
PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 18, 2013

Mr. Mark Cassady
TRC, Inc.
Senior Biologist
405 Clyde Avenue
Mountain View, CA 94043

Subject: Atascadero-San Luis Obispo 70-kV Power Line Reconductoring Project Variance Request #15

Dear Mr. Cassady:

I have reviewed Pacific Gas and Electric Company's (PG&E's) Variance Request #15, which was submitted on June 6, 2013, for the Atascadero-San Luis Obispo 70-kilovolt (kV) Power Line Reconductoring Project (project). The California Public Utilities Commission (CPUC) has determined that PG&E's proposal to relocate Poles 66/7, 66/8, and 66/9, as well as install a temporary guard structure between Towers 73/3 and 73/4, would not create new significant impacts or significantly greater environmental impacts than those analyzed in the approved Final Initial Study/Mitigated Negative Declaration (IS/MND) for the project. A description of PG&E's proposed actions and an analysis of the environmental impacts are presented below.

Proposed Actions

Relocation of Poles 66/7, 66/8, and 66/9

PG&E proposes to relocate three poles from their current location to address mapping discrepancies between PG&E's design drawings and the proposed locations described in the IS/MND, as follows: Pole 66/7 would be moved 42 feet north; Pole 66/8 would be moved 92 feet north; and, Pole 66/9 would be moved 128 feet north. The three existing wood poles and the proposed light-duty steel (LDS) replacement pole locations are shown in PG&E's Request for Variance #15 (Attachment A). Pole replacement would be conducted as described in the IS/MND.

Temporary Guard Structure

PG&E also proposes to install a temporary guard structure under the project power line between Towers 73/3 and 73/4 to protect a distribution power line during reconductoring, which provides power to a residence in Reservoir Canyon (location shown in Attachment A). The guard structure would protect the distribution line and avoid taking it out of service for approximately two weeks. The guard structure would be installed prior to the start of reconductoring in the tower section, currently scheduled in August. The guard structure would be constructed of cables and netting supported by four poles set in the ground and anchored using guy-wires as needed. Installation and removal of the guard structure would require use

of an approximately 0.23-acre work space. Ground disturbance would be limited to auguring four pole holes and setting guy-wire anchors. The poles would be installed similarly to power line poles, as described in the IS/MND. Access to the guard structure would be via a previously approved work space to the north (described in Variance #13). The guard structure would be removed once construction is complete and the disturbed area would be restored to its current condition.

Analysis of Environmental Impacts

The proposed actions were reviewed to determine whether they would result in new significant environmental effects or would substantially increase the severity of a previously identified environmental effect, as addressed in the IS/MND. Variance Request #15 is consistent with the analysis presented in the IS/MND and additional California Environmental Quality Act (CEQA) review is not required. An analysis of these findings is presented below.

Aesthetics

Aesthetic impacts from the project were evaluated in the IS/MND and determined to be less than significant. Relocating three LDS poles between 42 and 128 feet would not change visual impacts from the project. Replacement of the three existing wood poles with new LDS poles is consistent with the IS/MND, and no new poles would be installed; therefore, relocation of the poles would not create new or greater aesthetic impacts than those analyzed in the IS/MND.

The guard structure would be located on private land owned by the resident whose home is powered by the described distribution line. The purpose of the guard structure is to ensure the home would not lose power during reconductoring of the project power line. PG&E has worked closely with the landowner throughout the project, and shall notify them regarding temporary use of the guard structure. The guard structure would not be easily visible to other adjacent residents. Use of the guard structure would be temporary and removed once construction is complete. Temporary impacts to aesthetics from project construction activities, including installation and removal of the guard structure, would be less than significant with implementation of applicant proposed measures (APM) AE-1, which requires PG&E to keep construction activities as conspicuous as possible.

Agriculture and Forestry Resources

The three pole locations and the temporary guard structure are located within grazing land designated by the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP). Impacts to grazing land were evaluated in the IS/MND and determined to be less than significant. Relocation of the three poles would not change impacts to agricultural resources. Impacts to approximately 0.23 acre of grazing land from the guard structure would be temporary and the work area would be restored to its previous condition once construction is complete; therefore, impacts to agricultural resources would be consistent with the impact level evaluated in the IS/MND and remain less than significant.

The proposed actions would not impact forestry resources.

Air Quality and Greenhouse Gases

Relocation of the three poles would not involve the use of additional equipment or increase dust generation. Installation and removal of the guard structure would involve a low level of additional vehicles and equipment. Dust generation from installation and removal of the guard structure would not be significantly greater than analyzed in the IS/MND. Naturally occurring asbestos is present at the proposed guard structure site in Reservoir Canyon. Implementation of APM AQ-2, Mitigation Measure (MM) AQ-1, and MM AQ-3 would ensure impacts to air quality and greenhouse gases would remain less than significant.

