

Comment Set B
City of Shafter



336 Pacific Avenue Shafter, California 93263

September 10, 2009

Monisha Gangopadhyay
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

**RE: Proposed Mitigated Negative Declaration for Pacific Gas & Electric Company's
Seventh Standard Road Substation Project (Application No. A.09-03-004)**

Dear Monisha Gangopadhyay:

The environmental documents prepared for the Seventh Standard Road Substation Project (Application No. A.09-03-004) are not clear on how many tubular steel poles (TSP) are actually being proposed for the project or where they will be installed. The numbers range from three (3) to five (5). Varying heights are proposed on the same TSPs, e.g., 45 feet and 75 feet. Figure B-3 in the Initial Study shows three TSPs but the California Public Utilities Commission's Draft Mitigated Negative Declaration identifies five. To adequately analyze the project's potential significant impacts on the environment, a single consistent project description is required in all of the documents. The following outlines the subject TSP descriptions:

- (a) Pacific Gas and Electric Company's "Notice of an Application for a Permit to Construct" states: "The project will also include looping the existing Rio Bravo-Kern Oil 115kV circuit into and out of the substation, which will require the installation of three tubular steel poles (TSP) to support the new double-circuit 115 kV line between the substation and the existing Rio Bravo-Kern Oil 115 kV power line located on the south side, and within the franchise, of Seventh Standard Road."
- (b) The Proponents Environmental Assessment, under Section 1.4.1, states: "A single tubular steel pole (TSP) to be located midway between the substation and Seventh Standard Road, and two other TSPs (dead-end structures) to be located nearer to and east of the substation."

B-1

City Manager: (661) 746-5000 / Fax (661) 746-0607 Finance: (661) 746-5001 / Fax (661) 746-1002
Planning/Building/Engineering: (661) 746-5002 / Fax (661) 746-9125 www.shafter.com

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- (c) The California Public Utilities Commission's notice for the project states "Three tubular steel poles and two drop-down structures would be constructed from the Rio Bravo-Kern Oil 115 kV power line that parallels the south side of Seventh Standard Road for approximately 1,000 feet to the substation site."
- (d) The project description in the California Public Utilities Commission's Draft Mitigated Negative Declaration states "The subtransmission line would be located on three tubular steel poles (TSP) and two drop-down structures within the substation access road area."
- (e) The project overview description on page B.1-6 (Section B.1.9) in the Initial Study states: "The subtransmission line would be located on one tubular steel pole, approximately 90 feet tall, and two tubular steel pole dead end structures, approximately 75 feet tall, within the substation access road area."
- (f) The project components description on page B.1-10 (Section B.1.10.3) in the Initial Study states: "One TSP would be erected midway between Seventh Standard Road and the substation and two dead-end structures would be located just east of the substation from which the power line will drop down to the substation. The TSPs would be approximately 90 feet tall. The two drop down structures at the substation would be approximately 75 feet tall."
- (g) Figure B-3 of the Initial Study shows one 95 foot tall TSP and two 75 foot tall TSPs just east of the substation.
- (h) Figure B-5 of the Initial Study illustrates a singular TSP at 90 feet in height.
- (i) Figures B-6a and B-6b of the Initial Study illustrate two dead end TSP structures at 75 feet in height.
- (j) The project construction methods description on page B.1-18 (Section B.1.11.3) in the Initial Study states: "Drilling for TSP foundations (one single TSP and two dead-end structures) would be approximately 18 feet deep."

B-1 cont.

B-2

B-3

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- (k) The project visual description on page B.3-11 (Section B.3.1.2) in the Initial Study states: "The Proposed Project would include the low-profile electric substation, with a new 90-foot-tall tubular steel pole (TSP) located midway between the substation and Seventh Standard Road and two other TSP dead-end structures, approximately 45-foot-tall, to be located nearer to and east of the substation." On page B.3-12, the description states something different: "The proposed TSP closet to Seventh Standard Road would be 90 feet tall and the two TSPs closet to the substation would be 75 feet tall. The dead end structures would be approximately 45 feet tall. However, these vertical structures would be partially obscured by the new TSPs along the south side of Seventh Standard Road when seen from moving vehicles on Seventh Standard Road."
- (l) On page B.3-81, under Section B.3.15.2, the Initial Study states: "The addition of one 90-foot tall tubular steel pole (TSP) approximately 250 feet south of Seventh Standard Road and east of the paved access road would be the closet project feature to a public roadway. The TSP would connect to an existing 115 kV corridor and the new pole would be placed according to local requirements."

