

PG&E Humboldt Bay-Humboldt #1 60 kV Reconductoring

Project (Application 19-02-004)

Response to Deficiency Letter Issued March 8, 2019

Below are PG&E responses to the list of questions received from the CPUC in the deficiency letter dated March 8, 2019. In addition, PG&E will be submitting separately updated confidential GIS data to the CPUC (referred to below as the “updated GIS data”).

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.

PG&E Response: The 11 staging areas are shown on the revised Figure 2.8-1 (enclosed as Attachment A). All staging areas are also helicopter landing zones (LZ) with the exception of the staging area located at Redwood Acres Fairground (SA-9). Section 2.8.11, page 2.0-17, of the PEA lists 11 potential staging areas, which is the correct number. However, the parking lot at Elks Lodge is a pull site, not a staging area, and there are two potential staging areas accessed by Golden West Drive, labelled as LZ-2 and LZ-3 on the original Figure 2.8-1. The revised labelling on the attached figure and the updated GIS data identifies staging areas as either LZ or LZ/SA to indicate their proposed use. The exact size and location of staging areas within the surveyed areas shown on Figure 2.8-1 and accompanying the updated GIS data will be determined at the time of construction. Eight out of the 11 surveyed areas are less than 1 acre. Of the remaining three staging areas, one of the surveyed areas is approximately 1.5 acres (Elk River Road) and one is approximately 4.1 acres (the larger of the two staging areas accessed from Golden West Drive). The final staging area, Field’s Landing, contains four areas suitable for staging within a larger 13-acre surveyed area, ranging in size between 1.0 and 2.5 acres, the exact use of which will depend on availability at the time of construction. In addition to staging, Fields Landing will be used as a primary laydown yard for construction materials that will be taken directly to a work location or to a staging area closer to a work location. All of these staging areas are preliminary and subject to change depending on conditions on the ground at the time of construction, CPUC requirements, regulatory constraints, property owner issues, and other factors.

Please note, the revised labelling on Figure 2.8-1 (Attachment A) correctly shows the location of the engineered direct embedded pole to be installed on the east side of Campton Road, consistent with the location described in Section 2.6.2.4 of the PEA. Figure 2.8-1 as previously submitted depicted this pole at a different location.

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.

PG&E Response: Access roads will be approximately 16 feet wide. The length of each access road is in the updated GIS data. As indicated, the lengths of access roads vary between approximately 18 and 2,730 feet.

3.7.1.4 Helicopter Access

3. Identify which poles are proposed for removal or installation using a helicopter.

PG&E Response: As described in Sections 2.8.1.2 and 2.8.5.4 of the PEA, in locations where pole sites are not accessible by ground equipment, new poles will be installed or existing poles will be modified by a combination of helicopter and ground crews. The exact poles to be removed or installed by helicopter will be determined based on final design and the ground conditions at the time of construction. PG&E currently plans to use a helicopter to:

- Install the first three towers east of Humboldt Bay Substation;
 - Top poles T1, T2, T3, T4, T5, T6, T7;
 - Remove poles R1, R2, R3, R4, R7, R8, R9, R10, R13, R14; and
 - Replace or reframe poles 24, 25, 29, 31, 50, 56, 57, 66, 67, 73, 75, 103, 104, 106, and 107.
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.

PG&E Response: As indicated in Section 2.8.1.4, page 2.0-18 of the PEA, the project proposes to use the 11 staging areas listed on page 2.0-17 as helicopter landing zones, with the exception of the staging area at Redwood Acres Fairground. The revised labeling of the helicopter landing zones is reflected on the attached Figure 2.8-1 and accompanying GIS data. The exact size of each landing zone within the surveyed areas shown on Figure 2.8-1 will be determined at the time of construction. As discussed above under Question #1, landing zones will range in size, but on average are less than 1 acre and generally between 0.5 and 1.5 acres, with a couple of larger outliers.

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.

PG&E Response: Correct. With the exception of the staging area at Redwood Acres Fairgrounds (SA-9), all staging areas will be used as helicopter landing zones as indicated on the revised Figure 2.8-1.

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.

PG&E Response: The updated GIS accurately reflects pull and tension sites. There are 18 pull sites, some of which overlap with pole work areas, which is why there was a discrepancy in Figure 2.8-1 and the text in the PEA. Revised labeling on the attached Figure 2.8-1 and updated GIS data clarifies the pull site locations. The pull sites as numbered according to the closest pole location and identified on the revised Figure 2.8-1 are PS-1, PS-5, PS-6, PS-22, PS-35, PS-37, PS-43, PS-46, PS-54, PS-58, PS-64, PS-81, PS-87, PS-91, PS-105, PS-108, PS-111 and PS-115. The pull site numbers are shown on the revised Figure 2.8-1 and the updated GIS data.

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.

PG&E Response: As discussed in Chapter 3.4 Biological Resources and Chapter 3.18 Mandatory Findings of Significance and Cumulative Impact Analysis, no in-water work is proposed at any of the four waterways crossed by the project alignment. None of the waterways will be crossed by equipment, with the exception of Martin Slough, where there is an existing culvert.

- Buhne Slough is located between Humboldt Bay Substation and Hill Road. Work in this area will be performed by helicopter, apart from installation of the two TSPs immediately east of the substation, which will be outside of the open water of Buhne Slough.
- The Elk River is located between poles 12 and 13 in farmed agricultural wetland. The topography is flat, and the pole work areas are set back well outside of the Elk River and a minimum of 15 feet from the riparian vegetation associated with the Elk River.
- Martin Slough is located in the vicinity of Pole 30. PG&E will use an existing culvert to bring equipment across the slough to access Pole 30.
- Ryan Slough is located between poles 104 and 105. No work will be necessary in Ryan Slough. The nearest construction area will be a staging area within the flat pasture (approximately 65 feet east of Ryan Slough) that will be used as a helicopter LZ and pull site.

The topography at these locations is flat and, apart from Buhne Slough, the land use is agricultural. As described in the PEA in Chapter 2, p. 2.0-20 and Chapter 3.9 pp. 3.9-14 and 3.9-15 (Hydrology and Water Quality), and APM WQ-1, Best Management Practices (BMPs) will be installed in accordance with the Storm Water Pollution Prevention Plan (SWPPP) to avoid any indirect impacts to waterways along the alignment. These measures will take into account agricultural operations at the time of construction – e.g., installation of BMPs such as wattles or silt fence may not be needed in a flat, tilled, agricultural field, particularly if it will interfere with operation of farm equipment. BMPs may include measures such as installation of silt fence and wattles.

