

7. Responses to Comments

This section presents responses to the comments received during the public review period for the Mitigated Negative Declaration (July 15, 2013 through August 14, 2013). A newspaper notice, including information on the Draft IS/MND, the project website address, and the dates of the comment period, was published in the Santa Rosa Press Democrat on July 15, 2013 (see Appendix D for a copy of the notice).

The CPUC received three public comments. State and local agencies, the public, and the Applicant were notified of the intent to adopt the Mitigated Negative Declaration.

Table 7-1 lists the persons and agencies that submitted comments on the Proposed MND. The individual comments are numbered, and responses immediately follow the comment letter. If revisions were made to the MND and supporting Initial Study based on the comments, the revisions are provided with the response to the specific comment and are indicated in the text of this Final MND with ~~strikeout~~ for deletions of text, and in underline for new text.

Table 7-1. Comments Received on the Draft Mitigated Negative Declaration

Commenter	Date Received	Comment Set Number
Linda Kelly, Town Manager – Town of Windsor	8/13/13	A1
David Randolph	8/7/13	E1
Christina Holstine, Senior Land Planner – Pacific Gas & Electric Company	8/14/13	F1

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Comment Set A1 Town of Windsor



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Linda Kelly

August 13, 2013

Mr. Eric Chiang
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

VIA FACSIMILE AND EMAIL

Dear Mr. Chiang,

The Town of Windsor appreciates the opportunity to review the Mitigated Negative Declaration for the PG&E Windsor Substation Project (Application No. A.10-04-024). The Town continues to support the construction of the local substation at the proposed location (Nase property). Please accept the following comments and recommendations related to the Mitigated Negative Declaration that we feel will mitigate significant environmental impacts and create a project that meets the expectation of the citizens of Windsor.

5.10 Land Use and Planning

A key question in the Initial Study attempts to gauge if the project is consistent with existing land use plans that have been implemented to protect the environment, specifically:

“Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?”

The Town has adopted many policies applicable to development projects in an effort to protect public health, safety, and welfare, which in many cases, includes the environment. A private development project similar to the substation would be subject to the following Town plans and policies:

- Complete Street Design Guidelines (2013),
- Design and Construction Standards (2011),
- Calthorpe/Solomon Town of Windsor Design Standards (1997),
- Frontage Improvements Ordinance (2003),
- Storm Water Quality Ordinance (2008),
- Windsor Bicycle and Pedestrian Master Plan (2008), and
- The North Old Redwood Highway Area Utility Infrastructure Study (2012)

A1-1

Comment Set A1, cont. Town of Windsor

In order to be consistent with these plans and policies, the Town recommends the approved project should be required to include the following design elements:

A1-1 cont.

1. *In accordance with Complete Street Design Guidelines, Frontage Improvements Ordinance, Design and Construction Standards and the Windsor Bicycle and Pedestrian Master Plan.*

A1-2

- a. The entire project frontage on Old Redwood Highway should include installation of a 14-foot wide maximum sidewalk with Town standard tree wells, a 6-foot class II bike lane, travel lane/roadway transition area, curb and gutter and dedication of sufficient right-of-way to accommodate the roadway improvements with an additional 5-foot Public Utility Easement behind the proposed right-of-way.

2. *In accordance with the Frontage Improvements Ordinance and the Design and Construction Standards.*

A1-3

- a. Installation of street lighting meeting Town standards along the project frontage.

3. *In accordance with the Storm Water Quality Ordinance.*

A1-4

- a. Adherence to Town of Windsor's storm water quality requirements.

4. *In accordance with the Frontage Improvements Ordinance.*

A1-5

- a. Undergrounding of new overhead electric utility lines (of 26,000 volts or less) to accommodate the new facility. This should include the 1.8 miles of lines that are proposed to be upgraded on Old Redwood Highway from the substation site to Downtown Windsor. If this is not technically feasible, PG&E should underground transmission lines from Starr Road and Old Redwood Highway to Downtown Windsor.

5. *In accordance with the Calthorpe/Solomon Town of Windsor Design Standards and the North Old Redwood Highway Area Utility Infrastructure Study.*

A1-6

- a. Provide a 25-foot wide easement along the westerly property boundary and the North West Pacific Rail Road right-of-way to accommodate a 22-foot wide trail corridor, and storm drainage/sanitary sewer improvements. A 20-foot access easement located on the project site from Old Redwood Highway to access the 25-foot easement.

Comment Set A1, cont.
Town of Windsor

- 6. *In accordance with the North Old Redwood Highway Area Utility Infrastructure Study.*
 - a. A public storm drain system should be installed in Old Redwood Highway discharging to Sotoyome Creek to accommodate the concentrated flow from the installation of curb and gutter as referenced in Item 1a above. To the extent possible, the site drainage should be routed to the public storm drain system in Old Redwood Highway.

- 7. *In accordance with the North Old Redwood Highway Area Utility Infrastructure Study.*
 - a. Dedication of a 50-foot by 50-foot right-of-way for a future sanitary sewer pump station with a 20 foot wide access easement to the future pump station.

A1-7

A1-8

The Town appreciates this opportunity for inclusion in the project planning process and we look forward to working cooperatively with PG&E to include these recommendations into the final project. We request that we be informed in advance of any public hearings held by the CPUC regarding this project. Please contact Jim Bergman, Community Development Director at (707) 838-5335 for any information concerning the Town's position.

Sincerely,

Linda Kelly, Town Manager

I:\60 - Community Development Dept\Planning Department\2006-10\09\09-41 PG&E Substation\Correspondence\PG&E MND Comment Letter 08-14-13.docx

Responses to Comment Set A1 Town of Windsor

A1-1 In this comment, the Town Manager for the Town of Windsor states that it is important that the Initial Study (IS)/Mitigated Negative Declaration (MND) address project consistency with existing land use plans. The commenter notes that the Town of Windsor has adopted many policies to protect public health, safety, and welfare, and that private development would be subject to plans and policies listed in Comment A1-1. The commenter recommends numerous changes to the project to conform with these local plans and policies.

The CPUC appreciates the Town's comments on the Draft IS/MND. The currently proposed site for the Windsor Substation was identified as the preferred site by the Town of Windsor on August 25, 2011 after two public hearings. The commenter correctly notes that Section X(b) of the CEQA checklist asks:

"Would the project conflict with any applicable land use policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal project, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?"

As the Draft IS/MND describes, the CPUC has exclusive permitting authority over the substation project (see, for example, Section 5.10.1 [Land Use and Permitting, Setting] on Page 5-104). That is, the CPUC has preemptive jurisdiction over the construction, operation, and maintenance of public utility facilities within the State and, as such, discretionary approvals (e.g., use permits) from local agencies are not required.

While the proposed project is exempt from local land-use and zoning regulations and permitting, CPUC General Order 131-D Section 1X.B states that:

"Local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters."

CPUC understands that PG&E has consulted with the Town of Windsor and has redesigned elements of the proposed project to incorporate some requested improvements and to allow the Town to purchase easements in areas of the substation site for installation of future improvements. In addition, PG&E has agreed to install a wall around the substation and landscaping along Old Redwood Highway and Herb Lane (as discussed in Section 5.1, Aesthetics). PG&E responded to the Town's requests for the improvements described in the Town's comments in letters from Joe Horak to Patrick Givone (Assistant Engineer, Town of Windsor) delivered the week of May 20, 2013 and from Jo Lynn Lambert to Stuart Hayre (Principal Civil Engineer, Town of Windsor) dated May 23, 2013.

Because the proposed substation would be a remotely controlled facility supporting the electrical system in the Town and surrounding areas, it would not trigger the need for additional Town infrastructure. In addition, the Draft IS/MND properly identifies the Town's General Plan goals that relate to locating the substation, and concludes that the project is consistent with them (see Draft MND, Section 5 pages 5-104 to 5-105).

- A1-2 This Town of Windsor comment states that in accordance with listed Town policies (Complete Street Design Guidelines, Frontage Improvements Ordinance, Design and Construction Standards and the Windsor Bicycle and Pedestrian Master Plan), the entire project frontage on Old Redwood Highway should include the installation of a 14-foot-wide (maximum) sidewalk with Town standard tree wells, a 6-foot class II bike lane, travel lane/roadway transition area, curb and gutter and dedication of sufficient right-of-way to accommodate the roadway improvements with an additional 5-foot Public Utility Easement behind the proposed right-of-way.
- These requested improvements are not present north or south of the proposed substation site. However, PG&E has designed the substation site to allow sufficient space for the Town to implement sidewalk and bike lane improvements in the future. In its May 2013 letters to the Town of Windsor, PG&E agreed to install curb and gutter and dedicate a 5-foot-wide public utility easement. The cost of the curb and gutter would be placed in trust so that it can be installed when the Town implements its planned improvements along Old Redwood Highway in the future. The CPUC believes the other requested improvements are not sufficiently related to the impacts of the substation to warrant requiring PG&E to implement them.
- A1-3 This comment states that the proposed project should incorporate installation of street lighting meeting Town of Windsor standards along the project frontage in accordance with the Town's Frontage Improvements Ordinance and the Design and Construction Standards. Planned lighting for the proposed project is described in Section 4.9.4 of the Project Description on Page 4-6 of the Draft IS/MND. The CPUC does not believe that the proposed project warrants requiring PG&E to implement the requested improvements. See Response to Comment A1-1 and A1-2.
- A1-4 This Town comment states that the proposed project should adhere to the Town's storm water quality requirements in accordance with the Town's Storm Water Quality Ordinance. Because of the CPUC's exclusive jurisdiction, the proposed project is not subject to the Town's Standard Urban Storm Water Mitigation Plan (SUSMP) or its Storm Water Ordinance. See Response to Comment A1-1. However, in its May 2013 letters to the Town, PG&E committed to working with the Town of Windsor on storm water and drainage issues to ensure that potential project impacts are addressed. As noted in Section 5.9 (Hydrology and Water Quality) in the Draft IS/MND, the project will comply with all state and federal water quality regulations.
- A1-5 This comment indicates that in accordance with the Town of Windsor's Frontage Improvements Ordinance the proposed project should include undergrounding of overhead utility lines. The comment states that this should include the 1.8 miles of lines along Old Redwood Highway that would be upgraded under the proposed project. The comment requests that if this is not technically feasible, that the Applicant should underground transmission lines from Starr Road and Old Redwood Highway to Downtown Windsor.
- As described in Sections 4.9.7 (Distribution Lines) and 4.12.3 (Underground Installation) in the Project Description, the proposed project would involve underground work in areas where distribution lines are currently underground; the proposed project does not involve undergrounding utilities that are currently overhead. Based on the existing setting along Old Redwood Highway and the additional cost required for undergrounding,

the CPUC does not believe that requiring additional undergrounding is warranted for the proposed project.

- A1-6 This comment from the Town states that in accordance with Town policies (Calthorpe/Solomon Town of Windsor Design Standards and the North Old Redwood Highway Area Utility Infrastructure Study), the Applicant should provide a 25-foot-wide easement along the western property boundary and the North West Pacific Rail Road right-of-way to accommodate a 22-foot-wide trail corridor, and storm drainage/sanitary sewer improvements. The comment also requests a 20-foot access easement on the project site from Old Redwood Highway to access the 25-foot easement.

In its May 2013 letters to the Town, PG&E committed to providing adequate space for the requested 25-foot easement, subject to compensation for the easement. PG&E indicated that the 20-foot access easement would not be possible, that the Town could access the area from Herb Lane if necessary. The CPUC does not believe additional accommodation of drainage and sewer improvements is necessary as part of the proposed project.

- A1-7 The Town comment states that in accordance with the North Old Redwood Highway Area Utility Infrastructure Study, the Applicant should install a public storm drain in Old Redwood Highway discharging to Sotoyome Creek to accommodate the concentrated flow from the installation of curb and gutter referred to in Response to Comment A1-2. The comment requests that to the extent possible, the site drainage should be routed to the public storm drain system in Old Redwood Highway.

