



## Variance Request Form

### PG&E Hollister 115 kV Power Line Reconductoring Project

Variance Request No.: 6

#### CONTRACTOR SECTION

Request Prepared By: Kevin Kilpatrick,  
 Environmental Compliance Supervisor  
 Landowner: Natural Foods, LLC - APN: 012-050-010  
 Current Land Use: Agriculture/Agricultural Industry

Photos?  Yes  No

Attachments?  Yes  No  
 • Attachment A: Location Map  
 • Attachment B: Photographs

#### Permit Measure or Specification:

- California Public Utilities Commission (CPUC) Mitigated Negative Declaration (MND) Project Description
  - Relocation of Pole Landing Zone (PLZ)-2 to a new PLZ and staging area to a site approximately 300 feet away
  - Change to Project Drawings to relocate PLZ-2 to a new PLZ and staging area

#### Detailed Description of Variance:

Pacific Gas and Electric Company (PG&E) has prepared this Variance Request Form to request a change in location for PLZ-2 along the Hollister 115 kilovolt (kV) Power Line Reconductoring Project (project). PG&E proposes to relocate PLZ-2 approximately 300 feet north onto a property owned by Natural Selection Foods, LLC, also known as Earthbound Farms (EBF). PG&E is proposing this relocation because PG&E was not able to obtain landowner permission to access PLZ-2. EBF has agreed to allow PG&E to use its property, which is located across from the existing PLZ-2 location along the pole segment of the project near Poles 13/07 to 14/01. The proposed EBF staging area is represented in Attachment A: Location Map. Photographs of the site are provided in Attachment B: Photographs. PG&E is seeking approval of this variance for use of the proposed site as soon as possible, since the project urgently requires the use of this site for staging activities.

The proposed EBF staging area is located in a barren dirt lot that is no longer used for farming, but is regularly disked by EBF to control weeds and is maintained in a relatively barren condition. PG&E plans to cover the area with gravel, which will be placed on top of a layer of fabric or plastic. The gravel and fabric are temporary measures intended to facilitate the use of this site during the winter months. These materials will be removed at the end of the project and the site will be restored to its original condition.

The original PLZ-2 site was 5 acres in size, while the proposed EBF staging area will also cover an approximate 5-acre area. The proposed EBF staging area is within the study zone that was performed for the CEQA review, and the site will be used in the same manner as the PLZ-2 site, with the same kind of equipment and materials to be stored there. It will be the main project show-up and delivery yard for PG&E employees and contractors. Equipment located on the proposed EBF staging area will include bucket trucks, water trucks, cement trucks, cranes, back hoes, pick-up trucks, crew trucks, flat bed transport trailers, mini-excavators, helicopters, and a re-fueling vehicle. Materials that will be stored on site include reels of conductor wires, insulators on pallets and crates, nuts and bolts, stacks bundled steel (to construct the new lattice towers), rebar steel, bags of cement, crates of new 115 kV Switches, and tools. Primary access to the site will be from the San Juan Highway. San Justo Road may be used as an alternate entry/exit to the site.

#### Variance Justification:

The proposed new EBF staging area will eliminate PLZ-2 since PG&E could not obtain permission from the property owner to access that area. The proposed EBF staging area is located in an area that PG&E will be able to access from public roads. In addition, the new EBF staging area is an area that has been previously disturbed. For these reasons, PG&E determined that it is necessary and preferable to relocate PLZ-2 to the new location. PG&E will return the site to its pre-construction condition, and environmental protection measures will be implemented as described in the MND and other project permits.



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<b>PG&amp;E ENVIRONMENTAL SECTION</b>		
<b>RESOURCE EVALUATION</b>		
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.		
<b>CEQA SECTION</b>	<b>Applicable</b>	<b>(Y) Define Potential Impact or (N) Briefly Explain Why CEQA Section isn't Applicable</b>
Aesthetics	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>There are no scenic vistas or scenic highways within view of either PLZ-2 or the proposed EBF staging area. Due to the close proximity of the proposed EBF staging area to the existing PLZ-2, the visual scenario will be the same as what was presented in the MND. Construction activity at the site will generally occur during daylight hours; however, the MND also evaluated potential impacts from occasional nighttime construction lighting on the project. Mitigation Measure 3.1-1, which is designed to reduce lighting impacts at construction and storage yards and staging areas, will be implemented to reduce any occasional construction night lighting impacts to a less than significant level.</p> <p>Potential impacts associated with relocating the construction staging area to the EBF site are consistent with those evaluated in the MND and will not result in any new significant impacts to aesthetics.</p>
Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>Like the existing PLZ-2 site, the proposed EBF staging area is located within an area that is designated as Prime Farmland; however, the site will be used in a similar manner as its current use (i.e., like use) and will be returned to preconstruction conditions upon completion of the project. Since PLZ-2 will no longer be used, the amount and general location of Prime Farmland that was analyzed for temporary use in the MND remains unchanged. Therefore, the proposed change is consistent with the California Environmental Quality Act (CEQA) analysis and does not introduce a new significant impact.</p>
Air Quality and Greenhouse Gas Emissions	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>The MND analyzed 200 construction-related vehicle trips per day within the project area, as well as construction related equipment. The use of the EBF staging area will not increase the amount of traffic beyond what was analyzed in the MND. In addition, the use of the EBF staging area will not increase the amount or use of heavy equipment on the project and, therefore, will not increase emissions beyond what was analyzed in the MND. Therefore, potential impacts are consistent with those evaluated in the MND and do not create any additional impacts.</p>
Biological Resources	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>During the CEQA review for the project, ICF International prepared a Biological Assessment which evaluated the project areas and a 500-foot buffer for special-status species including San Joaquin kit fox (SJKF), burrowing owl (BUOW), American badger, (AMBA), California tiger salamander (CTS), and California red-legged frog (CRLF). The area where the proposed EBF staging area is located is within this 500-foot survey buffer and was, therefore, included in the evaluation during the CEQA review. The Biological Assessment concluded that the site was not suitable habitat for special-status species; however, to assure that a suitable buffer was evaluated, Insignia Environmental conducted preconstruction wildlife surveys at this location on October 18, 2011 for SJKF, AMBA, and BUOW. The surveys were conducted within the entire 5-acre area and included a 250-foot survey buffer. No special-</p>



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		status species or evidence of the species, including scat, tracks, and burrows were found at the site. A report describing the survey results was submitted separately to the CPUC on November 7, 2011 for review. Because 30 days has lapsed since the initial survey, surveys for SJKF, AMBA, and BUOW will be reconducted prior to initial construction activity at this site, and CRLF and CTS surveys will be conducted immediately prior to initial construction activity. Therefore, no new impacts to biological resources are anticipated as a result of utilizing the proposed EBF staging area.
Cultural Resources	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	During the course of the CEQA review, PG&E prepared a Historic Properties Inventory Report, which included an evaluation for cultural resources of the project and a 500-foot buffer. The area where the proposed EBF staging area is located is within the 500-foot survey buffer and was, therefore, included in the evaluation. No archeological or cultural resources were found in the proposed EBF staging area; however, the area was identified in the report as an area of high potential archeological sensitivity. The MND for the project contained Applicant Proposed Measure (APM) CR-APM-1, which requires cultural monitoring for excavation in areas of high potential archeological sensitivity. However, no excavation is anticipated to occur at this site and it is highly disturbed as a result of the property owner's current operations; therefore, cultural monitoring was determined to be unnecessary. As a result, no new impacts to cultural resources are anticipated.
Geology, Soils and Seismicity	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	The proposed EBF staging area is located adjacent to the existing PLZ-2. The existing conditions and potential impacts at the proposed EBF staging area are consistent with those evaluated in the MND and will not result in any new impacts.
Hazards and Hazardous Materials	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Hazardous material Best Management Practices (BMP's) will be implemented, including the implementation of the Stormwater Pollution Prevention Plan (SWPPP). Potential impacts are consistent with those evaluated in the MND and will not result in a new impact.
Hydrology and Water Quality	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	The proposed EBF staging area is located adjacent to the existing PLZ-2. There are no water resources within the proposed site. Therefore, potential impacts are consistent with those evaluated in the MND and will not result in an additional impact.
Land Use and Planning	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	The MND conducted an analysis of potential conflicts of land use plans and policies in the counties and cities where the project occurs. No impacts were identified. The proposed EBF staging area is located adjacent to the existing PLZ-2. Relocating the staging area to the EBF site would not create new impacts to land use and planning.
Mineral Resources	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	There are no known mineral resources within the proposed site. Relocating the staging area to the EBF site would not create any additional impacts to mineral resources.
Noise	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	The proposed EBF staging area is located adjacent to the existing PLZ-2 and there are no sensitive noise receptors within at least 2,000 feet of either site. Relocating the staging area to the EBF site would not create any additional noise impacts. Applicable Applicant Proposed Measures (APM NOI-1 and APM NOI-2) and Mitigation Measures (3.11-1 through 3.11-3), which describe general noise abatement measures, will be implemented to reduce noise impacts to a less than significant level.
Population and	<input type="checkbox"/> Y	The relocation of a staging area from PLZ-2 to EBF would not create any new



