

PUBLIC UTILITIES COMMISSION

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October 8, 2014

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Pacific Gas & Electric
Environmental Management - Transmission
245 Market Street, N10A
San Francisco, CA 94105

RE: Embarcadero-Potrero 230 kV Transmission Project (E-P): Notice to Proceed #3

Dear Mr. Donovan,

On September 18, 2014, Pacific Gas and Electric Company (PG&E) submitted a Notice to Proceed request to the California Public Utilities Commission (CPUC) for the duct bank and vault installation component of the Embarcadero-Potrero 230 kV Transmission Project between the horizontal directional drill (HDD) transition on Spear Street to the Embarcadero Substation on Folsom Street in the northern section, and between the HDD transition on 23rd Street to the Potrero Switchyard in the southern section, in the City of San Francisco, San Francisco County, California.

The PG&E Embarcadero – Potrero 230 kV Transmission Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures and applicant-proposed measures (APMs) described in the Final Mitigated Negative Declaration (MND) were adopted by the CPUC as conditions of project approvals. The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Embarcadero – Potrero 230 kV Transmission Project during implementation. The CPUC voted on January 16, 2014 to approve the Final MND for the PG&E Embarcadero – Potrero 230 kV Transmission Project (Decision D.14-01-007) and a Notice of Determination was submitted to the State Clearinghouse (SCH#2013082047).

The Embarcadero – Potrero Project will be constructed in 5 phases and NTPs will be issued for each phase. This is a typical process for transmission line projects. Given that the Embarcadero – Potrero Project has been approved by the CPUC, as described above, this phased construction review process allows PG&E to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

This letter documents the CPUC's thorough evaluation of all activities covered in this NTP, including the mitigation compliance table provided with the subject NTPR. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision.

NTP #3 for the underground duct bank and vault component of the Embarcadero- Potrero 230 kV Transmission Project is granted by the CPUC based on the factors described below.

PG&E NTP Request

The CPUC has carefully reviewed the NTP request (NTPR) submitted by PG&E, and verified that it incorporates compliance with all applicable mitigation measures and APMs. Excerpts from the PG&E NTPR dated September 18, 2014 are presented as follows (indented):

As previously discussed with CPUC, PG&E intends to construct the project in several phases to coincide with construction phasing, environmental restrictions, and implementation of the pre-construction mitigation measures. This third Notice to Proceed (NTP #3) is being sought for implementation of the duct bank and vault installation work along Spear and Folsom Street in the northern section between the HDD transition and Embarcadero Substation, and 23rd Street/NRG Property for the southern underground section between the HDD transition and Potrero Switchyard. Work areas for the duct bank and vaults are shown on the drawings sent September 17th. Activities will include site preparation, excavation within the streets for duct bank and vaults, traffic control, pulling and splicing of cable, termination, and testing. For excavation, PG&E will provide the CPUC with landfill manifests for all soil, materials, and debris taken off site.

Duct bank and vault related activities are as described in the MND pages 4-46 to 4-55. Installation of the underground transmission line, duct banks, and splice vaults would be completed using an open trench along the majority of the route. The major underground construction activities would include vault installation, trenching and duct bank installation, and finally, cable installation. No complete long-term road closures would be expected during trenching, although one-way traffic controls as well as short-term road closures up to 1,500 feet would be necessary to allow for certain construction activities and to maintain public safety. City, Port, Caltrans and SFMTA permits will be required for this work.

The following lists the expected major equipment for the vault and duct bank installations in the northern and the southern work areas (Underground Construction, Inc. – Civil Support Contractor):

- John Deere 410 Backhoe
- Breaker for Backhoe
- 225, 135, and 85 Excavators
- 3000 gal Vac Truck
- 85 cfm Air Compressor
- 10 wheel dump truck
- 5 CY dump truck
- Contractor pick-up trucks/SUVs
- Employee vehicles
- Tractor with low-bed trailer
- Pipe trailer
- 928 loader
- 75 kWA generator
- 15-30 kWA Generator
- Light Plant
- Pipe Fusion Machine
- Arrow Board
- Steel Trench Plates
- Speed Shoring
- Plate Compactors
- Misc tools

The already [CPUC] approved Amador yard will be used as a typical construction laydown area for storage of equipment and materials related to the duct bank work. Equipment would include items such as excavators, backhoes, support equipment, pickup trucks, and traffic control devices; materials will include pipe, shoring materials, and other

items that may be needed during construction. Laydown area will be needed since equipment and materials will not be able to be left within public right-of-way at end of work shift.

