

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 25, 2019

Mr. David Thomas
245 Market Street, Room 1054D
San Francisco, CA 94105

RE: Minor Project Refinement #16 for the Fulton-Fitch Mountain Reconductoring Project

Dear Mr. Thomas,

Pursuant to the California Environmental Quality Act (CEQA), the California Public Utilities Commission (CPUC) prepared an Initial Study/Mitigated Negative Declaration (IS/MND) for Pacific Gas and Electric Company's (PG&E's) Fulton-Fitch Mountain Reconductoring Project (A. 15-12-005). On December 18, 2017, the CPUC issued a decision to adopt the Final IS/MND and grant PG&E a Permit to Construct the project (Decision D.17-12-012). Following its initial decision, the CPUC prepared a Supplemental IS/MND to address project changes proposed by PG&E, which was adopted on September 12, 2019.

The CPUC adopted the mitigation measures (MMs) and applicant proposed measures (APMs) identified in the 2017 IS/MND (with revisions identified in the 2019 Supplemental IS/MND) as conditions of project approval, as well as a Mitigation Monitoring and Reporting Program (MMRP) to ensure compliance with the MMs and APMs pursuant to Public Resources Code § 21081.6 and § 15097 of the CEQA Guidelines. A detailed Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) was developed for the project with direct participation with PG&E staff. The MMCRP defines specific procedures that are part of the adopted program including the Minor Project Refinement (MPR) process, which requires PG&E to obtain CPUC authorization for any deviations from the approved project.

On November 15, 2019, PG&E submitted MPR #16 requesting CPUC authorization to install grounding lines at Geysers #17-Fulton 230-kV Tower 024/100 (Tower 100) located east of Pole 23. The CPUC conducted a CEQA consistency review for MPR #16 following the procedures set forth in the MMCRP. A copy of the MPR review form is provided as Attachment 1, which describes the proposed actions and the CPUC's consistency review analysis. This letter serves to inform you that the CPUC has reviewed and approved PG&E's request for MPR #16 on the basis that no new or substantially greater impacts would occur beyond those previously analyzed in the 2017 IS/MND and 2019 Supplemental IS/MND.

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Please direct any questions related to this matter to me at 415-703-1966 or
lisa.orsaba@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lisa Orsaba', with a horizontal line extending to the right.

Lisa Orsaba
Project Manager
Energy Division, CEQA Unit

cc: Jo Lynn Lambert, PG&E Attorney
Aaron Lui, Project Manager, Panorama Environmental, Inc.

Attachment 1: CPUC Review of MPR #16

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Part A: Request Description

MPR Request

Request Number: 16

Date Requested: November 15, 2019

**Proposed Duration/
Timing of Use:** September 1, 2019 to March 1, 2020
Monday-Sunday; 7:00 AM to 6:00 PM

Location: Geysers-Fulton 230-kV Tower 024/100 (Tower 100) within Shiloh Ranch Regional Park
400 feet of existing access (fire road); 100 feet of overland access; and, an approximately 0.04-acre parking and turnaround area

Attached Map? Yes No

Proposed Action(s)

1. PG&E proposes to install temporary grounding rods and wire at Tower 100 to support pole and conductor replacement at Pole 23. Tower 100 is located roughly 200 feet east of Pull Site-6 (PS-6) and 500 feet east of Pole 23. The work will involve a crew of up to 6 linemen that would access the tower via a pickup truck and then manually climb the tower to install 6 grounding lines. The pickup truck would utilize the existing fire road east of PS-6 (400 feet) and a short overland access route (100 feet) to the base of the tower, where a small parking and turnaround area would be located (0.04 acre). No road improvements or vegetation removal would be necessary. No ground disturbance beyond a pickup truck driving over the existing dirt and overland access roads would occur.
 2. PG&E proposes to replace existing ceramic dead-end insulators installed on Tower 100 that support the with new insulators similar to those installed on other poles in the Southern Segment. Access to replace the insulators would be achieved via a single light-duty helicopter with crews suspended on a long line. No ground disturbance or vegetation removal would occur.
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Purpose(s)

