

CENTRAL VALLEY NATURAL GAS STORAGE PROJECT	VARIANCE REQUEST FORM	
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Date Required:	September 30, 2011	Variance Request No.:	No. 11 – Modification of APM BIO-12 and Work Period Extension to November 1, 2011
Date Submitted:	September 19, 2011	Location:	Giant garter snake aquatic habitat areas between compressor station and Glenn-Colusa Canal
Property Owner(s):	All landowners listed in Appendix E of IS/MND.	Parcel No.:	All APNs listed in Appendix E of IS/MND.
Current Land Use:	Primarily agricultural land uses	Sensitive Resources:	Most of the pipeline work area is in fallow rice fields which (when flooded) provide suitable aquatic habitat for giant garter snake. Adjacent upland levees and berms provide suitable refugia habitat for giant garter snakes.

Variance from: This variance requests the CPUC’s allow CVGS to modify their applicant proposed measure (APM) BIO-12 (Implement avoidance and minimization measures during construction is giant garter snake habitat). This APM states that CVGS will “time construction activities within habitat so that they occur between May 1 and October 1.” CVGS submitted a formal request to the U.S. Army Corps of Engineers (Corps) (Mr. Peck Ha) to reinitiate consultation with the U.S. Fish and Wildlife Service (Service) (Mr. Ben Watson) to support an amendment to the Biological Opinion to allow construction to proceed up to November 1, 2011. A copy of the reinitiation request letter that was sent to the Corps and the Service is provided with this variance request form. Once the Biological Opinion and Individual Permit have been amended to allow construction up to November 1, 2011, a copy will be provided via email to the CPUC.

Description and Justification for Variance: The reason for this extension request is that construction of the pipeline portion of the project was delayed and restoration and cleanup of the pipeline work area is expected to extend into October. The construction activities that would occur during the October 1 to November 1 time period are associated with the underground, buried natural gas pipeline system and the work includes final clean-up and restoration activities. The work area extends approximately 14 miles between the compressor station and the Glenn-Colusa Canal. This 14-mile pipeline work area is primarily fallow rice fields that will be lazer-leveled and flooded by the landowners after pipeline construction is finished in the fall.

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

Aesthetics. The work period extension 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. CVGS has been coordinating with agricultural land owners to inform them of the extended work period. This work period extension and the activities that will occur during this timeframe will not adversely affect rice harvesting activities. No mitigation is required.

Air Quality and GHG Emissions. The work period extension 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. As stated above, CVGS has requested an amendment to the Biological Opinion to allow construction to occur through October. In addition to the existing APM BIO-12 measures and Biological Opinion conditions, any additional new conditions that are attached to this amendment will be implemented as part of the October work. A copy of the amendment will be provided to the CPUC to support issuance of this variance.

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

Geology and Soils. The extended work period will not result in any effects related to geologic, soil, and seismic site conditions. No mitigation is required.

Hazards and Hazardous Materials. The extended work period will not result in any new or greater impacts related to hazards and hazardous materials. 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 new hydrologic or water quality impacts are anticipated. Appropriate measures outlined in the project SWPPP will be implemented during the October work period. 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. The work period extension 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. The work period extension would not result in any new or greater impacts related to noise. No new mitigation has been identified.

Population and Housing. The work period extension would not result in any new or greater impacts than were previously described in the MND. No mitigation is required.



Public Services. The work period extension would not result in any new or greater impacts on public services than were discussed in the MND. No mitigation is required.

Recreation. Hunting season in the project area begins on October 23. All of the pipeline construction work will be done on the four properties that have most of the hunting in the area (Pierre, Etcheren, Perez, and Gunnersfield). CVGS does not anticipate any conflicts between the pipeline restoration and clean-up work and hunting season activities because most of the work will be completed by October 23. The work period extension will not increase the use of public recreation facilities and will not require the expansion of recreation facilities. No mitigation is required.

Transportation/Traffic. Extension of work into October 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. Extension of work into October would not require an expansion or improvement in utilities or service systems, including wastewater and water supply treatment or delivery. No new mitigation has been identified.

Site Conditions/Comments: None.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Mgr				
Central Valley Construction Manager	9/19/11	Dirk de Bruyn		
Central Valley Environmental Manager	9/19/11	Susan Bushnell Bergfalk		None

Prepared by: Susan Bushnell Bergfalk, Environmental
Manager, ICF International

Date: September 19, 2011