area, for example the role of the area in funerary beliefs and practices. ► Construction activities and increased access roads may induce increased off-highway vehicular traffic in the Topock Cultural Area, which is considered an out of character with the cultural significance and would materially affect the Topock Cultural Area. The only mitigation that would reduce these impacts to a less-than-significant level would be avoidance of any type of project-related activity. While the project-related impacts are significant, it should be noted-that the evidence suggests that the Topock Cultural Area will retain its historical and cultural significance even after the proposed remedy is in operation and completed. Thus, there are mitigation measures that will reduce the level of impact, although not below the level of significance. As noted above Mitigation Measure NOISE-3 would achieve the normally acceptable exterior noise level standard for places of worship and provide information to Native American participants on the expected timing of noise-generating project activities. Complete avoidance, however, of direct and indirect effects of the project, to the Topock Cultural

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			Area and the physical characteristics that convey its historical significance is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. As such, impacts on the TCA as a historical resource would be significant and unavoidable. (FEIR, Volume 2, pp. 4.9-24 - 4.9-25;see also FEIR, Volume 2, pp. 4.4-60 - 4.4-68.)
4.10 Transportation			
None			
4.11 Utilities and Service Systems			
None			
4.12 Water Supply			
Impact WATER-1: While, from a water supply perspective, the consumptive use associated with the project is very small, localized effects on the groundwater table near the freshwater extraction wells are possible. Depending on where the extraction wells are sited, existing nearby supply wells could be adversely affected. (FEIR, Volume 2, pp. 4.12-9 - 4.12-10.)	**Mitigation Measure WATER-1:** To mitigate potentially significant effects on local groundwater levels associated with the freshwater extraction wells, in the event that freshwater is to be supplied from wells rather than from a surface intake, a hydrologic analysis shall be conducted during the design phase of the project to evaluate the proposed pumping rates for extraction, the potential cone of depression, and the extraction effect on any existing wells in proximity. Proximity shall be defined by the cone of depression boundary of any well to be used in the extraction process. Extraction well location and/or extraction rates shall be adjusted during project design based on this analysis to ensure that extraction does not substantially adversely affect the production rates of existing nearby wells (e.g.,	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this potentially significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Implementation of Mitigation Measure WATER-1 would reduce this impact to less than significant because it would reduce the potential for localized changes in groundwater level that would substantially adversely affect wells in the vicinity. (FEIR, Volume 2, pp. 4.12-9 - 4.12-10.)

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
	adversely affect well production such that existing land uses would not be supported). It shall be demonstrated using computer simulations or other appropriate hydrologic analysis that production rates of nearby wells will not be substantially affected before the installation of any new freshwater extraction wells.		
6.0 Cumulative Impacts			
Cumulative Impacts on Aesthetics (6.4.1): The proposed project would have a cumulative impact on views to and from the Topock Maze Locus B. This project would contribute incrementally to the cumulative impacts in the project area that may impact fish and their habitat. This project would contribute incrementally recreational viewers experience of the Colorado River and the associated scenic corridor could be cumulative impacted by the overall change that this and other river development, including the Pirate Cove Resort and Topock Marina Improvements. (FEIR, Volume 2, pp. 6-27 – 6-28.)	**Mitigation Measures AES-1 and AES-2.**	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid this significant cumulative environmental effect as identified in the FEIR. **Facts in Support of Finding:** Mitigation Measure AES-1 includes design criteria to ensure that mature floodplain vegetation is protected and revegetation of disturbed areas occurs to reduce the overall change to the visual character of the view corridor along the Colorado River from the Topock Maze. Mitigation Measure AES-2 includes design requirements to ensure that development and alterations along the Colorado River do not significantly affect views from the Colorado River, or the recreational user's visual experience of the river. This mitigation measure would also address any potential contribution to a cumulative visual impact in consideration of this visual resource. With the implementation of Mitigation Measures AES-1 and AES-2, the project's potential contribution to cumulative aesthetic impacts would be reduced to a less

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			than significant level. (FEIR, Volume 2, pp. 6-27 – 6-28.)
Cumulative Impacts on Air Quality - 6.4.2.1 - Short-Term Construction-Related Impacts (6.4.2.1): The proposed project's construction-generated emissions could contribute on a cumulative basis to pollutant concentrations that exceed the California ambient air quality standards due to other projects in the county. (FEIR, Volume 2, pp. 6-28 – 6-29.)	**Mitigation Measure AIR-1.**	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Because San Bernardino County is currently designated as a nonattainment area for ozone, PM10, and PM2.5, construction-generated emissions could contribute on a cumulative basis to pollutant concentrations that exceed the California ambient air quality standards due to other projects in the county. Project 1D, future soil investigation and remediation at the compressor station, could involve substantial soil remediation activities including soil excavation and grading. Depending on the nature of the implementation and timing of these activities, these actions could contribute substantially to a violation of the ambient air quality standards. Because the details and exact timing of this project is unknown, it is not yet clear whether these types of impacts could occur. If implementation of the soils remediation projects occurred concurrently or without the implementation of measures to reduce construction-related emissions below the MDAQMD's standard, a significant contribution to air quality impacts may occur. Some of these projects, such as the soil investigation and remediation activities (1D), AOC4 (1E), the

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			Topock Marina Improvements (7A), and the cathodic protection system (9A) involve substantial earthmoving activities that may further impact air quality. While unlikely, if significant activities associated with the proposed project and soil remediation activities occurred concurrently, the proposed project may contribute to this potentially significant cumulative effect. However, the proposed project's contribution to this potential effect would not exceed the established thresholds of the MDAQMD which are established in consideration of potential concurrent projects, the project's contribution to this potential cumulative effect is not considered significant. In addition, implementation of Mitigation Measure AIR-1 would further reduce construction-related impacts from emissions of PM10 associated with the proposed project. (FEIR, Volume 2, pp. 6-28 – 6-29.)
Cumulative Impacts on Biological Resources (6.4.3): The proposed project would contribute incrementally to the cumulative loss of sensitive habitats in the project area from this and other projects. The proposed project would contribute incrementally to the cumulative impacts in the project area that may impact fish and their habitat. (FEIR, Volume 2, pp. 6-32 – 6-33.)	**Mitigation Measures BIO-1, BIO-2a, BIO-2b, BIO-2c, BIO-3a, BIO-3b and BIO-3c.**	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Mitigation that has been identified for the proposed project would fully mitigate any loss of habitat (**Mitigation Measures BIO-1, BIO-2a, BIO-2b, and BIO-2c**); thus, the project's contribution to cumulative sensitive habitat impacts is compensated for by project mitigation. Mitigation that has been identified

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			for the proposed project would fully mitigate any loss of fish and fish habitat (**Mitigation Measures BIO-3a** and **BIO-3b**); thus, the project's contribution to cumulative fish and fish habitat impacts is compensated for by project mitigation. (FEIR, Volume 2, pp. 6-32 – 6-33.)
Cumulative Impacts on Cultural Resources (6.4.4): The proposed project would result in cumulatively considerable contribution to a cumulative impact on cultural resources. (FEIR, Volume 2, pp. 6-33 – 6-35.)	**Mitigation Measures CUL-1a-1 through 13, Mitigation Measures CUL-1b/c -1 though CUL-1b/c -4, and Mitigation Measures CUL-2, CUL-3 and CUL-4**	Significant and Unavoidable	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the Project's cumulative impacts on cultural resources. Even with the implementation of the Mitigation Measure Mitigation Measures CUL-1a-1 through 13, Mitigation Measures CUL-1b/c -1 though CUL-1b/c -4, and Mitigation Measures CUL-2, CUL-3 and CUL-4, the proposed project retains the potential to contribute incrementally to these impacts. Therefore, the proposed project's cumulative impacts on cultural resources are considered significant and unavoidable. DTSC further finds that complete avoidance is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. DTSC further notes that the proposed project completely avoids direct effects to the NRHP- listed and NRHP- and CRHR-eligible site CA-SBR-219 (including Loci A, B, and C, of the Topock Maze), such that no direct physical impacts would occur in those areas (although, in noting this fact, DTSC concurs with the Final EIR's conclusion with respect to the significance of this impact). In

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			addition, changes or alterations are within the responsibility of another public agency, BLM, which can and should increase security/law-enforcement resources, post signs, and to oversee and prevent trespassing on Federal lands with the Topock Cultural Area. **Overriding Considerations:** The environmental, economic, social and other benefits of the project override the significant adverse impact of the project associated with the proposed project's cumulative impacts on cultural resources, as more fully stated in the Statement of Overriding Considerations. **Facts in Support of Finding:** Implementation of the proposed project has the potential to impact known and unknown cultural resources as well as known and unknown unique archeological resources, during construction, operations and maintenance, and decommissioning activities. Potential cultural resource impacts could occur to the Topock Cultural Area, some of the approximately 80 identified cultural resources in the project area, and to as-yet-unidentified resources that may exist in unsurveyed areas or in buried contexts. These impacts are considered significant and unavoidable (Topock Cultural Area) or potentially significant (other identified and as yet undiscovered historical resources). Mitigation would reduce impacts through avoidance, monitoring, and standard treatment options for most cultural resources (Measure

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			Mitigation Measures CUL-1a-1 through 13, Mitigation Measures CUL-1b/c -1 though CUL-1b/c -4, and Mitigation Measures CUL-2). However, even with the implementation of mitigation such as provision of access to the tribes and use of previously disturbed areas and existing physical improvements, significant impacts to the Topock Cultural Area and other historical resources within the project area are expected to be significant and unavoidable. As such, the proposed project contributes to this significant and unavoidable cumulative impact. For purposes of this cumulative impact analysis the Topock Cultural Area is considered at the local scale as described above. Project-related impacts on this resource can be reduced through implementation of Measure Mitigation Measures CUL-1a-1 through 13, Mitigation Measures CUL-1b/c -1 though CUL-1b/c -4, and Mitigation Measures CUL-2, but, as discussed in Section 4.4 of the FEIR, Volume 2, and the findings of fact above, cannot be fully mitigated due to the unique characteristics of this historical resource. The Topock Cultural Area has been subjected to many previous impacts, including the introduction of transportation, energy, and recreational facilities, as well as through construction of the IM-3 Facility and associated ground-disturbing activities undertaken in developing the Final Remedy. Implementation of the proposed project could also result in impacts on unique paleontological resources that may occur in certain formations

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			within the project area. Mitigation Measure CUL-3 would reduce these potential impacts to a less-than-significant level through further investigation, monitoring by a qualified paleontologist, and recovery, analysis, and curation of scientifically valuable fossil remains that may be discovered during ground-disturbing activities. Finally, implementation of the proposed project could also result in impacts on human remains, including possible Native American burials and associated grave goods, which may occur in subsurface contexts within the project area. Mitigation Measure CUL-4 would reduce these potential impacts, but because of the unique nature of these resources, this would remain a significant impact even after implementation of this mitigation measure. Depending on the scope and locations of future projects within this region, the potential exists for cumulative impacts to occur with respect to identified and unidentified historical resources within the proposed project area, , and to alter the broader cultural features within the Lower Colorado River Valley. Some of these projects, such as the soil investigation and remediation activities (1D), AOC4 (1E), and the cathodic protection system (9A) involve substantial earthmoving activities that may further impact nearby known cultural resources at or near the station, as well as undocumented cultural resources that may occur in portions of the project area that have not yet been surveyed, or

