

PUBLIC UTILITIES COMMISSION

300 CAPITAL MALL, 5TH FLOOR
SACRAMENTO, CA 95814



March 8, 2019

VIA MAIL AND EMAIL

Jillian Blanchard
Attorney at Law
1101 Marina Village Parkway, Suite 201
Alameda, CA 94501

Re: Comments on Proponent's Environmental Assessment Pacific Gas and Electric Company's
(PG&E's) Humboldt Bay-Humboldt #1 60 kV Reconductoring Project (Application 19-02-004)

Dear Ms. Blanchard:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has conducted a review of PG&E's Application (A.19-02-004) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct PG&E's proposed Humboldt Bay-Humboldt #1 60 kV Reconductoring Project (Project) that was filed at the CPUC on February 7, 2019.

Section 15100 of CEQA requires the agency responsible for the approval of a proposed project assess the completeness of the project proponent's application. The Energy Division uses CPUC's Information and Criteria List and PEA Checklist for Transmission Line Projects as the guide for determining adequacy of project applications.

After review of PG&E's application for the Project, the Energy Division finds that the PEA does not contain adequate information to satisfy the requirements of the Information and Criteria List (see Attachment 1, PEA Review for a list of deficiencies), and recommends that the PEA be supplemented to include the identified information in order for the application to be deemed complete.

Information provided by PG&E in response to the Energy Division's finding of deficiency should be filed as supplements to Application A.19-02-004. Please send two sets of responses to the Energy Division, in both hardcopy and electronic formats.

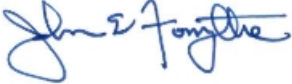
The CPUC requests that PG&E respond to this report no later than April 8, 2019.

Upon receipt of this information, the CPUC will review it within 30 days and determine if it is adequate to deem the PEA and amended application complete. We will be available to meet with you at your convenience to discuss these items.

In addition to the aforementioned information, the Energy Division may request additional data, as necessary, to prepare a complete and adequate analysis of the potential environmental effects of the Project in accordance with the requirements of CEQA.

Please do not hesitate to call me at (916) 327-6782 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "John E. Forsythe".

John E. Forsythe, AICP
Project Manager
Energy Division

cc: Lon Maier, CPUC Energy Division
Cory Barringhaus, ESA

Attachment:

1) PEA Review

Proponent's Environmental Assessment (PEA) Review

PG&E Humboldt Bay-Humboldt #1 60 kV Reconductoring Project (Application 19-02-004)

Review of the Application and PEA for the Humboldt Bay-Humboldt #1 60 kV Reconductoring Project (Application 19-02-004) was based on the CPUC PEA Checklist for Transmission and Substation Projects, October 7, 2008. Based on these criteria, the following additional information is needed in order to deem the application and PEA complete.

Coversheet

No comments.

Table of Contents

No comments.

Chapter 1: PEA Summary

No comments.

Chapter 2: Project Purpose and Need and Objectives (Included in PEA Chapter 2)

No comments.

Chapter 3: Project Description (PEA Chapter 2)

3.7.1.1 Staging Areas

1. Only 2 of the 11 potential staging areas described on PEA p.2.0-17 are shown on PEA Figure 2.8-1. Update Figure 2.8-1 to show other potential staging areas and provide a key to their locations. Also provide updated GIS showing the potential staging areas. Confirm all staging areas will be between 0.5 and 1.5 acres.

3.7.1.3 Access Roads and/or Spur Roads

2. Provide the estimated road widths and lengths of proposed access roads as shown in PEA Table 2.8-1.

3.7.1.4 Helicopter Access

3. Identify which poles are proposed for removal or installation using a helicopter.
4. Figure 2.8-1 shows 9 potential helicopter landing zones. However, some landing zones are unlabeled and labeling only goes up to "LZ-7". Confirm the number of landing zones. Provide approximate dimensions of the landing zones, and a key to the landing zones on Figure 2.8-1. Confirm GIS accurately reflects landing zone information.

5. PEA Section 2.8.1.4 states, “The staging areas listed above also may be used as helicopter landing zones with the exception of the staging area located at Redwood Acres Fairgrounds.” Confirm this statement is accurate. If so, please show on Figure 2.8-1 in conjunction with request #1, above, or provide a separate figure showing all helicopter landing zones.

