



California Public Utilities Commission



June 19, 2023

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

Re: Minor Project Refinement No. 7 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)-3 (2023 Construction Scope) was issued by the CPUC on May 15, 2023. NTP-3 consists of construction activities from the Humboldt Bay Substation to pole 6 (near Golden West Drive) through calendar year 2023.

On June 15, 2023, PG&E provided the CPUC with Minor Project Refinement Request No. 7 (MPRR7) 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.

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.

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The proposed minor project refinement would be located within an area mapped as undeveloped coastal wetland. This refinement would substitute driven piles for foundation construction at TSPs 1a and 1b, and LSTs 1, 2, 3, and 4. TSP 1b is located approximately 25 feet north of TSP 1a near the existing Humboldt Bay-Humboldt #2 pole planned for removal. 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 associated with pile driving would be lower than the maximum construction noise levels at the nearest sensitive receptors 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. 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. 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 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.

The project change identified in MPRR7 consists of a minor project change that will not trigger other permit requirements, require approval by another jurisdictional agency, increase the severity of an impact, or create a new impact. This change 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. 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 MPRR7 submitted June 15 upon condition that all proposed actions and construction are carried out in accordance with the methods and conditions described in NTP-3.

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