Substation site drainage is described in Section 5.9.1 (Hydrology and Water Quality, Setting) in the Draft IS/MND. As noted in its May 2013 letter to the Town, PG&E has committed to complying with CPUC-regulated design standards and will work with the Town to address any potential storm water and drainage issues consistent with CPUC design standards. PG&E plans to provide funds (in trust) for future curb and gutter installation as described in Response to Comment A1-2. The CPUC does not believe additional stormwater improvements are necessary as part of the proposed project.

- A1-8 This comment from the Town of Windsor suggests that the proposed project should include dedication of a 50-foot by 50-foot right-of-way for a future sanitary sewer pump station with a 20-foot-wide access easement to the future pump station. As noted in PG&E's May 2013 letter to the Town, PG&E will (at least in the near-term) allow space for an easement for a future pump station. The Town's acquisition of such an easement would be subject to payment for the easement. Because the proposed project is an unmanned substation that would not generate sanitary waste, the CPUC does not believe that additional accommodations for a future sewer pump station are necessary as part of the proposed project.

Comment Set E1 David Randolph

From: davidra@sonic.net
To: [Windsor Substation Project Team](#)
Cc: matthew@sonomawest.com
Subject: Open Letter to Eric Chiang CPUC Apsen Environmental Group
Date: Wednesday, August 07, 2013 12:44:28 PM

Dear Mr. Chiang,
where you propose to build the new substation is in an area that is residential as well as commercial. If you're planning to connect up to the Fulton substation, why don't you build it closer to Fulton rather than on the other side of town, where indubitably it will be much more expensive to connect? Further, with all due respect, isn't it about time we turn the corner and get real? If you are not aware, Windsor is a Solar City and we are proud of this. It is time, in fact, way past time that we stop investing and perpetrating these outmoded and outdated energy technologies that are no longer sustainable nor frankly desired by the good folk of Windsor. Instead of building this new substation, while I realize this may serve well as yet another pork barrel boondoggle for a handful of the ultra wealthy, why you don't you do the right thing and give us locals solar panels? That way not only could we sell the needed energy back to you, but moreover eliminate the need for you to build yet another anachronistic and fat cat fattening dinosaur? Sincerely, on behalf of the children and future generations of Windsorites,
David Randolph

cc: The Windsor Times

E1-1

Responses to Comment Set E1

David Randolph

- E1-1 The commenter asks why the proposed project is not located closer to the Fulton Substation. The commenter also states that instead of building the proposed substation, the applicant should give Windsor residents solar panels so that they can sell electricity.
- See Response to Comment A1-1 regarding the selection of the proposed project site. Regarding alternatives to the proposed project, CEQA does not require consideration of alternatives when a proposed project would not result in significant impacts after mitigation. Nevertheless, CPUC's GO 131-D requires that an application for a Permit to Construct include the "reasons for adoption of the power line route or substation location selected, including comparison with alternative routes or locations, including the advantages and disadvantages of each" (GO 131-D, section IX.B.1.c.). Numerous locations were evaluated as potential sites for the proposed project as described in Section 4.17 (Project Description, Substation Site Alternatives). The need for the proposed project is described in Section 4.7 (Project Description, Purpose and Need).

Comment Set F1 Pacific Gas & Electric Company



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August 14, 2013

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

**RE: PG&E Windsor Substation Project
Draft Initial Study/Mitigated Negative Declaration**

Dear Mr. Chiang:

Pacific Gas and Electric Company (PG&E) appreciates the considerable effort expended by Commission staff and their consultants to prepare the environmental review for the proposed Windsor Substation Project (project), and welcomes the opportunity to submit the following minor comments and suggestions on the Draft Initial Study and Mitigated Negative Declaration (MND).

PG&E suggests the following minor revisions and corrections to the MND:

1. **Page 4-1, Section 4, Project Description.** The fourth paragraph, first bullet point states: "Pole replacement and line work would occur along Old Redwood Highway, Starr Road, and Gumview Road." This list should also include "Wilcox Road, Starr Circle, Railroad Avenue, and Joni Court."
2. **Page 4-8, Section 4.8.7.** In the first paragraph, please delete "at the Fulton No. 1 60 kV Power Line" since some of the circuits are not being capped there. All other information in this paragraph is correct.
3. **Figure 4-4** is dated PGE 2012. This should be dated PGE 2013.
4. **Page 4-10, Section 4.10.1, last paragraph.** For clarification, water used during construction may be supplied by sources other than the Town of Windsor, including potentially the nearby well adjacent to Herb Road or construction baker tanks.
5. **Page 4-12, Section 4.10.3 Construction Workforce and Schedule.** Please revise the sentence in the last paragraph regarding substation construction to state: "Substation

