Comment Set C
Pacific Gas & Electric Company

Pacific Gas and Electric Company®

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September 3, 2009

Ms. 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 and Supporting Initial Study for the Proposed Seventh Standard Substation Project (A.09-03-004)

Dear Ms. Gangopadhyay:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to submit comments on the Proposed Mitigated Negative Declaration and supporting Initial Study (IS/MND) for the proposed Seventh Standard Substation Project (Project). C-1

PG&E recommends the following clarifications and errata to the IS/MND:

Under **B.1.10.1 Seventh Standard Substation**, the 2nd sentence in the 3rd paragraph needs clarification. We suggest the following: "The substation would be served by one looped 115kV power line, and have three…." C-2

Under **B.1.12.1 Substation Operations, Maintenance, and Inspection**, the first sentence in the first paragraph, please change "Midway Substation" to "Kern Distribution Operations Center in Bakersfield." C-3

Under **B.1.14.2 EMF and the Seventh Standard Substation Project,** the first bullet point, change to "Compacting the equipment spacing within the substation." C-4

Under **B.3.1.1 Setting, on page B.3-3, Regional Context,** 4th paragraph, 7th sentence beginning with "North," change "North" to "East." In the same paragraph, there is a reference to Golden State Freeway as being "I-5." It should state "Business 99" or "Old 99," or something like this. Under this same section, 6th paragraph, 4th sentence beginning with "To the south…. " there is a reference to the Rio Bravo-Kern Oil line. This line is not to the south, it is to the north. There are electric distribution facilities associated with the oil field operations to the south.

Under **B.3.1.2 Environmental Impacts and Mitigation Measures, on page B.3-11, Project Visual Description**, 1st paragraph, 1st sentence, change "45-foot tall" to "75-foot tall," as this refers to the TSP dead-end structures shown in Figures B-6a and B-6b. C-5

Under **B.3.8.2 Environmental Impacts and Mitigation Measures (e), on page B.3-54**, there is a reference that the project would create approximately 4.9 acres of "impervious surfaces." The paved roads and equipment foundations may be considered C-6

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impervious, but the remaining area should not be considered impervious. The proposed project calls for well-packed aggregate base rock for the top six (6) inches. This will result in about a 75% run-off rate for the compacted material. Run-off within the proposed substation will be directed to a storm water basin, which is designed to allow the run-off to percolate into the ground. No run-off generated by the design storm should leave the proposed substation.

C-6 cont.

Under **B.3.9.1 Setting,** 2nd paragraph, 2nd sentence, please remove this sentence, which begins with "An electrical substation will be an allowed use….. " as PG&E is not subject to local conditional use permit jurisdiction.

C-7

On page **B.3-12** there is a reference to "TSP riser." We are not sure what this is referring to. Is it referring to the "drop-down structures" mentioned in the same paragraph, the "H" type structures to where the conductors extend from the 75-foot tall TSP dead end structures? We prefer the use of "drop down structures" if this is the case.

C-8

Thank you again for the opportunity to submit these comments. If you have any questions regarding this information you may contact me at (559) 263-5237 or my email address AJS4@pge.com.

Sincerely,

Andrew Smith
Senior Land Planner

Responses to Comment Set C
Pacific Gas and Electric Company

C-1 The text in Section B.1.10.1 Seventh Standard Substation of the MND, second sentence in the third paragraph, has been revised to reflect the comment as follows:

> The substation would be an unstaffed, automated 45 MVA, 115/21 kV low-profile substation. The substation would be served by one 115 kV subtransmission source line with three 45 MVA 115/21 kV transformers and up to nine 21 kV distribution lines at ultimate buildout (see Figure B-3, Proposed Substation Site Diagram).

C-2 The text in Section B.1.12.1 Substation Operations, Maintenance, and Inspection of the MND, first sentence in the first paragraph, has been revised to reflect the comment as follows:

> Operation of distribution equipment at the Seventh Standard Substation would be controlled remotely from the ~~Midway Substation~~ Kern Distribution Operations Center in Bakersfield.

C-3 The text in Section B.1.14.2-EMF and the Seventh Standard Substation Project of the MND, first bullet point, has been revised to reflect the comment as follows:

> Compacting the equipment spacing within the substation ~~using the 230 kV Bantam Substation design~~;

C-4 The text in Section B.3.1.1 Setting, Regional Context, has been revised to reflect the comment as follows:

> The Rio Bravo–Kern Oil 115-kV subtransmission runs 700 feet north of the project site along the southern side of Seventh Standard Road. East~~North~~ of the proposed substation, the *SR-99 at Seventh Standard Road Interchange Project* will widen Seventh Standard Road to a four-lane divided street with two lanes in either direction (ultimately it would be six lanes with three lanes in each direction) in the area nearby SR-99. The interchange project also includes a new bridge across SR-99, a signalized intersection at the Golden State Avenue~~Freeway (I-5)~~ and Seventh Standard Road interchange, and other upgrades in the nearby vicinity. The roadway improvement project began in May 2008 with an expected completion date in the spring of 2010. In addition, north of the proposed substation and west of the *SR-99 at Seventh Standard Road Interchange Project*, the *Seventh Standard Road Widening Project* will widen Seventh Standard Road from the existing two-lane road to a four-lane expressway from Coffee Road to Zachary Avenue. The widening project broke ground in the summer of 2009.
>
> There are no notable visual features in this viewshed. There are no views to the Kern River or to downtown Bakersfield from the project site due to the flat topography and intervening almond trees or structures. The viewshed is currently limited on all sides by an existing almond orchard. To the south of the proposed site, active oil fields and ~~the Rio Bravo – Kern Oil 115~~ kV a distribution line can be seen in the landscape.

C-5 The text in Section B.3.1.2 Environmental Impacts and Mitigation Measures Project Visual Description has been revised to reflect 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 dead-end structures, approximately 7545 feet tall, to be located nearer to and east of the substation.

C-6 The commenter has provided additional information regarding the impervious surfaces at the substation and the storm water basin. The text in Section B.3.8.2 Environmental Impacts and Mitigation Measures (e) has been revised to reflect the comment as follows:

LESS THAN SIGNIFICANT. As described above, stormwater runoff from Seventh Standard Road is discharged to earthen culverts primarily designed for temporary storage during rainfall events. These earthen culverts allow evaporation and percolation of surface flows (City of Shafter et al., 2006). There are no other existing stormwater drainage systems in the vicinity of the Proposed Project. Implementation of BMPs per the SWPPP would eliminate or minimize runoff during construction. The Proposed Project would result in the creation of ~~approximately 4.9 acres of~~ impervious surfaces across the paved access road and the equipment foundations. The remainder of the project site would be well-packed aggregate base rock which would result in a 75 percent run-off rate for the compacted material. The impervious and semi-impervious surfaces ~~which~~ would result in runoff at the site. ~~However, t~~The local increase in runoff would be minor due to the small size of the project relative to the watershed. Any runoff, including polluted runoff, from the project site would be collected in the onsite retention storm water basin during normal storm events. While the storm water basin has been designed to allow runoff to percolate into the ground, ~~D~~during 50- or 100-year storm events, the impervious surfaces at the site may contribute to a minimal~~small~~ amount of runoff. Although this impact would be adverse, it would not result in substantial amounts of runoff and would be less than significant.

C-7 The text in Section B.3.9.1 Setting, second sentence of the second paragraph, has been revised to reflect the comment as follows

The Seventh Standard Substation site would be located in an area designated by the Bakersfield General Plan Update as part of the "2035 Build-Out Area," in an area zoned as Limited Multi-Family dwelling Zone (R-2). The CPUC has exclusive permitting authority regarding PG&E's application to build the Seventh Standard Substation, and no local use permit would be required. Absent CPUC involvement, this type of project would otherwise be considered a conditional use under the site's land use designation and zoning.~~An electrical substation will be an allowed use under a conditional use permit from the City of Bakersfield.~~

C-8 The text in Section B.3.1.2 Environmental Impacts and Mitigation Measures Project Visual Description, fourth paragraph, has been revised to reflect the comment as follows

Figure B-12 presents the existing view from KOP 1 (before) and the PG&E simulation of the low-profile substation, ~~and~~ the new 90-foot TSP, ~~riser and~~ the drop-down TSP structures, and the dead-end poles (after). The view from KOP 1 would be changed by the new TSP, dead-end poles, and drop-down structures. The re-routed distribution line is also visible in the simulation. The subtransmission line component of the Proposed Project would appear in line with existing wood poles that are approximately 45 feet tall. The TSP ~~riser~~ would include hardware and conductors looping into the pole at appropriate spacing and heights to comply with CPUC requirements, and as such, it would be notably taller and more complex than the existing wood poles.