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March 30, 2018

Ms. Billie Blanchard
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**RE: Ravenswood-Cooley Landing 115 kV Reconductoring Project (A. 17-12-010)
Response to California Public Utilities Commission Data Request No. 2**

Dear Ms. Blanchard:

This letter is in response to Data Request No.2 dated March 9, 2018 in which you identify additional items that require information from PG&E to continue your review of PG&E's application (A.12-01-012) for a Permit to Construct the Ravenswood-Cooley Landing 115 kilovolt (kV) Reconductoring Project (project). The original text for each Data Request item identified by the CPUC is included in Attachment 1, followed by PG&E's response.

This document includes the following attachments:

- Attachment 1. PG&E Responses to Data Request No. 2
- Attachment 2. Map of the Bay Division Pipeline Nos. 1 and 2 Historic District
- Attachment 3. 1948, 1960, and 1970 aerial photographs; 1938 map of Palo Alto
- Attachment 4. Revised Table 4. Records Search Results – Studies
- Attachment 5. Resource records for P-41-000086, P-41-002319 (submitted confidentially) and Declaration Supporting Confidential Designation
- Attachment 6. Resource record for P-41-002351

We trust the information provided herein is fully responsive to your requests. However, should you have any further questions, please do not hesitate to contact me at (415) 973-4893.

Sincerely,

Brandon Liddell
Senior Land Planner

Enclosure(s) hardcopy and DVD

cc:

Mike Monasmith, California Energy Commission
Mathew Swain, PG&E Law Department
Scott Oppelt, Stantec
Jamie Dean, PG&E Environmental Management

Attachment 1
PG&E Responses to Data Request No. 2

Attachment 1: PG&E Responses to Data Request No. 2

Ravenswood-Cooley Landing Data Request No. 2 includes the following issue areas:

- Cultural Resources
- Project Description

▪ Cultural Resources

CR-1 PEA Section 3.5.4.3 and the associated cultural resources study both state that an eligible historical resource, the Bay Crossing Reach, is immediately adjacent to, but outside, the project's area of potential effects (APE) (Waechter and Scher, 2017:22). Staff cannot assess the accuracy of this statement because the study does not map or otherwise substantiate the boundaries of the Bay Crossing Reach in relation to the APE. This California Register-listed and National Register-eligible resource, a linear historic district, comprises the Crossing Reach, Pipelines Nos. 1 and 2, and ancillary facilities such as the Ravenswood Valve House. The resource is also known as the Bay Division Pipelines Nos. 1 and 2 and by the Primary Numbers, P-01-010620 and P-01-001787¹.

The supporting documentation for the for the Bay Division Reliability Upgrade Project Final Environmental Impact Report and Section 106 cultural resources report defined the historic district boundary as the right-of-way (ROW) of the historic pipeline system, extending 21 miles in length and 60–100 feet in width (Ranzetta, 2007).

To better understand the potential for impacts to this historic district, please map the following on an aerial map base:

- a) The boundaries of the Bay Division Pipelines Nos. 1 and 2 Historic District such that the boundary of the Historic District/ROW in the vicinity of Staging Area 3 and Tower 4 is clear
- b) Please include the boundaries of the APE as defined in the study (Waechter and Scher, 2017)
- c) Please include the outlines of San Francisco Public Utilities Commission (SFPUC) parcels 093-600-010 and 093-590-060

PG&E Response: Please see Attachment 2 for a map showing the boundaries of the Bay Division Pipelines Nos. 1 and 2 Historic District, the boundaries of the project APE, which includes the Line, staging areas, work areas, landing zones, and the boundaries of San Francisco Public Utilities Commission (SFPUC) parcels 093-600-010 and 093-590-060. As noted in PEA Section 2.7.2, there are no ground-based work areas at Tower 4; all work at Tower 4 will be done by helicopter. Staging Area 3 lies adjacent to, but outside, the Historic District. Implementation of APM CUL-1 which requires installation of exclusion fencing between Staging Area 3 and the Historic District will further ensure the resource is avoided during construction.

CR-2 The EDR DataMap™ Corridor Study for the Cooley Landing-Ravenswood Transmission Line Project contains a basic records search for environmental history (EDR, 2017a). This type of report is used for projects such as redevelopment work, installation of fiber optic lines, road extensions, and other large scale projects. Reports of this type often include additional

¹ Primary Number is an identification number assigned by the California Historical Resources Information System (CHRIS).

information such as well data, public water supplies, historic aerials, historical topographic maps, and other records (EDR, 2017b). For the purpose of better understanding the historical uses of and changes to the environment in the project area, please obtain and provide the following records in decadal intervals, excluding those already provided in Waechter and Scher, 2017: Figures 4–7):

- a. Historical aerial photographs
- b. Historical topographic maps

PG&E Response: Historical aerials and topographic maps are not readily available for every decade; however, PG&E was able to locate three additional historical aerial photographs and one additional historical topographic map. These additional aerial photographs and topographic map are included as Attachment 3, and include the following:

- 1948 aerial photograph
- 1960 aerial photograph
- 1970 aerial photograph
- 1938 map of Palo Alto

CR-3 The confidential cultural resources report is missing bibliographic information/study references for the following studies depicted in Figure 8: S-43676, 47106, 7346, 39469, 38063, and 29573 (Waechter and Scher, 2017). Please provide bibliographic information for these studies.