B-3 cont.

The adopted Mitigated Negative Declaration for the Seventh Standard Road Widening Project requires guardrails or crash cushions for all TSPs installed within the road right-of-way of Seventh Standard (see page 84). The adopted Mitigated Negative Declaration for the Seventh Standard Road Widening Project is referenced in Appendix 2 (page AP.2-2) of the Initial Study. If any TSP is proposed within the road right-of-way or planned road right-of-way of Seventh Standard Road (see Seventh Standard Road Specific Plan Line discussion below) without a guardrail or crash cushion, the project will cause significant traffic hazards. As well, the Finding of Less than Significance for traffic hazards under Section B.3.15.2(d), pages B.3-81 and B.3-82, of the Initial Study will not be valid.

B-4

Section B.3.1 in the Initial Study, pages B.3-1 to B.3-14, does not identify the adopted Seventh Standard Road Specific Plan Line. Both the City of Shafter and the County of Kern have adopted this Specific Plan Line which establishes a 126 foot wide planned right-of-way for Seventh Standard Road from Coffee Road to just west of Santa Fe Way. The Initial Study needs to include this document in its analysis of the project's potential significant impacts on the environment. In particular, the proposed installation locations of the TSPs in relation to the adopted Specific Plan Line need to be addressed. A copy of the adopted Seventh Standard Road Specific Plan Line has been e-mailed to you at seventhstandard@aspenerg.com.

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We would greatly appreciate it if all the above environmental documents are revised to provide a single consistent project description for the proposed TSPs. We will need additional time to review and comment on the revisions to adequately analyze the project's potential significant impacts on the environment.

