


CENTRAL VALLEY NATURAL GAS STORAGE PROJECT	VARIANCE REQUEST FORM	
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Date Required:	September 12, 2011	Variance Request No.:	No. 10 – Additional Work Space along PG&E Line 400/401 Interconnection
Date Submitted:	September 7, 2011	Location:	The additional work space is located along the PG&E Line 400/401 interconnection pipeline. This area is located south and west of the metering station site.
Property Owner(s):	Leo Holthouse	Parcel No.:	011-140-004
Current Land Use:	Non-native annual grassland previously used for rangeland grazing	Sensitive Resources:	The non-native annual grassland provides suitable habitat for western burrowing owls. No other sensitive biological or cultural resources have been identified in the additional work area.

Variance from: This variance requests the CPUC’s approval to expand the work area along the Line 400/401 interconnection pipeline for fire suppression purposes and stock piling of soil.

Description and Justification for Variance: As shown in the attached figure, CVGS is requesting additional work space to accommodate fire suppression activities and to stock pile soil material. Prior to installation of the interconnection, the area would be graded and all herbaceous vegetation removed to minimize the potential for a grass fire.

Environmental Analysis: A brief description of the potential environmental effects associated with the additional work space is provided below.

Aesthetics. The additional temporary work space will not affect the existing character of the area and no impacts on aesthetics or visual resources are anticipated. No mitigation is required.

Agricultural and Forestry Resources. The work space occurs in annual grassland that has been previously seeded with wheat and used for livestock rangeland. No forestry resources occur in the project area. The area has not been designated as prime or unique farmland. No impacts on agricultural or forestry resources are anticipated. However, CVGS will implement APM AGRI-1 and AG-1 prior to use of the additional work area. No new mitigation has been identified.

Air Quality and GHG Emissions. Use of the additional work area would not result in any new or greater impacts than were previously described in the MND. CVGS will implement the appropriate APMs and mitigation measures identified in the MND to avoid and minimize potential short-term construction-related air quality impacts

associated with use of the additional work area. No new mitigation has been identified. CVGS will implement APMs AIR-1, AIR-2, and AIR-3, when appropriate.

Biological Resources. An ICF biologist walked the additional work area on September 7, 2011. No burrowing owls or other sensitive biological resources were observed during this recent and previous surveys in the area. Additional preconstruction surveys will be conducted prior to the use of the additional work area and the appropriate biological resource APMs will be implemented. No new mitigation has been identified.

Cultural Resources. No impacts on cultural resources are anticipated and no mitigation has been identified.

Geology and Soils. The use of the staging areas will not result in any effects related to geologic, soil, and seismic site conditions. No mitigation is required.

Hazards and Hazardous Materials. No hazardous materials will be stored or used at the staging areas. However, CVGS will implement the appropriate APMs and mitigation measures identified in the MND to avoid and minimize potential impacts, including APMs HAZ-1 and HAZ-2 and mitigation measure HAZ-3. No new mitigation has been identified.

Hydrology and Water Quality. No drainages or other surface water features will be directly impacted during use of the additional work area. The SWPPP BMP map for this area is being revised to include the additional work space. Appropriate measures outlined in the project SWPPP will be implemented during site preparation activities and use of the additional work area. No new mitigation has been identified.

Land Use and Planning. No potentially significant impacts related to land use have been identified. No mitigation is required.

Mineral Resources. Use of the additional work area would not have a significant effect on mineral and energy resources and would not result in the loss of the availability of the resources because none occur in the project area. No mitigation is required.

Noise. There are no sensitive receptors located near the proposed additional work area. Therefore, the use of the work area would not result in any new or greater impacts related to noise. No new mitigation has been identified.

Population and Housing. Use of the additional work area would not result in any new or greater impacts than were previously described in the MND. No mitigation is required.

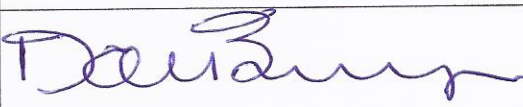

Public Services. Use of the additional work area would not result in any new or greater impacts on public services than were discussed in the MND. No mitigation is required.

Recreation. Use of the additional work area will not increase the use of public recreation facilities and will not require the expansion of recreation facilities. In addition, the proposed use of the work area would not result in any new or greater impacts on recreation activities than were discussed in the MND. No new mitigation has been identified.

Transportation/Traffic. The use of the additional work area will not affect local traffic on the nearby Dirks Road. Roads to and from the staging areas will remain open during the work period and no road closure is proposed. The proposed use of the additional work area would not result in any new or greater impacts on transportation than were discussed in the MND. No mitigation is required.

Utilities and Service Systems. The use of the additional work area would not require an expansion or improvement in utilities or service systems, including wastewater and water supply treatment or delivery. In addition, the use of the work area would not result in any new or greater impacts on recreation activities than were discussed in the MND. No new mitigation has been identified.

Site Conditions/Comments: The additional work area along the PG&E Line 400/401 interconnection occurs in an area that was previously planted in wheat and is now predominantly non-native annual grassland.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Mgr				
Central Valley Construction Manager	9/7/11	Dirk de Bruyn		
Central Valley Environmental Manager	9/7/11	Susan Bushnell Bergfalk		None

Prepared by: Susan Bushnell Bergfalk, Environmental Manager, ICF International Date: September 7, 2011