Variance Request Form

PG&E Hollister 115 kV Power Line Reconductoring Project

Variance Request No.: 25

CONTRACTOR SECTION

Request Prepared By: Pacific Gas and Electric Company (PG&E)

Landowners:
Granite Rock Company; Brookhollow Ranch; properties are encumbered by easements to access, maintain and operate the power line.

Current Land Use: Agriculture, range land, primarily cattle grazing

Photos? ☒ Yes ☐ ☒ No

Attachments? ☒ Yes No

- Attachment A: Variance 25 Map
- Attachment B: Variance 25 Photographs

Permit Measure or Specification:

- California Public Utilities Commission (CPUC) Mitigated Negative Declaration (MND) Project Description
  - Deviation from the project description to reclassify ~~a portion of~~ portions of the access roads between Pole 18/13 and Pole 18/14.~~one access road from overland travel route to existing road – needs improvements~~.

Detailed Description of Variance:

As construction has progressed, it has become apparent to PG&E and its contractors that the overland travel route between Pole 18/13 and 18/14 is too steep to be safely traversed with heavy equipment. PG&E is requesting authorization from the CPUC to reclassify ~~portions of~~ the existing overland travel route to "existing road" and "existing road – needs improvement", and to subsequently improve approximately 150 feet of the road~~overland travel route~~ to allow for safe use by heavy equipment. The grading would involve use of a backhoe to cut the steeper portions of the road~~ute~~ and add fill to the flatter portions, reducing the overall grade of that portion of the road~~ute~~. The road~~ute~~ would be watered and driven over to help compact the graded portions before use by PG&E crews. The cut and fill would be balanced onsite within the area of improvements shown in Attachment A: Variance 25 Map. The existing conditions are depicted in Attachment B: Variance 25 Photographs. No material would be imported. The road improvements would be revegetated in accordance with the project's Habitat Mitigation Plan at the conclusion of construction. If these changes are approved, the proposed culvert located between Pole 18/13 and 18/14 and a portion of the proposed "new road" that would cross the culvert would no longer be necessary. In addition, the remainder of the "new road" would be reclassified as an overland travel route to reflect current conditions. These changes are also reflected on Attachment A: Variance 25 Map.

It should be noted that this ~~entire overland travel~~ route between Poles 18/14 and 18/13 was originally identified as an "existing road – needs improvement" in Figure 2-2g in the MND. It was subsequently reclassified in Variance Request #19 as an "overland travel route" because portions of the road were incorrectly mapped, and limited use of the road by landowners made the original alignment difficult to determine. This variance request would return some of the route to its original MND designation.

Table 1: Access Roads~~Table 1: Access Roads~~, provides a summary of the miles of access roads from the MND and previously approved variances, and the changes resulting from the reclassification. Attachment A: Variance 25 Map depicts the location of the reclassification.

Table 1: Access Roads

Type of Access	MND and Previously Approved Variances (miles)	Variance Request #25 (miles)	Total (miles)
Existing Road	18.26	0.090	18.3526
Existing Road – Needs Improvement	1.79	0.03	1.82
New Road	0.32	(0.06)0	0.2632
Overland Travel Route	7.54	(0.0803)	7.4651
All-Terrain Vehicles (ATV) Overland Access Route	1.20	0.00	1.20
Total	**29.11**	**(0.02)0**	**29.0911**

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Variance Justification:

PG&E is requesting this variance because short portions of the ~~overland travel route~~existing road are too steep for heavy machinery to traverse safely. As described in the resource evaluation section below, because this reclassification is consistent with the classification originally-evaluated in the MND for the project, potential impacts associated with this variance are consistent with those evaluated during the CEQA review and will not result in any new significant impacts that were not previously identified. Environmental protection measures will be implemented as described in the MND and other project permits.

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PG&E ENVIRONMENTAL SECTION

RESOURCE EVALUATION

The proposed variance was analyzed to verify that the project change would not introduce new significant impacts and that any potential impacts were fully analyzed in the MND. The following table provides a brief summary of each resource area analyzed in the MND.

CEQA SECTION	Applicable	(Y) Define Potential Impact or (N) Briefly Explain Why CEQA Section is Not Applicable
Aesthetics	☒ Y ☐ N	*No Change.* No new sources of light or glare will be introduced to the area from the improvements proposed. The route is already in use, and this variance will not increase traffic beyond the 200 construction-related vehicle trips per day analyzed in the MND. The improvements will not substantially degrade the quality of the site and its surroundings because views of the trucks will be of short duration, and construction is relatively short term. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create significant additional impacts to aesthetics.
Agriculture and Forestry Resources	☒ Y ☐N	*No Change.* The route does not traverse Important Farmland, but does traverse grazing land. The improvements will not significantly impact agricultural activities because the route is already in use, is relatively short term, and will not convert agricultural land to non-agricultural use. Use of the routes will not result in impacts to forestry resources because it will not require additional tree trimming or removal. Use of the road will not conflict with Williamson Act contracts or existing zoning because it will not result in any changes to existing land uses. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create significant additional impacts to agriculture or forestry resources.
Air Quality and Greenhouse Gas Emissions	☒ Y ☐N	*No Change.* The improvements will not require additional trips; therefore, traffic will not increase beyond the estimated 200 construction-related vehicle trips per day that were analyzed in the MND. In addition, the improvements will not significantly increase the amount or use of heavy equipment on the project and, therefore, will not increase emissions or fugitive dust, beyond what was analyzed in the MND. These routes will not be closer to residences or sensitive receptors; therefore, pollutant concentrations and objectionable odors will not increase beyond those described in the MND. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create significant additional impacts to air quality or greenhouse gas emissions.

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Biological Resources	☒ Y ☐ N	*No Change.* The MND evaluated the project areas and a 500-foot buffer for special status wildlife species. The improvements proposed are located on an existing, approved, overland travel route within the 500-foot survey buffer and were, therefore, evaluated in the MND. The proposed improvements are not located within any CDFG, RWQCB or USACE jurisdictional areas. In accordance with Applicant-Proposed Measures (APMs) and mitigation measures in the MND, pre-construction wildlife surveys for burrowing owl (BUOW), American badger (AMBA), and San Joaquin kit fox (SJKF) were conducted in this area within 30 days prior to construction occurring at Poles 18/14 and 18/13. A report describing the survey results was previously submitted to the CPUC. The overland travel route has already been used by the project for use by light and medium-duty equipment. In addition, surveys for California tiger salamander (CTS), and California red-legged frog (CRLF), and nesting birds will be conducted immediately prior to construction for any access roads requiring ground disturbance. If any special-status species or nesting birds are observed, the appropriate and required measures, including construction buffers will be implemented as described in the MND and project permits. The improvements will not require any additional tree trimming or removal beyond what was analyzed in the MND. Environmental protection measures will be implemented as described in the MND and other project permits. Therefore, potential impacts to biological resources associated with this variance are consistent with those evaluated in the MND, and the improvements and reclassification will not create significant additional impacts to biological resources.
Cultural Resources	☒ Y ☐ N	*No Change.* PG&E prepared a Historic Properties Inventory Report, which included an evaluation of cultural resources in the project area and a 500-foot buffer. The overland travel route and the proposed improvements are located within the 500-foot survey buffer and were, therefore, included in the evaluation. No ground disturbance is anticipated to occur in areas of high archaeological sensitivity, and no impacts to cultural resources are anticipated. Environmental protection measures will be implemented as described in the MND and other project permits. Therefore, potential impacts to cultural resources associated with this variance are consistent with those evaluated in the MND, and the proposed improvements and reclassification will not create significant additional impacts to cultural resources.
Geology, Soils, and Seismicity	☒ Y ☐N	*No Change.* The improvements proposed are limited in scale and scope. The locations were included in the evaluation of geology, soils, and seismicity in the project area, and will not result in new geology, soils, or seismicity impacts. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND. The proposed improvements and reclassification of original routes will not create significant additional geology, soils, or seismicity impacts.
Hazards and Hazardous Materials	☒ Y ☐ N	*No Change.* The improvements will not create new significant hazards or require new hazardous materials, because construction activities will not change. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND, and the proposed improvements and reclassification will not create significant additional impacts from hazards or hazardous materials.
Hydrology and Water Quality	☒ Y ☐ N	*No Change.* The proposed improvements are not proposed within any hydrologic features and they will not result in new significant impacts to hydrology and water quality. Although soil disturbance will result from the improvements, applicable measures in the existing Stormwater Pollution