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			in buried contexts within the project area. As described in the FEIR, there are several other projects that have already been implemented or may occur in the foreseeable future at or near the compressor station that are considered from the perspective of cumulative impacts as it relates to documented prehistoric and historic-era archaeological sites in the project area and surrounding vicinity. More broadly, the Lower Colorado River Valley contains a number of important geoglyphs or other cultural markers that are linked to Native American cultural traditions for tribes located throughout the region. These resources include intaglios, trails, dance paths/circles, dance staging areas, and "avenidas" (wide cleared paths) located throughout the region. Perhaps the most well-known geoglyphs in the region are the Blythe Intaglios, which include an anthropomoprphic and zoomorphic figure. Other intaglios in the Lower Colorado River Valley include the Black Point intaglios and geoglyphs in the Big Maria Mountains. According to certain tribes, the rituals and beliefs surrounding these geoglyph sites are integrated with one another and with the entire river corridor area. The ethnographic information strongly indicates that Yuman religious and cultural beliefs about the creation of the world, the history of Yuman culture, spiritual guidance about proper conduct, and the afterlife incorporate a range of landscape features, geoglyphs, and other cultural markers within this larger area. It has been suggested that the presence of intaglio features along the

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			Colorado River between Pilot Knob and Spirit Mountain (of which the Topock Maze can be included) represents a pilgrimage route followed by Yuman-speakers in prehistory (Earle 2005:38). Depending on the scope and locations of future projects within this region, the potential exists for cumulative impacts to occur with respect to identified and unidentified historical resources within the proposed project area, , and to alter the broader cultural features within the Lower Colorado River Valley. Some of these projects, such as the soil investigation and remediation activities (1D), AOC4 (1E), and the cathodic protection system (9A) involve substantial earthmoving activities that may further impact nearby known cultural resources at or near the station, as well as undocumented cultural resources that may occur in portions of the project area that have not yet been surveyed, or in buried contexts within the project area. The recent past and possible future PG&E projects at the compressor station such as the soil investigation and remediation, as well as the continued Quarry Operations (2C), and the continuing use and improvements at the Moabi Regional Park Improvements (5A), Pirate Cove Resort (5B), and Topock Marina (7A) have the potential to: (1) involve ground disturbing activities that would directly and substantially alter significant historical and paleontological resources; (2) bring additional people (e.g., work crews, residents, tourists) into the area that may

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			result in increased rates of vandalism or off highway vehicle use, resulting in ground disturbance; (3) result in other environmental impacts that may further disrupt the Topock Cultural Area ; and (4) results in other environmental impacts that may disrupt the resources within the Lower Colorado River Valley(e.g., visual, noise, air quality). For example, development projects along the Colorado River (5A, 5B, and 7A) may bring relatively large numbers of new people into the area. Visitors associated with the development along the Colorado River may create ground disturbance or other environmental impacts in the Topock Cultural Area through recreational off-highway vehicle use, off-trail hiking, and loud music. Finally, the recent past and continuing operation of IM-3 (1L) has created an impact on the spiritual and cultural values associated with the Topock Cultural Area, as documented in the Final Settlement Agreement between PG&E and the Fort Mojave Indian Tribe (2006: 5). While mitigation measures would likely be implemented for the other future projects in the area to reduce impacts on historical and paleontological resources, there are no feasible mitigation strategies that would reduce impacts on the Topock Cultural Area. Therefore, implementation of the proposed project would have significant impacts on this historical resource, and other projects could contribute incrementally to these impacts. The proposed

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			project would result in cumulatively considerable contribution to a cumulative impact on cultural resources. The only method to fully addresses these impacts is total avoidance of any future activity; therefore, no feasible mitigation exists that would reduce this impact below the level of significance. However, significant impacts can be reduced by implementation of the measures described in Section 4.4 of the FEIR, Volume 2, and above. (FEIR, Volume 2, pp. 6-33 – 6-35; see also Errata attached as Exhibit 1 to the Resolution Certifying the FEIR.) Mitigation Measure CUL-1a was adopted by DTSC to address this issue to the extent of its authority to impose mitigation relating to this issue. Adoption of additional mitigation that could potentially substantially lessen this significant impact are within the responsibility of another public agency, BLM, which can and should increase security/law-enforcement resources, post signs, and to oversee and prevent trespassing on Federal lands with the Topock Cultural Area. DTSC finds consistent with CEQA that the proposed mitigation is within the responsibility and jurisdiction of another public agency (BLM) and should be adopted by that other agency. (Public Resources Code Section 21081, subd (a); see also CEQA Guidelines Sections 15091, subd. (a).)
Cumulative Impacts on Geology and Soils (6.4.5): The proposed project may incrementally contribute to	**Mitigation Measures GEO-1a and GEO-1b.**	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect as identified in