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.

PG&E Response: The proposed updated text for PEA Section 2.8.8 is underlined below.

2.8.8 Construction Workforce and Equipment

Each construction crew is expected to have between two and five workers. During the construction period, typically there will be two to five crews of approximately five people each, depending on specific activities being conducted. 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. Typically, construction will occur six days per week, (Monday through Saturday) and 10 hours per day, consistent with local noise ordinances unless safety or clearance needs dictate otherwise. During conductor installation and peaks in construction, additional crews may be brought to the project site. Nighttime construction is not planned, however may be required for clearances, or other safety or logistics concerns that would take place under very limited, short-term

circumstances. If nighttime construction becomes necessary (see responses to Questions 10 and 11 below) it could involve crews of two to five people and would be for a very short duration (see response to Question 9 below).

9. Describe the estimated frequency (number of days per year) and duration of nighttime construction.

PG&E Response: If nighttime work becomes necessary for logistics or safety concerns, it could be approximately two to six nights over the course of the eight-month construction timeframe, but it will depend on the circumstances and the safety issues that arise.

10. Describe circumstances when clearances would require nighttime construction.

PG&E Response: Nighttime work could become necessary if, for example, an unforeseen daytime clearance is needed on one of the other circuits in the area and both lines cannot be de-energized at the same time. See the response to Question #11 for additional circumstances in which nighttime construction may be required.

11. Describe and provide examples of “other safety or logistics concerns” that would require nighttime construction.

PG&E Response: See response to Question 10 above. Another example might be the close proximity of existing live lines within Humboldt Substation. A clearance might be needed on existing live lines within the substation that pose a safety concern when completing the connection of the replacement conductor. If daytime clearances are not possible on the line(s) posing the safety concern, a nighttime clearance may be required. Additionally, Caltrans may require that the installation and removal of guard structures at the crossing of U.S. Highway 101 be completed during periods of low traffic at night.

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.

PG&E Response: Helicopters are currently used periodically for approximately two hours every 24 months to perform visual inspections of the existing line as part of regular maintenance and, accordingly, is considered part of the environmental baseline. The reconductoring of the line will not result in any new use of helicopters during operations and maintenance of the line.

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

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.

PG&E Response: Vegetation mapping updates were performed in 2016 and 2018 based on habitat information recorded during field visits for the special-status plant survey and wetland delineation,

conducted in 2016 and 2018, respectively. As described in the PEA Chapter 3.4, page 3.4-8: “Vegetation mapping of the project area was completed in 2012 (AMEC 2012) and updated in 2016 and 2018 (Stillwater Sciences 2019a).” The reference to “Stillwater Sciences 2019a” in the Reference Section is to the Biological Resources Technical Report (BRTR), which was provided to the CPUC in a supplemental submittal on February 21, 2019. The BRTR states: “A previous vegetation map of the Project Area (AMEC 2012) was reviewed and modified in 2016 and 2018 to account for changes in the Project Area since 2012. Vegetation type composition was updated and refined; mapped vegetation type boundaries within the Project Area were revised as necessary.” (BRTR, p. 4.)

3.5 Cultural and Paleontological Resources

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

PG&E Response: The records search results were provided by PG&E’s cultural specialist to the CPUC’s cultural specialist, Robin Hoffman, on February 25, 2019.

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.

PG&E Response: These documents will be provided as soon as they become available closer to the start of construction.

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

PG&E Response: There is no existing Fire Risk Management Plan for the project. A Construction Fire Prevention Plan will be prepared closer to the start of construction in accordance with APM WF-3 identified in the new Wildfire Chapter provided with this submittal. An example from another project can be provided upon request.

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.

PG&E Response: An Excel file containing the APN number, mailing address and physical address of parcels within 300 feet of the Proposed Project was delivered to the CPUC February 21, 2019. The attached GIS parcel data (Attachment B) was downloaded from the Humboldt County website <https://humboldt.gov/276/GIS-Data-Download> on March 26, 2019.

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.

PG&E Response: Please see the proposed revisions to Section 3.16.3.1 of the PEA below to address the CPUC’s request. More recent Caltrans traffic data consisting of 2017 volume data and 2016 truck data is underlined in the text below.

U.S. Highway 101

U.S. Highway 101 is the primary freeway corridor in the region, linking cities on the northern California coast with San Francisco and other major cities. Access to and from U.S. Highway 101 in the vicinity of the project site includes the Herrick Avenue interchange and the King Salmon Avenue interchange for northbound traffic. U.S. Highway 101 carries approximately 33,500 vehicles per day for southbound traffic and 32,500 vehicles per day for northbound at the Herrick Avenue interchange, and approximately 26,400 vehicles per day for southbound traffic and 27,700 vehicles per day for northbound traffic at the King Salmon Avenue interchange (Caltrans 2017). Southbound traffic access from U.S. Highway 101 includes the Eureka Fourth/Myrtle Avenue interchange, which carries approximately 23,400 vehicles per day (Caltrans 2016). Truck traffic accounts for 7.46 percent of traffic south of Humboldt Bay Substation (Highway 101 at Loleta Drive), and 6.66 percent of traffic north of Humboldt Bay Substation (U.S. Highway 101 at the northern limit of the City of Eureka [Caltrans 2016]).

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*.

PG&E Response: Each crew is expected to have between two and five workers. If every worker used a vehicle, at peak construction this would result in a worst-case scenario for commuter traffic of 50 vehicles and 100 trips. U.S. Highway 101 will provide regional access routes for worker commutes and long-distance deliveries during construction. Compared to the 26,400 southbound and 27,700 northbound vehicles per day on U.S. Highway 101, construction vehicle traffic accessing the project area will result in a negligible increase in traffic. After regional access, the crews, each typically consisting of three vehicles, will use local roads to access staging areas and pole locations spread along the alignment. Once the crews travel out to their respective work locations, they will typically work at that one location for the day and then return to the yard. The most recent traffic count in the City of Eureka was performed in 1997. The closest traffic count to the project is on H Street, north of Oak Street (in the vicinity of Pole 63), which had a count of 5,130 cars per day. Using the City of Eureka’s rule of thumb growth rate of 1.4 percent, the traffic count for 2019 is an estimated 6,966 vehicles, and construction vehicles will result in a temporary and negligible increase in traffic.

For more information see: City of Eureka. Traffic Counts.

https://www.ci.eureka.ca.gov/depts/pw/engineering/traffic_signals/traffic_counts.asp Site accessed March 25, 2019.

