

# MINOR PROJECT REFINEMENT REQUEST FORM



## Part A: Request Description

### MPR Request

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**Request Number:** 06  
**Date Requested:** September 23, 2022  
**Proposed Duration/  
Timing of Use:** Upon approval through October 31st, 2022  
Daytime hours  
**Location:** Access route and work area at Pole 56  
APN: 018-261-008-000  
**Attached Map?**  Yes  No

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### Proposed Action(s)

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PG&E proposes to utilize an overland access route and expand the Pole 56 work area from 20 ft. x 20 ft. to approximately 75 ft. x 75 ft. The pole is located in a wetland adjacent to a private residential driveway in the City of Eureka (APN: 018-261-008-000). The proposed access route and work area are located within the study area of the Final IS/MND.

The access route would utilize an existing overland route that extends approximately 275 feet from the end of a paved driveway. The route was established by the landowner and crosses through seasonally flooded wetland habitat. The route spans an inundated finger of Martin Slough via a culverted crossing. The overland route would be used by a tracked excavator and rubber-tracked bucket truck required for pole excavation, culvert sleeve installation, and installation the new pole. Because the pole would be installed with ground-based line equipment instead of a helicopter, the work area would need to be expanded to accommodate ground-based equipment.

Existing paved roads through a residential neighborhood would provide ground access to the new access route and work area. No grading would occur, and all disturbance from access and construction would be temporary. The expanded pole work area would be restored consistent with the project Habitat Restoration Plan and SWPPP.

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### Purpose(s)

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Preliminary project design and engineering identified Pole 56 as a helicopter set pole that could be excavated with light equipment flown to the pole site (i.e., ATV supported by hand-digging). However, subsequent field evaluations have determined that the pole is unsafe for a helicopter set or to climb due to the out of standard leaning condition and the distribution underbuild of the pole. In addition, PG&E has determined that a culvert sleeve is needed to stabilize the excavated hole which requires larger excavation equipment to install. For these reasons, overland access would be required for equipment access and the work area footprint expanded to accommodate ground-based equipment. The size of the work area and the equipment utilized for the pole replacement would be minimized to the extent possible while ensuring constructability and safety.

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### Part B: Existing Conditions

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**Existing Land Uses:** Low density residential

**Surrounding Land Uses:** Low density residential

**Sensitive Receptors within 500 feet:** Private residence

**Environmental Resources within 500 feet:** The pole work area and overland access route are within seasonally flooded forested and scrub-shrub wetlands. No special status species, critical habitat, or rare plants were identified within the proposed access route or pole work area.

Mitigation considerations are discussed below in Part E.

**Has landowner approval been granted?**  Yes  No  N/A

**Landowner:** APN:

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### Surveys

*List any new survey reports under Part D, attach a copy, and describe relevant survey details under the applicable resource category listed in the Part E.*

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**Biological Resources. Were all sites associated with the proposed action(s) surveyed for biological resources with the potential to occur in the area? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season to detect resources? If not, describe under the applicable resource category in Part E.**

The proposed pole work area and access route are located within the biological resources study area included in the Final IS/MND. No special status species, critical habitat, or rare plants were identified within the access route boundary or pole work area. The vegetation in the work area is composed primarily of coastal willow, small-fruited bullrush, red alder, and water parsley.

**Cultural Resources. Were all sites associated with the proposed action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?**

The access route and pole work area are located within the previously surveyed project area for the IS/MND and no cultural resources were identified in the vicinity of the access route or pole work area.

**Jurisdictional Waters. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?**

The proposed pole work area and access route are within areas previously surveyed for jurisdictional waters. Both the access route and pole work area are within seasonally flooded forested and scrub-shrub wetlands. The access route crosses a culverted channel of Martin Slough (approximately 10 ft in width). Mapped jurisdictional waters are shown on Figure 1.

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## Part C: Permits, Agency Approvals, and Environmental Protection Measures

List any new permits or agency approvals under Part D, attach a copy, and describe relevant details under the applicable resource category listed in Part E.

**Have all required permits, permit amendments/authorizations, or agency approvals been issued by resource agencies with applicable jurisdiction? Describe if necessary.**

Yes

**Would the proposed action(s) conflict with permit conditions or agency approvals? Describe if necessary.**

No

**Would the proposed action(s) conflict with project applicant proposed measures or mitigation measures listed in Final Initial Study/Mitigated Negative Declaration (IS/MND)? Describe if necessary.**

No

## Part D: Attached Materials

List any attached materials (e.g. surveys, maps, photos, memos, agency authorizations, etc.) below. Materials should be attached to the end of this form.