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
cumulative impacts to soil erosion in the project area. (FEIR, Volume 2, pp. 6-35 – 6-36.)			the FEIR. **Facts in Support of Finding:** Other projects that are likely to occur in the project area (1A, 1B, 1D, 1E, 1M, 7A, and 9A), in particular project 1D, and 1E would potential result in substantial earthmoving activity as it relates to soil remediation and investigation activities, and would contribute to a significant cumulative impact to soil erosion in the project area. The proposed project also has the potential to result in increased soil erosion from wind and water during construction activities. The magnitude of this potential impact would be reduced by implementation of Mitigation Measure GEO-1a, which would include grading and erosion control plans, a stormwater pollution prevention plan, and consistency with local policies. These are standard requirements for construction sites and would be required for all other projects that would be located in the project area. Although the project may contribute incrementally to cumulative erosion impacts, adherence to standard construction practices and requirements would limit the magnitude of cumulative impacts from this project and other future projects. Project impacts involving differential compaction of soils and potential alterations of drainage patterns and erosion have been identified. This potential impact would be mitigated to less-than-significant levels through the implementation of Mitigation Measure

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			GEO-1b. Considering the other projects that may be implemented at the compressor station, there is the potential for cumulative impacts to occur when the various PG&E projects are considered from a cumulative perspective. However, each of these individual projects would likely require implementation of similar measures and would be required to be in compliance with county standards, thereby reducing the potential for these potential impacts to be significant from a cumulative perspective. With implementation of project-specific Mitigation Measures GEO-1a and GEO-1b, the proposed project's contribution to the overall cumulative effect would be reduced. Therefore, cumulative impacts related to differential compaction of soils and potential alterations of drainage patterns and erosion would be less than significant. The project would not cause any impacts related to expansive or unstable soils or subsidence and would therefore not contribute to any cumulative impacts. (FEIR, Volume 2, pp. 6-35 – 6-36.)
Cumulative Impacts Involving Hazardous Materials (6.4.6): The proposed project may incrementally contribute to cumulative impacts involving hazardous waste. (FEIR, Volume 2, pp. 6-36 – 6-37.)	**Mitigation Measures HAZ-1, HAZ-2, and HAZ-3.**	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** Potentially significant impacts involving localized exposure to hazardous materials during activities during construction and decommissioning activities

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			could result in localized hazardous material spills or incidents. All phases of the proposed project could also result in the reasonably foreseeable releases of chemicals associated with excavated or disturbed soils. These impacts are also considered localized, and Mitigation Measures HAZ-1, HAZ-2, and HAZ-3 would reduce these impacts to less than significant. All of these impacts are considered localized and would not contribute to other cumulative projects in the region. Of particular note are the proposed PG&E projects which involve compressor station refurbishment and remediation of soil contamination. If these projects are to occur within a similar time frame as the proposed project, the potential for hazardous materials releases during these activities would increase. However, Mitigation Measures HAZ-1, HAZ-2, and HAZ-3, as well as future site-specific health and safety precautions associated with the other likely projects, would reduce their impacts. Therefore, the proposed project would not have a considerable contribution to significant impacts related to hazardous materials, and impacts would be less than significant. Some of the other projects considered as part of this cumulative analysis would also have the potential to generate hazardous materials during construction. However, these projects would be required to comply with existing regulations that are designed to limit these kinds of impacts. Other projects on the compressor station and the

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			improvement project at Moabi Regional Park have the potential to expose workers to hazardous materials because of their known presence at these two locations. These projects would require similar mitigation in the form of implementing health and safety plans that have the overall purpose of limiting the potential for exposure. Lastly, during construction activities and potentially during operations and maintenance and decommissioning activities (when applicable), there is also a similar potential for the spill and release of hazardous materials during project implementation. Although implementation of this project may incrementally contribute to cumulative impacts involving hazardous waste, the contribution would not be cumulatively considerable. Standard mitigation measures and practices required within the context of existing laws and regulations would individually limit these impacts for each project and minimize any potential for significant cumulative impacts. (FEIR, Volume 2, pp. 6-36 – 6-37.)
Cumulative Impacts on Hydrology and Water Quality (6.4.7): The proposed project may contribute incrementally to water quality impacts. (FEIR, Volume 2, p. 6-37.)	**Mitigation Measures GEO-1a and GEO-1b.**	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** The area around the compressor station is drained by a network of ephemeral washes that eventually flow into the Colorado River to the east of the project

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			area. With respect to evaluating surface water quality and hydrology impacts, the PG&E projects (1A, 1B, 1D, and 1E, and 1M), the Quarry Operations (2C), the Topock Marina Improvements (7A), and the cathodic protection system (9A) are relevant to the cumulative analysis because they are located within the same drainage area. Impacts related to water quality from all phases of the proposed project could occur. Best management practices (BMPs) have been identified in Mitigation Measures HYDRO-1, HYDRO-2, and HYDRO-3, which would reduce impacts related to water quality to less than significant. The relevant cumulative projects described previously that would involve construction and operational activities that could have similar water resources impacts. The BMPs described in the impact analysis for this project would likely be similarly required as mitigation for water quality impacts for each of these other respective projects. Although it is possible than two or more of these projects may occur simultaneously, it is likely that these other projects may occur independently of one another and thus avoid the potential for compounding effects from simultaneous construction projects in the same area. For this reason, the proposed project may contribute incrementally to water quality impacts during the construction phase, but this impact is not cumulatively considerable. (FEIR, Volume 2, p. 6-37.)
Cumulative Impacts on Noise (6.4.9): The proposed	**Mitigation Measures GEO-1a and GEO-1b.**	Significant and Unavoidable	**Finding:** DTSC finds that changes or alterations have been required in, or

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
project could have a cumulative impact to sensitive noise receptors. (FEIR, Volume 2, p. 6-38.)			incorporated into, the Project that substantially lessen the project's cumulative impact to sensitive noise receptors. Even with the implementation of the mitigation measures outlined for Impact NOISE-1 and Impact NOISE-2, the proposed project retains the potential to contribute incrementally to significant noise impacts on the Topock Cultural Area. Therefore, the proposed project's cumulative noise impacts to the Topock Cultural Area are considered significant and unavoidable. DTSC further finds that complete avoidance of cumulative noise effects of the project to the Topock Cultural Area is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. **Overriding Considerations:** The environmental, economic, social and other benefits of the project override the significant adverse impact of the project associated with the proposed project's cumulative noise impacts to the Topock Cultural Area, as more fully stated in the Statement of Overriding. **Facts in Support of Finding:** The proposed project would have a potentially substantial adverse cumulative noise impact on the Topock Cultural Area, which is considered a historical resource because of its historic (and continuing) importance to representatives of the Fort Mojave Indian Tribe and certain other Yuman-speaking tribes in the lower Colorado River region as discussed in the cultural resources findings

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			above. From Table 6-3 of the FEIR, Volume 2,, projects that would be situated in the vicinity of the compressor station are evaluated as part of the cumulative noise analysis. This includes PG&E projects at the station (1A, 1B, 1D, and 1E), Quarry Operations (2C), and the improvements projects at Moabi Regional Park Improvements (5A), Topock Marina (7A), Pirate Cove Resort (5B), and the cathodic protection system (9A). These projects all have the potential to generate noise in the vicinity of the compressor station. However, measures would be in place for these projects to reduce impacts on a project-by-project basis such that noise remains localized and reduced to sensitive receptors. The noise analysis for the proposed project indicates that significant noise impacts would result from construction, operations and maintenance, and decommissioning. Mitigation Measures NOISE-1 and NOISE-2 have been identified that would reduce these impacts to a less-than-significant level. In addition, the proposed project would generate noise that could expose the Topock Cultural Area (a place of worship for Native Americans) to levels that exceed the County's standards or would conflict with Native American values associated with this resource. Mitigation Measures NOISE-3 would reduce, but not completely avoid, impacts to this receptor, and impacts would remain significant and unavoidable.

