



California Public Utilities Commission



September 30, 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. 5 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 September 26, 2022, PG&E provided the CPUC with Minor Project Refinement Request No. 5 (MPRR5) to move Pole 66 (an angle pole) and its associated anchor approximately 40 feet west towards Pole 65 to relocate the pole outside of a saturated wetland. The pole is located on a residential parcel in the City of Eureka (APN: 018-211-005-000). PG&E proposes to access the new pole location via a new overland access route, some of which has been established by the landowner. The proposed new pole location and access route are located within the study area of the Final IS/MND. The proposed pole relocation would require overland travel from the landowner's driveway approximately 560 feet to the new pole location. The route would be utilized by an excavator to drill the pole hole and install a culvert sleeve. Based on a request for clarification from CPUC, PG&E provided CPUC with MPRR5 Revision 1 on September 29 to clarify that a helicopter would still be utilized to set the pole after the hole excavation is complete, but the helicopter would not be used to fly excavation equipment or personnel to and from the site. No grading would occur, and all disturbance from the access route would be temporary. Existing paved roads through a residential neighborhood would provide ground access to the proposed access route. The proposed access route and pole work area will be restored, consistent with the project Habitat Restoration Plan and Stormwater Pollution Prevention Plan (SWPPP).

Preliminary engineering identified Pole 66 as a pole that could be excavated with light equipment flown to the pole site (i.e., all-terrain vehicles supported by hand-digging). Subsequent field visits have revealed that the current pole location is within a saturated finger of Martin Slough making a hand-dig unfeasible as the hole would fill with water and collapse. During final engineering and field evaluation of soil conditions, PG&E determined that a

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culvert sleeve is needed to stabilize the excavated hole, which requires larger excavation equipment to install. For this reason, overland access would be required for an excavator to access the pole site.

Engineering has identified a preferable location for the replacement pole approximately 40 feet west of the existing pole towards Pole 65. The proposed pole site is within a dry portion of the wetland. Moving the pole would reduce construction-related impacts on saturated wetlands and would facilitate less impactful access for pole maintenance.

The new pole, anchor, and overland travel route associated with Pole 66 are located within the study area included in the Final IS/MND. No special status species, critical habitat, or rare plants were identified within the proposed pole or anchor re-location sites or along the proposed overland travel access route. The proposed pole relocation work area and new overland access route are located within area mapped as seasonally flooded wetlands. The relocated pole work area and the original work area are equivalent in size (approximately 50 feet by 50 feet) and both are located within wetlands; however, the relocated pole work area is in a dry portion of the wetland outside of saturated soils. By relocating the pole further upland to dry wetlands less susceptible to compaction and soil mixing, impacts to functionally significant wetlands would likely be reduced. The temporary and permanent impact acreages related to Pole 66 construction would remain consistent with what was analyzed in the IS/MND. In addition, relocating the pole outside of the saturated wetland would facilitate less impactful access for routine maintenance. The new overland access route would cross approximately 150 feet of dry emergent wetland (see Figure 1 of MPRR5). Temporary impacts to wetlands from use of the new overland route would be minor given the limited use of the route. In accordance with APM-09, the access route would be matted within wetlands if work occurs during wet conditions. Consistent with the IS/MND, temporary impacts to wetlands from the pole relocation and overland access route would not involve grading but involve minor surface disturbance from driving and staging equipment.

Approximately 450 square feet of Himalayan blackberry would be removed to provide clearance to the new pole location and approximately 50 square feet of native grassland would be temporarily disturbed to install the new anchor. No additional vegetation clearing would be required. No special status species, critical habitat, or rare plants were identified within the proposed MPRR5 area. No additional impacts to vegetation would occur.

The project change identified in MPRR5 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 measures. 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.



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PG&E is authorized to proceed with the minor project refinement identified in its MPRR5 submitted September 26 (dated September 20) and its MPRR5 Revision 1 submitted September 29 upon condition that all proposed actions and construction are carried out in accordance with the methods and conditions described in NTP-2.

Sincerely,

A handwritten signature in blue ink that reads "John E. Forsythe".

John E. Forsythe, AICP
CPUC Environmental Project Manager

cc: Matt Fagundes, ESA
Even Holmboe, ESA