		Prevention Plan (SWPPP) and other relevant measures as described in the MND and other project permits will be implemented. Potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create significant additional impacts to hydrology or water quality.
Land Use and Planning	☒ Y ☐ N	*No Change.* The proposed improvements will not result in new significant impacts to land use because the current land use will not be converted and the use of these routes will be temporary. Therefore, potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create significant additional impacts to land use or planning.
Mineral Resources	☐ Y ☒ N	*No Change.* The improvements are do not cross any known mineral resources. Therefore, potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create additional significant impacts to mineral resources.
Noise	☒ Y ☐ N	*No Change.* The proposed improvements are located in a rural area, approximately 0.75 mile from the nearest sensitive receptor. The route is already in use and will not be located closer to residences or sensitive receptors. The use of the route will not require additional trips; therefore, traffic will not increase beyond the estimated 200 construction-related vehicle trips per day that were analyzed in the MND. In addition, impacts to noise as a result of construction vehicles were analyzed in the MND and the proposed improvements will have the same impacts. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create additional significant impacts from noise.
Population and Housing	☐ Y ☒ N	*No Change.* The improved route is already in use and will not be closer to residences than those described in the MND. The use of the routes will not induce population growth or displace existing housing or people. Therefore, potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create additional significant impacts to population or housing.
Public Services	☐ Y ☒ N	*No Change.* The improvements will not result in any impacts on public services because they are limited in scope and use of the routes will be of relatively short duration. The MND found that potential impacts on emergency response services, fire protection services, police services, school facilities, recreational facilities, public libraries, and hospitals will be less than significant because construction activities are temporary and do not require construction of new or physically altered governmental facilities for public services. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND and the improvements and reclassification of original routes will not create additional significant impacts to public services.
Recreation	☒ Y ☐ N	*No Change.* Impacts to recreational resources will not increase substantially beyond those identified in the MND because the improvements are limited in scope and use of the reclassified route will be of relatively short duration. The use of the route will not increase local population or housing and, therefore, will not increase demand for recreational facilities. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create additional significant impacts to recreation.

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Transportation and Traffic	☒ Y ☐ N	*No Change.* The improvements will not result in new significant impacts to transportation or traffic because the route is already in use, use will be of relatively short duration, and these routes are not public thoroughfares. In the MND, it was estimated that construction will generate over 200 vehicle trips per day within the project area. The improvements will not require additional trips; therefore, traffic will not increase beyond the estimated 200 construction-related vehicle trips per day that were analyzed in the MND. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND, and the improvements and reclassification will not create additional significant impacts to transportation or traffic.
Utilities and Service Systems	☒ Y ☐ N	*No Change.* The improvements will not result in new significant impacts to existing utilities or service systems because the route is already in use and the construction activities will not change. Environmental protection measures will be implemented as described in the MND. Therefore, potential impacts are consistent with those evaluated in the MND, and the proposed improvements and reclassification will not create additional significant impacts to utility or service systems.

Other Variance Conditions Attached: ☐Yes ☒ No

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PG&E Approval					
Title	**Name**	**Approval Initials**	**Date**	**Conditions (see attached)**	
Environmental Compliance Supervisor	Keith Miller	KM	9~~8~~/05~~24~~	☐ Yes	☒ No
Lead Environmental Inspector	Nick Fisher	NF	9~~8~~/05~~24~~	☐ Yes	☒ No
PG&E Project Biologist (if applicable)	Andrea Henke	AH	9~~8~~/05~~24~~	☐ Yes	☒ No
PG&E Project Archaeologist (if applicable)	Wendy Nettles			☐ Yes	☐ No
PG&E Storm Water Program Manager (if applicable)	John Villalobos			☐ Yes	☐ No
PG&E Environmental Compliance Lead	Andy Smith	AS	9/~~8~~05/~~24~~	☐ Yes	☒ No
PG&E Project Manager (if applicable)	Art de la Rocha	AD	9~~8~~/05~~24~~	☐ Yes	☒ No

Landowner Approval (if needed)		
Landowner Name	**Approval Signature**	**Date**
NA	NA	NA

Resource Agency Approvals	
Determine required agency approvals based on the following:	
Will biological resources/habitats be affected? NO	If yes, obtain CDFG and USFWS approval
Is this a variance from a permit? NO	If yes, obtain permitting agency approval
Will wetlands or waters of the U.S. be affected? NO	If yes, obtain U.S. Army Corps of Engineers approval
Will riparian areas or drainages be affected? NO	If yes, obtain CDFG approval – may require a permit
Will surface or groundwater be affected? NO	If yes, obtain RWQCB approval

