



California Public Utilities Commission



October 5, 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. 6 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. 6 (MPRR6) to use an overland access route and expand the Pole 56 work area from 20 feet by 20 feet to approximately 75 feet by 75 feet. The pole site is 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 evaluated for 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 previously 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 of 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 Stormwater Pollution Prevention Plan.

Preliminary project design and engineering identified Pole 56 to be set by a helicopter and 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 site is unsafe for a helicopter pole set or climb due to the out of standard leaning condition and the distribution underbuild of the existing pole. In addition, PG&E has determined that a culvert

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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.

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 expanded pole work area dimensions are consistent with ground-based pole work areas described in the IS/MND. In accordance with Applicant Proposed Measure 9, 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, which would have also occurred under approved helicopter 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 surface disturbance from operating and staging equipment. These impacts would be temporary, would be expected to passively restore, and would be subject to Mitigation Measure 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 overland 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. 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. Applicant proposed measures and mitigation measures 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 project change identified in MPRR6 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, as well as the best management practices contained in the Project Stormwater Pollution Prevention Plan 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 MPRR6 provided September 26 (dated September 23) 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 black ink that reads "John E. Forsythe".

John E. Forsythe, AICP
CPUC Environmental Project Manager

cc: Matt Fagundes, ESA
Even Holmboe, ESA