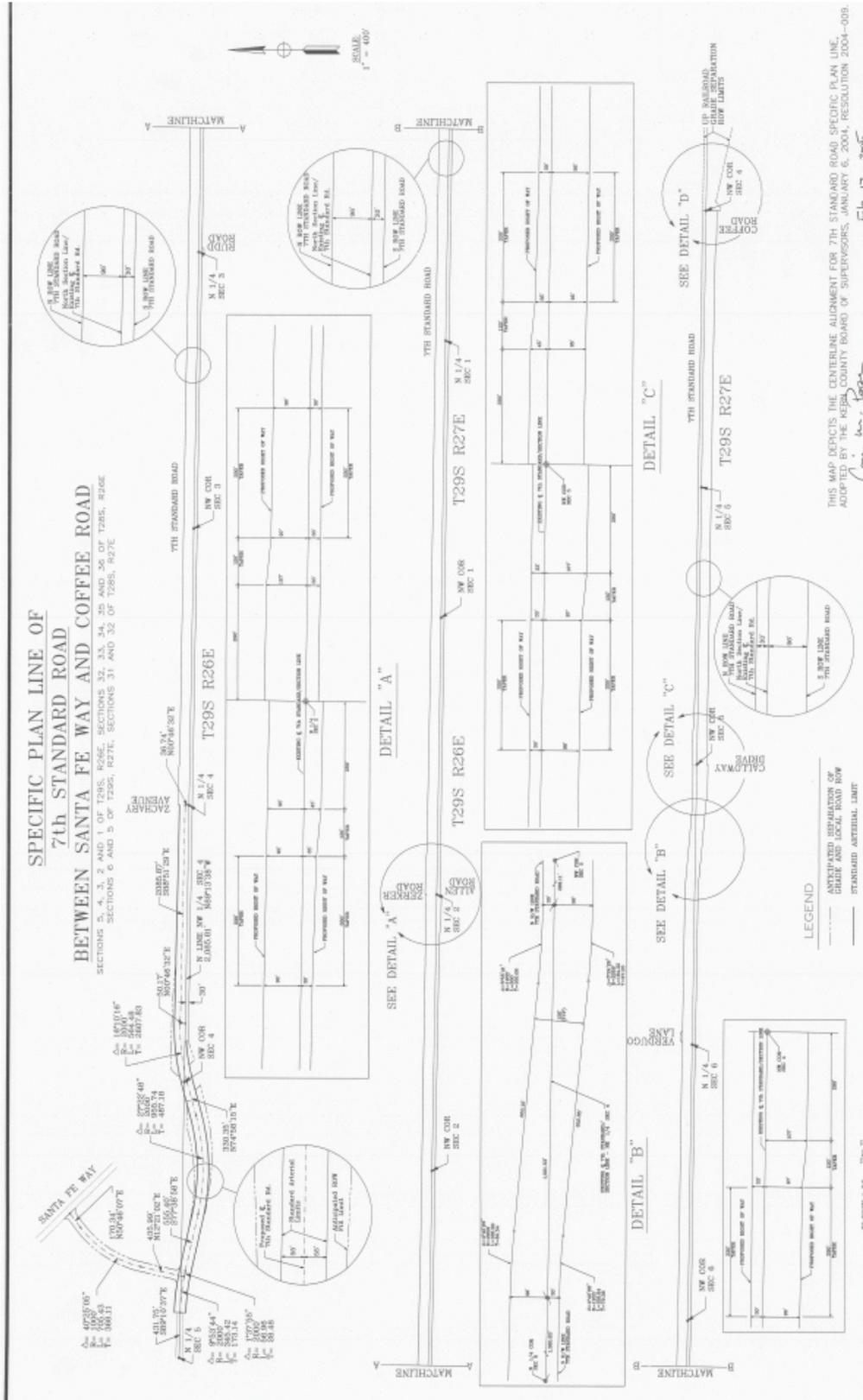
Sincerely,



Wayne Clausen
Planning Director

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B-6

Responses to Comment Set B City of Shafter

B-1 The commenter notes that varying heights were used to describe the tubular steel poles (TSP) required for the project, and that the number and location(s) of TSP that would be built should the project be approved was unclear.

The commenter notes that the Pacific Gas and Electric Company's Notice of An Application for a Permit to Construct and Proponents Environmental Assessment both stated that a total of three TSPs would be built. The PEA also stated that a singular TSP would be located midway between the substation and Seventh Standard Road and two other TSPs (dead-end structures) would be located nearer to and east of the substation.

The commenter notes that the CPUC's notice and project description consistently refer to three TSPs and two drop-down structures as the components of the transmission line. In the Proponent's Environmental Assessment and the Draft IS/MND, the terms "dead-end" and "drop-down" structures were used interchangeably. In order to clarify the project description and assign these terms to two sets of structures to make clear the difference between the set of 75-foot-tall "drop-down" structures and the 36-foot-tall "dead-end" structures, the text of the MND has been revised.

Project Description (Section A) has been revised in response to the comment as follows:

- Installation of approximately 1,000 feet of overhead double-circuit 115 kV subtransmission line starting at the Rio Bravo-Kern Oil 115 kV power line located along Seventh Standard Road and ending at the substation. The subtransmission line would be located on ~~three~~ one tubular steel poles (TSP) and two TSP dead-end~~drop-down~~ structures within the substation access road area.

Project Overview Description (Section B.1.9) has been revised in response to the comment as follows:

The Proposed Project would include the following components, which are depicted in Figures B-3 and B-4: [...]

- Installation of approximately 1,000 feet of overhead double-circuit 115 kV subtransmission line starting at the Rio Bravo-Kern Oil 115 kV power line located along Seventh Standard Road and ending at the substation. The subtransmission line would be located on one tubular steel pole, approximately 90 feet tall, and two tubular steel pole ~~drop-down~~~~dead-end~~ structures, approximately 75 feet tall, within the substation access road area.
- Two dead-end structures approximately 36 feet tall on the east side of the substation.

Section B.1.10.3 115 kV Subtransmission Lines has been revised in response to the comment as follows:

One TSP would be erected midway between Seventh Standard Road and the substation and two ~~drop-down~~~~dead-end~~ TSP structures would be located just east of the substation from which the power line will drop down to the substation. The single TSPs would be approximately 90 feet tall. The two drop-down structures at the substation would be

approximately 75 feet tall. The proposed conductor would be a “Marigold” 1113 kcmil All-Aluminum (AA) strand conductor, 1.216 inches in diameter. No shield wire would be used. Figures B-5 and B-6a and B-6b show profile drawings of a single TSP and the two TSP ~~dead-end~~drop-down structures. Figure B-7 displays a photograph of a TSP and a ~~dead-end~~drop-down structure that are from a different location but are similar to those that would be erected at the Seventh Standard Substation. Figure B-7 also displays two dead-end structures.

- B-2 Figure B-3 of the Initial Study has been revised to show one 90-foot-tall TSP and two 75-foot-tall drop-down TSPs.

The project includes one 90-foot TSP and two 75-foot drop-down TSPs; as such, Figure B-5 has not been revised. Figures B-6a and B-6b have been revised to say “Tubular Steel Pole, Drop Down Structure.”

- B-3 Section B.1.11.3 of the MND has been revised in response to the comment as follows:

Completing the 115 kV subtransmission interconnection would occur in two phases: installation of the new TSPs and conductor stringing. Drilling for TSP foundations (one single TSP and two drop-down~~dead-end~~ structures) would be approximately 18 feet deep.

Section B.3.1.2 of the MND has been revised in response to the comment as follows:

The Proposed Project would include the low-profile electric substation, with a new 90-foot-tall tubular steel pole (TSP) located midway between the substation and Seventh Standard Road and two other TSP drop-down~~dead-end~~ structures, approximately ~~7545~~ 75 feet tall, to be located nearer to and east of the substation.

Section B.3.1.2 of the MND has been revised in response to the comment as follows:

The proposed TSP closest to Seventh Standard Road would be 90 feet tall and the two TSPs closest to the substation would be 75 feet tall. The ~~dead-end~~ structures would be approximately ~~4536~~ 75 feet tall. However, these vertical structures would be partially obscured by the new TSPs along the south side of Seventh Standard Road when seen from moving vehicles on Seventh Standard Road.

Section B.3.15.2 of the MND described the location of the project feature that would be closest to a public roadway. The distance, approximately 250 feet south of Seventh Standard Road, is correct. No text changes are necessary in response to this comment.

- B-4 The commenter states that, in accordance with the adopted Mitigated Negative Declaration for the Seventh Standard Road Widening Project, guardrails or crash cushions should be required for any TSP within the road right-of-way or planned right-of-way of Seventh Standard Road to avoid a potential significant impact. The commenter included the “Specific Plan Line of 7th Standard Road Between Santa Fe Way and Coffee Road” adopted by the City of Shafter and County of Kern (2004) that established a 126-foot-wide planned right-of-way for Seventh Standard Road from Coffee Road to just west of Santa Fe Way.

As stated in Section B.3.15.2, one 90-foot tall TSP approximately 250 feet south of Seventh Standard Road would be the closest project feature to a public roadway. As such, no TSP

would be located within a road right-of-way or planned right-of-way and no text changes are necessary in response to this comment.

Section B.3.17 (Mandatory Findings of Significance) has been revised in response to the comment as follows:

Road Widening. Seventh Standard Road has been proposed as an interconnection between SR-99 and SR-43. Seventh Standard Road is currently being widened from a two-lane road to a four-lane divided road (ultimately a six-lane divided highway) to improve congestion and safety and serve as a north beltway for the metropolitan area surrounding Bakersfield. Construction will occur along Seventh Standard Road adjacent to the Proposed Project site from Coffee Road to immediately west of the existing residential area adjacent to the Burlington Northern & Santa Fe Railroad and Santa Fe Way (City of Shafter et al., 2006). The Specific Plan Line of 7th Standard Road establishes a 126-foot-wide planned right-of-way; it was adopted by the City of Shafter and Kern County in 2004.

Additionally, the Specific Plan Line has been included in the references section (Appendix 2) for the Seventh Standard Substation Project IS/MND as follows:

City of Shafter. 2004. Specific Plan Line of 7th Standard Road Between Santa Fe Way and Coffee Road. Adopted by the Kern County Board of Supervisors, January 6, 2004, Resolution 2004-009.

B-5 The project description has been revised to clarify any inconsistencies regarding the height of the TSPs and the dead-end structures (see Responses to Comments B-1 through B-3). However, the impact conclusions of the MND would not change based on any of the changes.

The CPUC acknowledges the City of Shafter's concerns regarding the distance from the nearest TSP to the Seventh Standard Road; however, the impact regarding an increase in hazards because of a design feature or incompatible uses remains *Less than Significant*. The nearest project TSP would be approximately 250 feet from Seventh Standard Road. As such, it is well outside the 126-foot-wide planned right-of-way for Seventh Standard Road, and no text changes are required.

Monisha Gangopadhyay (Project Manager, CPUC Energy Division) sent a clarifying email to Wayne Clausen (Planning Director, City of Shafter) on September 23, 2009 regarding the varying tower heights and types, as well as other comments raised about the road widening project and the Seventh Standard Road Specific Plan Line. On September 25, 2009, Mr. Clausen responded stating that the project description clarified that no TSP will be installed within or adjacent to Seventh Standard Road. Therefore, the City of Shafter did not have any additional questions or issues for the Seventh Standard Substation project.

B-6 The "Specific Plan Line of 7th Standard Road Between Santa Fe Way and Coffee Road" is noted. Please see Response to Comment B-4.