1. Installing temporary grounding lines at Tower 100 is necessary to ensure safe work on the Geysers-Fulton 230-kV line between Poles 21 and 23 in accordance with standard transmission line construction practices.
 2. Insulators on Tower 100 must be replaced as part of the reconductoring process between Poles 21 and 23 to ensure safe conductor tensioning and proper conductor sagging. Because Pole 23 is being repositioned the distance between Pole 23 and Tower 100 will increase as will the length of conductor. Helicopters would be used for speed and to avoid substantial ground and vegetation disturbance that would occur if a crane was used.
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Part B: Existing Conditions

Existing Land Uses: Regional Park

Surrounding Land Uses: Coast Live Oak Woodland, Regional Park

Sensitive Receptors within 500 feet: Approximately 9 properties, some with residential structures, are within 500 feet of LZ-2, Poles 21-23, and Tower 100 where associated work would occur.

Environmental Recourses within 500 feet: Seasonal Watercourse SEW-1 and mapped habitat for California red-legged frog (CRLF) habitat located within 500 feet.

Has landowner approval been granted? Yes No N/A

Landowner: Sonoma County Parks District (APN 067-260-032)

Surveys

List any new survey reports under Part D, attach a copy, and describe relevant survey details under the applicable resource category listed in the Part E.

Biological Resources. Were all sites associated with the proposed action(s) surveyed for biological resources with the potential to occur in the area? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season to detect resources? If not, describe under the applicable resource category in Part E.

The proposed access route and Tower 100 are located immediately east of PS-6 (refer to Figure 1) and just outside of the biological survey area identified in the IS/MND. On November 1, 2019, an approved biologist (Michael Scaffidi, Surf to Snow) conducted a survey for special-status species and potential bat roosts at the proposed access and work area sites. No special-status species or bat roosts were identified in the area. The proposed work areas contain oak woodland and seasonal watercourses that are considered potentially suitable habitat for special-status species known to occur in the area, including CRLF upland habitat. Refer to discussion under Part E, Biological Resources for additional information regarding preconstruction survey requirements.

Cultural Resources. Were all sites associated with the proposed action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?

On November 15, 2019, an approved archeologist (Erin Sherlock, Stantec) conducted a pedestrian cultural survey at the proposed access and work area sites. Results of surveys were negative. PG&E provided a survey report with the MPR #16 request package.

Jurisdictional Waters. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?

SEW-1 is within 500 feet of the proposed access and work area sites. SEW-1 is a jurisdictional water feature and has been mapped as potentially suitable habitat for CRLF. No additional hydrological resources were identified during pedestrian surveys of the proposed work area.

Part C: Permits, Agency Approvals, and Environmental Protection Measures

List any new permits or agency approvals under Part D, attach a copy, and describe relevant details under the applicable resource category listed in Part E.

Have all required permits, permit amendments/authorizations, or agency approvals been issued by resource agencies with applicable jurisdiction? Describe if necessary.

The proposed activities would involve light-duty helicopter work within 500 feet of residential properties and structures. The closest residential structure to Pole 23 is located approximately 150 feet southwest. The closest residential structure to Tower 100 is located approximately 400 feet south. Prior to conducting helicopter activities in the Southern Segment, the CPUC required that PG&E provide either (1) a Federal

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Aviation Administration (FAA) approved Congested Area Plan or (2) written confirmation that FAA will not require a Congested Area Plan for the helicopter activities. This requirement was made a condition of approval for Notice to Proceed #4.

