STATE OF CALIFORNIA
Governor

Edmund G. Brown Jr.,

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

September 24, 2013

Ms. Cristina Holstine
Pacific Gas and Electric Company
Land Planner, Technical and Land Services
245 Market Street, Room 1054A
San Francisco, CA 94105-1702

Subject: Crazy Horse Canyon Switching Station Project—Review of Minor Project Modification #10

Dear Ms. Holstine:

The California Public Utilities Commission (CPUC) has reviewed Pacific Gas and Electric Company's (PG&E's) proposed Minor Project Modification (MPM) #10, provided by email on September 9, 2013, for the approved Crazy Horse Canyon Switching Station Project (project) (Attachment A). These minor modifications are consistent with the approved Final Initial Study/Mitigated Negative Declaration (IS/MND) and would not result in new significant impacts, or significantly greater impacts than those addressed in the IS/MND for the project.

Proposed Action

PG&E will use an approximately 0.4-acre work area surrounding Seasonal Wetland 2 (SW2) adjacent to the Switching Station entrance gate ("Gate 2") on San Juan Grade Road and the permanent access road (shown on Attachment A) in order to construct 0.05 acre of new compensatory wetland on site, as described in the Wetland Mitigation Monitoring Plan (WMMP). The WMMP was developed through consultation with United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), the California Department of Fish and Wildlife (CDFW). The wetland mitigation is required by the 404 Permit, 401 Water Quality Certification, Streambed Alteration Agreement, and Applicant Proposed Measures (APMs) Biology-11 and Hydrology-2. Of the total 0.4-acre work area, 0.35 acre would be temporarily used to access and maneuver equipment to create 0.025 acre of wetland on either side of SW2 (totaling the required 0.05 acre), and for any additional contouring that is needed to accommodate the topography of the expanded wetland.

Access to the eastern portion of the proposed work area would be from the Gate 2 access road. Access to the western portion of the proposed work area would be through an existing rancher's gate, south of Gate 2 (shown on Attachment A). Equipment to be used in the area would include a rubber-tracked mini-excavator and a bobcat, or similar equipment. Disturbance

in the area would be limited to that needed to complete the wetland mitigation work. Work would last for approximately three days.

The CPUC authorized the 0.05 acre expansion of SW2 on April 8, 2013 as part of Notice to Proceed #5; however, the 0.35 acre work area was not included in the request.

Analysis

The MPM was reviewed to determine whether the proposed action would result in a new significant environmental effect or would substantially increase the severity of a previously identified significant environmental effect. The MPM is consistent with the analysis presented in the IS/MND and additional review under the California Environmental Quality Act is not required.

Aesthetics

Less than significant impact. The IS/MND analyzed removal of grassland vegetation and replacement with other vegetation types such as those proposed in the WMMP. The new wetland is on the flanks of an existing wetland (SW2) and after construction, would be visually indistinguishable from existing conditions. The creation of 0.05 acre of wetlands would not result in new or more severe aesthetic impacts than those analyzed in the IS/MND.

Agriculture and Forestry Resources

Less than significant impact. The project is located on agricultural lands subject to a Williamson Act contract that are used as grazing lands. Impacts to Williamson Act lands were evaluated in the IS/MND and determined to be less than significant. The IS/MND analyzed the temporary loss of 25 acres of grazing land and the permanent loss of 12.2 acres, representing a cumulative loss of 0.0009 percent across the county. Creating the 0.05 acre of new wetland would be a *de minimis* additional loss beyond what was addressed in the IS/MND and therefore falls within the analysis presented in the IS/MND.

Impacts to Williamson Act lands may not be permanent. The new wetland would be fenced from cattle for up to five years during the wetland monitoring period described in the WMMP, or until it was determined that cattle would not conflict with WMMP success criteria. Once the new wetland no longer needs to be protected from cattle, the new wetland grazing access would be returned to the wetland. The replacement of 0.05 acre of upland vegetation with wetland vegetation would not result in additional impacts to agricultural resources beyond those considered in the IS/MND.

Air Quality and Greenhouse Gases

Less than significant impact. The proposed action would require the use of a rubber-tracked mini-excavator and a bobcat, or similar equipment. The use of this type of equipment was analyzed in the IS/MND. Soil disturbance during excavation and recontouring was also analyzed in the IS/MND. The IS/MND found that the maximum daily construction emissions from project

construction would be 62.9 pounds per day of PM_{10} (for 36.2 acres). The disturbance of up to 0.4 acre of land to create new wetland is minimal and would be within the estimated PM_{10} emissions previously analyzed for the project. Impacts were addressed in the IS/MND and no new or additional impacts would occur.

Biological Resources

Less than significant impact.

Special-status plants. The proposed work area was previously surveyed for special-status plants during pre-construction surveys. No special status plants were identified in the proposed work area; therefore, the proposed action would not impact special-status plants.

Special-status wildlife. The proposed action may affect special-status wildlife species such as California red-legged frog (CRLF), California tiger salamander (CTS), and coast range newt. Impacts to these species were evaluated in the IS/MND and incidental take during activities associated with creation of the wetland have been authorized by the USFWS Biological Opinion (BO) and CDFW Incidental Take Permit (ITP). Implementation of sensitive amphibian protection measures outlined in the IS/MND, BO, and ITP would reduce the risk of impact to these species. The proposed action would therefore not result in new or more severe biological resource impacts than those analyzed in the IS/MND.

Cultural Resources

Less than significant impact. The proposed work area was surveyed for cultural resources on August 23, 2012, as part of MPM #3 (Attachment B). No cultural resources were found in the work area. As discussed in the IS/MND, previously undiscovered cultural resources may be encountered during excavation and ground disturbance. Mitigation measures and APMs in the IS/MND would be implemented. The proposed action would therefore not result in new or more severe cultural resource impacts from those analyzed in the IS/MND.

Geology, Soils, and Seismicity

Less than significant impact. Geology and soil impacts from minor excavation and recontouring were addressed in the IS/MND. Construction of the new wetland area would take place during the dry season (prior to October 1) per the Section 401 permit and the BO. Disturbed areas within the temporary work area will be stabilized following completion of the work using the seed mix approved for the project. The 0.05 acre of new wetland would be mulched and, if needed, watered to stabilize the soil, as described in the WMMP. The proposed action would therefore not result in new or more severe impacts to geology or soils from those analyzed in the IS/MND.

Hazards and Hazardous Materials

Less than significant impact. The bobcat and the mini-excavator used to construct the wetland areas would use hazardous materials such as oils, lubricants, and gasoline that could be

released into the environment, similar to the equipment used for project construction, which is addressed in the IS/MND. Mitigation measures and APMs in the IS/MND would be implemented to reduce the potential for a release of hazardous materials and appropriate response should one occur. The proposed action would therefore not result in new or more severe hazardous materials impacts from those analyzed in the IS/MND.

Hydrology and Water Quality

Less than significant impact. Work in and around wetlands, and the impacts to hydrology and water quality, were evaluated in the IS/MND and determined to be less than significant with mitigation. The proposed wetland work would be consistent with work proposed in the IS/MND. Mitigation measures and APMs in the IS/MND would be implemented to reduce impacts, including allowing work only in the dry season (prior to October 1) and implementing erosion control best management practices from the project Storm Water Pollution Prevention Plan (SWPPP). The WMMP requires that excavated soil be removed from the area and disposed of in non-wetland areas on the site where it cannot be transported through sedimentation into the wetland. The WMMP also requires that exposed soil in the 0.05-acre of new wetland be covered with mulch to prevent soil loss. The proposed action would therefore not result in new or more severe hydrology and water quality impacts from those analyzed in the IS/MND.

Land Use and Planning

No additional impact. The work area is within the 25-acre parcel of land purchased by PG&E for the project that was addressed in the IS/MND. The proposed action would have no additional impact on land use and planning.

Mineral Resources

No additional impact. There are no known important mineral resources in the work area, as described in the IS/MND. The proposed action would therefore have no impact on mineral resources.

Noise

Less than significant impact. The proposed action would generate noise from use of heavy equipment. Noise impacts from heavy equipment, including a bobcat, were addressed in the IS/MND. The nearest sensitive receptors to the proposed work area are three residences, the closest of which is approximately 650 feet from the eastern edge of the work area. Construction of the wetland would not result in greater noise emissions than those previously evaluated for the project. APMs in the IS/MND that address construction noise would be implemented as needed. The proposed action would therefore not result in new or more severe noise impacts than those analyzed in the IS/MND.

Population and Housing

No additional impact. Construction of the mitigation wetland would have no impacts to population and housing.

Public Services

No additional impact. Construction of the mitigation wetland would have no impact on public services.

Recreation

No additional impact. Construction of the mitigation wetland would not impact recreation.

Transportation and Traffic

No additional impact. Workers and construction vehicles would access the site from the same roadways analyzed in the IS/MND. The number of vehicles and workers required to construct the wetland would be low and work would be completed in approximately three days. The proposed action would therefore not result in new or more severe impacts to transportation and traffic from those analyzed in the IS/MND.

Utilities and Service Systems

No additional impact. The proposed action would have no impact on utilities and service systems.

Conclusion

Implementation of the MPM would not result in new or significantly greater impacts to the environment, and do not present new substantial information that would change the findings presented in the IS/MND. The MPM is consistent with the IS/MND and no additional CEQA review is required.

Please contact me or Susanne Heim at Panorama Environmental, Inc., if you have any questions.

Sincerely,

CPUC Project Manager

cc: Susanne Heim, Panorama Environmental, Inc.
Aaron Lui, Panorama Environmental, Inc.
Janet Liver, TRC

Attachments:

Attachment A	PG&E Minor Project Modification Request #10 and Maps
Attachment B	Cultural Resource Memo from Garcia and Associates

Attachments

Attachment A

Pacific Gas and Electric Company

Cristina Salguero Holstine
Land Planner
Corporate Real Estate

(415) 973-7406

245 Market Street, Room 1054A
San Francisco, CA 94105

Mailing Address:
Mail Code N10A
P.O. Box 770000
San Francisco, CA 94177

Mr. Andrew Barnsdale
California Public Utilities Commission
Energy Division CEQA Unit
505 Van Ness Avenue
San Francisco, CA 94102

September 9, 2013

Re: Crazy Horse Canyon Switching Station Project
Minor Project Modification #10 – Access to Compensatory Wetland Mitigation Site

Dear Andrew,

Applicant Proposed Measure (APM) Hydrology-2 states "PG&E will provide compensatory mitigation for permanent impacts to waters of the state and waters of the U.S. as required by the USACE, RWQCB, and CDFG as part of the permitting process for each agency." Construction of the permanent access road to the switching station has a 0.025-acre permanent impact to seasonal wetland SW2, located adjacent to San Juan Grade Road (see Attachment 1: Approved Project Workspace). PG&E obtained approval to place a culvert and fill in the wetland from the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act and the Regional Water Quality Control Board (RWQCB) under Section 401 of the Clean Water Act in January 2012, and the California Department of Fish and Wildlife (CDFW) under Section 1602 of the Fish and Game Code in May 2013. To compensate for the permanent loss of wetland, PG&E is required by the USACE, RWQCB, and CDFW to create 0.05 acre of wetland as defined in the Wetland Mitigation and Monitoring Plan (WMMP).

The compensatory wetland mitigation work involves enlarging seasonal wetland SW2 within an area that is on PG&E property and near the switching station access road, but not within workspace identified in the Initial Study as needed for construction of the switching station facility (see Attachment 2: Figure 2 from the WMMP). To complete the wetland mitigation work, PG&E plans to access the east side of the wetland mitigation site from the Gate 2 access road, and access the west side of the wetland mitigation site through a rancher's gate on PG&E property, immediately west of the wetland and approximately 130 feet from Gate 2 (identified on Attachment 2. Panorama has informed PG&E that a minor project modification is required to use the rancher's gate to access the west side of the wetland mitigation site. However, it is not clear to PG&E why CPUC approval is required when the Initial Study/Mitigated Negative Declaration for the Crazy Horse Project (issued in May 2011) evaluates the potential impacts of construction of the switching station project, and not potential impacts of compensatory mitigation requirements specified in permits issued by resource agencies. If a minor project modification to the project is required to complete the compensatory wetland mitigation work specified in the

authorizations issued by the USACE, RWQCB, and CDFW, PG&E requests the CPUC approve access to the wetland mitigation site based on the attached information.

The work is tentatively scheduled to occur between September 23 and 25, 2013. Work within wetlands is prohibited between October 1 and May 30. Please do not hesitate to contact me at 415-973-7406 should you require more information.

Sincerely,

Cristina Holstine
Senior Land Planner, PG&E

c.c.: Suzanne Heim, Panorama
Janet Liver, TRC

Modification #10: Access to Compensatory Wetland Mitigation Site.

APM Hydrology-2 states "PG&E will provide compensatory mitigation for permanent impacts to waters of the state and waters of the U.S. as required by the USACE, RWQCB, and CDFG as part of the permitting process for each agency." The loss of 0.025 acre of seasonal wetland SW2 during construction of the Crazy Horse Switching Station Project (project) has been approved by the USACE (authorization under Section 404 of the Clean Water Act), the RWQCB (authorization under Section 401 of the Clean Water Act), and the CDFW (authorization under 1602 of the Fish and Game Code). As part of the permitting process for each agency, compensatory mitigation consisting of the creation of 0.05 acre of wetland by enlarging seasonal wetland SW2 adjacent to the project site as defined in the WMMP is a condition of the approval. The Final Mitigated Negative Declaration (FMND) dated May 2011 does not evaluate potential impacts of implementing compensatory wetland mitigation required by the USACE, RWQCB, and CDFW permits issued in January 2012 and May 2013. The FMND also does not address how the wetland mitigation site will be accessed.

PG&E is requesting permission to implement the WMMP approved by the USACE, RWQCB, and CDFW. Access to the east side of the wetland mitigation site will be from the switching station access road, and access to the west side of the wetland mitigation site will be from a rancher's gate located on PG&E property approximately 130 feet from the switching station access road on San Juan Grade Road. Equipment that will access the site through the rancher's gate will be a rubber-tracked mini-excavator and a bobcat (or similar). Disturbance to upland areas resulting from accessing the wetland mitigation site will limited to that needed to complete the wetland mitigation work, and the disturbance area will be stabilized following completion of the work (anticipated to take three days) using the seed mix approved for the project.

Justification:
PG&E is required to implement the WMMP in compliance with authorizations issued by the ACOE, RWQCB and CDFW for construction of the Crazy Horse Canyon Switching Station Project. The wetland mitigation site and access to the site is on PG&E property adjacent to the project.

RESOURCE EVALUATION	
CEQA Guidelines 15162 review: The proposed minor project modification is to allow PG&E to implement the Wetland Mitigation and Monitoring Plan (creation of 0.05-acre of wetland) as approved by the ACOE, RWQCB, and CDFW, and to access to the wetland mitigation site. It does not involve substantial changes to the Crazy Horse Canyon Switching Station Project or project circumstances that will require major revisions to the mitigated negative declaration. It will not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts.	
CEQA SECTION	**Evaluation**
Aesthetics	**Potential Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not have an adverse effect on a scenic vista, damage scenic resources, degrade the existing visual character, or create a new source of light or glare. Therefore, potential impacts are consistent with those evaluated in the FMND.
Agriculture and Forestry Resources	**No Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not convert farmland of prime, unique, or statewide importance to non-agricultural use, conflict with existing zoning for agricultural use or a Williamson Act contract, or result in loss of Farmland to non-agricultural use. Therefore, potential impacts are consistent with those evaluated in the FMND.
Air Quality and Greenhouse Gas Emissions	**Potential Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not conflict with or obstruct implementation of applicable air quality plans, violate any air standard, result in a violation of an air quality standard, expose sensitive receptors to pollutant concentrations, or create objectionable odors. Therefore, potential impacts are consistent with those evaluated in the FMND.
Biological Resources	**Potential Impact:** The wetland mitigation site and access to it is within the study area of the project. Therefore, potential impacts are consistent with those evaluated in the FMND.
Cultural Resources	**No Impact:** No cultural resources are known to exist within the project area. Therefore, potential impacts are consistent with those evaluated in the FMND.
Geology, Soils, and Seismicity	**No Impact:** The wetland mitigation site and access to it is within the study area of the project. Therefore, potential impacts are consistent with those evaluated in the FMND.

Hazards and Hazardous Materials	**No Impact:** The wetland mitigation work will not create new significant hazards or require new hazardous materials beyond those already considered in the Proponent's Environmental Assessment. Environmental protection measures will be implemented as described in the FMND. Therefore, potential impacts are consistent with those evaluated in the FMND.
Hydrology and Water Quality	**No Impact:** The wetland mitigation work to be performed is compensatory mitigation for project impacts to wetland SW2 and has been authorized by the ACOE, RWQCB, and CDFW. Measures to protect hydrology and water quality will be implemented as required by those authorizations and in accordance with hydrology measures in the FMND. Therefore, potential impacts are consistent with those evaluated in the FMND.
Land Use and Planning	**No Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not physically divide an established community nor conflict with any applicable plans. Therefore, potential impacts are consistent with those evaluated in the FMND.
Mineral Resources	**No Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not affect mineral resources. Therefore, potential impacts are consistent with those evaluated in the FMND.
Noise	**Potential Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not result in noise levels inconsistent with levels evaluated in the FMND. Therefore, potential impacts are consistent with those evaluated in the FMND.
Population and Housing	**No Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not affect population and housing. Therefore, potential impacts are consistent with those evaluated in the FMND.
Public Services	**No Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not affect public services. Therefore, potential impacts are consistent with those evaluated in the FMND.
Recreation	**No Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not affect recreation. Therefore, potential impacts are consistent with those evaluated in the FMND.
Transportation and Traffic	**Potential Impact:** The wetland mitigation site is immediately adjacent to the project site. Therefore, potential impacts are consistent with those evaluated in the FMND.
Utilities and Service Systems	**No Impact:** Creation of 0.05 acre of seasonal wetland and access to the wetland mitigation site will not affect public services. Therefore, potential impacts are consistent with those evaluated in the FMND.

- Existing tower
- Tower to be removed
- New tower location
- Existing wood pole(s)
- New TSP location
- Shoofly Circuit

Reconfigured power lines
(arrows show direction of flow)

- Crazy Horse Canyon-Hollister Nos. 1 & 2
- Crazy Horse Canyon-Salinas-Soledad Nos. 1 & 2
- Moss Landing-Crazy Horse Canyon Nos. 1 & 2

- Power line to be removed
- Existing transmission or power line
- Existing access road
- Switching Station & Access Road
- Grade and Fill Boundary
- Permanent workspace
- Temporary workspace
- Seasonal wetland
- Intermittent drainage

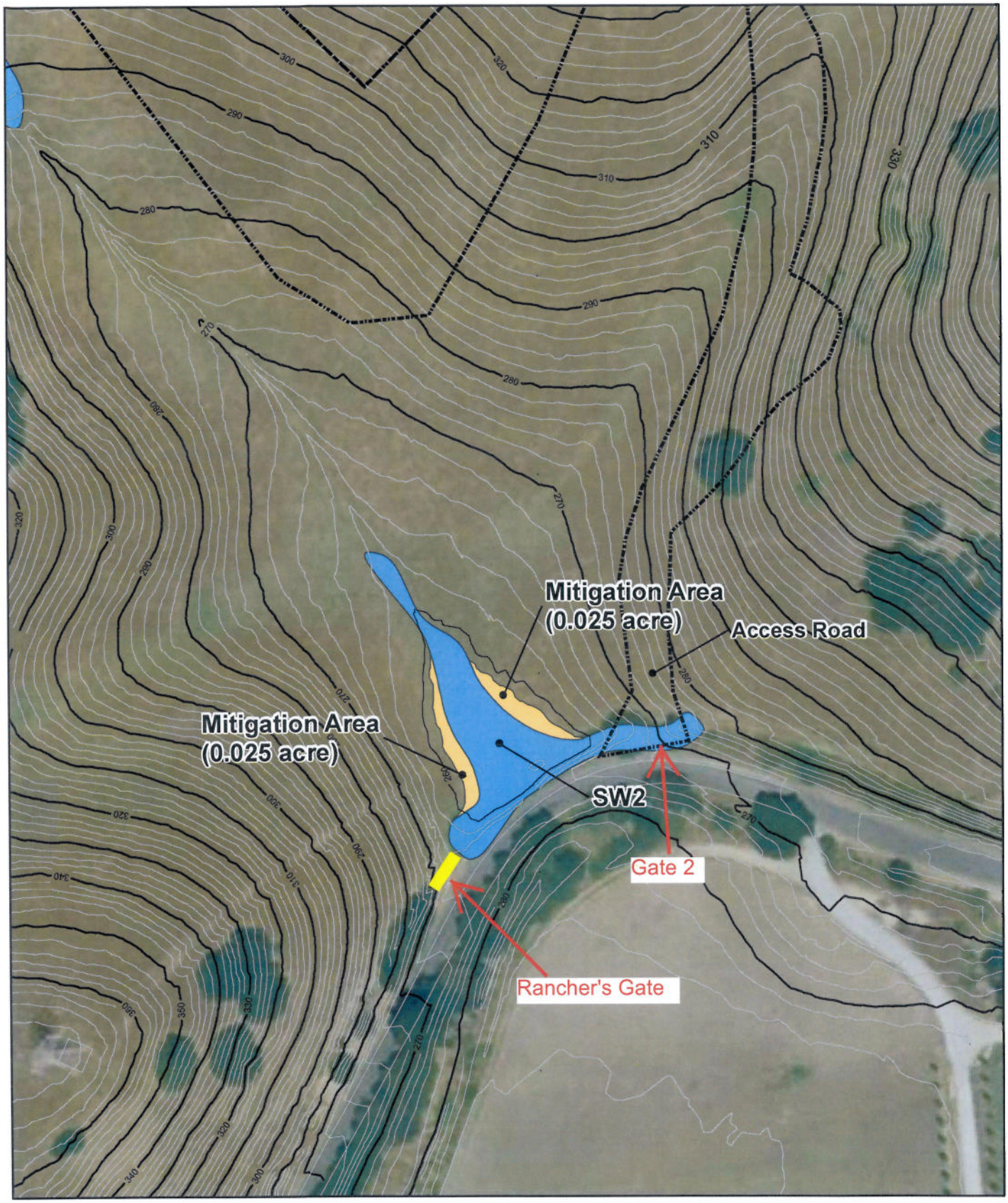
4/8/2013

Crazy Horse Canyon Switching Station Project

N

0 250 500 Feet

Scale = 1:4,800



Pacific Gas and Electric Company
WE DELIVER ENERGY.

