MINOR PROJECT REFINEMENT REQUEST FORM

Part A: Request Description

MPR Request

Request Number:	07
Date Requested:	June 15, 2023
Proposed Duration/ Timing of Use:	Upon approval through October 15, 2023 Daytime hours
Location:	Unincorporated Humboldt County; Towers 1a, 1b, 1, 2, 3, 4
Attached Map?	☐ Yes ☒ No

Proposed Action(s)

PG&E proposes to modify the foundation construction method from drilled piers to concrete driven piles for two Tubular Steel Poles (TSPs) (Towers 1a, 1b) and four Lattice Steel Towers (LSTs) (Towers 1, 2, 3, 4). No changes to approved work area footprints are proposed. PG&E estimates pile driving operations would occur over three days at each tower location and would not create impacts outside of the parameters anticipated in the IS/MND. All pile driving work would occur during daytime hours.

Purpose(s)

During final engineering, PG&E's engineers determined that concrete driven piles provide a more cost-effective, expedient, and less impactful method of foundation construction when compared to drilled piers. Drilled piers would require four 30-foot-deep, 6-foot-diameter excavations at each LST within an area of high groundwater. This would require extensive dewatering to keep the excavations dry for the concrete pour and could increase the potential for discharge of drilling fluids or compromised groundwater to wetlands at each tower site. Constructing drilled pier foundations would take up to 14 days at each LST compared to 3 days for driven pile foundations. Driven piles do not require use of drilling mud or slurry and would not require dewatering during installation. Concrete driven piles are driven into the soil with a crane or excavator mounted pile-driver similar to hammering a nail, without any use of fluids. The pile-driving would take place intermittently during daytime hours, in locations not immediately adjacent to residences. This proposed minor project refinement would substitute driven piles for foundation construction at TSPs 1a and 1b, and LSTs 1, 2, 3, and 4.

Part B: Existing Conditions

Existing Land Uses:	Undeveloped Coastal Wetland; Agricultural
Surrounding Land Uses:	Industrial; Residential in the broader area
Sensitive Receptors within 500 feet:	20 residences (3 within 300 feet)
Environmental Resources within 500 feet:	Coastal wetland complex
Has landowner approval been granted?	☐ Yes ☐ No ☒ N/A
Landowner:	APN: 305-131-350-000, 305-131-220-000, 305-101-120-000, 305-051-035-000, 305-051-002-000

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.

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.

Not relevant to the proposed refinement. No changes to approved work area footprints are proposed.

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?

Not relevant to the proposed refinement. No changes to approved work area footprints are proposed.

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

Not relevant to the proposed refinement. No changes to approved work area footprints are proposed.

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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.

N/A

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
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)?	☒	☐	☐
Final IS/MND evaluation: Less than Significant			
The proposed refinement would change subsurface foundation construction methods; therefore, no new impacts or increase in the severity of a previously analyzed impact on aesthetics would occur.			
Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)?	☒	☐	☐
Final IS/MND evaluation: No Impact			
The proposed refinement would change subsurface foundation construction methods; therefore, no new impacts or increase in the severity of a previously analyzed impact on agriculture and forestry resources would occur.			
Air Quality (e.g. produce additional emissions, or expose sensitive receptors to additional pollutants)?	☒	☐	☐
Final IS/MND evaluation: Less than Significant			
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.

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 refinement would change subsurface foundation construction methods; no changes to approved work area footprints are proposed. Therefore, no new impacts or increase in the severity of a previously analyzed impact on biological resources would occur.

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

The proposed refinement would change subsurface foundation construction methods; no changes to approved work area footprints are proposed. Therefore, no new impacts or increase in the severity of a previously analyzed impact on cultural and tribal cultural resources would occur.

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

The proposed refinement would change subsurface foundation construction methods; no changes to approved work area footprints are proposed. Therefore, no new impacts or increase in the severity of a previously analyzed impact on geology and soils would occur.

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 change in foundation construction 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 ISMND. APM GHG-1 would ensure that any impacts from emissions 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 greenhouse gas emissions.

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

The proposed refinement would change subsurface foundation construction methods; no changes to approved work area footprints are proposed. Therefore, no new impacts or increase in the severity of a previously analyzed impact on hazards and hazardous materials would occur.