CPUC Evaluation of Preconstruction Mitigation Implementation

All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. For biological resources, those additional conditions are discussed and defined in this section. The Compliance Status Table in PG&E's NTPR provides preconstruction compliance information for the other issue areas addressed by the Embarcadero – Potrero MND.

Following the discussion of biological, cultural, paleontological, water resources, land use/sensitive receptors, a list of bulleted conditions is presented to define additional information and clarifications regarding outstanding requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions. In these cases, the conditions will not appear in the NTPR mitigation compliance table.

Biological Resources: The northern duct bank and vault locations are entirely in City streets (Spear Street and Folsom Street) and the surrounding area is entirely paved. There are large, mature trees that may provide nesting habitat for many species of urban birds and possibly also roosting habitat for bats.

The southern duct bank and vault locations are entirely in the City street (23rd Street) and the surrounding area is entirely paved. Vegetation in this area is largely limited to ornamental shrubs and trees around Potrero Switchyard. There is no tree trimming or removal planned in this portion of the Project area.

There are no wetlands along the Project route. The nearest known wetland is near Pier 96, about 0.5 miles south of Potrero Switchyard (SF Planning Dept., 2011).

The two proposed duct bank and vault locations and the surrounding areas are highly urbanized and largely paved (Aspen 2013, MND 5-50). Nesting bird surveys will be conducted between February 15 and August 31. All construction personnel will receive biological resource training prior to starting work.

Cultural: A records search for information was performed at the Northwest Information Center (NWIC) and the California Historical Resources Information System (CHRIS) on April 20, 2012. The records search conducted for the proposed route centered on the alignment and included a one-quarter mile buffer on either side. The records search included a review of base maps and resource records on file at the NWIC, as well as the California Office of Historic Preservation (OHP) listings of significant resources. A search of the Sacred Lands Files maintained by the Native American Heritage Commission (NAHC) was requested on June 27, 2012 and again on July 6, 2012. In its response, the NAHC noted that a search of the Sacred Lands Files failed to indicate the presence of Native American cultural resources in the immediate Project area, and provided a list of recommended contacts that may have additional information concerning archaeological sites or traditional cultural properties near the Project area.

Geoarchaeologists from Far Western Anthropological Research Group have developed a model of buried-site sensitivity for much of California (Meyer, 2011; Meyer and Rosenthal, 2007 and 2008; Meyer et al., 2010 and 2011; Rosenthal and Meyer 2004). This model is based on an analysis of the relationship between late Quaternary landscape evolution and the structure and visibility of the archaeological record. The age surface landforms can be mapped using soils surveys developed by the Natural Resources Conservation Service. The

potential for buried prehistoric sites to occur in the Project area was determined using landform ages, the age and distribution of known archaeological deposits, and the proximity to natural streams and the prehistoric shoreline of San Francisco Bay (i.e., distance to water). Sensitivity for historical-era buried resources was characterized by determining the location, age and depth of historical fill, considering the location of known below-ground historical resources and researching the patterns of historical development and redevelopment in the area.

Intensive pedestrian archaeological and historical architectural surveys of the Area of Potential Effects (APE) were completed on June 28, 2012. A maritime archaeologist reviewed the Project studies, reports, and a marine geophysical survey, as well as digital geophysical datasets to determine the presence of submerged cultural resources, primarily shipwrecks (Aspen 2013, MND 5-79 - 5-81).