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Housing	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	impacts to population and housing.
Public Services	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	No new impacts to public services will result from use of the proposed EBF staging area.
Recreation	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	The Juan Bautista de Anza National Historic Trail Corridor, which is under the jurisdiction of the National Park Service, is located in the vicinity of the proposed EBF staging area. There are no historic markers or other signs of the corridor near the EBF site. The corridor traverses south to north and occurs generally east of the EBF staging area along San Justo Road. This historic feature could attract visitors to the area; however, the proposed EBF staging area is located adjacent to the existing PLZ-2. Therefore, potential impacts are consistent with those evaluated in the MND and will not result in a new impact.
Transportation and Traffic	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Traffic and transportation impacts at the EBF staging area will be the same as would have occurred at the PLZ-2 staging area. The proposed relocation to the EBF site will not result in a substantial change of traffic patterns, congestion, or safety risk as originally identified in the MND. Use of the EBF staging area would be temporary and would occur at varying times throughout the day. Therefore, potential impacts are consistent with those evaluated in the MND and will not result in a new impact.
Utilities and Service Systems	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	No impacts will occur to existing utilities or service systems.
Other Variance Conditions Attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		



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PG&E Approval					
Title	Name	Approval Initials	Date	Conditions (see attached)	
Henkels & McCoy Project Manager (if applicable)	Craig Smithey	CS		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Henkels & McCoy Field Foreman (if applicable)	James Panter	JP		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Henkels & McCoy Env. Field Lead (if applicable)	Duke Sonderegger	DS		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Environmental Compliance Supervisor	Kevin Kilpatrick	KK		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Lead Environmental Inspector	Nick Fisher	NF		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
PG&E Project Biologist (if applicable)	Andrea Henke	AH		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
PG&E Project Archaeologist (if applicable)	Wendy Nettles			<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
PG&E Storm Water Program Manager (if applicable)	Hugo Jurado			<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
PG&E Environmental Compliance Lead	Andy Smith	AS		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
PG&E Project Manager (if applicable)	Rod Parame			<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Landowner Approval (if needed)					
Landowner Name	Approval Signature	Date			
Natural Foods, LLC					
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		N/A		<input type="checkbox"/> Yes	<input type="checkbox"/> No
CDFG		N/A		<input type="checkbox"/> Yes	<input type="checkbox"/> No
USACE		N/A		<input type="checkbox"/> Yes	<input type="checkbox"/> No
RWQCB		N/A		<input type="checkbox"/> Yes	<input type="checkbox"/> No





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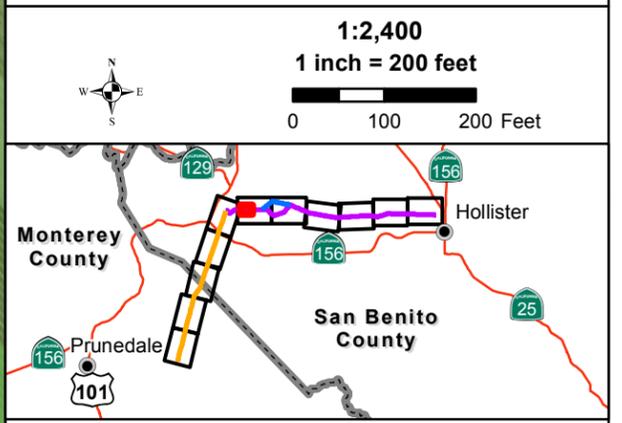
**VARIANCE CONDITIONS**

<b>Condition Name:</b>
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<b>Condition Name:</b>
<b>Conditions:</b>

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- Hollister Pole Segment
  - Hollister Tower Segment
  - Proposed River Crossing
  - ⊕ Existing Pole Location
  - ⊗ Existing Pole to be Removed
  - Existing Pole to be Topped
  - Proposed LDS Location
  - Proposed TSP Location
  - ▭ Construction Areas
- Farmland Mapping and Monitoring - 2010**
- Disturbed
  - Prime
- PLZ – Pole Landing Zone and Lay Down
- ▲ Substation
  - ⊕ Parcel



Data Sources: ICF 2008, PG&E 2008, ESRI 2010  
 Preliminary and subject to change based on California Public Utilities requirements, final engineering, and other factors.

Photographs	Description
	<p><b>Photograph 1:</b> New location of proposed staging area/landing zone at Earthbound Farms. Photograph facing east</p>
	<p><b>Photograph 2:</b> New location of proposed staging area/landing zone at Earthbound Farms. Photograph facing east</p>