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			The project site is located in an area that contains multiple noise sources, I-40 and the railroad in particular, that affect sensitive noise receptors in the area. Implementation of the proposed project has the potential to contribute to cumulative noise levels, when combined with the noise generated by other unrelated projects in this area. Projects at the compressor station will likely generate noise during construction, operations and maintenance, and decommissioning activities that may be comparable to the proposed project in magnitude. Depending on the timing for the implementation of these projects and the final form the projects take, these projects may have a significant cumulative noise impact on sensitive receptors in this area, depending on the effectiveness of noise mitigation measures and whether the projects are implemented concurrently. It is possible that the proposed project, if operating concurrently with other projects, could have a cumulative impact to sensitive noise receptors. However, mitigation measures proposed for the proposed project, as well as any other future activities at the project area related to future PG&E projects, would be reduced to less than significant through the implementation of mitigation measures. The only mitigation that would reduce these impacts to a less-than-significant level would be avoidance of any type of project-related activity. While the project-related impacts are significant, it should be noted-that the evidence suggests that the Topock Cultural Area will retain its

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			historical and cultural significance even after the proposed remedy is in operation and completed. Thus, there are mitigation measures that will reduce the level of impact, although not below the level of significance. As noted above Mitigation Measure NOISE-3 would achieve the normally acceptable exterior noise level standard for places of worship and provide information to Native American participants on the expected timing of noise-generating project activities. Complete avoidance, however, of direct and indirect effects of the project, to the Topock Cultural Area and the physical characteristics that convey its historical significance is not feasible. This is because of the fundamental project objective of having an active remediation system to clean up the contaminated groundwater plume. As such, this impact would be significant and unavoidable. (FEIR, Volume 2, p. 38; see also FEIR, Volume 2, pp. 4.9-24 - 4.9-25, 4.4-60 - 4.4-68.)
Cumulative Impacts on Water Supply (6.4.12): The proposed project may contribute incrementally to water supply impacts. (FEIR, Volume 2, p. 6-42.)	**Mitigation Measures GEO-1a and GEO-1b.**	Less than Significant	**Finding:** DTSC finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect as identified in the FEIR. **Facts in Support of Finding:** The Colorado River system is currently experiencing a multiyear drought and is facing increasing demands in managing the river for water supplies, power generation, and environmental

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			protection. The effects of climate change will likely exacerbate the major challenges facing the river system. Stakeholders are actively seeking ways to address these challenges and Reclamation has developed interim guidelines for shortages and coordinated operation of reservoirs. Nonetheless, there will likely be a significant adverse cumulative effect on Colorado River water supply as a result of past, current, and future projects associated with those in Table 6-3 as well as overall growth projections outlined in Table 6-2, without consideration of the proposed project. Implementation of the proposed project would require relatively modest amounts of water during the construction and decommissioning phases, and a negligible amount of water during operations. As a result of the decommissioning of the IM-3 Facility (1L), the project would result in a net reduction in water use compared to existing conditions. All of this water use is well within PG&E's existing (Lower Colorado River Water Supply Project) contracted entitlement of 422 acre-feet annually. Because the project does not require substantial amounts of water and would not generate a demand for water that exceeds existing entitlements, the project does not make a considerable contribution to cumulative impacts on water supply. While, from a water supply perspective, the consumptive use associated with the project is very small, localized effects on the groundwater table near the freshwater extraction wells are possible. Depending on how the

Table of Significant Impacts, Mitigation Measures, and CEQA Findings of Fact

Significant Environmental Impact	Mitigation Measure	Level of Significance After Mitigation	Findings of Fact
			extraction wells are sited, existing nearby supply wells could be adversely affected. Mitigation Measure WATER-1 would require a hydrologic analysis during the design phase of the project to evaluate the proposed pumping rates for extraction, the potential cone of depression, and the extraction effect on any existing wells in proximity. With implementation of Mitigation Measure WATER-1, the project's potential contribution to cumulative localized effects on the groundwater would be reduced to a less–than-significant level. (FEIR, Volume 2, p. 6-42.)