3.7.2.1 Pull and Tension Sites

6. PEA p.2.0.17 states there will be approximately 14 pull sites needed for Project construction. However, Figure 2.8-1 shows 17 pull sites. Confirm the number and location of pull sites in the text and on Figure 2.8-1. Confirm GIS accurately reflects pull and tension sites.

3.7.2.3 Conductor/Cable Installation

7. PEA p.2.0-5 indicates the Project would cross four waterways (Buhne Slough, Elk River, Martin Slough, and Ryan Slough). Describe any special methodologies that would be used to cross and/or conduct work in proximity to these resources.

3.7.6 Construction Schedule (Nighttime Construction)

8. PEA p.3.1-39 states, “Nighttime construction is not planned and would not occur unless required for clearances, or other safety or logistics concerns that would take place under very limited, short-term circumstances.” Update PEA Section 2.8.8 with proposed nighttime construction information.
9. Describe the estimated frequency (number of days per year) and duration of nighttime construction.
10. Describe circumstances when clearances would require nighttime construction.
11. Describe and provide examples of “other safety or logistics concerns” that would require nighttime construction.

3.8 Operation and Maintenance

12. If helicopters will be used, provide an estimate of the frequency and duration of helicopter use during operation and maintenance activities.

Chapter 4 & 5: Environmental Setting and Impact Assessment Summary (PEA Chapter 3)

3.1 Aesthetics

No comments.

3.2 Agriculture and Forestry Resources

No comments.

3.3 Air Quality

No comments.

3.4 Biological Resources

13. The vegetation mapping appears to date from 2016. Habitat maps cite SRS 2018, but this document is not in the reference list, and 2018 surveys are not mentioned in the report. Please provide this document or update the reference to indicate the origin and date of habitat type mapping.

3.5 Cultural and Paleontological Resources

14. Per the PEA Checklist, please provide copies of the records found as part of the literature search.

3.6 Geology and Soils

No comments.

3.7 Greenhouse Gas Emissions

No comments.

3.8 Hazards and Hazardous Materials

15. Per the PEA Checklist, provide copies of the Hazardous Substance Control and Emergency Response Plan, Health and Safety Plan.

16. Per APM HAZ-3: Fire Risk Management, provide copies of any applicable fire risk management plans for the Project.

3.9 Hydrology and Water Quality

No comments.

3.10 Land Use and Planning

17. Per the PEA Checklist, provide GIS data of all parcels within 300' of the Proposed Project with the following data: APN number, mailing address, and parcel's physical address.

3.11 Mineral Resources

No comments.

3.12 Noise

No comments.

3.13 Population and Housing

No comments.

3.14 Public Services

No comments.

3.15 Recreation

No comments.

3.16 Transportation and Traffic

18. Please provide more recent Caltrans traffic data: 2017 data is available for total volumes; 2016 data is available for truck volumes.

19. The PEA states that, "Because construction locations and activities will be temporary and shift locations over an approximate 6-month period along the linear construction of the project, construction-related activities will not last long enough to conflict with any traffic plans, ordinances, or policies that establish measures of effectiveness for the performance of the circulation system."

The analysis of impacts due to construction workers/trucks needs to be expanded. As stated in Section 2.8.8, *Construction Workforce and Equipment*, at peak of construction, there may be as many as 10 crews during day clearances to install the conductors and to minimize the length and number of line clearances. How many daily truck/worker trips would this generate? This maximum traffic impact scenario should be quantified with respect to existing traffic volumes/LOS on the roadways described in 3.16.3, *Environmental Setting*.

3.17 Utilities and Services Systems

20. Provide state and local regulations regarding water, stormwater, wastewater, and solid waste in the Regulatory Background section.
21. Provide estimates of wastewater generated by the Project, water needs for the Project, and solid waste which would be generated from the Project in CY (cubic yard).
22. Provide PG&E's proposed plan for achieving CalGREEN-required diversion of 65% of nonhazardous construction and demolition debris, including the volume of debris that would be recycled or disposed in a landfill.

3.18.3 Cumulative Impacts

No comments.

Chapter 6: Detailed Discussion of Significant Impacts (PEA Chapter 3)

23. Provide information to support the following statement on PEA p.3.13-3: "While the project will improve the electric transmission system reliability, power availability and reliability in the area are not a constraint to population growth."

Chapter 7: Other Process-Related Data Needs

No comments.