Attached:

MPR Figure 1 – Pole 56 Access Route

## Part E: Final IS/MND Consistency Summary

Complete the Final IS/MND Consistency Summary below and answer the consistency questions for each resource category. Include a description and justification below each resource category as necessary. The consistency questions were developed using the CEQA Checklist provided in the Final IS/MND. Refer to the Final IS/MND for the details on the project impact evaluation.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact on:	No Change	Potentially Significant Change	N/A
<b>Aesthetics (e.g., damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)?</b> <i>Final IS/MND evaluation: Less than Significant</i> Approved work is already occurring in the area; therefore, the access route and expanded work area would not result in any impacts to aesthetics that have not already been discussed in the IS/MND; however, as described in the IS/MND, temporary work areas and staging areas will be restored in coordination with landowners, and in compliance with applicable resource agency permits, to re-establish pre-project conditions. The new temporary access route and work area will be restored consistent with the Habitat Restoration Plan and SWPPP. With the implementation of APM AE-2 and APM AE-4, the site will be designed to minimize visual impacts and will be allowed to return to its natural state after use; therefore, the refinement would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)?</b> <i>Final IS/MND evaluation: No Impact</i> There are no agricultural or forestry lands in the project area.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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**Air Quality (e.g. produce additional emissions, or expose sensitive receptors to additional pollutants)?**

*Final IS/MND evaluation: Less than Significant*

Use of the proposed access route and work area could result in the creation of fugitive dust during construction. APM AQ-1 would ensure that impacts from fugitive dust would be minimized and impacts to air quality would remain less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

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**Biological Resources (e.g., cause an adverse effect to sensitive or special-status species, or impact riparian, wetland, or any other sensitive habitat, or conflict with local policies or ordinances protecting biological resources)?**

*Final IS/MND evaluation: Less than Significant*

The proposed access route and pole work area are located within area mapped as seasonally flooded forested and scrub-shrub wetlands. The change from helicopter to ground-based construction would require an expanded work area and overland travel along a route previously established by the landowner. The Pole 56 work area dimensions would increase from approximately 20 ft. x 20 ft. to approximately 75 ft. x 75 ft. to provide safe operating space for the excavator and bucket truck during pole installation. The expanded pole work area dimensions are consistent with ground-based pole work areas described in the IS/MND. In accordance with APM-09, the pole work area would be matted within wetlands if work occurs during wet conditions. Approximately 100 square feet of vegetation removal would be required for excavation of the pole; this would occur for both helicopter and land-based construction. The vegetation in the work area is composed primarily of coastal willow, small-fruited bullrush, red alder, and water parsley. Impacts to wetlands from pole installation would not involve grading but involve minor surface disturbance from operating and staging equipment. These impacts would be temporary, would be expected to passively restore, and would be subject to MM BIO-2 which requires habitat restoration and monitoring. No special status species, critical habitat, or rare plants were identified within the proposed expanded work area.

The proposed access route would extend approximately 275 feet along an existing overland route parallel to the power line from the end of a paved residential driveway. The route has been established by the landowner so no improvements or vegetation clearing would be required. The access route crosses a culverted channel of Martin Slough (approximately 10 ft in width). The culvert and crossing would be protected with a steel plate sufficient to support the weight of planned equipment. In accordance with APM-09, the overland route area would be matted within wetlands if work occurs during wet conditions. No additional grading or vegetation clearing would be required, and no special status species, critical habitat, or rare plants were identified within the proposed overland route.