Figure 2
Wetland Mitigation Exhibit
Crazy Horse Canyon Switching Station Project

Impact Area

N

0 55 110 ft

- Existing tower
- Tower to be removed
- New tower location
- Existing wood pole(s)
- New TSP location
- Shoofly Circuit
- Power line to be removed
- Existing transmission or power line
- Existing access road
- Switching Station & Access Road
- Grade and Fill Boundary
- Permanent workspace
- Temporary workspace
- Seasonal wetland
- Intermittent drainage
- Rancher"s Gate
- *Compensatory Wetland Mitigation Work Areas*

9/5/2013

Wetland Mitigation
Crazy Horse Canyon Switching Station Project

N

PG&E

0 250 500 Feet

Scale = 1:4,800

Attachment B

GANDA

Garcia and Associates
Natural and Cultural Resources Consultants
1 Saunders Avenue
San Anselmo, California 94960
Phone: 415.458.5803
Fax: 415.458.5829

To: Janet Liver, TRC Solutions
From: Cassidy DeBaker, Archaeologist, Garcia and Associates
Date: September 2013
RE: Cultural Resources Study for the Crazy Horse Canyon Project Modification 3

The purpose of this memorandum is to address cultural resources identification within work areas located within the Area of Direct Impacts (ADI) for the Crazy Horse Canyon Project in Monterey, California (Figure 1). The Project is located approximately 0.5 miles northeast of the intersection of Crazy Horse Canyon Road and San Juan Grade Road, at the convergence of numerous PG&E transmission lines. The proposed Project involves the construction of a switching station facility, access roads, the replacement of numerous towers and poles, and wetland mitigation and landscaping areas.

Garcia and Associates (GANDA) conducted a cultural resources investigation for the Project in 2010, which did not result in the identification of cultural resources within the ADI (Siskin et al. 2010). Due to the addition of work areas, GANDA archaeologists, Cassidy DeBaker (M.A.) and Julian Plath (B.A.), conducted an additional pedestrian survey on August 23, 2012, during which no cultural resources were found.

This study was conducted to address the requirements for review under the California Environmental Quality Act (CEQA). The purpose of this study was to conduct a pedestrian survey of the work areas depicted in Figure 1 and to identify and record cultural resources. Based on the background research and pedestrian survey conducted for this investigation, no cultural resources have been identified within the ADI.

Findings for this report are based on the following:

- review of the *Cultural Investigation for the Crazy Horse Switching Station Project, Monterey County, California* (Siskin et al. 2010); including the results of the records search and NAHC consultation.
- review of project maps and documentation regarding the new work areas; and
- a pedestrian survey of the ADI.

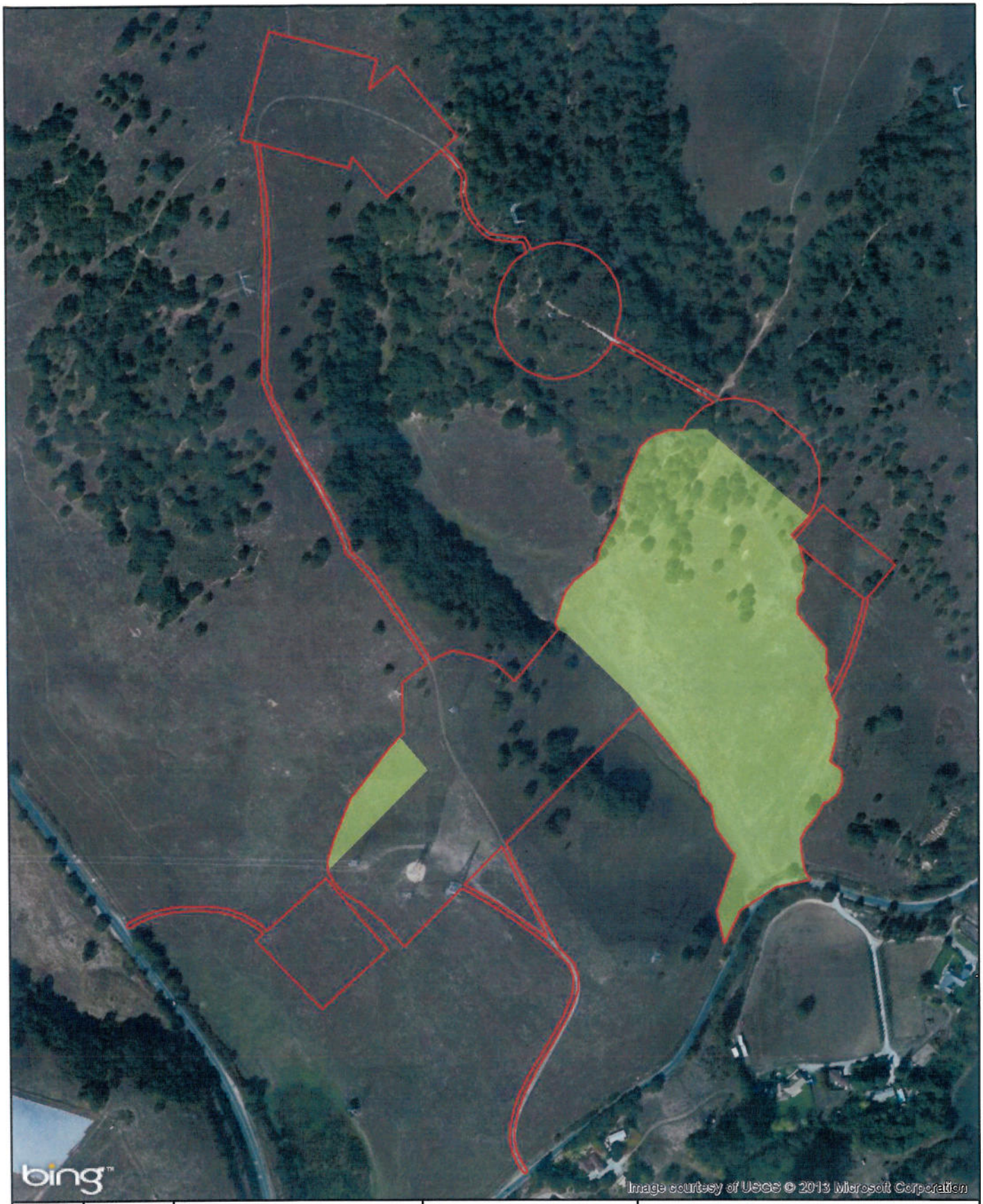


Figure 1. Crazy Horse Canyon Switching Station Mod 10 survey areas

Monterey County, CA
September 2013

Survey Methods

Archaeologists conducted an intensive-level pedestrian survey on August 23, 2012. Survey transects were completed at 30 foot intervals. C. DeBaker and J. Plath examined all visible ground surfaces within the work areas (Figure 1). Ground visibility was generally poor throughout and was obscured by grasses and poison oak. Ground visibility was greater in the southern portions of the work areas. Although limited by vegetation, no area was inaccessible, and survey coverage was 100 percent.

Recommendations

No additional recommendations are required beyond the mitigation measures specified in the Mitigated Negative Declaration (RMT, Inc. 2011).

REFERENCES

RMT, Inc.
2011 Crazy Horse Canyon Switching Station Final Initial Study/ Mitigated Negative Declaration. Prepared for the California Public Utilities Commission.

Siskin, B., DeBaker, C., Cox, B., Lang, J.
2010 *Cultural Investigation for the Crazy Horse Switching Station Project, Monterey County, California.* Prepared by Garcia and Associates, San Anselmo, California. Prepared for TRC Solutions.