3.17 Utilities and Services Systems

20. Provide state and local regulations regarding water, stormwater, wastewater, and solid waste in the Regulatory Background section.

PG&E Response: For state and local regulations surrounding water, stormwater, and wastewater, please refer to sections 3.9.2.1 (Hydrology) of the PEA.

Regulations regarding solid waste are as follows:

State

California Integrated Waste Management Act

The Integrated Waste Management Act was enacted in 1989 as Assembly Bill (AB) 939 and codified in Public Resources Code Section 40050 et seq. The Act required cities and unincorporated portions of counties throughout California to divert a minimum of 25 percent of solid waste from landfills by 1995 and 50 percent by 2000. Diversion includes waste prevention, reuse, and recycling. The Act resulted in the creation of the California Integrated Waste Management Board, which now is known as CalRecycle. Under the Act, local jurisdictions have to submit solid waste planning documentation to CalRecycle. The Act also set into place a comprehensive statewide system of permitting, inspections, and maintenance for solid waste facilities, and authorized local jurisdictions to impose fees based on the types and amounts of waste generated.

22 California Code of Regulations Division 4.5

Title 22 of the California Code of Regulations discusses an array of requirements with respect to the disposal and recycling of hazardous and universal wastes. Specific standards and requirements are included for the identification, collection, transport, disposal, and recycling of hazardous wastes. Additional standards are included for the collection, transport, disposal, and recycling of universal wastes, where universal wastes are defined as those wastes identified in Section 66273.9 of Title 22 of the California Code of Regulations, including batteries, electronic devices, mercury containing equipment, lamps, cathode ray tubes, and aerosol cans. Requirements include recycling, recovery, returning spent items to the manufacturer, or disposal at an appropriately permitted facility. Division 4.5 of Title 22 also provides restrictions and standards relevant to waste destination facilities, and provides authorization requirements for various waste handlers. Note that Title 22 includes California's Universal Waste Rule, as well as other additional waste handling and disposal requirements.

Local

Because the California Public Utilities Commission has exclusive jurisdiction over the siting, design, and construction of the project, the project is not subject to local discretionary regulations. The following summary of the local statutes and regulations relating to solid waste is provided for informational purposes and to assist with CEQA review.

Humboldt Waste Management Authority Strategic Plan

Humboldt Waste Management Strategic Plan (HWMSP) was prepared in accordance with the Integrated Waste Management Act, described above, to demonstrate the County's compliance with the Act's solid waste planning requirements. The Summary Plan element of the HWMSP contains goals and policies, as well as a summary of integrated waste management issues faced by Humboldt County, its cities, and unincorporated areas. It summarizes the steps needed to meet and maintain the 58 percent landfill diversion rate for the unincorporated area (8 percent above the state mandates rate of 50 percent) and to achieve the state-reported diversion rate of 75 percent and a 15,000-ton reduction in landfill materials by 2020.

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).

PG&E Response: As indicated in the PEA, Chapter 3.17 Utilities and Service Systems, p. 3.17-6, wastewater generated by the project will be limited to the use of portable toilets, which will be emptied by the sanitation company providing the service. Water needs for the project will be supplied by a water truck with a capacity of approximately 4,000 gallons. The water truck will typically be filled once a week, which equates to a conservative estimate of approximately 128,000 gallons over the anticipated construction period of approximately 8 months. There will be no long-term water needs generated by the project. Solid waste generated by the project will be collected in dumpsters designated for recyclable or non-recyclable waste. It is estimated that the equivalent of one 40-CY dumpster will need to be emptied approximately twice a month, which equates to approximately 640 CY over the anticipated 8-month timeframe of the project. This estimate assumes that dumpsters would be filled twice a month for 8 full months, which is a conservative estimate.

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.

PG&E Response: The California Green Building Standards Code, otherwise known as the CalGreen Code, is part of the California Building Standards Code (Building Code) and applies to "the planning, design, operation, construction, use and occupancy of . . . newly constructed buildings or structures" (see 24 California Code of Regulations 101.3), and does not apply to the replacement of poles along an existing utility corridor. The proposed project does not include any buildings or structures and will not require a building permit. Accordingly, the 65% requirement does not apply to this project.

That said, PG&E will make every effort to reduce waste during all construction and to recycle, whenever feasible. The approximately 104 wood poles to be removed will be disposed of in a landfill as the treated wood poles cannot be recycled. The LDS poles to be removed will be recycled, along with the removed conductor. PG&E will maintain four types of dumpsters: 1) for wood poles that cannot be recycled; 2) for trash that cannot be recycled; 3) for metal recyclables, including removed steel poles and conductor, and 4) for all other types of recyclables such as wood and plastic insulator packaging and construction worker recyclable garbage (e.g. bottles).

As indicated in the response to Question 21, it is estimated that the equivalent of one 40-CY dumpster will be emptied approximately twice a month.

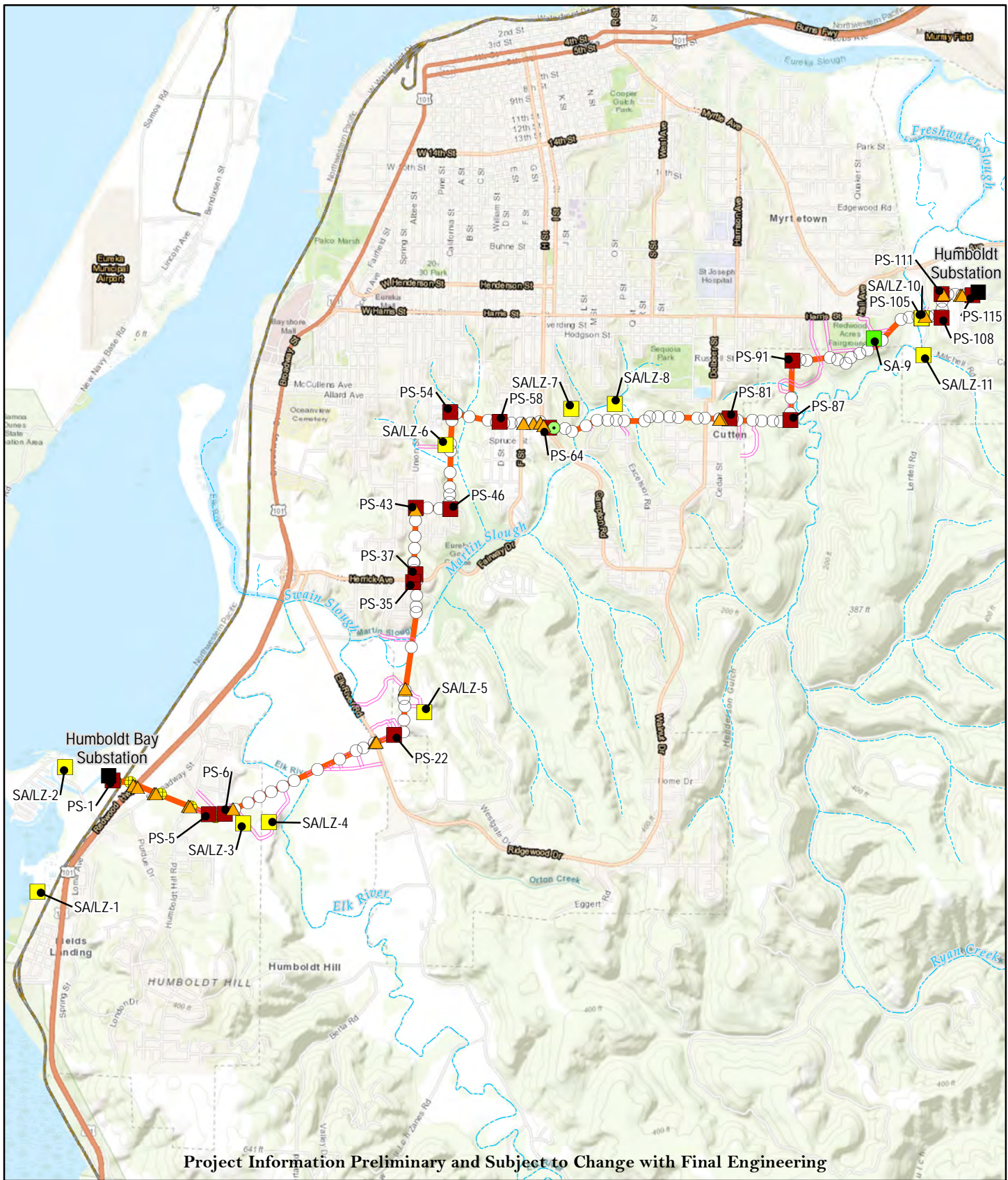
Chapter 6: Detailed Discussion of Significant Impacts (PEA Chapter 3)

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."

PG&E Response: The project addresses maintenance needs on an existing power line and will not facilitate future growth. Population growth is not driven by the availability of power, and the project is not in response to planned or forecasted population growth. While the project will improve the reliability of electric service for Humboldt County, the project will not extend new power lines or other infrastructure into areas not already served, and the project does not facilitate growth that

has not already been accounted for in long-range planning documents. New development will not be generated by the project.

ATTACHMENT A
Revised Figure 2.8-1



Project Information Preliminary and Subject to Change with Final Engineering

\\napaenvfile01\gis\1-PROJECTS\IPG&E\301602-Humboldt_PEA\4-MXD\Figure 2. 8-1 Preliminary Work Areas and Access Roads.mxd

3/21/2019

- Substations
- Humboldt Bay-Humboldt #1 60 kV Power Line (Proposed Project)
- Replace Pole
- ⊕ New Lattice Tower
- New TSP
- Replace Pole 65 with Engineered Direct Embedded Pole
- Staging Area Only (SA)
- Staging Area and Helicopter Landing Zone (SAILZ)
- Pull Site (PS)
- ▲ Guard Structures
- Access Routes

FIGURE 2.8-1
 Preliminary Work Areas and Access Roads
 Humboldt Bay-Humboldt #1 60 kV
 Reconductoring Project

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ATTACHMENT B
Publicly Available GIS Data for Parcels Within 300 Feet
(Separate File)

3.19 ENERGY

3.19.1 INTRODUCTION

This section describes existing conditions and potential impacts on energy as a result of construction, operation, and maintenance of the project, and concludes that a less than significant will occur. The proposed project's potential effects on energy were evaluated using the significance criteria set forth in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The conclusions are summarized in Table 3.19-1 and discussed in more detail in Section 3.19.4.

Table 19-1: CEQA Checklist for Energy

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local energy plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.19.2 REGULATORY BACKGROUND AND METHODOLOGY

3.19.2.1 Regulatory Background

Federal

Energy Policy Act of 2005

The Energy Policy Act created energy-related tax incentives from 2005 to 2016 to promote energy efficiency and conservation, renewable energy, oil and gas production and transmission, coal production, and electric generation and transmission.

American Recovery Reinvestment Act of 2009

As part of a larger stimulus package, the Recovery Act authorized federal funding to the U.S Department of Energy to forward specific energy priorities, including modernizing the nation's electric transmission grid.

State

Renewable Portfolio Standard Program

Established in 2002, California's Renewable Portfolio Standard aims to ensure that a minimum amount of renewable energy is included in the state's portfolio of electric generation resources. In 2015, SB 350 increased California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030 to enhance the state's ability to meet its long-term climate goal of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. The California Public Utilities Commission (CPUC) is working with the California State Energy Resources

Conservation and Development Commission (CEC) to help implement SB 350 by setting guidelines for large publicly-owned utilities to ensure that the goals of SB 350 are met. In September 2018, SB 100 was signed into law, which accelerated California’s renewable electricity procurement goals to 50 percent by 2026 and 60 percent by 2030. The law further directed the CPUC, CEC, and State Air Resources Board to plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by 2045. The law notes that new and modified electric transmission facilities may be necessary to facilitate the state achieving its renewables portfolio standard targets.

Renewable Energy Transmission Initiative

The Renewable Energy Transmission Initiative 2.0 is a statewide, non-regulatory planning effort convened by the California Natural Resources Agency, with participation from the CEC, CPUC, California Independent System Operator, and the U.S. Bureau of Land Management California Office. The RETI 2.0 initiative was created to explore the renewable generation potential available to California utilities to help meet state-wide greenhouse gas (GHG) reduction and renewable energy goals, and to identify the potential transmission implications of accessing and integrating these resources.

California 2008 Energy Action Plan Update

Originally developed in 2003 and updated in 2005 and 2008, the California Energy Action Plan identifies specific action areas to ensure that California’s energy resources are adequate, affordable, technologically advanced, and environmentally sound. The plan’s first-priority actions to address California’s increasing energy demands are energy efficiency and demand response (i.e., reduction of customer energy usage during peak periods to address system reliability and support the best use of energy infrastructure). Additional priorities include the use of renewable sources of power and distributed generation. The plan also notes that investment in conventional transmission infrastructure is crucial to helping the state meet its renewable energy goals.

