STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

November 14, 2014

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: Modification to Notice to Proceed #3

Dear Mr. Donovan,

On November 13, 2014, Pacific Gas and Electric Company (PG&E) submitted a request to the California Public Utilities Commission (CPUC) to modify Notice to Proceed #3 to trench from the new Potrero Switchyard to the existing switchyard for the 230kV/115kV connections across the Trans Bay Cable (TBC) of the Embarcadero-Potrero 230 kV Transmission Project, in the City of San Francisco, San Francisco County, California.

The PG&E Embarcadero – Potrero 230 kV Transmission Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures and applicant-proposed measures (APMs) described in the Final Mitigated Negative Declaration (MND) were adopted by the CPUC as conditions of project approvals. 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 CPUC voted on January 16, 2014 to approve the Final MND for 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 Embarcadero – Potrero Project will be constructed in 5 phases and NTPs will be issued for each phase. This is a typical process for transmission line projects. Given that the Embarcadero – Potrero Project has been approved by the CPUC, as described above, this phased construction review process allows PG&E to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented. The subject 230kV/115kV connections across the TBC was originally going to be requested under a future NTP; however, since the TBC is currently out of service for repairs because of an accidental break in the TBC near the Carquinez Straight, PG&E and TBC would like to take advantage of the outage and conduct engineering potholing and prepare the area for cable installation. Therefore, PG&E has submitted a Modification to NTP #3; NTP #3 allows for similar underground cable installations.

This letter documents the CPUC's thorough evaluation of all activities covered in this Modification to NTP #3. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision.

Modification to NTP #3 for the 230kV/115kV connections across the TBC for the Embarcadero- Potrero 230 kV Transmission Project is granted by the CPUC based on the factors described below.

**PG&E Modification of NTP #3 Request**

The CPUC has carefully reviewed the request for Modification to NTP #3 submitted by PG&E, and verified that it incorporates compliance with all applicable mitigation measures and APMs. Excerpts from the PG&E request for Modification of NTP #3 dated November 13, 2014 are presented as follows (indented):

> As shown on IS/MND Figure 4-16, Potrero Interconnection with 115 kV System, PG&E will be trenching connections from the new Potrero Switchyard to the existing switchyard for the 230kV/115kV connections, across the existing Trans Bay Cable (TBC). Since the TBC is currently out of service for repairs because of the accidental break in the TBC near the Carquinez Straight, PG&E and TBC would like to take advantage of the outage and conduct engineering potholing and prep the area for cable installation. PG&E is anticipating difficulties in obtaining outages from TBC in the future and this will provide needed flexibility to the schedule and reduce risk to the system.
>
> This work would follow the conditions of NTP #3 Duct Bank activities. Please note that given that this work consists entirely of removing concrete fill placed above the existing TBC line, no cultural monitoring would be required for this work.
>
> PG&E has the following objectives to accomplish while the TBC outage exists:
>
> 1. Pothole and probe to find the limits and composition of the backfill above the duct.
> 2. Determine the efficient lean concrete removal method with the least amount of vibration.
> 3. If outage time allows, remove the concrete trench backfill to depth needed for the crossings.
> 4. If FTB or concrete is removed, backfill to existing grade with readily removable material similar to the requirements for thermal sand backfill.

**CPUC Evaluation of Preconstruction Mitigation Implementation**

All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. For biological resources, those additional conditions are discussed and defined in this section. The Compliance Status Table in PG&E's NTPR provides preconstruction compliance information for the other issue areas addressed by the Embarcadero – Potrero MND.

Following the discussion of biological, cultural, paleontological, water resources, land use/sensitive receptors, a list of bulleted conditions is presented to define additional information and clarifications regarding outstanding requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions. In these cases, the conditions will not appear in the NTPR mitigation compliance table.

**Biological Resources**: The proposed 230 kV Potrero Switchyard site is a highly disturbed lot within the site of the former Potrero Power Plant site now owned by GenOn Energy, Inc., and adjacent to and east of the existing Potrero Switchyard. Vegetation in this area is largely limited to sparse ornamental shrubs and trees around the property and some minimal ruderal non-native vegetation within the site. There is no tree trimming or removal planned in this portion of the project area. There are no wetlands along the project route. The nearest known wetland is near Pier 96, about 0.5 miles south of Potrero Switchyard (Aspen 2013, MND 5-50). Nesting bird surveys will be conducted between February 15 and August 31. All construction personnel will receive biological resource training prior to starting work.

**Cultural**: The records search for prehistoric resources did not return any finds near the 230 KV Potrero Switchyard site. The subject work consists entirely of removing concrete fill placed above the existing TBC line, so no cultural monitoring would be required for this work. Historic resources have been documented near the Potrero Switchyard site and include surrounding buildings (Aspen 2013, MND 5-85). All construction personnel will receive cultural resource training prior to starting work. In the event that an unanticipated discovery of cultural materials is made, the find shall be managed in compliance with the *Archaeological Monitoring and Inadvertent Discovery Plan for the Potrero Portion of the Embarcadero-Potrero 230 kV Transmission Project, City of San Francisco, California* (July 2014 FINAL), prepared by Far Western Anthropological Research Group, Inc.

**Paleontological Resources:** Geologic mapping by Schlocker (1974) was used to determine the underlying geology for each of the project components. Potrero Switchyard area is underlain by artificial fill and Mesozoic serpentinite. Serpentinite is a metamorphic rock derived from ultramafic igneous rocks or sediments high in manganese and iron, and low in silica that have undergone high pressure and low temperature metamorphism. Metamorphic processes generally destroy any fossil material that may have been present in the parent rock; therefore, serpentinite is considered to have no paleontological sensitivity (Aspen 2013, MND 5-87 – 5-88).

**Water Resources**. PG&E has prepared an Erosion and Sediment Control Plan as part of a Stormwater Pollution Prevention Plan (SWPPP), which was approved by the San Francisco Public Utilities Commission on August 13, 2014. The Regional Water Quality Control Board has issued a Waste Discharge Identification (WDID) number for the Project (WDID# 2 38C370601). Erosion control and pollution prevention measures in the SWPPP address elements such as track-out controls, stock-pile handling, dewatering discharge, drain inlet protection, and replacement of any disturbed pavement or landscaping.

**Sensitive Land Uses/Noise**. The existing Potrero Switchyard is located on Illinois Street between 22nd and 23rd Streets in what is known as the Dogpatch neighborhood in the San Francisco Central Waterfront area (Aspen 2013, MND 4-35). The proposed 230 kV Potrero Switchyard is adjacent to and east of the existing switchyard and within the site of the former Potrero Power Plant site now owned by GenOn Energy, Inc. The nearest residence is about 700 feet to the west, on Third Street (Aspen 2013, MND 4-2) Construction notifications were provided to the public with tips on reducing noise intrusion, for example, by closing windows facing the planned construction. PG&E has also specified construction noise reduction measures that require the contractor to ensure all equipment is in good working order, adequately muffled, and maintained in accordance with the manufacturers' recommendations.

**Utilities and Service Systems.** Mitigation Measure (MM) UT-1 requires that underground utilities be protected and that PG&E coordinate with utility owners. PG&E has coordinated with all potentially impacted utility owners and will continue to do so as construction commences.

## Conditions of NTP Approval

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, NTP #3, and this Modification to NTP #3 shall be available on site for the duration of construction activities.

- All conditions of NTP #3 shall be followed with the exception of cultural monitoring due to the work area having disturbed soils and concrete fill above the TBC.

Sincerely,

Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen