

September 14, 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. 2 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 23, 2022, PG&E provided the CPUC with Minor Project Refinement Request No. 2 (MPRR2) to use a Temporary Construction Easement (TCE) at 3660 O Street, Eureka, as a helicopter landing zone (LZ) to support helicopter operations (e.g., transport materials to and from construction sites), as well as facilitate other Project activities, including, but not limited to, staging and storing construction materials and equipment, refueling, and assembling construction materials. This proposed LZ would be used instead of the approved LZ site 200 feet to the east at Hemlock Street and O Street that was analyzed in the IS/MND.

PG&E's construction contractor has determined that the approved LZ is too close to existing distribution power lines along Hemlock Street and O Street to allow for safe helicopter operations. The proposed landing zone was selected by the construction contractor and PG&E because it is unimpeded by distribution power lines and would safely accommodate the larger helicopter required to transport materials to and from the construction site. Helicopters would approach and leave the proposed LZ from and to the south, respectively, to keep as much distance as possible from the nearby residences. The construction contractor evaluated the surrounding structures regarding the intended use of the LZ and identified no concerns regarding flying in close proximity to those structures.

Overland access routes or existing improved roads would provide ground access to the LZ. The proposed site has previously been utilized as a helicopter landing zone for other PG&E projects, not related to the Project. The LZ





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would be approximately 0.67 acre. No ground disturbance or vegetation removal would be required during the establishment or use of the landing zone.

On August 11, 2022, two SHN senior biologists conducted a biological and aquatic resource inventory for the LZ on behalf of PG&E. Perennial wetlands were found to exist immediately adjacent to the seasonal wetlands along the southern edge of the proposed LZ. Per Applicant Proposed Measures (APM) BIO-7 and APM BIO-9, work will not occur within the perennially saturated wetland and per APM BIO-2, refueling will occur offsite or in a designated location at least 100 feet from the perennially saturated wetland. No sensitive vegetation communities exist within the proposed LZ and no sensitive status species were observed within or adjacent to the proposed LZ. On August 12, 2022, Browning Cultural Resources, Inc. conducted an intensive pedestrian survey on behalf of PG&E and did not observe any cultural or tribal resources of concern.

The project change identified in MPRR2 consists of a minor project change that will not trigger other permit requirements, will not increase the severity of an impact, or create a new impact, and will clearly and strictly comply with the intent of the approved mitigation measure. The minor project refinement would not result in any changes to the impact conclusions in the Final IS/MND with implementation of relevant applicant proposed measures and mitigation measures listed in the MMCRP and will not trigger a permit requirement or require approval by another jurisdictional agency. The CPUC has determined that no further documentation is needed for compliance with CEQA.

PG&E is authorized to proceed with the minor project refinement identified in its August 23 MPRR2 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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