Resource Agency	**Name**	**Approval Initials**	**Date**	**Conditions (see attached)**	
USFWS		NA		☐ Yes	☐ No
CDFG		NA		☐ Yes	☐ No
USACE		NA		☐ Yes	☐ No
RWQCB		NA		☐ Yes	☐ No

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CPUC and CPUC CONSULTANT SECTION

Variance Approved: ☐ Yes ☐ No

AFFECTED RESOURCE(s) and APPLICABLE MITIGATION MEASURES

☐ Aesthetics:	☐ Agriculture and Forestry Resources:	☐ Air Quality and Greenhouse Gas Emissions:
☐ Biological Resources:	☐ Cultural Resources:	☐ Geology, Soils, and Seismicity:
☐ Hazards and Hazardous Materials:	☐ Hydrology and Water Quality:	☐ Land Use and Planning:
☐ Mineral Resources:	☐ Noise:	☐ Population and Housing:
☐ Public Services:	☐ Recreation:	☐ Transportation and Traffic:
☐ Utilities and Service Systems:		

Other Variance Conditions Attached: ☐ Yes ☐ No

REQUIRED APPROVAL SIGNATURES

Consultant Environmental Monitor: (Note: signature signifies review only)

Consultant Project Manager: ☐ Level 1 Verbal Approval

CPUC Project Manager: ☐ Level 1 Verbal Approval

Level 1 variances require only verbal approval from CPUC Project Manager and Consultant Project Manager. Level 2 variances require signatures.

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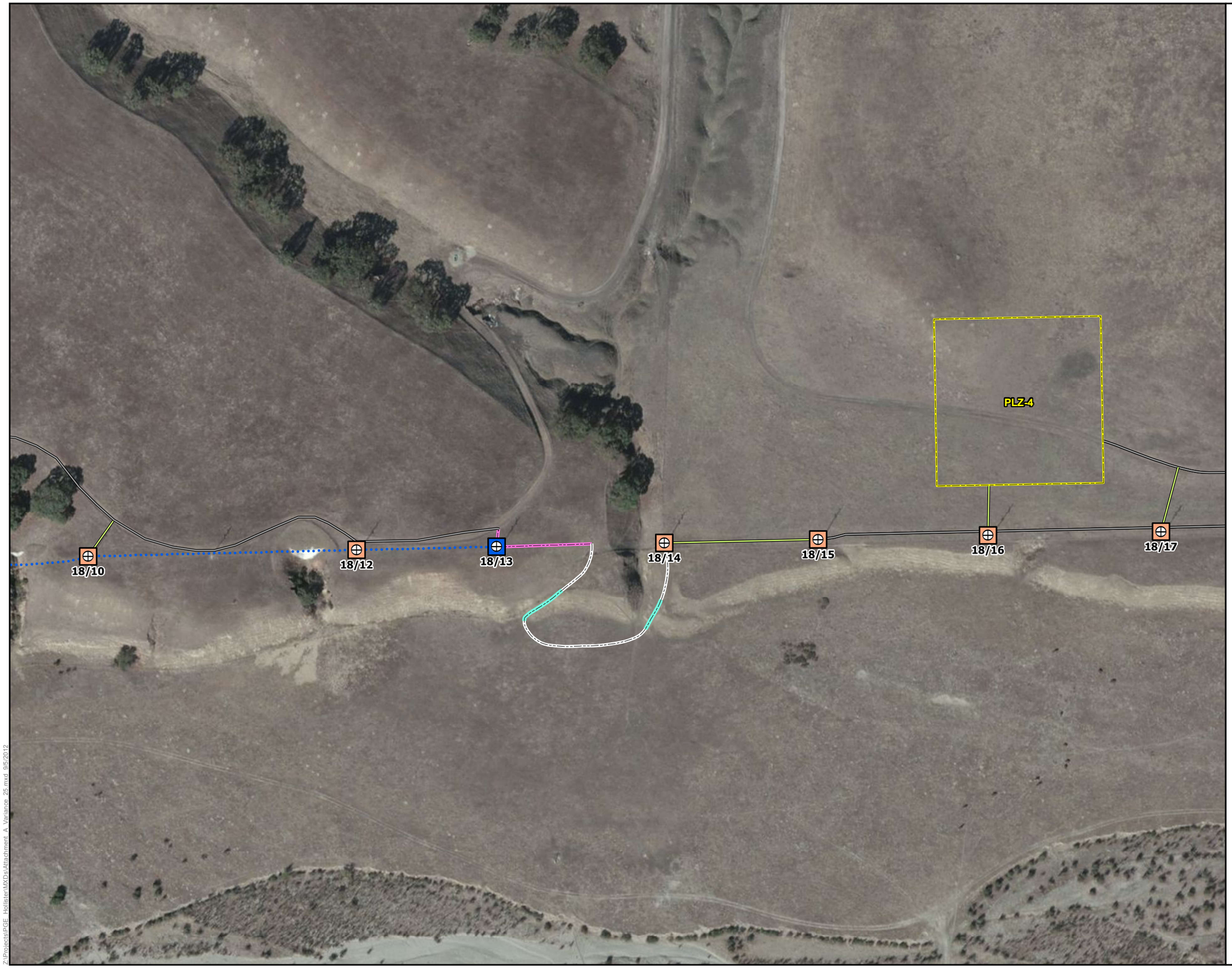
VARIANCE CONDITIONS