PG&E Response: PG&E has revised Table 4 from the Cultural Resources Study to include missing bibliographic information/study references for the following studies: S-43676, S-07346, S-39469, S-38063, and S-29573. The reference for S-47106 was included in the original Table 4. The revised Table is included as Attachment 4.

CR-4 Appendix A of the confidential cultural resources report does not contain resource records for P-41-000086, P-41-002319, and P-41-002351 (see Waechter and Scher, 2017: Table 5, Figure 9). Please obtain and provide copies of these resource records.

PG&E Response: PG&E will transmit the two requested archeological records (P-41-000086, P-41-002319) to the CPUC confidentially in Attachment 5. Please also see the Declaration Supporting Confidential Designation in Attachment 5. Historical resource record P-41-002351 is included as Attachment 6.

CR-5 The confidential cultural resources report identifies the Cooley Landing/Palo Alto Boat Works as a cultural resource identified in the records search (Waechter and Scher, 2017: Figure 9). Figure 8 of the same report identifies two previous cultural resource studies at Cooley Landing/Palo Alto Boat Works' location (Cooley Landing NRHP, 2009; Cooley Landing Inventory, 2007). The latter study appears to refer to Baxter et al., (2007) but Cooley Landing NRHP 2009 is not described in Waechter and Scher (2007). Please identify whether "Cooley Landing NRHP 2009" refers to a National Register of Historic Places (NRHP) nomination form and provide any resource records associated with Cooley Landing, such as an NRHP nomination form or Department of Parks and Recreation 523 forms.

PG&E Response: "Cooley Landing NRHP 2009" refers to the National Register evaluation and DPR 523 site record prepared by S. Baxter and R. Allen. The resource was recommended ineligible, so no nomination form was prepared. The reference for the report bibliography and site record is as follows:

Baxter, R. Scott, and Rebecca Allen

2009 *Cooley Landing National Register of Historic Places Evaluation of the Palo Alto Boat Works*. PastForward, Inc., for Kleinfelder, Inc., San Jose, CA. Submitted to the City of East Palo Alto, CA.

Project Description

PD-1 Project Deficiency Responses No. 2(e) provided an explanation as to why the Bay Area Conservation and Development Commission (BCDC) was not included in the Proponents Environmental Assessment, Table 2.9-1. PG&E responded that it is coordinating with the BCDC to renew its permit, and that, "...the project will be covered under the future amended permit. PG&E will notify the BCDC as described in the attached permit procedures." Please provide a schedule, including milestones, for the notification process. Please describe the specific permit procedures for obtaining Amendment 11 to BCDC Permit No. M87-74(A). Staff wishes to comprehensively analyze both water quality and biological resources impacts in its forthcoming IS/MND, and would appreciate understanding to what degree (if any) our analyses need to incorporate BCDC requirements that may be necessary for issuing the amendment to expired BCDC Permit No. M87-74(A).

PG&E Response: As described in Permit No. M87-74(A) Amendment No. Ten under Section 2: Special Conditions, B. Annual Report, PG&E is required to submit an annual report by March 1st of each year to describe all projects completed the previous year under the permit and all projects proposed for the next calendar year. The BCDC will notify PG&E within 30 days of the date of the report if a certain project does not conform to the permit. Based on this condition, PG&E will notify BCDC of the Ravenswood- Cooley Landing Reconductoring Project by no later than March 1, 2020 in the Annual Report. If the project does not conform, the BCDC will notify PG&E by no later than April 1, 2020. PG&E will then apply immediately for a BCDC permit in anticipation of construction commencing in the fall of 2020. PG&E plans to informally meet with BCDC in 2018 to review the project and ensure the project conforms to the renewed permit. PG&E has been working with the BCDC to renew the existing BCDC Permit No. M87-74(A) as Amendment No. Eleven and has mailed a payment into the BCDC for final processing of the permit. BCDC will then send a final renewed permit to PG&E for signature and execution. To the best of our knowledge, the forthcoming renewed permit should read identical to the existing permit previously provided in our deficiency response except for changes to the permit expiration date and PG&E authorized permit signer. Upon receiving the new permit from BCDC, PG&E will provide a copy right away to the CPUC for their review. Requirements listed in the BCDC permit previously provided to the CPUC that are germane to water quality and biological resources impacts included Special Conditions: C.1, C.2, D, H, J, K, L, and M.