APMs and Mitigation Measures (MMs) from the Final IS/MND would apply to work at this location and would ensure that impacts on biological resources are less than significant. The following APMs would apply to the refinement: APM BIO-1 requires implementation of the Worker Environmental Awareness Program; APM BIO-2 requires general resource protection measures, including all refueling and maintenance of vehicles will be restricted to designated staging areas located at least 100 feet from any down-gradient aquatic habitat, unless otherwise isolated from habitat by secondary containment; APM BIO-3 requires preconstruction survey(s) for special-status species and sensitive biological resources areas; APM BIO-4 requires the identification and marking of sensitive biological resource areas; APM BIO-5 requires a biological monitor on-site during construction activities in sensitive biological resource areas; APM BIO-6 requires nesting bird avoidance and protection; APM BIO-7 requires special-status plant avoidance and protection; APM BIO-8 requires special-status amphibian and reptile avoidance and protection; APM-BIO-9 requires travel within dry conditions or matting or other protection measures when this is not feasible; and MM BIO-2 would be required to provide for habitat restoration and monitoring.. Any disturbed areas along the access route will be restored consistent with the Habitat Restoration Plan and Project SWPPP after use. With implementation of APMs and MMs from the Final IS/MND and BMPs contained in the Project SWPPP, the proposed access route and expanded work area would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

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**Cultural and Tribal Cultural Resources (e.g., cause adverse change to a historical, archeological, or tribal cultural resource)?**

*Final IS/MND evaluation: Less than Significant*

No known cultural or paleontological resources are located at the site. While there is a possibility of inadvertent discovery of buried remains during implementation of the project, implementation of APM CUL-1, APM CUL-3, APM CUL-4, APM PALO-1, and APM PALEO-2, would reduce the potential for damage or destruction to archaeological and paleontological resources, and the proposed access route would not result in a new impact or increase the severity of a previously analyzed impact on cultural or tribal resources.

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**Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)?**

*Final IS/MND evaluation: Less than Significant*

With implementation of APM GEO-1 and APM GEO-2, construction in soft or loose soils will be minimized and slope instability will be reduced. Additionally, APM WQ-1 would require development and implementation of the Project SWPPP to minimize construction impacts on surface water and groundwater quality. The pole work area would be restored consistent with the Habitat Restoration Plan and Project SWPPP and would not result in a new impact or increase the severity of a previously analyzed impact on geology and soils.

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**Greenhouse Gas Emissions (e.g., generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment)?**

*Final IS/MND evaluation: Less than Significant*

The proposed access route and work area would not result in an increase in the level of equipment use and run time of equipment and would be consistent with the estimates provided in the IS/MND. Use of ground-based equipment instead of a heavy-lift helicopter would likely reduce the level of greenhouse gas emissions for this construction activity. APM GHG-1 would ensure that any impacts from emissions would remain less than significant. The access route would not result in a new impact or increase the severity of a previously analyzed impact on greenhouse gas emissions.

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**Hazards and Hazardous Materials (e.g., create or increase the exposure of people or structures to hazardous materials or wildland fires, involve the use of additional hazardous materials or equipment, or interfere with an adopted emergency plan)?**

*Final IS/MND evaluation: Less than Significant*

Hazardous materials (such as fuels and oils) may be stored, handled, or used in the access route or work area, and would be consistent with the types of materials analyzed in the IS/MND. The proposed access route does not contain any known hazardous material sites. The routine use of hazardous materials could result in an accidental spill, which could pose a significant impact to the public; however, APM HAZ-1 and APM HAZ-2 and APM HAZ-3 would ensure that impacts from hazards and hazardous materials are less than significant. The proposed access route would not result in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

Additionally, APM BIO-2 requires general resource protection measures, including all refueling and maintenance of vehicles will be restricted to designated staging areas located at least 100 feet from any down-gradient aquatic habitat, unless otherwise isolated from habitat by secondary containment. The proposed access route and work area would not result in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

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**Hydrology and Water Quality (e.g., degrade water quality, discharge waste or sediment, deplete groundwater, alter the existing drainage pattern, create additional runoff water or polluted runoff, place structures in a 100-year flood hazard**

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**area, or expose people or structures to a significant risk involving flooding)?**

*Final IS/MND evaluation: Less than Significant*

Wetlands and water features are located along and adjacent to the access route and work area. The access route crosses a culverted channel of Martin Slough (approximately 10 ft in width). The culvert and crossing would be protected with a steel plate sufficient to support the weight of planned equipment. Implementation of APM WQ-1 and APM WQ-2 would ensure that any impacts to water quality would remain less than significant. The Project SWPPP will be updated to include the new access route and updated SWPPP drawings will be provided to the CPUC. The proposed access route and work area would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

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**Land Use (e.g., conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)?**

*Final IS/MND evaluation: No Impact*

The proposed access route and work area would be temporary and would not result in a new impact or increase the severity of a previously analyzed impact on land use and planning.