Local

Because the CPUC has exclusive jurisdiction over the siting, design, and construction of the project, the project is not subject to local discretionary regulations. The following summary of local plans relating to renewable energy or energy efficiency is provided for informational purposes and to assist with CEQA review.

Redwood Coast Energy Authority

The Redwood Coast Energy Authority (RCEA) is a local government Joint Powers Agency founded in 2003 whose members include Humboldt County, and the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad, and the Humboldt Bay Municipal Water District. The RCEA develops and implements sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient and renewable resources. An element of RCEA’s Comprehensive Action Plan for Energy includes developing a strategic action plan for Humboldt County to meet 75 to 100 percent of its local electricity demand through local renewable energy resources.

Regional Climate Action Plan

The Regional Climate Action Plan (CAP) is a collaborative effort established in early 2019 between Humboldt County, RCEA, and the cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell and Trinidad to explore locally orientated strategies to reduce emissions from vehicle travel, livestock, electricity consumption, and other sources of GHGs. The members of the CAP will inventory emissions, set GHG reduction targets, and develop policies to reach the target.

City of Eureka Climate Action Plan and Draft Greenhouse Gas Reduction Measures

The City of Eureka has developed draft policy objectives, strategies, and programs to address GHG emissions and climate change. These draft policies include improving energy efficiency, increasing renewable energy, reducing transportation emissions through vehicle and fuel strategies, reducing vehicle miles traveled through land use strategies, reducing vehicle miles traveled through public transit, transportation demand management, and active transportation strategies, reducing solid waste sent to landfill, water conservation, and supporting local business and agriculture.

3.19.2.2 Methodology

Official local and state websites were reviewed for regulatory background information and information on existing energy providers and resources in Humboldt County and the City of Eureka.

3.19.3 ENVIRONMENTAL SETTING

3.19.3.1 Electricity and Natural Gas

PG&E and RCEA provide electrical power to the City of Eureka and Humboldt County. Approximately half the electricity serving Humboldt County is generated at the 163-megawatt natural gas-fired Humboldt Bay Generating Station (HBGS). Local biomass resources, primarily derived from lumber mill wood residue, provide approximately 25 to 30 percent of the County's electricity needs (Humboldt County 2017b).

Humboldt County imports approximately 90 percent of the natural gas used in the County, while approximately 10 percent is produced from fields in the Eel River Valley south of Eureka. Approximately half of the natural gas used in Humboldt County is used at the HBGS to generate electricity. Natural gas and electricity demand over the next 20 years are expected to increase from 0.5 percent per year to 2.5 percent per year (Humboldt County 2017b).

3.19.4 APPLICANT-PROPOSED MEASURES AND POTENTIAL IMPACTS

The following sections describe significance criteria for utilities and service systems impacts derived from Appendix G of the CEQA Guidelines, provide Applicant-Proposed Measures (APMs), and assess potential project-related construction and operational impacts on utilities and service systems.

3.19.4.1 Significance Criteria

According to Section 15002(g) of the CEQA Guidelines, “a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.” As stated in Section 15064(b) of the CEQA Guidelines, the significance of an activity may vary with the setting. Per Appendix G of the CEQA Guidelines, the potential significance of project impacts on energy was evaluated for each of the criteria listed in Table 3.19-1, as discussed in Section 3.19.4.3.

3.19.4.2 Applicant-Proposed Measures

No APMs are included because project construction, operation, and maintenance will have no impact on energy.

3.19.4.3 Potential Impacts

Project impacts on energy consumption and state and local planning were evaluated against the CEQA significance criteria as discussed below. This section evaluates potential project impacts from both the construction phase and the operation and maintenance phase.

As described in Chapter 2.0, Project Description, the proposed project includes replacing the existing overhead conductor and poles on approximately 7.8 miles of the existing single-circuit 60 kV power line between Humboldt Bay Substation and Humboldt Substation. As part of the project, approximately 0.6 mile of the adjacent Humboldt Bay–Eureka 60 kV Power Line immediately east of Humboldt Bay Substation will be moved onto four new lattice steel towers shared with the Humboldt Bay-Humboldt #1 60 kV Power Line. The project will reduce the frequency of outages and necessary maintenance and address an existing curtailment issue to reinforce the existing power line system. The operation and maintenance activities required for the reconducted power line will not change from those currently required for the existing power line; thus, no operation-related impacts will occur. Therefore, the impact analysis is focused only on construction activities that are required to install the new conductor and replace existing structures, and establish required access and work areas, as described in Chapter 2, Project Description.

a) Would the project result in potentially significant environmental impact due to wasteful inefficient, or unnecessary consumption of energy resources, during project construction or operation? *Less-than-Significant Impact*

The reconducted power line will serve the same purpose in the regional transmission system as the existing line and will not change the location or intensity of energy consumption. Construction of the project will require consumption of fuel to run construction vehicles, equipment, and helicopters. However, project pole replacement and power line reconductoring will be short-term and temporary with construction work locations moving along the existing power line alignment. PG&E’s engineering and construction management staff have developed an efficient construction plan and sequence, which minimizes vehicle trips and avoids wasteful, inefficient, or unnecessary consumption of energy. Implementation of APM GHG-1, which

minimizes unnecessary construction vehicle idling time, will further reduce energy consumption. Therefore, impacts will be less-than-significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? *No Impact*

Construction of the project will involve minor, temporary use of construction equipment to reconductor existing power line in order to maintain transmission system reliability. The project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.19.5 REFERENCES

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3.8 WILDFIRES

3.8.1 INTRODUCTION

This section describes existing conditions and potential impacts related to wildfires associated with construction and operation and maintenance (O&M) of the project. This analysis concludes that impacts with regards to wildfires will be less than significant. The project's potential effects associated with wildfires were evaluated using the significance criteria set forth in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The conclusions are summarized in Table 3.8-1 and discussed in more detail in Section 3.8.4, Applicant-Proposed Measures and Potential Impacts.

Table 3.8-1: CEQA Checklist for Wildfires

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.8.2 REGULATORY BACKGROUND AND METHODOLOGY

3.8.2.1 Regulatory Background

The following subsections contain an overview of regulations related to wildfires and related hazards.

Federal

No federal regulations regarding wildfires apply to this project.