The records search for prehistoric resources within ¼ mile (~1,320 feet) of the proposed route identified one dual-component site (P-38-004326, CA-SFR-151/H), located about 1/8 mile from the Embarcadero Substation at the north end of the Proposed Project. The prehistoric component of the site consists of a buried deposit located 11.5 feet below the ground surface that was carbon dated to between 1,000 and 2,000 years before present (Kaijankoski, 2008). The records search identified five previously recorded historic sites (including the above dual-component site) and three reported but not formally recorded sites within the records search area. Six of these resources (P-38-104, -120, -4325, -4326, -4884, and the Wirth Site) are located within ¼ mile of the northern overland portion of the Project; two (former Mirant site and Station A Foundations) are within ¼ mile of the southern overland portion of the Project (Aspen 2013, MND 5-85).

An archaeologist will be on site during all ground disturbing work. All construction personnel will receive cultural resource training prior to starting work. In the event that an unanticipated discovery of cultural materials is made within the HDD sites, the find shall be managed in compliance with the *Archaeological Monitoring and Inadvertent Discovery Plan for the Potrero Portion of the Embarcadero-Potrero 230 kV Transmission Project, City of San Francisco, California* (July 2014 FINAL), prepared by Far Western Anthropological Research Group, Inc.

Paleontological Resources: Published and available unpublished geological and paleontological literature was reviewed to develop a baseline paleontological resource inventory of the Project area, and to assess the potential paleontological productivity of the stratigraphic units that may be affected by the Project. Sources included geological maps, paleontological and geological reports, and available electronic databases. A paleontological resources record review was conducted for the Project on May 12, 2012 using the online database maintained by the University of California at Berkeley Museum of Paleontology (UCMP). Geologic mapping by Schlocker (1974) was used to determine the underlying geology for each of the Project components.

Both the northern and southern duct bank and vaults alignment would go through portions of the Pleistocene Colma Formation. The Colma Formation, formed under shallow marine and subaerial dune and fluvial conditions during the late Pleistocene (between 70,000 and 130,000 years ago) typically consists of weakly consolidated and friable sand with some sandy silt, clay, and gravel (Schlocker, 1974). Although the UCMP database contains no fossil localities from the Colma Formation within San Francisco County, the literature indicates that the Pleistocene Colma Formation has produced significant marine and terrestrial fossils, particularly within the City of San Francisco. The Colma Formation is assigned moderate paleontological sensitivity. (Aspen 2013, MND 5-87 – 5-89). All construction personnel will receive paleontological resource training prior to starting work.

Water Resources. PG&E has prepared an Erosion and Sediment Control Plan as part of a Stormwater Pollution Prevention Plan (SWPPP), which was approved by the San Francisco Public Utilities Commission on August 13, 2014. The Regional Water Quality Control Board has issued a Waste Discharge Identification (WDID) number for the Project (WDID# 2 38C370601). Erosion control and pollution prevention measures in the SWPPP address elements such as track-out controls, stock-pile handling, dewatering discharge, drain inlet protection, and replacement of any disturbed pavement or landscaping.

Sensitive Land Uses/Noise. At the northern duct bank and vaults location, there are commercial and residential uses, apartment and condominium towers along Folsom Street, and the Marin Day School Hills Plaza Campus is located at the corner of Spear and Harrison. At the southern duct bank and vaults location, adjacent land uses include commercial facilities, a storage facility, and the Trans Bay Cable facility (Aspen 2013, MND 5-175). Construction notifications were provided to the public with tips on reducing noise intrusion, for example, by closing windows facing the planned construction. PG&E has also specified construction noise reduction measures that require the contractor to ensure all equipment is in good working order, adequately muffled, and maintained in accordance with the manufacturers' recommendations.

Utilities and Service Systems. Applicant Proposed Mitigation (APM) UTIL-1 requires coordination with the SFPUC regarding stormwater system facilities in the northern segment of the project near the Embarcadero. PG&E has conducted this coordination regarding avoidance of these facilities and will continue to coordinate with the SFPUC as construction commences. Mitigation Measure (MM) UT-1 requires that underground utilities be protected and that PG&E coordinate with utility owners. PG&E has coordinated with all potentially impacted utility owners and will continue to do so as construction commences.

Conditions of NTP Approval

The conditions noted below shall be met by PG&E and its contractors:

- All applicable Project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this NTP #3 shall be available on site for the duration of construction activities.
- Conduct biological monitoring in compliance with APM BIO-1, and monitor for compliance with all APMs and MMs during active use of the subject site.
- In accordance with Mitigation Measure B-4, between February 15 and August 31, a preconstruction survey shall be conducted within 7 days prior to the start of noise-generating construction or vegetation trimming or removal activities in any new work area. Bird nesting survey sweeps shall occur on a regular basis during the nesting season, as deemed appropriate by the level of nesting activity. If an active bird nest for a species covered by the Migratory Bird Treaty Act or California Fish and Game Code is found within 50 feet of Project work areas, the qualified biologist shall determine appropriate protective measures to reduce the likelihood of nest failure. If an active nest for a special-status bird is found, PG&E shall record the position of the nest in the monitoring report and notify the CPUC. The qualified biologist shall implement buffers and set other protective measures, as appropriate, to protect special-status nesting birds from construction activities in consultation with CPUC, and as appropriate the California Department of Fish and Wildlife (CDFW) and/or United States Fish and Wildlife Service (USFWS). The Biological Monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. Requests for buffers

of less than 50 feet for special-status nesting birds must be submitted to the CPUC's independent biologist(s) for review.

- Prior to the start of construction, PG&E shall submit to the CPUC the signed and approved San Francisco Port permit for 23rd Street applicable for this NTP #3.
- Prior to the start of construction, PG&E shall submit to the CPUC the City of San Francisco approved Traffic Control Plan for Spear Street applicable for this NTP #3.
- Prior to the start of excavation, PG&E shall submit to the CPUC the City of San Francisco approval regarding the Maher Ordinance (APM HM-3).
- All crew members shall be Worker Environmental Awareness Program (WEAP) trained prior to working on the Project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the WEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
- In the case of an unanticipated cultural resources discovery, the CPUC Environmental Monitor (EM) shall be notified immediately and the find shall be managed in compliance with the *Archaeological Monitoring and Inadvertent Discovery Plan for the Potrero Portion of the Embarcadero-Potrero 230 kV Transmission Project, City of San Francisco, California* (July 2014 FINAL), prepared by Far Western Anthropological Research Group, Inc.
- The SFPUC approved Erosion and Sediment Control Plan and the Stormwater Pollution Prevention Plan shall be implemented during all construction activities.
- Per APM WQ-1, where construction activities occur near a surface water body or drainage channel, the staging of construction materials and equipment and excavation spoil stockpiles will be placed at least 50 feet from the water body and properly contained, such as with berms and/or covers, to minimize risk of sediment transport to the drainage. Any surplus soil will be transported from the site and appropriately disposed of.
- If groundwater is encountered, PG&E shall contain, test, and submit the results to the CPUC prior to proper disposal.
- In accordance with MM N-2, prior to any nighttime or 24-hour activity, PG&E shall obtain a special permit from the San Francisco Public Works Department and provide it to the CPUC, as well as the results of actual ambient hourly noise measurements.
- As proposed in APM LU-1, a public liaison representative shall provide the public with advance notification of construction activities, between two and four weeks prior to construction. PG&E shall also publish a notice of impending construction in local newspapers, stating when and where construction will occur. All construction activities shall be coordinated with the City and Port of San Francisco at least 30 days before construction begins in these areas.
- Per MM AQ-1 Minimize Fugitive Dust, a publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person will respond and take corrective action

within 48 hours. The Bay Area Air Quality Management District (BAAQMD) phone number will also be visible to ensure compliance with applicable regulations.

- All complaints received by PG&E in regard to the Project shall be logged and reported immediately to the CPUC. This includes complaints relevant to noise, dust, etc. Complaints shall also be forwarded to the City of San Francisco. If complaints cannot be resolved, activities at the site may need to be modified and/or sound attenuation devices may be to be installed, etc., depending on the nature of the complaint.
- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Minor Project Change Request shall be submitted for CPUC review.
- If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC EM shall be notified immediately.

Sincerely,



Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen