

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 5, 2015

Robert Donovan
Senior Land Planner
Pacific Gas & Electric
Environmental Management - Transmission
245 Market Street, N10A
San Francisco, CA 94105

RE: Embarcadero-Potrero 230 kV Transmission Project (E-P): Minor Project Change #2

Dear Mr. Donovan,

On December 31, 2014, Pacific Gas and Electric Company (PG&E) submitted a request to the California Public Utilities Commission (CPUC) for a Minor Project Change for use of an existing staging and laydown yard two blocks from the Potrero Switchyard at 1215 Michigan Street, in the City of San Francisco, California.

The CPUC voted on January 16, 2014 to approve 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 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 MMCRP also acknowledges that temporary changes to the project, such as the need for additional workspace, are anticipated and common practice for construction efforts of this scale and that a Minor Project Change request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this Minor Project Change, and that no new impacts or increase in impact severity would result from the requested Minor Project Change activities.

Minor Project Changes are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. Minor Project Changes do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

Minor Project Change #2 for use of an existing staging and laydown yard (known as Sheedy's Drayage) at 1215 Michigan Street is granted by CPUC based on the factors described below.

PG&E Minor Project Change Request. Excerpts from the PG&E Minor Project Change request, received December 31, 2014, are presented below (indented):

Additional equipment storage area is needed for the Potrero Switchyard GIS building and switchyard work. The existing laydown and staging areas that have been approved for this project are not large enough to accommodate all of the required materials and equipment necessary to accomplish the switchyard work. Portions of the buildings where

storage was planned are not usable due to flooding and potential stability issues. ABB will rent space from an existing drayage firm, Sheedy's Drayage, on an existing paved area, two blocks from Potrero Switchyard.

The storage area described in this form is a commercially available staging area that is in the same vicinity as the project work areas, would use similar access, and is similarly already disturbed and paved.

Although this equipment storage area was not specifically mapped in the Final Initial Study/Mitigated Negative Declaration (IS/MND) that was prepared by the California Public Utilities Commission (CPUC), the IS/MND noted that additional off-site existing yard space may be used for the project and this space falls under that category (see IS/MND p. 4-47 "Existing commercially available office and yard space may be used by contractors or agencies"; and p. 4-11 "Commercially available off-site office and yard space may also be used.")

The site is entirely paved and is currently in use for Sheedy's Drayage storage (e.g. rigging, hauling, trucks). No potential for special-status species exists on-site. No soil disturbance will occur and therefore no cultural resources are potentially affected.

PG&E proposed to use this staging area since it is a regularly used storage area, is in the same vicinity as the Potrero Switchyard, 23rd Street, and Amador Yard, and has no biological or cultural impacts associated with its use.

CPUC Evaluation of Minor Project Change Request

In accordance with the MMCRP, the subject Minor Project Change request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested Minor Project Change activities. This review also included a visit of the subject site on January 5, 2015 by the CPUC Environmental Monitor (EM). The following discussion summarizes this analysis for biological, cultural, paleontological, and hydrological resources, and sensitive land uses/noise. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions and/or are proposed conditions by PG&E.

Biological Resources: The staging area is a paved fenced yard and not suitable habitat for any special-status species. No nesting passerines or raptors are active at this time. No additional impacts to biological resources are anticipated with the implementation of the conditions noted below.

Cultural and Paleontological Resources: Since the site is entirely paved and there is no ground disturbance involved, there are no cultural resources concerns for this staging and laydown yard.

There are no paleontological concerns for this staging and laydown yard as there will be no ground disturbance.

Hydrological Resources. The new staging and laydown area is bordered by the San Francisco Bay on the east side and will increase the acreage of the project. This site and acreage increase will be addressed in the SWPPP or SWPPP amendment. No impacts to hydrological resources are anticipated with the implementation of the conditions noted below.

Sensitive Land Uses/Noise. The new staging and laydown area is two blocks from the Potrero Switchyard in an industrial zoned area located on Michigan Street between 24th Street and 25th Street. The yard is an existing large paved yard used for vehicle and equipment storage. The general surrounding land use to the north, west, and south is industrial. At the northeast corner of the yard is a small park (Warm Water Cove) and to the east is the San Francisco Bay. The yard is surrounded on all sides by a fence.

The park and San Francisco Bay are separated from the staging and laydown area by a fence, and will not be disturbed by work activities. The new yard would not impose any further impacts already addressed in the Mitigated Negative Declaration. With the implementation of the conditions noted below, no significant impacts to sensitive land uses are anticipated.

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 Minor Project Change 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 yard.
- In accordance with Mitigation Measure B-4, between February 15 and August 31, “nesting survey sweeps” shall occur on a regular basis, as deemed appropriate by the level of nesting activity. If active nests are found, a Biological Monitor shall establish an appropriate buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The Biological Monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted with the approval of CDFW and USFWS, and with prior knowledge of the CPUC.
- 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.
- 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.
- The SWPPP or SWPPP amendment shall be submitted to the CPUC prior to occupation of the new staging and laydown yard.
- 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.

- If any unanticipated lane restrictions or closures are found to be necessary, prior proof of coordination with emergency service providers and all necessary permits shall be submitted to the CPUC.
- All complaints received by PG&E in regard to the yard 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.

Sincerely,



Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen