



California Public Utilities Commission



July 6, 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. 8 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 July 5, 2023, PG&E provided the CPUC with Minor Project Refinement Request No. 8 (MPRR8) to shift the TSP 1b work area boundary to accommodate adjustments to TSP 1a and 1b pole locations. PG&E would shift the eastern boundary of the TSP 1b work area approximately 10 feet east and south to provide sufficient workspace for foundation construction. The proposed work area shift would not increase the project impact footprint as the revised work area would be offset by a reduction in adjacent tower and pull site work areas.

During final engineering, PG&E determined that TSP 1a would conflict with electric distribution lines that will remain on the existing Humboldt Bay-Humboldt #1 60 kV poles. To eliminate this conflict, TSP 1a would need to shift 11 feet northeast to maintain sufficient distance between the new Humboldt Bay-Humboldt #1 60kV line and the existing distribution line. This in turn would require shifting TSP 1b 15 feet to the east to maintain a sufficient distance from TSP 1a. The shift in TSP locations necessitates a shift in the work areas so that equipment can remain centered on the TSP location.

The proposed minor project refinement would be located within an area mapped as 3-parameter emergent coastal wetland. The shifted tower work area is within the biological resources and cultural resources study areas included in the Final IS/MND. No special status species, critical habitat, rare plants, or cultural resources were identified within the existing or shifted tower work areas.

No net increase in wetland impacts would occur as the shifted work area boundary would be offset by reducing a portion of the approved work area that would no longer be needed. Applicant proposed measures (APMs) and



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mitigation measures from the Final IS/MND would apply to work at this location and would ensure that impacts are less than significant. APMs BIO-1 through BIO-8 from the Final IS/MND apply to this refinement and will ensure that impacts on biological resources are less than significant. Further, disturbed areas will be restored consistent with the Habitat Restoration Plan and Project Stormwater Pollution Prevention Plan (SWPPP) after use. No known cultural or paleontological resources are located at the site. While there is a possibility of inadvertent discovery of buried remains during implementation of the project, implementation of APM CUL-1, APM CUL-3, APM CUL-4, APM PALEO-1, and APM PALEO-2, would reduce the potential for damage or destruction to archaeological and paleontological resources. Implementation of APM WQ-1 and APM WQ-2 would ensure that any impacts to water quality would remain less than significant. With implementation of APMs and mitigation measures from the Final IS/MND and Best Management Practices contained in the Project SWPPP, the shifted work area will not result in a new impact or increase the severity of a previously analyzed impact on biological resources, cultural or tribal resources, or hydrology and water quality.

The project change identified in MPRR8 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.

PG&E is authorized to proceed with the minor project refinement identified in its MPRR8 submitted July 5 upon condition that all proposed actions and construction are carried out in accordance with the methods and conditions described in NTP-3.

Sincerely,

John E. Forsythe, AICP
CPUC Environmental Project Manager

cc: Matt Fagundes, ESA
Even Holmboe, ESA