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

Final IS/MND evaluation: Less than Significant

The proposed refinement would change subsurface foundation construction methods; no changes to approved work area footprints are proposed. Therefore, no new impacts or increase in the severity of a previously analyzed impact on hydrology and water quality would occur.

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 refinement would change subsurface foundation construction methods; no changes to approved work area footprints are proposed. Therefore, no new impacts or increase in the severity of a previously analyzed impact on land use and planning would occur.

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 refinement is 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.

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

Final IS/MND evaluation: Less than Significant with Mitigation

Pile driving for foundation construction would generate temporary noise and may result in perceptible vibrations that would be local to the area where the pile driving occurs. Pile driving is anticipated to occur intermittently over a period of three days at each of the six tower locations planned for construction in 2023. Noise levels from pile driving were calculated using the Roadway Construction Noise Model (RCNM) (FHWA 2006) which is consistent with the methodology used in the IS/MND. The RCNM provides maximum A-weighted (Lmax) sound pressure levels at a reference distance of 50 feet for impact pile drivers. The RCNM value for impact pile-driving equipment is 101 dBA with an acoustical usage factor of 20 percent (FHWA 2006). The table below summarizes the predicted average airborne sound level from impact pile driving at various distances considering the usage and distance losses.

Distance (feet)	Sound Level (dBA)	Residences	Tower
50	94	0	n/a
100	88	0	n/a
200	82	1	3
300	78	2	3,4
400	76	6	3,4
500	74	11	3,4

Noise levels associated with pile driving would be lower than the maximum construction noise levels evaluated in the Final IS/MND. The IS/MND considered a maximum construction noise level of 97.2 dBA at residential land uses and characterized the impact as significant as it exceeds the Federal Transportation Authority's (FTA's) daytime 1-hour Leq of 90 dBA, the level at which adverse community reaction could occur. For the six towers where pile driving is proposed, the closest sensitive receptors (i.e., residences) are one residence approximately 200 feet from Tower 3 and two residences within 300 feet from Tower 4 (see table above). There are no residences or sensitive receptors within 500 feet of Towers 1a, 1b, 1, and 2. Noise levels at the closest residence would be 82 dBA, which is below the FTA 90 dBA threshold considered significant in the IS/MND. FTA standards were used in the IS/MND as the reference for noise impacts because Humboldt County does not have a noise ordinance or quantitative standards for the analysis of construction noise. The following Mitigation Measures would apply to the refinement to further reduce potential noise impacts from pile driving: Mitigation Measure NOI-1b: Nighttime Construction and Mitigation Measure NOI-1c: Construction Noise Management. The proposed change in foundation construction would not result in a new impact or increase the severity of a previously analyzed impact associated with exposure of persons to or generation of excessive noise levels during construction of the project.

Pile-driving vibration levels at the nearest sensitive receptor would be lower than the anticipated project

vibration levels analyzed in the IS/MND. The IS/MND considers a maximum project vibration PPV (peak particle velocity) level of .14 in/sec at the nearest sensitive receptor and references the Caltrans PPV threshold of 0.24 in/sec as the significance threshold. At the closest sensitive receptor (200 feet), pile driving would result in a maximum vibration PPV level of .067 in/sec (FTA 2006), below the significance threshold and consistent with the IS/MND finding that impacts associated with exposure of persons to or generation of excessive ground-borne vibration levels during construction would be less than significant.

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 refinement would change subsurface foundation construction methods; no new impacts or increase in the severity of a previously analyzed impact on population and housing would occur.

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

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 refinement area is located on private land and no parks or recreational facilities are located adjacent to the property; therefore, the change in foundation construction would have no impact on recreational facilities or parks.

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 refinement would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

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 refinement 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.

References

FHWA (Federal Highway Administration). 2006. FHWA Roadway Construction Noise Model User's Guide. Final Report. FHWA-HEP-05-054. DOT-VNTSC-FHWA-05-01. Washington, DC: U.S. Department of Transportation. January 2006. Accessed June 2023. http://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf.

FTA (Federal Transit Administration). 2006. *Transit Noise and Vibration Impact Assessment. U.S. Department of Transportation.* FTA-VA-90-1003-06. Washington, DC: FTA. May 2006. Accessed June 2023. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/ FTA_Noise_and_Vibration_Manual.pdf.