



California Public Utilities Commission



October 18, 2022

Erin Rice
Sr. Land Planner
Pacific Gas and Electric Company
2730 Gateway Oaks, Rm 220, #235B
Sacramento, CA 95833

Re: Minor Project Refinement No. 1 for the Humboldt Reconductoring Project – (A.19-02-004)

Dear Mr. Rice:

On November 23, 2020, the California Public Utilities Commission (CPUC) adopted the Final Initial Study and Mitigated Negative Declaration (IS/MND) for the Humboldt Bay-Humboldt #1 60 kV Reconductoring Project (Project) and approved the Project (Application 19-02-004). The decision granted Pacific Gas and Electric Company (PG&E) a Permit to Construct and approved the Project conditionally with the implementation of Applicant Proposed Measures and Mitigation Measures adopted in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). Notice to Proceed (NTP)-2 (2022 Construction Scope) was issued by the CPUC on June 3, 2022. NTP-2 consists of construction activities from pole 6 (near Golden West Drive) to pole 115 (at Humboldt Substation) through calendar year 2022.

On August 18, 2022, PG&E provided the CPUC with Minor Project Refinement Request (MPRR1) to establish a new access route to access Pole 57 from the private residential driveway. As part of the approved Project, Pole 57 was originally planned to be replaced using a helicopter to set the pole. However, due to the size class of the structure to be installed, a heavy-lift (Blackhawk) helicopter would be required to safely transport the pole to the site from the landing zone. Given the proximity of the closest landowner's house to the flight path and pole location, there are concerns that property damage could occur from helicopter rotor wash. The proposed access method from the private residential driveway to Pole 57 is described by PG&E as a safer option to the originally proposed helicopter installation method. Existing paved public roads through a residential neighborhood would provide ground access to the proposed new access route.

The MPRR1 would require limited grading along approximately 80 feet of the access route (totaling approximately 450 square feet) to level the surface and allow for the safe passage of equipment. The new access route would extend approximately 240 feet from the end of the paved residential driveway. During the week of July 25, PG&E's construction contractor completed approximately 3,000 square feet of vegetation clearing from the power line right-of-way, including along the proposed new access route, which was unauthorized. PG&E has reported that applicable Applicant Proposed Measures (APMs) were implemented during the unauthorized vegetation clearing, including APMs BIO-1 through BIO-8, and there were no changes in biological resources impacts in the vicinity of Pole 57. In response to CPUC's request for clarification, PG&E indicated that it is taking the following steps to avoid additional unauthorized work from occurring:

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- The PG&E Environmental Team regularly attended morning meetings with the construction crew to understand upcoming work and provide directions for environmental compliance for upcoming work sites.
- The PG&E Environmental Team hosted weekly calls with the construction contractor to regularly coordinate between the two teams, including providing regular updates on the status of MPRs so it was clear for everyone what is approved and what is pending review.
- These things have helped establish a dynamic where the construction contractor has been cooperative and takes the initiative to understand the environmental requirements and contact the Environmental Team with questions.

The access route is located within the biological resources and cultural resources study areas identified in the Final IS/MND. No special status species, critical habitat, rare plants, or wetlands, or cultural resources, were identified within the proposed access route. The previously cleared vegetation consisted primarily of Himalayan blackberry, California huckleberry, twinberry, and red alder. No special status species, critical habitat, or rare plants were identified within the proposed access route. No additional impacts to vegetation from use of the new access route are expected. The proposed access route is located within the study area analyzed in the IS/MND. APMs BIO-1 through BIO-8 from the Final IS/MND apply to work at this location and will ensure that impacts on biological resources are less than significant. In addition, graded areas along the access route will be restored consistent with the Habitat Restoration Plan and Project Stormwater Pollution Prevention Plan (SWPPP) after use. With implementation of APMs from the Final IS/MND and BMPs contained in the Project SWPPP, use of the proposed access route would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

PG&E is authorized to proceed with the minor project refinement identified in its August 18 MPRR1 to CPUC upon condition that all proposed actions and construction are carried out in accordance with the methods and conditions described in NTP-2.

Sincerely,

John E. Forsythe, AICP
CPUC Environmental Project Manager

cc: Matt Fagundes, ESA
Even Holmboe, ESA

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