

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 18, 2016

Jillian Blanchard  
Jo Lynn Lambert  
1325 High Street  
Alameda, CA 94501

**Subject:** Pacific Gas and Electric (U 39E) South of Palermo Reinforcement Project Application of a Permit To Construct (*Application No. A.15-xx-xxxx*)

Dear Ms. Blanchard:

The California Public Utilities Commission (CPUC), with technical assistance from Dudek, has reviewed Pacific Gas and Electric Permit to Construct (PTC) application, including the Proponent's Environmental Assessment (PEA), dated April, 2016, for the subject project. The CPUC's Information and Criteria List, Rule V. and PEA Checklist were used as a basis for evaluating completeness and ensuring that sufficient information has been provided to the CPUC to complete environmental analysis for the subject project, as required by the California Environmental Quality Act (CEQA).

After reviewing the materials submitted, the CPUC Energy Division finds that the information contained in the Proponents Environmental Assessment is currently incomplete. Attachment A identifies the areas of the application that were found to be deficient.

We would appreciate your response to the requested information in Attachment A in support of the analysis for the South of Palermo Reinforcement Project provided to Andrew Barnsdale (CPUC Energy Division) and Iain Fisher (Dudek) no later than June 17, 2016.

If you have any questions regarding this letter or need additional information, please contact me at 415.703.3221 or [Andrew.Barnsdale@cpuc.ca.gov](mailto:Andrew.Barnsdale@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Barnsdale", written over a horizontal line.

Andrew Barnsdale  
CPUC Project Manager

cc:

*Attachment A: PEA Completeness Review*

**ATTACHMENT A**  
**Permit to Construct**  
**PG&E South of Palermo Reinforcement Project**  
**Proponent's Environmental Assessment (PEA) Completeness Review**  
**Data Request 1.0**

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Data Request 1.0 reviews the PEA and accompanying appendices. This data request mirrors the layout of information in the PEA and the appendices. Consequently, requests may be duplicated or cross-referenced between sections, and resource specialist may be required to address data requests that originate from both the PEA and the associated appendices.

**ADMINISTRATIVE**

- a. Provide all agency involvement contacts and correspondence to date, including names, addresses, phone numbers, and email addresses.

**2.0 PROJECT DESCRIPTION**

**2.5 Proposed Project**

**2.5.6 Substations**

- a. Would any of the proposed upgrades to substations affect the bulk and scale of existing components within the existing substations?

**2.6 Project Components**

**2.6.2 New and Modified Structures**

**2.6.2.1 – South of Palermo Line**

- a. Please provide location and number of LSPs, and the number and location of angle TSPs with poured concrete bases.

**2.6.3 Temporary Structures**

- a. Please provide figures showing typical structures including height.
- b. Please provide the expected locations of guard structures, snub pole structures and shoofly; the response should focus on locations where temporary structures may affect sensitive resources for example delineated wetlands, or vernal pools.

**2.8 CONSTRUCTION**

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### General

- a. Please provide construction related water usage and sources where water would be obtained.

### 2.8.1 Pole and Tower Installation

#### 2.8.1.1 – Pole and Tower Installation

- a. Identify at which poles locations helicopters would be used, and at which pole locations the pole would be staged directly. For all poles, provide the location and footprint of work areas

#### 2.8.1.2 - Hybrid Poles, Tubular Steel Poles, and Lattice Steel Poles

- a. The CPUC understands that foundation laying and pole installation are likely to be undertaken in different seasons. Please provide a description of the expected timing for the installation of each component.
- b. Please clarify for which sections of the project conductor transfer would be required and for which sections new conductor will be installed.

#### 2.8.1.3 – Tower and Pole Removal

- a. Please clarify which towers are likely to be removed by helicopter and which are likely to be removed by crane.

### 2.8.3 Work Areas

- a. GIS information and Figure 2.8-1 provide locations of proposed helicopter landing sites and pull sites. Please provide the footprint for each helicopter landing zone and pull site. Further, please provide the GIS data for the locations, and footprints of staging areas.
- b. Please provide total temporary and permanent work area requirements for each segment broken down into 1) direct pole bury site, 2) work areas: staging areas, pull sites, helicopter landing zones etc. and 3) new temporary access.
- c. Temporary work areas described in this section do not match the pole/tower work areas described in Table 2.8-1. Please clarify which estimates are correct.