On November 18, 2019, PG&E reported that their helicopter contractor for the project, PJ Helicopter, spoke with FAA over the phone and that the FAA stated no Congested Area Plan is needed, but that PJ Helicopter should implement safety measures which include traffic controls, land owner notifications, and potentially evacuation of homes if a medium- to heavy-duty helicopter was used. PG&E also provided an additional FAA notification letter dated November 22, 2019, which included similar information from the previous documentation. PG&E issued notifications to adjacent landowners and residents on November 20 and 21, 2019. In addition, PG&E will work with the closest resident near Pole 23 to temporarily evacuate their home during the short duration of the helicopter activities as an additional safety precaution, even though an evacuation is not required.

All other applicable permits and agency approvals have been issued for the proposed work.

Would the proposed action(s) conflict with permit conditions or agency approvals? Describe if necessary.

No

Would the proposed action(s) conflict with project applicant proposed measures or mitigation measures listed in Final Initial Study/Mitigated Negative Declaration (IS/MND)? Describe if necessary.

No

Part D: Attached Materials

List any attached materials (e.g. surveys, maps, photos, memos, agency authorizations, etc.) below. Materials should be attached to the end of this form.

Attachment A: Cultural Survey Memo (Stantec November 2019)

Part E: Final IS/MND Consistency Summary

Complete the Final IS/MND Consistency Summary below and answer the consistency questions for each resource category. Include a description and justification below each resource category as necessary. The consistency questions were developed using the CEQA Checklist provided in the Final IS/MND. Refer to the Final IS/MND for the details on the project impact evaluation.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact on:	No Change	Potentially Significant Change	N/A
Aesthetics (e.g., damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)? <i>Final IS/MND evaluation: Less than Significant with Mitigation</i> The proposed actions would include use of an overland access route by one pickup truck and helicopter work for insulator replacement. These activities would be temporary and limited to the duration of construction. The appearance of the new insulators would be similar to existing insulators on the tower and other poles in the Southern Segment. The proposed work would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)? <i>Final IS/MND evaluation: Less than Significant with Mitigation</i> The proposed access and work area sites are located on land with the same Farmland and agricultural land use designations as Pole 23 and PS-6. These areas are located within Shiloh Ranch Regional Park	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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and no agricultural operations occur at the location. The proposed work activities would not result in a new impact or increase the severity of a previously analyzed impact on agricultural resources.

Air Quality (e.g. produce additional emissions, or expose sensitive receptors to additional pollutants)?

Final IS/MND evaluation: Less than Significant

Use of helicopters and the access route would generate equipment emissions and fugitive dust. Impacts associated with helicopter emissions and dust generation were addressed in the IS/MND. APM AIR-1 (fugitive dust control measures) would ensure that impacts from fugitive dust would be minimized and impacts to air quality would remain less than significant. The minor levels of additional equipment use would not change the emissions estimates or impact determinations presented in the IS/MND. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

Biological Resources (e.g., cause an adverse effect to sensitive or special-status species, or impact riparian, wetland, or any other sensitive habitat, or conflict with local policies or ordinances protecting biological resources)?

Final IS/MND evaluation: Less than Significant with Mitigation

As described under Part B (Surveys), the proposed access and work area sites are outside the biological study area identified in the IS/MND; the areas were surveyed prior to submitting the MPR request and the results were negative. No special-status species are known to occur in the area; however, the sites are within and adjacent to potentially suitable habitat for special-status species like the adjacent work areas (PS-6 and Pole 23), including oak woodland and potentially suitable upland habitat for CRLF. The proposed actions would not involve vegetation removal and only minor surface disturbance would occur from a pickup truck driving over dry grassland for approximately 100 feet.

Preconstruction surveys would be conducted immediately prior to construction activities to detect and avoid any special-status wildlife that may be present, as specified in APM BIO-7 (California tiger salamander), APM BIO-8 (American badger), APM BIO-9 (western pond turtle), MM BIO-3 (CRLF), MM BIO-4 (foothill yellow-legged frog), and MM BIO-5 (special-status and nesting birds). The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

Cultural and Tribal Cultural Resources (e.g., cause adverse change to a historical, archeological, or tribal cultural resource)?