F1-1

F1-2

F1-3

F1-4

F1-5

Comment Set F1, cont. Pacific Gas & Electric Company

Mr. Chiang
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- work (civil construction) would occur over eight months.” There may be other activities taking place on site, including distribution work, which will extend beyond the eight-month window until the completion of the project. F1-5 cont.
6. **Page 4-13, Section 4.11.1.** The last paragraph states: “The completed hole would be temporarily covered by the end piece of a conductor spool until installation of the new foundation.” Please delete: “by the end piece of a conductor spool,” so the sentence reads: “The completed hole would be temporarily covered until installation of the new foundation.” F1-6
7. **Page 4-14 through 4-17, Section 4.12 Reconductoring of Distribution Line and Power Line Underbuild.** The exact location of disposal sites used during construction for pulled wooden poles, excavated soil, soil transportation and removal could change depending upon the availability of disposal locations during construction. We suggest adding in language to allow for the use of different locations if certain off site disposal areas are unavailable during construction. (See Page 4-14 first paragraph (wood poles and sawdust); Page 4-16, (trenching soil); Page 4-17, (jack and bore material), and Page 4-17, last paragraph (horizontal directional drilling material).) F1-7
8. **Page 4-17, Jack and Bore.** “Placement [of the jack and bore entrance and exit pits under the railroad] would be determined by PG&E engineering design and a Town of Windsor encroachment permit.” Please revise this sentence to: “Placement would be determined by PG&E engineering design, Town of Windsor encroachment permit, and/or consultation with SMART, as appropriate.” F1-8
9. **Page 4-26, Section 4.17.** The sentence “Distribution work would be similar to the proposed substation site (Site 8)” is actually referencing a previously considered substation site. Please delete this statement to avoid confusion. All other references to Site 8 as the proposed site in this alternatives analysis are accurate. F1-9
10. **Page 4-19, APM AE-1.** This APM could be read to apply to the entire project. We recommend adding clarification that this measure is intended only to apply to the substation. F1-10
11. **Page 4-19, APM AQ-4.** To clarify the intent of this measure, we recommend adding the following phrase to the end: “Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites, if visible soil material is present.” F1-11
12. **Page 5-2 and 5-3, Section 5.1.1, Proposed Substation, last paragraph.** Please delete this paragraph as it applied to the Mitchell Lane site. A conceptual landscape plan was developed for the proposed project site on Old Redwood Highway (Figure 5.1-3) and provided to the Town of Windsor. No changes are proposed to this landscape plan, and it should be considered final. F1-12

Comment Set F1, cont. Pacific Gas & Electric Company

Mr. Chiang
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13. **Page 5-3, fourth paragraph.** Please revise the third sentence to remove the reference to having security lighting on the north side as lighting may be placed on other sides of the substation as well. The sentence should read: “There would be free-standing light poles, approximately 12 feet tall placed around the substation.” F1-13
14. **Page 5-56, Section 5.4.2(b).** The MND states that “[i]f complete avoidance of vernal pools is not feasible, any permanent impacts to wetlands/vernal pools would be mitigated through purchase of mitigation credits or creation of wetlands based on an agency-approved plan.” PG&E may use tarps over vernal pools to avoid impacts to the area, which may not be technically considered ‘complete avoidance’ and should not be a trigger for purchase of mitigation credits or wetland creation. We recommend removing the beginning phrase, so that the sentence begins “Any permanent impact....” F1-14
15. **Page 5-57, Section 5.4.2(e).** The MND incorrectly states that PG&E has committed to complying with the Town of Windsor’s Tree Replacement Ordinance (Tree Ordinance). Due to the CPUC’s exclusive jurisdiction, the project is not subject to local regulations, including the Tree Ordinance. However, PG&E has agreed to replace trees in a way that is consistent with the Tree Ordinance. F1-15
16. **Page 5-79, Section 5.8, Hazards and Hazardous Material.** Reference is made in the introductory paragraph only to the Phase I Environmental Site Assessment by ERM in 2011; please add a reference to the Phase II assessment performed in January 2011. F1-16
17. **Page 5-97, Section 5.9.1, first paragraph.** Under the applicable regulations section, the MND includes reference to the Town of Windsor Storm Water Quality Ordinance No. 2008-249; however, this local ordinance does not apply to PG&E’s project. PG&E will comply with all applicable state storm water and water quality regulations associated with the project. F1-17
18. **Page 5-105, Section 5.10, Mitigation Measure LU-1.** The current notice provision in LU-1 requires signs to be posted along the affected roadways at least 30 days prior to construction. Construction will be taking place in many areas of town; having signs up more than 30 days ahead may be confusing to residents and create unnecessary visual blight. In addition, construction in some areas will be fairly brief. We suggest that the measure be revised to “at least 10 days advance notice” so that the noticing is not as intrusive to residents. F1-18
19. **Page 5-106, Section 5.10.2 (c), last paragraph.** Please delete the reference to Mitigation Measure B-5 (agency coordination and approval of a plan for construction within the preserve). This is an outdated reference; Mitigation Measure B-5 currently pertains to bats. F1-19
20. **Page 5-117, Section 5.13.2(a).** For reasons stated above under Comment #5, please revise the sentence in the first paragraph to read: “Substation (civil) construction would F1-20

Comment Set F1, cont. Pacific Gas & Electric Company

Mr. Chiang
August 14, 2013
Page 4

require up to 15 workers over the course of eight months, and distribution line work would require up to 16 workers over six to seven months.”

F1-20 cont.

21. **Page 5-120, Section 5.14.2(c), Schools.** Please revise the first sentence regarding substation construction and distribution to state: “Substation (civil) construction would require up to 15 workers over the course of eight months, and distribution line work would require up to 16 workers over approximately six to seven months.” The distribution timeframe should be revised to be consistent with the statements made in Section 5.13 and Section 5.16.

F1-21

22. **Page 5-123, Section 5.16.1, Setting, second paragraph.** “Old Redwood Highway borders the project substation site to the east; access to the substation site parcel would be directly off of Old Redwood Highway via a newly-installed curb cuts and driveways on the east side of the parcel”. Please revise to “...via driveways and future curb cuts on the east side of the parcel.”

F1-22

23. **SECTION 6, Table 6-1.** Please revise APM Bio-7 in Table 6-1 to be consistent with the APM BIO-7 description in Section 4. Project Description.

F1-23

24. **Section 5.4, Biology, Page 5-43.** The last sentence in the paragraph states: “If the PBO for ACE is not applicable, then a separate biological opinion from USFWS may be required for work at the proposed substation site”. As indicated on Page 5-51, we do not believe the project will significantly affect federally listed species. Accordingly, we recommend rewording this statement to, “If the proposed project cannot meet the permit qualifications and may affect the California tiger salamander and/or three plant species on the Santa Rosa Plain, then a consultation with the USFWS may be required for work at the proposed substation site”.

F1-24

25. Our PEA was submitted with all dimensions identified as ‘approximate’ because final engineering is not yet complete. We believe it is important to keep this flexibility language in the MND to avoid the need for any future project modifications. We have enclosed a bullet point list of the specific areas in which we believe the word “approximate” should be included (See Errata Sheet A).

F1-25

As a final note, we wished to point out that the construction schedule dates throughout the document are incorrect since the schedule has slipped somewhat. At this time, PG&E has targeted construction to begin in December 2014 to meet an in-service date of June 2016. Please note that this schedule may change due to a variety of factors, including delays associated with site acquisition or construction, funding constraints, etc.

F1-26

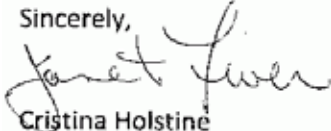
Comment Set F1, cont.
Pacific Gas & Electric Company

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PG&E appreciates the opportunity to provide these comments. Please feel free to contact me if further information or clarification is necessary.

F1-26 cont.

Sincerely,



Cristina Holstine
Senior Land Planner
Pacific Gas and Electric Company

cc:

David Kraska, Pacific Gas and Electric Company
Jo Lynn Lambert, Attorney for Pacific Gas and Electric Company
Kevin Janik, Pacific Gas and Electric Company
Janet Liver, TRC Solutions
Amy Morris, Aspen Environmental Group

Enclosures:

Errata Sheet A: Project Description "approximates"
Errata Sheet B: Typos

Comment Set F1, cont. Pacific Gas & Electric Company

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ERRATA SHEET A- Project Description "Approximates"

Global: Insert the term "approximately" when including dimensions and descriptions of project engineering. The following locations should be marked as approximated, as indicated.

1. **Page 4-1, Section 4, Project Description.** "The proposed substation site is..., approximately six miles from the existing Fulton Substation and approximately three miles from the existing Fitch Mountain Substation."
2. **Page 4-1, Section 4, Project Description.** "The north, east, and west sides of the substation would be bordered by approximately 10-foot tall prefabricated perimeter walls."
3. **Page 4-2, Section 4, Project Description, top of the page, first bullet.** "This would require replacing approximately 39 wooden poles (with 38 wood poles and 1 steel pole) and installation of approximately 2 new wood riser poles."
4. **Page 4-2, Section 4, Project Description, top of the page second bullet.** "This would require replacement of approximately 44 wooden poles with taller wood poles and the installation of approximately 3 additional wood riser poles."
5. **Page 4-2, Section 4, Project Description, first paragraph.** "An approximately 270-foot, 60 kV power line loop would be built between the TSP and the new substation."
6. **Page 4-2, Section 4, Project Description, second paragraph.** "This access road will be within the approximately 45 foot wide corridor extending approximately 500 feet east from Herb Road shown in Figure 5.4-1 (Biological Resources Mapset)."
7. **Page 4-4, Section 4.8, Setting and Surrounding Land Uses, fourth paragraph.** "The nearest homes are approximately 60 feet north and 160 feet west of the project property boundary and approximately 125 feet north and 200 feet west of the proposed substation fence line."
8. **Page 4-5, Section 4.9.1 Windsor Substation, last bullet.** "Two approximately 42-foot-high dead-end structures..."
9. **Page 4-7, Section 4.9.6, Power Lines.** "To loop the existing Fulton No. 1 60 kV circuit into and out of the substation, an existing wood pole located on the 60 kV power line, approximately 270 feet west of the substation property, would be replaced with a new approximately 75-foot-tall TSP. The pole would support a short power line looped to the substation's 42-foot-tall dead-end structures."

F1-27

Comment Set F1, cont. Pacific Gas & Electric Company

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10. **Page 4-7, Section 4.9.7 Distribution Lines.** "Circuit 1 would be approximately 458 feet long. Circuit 3 would be approximately 538 feet long..."
11. **Page 4-8, Section 4.9.7 Distribution Lines.**
 - a. "This rebuild would require approximately 39 new poles (38 wood replacement poles and 1 steel replacement pole) and approximately 2 new risers."
 - b. "Circuit 2 would head east in a conduit to pole b1, approximately 620 feet from the substation. Beginning from pole b1, where Circuit 2 rises overhead, approximately 1.8 miles of existing distribution line would be reducted along Old Redwood Highway. As part of the reducting, approximately 44 existing wood poles would be replaced with new taller wood poles and approximately 3 new riser poles would be installed along Old Redwood Highway. Circuit 2 would be undergrounded along Old Redwood Highway where there is existing undergrounding (approximately 320 feet at Rio Ruso, 270 feet at Dawn Way, and 480 feet at Godfrey Drive)."
12. **Page 4-10, Section 4.10.1, Construction, Table 4-2 heading.** "Approximated Volumes of Material Imported..."
13. **Page 4-13, Section 4.11.1, Pole Installation and Replacement, first paragraph.** "The TSP would reach a height of approximately 75 feet; two cross arms would extend approximately 4-feet laterally on each side of the pole."
14. **Page 4-14, Section 4.12, Pole Replacement.** "Distribution of the increased capacity provided by the new substation would require constructing approximately 1,161 feet of new underground circuits, rebuilding approximately 7,900 feet of the existing overhead Fulton No. 1 60 kV line and installing two underbuilt distribution circuits, and reducting approximately 9,420 feet of the 12 kV powerline along Old Redwood Highway."
15. **Page 4-14, Section 4.12.1, Pole Replacement.** "Proposed reducting and rebuilding of power lines for the proposed project would require replacement of approximately 88 wooden poles along two existing distribution lines and the installation of approximately 5 new riser poles."
16. **Page 4-15, Section 4.12.3 Underground Installation.** "A total of approximately 796 cubic yards of spoils..."

F1-27 cont.

Comment Set F1, cont. Pacific Gas & Electric Company

Mr. Chiang
August 14, 2013
Page 8

ERRATA SHEET B – Typographical Errors

F1-27 cont.

The following typos were identified when reviewing the Project Description

1. **Page 4-1:** A period is missing at the end of the first bullet in the list at the bottom of the page.
2. **Page 4-6:** The sentence immediately preceding Section 4.9.2 (Site Access) “would be” is repeated.
3. **Page 4-9:** Table 4-1, left column, second to last row, should state, “Total for Future Circuits” (missing “C”); left column, last row, should state, “Total for Initial and Future Circuits” (missing “Circuits”); and Note 1 has extra “be” repeated after “initially.”
4. **Page 4-10:** The end bracket is missing at the end of the sentence preceding Table 4-2.
5. **Page 4-10, Table 4-2:** Truck Trips for removal of material from Jack and Bore Entry and Exit Pits should be 20 (not 200). Total volume of material to be removed is correct.
6. **Page 4-13:** The second paragraph from the bottom contains two periods before the last sentence.
7. **Page 4-15, Section 4.12.2 Reconductoring:** The second to last sentence of first paragraph should be “...would require an area of approximately 400 to 500 square feet...” As opposed to, “and area”).
8. **Page 4-16, Open Trenching:** A period is missing from the second line “... conditions and requirements Where used, trenches ...”
9. **Page 4-17:** Second paragraph from the bottom of the page, “Exact locations for entry and exit pits have not yet to be determined by PG&E ...” Remove “not” from the sentence. Also in the same paragraph, add “the” to “In this event, the boring process ...”, and remove “drill” from “... by maintaining the drill drilling fluid pressure ...”
10. **Page 5-22:** The Town of Windsor General Plan is bolded and bulleted. This appears to be a typo.
11. **Page 5-47, Special Status Plants:** “Burke’s goldfieldsKerry Conservation Site (CDFW 2013). in the past.” Remove the period preceding “in the past.”
12. **Page 5-94, second paragraph, last sentence:** “The inlet directs water south towards the middle of the site; the termination point for this runoff is unknown. (TRC 2012).” This should reference (PG&E 2011).

Responses to Comment Set F1 Pacific Gas & Electric Company

- F1-1 PG&E states that they appreciate the effort expended in preparing the IS/MND and the opportunity to provide minor comments and suggestions. PG&E notes that the on Page 4-1 (in Section 4, Project Description), fourth paragraph, the list of pole replacement locations should also include Wilcox Road, Starr Circle, Railroad Avenue, and Joni Court. In response, Page 4-1 has been revised as follows:
- Access to the substation property would be from Old Redwood Highway and Herb Road (public section). Pole replacement and line work would occur along Old Redwood Highway, Starr Road, ~~and Gumview Road~~, Wilcox Road, Starr Circle, Railroad Avenue and Joni Court.
- F1-2 PG&E requests deletion of “at the Fulton No. 1 60 kV Power Line” in the middle paragraph of Page 4-8 in Section 4.8.7 (Project Description, Distribution Lines) because not all of the circuits are being capped there. In response, Page 4-8 has been revised as follows:
- Initially, the nine future circuits would be stubbed and capped ~~at the Fulton No. 1 60 kV Power Line~~. The ultimate location of these circuits beyond their termination points will be determined in the future, based on demand and engineering. The partial installation of the nine future distribution-circuit conduits at this time would prevent future disruption of landscaping at the substation property.
- F1-3 PG&E requests that Figure 4-4 be dated “PG&E 2013” instead of “PG&E 2012.” The figure has been revised as requested for the Final IS/MND.
- F1-4 PG&E notes that water used during construction may be supplied by sources other than the Town of Windsor, including a nearby well adjacent to Herb Road or construction baker tanks. The final paragraph in Section 4.10.1 (Substation Construction) has been revised to reflect this clarification:
- The final stage of substation construction would be landscaping, including installation of an irrigation system. The proposed site property is outside the Town of Windsor’s recycled water service area. The Town of Windsor ~~would~~ may supply both potable water for irrigation and water for construction purposes such as dust control from an existing valve box along Old Redwood Highway at the eastern edge of the proposed site. Water may also be obtained from a well adjacent to Herb Road or from construction baker tanks. Construction crew members would drink bottled water.
- F1-5 PG&E requests that the Project Description (Section 4.10.3, Page 4-12) be revised to state “Substation work (civil construction) would occur over eight months.” This revision has been made as requested.
- F1-6 PG&E requests that “by the end piece of the conductor spool” be deleted from the final paragraph on Page 4-13 (Section 4.11.1). This section has been revised as follows:
- Once the 12 kV circuits have been moved, a tracked drilling rig would excavate the TSP’s foundation. The rig would auger a hole between five feet and eight feet in diameter and approximately 15 to 20 feet deep, with the exact depth determined by local soil characteristics. Excavated soil would be tested and disposed of in accord-

ance with applicable regulations or reused. The completed hole would be temporarily covered by the end piece of a conductor spool until installation of the new foundation.

- F1-7 PG&E notes states that the exact location of disposal sites for wooden poles, excavated soil, soil transportation and removal could change depending on the availability of disposal locations during construction. PG&E requests adding language on page 4-14 (wood poles and sawdust); page 4-16 (trenching soil); page 4-17 (jack and bore material); and page 4-17 (HDD material) to reflect that different disposal sites may be used based on availability. Page 4-14 and 4-17 have been revised to include that disposal may occur at "another appropriated available facility as necessary."
- F1-8 PG&E requests that a sentence on Page 4-17 (Section 4.12.1, Underground Installation) be revised to state "Placement would be determined by PG&E engineering design, Town of Windsor encroachment permit, and/or consultation with SMART, as appropriate." Page 4-17 has been revised as requested for the Final IS/MND.
- F1-9 PG&E asks that the sentence "Distribution work would be similar to the proposed substation site (Site 8)" on Page 4-26 (Section 4.17, Site Alternative 1) be deleted to avoid confusion. The requested revision has been made.
- F1-10 PG&E requests that APM AE-1 be revised to clarify that it applies only to the substation site. APM AE-1 has been revised as follows:

APM AE-1: Additional landscaping comprised of trees and shrubs will be included along Herb Road and along the east edge of the substation site in the setback area from Old Redwood Highway to provide additional screening and reduce project visibility. Suggested plant material includes a mix of redwood trees and evergreen native oaks with a small number of deciduous accent trees. Landscaping under transmission lines will consist of small trees and/or shrubs to allow for overhead clearance. All planting will be consistent with PG&E operational requirements for landscaping in proximity to electric transmission facilities.
- F1-11 PG&E requests that APM AQ-4 be revised as follows: "Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites, if visible soil material is present." The requested revision has been made to APM AQ-4.
- F1-12 PG&E asks that the paragraph following Table 5.1-1 on Page 5-2 and 5-3 (Section 5.1.1, Aesthetics) be deleted because it applied to a previous site. PG&E notes that a conceptual landscape plan was developed for the proposed project on Old Redwood Highway (Figure 5.1-3) and was provided to the Town of Windsor on August 29, 2012. PG&E states that no changes are proposed to this plan, and it should be considered final. This paragraph has been deleted as requested.
- F1-13 PG&E requests that the fourth paragraph on Page 5-3 be revised to clarify that there may be security lighting on other sides of the substation in addition to on the north side. This paragraph has been revised as follows:

Security lighting ~~for~~ surrounding the substation would consist of sodium vapor lamps. On the south side of the substation, five lights would be mounted 9.5 feet above the ground with three located on the steel gantry structure and one between the transformer and switchgear. On the north side of the substation, there would be free-standing light poles, approximately 12 feet tall.

F1-14 PG&E requests that Page 5-56 (Section 5.4.2[b]; Biological Resources, Environmental Impacts and Mitigation) be revised to remove the phrase “if complete avoidance of vernal pools is not feasible.” The final paragraph of Section 5.4.2[b] has been revised as follows:

Both direct and indirect impacts to vernal pools would be minimized by **Mitigation Measure B-2** (Preserve special-status plants, wetlands, and vernal pools) as described above in the discussion of listed plants. This measure requires clear marking of all wetlands and water features as environmentally sensitive areas and the use of BMPs to avoid wetland impacts. ~~If complete avoidance of vernal pools is not feasible, a~~Any permanent impacts to wetlands/vernal pools would be mitigated through purchase of mitigation credits or creation of wetlands based on an agency-approved plan. With implementation of APMs and **Mitigation Measure B-2**, impacts to sensitive natural communities (i.e., wetlands and other waters) would be less than significant.

F1-15 PG&E states that the IS/MND incorrectly describes that PG&E has committed to complying with the Town of Windsor’s Tree Replacement Ordinance. PG&E notes that because of the CPUC’s exclusive jurisdiction, the project is not subject to this local tree ordinance. However, PG&E has agreed to replace trees in a manner that is consistent with the Town’s tree ordinance. Section 5.4.2[e] has been revised as follows:

The Town of Windsor’s Tree Preservation and Protection Ordinance (Ordinance), regulates protection, preservation, maintenance, and removal of protected trees. Trees that occur within the survey area that are protected under the Ordinance include oaks with a diameter at breast height (dbh) of six inches or more. Construction of the proposed project would require removal of at least three trees, ~~which may be covered by the Ordinance.~~ Because the CPUC has exclusive jurisdiction as described in Section 5.10 (Land Use and Planning), the proposed project is not subject to the Town’s tree ordinance. However, PG&E has agreed to replace trees in a manner that is consistent with the Town’s tree ordinance.

According to the Ordinance Amendment (section 27.36.061), mitigation for impacts to protected trees should “generally replace a smaller quantity of larger trees by replanting a larger quantity of smaller trees, with the goal of restoring the original canopy area and volume after ten years.” In addition, the Ordinance Amendment requires preparation of an arborist report for all development projects with protected trees. The arborist report would provide recommendations on the removal of trees and mitigation to offset loss of protected trees. ~~PG&E has committed to comply with the Ordinance.~~ **APM BIO-15** commits PG&E to marking valley oaks and oak woodlands as environmentally sensitive and avoiding these areas to the extent practical. If any protected oak trees are removed, they would be replaced during landscaping in a manner consistent with the Town of Windsor’s Ordinance for Tree Mitigation.

F1-16 PG&E requests that the Final MND include a reference on Page 5-79 (Section 5.8, Hazards and Hazardous Material) to the Phase II Environmental Site Assessment by ERM performed in January 2011. Page 5-79 has been revised as follows:

This analysis is based on ~~a~~ Phase I and Phase II Environmental Site Assessments by ERM in 2011 (ERM 2011a and 2011b) and on a search of the State Water Resources Control Board’s GeoTracker Database and California Department of Forestry and Fire Protection maps.

F1-17 PG&E requests that because the CPUC has exclusive jurisdiction, the reference to the Town of Windsor Storm Water Quality Ordinance No. 2008-249 be deleted (Page 5-97, Section 5.9.1 [Hydrology and Water Quality], first paragraph). The description of the Town of Windsor's Storm Water Quality Ordinance has been deleted from the Final IS/MND.

F1-18 PG&E notes that Mitigation Measure LU-1 in the Draft IS/MND requires posting signs at least 30 days prior to construction. PG&E requests that the requirement be revised to state that residents shall be given "at least 10 days advance notice," because construction would take place in many areas of the Town and having signs up for a longer period may be confusing. Mitigation Measure LU-10 has been revised as follows:

Provide advance notice of construction. *Advance Notice.* Prior to construction, the Applicant shall give at least ~~30~~10 days advance notice of the start of any construction-related activities.

F1-19 PG&E requests removal of reference to Mitigation Measure B-5 on Page 5-106 in Section 5.10.2(c) in the Biological Resources Section. PG&E notes that the current version of Mitigation Measure B-5 applies to bats rather than to agency coordination. Section 5.10.2(c) has been revised as follows:

In January 2012, CDFW indicated that the title to 3.4 acres of this parcel will be transferred to CDFW. As of May 2012, the Kerry Conservation Site is on hold as a result of funding constraints (PG&E 2011-2013). Numerous APMs and mitigation measures for biological resources, including **Mitigation Measure B-2** (Preserve special-status plants, wetlands and vernal pools) would reduce potential impacts to listed plant habitat on the Kerry Conservation Site. These APMs are listed in Section 5.4.2(f). ~~In addition, Mitigation Measure B-5 requires agency coordination and approval of a plan for all construction and maintenance activities within the preserve area. With implementation of these measures, proposed project conflicts with the Santa Rosa Plain Conservation Strategy would be less than significant.~~

F1-20 PG&E reiterates Comment F1-5 and requests that Page 5-117, Section 5.13.2(a) in the Population and Housing Section be revised to read: "Substation (civil) construction would require up to 15 workers over the course of eight months, and distribution line work would require up to 16 workers over six to seven months." Page 5-117 has been revised as requested.

F1-21 PG&E reiterates Comment F1-5 and requests that Page 5-120, Section 5.14.2(c), Schools in the Public Services Section be revised to state: "Substation (civil) construction would require up to 15 workers over the course of eight months, and distribution line work would require up to 16 workers over approximately six to seven months." Section 5.14.2(c) has been revised as follows:

Substation (civil) construction would require up to 15 workers over the course of eight months, and distribution line work would require up to 16 workers over ~~four to five~~ six to seven months.

F1-22 PG&E requests that the second paragraph on Page 5-123, Section 5.16.1 (Transportation/Traffic) be revised as follows:

"Old Redwood Highway borders the project substation site to the east; access to the substation site parcel would be directly off of Old Redwood Highway via ~~a newly installed curb cuts and driveways~~ and future curb cuts on the east side of the parcel."

Section 5.14.2(c) has been revised as requested.

F1-23 PG&E requests that APM BIO-7 in Table 6-1 (Section 6 [Mitigation Monitoring Plan], Page 6-7) be revised consistent with APM BIO-7 in Section 4 (Project Description). The version of APM BIO-7 in the Mitigation Monitoring Plan of the Draft IS/MND has been replaced with the correct version from the Project Description as requested.

F1-24 PG&E requests that the last sentence on Page 5-43 in Section 5.4 (Biology, Applicable Regulations) be revised from "If the PBO for ACE is not applicable, then a separate biological opinion from USFWS may be required for work at the proposed substation site" to "If the proposed project cannot meet the permit qualifications and may affect the California tiger salamander and/or three plant species on the Santa Rosa Plain, then a consultation with the USFWS may be required for work at the proposed substation site." The revision has been made as requested:

The PBO provides the framework for mitigation, conservation, translocation, and appropriate minimization measures. USFWS and CDFW will track project impacts, mitigation and other pertinent information. ~~If the PBO for ACE is not applicable, then a separate biological opinion from USFWS may be required for work at the proposed substation site.~~ If the proposed project cannot meet the permit qualifications and may affect the California tiger salamander and/or three plant species on the Santa Rosa Plain, then a consultation with the USFWS may be required for work at the proposed substation site.

F1-25 PG&E states that in the PEA for the proposed project, dimensions were identified as approximate because final engineering is not yet complete. PG&E enclosed Errata Sheet A listing 25 places where they would like the Final IS/MND to be revised to include the word "approximately." Instead of inserting "approximately" in all of the locations requested in Errata Sheet A, the following language has been added to Section 4, Page 4-2:

Please note: Dimensions and pole numbers identified in the Project Description and elsewhere in the IS/MND are approximate because final engineering is not yet complete. Slight changes may be necessary based on final engineering requirements, but any changes would comply with applicable regulations, applicant proposed measures, and mitigation measures.

F1-26 PG&E notes that the construction dates in the IS/MND are now incorrect because the planned schedule has been pushed back. PG&E states that construction is now targeted to begin in December 2014 to meet an in-service date of June 2016, but this schedule may still change due to a variety of factors. Section 4.10.3 (Project Description, Construction Workforce and Schedule) and an addition schedule reference in Section 5.16 (Transportation/Traffic) have been revised to reflect the new schedule.

F1-27 PG&E's Errata Sheet B includes a list of 15 identified typographical errors. These have been dealt with as follows in the Final IS/MND:

1. A period has been added to the end of the first bullet at the end of Page 4-1 (Section 4, Project Description).
2. The duplicate "would be" has been deleted from Page 4-6 immediately preceding Section 4.9.2 (Project Description, Site Access).

3. Table 4-1 on Page 4-9 (Project Description, Project Components, Distribution Lines) has been revised to include the word “circuits” in the final two rows, and the duplicate “in” has been deleted.
4. The parenthesis mark has been added to end of the sentence preceding Table 4-2 on Page 4-10 (Section 4.10, Substation Construction).
5. Table 4-2 on Page 4-10 the number of truck trips for removal of material from Jack and Bore entry and exit pits has been revised to show the correct number: 20 instead of 200.
6. The duplicate period on Page 4-13 has been deleted.
7. A phrase in the first paragraph in Section 4.12.2 (Project Description, Reconductoring) has been revised from “and area” to “an area.”
8. A period has been added to the first paragraph in the section on open trenching on Page 4-16 (Project Description, Reconductoring, Underground Installation).
9. In the second paragraph from the bottom on Page 4-17 in the description of horizontal directional drilling, the word “not” has been removed and the words “not” and “drill” have been removed, and the word “the” has been added.
10. Page 5-22 (Section 5.3.1, Air Quality, Regulatory Setting), the bullet has been removed from “Town of Windsor General Plan.”
11. In the second paragraph in the discussion of special-status plants on Page 5-47 (Section 5.4.2[a] in Biological Resources), the first reference to “in the past” has been removed.
12. The reference at the end of the second paragraph on Page 5-94 (Section 5.9.1, Hydrology and Water Quality) has been revised from “TRC 2012” to “PG&E 2011.”
13. This requested revision was not made. The requested capitalization is not consistent with the rest of the document.
14. The bold type has been removed from APM BIO-14 on Page 6-8 in Section 6 (Mitigation Monitoring Plan).
15. The sentence beginning “Design and project construction activities...” in Mitigation Measure B-2 on Page 6-9 (in Section 6, Mitigation Monitoring Plan) has been demarcated with a bullet.