Biological Resources

The proposed work actions would have a less than significant impact to biological resources.

The perimeter of a federally jurisdictional seasonal wetland¹ (shown in Attachment A) extends into the western sides of the Pole 66/9 work areas (both existing and proposed). Impacts to the wetland were evaluated in the IS/MND and determined to be less than significant with implementation of APM BO-12, APM BO-22, APM WQ-3, and APM WQ-4, which require PG&E to limit impacts to wetlands, use protective mats as needed, monitor and manage erosion using best management practices (BMPs), and to keep hazardous materials away from water features. The wetland extending through Pole 66/9 work areas would be avoided, and there would be no new or additional impacts to wetlands. PG&E proposes to mark the limits of the wetland for avoidance within the pole work spaces to ensure no impacts take place. With implementation of the above APMs and avoidance through exclusion marking, impacts the seasonal wetland would be the same as evaluated in the IS/MND.

California Red-Legged Frog (CRLF). The three poles and proposed temporary guard structure area are located within CRLF Critical Habitat as identified by the United States Fish and Wildlife Service (USFWS). Project impacts to CRLF Critical Habitat were addressed in the IS/MND. Relocation of the Poles 66/7, 66/8, and 66/9 would not change these impacts.

The temporary guard structure would involve ground disturbance during installation and removal of four support poles within CRLF Critical Habitat, as well as within 300 feet of suitable aquatic habitat located at Reservoir Creek, a tributary to San Luis Obispo Creek.

Impacts to CRLF and CRLF habitat would be consistent with those analyzed in the IS/MND and effects would be mitigated with implementation of APM BO-9, APM BO-15, APM BO-17, APM BO-18, APM BO-19, MM BO-4, MM BO-5, MM BO-14, MM BO-21, and MM BO-39.

PG&E obtained a Biological Opinion (BO) through Section 7 consultation with the USFWS for the project prior to commencement of construction of the project. The BO authorizes impacts and incidental take of CRLF from project activities similar to those associated with the proposed

¹ The seasonal wetland is described as W2 in the TRC March 2010 Biological Assessment

guard structure; however, the guard structure would involve new ground disturbance within designated and sensitive CRLF habitat. As a condition of approval², PG&E shall consult with USFWS regarding new temporary ground disturbance within CRLF critical habitat, prior to installation of the guard structure. PG&E shall provide the CPUC with documentation of USFWS approval or amendments to the BO prior to installing the guard structure.

Special Status Vegetation. Special status vegetation surveys were conducted in the project study area identified in the IS/MND. Terra Verde conducted subsequent surveys in the proposed work areas in March and June 2013. No special status plant species were identified in the proposed work areas; therefore, no special status plants would be impacted as a result of the proposed actions.

Cultural and Paleontological Resources

The proposed work areas are all located within the IS/MND project study area, which was previously surveyed for cultural and paleontological resources. One cultural resource was identified approximately 170 feet from the proposed guard structure. Applied EarthWorks described the resource and referenced avoidance of it as follows:

AE-1906-1H [P-40-041211³] is a segment of a retaining wall constructed of river cobbles and rough aggregate concrete/mortar that reinforces a portion of Reservoir Canyon Road. No towers or pull sites are located in the vicinity of this feature. If the proposed guard structure across Reservoir Canyon Road avoids the feature, no project-related impacts are anticipated (Linder et al. 2009).

MM CR-1 was developed to address potential impacts to P-40-041211 from project activities. The guard structure would be installed away from the resource on the opposite side of Reservoir Canyon Road, approximately 170 feet north. With implementation of MM CR-1 potential impacts to P-40-041211 would remain less than significant. Implementation of APM CR-3 and MM CR-6 would ensure impacts to any unidentified cultural resource would remain less than significant.

The three poles and guard structure are located in areas identified with a low and moderate paleontological sensitivity, respectively. Impacts to paleontological resources were addressed in the IS/MND, and considered to be less than significant with implementation of mitigation in areas of high paleontological sensitivity. The proposed locations are not located in a high

² Condition of approval extends to installation of the temporary guard structure only.

³ Cultural resource AE-1906-1H was recoded to P-40-041211 in an Applied EarthWorks significance evaluation report (Baloian and Carr 2009), and described in the IS/MND as P-40-041211.

sensitivity area, and do not require mitigation; therefore, the proposed actions would not have significantly greater impacts to paleontological resources than those addressed in the IS/MND.

Geology, Soils, and Seismicity

Relocation of the three poles would not change impacts to geology, soils, or seismicity. The guard structure would involve temporary ground disturbance from auguring four pole holes and installing guy-wire supports. The temporary guard structure would be located within an approximately 0.23 acre work area used to maneuver vehicles and construct the structure. Erosion control BMPs would be installed as needed to prevent the release of sediment, as described in the project Stormwater Pollution and Prevention Plan (SWPPP). With implementation of erosion control BMPs, and applicable APMs and MMs, impacts to geology, soils, and seismicity would remain less than significant.

Hazards and Hazardous Materials

The proposed actions would not create new or greater hazards, or require use of additional hazardous materials other than those evaluated in the IS/MND. Implementation of applicable APMs and MMs would ensure potential impacts from hazards and hazardous materials would remain the same as those evaluated in the IS/MND.

Hydrology and Water Quality

Approximately half of the Pole 66/9 work areas are located in federally jurisdictional seasonal wetland (shown in Attachment A). Impacts to the seasonal wetland were evaluated in the IS/MND and determined to be less than significant with implementation of APM WQ-7, in addition to biological APMs described previously. PG&E shall mark the limits of the wetland within the pole work areas for avoidance. Erosion control BMPs would be installed at all proposed work sites, as described in the project SWPPP. With implementation of APMs, avoidance through exclusion marking, and use of BMPs, impacts to the seasonal wetland would be the same as evaluated in the IS/MND.

Land Use and Planning

The proposed actions would have no impact on land use and planning, and project impacts would be consistent with those evaluated in the IS/MND.

Mineral Resources

The proposed actions would have no impact on mineral resources, and project impacts would be consistent with those evaluated in the IS/MND.

Noise

Relocation of the three poles would not change noise levels evaluated in the IS/MND. Low amounts of noise would be generated from installation and removal of the guard structure. Noise would be minor and no greater than other construction occurring at adjacent work sites. Implementation of APM NS-1 through APM NS-8 would ensure noise impacts resulting from the proposed work would be reduced to less than significant.

Mr. Mark Cassady

June 17, 2013

Page 6

Population and Housing

The proposed actions would have no impact on population and housing, and project impacts would be consistent with those evaluated in the IS/MND.

Public Services

The proposed actions would have no impact on public services, and project impacts would be consistent with those evaluated in the IS/MND.

Recreation

The proposed actions would have no impact on recreation, and project impacts would be consistent with those evaluated in the IS/MND.

Transportation and Traffic

Relocation of the three poles would not require additional vehicle trips. Installation and removal of the proposed guard structure would require a low level of additional vehicle trips, but would not increase impacts to transportation and traffic greater than those evaluated in the IS/MND.

Utilities and Service Systems

The proposed actions would have no impact on utilities and service systems. The proposed guard structure would be located directly adjacent to the Central Coast Water Authority Coastal Branch Pipeline north of Reservoir Canyon Road. PG&E shall avoid impacting the water pipeline during installation and removal of the guard structure and consult with the California Department of Water Resources (DWR), as needed.

Conclusion

CPUC staff finds the changes proposed in PG&E's Variance Request #15 are not substantial; would not result in new or greater impacts to the environment; and do not present new substantial information that would change the findings presented in the IS/MND. The variance is consistent with the IS/MND and no additional CEQA analysis is required. *The variance is approved with one condition that PG&E consult with USFWS regarding new ground disturbance from the temporary guard structure within designated CRLF habitat. Documentation of USFWS approval is required prior to installation of the guard structure.*

Please contact me or Tania Treis at Panorama Environmental, Inc., if you have any questions.

Sincerely,

Jason Coontz

Jason Coontz

CPUC Project Manager

Mr. Mark Cassady
June 17, 2013
Page 7

Cc: Kris Vardas, PG&E
Tania Treis, Panorama Environmental, Inc.
Aaron Lui, Panorama Environmental, Inc.

Attached:

Attachment A: PG&E Variance Request #15

References:

- Baloian, Randy and Paula Carr. October 2009. Significance Evaluations for the Steel Tower Segment of the Atascadero–San Luis Obispo 70 kV Power Line, San Luis Obispo County, California. Applied EarthWorks.
- Linder et al. January 2009. Cultural Resources Survey for the Atascadero–San Luis Obispo 70 kV Power Line Maintenance and Upgrade Project, San Luis Obispo County, California. Applied EarthWorks.
- RMT. February 2011. Final Initial Study/Mitigated Negative Declaration for the Atascadero – San Luis Obispo 70 kV Power Line Reconductoring Project.
- TRC. March 2010. Biological Assessment for the Pacific Gas and Electric Company Atascadero – San Luis Obispo 70 kV Power Line Reconductoring Project, San Luis Obispo County, California.