Final IS/MND evaluation: Less than Significant with Mitigation

As described under Part B (Surveys), the proposed access and work area sites are outside of the previous cultural resource study area identified in the IS/MND; the areas were surveyed prior to submitting the MPR request and the results were negative (see Attachment A). No excavation would occur and any ground disturbance from the use of a pickup truck would be minimal; therefore, the potential for encountering previously undiscovered cultural resources is low. In the event that a potential cultural resource is discovered, MM Cultural-1 (procedures for cultural resource discoveries) would be implemented to ensure impacts would be less than significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on cultural or tribal resources.

Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)?

Final IS/MND evaluation: Less than Significant with Mitigation

The proposed activities would not involve excavation that could result in the loss of topsoil or increased erosion. Ground disturbance would be minimal and limited to tire tracks of the pickup truck through an existing access road and overland route. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on geology and soils.

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Greenhouse Gas Emissions (e.g., generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment)?

Final IS/MND evaluation: Less than Significant with Mitigation

The proposed activities would not result in a substantial increase in the level of equipment use and run time of equipment. The estimated greenhouse gas emissions and associated impacts would be consistent those described in the IS/MND. APM AIR-2 (exhaust emission control measures) would be implemented to ensure that impacts from greenhouse gas emissions would remain less than significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact associated with greenhouse gas emissions.

Hazards and Hazardous Materials (e.g., create or increase the exposure of people or structures to hazardous materials or wildland fires, involve the use of additional hazardous materials or equipment, or interfere with an adopted emergency plan)?

Final IS/MND evaluation: Less than Significant with Mitigation

Hazardous materials, such as fuels, oils, and lubricants, would be used by the truck and helicopter involved with the proposed activities. The use of these and other materials was addressed in the IS/MND. The proposed activities would occur within and near densely vegetated areas in Shiloh Park where there is an elevated risk of wildfires. The risk of wildfire ignitions during construction was previously analyzed in the IS/MND. Implementation of APM HM-3 (smoking restrictions), APM HM-4 (carry emergency fire suppression equipment), MM Hazards-1 (hazardous materials procedures and worker training), and MM Hazards-2 (develop and implement construction fire prevention plan) would ensure impacts from hazards and hazardous materials are less than significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact associated with hazards and hazardous materials.

Hydrology and Water Quality (e.g., degrade water quality, discharge waste or sediment, deplete groundwater, alter the existing drainage pattern, create additional runoff water or polluted runoff, place structures in a 100-year flood hazard area, or expose people or structures to a significant risk involving flooding)?

Final IS/MND evaluation: Less than Significant with Mitigation

The proposed access and work area sites do not cross any water features or potentially jurisdictional wetlands. SEW-1 occurs within 500 feet of the proposed work area and would be completely avoided. No gravel or other erodible materials would be installed, and minimal ground disturbance would occur. MM Hydrology-1 (SWPPP development and implementation) and MM Hydrology-2 (SWPPP monitoring program) would be implemented to ensure impacts on water features and water quality would be less than significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

Land Use (e.g., conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)?

Final IS/MND evaluation: Less than Significant with Mitigation

The proposed activities would be located within Shiloh Ranch Regional Park near Pole 23 and immediately adjacent to PS-6. The proposed activities would have no effect on land use or zoning designations. Potential incidental impacts to special-status species are permitted under PG&E's Bay Area Habitat Conservation Plan. All applicable measures described in PG&E's Habitat Conservation plan would be followed. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on land use and planning.

Noise (e.g., expose sensitive receptors to additional noise or vibration)?

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Final IS/MND evaluation: Less than Significant with Mitigation

The proposed activities would generate the same noise levels associated with vehicle and helicopter use that were analyzed in the IS/MND. The proposed helicopter work would occur within Shiloh Ranch Regional Park and would not expose additional receptors to noise levels beyond those described in the IS/MND. Impacts from noise would be reduced to less-than-significant levels with implementation of MM Noise-1 (noise generation and exposure limits, and address noise complaints) and MM Noise-3 (minimize disruptive helicopter noise).

On November 20 and 21, 2019, PG&E provided written notifications to approximately 9 property owners and residences within 500 feet of LZ-2, Poles 21-23, and Tower 100 informing them of upcoming helicopter activities in accordance with MM Noise-3. The notifications were provided less than 30 days prior to helicopter activities, as specified in MM Noise-3; however, it was determined that providing advanced notice within 5 to 6 days prior to the helicopter activities would not reduce the effectiveness of the notification that is intended to reduce surprise and noise disturbance.

The duration of the proposed helicopter activities would be approximately one day or less and would not result in substantial noise levels or noise exposure beyond those analyzed in the IS/MND. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact associated with noise.

Paleontological Resources (e.g., cause adverse change to a paleontological resource or site or unique geologic feature)?

Final IS/MND evaluation: Less than Significant with Mitigation

The proposed activities would be located in an area of high paleontological sensitivity. Minimal surface disturbance would occur from driving one vehicle over the proposed access route. No excavation would occur. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on paleontological resources.

Population and Housing (e.g., induce substantial population growth in an area, or displace substantial numbers of people or housing)?

Final IS/MND evaluation: Less than Significant with Mitigation

The proposed activities would not result in any impacts on population and housing. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on population and housing.

Recreation (e.g., increases the use of, or cause adverse effects to, parks or other recreational facilities)?

Final IS/MND evaluation: Less than Significant with Mitigation

The proposed activities are located within Shiloh Ranch Regional Park. Temporary trail closures may be necessary to allow safe execution of the proposed activities consistent with those conducted at PS-6 and Pole 23, as analyzed in the IS/MND. APM REC-1 (coordination with park management and signage), MM Recreation-1 (trail conditions and repairs), MM Recreation-2 (trail detours and notifications), MM Biology-7 (revegetation, restoration, and monitoring plan), MM Traffic-1 (construction traffic management), and MM Traffic-2 (overhead safety procedures) would be implemented to ensure impacts associated with trail closures remain less-than-significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on recreation.

Transportation and Traffic (e.g., increase traffic congestion or degrade performance of the circulation system, taking into account all modes of transportation, or increase hazards due to a design feature)?

Final IS/MND evaluation: Less than Significant with Mitigation

The proposed activities would occur within Shiloh Ranch Regional Park and would not occur within public roads. No additional vehicle trips would be generated. As described under Part C, the proposed activities would involve helicopter work within 500 feet of residential properties and structures. PG&E's helicopter operator coordinated with the FAA who determined that a Congested Area Plan is not

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required, but safety measures should be implemented, including the notification of adjacent residents and traffic control. In addition, PG&E will work with the closest resident near Pole 23 to temporarily evacuate their home during the short duration of the helicopter activities as an additional safety precaution. On November 20, 2019 PG&E provided a written notice to the resident requesting that they vacate the property on November 25, from 8:00 am to 5:00 pm, although helicopter work is expected to occur for only a few hours. Coordinating with residences to temporarily evacuate structures for helicopter safety is specified in MM Traffic-2. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

Utilities and Public Services (e.g., result in construction of new, or expansion of existing, water facilities, stormwater drainage facilities, require additional water entitlements, or creation of new solid waste disposal needs)?

Final IS/MND evaluation: Less than Significant with Mitigation

The proposed activities would not include the construction or expansion of water or stormwater drainage facilities; require additional water entitlements; or, creation of new solid waste disposal needs. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on utilities and public services.

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Figure 1: Map of proposed Work Area



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Photo 1. Tower Grounding



Photo 2: Vehicle turnaround at Tower



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Photo 3: Existing Access to PS-6



Photo 4: Overland Access to Tower 100