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**Mineral Resources (e.g., result in the loss of availability of a known mineral resources that would be of value to the region and the residents of the State or result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan)?**

*Final IS/MND evaluation: No Impact*

The proposed access route and work area are not located in a mineral resource area, no significant mineral deposits are present, and would not result in a new impact or increase the severity of a previously analyzed impact on mineral resources.

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**Noise (e.g., expose sensitive receptors to additional noise or vibration)?**

*Final IS/MND evaluation: Less than Significant*

Activities associated with the proposed access route and work area expansion are consistent with those discussed in the Final IS/MND. As the access route is adjacent to a residence in a low-density residential area, noise-reducing construction practices specified in APM NOI-1 would be implemented during construction activities. APM NOI-2 would notify residents of nighttime construction if required. Both APMs will be implemented to reduce impacts to noise sensitive receptors. Use of ground-based equipment instead of a helicopter would reduce the level of construction-related noise in the vicinity of sensitive receptors, specifically residences. The proposed access route would not result in a new impact or increase the severity of a previously analyzed impact on noise.

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**Population and Housing (e.g., induce substantial population growth in an area, or displace substantial numbers of people or housing)?**

*Final IS/MND evaluation: No Impact*

The proposed access route and work area would not result in any impacts to population and housing, and would be consistent with the analysis of the IS/MND. The proposed access route and work area would not result in a new impact or increase the severity of a previously analyzed impact on population and housing.

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**Public Services (e.g., result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities)?**

*Final IS/MND evaluation: No Impact*

The proposed access route and work area would not require closures of any roadway, or additional construction workers, or permanent relocation of construction workers. The proposed access route and work area would not result in a new impact or increase the severity of a previously analyzed impact on public services.

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**Recreation (e.g., increases the use of, or cause adverse effects to, parks or other recreational facilities)?**

*Final IS/MND evaluation: Less Than Significant*

The proposed access route and work area are located on private land and no parks or recreational facilities are located adjacent to the property; therefore, use of the access route and work area would have no impact on recreational facilities or parks. The proposed access route would not result in a new impact or increase the severity of a previously analyzed impact on recreation.

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**Transportation and Traffic (e.g., increase traffic congestion or degrade performance of the circulation system, taking into account all modes of transportation, or increase hazards due to a design feature)?**

*Final IS/MND evaluation: Less than Significant*

The proposed access route and work area would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

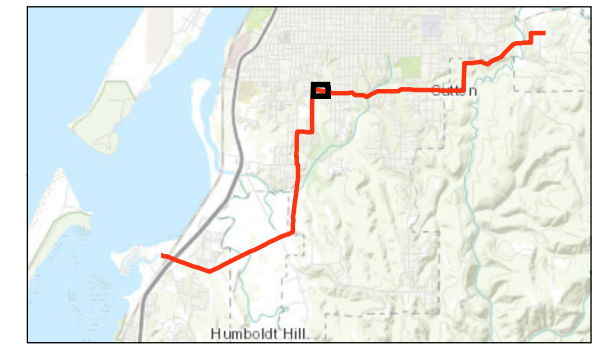
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**Utilities and Service Systems (e.g., exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board)?**

*Final IS/MND evaluation: No Impact*

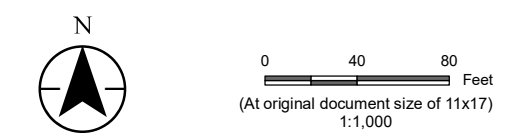
The proposed access route and work area would not include the construction of new, or expand existing, water facilities, stormwater drainage facilities, require additional water entitlements, or creation of new solid waste disposal needs.

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- Pole
  - Humboldt Bay-Humboldt #1 60kv Power Line
  - ▭ Proposed Work Area
  - Proposed Overland Access Route
- Wetland Type**
- Seasonally flooded forested and scrub-shrub

**Notes**  
 1. Coordinate System: NAD 1983 UTM Zone 10N  
 2. Data Sources: Stantec, PGandE  
 3. Background: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community  
 Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



**Project Location**  
 Humboldt County, CA

**Client/Project** 185705825  
 PG&E Humboldt Bay-Humboldt #1 60kV  
 Minor Project Refinement 06

**Figure**  
**1**

**Title**  
**Pole 56 - Overland Access and Work Area**



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