State

California Department of Forestry and Fire Protection (CAL FIRE)

Pursuant to Public Resources Code (PRC) Sections 4201-4204 and Government (Gov't) Code Sections 51175-89, the California Department of Forestry and Fire Protection (CAL FIRE) has created Fire Hazard Severity Zone (FHSZ) maps for the state that identify areas that are within state or local responsibility for preventing or suppressing fires. These maps identify areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. The FHSZ zones then define the application of various mitigation strategies to reduce risks associated with wildland fires. State Responsibility Areas (SRAs) are areas of the state in which the financial responsibility of preventing and suppressing fires has been determined to be primarily the responsibility of the state (PRC Section 4201). Local Responsibility Areas (LRAs) are areas in which the financial responsibility of preventing and suppressing fires is primarily the responsibility of local agencies, including cities and counties (Gov't Code Sections 51175-51189). SRAs were originally mapped by CAL FIRE in 1985 and LRAs in 1996.

Within SRAs, the Director of CAL FIRE has designated areas as moderate, high and very high fire hazard severity zones. (PRC Section 4202.) Outside of SRAs – within LRAs – the Director of CAL FIRE was charged with recommending the locations of very high fire hazard severity zones (VHFHSZ). (Gov't Code Section 51178.) These recommendations were to be reviewed and adopted in ordinances by local agencies (Gov't Code Section 51179), although not all local agencies have complied. All designations are mapped on the CAL FIRE website.

California Public Resources Code (PRC)

PRC Sections 4290 to 4293 identify construction and O&M requirements to minimize fire hazards for structures located in SRAs, in which the financial responsibility of preventing and suppressing fires has been determined to be primarily the responsibility of the state. These PRC sections include the following:

PRC Section 4290 was adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development of all residential, commercial, and industrial buildings in SRAs. Under this section, all residential, commercial, and industrial building construction within SRAs must provide for basic emergency access and perimeter wildfire protection measures, as specified in the PRC. Local standards that exceed those of PRC 4290 supersede PRC 4290.

PRC Section 4291 addresses requirements for maintaining defensible space around buildings in SRAs.

PRC Section 4292 addresses power line hazard reduction. It identifies the requirements for firebreaks around “any pole or tower which supports a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner pole” in wildland areas.

PRC Section 4293 provides specific clearances for power lines in wildland areas.

Rules for Overhead Electric Lines

General Order (GO) 95 of the California Public Utilities Commission (CPUC) regulates all aspects of design, construction, and O&M of overhead electrical power lines and fire safety

hazards for utilities subject to its jurisdiction. GO 165 imposes inspection requirements for transmission and distribution lines, and GO 166 requires emergency response procedures to respond to electric system failures, major outages, or hazards posed by damage to electric utility facilities. Rule 11 enables electric utilities to suspend customer service when minimum vegetation clearance requirements are not met.

On February 5, 2014, the CPUC adopted its Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric Utility Facilities and Aerial Communications Facilities. (Decision 14-02-015.) In addition to updating various GO 95 requirements and ordering further study, the decision called for creation by the CPUC of a High Fire-Threat District (HFTD) map identifying zones of high hazard, elevated risk and extreme risk for destructive utility-associated wildfires. On December 21, 2017, the CPUC issued its Decision Adopting Regulations to Enhance Fire Safety in the High Fire Threat District, adding statewide HFTD map requirements to GO 95 and enhancing GO 95's fire safety regulations within HFTD areas. (Decision 17-12-024.) The decision also strengthened GO 165 and 166 requirements, and expanded Rule 11 concerning when utilities can disconnect service to customers who obstruct vegetation management activities.

In January 2018, the CPUC adopted its statewide HFTD Map. The HFTD Map designates three areas where there is an increased risk from wildfires: Tier 3 (extreme fire risk), Tier 2 (elevated fire risk), and Zone 1 (USFS and CAL FIRE Tree Mortality High Hazard Zone Tier One not included in Tier 3 or Tier 2). Tier 2 fire-threat areas depict areas where there is an elevated risk (including likelihood and potential impacts on people and property) from utility-associated wildfires. Tier 3 fire-threat areas depict areas where there is an extreme risk (including likelihood and potential impacts on people and property) from utility-associated wildfires (CPUC, 2018a). These CPUC designations do not replace CAL FIRE's fire hazard severity zones.

On October 25, 2018, the CPUC entered an Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018), R.18-10-007. The decision implemented SB 901's additions to Public Utilities Code Section 8386 requiring that PG&E and other utilities submit wildfire mitigation plans. PG&E submitted its Amended 2019 Wildfire Safety Plan on February 6, 2019, which "describes the enhanced, accelerated, and new programs that PG&E is and will aggressively continue to implement to prevent wildfires in 2019 and beyond."

Fire Prevention Standards for Electric Utilities

The Fire Prevention Standards for Electric Utilities (CCR Title 14, §§ 1250-1258) provide definitions, maps, specifications, and clearance standards for applying the requirements of PRC Sections 4292 - 4296 to projects in SRAs under the jurisdiction of CAL FIRE.

California Fire Code

The California Fire Code 2016 (CCR Title 24, Part 9) is based on the International Fire Code from the International Code Council and contains consensus standards related to establishing good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new or existing buildings, structures, and premises.

Hazardous Waste Control Law

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (CCR Title 27) was mandated by the State of California in 1993. The Unified Program has six elements, including the Uniform Fire Code Hazardous Materials Management Plans and Hazardous Materials Inventory Statements.

At the local level, this program is accomplished by identifying a Certified Unified Program Agency (CUPA) that coordinates all of these activities to streamline the process for local businesses. The Humboldt County Division of Environmental Health is approved by the Cal/EPA as the CUPA for Humboldt County.

Local

Because the CPUC has exclusive jurisdiction over the siting, design, and construction of the project, the project is not subject to local discretionary regulations. This section provides information on Humboldt County's local fire hazard mapping and emergency response policies for informational purposes and to assist with CEQA review.

Humboldt County General Plan 2017 Safety Element

The General Plan includes a Safety Element with goals and policies to reduce damage from wildland fires and establishes the following goal:

- S-G 4: Development designed to reduce the risk of structural and wildland fires supported by fire protection services that minimize the potential for loss of life, property, and natural resources.

The Safety Element includes mapping of the “High” and “Very High” Wildland Fire hazard zones as identified in the County's 2015 Operational Area Hazard Mitigation Plan and consistent with the areas designated by CAL FIRE's mapping. The Safety Element uses the hazard mitigation plan and existing data on wildland and urban fire hazards to guide new development and to help reduce damage from fire hazards.

Humboldt County General Plan Circulation Element

The Humboldt County General Plan Circulation Element, amended in 2017, contains goals and policies related to the safety on local roads:

C-G1: Circulation system safety and functionality. A safe, efficient, accessible and convenient circulation system in and between cities, communities, neighborhoods, hamlets, and adjoining regions taking into consideration the context-specific needs of all users, consistent with urban, suburban, rural, or remote community character.

C-P1(b): Designing access to residential areas to minimize disruptions to the flow of traffic while providing for user safety and connectivity on arterial or collector roads.

Humboldt County Office of Emergency Services

The Humboldt County Office of Emergency Management Services is responsible for the planning, coordination of response, recovery, and mitigation activities related to county-wide

emergencies and disasters. It serves as the primary coordination point for emergency management's communication flow between the federal, state, and local levels, and is responsible for developing emergency operation plans for the county, cities, and districts in Humboldt County, conducting training and educational outreach programs related to emergency preparedness, and sponsoring emergency management training.

Humboldt County Transportation Plan

The Humboldt County Association of Governments (HCAOG) approved the Humboldt Regional Transportation Plan 2040 in 2016. Among its long-term goals is the efficient and viable transportation system to reduce traffic congestion reduction on County roadways. The Plan notes that increase in safety for users can reduce transportation-related fatalities and serious injuries.

3.8.2.2 Methodology

The potential for activities and equipment to pose fire hazards was evaluated through review of the CAL FIRE and CPUC fire hazard maps and maps contained in the Safety Element of the Humboldt County General Plan. CPUC, PG&E, and Humboldt County fire hazard rules and policies were reviewed.

3.8.3 ENVIRONMENTAL SETTING

Humboldt County

The project corridor includes rural and urban coastal areas of Humboldt County and the City of Eureka with a range of uses from agriculture and timberlands to commercial, residential, and industrial.

The CAL FIRE High Fire Severity Zone (HFSZ) maps show portions of the project alignment are within a LRA and a SRA. A “very high fire hazard severity zone” is defined in Gov’t Code section 51177 (i) as an area identified by CAL FIRE that is not in a SRA and meets the criteria set out in section 51178. The Humboldt County HFSZ map indicates there are no “very high fire hazard severity zones” (VHFHSZs) within the project area (Figure 3.8-1). About half of the project alignment falls within areas that are not zoned for any fire hazard risk. The remaining half of the project alignment falls within an SRA classified as either a moderate fire hazard severity zone or a high fire hazard severity zone on the CAL FIRE HFSZ maps, as shown on Figure 3.8-1.

The entire project is located outside of any mapped fire hazard zones on the CPUC’s High Fire-Threat District (HFTD) map and outside of the CPUC’s Tier 2 fire-threat area, defined as an area where there is elevated risk from utility associated wildfire. A CPUC Tier 2 fire-threat area is located to the east of the project area, as indicated on Figure 3.8-1.

Fire protection services and equipment near the existing utility lines are discussed in detail in Section 3.14, Public Services. That discussion is incorporated herein by reference.

3.8.4 APPLICANT-PROPOSED MEASURES AND POTENTIAL IMPACTS

The following subsections describe significance criteria for impacts related to wildfires derived from Appendix G of the CEQA Guidelines, and assess potential project-related construction and operational impacts related to wildfires.

3.8.4.1 Significance Criteria

According to Section 15002(g) of the CEQA Guidelines, “a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.” As stated in Section 15064(b) of the CEQA Guidelines, the significance of an activity may vary with the setting. Per Appendix G of the CEQA Guidelines, the potential significance of project impacts related to wildfires was evaluated for each of the criteria listed in Table 3.8-1, as discussed in Section 3.8.4.3, Potential Impacts.

3.8.4.2 Applicant-Proposed Measures

PG&E will implement the following APMs:

APM WF-1: Smoking and Fire Rules

Smoking will not be permitted on site, except in barren areas that measures a minimum of 20 feet in diameter and are cleared to mineral soil. Under no circumstances will smoking be permitted during the fire season (approximately July through October) while employees are operating equipment, or while walking or working in grass and woodlands.

APM WF-2: Carry Emergency Fire Suppression Equipment

PG&E construction crew trucks and large equipment shall have, at a minimum, a standard round-point shovel and a fire extinguisher. If construction activities likely to cause sparks (e.g., welding, grinding, or grading in rocky terrain) are conducted, emergency fire tool boxes shall be readily available to crews. The emergency fire tool boxes shall contain fire-fighting items such as shovels, axes, and water,

APM WF-3: Construction Fire Prevention Plan

PG&E shall prepare a Construction Fire Prevention Plan consistent with the measures identified in APM HAZ-3, Fire Risk Management, that addresses procedures for fire prevention at active construction sites. The Construction Fire Prevention Plan shall include requirements for carrying emergency fire suppression equipment, conducting “tailgate meetings” that cover fire safety discussions, restricting smoking, idling vehicles, and restricting construction during red flag warnings. The Construction Fire Prevention Plan shall address the following fire risk reduction measures:

- Training and briefing all personnel working on the project in fire prevention and suppression methods.
- Conducting a fire prevention discussion at each morning’s safety meeting.
- Storage of prescribed fire tools and backpack pumps with water within 50 feet of work activities.

- Assigning personnel to conduct a “fire watch” or “fire patrol” to ensure that risk mitigation and fire preparedness measures are implemented, immediate detection of a fire, and to coordinate with emergency response personnel in the event of a fire.

The Construction Fire Prevention Plan will be submitted to the CPUC for review at least 30 days prior to construction.

3.8.4.3 Potential Impacts

Project impacts related to wildfires were evaluated against the CEQA significance criteria and are discussed in the following paragraphs. The impact analysis evaluates potential project impacts during the construction phase and the O&M phase.

As described in Chapter 2.0, Project Description, the proposed project includes replacing the existing overhead conductor and poles on approximately 7.8 miles of the existing single-circuit 60 kV power line between Humboldt Bay Substation and Humboldt Substation. As part of the project, approximately 0.6 mile of the adjacent Humboldt Bay–Eureka 60 kV Power Line immediately east of Humboldt Bay Substation will be moved onto four new lattice steel towers shared with the Humboldt Bay-Humboldt #1 60 kV Power Line. The project will reduce the frequency of outages and necessary maintenance and address an existing curtailment issue to reinforce the existing power line system. The operation and maintenance activities required for the reconducted power line will not change from those currently required for the existing power line; thus, no operation-related impacts will occur. Therefore, the impact analysis is focused only on construction activities that are required to install the new conductor and replace existing structures, and establish required access and work areas, as described in Chapter 2, Project Description. Long-term and continuing efforts to reduce wildfires generally within the electric utility system are also discussed.

