Variance Request Form

PG&E Hollister 115 kV Power Line Reconductoring Project

Variance Request No.: 35

CONTRACTOR SECTION

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

Photos? ☒Yes ☐No

Landowners:
PAMCO Investments, LLC; properties are encumbered by easements to access, maintain and operate the power line.

Attachments? ☒Yes ☐No

- Attachment A: Variance 35 Map

Current Land Use: Agriculture, primarily cattle grazing

Permit Measure or Specification:

- California Public Utilities Commission (CPUC) Mitigated Negative Declaration (MND) Project Description
  - Deviation from the project description to reclassify portions of the existing access road between San Juan Grade Road and Tower 0/04 to allow for road improvements, as well as to allow for temporary road improvements to the overland travel route between Tower Pull Site (TP)-3 and TP-4.

Detailed Description of Variance:

In order to construct the project during the rainy season, the existing access road between San Juan Grade Road and Tower 0/04 (refer to Figure 2-2a in the MND) will need to be maintained, restored, and improved. PG&E is requesting authorization from the CPUC to reclassify portions of the existing road to "existing road – needs improvement," and to subsequently improve up to a total of approximately 1,000 feet (0.2 mile) mile of the road to allow for safe passage by heavy equipment. The improvements to the existing access road would include repairing erosive features with sand and gravel and adding additional 3-inch gravel to the sections to ensure stability, as well as to reduce the potential for erosion and sedimentation. These repairs would require delivering sand and gravel and other materials with a dumptruck and flatbed trailer, and placing it with a backhoe in the eroded features. The gravel would be compacted as necessary with a roller.

PG&E is also proposing road improvements on the approximately 220-foot-long (0.04 mile) overland travel route portion of the existing access road between TP-3 and TP-4. The improvements will include installing a geotextile fabric and a layer of sand and gravel. The improvements to the overland access road will be revegetated in accordance with the project's Habitat Mitigation Plan at the conclusion of construction.

Depending upon rainfall and the construction schedule, if this variance is approved, in the short-term it may be necessary to first install steel plates or mats in these same portions of the road to allow for access, until the more substantial improvements described above can be implemented.

The sand and gravel would be imported from the Hollister area. The extent of the road improvements are also shown on Attachment A: Variance 35 Map.

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 35 Map depicts the location of the reclassification.

Table 1: Access Roads

Type of Access	MND and Previously Approved Variances (miles)	Variance Request #35 (miles)	Total (miles)
Existing Road	17.53	(0.2)	17.33
Existing Road – Needs Improvement	2.55	0.2	2.75
New Road	0.32	0.00	0.32
Overland Travel Route	7.31	0.00	7.31
All-Terrain Vehicles (ATV) Overland Access Route	1.20	0.00	1.20
Total	**28.91**	**0.00**	**28.91**

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Variance Justification:

PG&E finished constructing and raising all of the towers along the tower segment in December 2012. Because completion of the tower segment improves the current situation in which PG&E is currently providing service to the Watsonville area (utilization of the shoo-fly line for Hollister limits PG&E's flexibility in serving the Watsonville area), PG&E has decided to work through the wet season and complete the reconductoring of the tower segment as soon as possible.

Due to soil conditions and the heavy rain received in December, there have been erosion and sedimentation issues along portions of the section of access road. In January 2013 small rills that had developed in the road were filled in by hand, and a series of gravel bags have been placed along the access road to slow water flow and prevent further erosion (refer to Attachment B: Photographs); however PG&E's SWPPP Monitor has indicated that this is only an effective short-term solution. To prevent future erosion, more substantial repairs should be made. In addition, PG&E's construction crew has determined that in order to ensure heavy duty vehicles can access TP-3 and TP-4I in wet conditions, the road should be improved.

As described in the resource evaluation section below, 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 road 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 road does not traverse Important Farmland, but does traverse grazing land. The improvements will not significantly impact agricultural activities because the road is already in use. The improvements 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 require truck trips to the road to deliver the gravel; however, 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 route within the 500-foot survey buffer and were, therefore, evaluated in the MND. The proposed improvements are not located within any CDFW, 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) will be completed for the areas of disturbance shown on Attachment A: Variance 35 Map. A report describing the survey results will be submitted to the CPUC. In addition, surveys for California tiger salamander (CTS), and California red-legged frog (CRLF), and nesting birds will be conducted immediately prior to the improvements being made. 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 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 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 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. The road is already in use and will not be located closer to residences or sensitive receptors. 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 road is already in use and will not be closer to residences than was described in the MND. The use of the road 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 road 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 road will be of relatively short duration. The use of the road 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.
Transportation and Traffic	☒ Y ☐ N	*No Change.* The improvements will not result in new significant impacts to transportation or traffic because the road is already in use, use will be of relatively short duration, and the road is not a public thoroughfare. 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 road 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	2/07	☐ Yes	☒ No
Lead Environmental Inspector	Nick Fisher	NF	2/07	☐ Yes	☒ No
PG&E Project Biologist (if applicable)	Andrea Henke	AH	2/07	☐ Yes	☒ No
PG&E Project Archaeologist (if applicable)	Wendy Nettles	N/A	N/A	☐ Yes	☐ No
PG&E Storm Water Program Manager (if applicable)	Keith Baker	NP	2/07	☐ Yes	☒ No
PG&E Environmental Compliance Lead	Andy Smith	AS	2/07	☐ Yes	☒ No
PG&E Project Manager (if applicable)	Bill Czabaranek	BC	2/07	☐ 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 35 MAP