### 2.8.4 Pull Sites

- a. The analysis should demonstrate that locations avoid resources, please provide footprints for pull sites, and Temporary laydown yards.

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- b. Please identify locations where crop and orchard tree removal may be necessary, and the extent to which it may be required.
- c. Please identify temporary staging and landing zones or pull sites that would be used for greater than a single season.

#### **2.8.5 Helicopter Use**

- a. Hours of daily helicopter use is given in the Helicopter Use Plan, please provide the expected number of days that helicopters would be used in the wet season work, and the number of days that helicopters would be used during the dry season work.
- b. The analysis should demonstrate that helicopter landing zones avoid sensitive resources, please provide footprints for helicopter landing zones.

#### **2.8.6 Access Routes**

- a. The GIS layers provide a mapped route to each work area, please specify the anticipated improvements required for each route and where necessary the likely crossing of wetlands and creeks in each case.
- b. Quantify the area (length and overall acreage) of new temporary overland access routes and specify if these routes would be used for more than one season
- c. Please identify temporary wetland and creek crossings
- d. Quantify the area (length and overall acreage) of new temporary overland access routes and other temporary disturbance specify if any of these disturbance areas would be within recreational facilities or parks and how long they would be used or number of times if they would be used for more than a single season.

#### **2.8.10 Schedule**

- a. Please provide typical durations of the following construction activities at each location:
  - Construction, staging areas and temporary roads;
  - Existing tower removal;
  - Pole base excavation, concrete base pouring, new pole installation;
  - Staging area and temporary construction restoration.
- b. Section 3.3 – Air Quality indicates that construction will be undertaken across four years, with a land-based construction phase and a helicopter based construction phase. Please indicate/map which sections of the project are likely to be under construction in each year and each phase.
- c. For laydown yards, pull sites and helicopter landing zones provide the timing and duration of use, i.e., which year and which phase.

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- d. Please provide duration and workforce and equipment expected to be used for post-construction cleanup and longer-term restoration work. This should include any anticipated restoration / mitigation projects required as terms and conditions of Clean Water Act or Endangered Species Act permitting and monitoring.

### 3.0 ENVIRONMENTAL IMPACT ASSESSMENT SUMMARY

#### 3.1 Aesthetics

- a. Please provide individual, high-quality JPEG and/or PDF files for all existing character photographs and visual simulations included in the PEA. Please also provide data points (.kmz, .kml, or .shp file format) for all character photographs and key observation points depicted on Figure 3.1-1, Landscape Units and Photograph Viewpoint Locations.
- b. A variety of aluminum-based conductors including all aluminum (AA), aluminum conductor steel-reinforced (ACSR), and aluminum conductor steel supported (ACSS) are proposed yet information regarding the reflectivity of the conductor has not been provided. Please provide a relative comparison of conductor reflectivity for existing and proposed conductors.
- c. The PEA states that the focus of Landscape Unit 1 is “the unincorporated community of Palermo and the farmland of the northern Sacramento Valley” and presents a single visual simulation of the South Palermo Line to represent the anticipated visual change within the relatively large landscape unit. Please provide a visual simulation of the Pease Sub Line Segment from character photograph location 7 to better illustrate the visual character of the area and anticipated visual change.
- d. The PEA states that the largest potentially affected viewer group in the project area is motorists yet a visual simulation from a high volume roadway such as SR-70 has not been established. To depict the visual change anticipated to be experienced by motorists on regional transportation facilities, please provide a visual simulation of the South Palermo Line at character photograph location 20.
- e. Section 3.1.4.4 (d) Nighttime Lighting states that if needed, “portable construction lighting will be used to illuminate the immediate work area and will be directed down and away from residences, motorists, and other sensitive viewers.” To ensure adequate protection of the dark –sky environment unnecessary light spillover, as-needed lighting should also be shielded. The use of shielded, downward directed lighting (during necessary nighttime construction activities) should also be included as an Applicant Proposed Measure (PEA) to ensure enforceability and a commitment of the Project Applicant.

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### 3.2 Agricultural and Forestry Resources

There are no further data needs regarding agricultural resources.

### 3.3 Air Quality

- a. Please confirm that the phases, acres disturbed, equipment, workers, and trucks modeled for the Air Quality and Greenhouse Gas chapters match the Project Description, including Table 2.8-2 (Typical Construction Workers and Equipment). Confirm also that helicopter use assumptions match the data in the Helicopter Use Plan.
- b. The Air Quality and Greenhouse Gas Calculations document includes many assumptions based on PG&E input (“PG&E has provided preliminary phasing information, including the projected construction schedule, equipment, grading quantities, and number of truck trips” (PEA p. 3.3-5). However, these assumptions are only briefly mentioned in the PEA chapter and embedded throughout the 364-page Air Quality and Greenhouse Gas Calculations document. For clarity and consistency between PEA chapters, these assumptions should be summarized in the Project Description.

### 3.4 Biological Resources

- a. Please provide maps of potential wetlands and waters (including acreages) and completed wetland delineation. Confirm wetland delineation has been verified (or is in the process of verification) (PEA p. 3.4-9, 3.4-11).
- b. Please provide figures and GIS layers depicting potential VP branchiopod habitat, GGS habitat, yellow billed cuckoo habitat, locations of elderberry bushes and special-status plant habitat (PEA p. 3.4-10).
- c. Please provide VP branchiopod survey report (PEA p. 3.4-10).
- d. Please provide vegetation communities/land covers figure (PEA p. 3.4-9), and accompanying GIS layers.
- e. Confirm special-status plant surveys were completed in Spring 2016 and please provide the related report) (PEA p. 3.4-11).

### 3.5 Cultural Resources

- a. Provide cultural resources evaluation report.
- b. Provide DPR forms for evaluated built environment resources.

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- c. Provide map of cultural resources within APE showing avoided significant/ unevaluated resources and not significant resources.

### **3.6 Geology and Soils**

There are no further data needs regarding geology and soils. The preliminary geologic/geotechnical information provided as an attachment to the PEA is sufficient for initial planning/permitting needs.

### **3.7 Greenhouse Gas Emissions**

- a. Requests for 3.3 (Air Quality) above also apply to the Greenhouse Gas analysis.
- b. The Greenhouse Gas chapter of the PEA notes that both EMFAC2014 and EMFAC2011 were used for on-road vehicle emissions (PEA pps. 3.7-4 and 3.7-8, respectively). The Air Quality chapter identifies EMFAC2014 as the model used to estimate on-road vehicle emissions (PEA p. 3.3-5). Please confirm which model version and emission factors were used for the analysis.

### **3.8 Hazards and Hazardous Materials**

- a. Discuss Fire Hazard Severity Zone classifications for local responsibility area (LRA) in addition to those for state responsibility areas (SRA), as classified by CAL FIRE.
- b. The PEA (pages 3.8-2 through 3.8-6) identifies state regulations addressing fire prevention/fire hazards for power line construction and maintenance, specifying those applicable to SRA. Provide a discussion of applicable federal and local wildfire prevention regulations as well as a discussion of applicable state regulations for non-SRA lands.
- c. The PEA (page 3.8-19) states that “Fire prevention actions will be taken during construction to reduce the wildland fire risk, especially in the moderate and high fire-hazard severity zones.” Provide specific details of the fire prevention actions, how and when they will be implemented, relationship to proposed construction equipment, potential ignition sources (vehicles, equipment, line break), required plans and permits, and a discussion of responsible parties and those with enforcement responsibility. Additionally, clarify whether fire prevention actions are proposed in all project areas, or only in SRA.
- d. The PEA (page 3.8-19) states that “O&M fire risks will not change materially with completion of the project, and no new impacts associated with operations will occur.” Provide specific details regarding current O&M fire risk mitigation and how it applies to the proposed project.

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### 3.9 Hydrology and Water Quality

- a. Section 3.9.3.3 of the PEA identifies the surface waters that cross the project alignment. The PEA should identify where and how many times the physical footprint intersects any of these creeks, sloughs, or rivers (e.g., tower foundations and temporary construction support areas, including staging and laydown areas, access roads, pull pads, and helicopter landing zones).
- b. For existing routes requiring improvement or temporary overland access routes that cross water features, the PEA should provide additional information regarding the construction methods to be used to facilitate the crossing.

### 3.10 Land Use and Planning

- a. The following information, as requested in the PEA check list, should be provided as part of the follow up submission: GIS data of all parcels within 300 feet of the Proposed Project with the following information: APN number, mailing address, and parcel's physical address.

### 3.11 Minerals

There are no further data needs regarding mineral resources.

### 3.12 Noise

- a. Please provide equations or a spreadsheet to document the construction noise level results presented in Table 3.12-5; please include construction noise levels at 10 feet in such equations or spreadsheet, and update the table to illustrate noise levels at 10 feet.
- b. Page 3.12-12 (last full paragraph). The helicopter noise discussion addresses only level flight operations applicable to transport of materials, or hovering during support structure installation or removal. Please provide analysis of noise levels associated with helicopter take-off and landing operations, combined with other construction equipment which may be operating at the landing zone sites. Provide reference distance from landing sites to the closest sensitive receptors (residence or school).
- c. Page 3.12-13 (1<sup>st</sup> paragraph). Please clarify the meaning of 'very short-term' with regard to necessary nighttime construction; is this short-term with respect to the 9-hour overnight period, or short-term with respect to a limited number of consecutive nights over which the construction would occur?

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### 3.13 Population and Housing

- a. Please provide duration and workforce and equipment expected to be used for post-construction cleanup and longer-term restoration work. This should include any anticipated restoration / mitigation projects required as terms and conditions of Clean Water Act or Endangered Species Act permitting and monitoring. This comment also provided for Section 2.8.10.
- b. Please describe typical accommodations used to house construction crews and availability of those accommodations in the project area (general quantification of rooms and vacancy rates).

### 3.14 Public Services

- a. See comment 3.13.a, above.

### 3.15 Recreation

No further data is needed to evaluate impacts associated with utilities are required at this time.

### 3.16 Transportation and Traffic

- a. Please confirm that the *Butte County Setting and Trends Report* (Butte County 2010) is the source document for LOS information provided in the PEA on page 3.16-6 for Upper Palermo Road, Lincoln Boulevard, Palermo Road, and Lower Honcut Road. Also, the LOS data referenced in the PEA for local Butte County roads of regional significance is approximately 10 years old. Please detail as to whether any contact was made with Butte County staff regarding more recent LOS data for the roadways crossed by the Project.
- b. Please confirm that the *Yuba County General Plan Update Background Report* (Yuba County 2007a) and the *Sutter County General Plan Technical Background Report* (Sutter County 2008) are the source documents for LOS information provided in the PEA on page 3.16-7 for Ramirez Road, Hammonton Smartville Road, North Beale Road, Erle Road, McGowan Parkway, Arboga Road, and Feather River Boulevard (Yuba County) and for Rio Oso Road and Pleasant Grove Road (Sutter County). Also, the LOS data referenced in the PEA for Yuba and Sutter County roadways is approximately 10 years old. Please detail as to whether any contact was made with Yuba and Sutter County staff regarding more recent LOS data for the roadways crossed by the Project.
- c. Please detail as to whether any contact was made with City of Oroville, City of Marysville, and Yuba City staff regarding LOS data for City roadways crossed by the

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Project. If contact was made, please provide information gathered regarding current LOS for roadways in these jurisdictions.

- d. Please provide the locations of poles in the system at which helicopter use is not feasible and the use of cranes is required.
- e. Please provide information (dimensions, materiality, etc.) of crossing structures. How long would crossing structures be installed during construction activities?
- f. Please provide locations where temporary vehicle and bike lane closures may be required. What is the approximate duration of construction lane closures? APM TRA-1 should include language that states any lane closures of delayed service will be coordinated with affected transit agencies so that they may inform transit riders of potential delays.
- g. Please state whether construction activities are anticipated to result in access driveway closures at private residences. If temporary closures are anticipated, describe what measures would be implemented during construction to ensure safety at construction access driveways. A general description of site access safety measures from the traffic management plan should be provided.
- h. Identify Caltrans BMPs that would be used to minimize traffic impacts. This can be a general description or summary of measures.

### **3.17 Utilities and Service Systems**

No further data is needed to evaluate impacts associated with utilities are required at this time.

### **3.18 Mandatory Findings of Significance and Cumulative Impact Analysis**

No further data is needed to evaluate impacts associated with utilities are required at this time.

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