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan? *Less-than-Significant Impact*

Portions of the project are within a SRA designated by CAL FIRE as areas of moderate and high fire risk under Public Resources Code sections 4201, *et seq.* None of the project is within an area classified as a very high fire hazard severity zone.

The CPUC’s High Fire-Threat District (HFTD) map adopted in January 2018 identifies zones of high hazard, elevated risk, and extreme risk for destructive utility-associated wildfires. None of the project is located within a CPUC Fire-Threat zone.

The project will not substantially impair an adopted emergency response plan or emergency evacuation. As indicated in Section 3.8.3 (g) of Section 3.8, Hazards and Hazardous Materials, the project will not conflict with an adopted emergency response plan or evacuation plan. As described in Section 3.16.4.3 (e) of Section 3.16, Transportation and Traffic, emergency access will not be directly impacted during construction because all streets will remain open to emergency vehicles at all times throughout construction. Although lane closures may be required, at least one lane will remain open to provide access for emergency vehicles. In addition, any lane closures will be temporary and short-term, and these closures will be coordinated with Caltrans and local jurisdictions to reduce the potential temporary and short-

term effects on emergency access. The project will not impair the implementation of or physically interfere with an adopted emergency response or evacuation plan; therefore, no impact will occur.

PG&E annually updates its own Company Emergency Response Plan (CERP), which is prepared and submitted to the CPUC in compliance with GO 166. The CERP includes PG&E's in-place plans and protocols for a coordinated response to emergencies. In 2018, the CERP added a Wildfire Safety Operations Center, staffed 24 hours a day, to detect, mitigate, communicate and respond to fire threat hazards throughout PG&E's service area. The project will not impair continued implementation of the CERP.

See also Section 3.8.4.2 of Section 3.8, Hazards and Hazardous Materials, identifying APM HAZ-1 concerning PG&E's standard Hazardous Substance Control and Emergency Response procedures that include methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during project construction.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project – due to slope, prevailing winds, and other factors – exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? *Less-than-Significant Impact*

As explained above, several portions of the project are in areas classified as being within a SRA that has been designated by CAL FIRE as an area of moderate to high risk. None of the project is located on lands classified as very high fire hazard severity zones as recommended by CAL FIRE, or within a Tier 2 (elevated risk) or Tier 3 (extreme fire risk) area on the CPUC's HFTD map.

The project will not exacerbate wildfire risks in or near the SRA or elsewhere due to slope, prevailing winds or other factors that would expose project occupants to wildfire pollutants or cause the uncontrolled spread of a wildfire. The existing power line passes through areas of long-term agricultural and residential use, urban forest associated with tributaries to Martin Slough, and forested lands toward the eastern end of the project. The primary risk for potential fire hazards for power line work will be associated with the use of vehicles and equipment during construction that could generate heat or sparks that could ignite dry vegetation and cause a fire. An additional but less likely hazard during construction and operation would be equipment failure, which could result in a fire.

During construction, PG&E will implement APM WF-1 limiting smoking and APM WF-2 requiring workers to carry emergency fire suppression equipment to reduce the wildland fire risk in the project area. In addition, WF-3 requires PG&E to implement a Construction Fire Prevention Plan during construction to minimize and avoid fire risk during construction. See also Section 3.8.3.4 (h), regarding risks from wildland fires. Impacts from construction will remain less than significant.

The project will result in the power line being less susceptible to fire risk as it replaces aging wood poles, conductor, and associated equipment, with new equipment less susceptible to breakage. Furthermore, approximately 35 existing wood poles will be replaced with LDS poles, which have a greater ability to withstand risks from wildfires.

PG&E will continue to implement fire risk management procedures during O&M of the reconductored power line, and no new impacts will occur. O&M activities on the power line will continue to include regular vegetation clearing to minimize the potential for fire. Vehicles will continue to use existing roads to access the power line during O&M, which will reduce the potential for vehicle heat to ignite dry vegetation and start fires.

PG&E will implement the provisions of PG&E's Amended 2019 Wildfire Safety Plan, filed February 6, 2019 in response to SB 901 and the CPUC's Order Initiating Rulemaking in R.18-10-007. The Plan describes PG&E's wildfire reduction programs and measures, including enhanced vegetation management, inspections, system hardening, real-time weather monitoring, enhanced SCADA and other controls, and the newly-initiated Public Safety Power Shutoff (PSPS) Program. The system hardening program, an ongoing, long-term capital investment program to rebuild portions of PG&E's overhead electric distribution system, calls for replacing bare overhead distribution conductors with covered conductors, select undergrounding of distribution where appropriate, replacing equipment with equipment identified by CAL FIRE as low fire risk, and upgrading or replacing transformers to operate with more fire-resistant fluids. For both distribution and transmission lines, the Plan calls for installing more-resilient steel poles to increase pole strength and fire resistance.

As additional protection from wildfires, PG&E's Wildfire Safety Operations Center will be staffed 24 hours a day to detect, mitigate, communicate and respond to fire threat hazards throughout PG&E's service area. Accordingly, potential impacts from construction will be less than significant.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? *No Impact*

As explained above, portions of the project are located in or near an SRA that is designated by CAL FIRE as an area of moderate to high risk.

The project will replace existing poles and conductors in an existing utility line corridor and will not require the installation or maintenance of new infrastructure. PG&E will continue to implement fire risk management procedures during O&M of the existing lines, including the enhanced wildfire reduction programs and measures described in PG&E's Amended 2019 Wildfire Safety Plan, and no new impacts will occur.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? *Less-than-Significant Impact*

As explained above, a portion of the project is located in or near an SRA that has been designated by CAL FIRE as an area of moderate to high risk.

The project will not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes due to wildfires. The project will replace poles and conductors on an existing utility line and will not change the drainage or topography. As indicated in Section 3.6.2 (c) of Geology and Soils, the project will not create new risks from landslides. As indicated in Section 3.9.4.3 (d), the project will include surface-disturbing activities that could temporarily alter existing drainage patterns in the project footprint; however, stormwater flowing on and off work areas will be managed in accordance with the project SWPPP, which will minimize potential for flooding from work areas during construction. Therefore, the impact will be less than significant.

3.8.5 REFERENCES

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