Condition Name:
Conditions:
Condition Name:
Conditions:
Condition Name:
Conditions:



ATTACHMENT A: VARIANCE 25 MAP

Hollister 115 kV Power Line Reconductoring Project

- LDS Location
- TSP Location
- Existing Pole
- Construction Area

Approved Road

- ATV Travel Route
- Overland Travel Route
- New Road
- Existing Road
- Existing Road - Needs Improvement

Variance 25 Proposed Road

- Existing Road
- Existing Road - Needs Improvement
- Overland Travel Route

Privileged and Confidential
Attorney Work Product

1:2,000

0 75 150 300 Feet

Pacific Gas and Electric Company®

INSIGNIA ENVIRONMENTAL

Source: Insignia 2012; PG&E 2012

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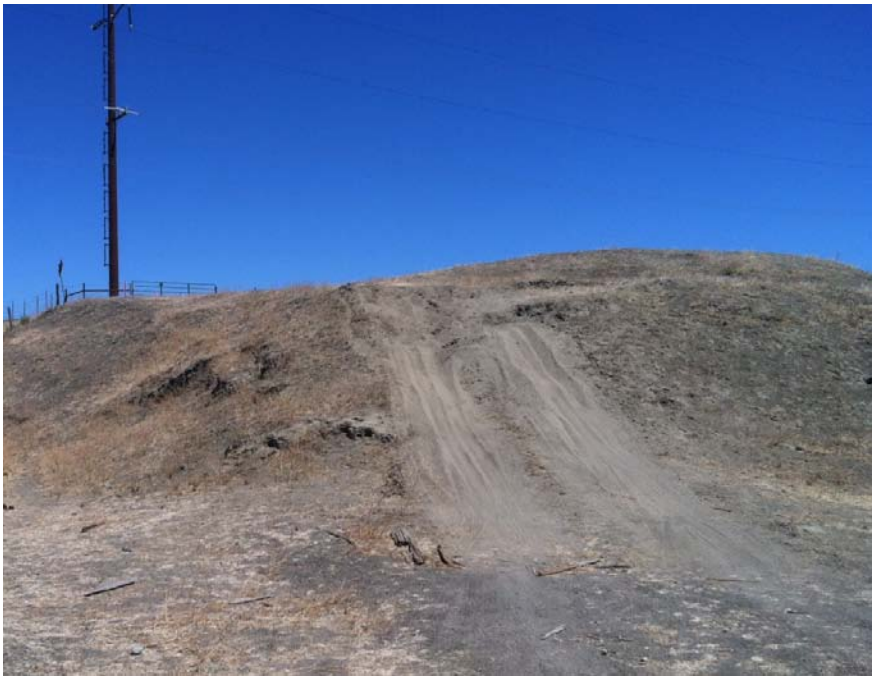
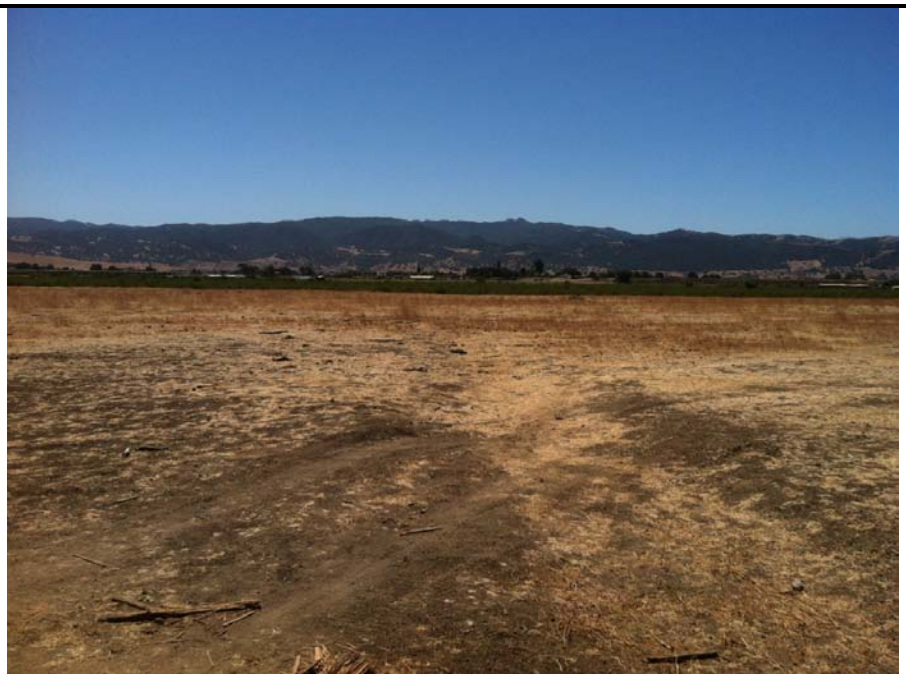
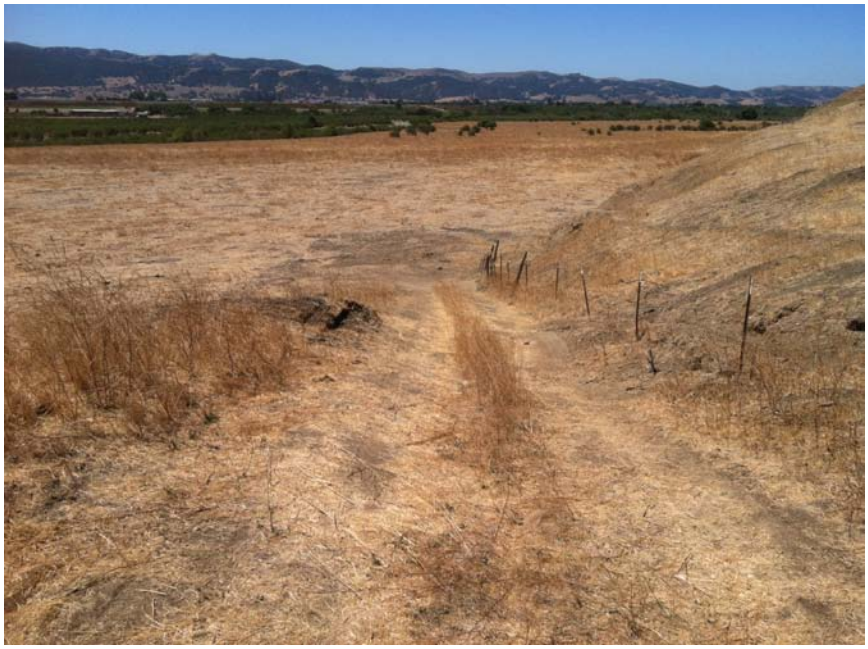
ATTACHMENT B: VARIANCE #25 PHOTOGRAPHS



Photograph 1: View looking northeast towards the access road near Pole 18/14. The new Pole 18/14 can be seen centerleft of the photo. This portion of the access road would receive minor improvements to remove ruts and slightly reduce the grade. It is too steep for heavy equipment to use. Note the sparse vegetation on the slope.



Photograph 2: Looking south towards the San Benito River from the lower terrace. Existing vehicle tracks are visible in the foreground. This portion of the access would not be improved.



Photograph 3: Looking southwest down the existing access from the Pole 18/13 side. This portion of the road would receive minimal improvements, primarily to remove ruts and level the existing surface.