Hollister 115 kV Power Line Reconductoring Project

- New Tower
- Existing Tower
- Proposed Gate
- Tree Removal and Trimming
- Pajaro Manzanita (ICF 2008)
- Existing Switch
- Shoo Fly Points
- Construction Area
- Existing Road
- Existing Road - Needs Improvement
- Overland Travel Route

Variance 35 - Proposed Road

- Existing Road - Needs Improvement

0/07
TP-4
0/06
TP-3
0/05
0/04
TP-2
0/3A
TP-1
37/232

1:6,000

0 250 500 1,000 Feet

Pacific Gas and Electric Company®

INSIGNIA ENVIRONMENTAL

Source: ICF, 2008; Insignia, 2012; PG&E, 2012; USGS, 2012

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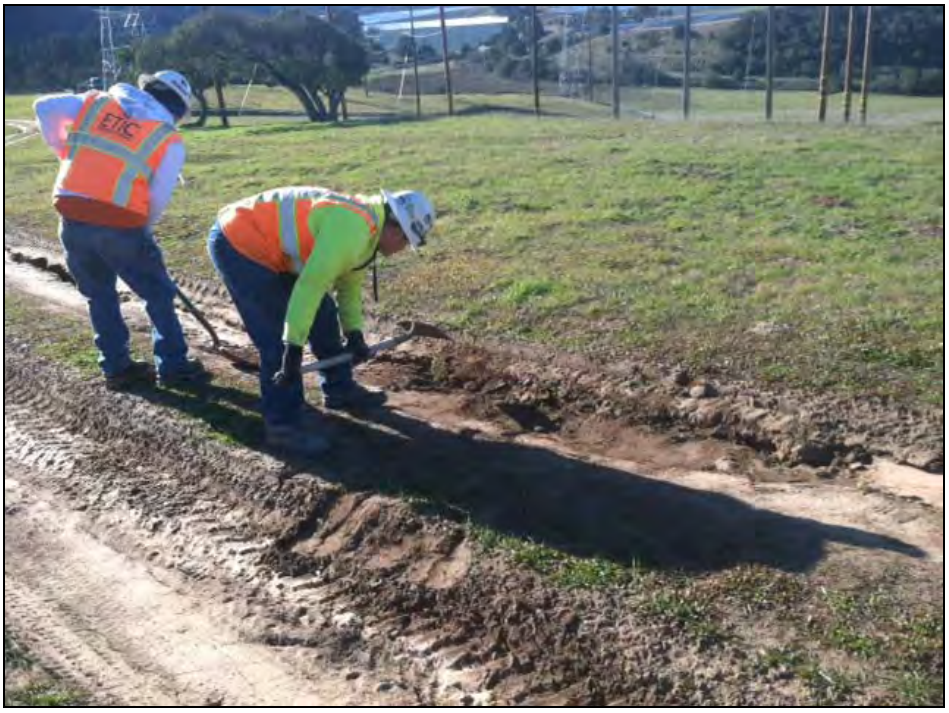
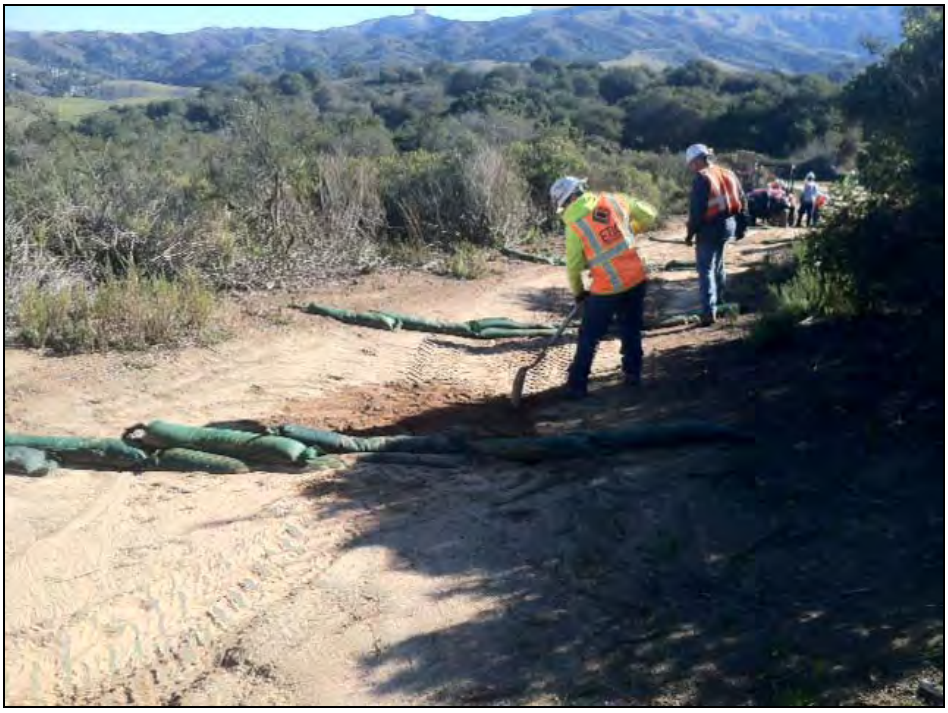


Photograph 1:

View of the ETIC Engineering (ETIC) crew filling in gullies on the access road to Tower Pull Site (TP)-3 near Tower 0/03 on January 14, 2013.



Photograph 1:
View of the ETIC crew filling in gullies and installing gravel bags on the access road to TP-3 near Tower 0/04 on January 14, 2013.