
PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 19, 2013

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

Subject: Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project
Variance Request #16

Dear Mr. Cassady:

I have reviewed Pacific Gas and Electric Company's (PG&E) submission of Variance Request #16, which was submitted on August 16, 2013 for the Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project (project).

The CPUC has determined expanding the pull-and-tension site (PTS) north of Tower 73/3 would not create greater environmental impacts or new significant 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 and these findings is presented below.

Proposed Actions

PG&E proposes expanding a previously approved PTS in Reservoir Canyon located to the north of Tower 73/3 to incorporate approximately 0.5 acre of additional space surrounding the previous site. The proposed PTS is shown in the Request for Variance #16 which is attached to this letter.

The additional workspace is necessary to adequately orient vehicles and equipment under the power line to facilitate reconductoring between Tower 73/3 and the San Luis Obispo Substation. Work at the PTS would be consistent with the activities described in the IS/MND project description. Work is expected to take place for approximately two weeks, or until the power line segment is successfully reconducted.

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. Variance Request #16 is consistent with the

analysis presented in the Final IS/MND and additional CEQA review is not anticipated. An analysis of these findings is presented below.

Aesthetics

No Additional Impact. The additional PTS workspace is located around a previously approved PTS and work conducted within it would not change visual impacts evaluated in the IS/MND. Use of the space would be temporary and the site would be returned to preconstruction conditions once reconductoring is complete.

Agriculture and Forestry Resources

Less than Significant Impact. The additional PTS workspace, as well as other previously approved workspaces in Reservoir Canyon, are located on farmland designated as Grazing Land by the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP), as described in the IS/MND. Use of the additional 0.5-acre workspace would be temporary and the impact to farmland would remain less than significant as described in the IS/MND because additional grazing land is available in surrounding areas and the amount of grazing land that would be temporarily unavailable is minimal compared to the surrounding available grazing land. Temporary work areas, including the PTS, would be returned to preconstruction conditions once reconductoring is complete.

The proposed modification would not impact forestry resources.

Air Quality and Greenhouse Gases

Less than Significant Impact. The additional PTS workspace would not change the number of vehicles or equipment used for reconductoring; therefore greenhouse gas emissions evaluated in the IS/MND would not change.

Naturally occurring asbestos (NOA) has been identified in several work areas located in Reservoir Canyon. Expanding the PTS work area would not significantly increase dust generation greater than expected at the previously approved PTS because the level of pull and tension activity would not increase. Implementation of APM AQ-2, MM AQ-1, and MM AQ-3 would ensure impacts to air quality and greenhouse gases would remain less than significant.

Biological Resources

Less than Significant Impact. The proposed work activities would have a less than significant impact to biological resources.

California Red-Legged Frog (CRLF). The proposed PTS workspace is located within CRLF Critical Habitat as identified by the United States Fish and Wildlife Service (USFWS). Temporary workspaces within Critical Habitat were addressed in the Final IS/MND.

PG&E has obtained a Biological Opinion (BO) through Section 7 consultation with the USFWS. Impacts to CRLF and CRLF habitat would be consistent with those analyzed in the IS/MND and effects would be mitigated through 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.

No special status plants were identified at the PTS during previous surveys in the area. Vegetation coverage at the proposed PTS and adjacent work sites consists of heavily grazed, annual grassland habitat with sparsely scattered California sagebrush (*Artemisia californica*). The limits of the workspace will be marked by the Environmental Inspector ahead of crews to minimize disturbance to annual grassland and associated remnant California sagebrush shrubs.

In the event that any special-status species cannot be avoided PG&E shall consult with USFWS and or CDFW, as required by MM BO-29.

Raptors, nesting birds, burrowing owl. Raptors, nesting birds, and burrowing owl have the potential to occur around the proposed workspace. Potential impacts would be the same as those addressed in the IS/MND and would be less than significant with implementation of applicable avian APMs and MMs.

Cultural and Paleontological Resources

No Additional Impact. Applied Earthworks conducted a cultural resource surveys within the power line corridor in November and December 2008 in preparation of the IS/MND, and no cultural resources were identified within the proposed PTS work area. Work conducted at the site would be consistent with the work approved in the IS/MND.

Implementation of AMP CR-3 would ensure potential impacts to unanticipated cultural resource discoveries would be reduced to less than significant.

Geology, Soils, and Seismicity

No Additional Impact. The proposed PTS workspace would not increase or create new significant impacts to geology, soils, or seismicity. The additional workspace would be located around a previously approved PTS site. No grading would take place, and erosion control BMPs would be installed as needed to prevent the release of sedimentation, as described in the project Stormwater Pollution and Prevention Plan (SWPPP).

Hazards and Hazardous Materials

No Additional Impact. The proposed changes would not create new or greater hazards, or require use of additional hazardous materials other than those analyzed in the IS/MND. Implementation of applicable APMs and MMs would ensure potential impacts from hazards and hazardous materials remain the same as analyzed in the IS/MND.

Hydrology and Water Quality

No Additional Impact. The proposed PTS workspace would not create new or greater impacts to hydrology and water quality than those analyzed in the IS/MND. Erosion control BMPs would be installed, as needed, to minimize the erosion and sediment release, as described in the project SWPPP.

Land Use and Planning

No Additional Impact. The proposed PTS workspace would have no impact on land use and planning, and project impacts would be consistent with the impacts analyzed in the IS/MND.

Mineral Resources

No Additional Impact. The proposed PTS workspace would have no impact to mineral resources, and project impacts would be consistent with the impacts analyzed in the IS/MND.

Noise

No Additional Impact. The proposed PTS workspace would not create new or additional noise impacts greater than those analyzed in the IS/MND. Implementation of APM NS-1 through APM NS-8 would ensure noise from the proposed work would be reduced to less than significant.

Population and Housing

No Additional Impact. The proposed PTS workspace would have no impact to population and housing. The proposed changes would be consistent with the analysis in the IS/MND.

Public Services

No Additional Impact. The proposed PTS workspace would have no impact on public services. The proposed changes would be consistent with the analysis in the IS/MND.

Recreation

No Additional Impact. The proposed PTS workspace would have no impact to recreation. The proposed changes would be consistent with the analysis in the IS/MND.

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Transportation and Traffic

No Additional Impact. The proposed PTS workspace would have no impact on traffic or transportation. No additional vehicles would be used due to the expansion of the PTS. The proposed changes would be consistent with the analysis in the IS/MND.

Utilities and Service Systems

No Additional Impact. The proposed changes would have no impact on utilities and service systems.

Conclusion

CPUC staff finds the changes proposed in PG&E's Variance Request #16 are not substantial, would not result in new or significantly 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 or decisions are required.

Please contact me or Aaron Lui at Panorama Environmental, Inc., if you have any questions.

Sincerely,

Jason Coontz

Jason Coontz

CPUC Project Manager

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

Attached:

Attachment A: Variance Request #16

Environmental Variance Request Form

Atascadero – San Luis Obispo 70 kV Power Line Reconductoring Project

Date: August 16, 2013 Date by which Approval is Required: August 19, 2013

Location: Reservoir Canyon Current Land Use: Grasslands.

Ownership: Private County Road: No other: _____

Drawing/Plan No.: 24 of 35 Drawing/Sketch Attached? Yes, see attached map No _____

Variance Summary Description:

PG&E has requested the use of an additional area adjacent to Tower 73/3 for reconductoring of the steel tower section. Tower 73/3 currently has two approved pull/tension sites, however due to the orientation of the overhead conductors at that location coupled with the necessary space and topography required for equipment operation, the additional extra workspace is being requested. The additional pull/tension site is requested for the Tower 73/3 to SLO substation pull.

Describe variance in detail:

The additional workspace is shown in blue on the attached map. The workspace is heavily grazed annual grassland with patches of sparsely scattered California sagebrush (*Artemisia californica*). Project activities are not expected to impact California sagebrush shrubs. The workspace is triangular shaped in order to allow access for the reel truck which will need to back down to the tower from the access road.

Workspace limits will be marked by the Environmental Inspector ahead of crews to minimize disturbance to annual grassland. Crews are expected to avoid disturbing existing vegetation to the extent feasible.

Work is expected to occur for approximately 2 weeks, or until the line is successfully pulled.

Once pulled through, all equipment can be removed from the additional space. Equipment will be staged overnight with drip protection in place.

Reasons for the variance:

The extra workspace is requested because the originally mapped area for the 73/3 TPS is directly under the conductors. Per PG&E, the equipment needed to pull from 73/3 to SLO substation must be offset from under the alignment. Due to topography, shifting to the NW is most

desirable. Additionally, access was requested from above (farther north) to allow a truck to back down the hill with the reels.

CEQA Guidelines 15162 review: The proposed variance does not involve substantial changes to the project or project circumstances that will require major revisions to the mitigated negative declaration. It will not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts.

Aesthetics. No new or significantly greater impacts to aesthetics are anticipated.

Agriculture. The additional workspace in Reservoir Canyon would temporarily impact approximately 0.5 acre of grazing land. The area would be restored to current conditions once construction is complete. Temporary impacts to Grazing Land were addressed in the IS/MND and impacts would remain less than significant.

Biological Resources. Biological impacts would be similar to the impacts assessed in the IS/MND and would not have new or greater impacts. No new surveys are needed. Nesting bird surveys will continue within the appropriate survey buffer in accordance with the Avian Protection Plan.

Cultural and Paleontological Resources. The work area is within the cultural resource survey corridor for the project. Surveys at this location were negative and no cultural resources will be affected. There will be no grading and no paleontological resources will be affected.

Geology, Soils, and Seismicity. The proposed change would not increase or create new significant impacts to geology, soils, or seismicity.

Air Quality and Greenhouse Gases. Air quality impacts would be similar to the impacts assessed in the IS/MND and would not have new or greater impacts. Fugitive dust will be controlled by the use of a water truck during access and construction activities.

Noise and Traffic. Noise and traffic impacts would be similar to the impacts assessed in the IS/MND and would not have new or greater impacts.

Land Use. The proposed change would have no impact on land use and planning, and project impacts would be consistent with the impacts analyzed in the IS/MND.

Hydrology and Water Quality. Hydrology impacts would be similar to the impacts assessed in the IS/MND and would not have new or greater impacts. There are no aquatic features near the work space location.

Hazards. The proposed activity would not present new or greater impacts than those addressed in the IS/MND.

Population and Housing. The proposed changes would have no impact on population and housing. The proposed change would be consistent with the analysis in the IS/MND.

Public Services. The proposed change would have no impact on public services. The proposed change would be consistent with the analysis in the IS/MND.

Recreation. The proposed change would not result in new or greater impacts to recreation than analyzed in the IS/MND.

Utilities and Service Systems. The proposed change would have no impact on utilities and service systems.

_____This part to be completed by Environmental Monitor_____

Botanical Surveyed Required? Yes _____ No X _____

If yes, results of survey: _____ Survey Date: _

If no, explain why survey not needed: Previous surveys in the area were negative.

Survey report attached: Yes _____ No _____ Submitted separately by (date): _____

Wildlife Survey Required: Yes _____ No X _____

If yes, results of survey: _____ Survey Date: _

If no, explain why survey not needed: Previous surveys in the area were negative.

Survey report attached? Yes _____ No _____ Submitted separately by (date) _____

Cultural or Paleontology Resource Survey Required? Yes _____ No X _____

If yes, results of survey: _____ Survey Date: _____

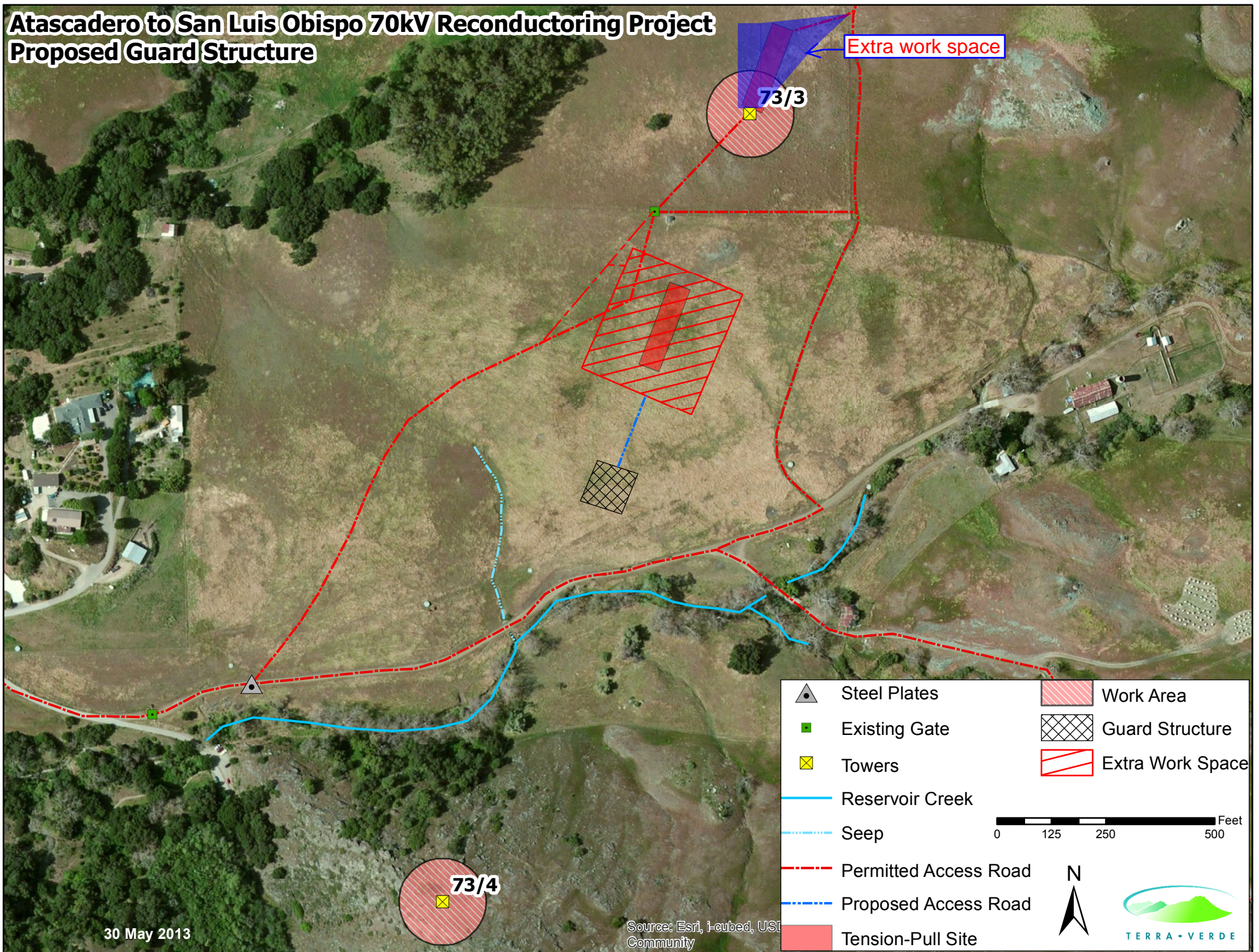
If no, explain why survey not needed: The location was previously surveyed by Applied Earthworks and no cultural resources were identified.

Survey report attached? Yes _____ No _____ Submitted separately by (date) _____

Attachment 1

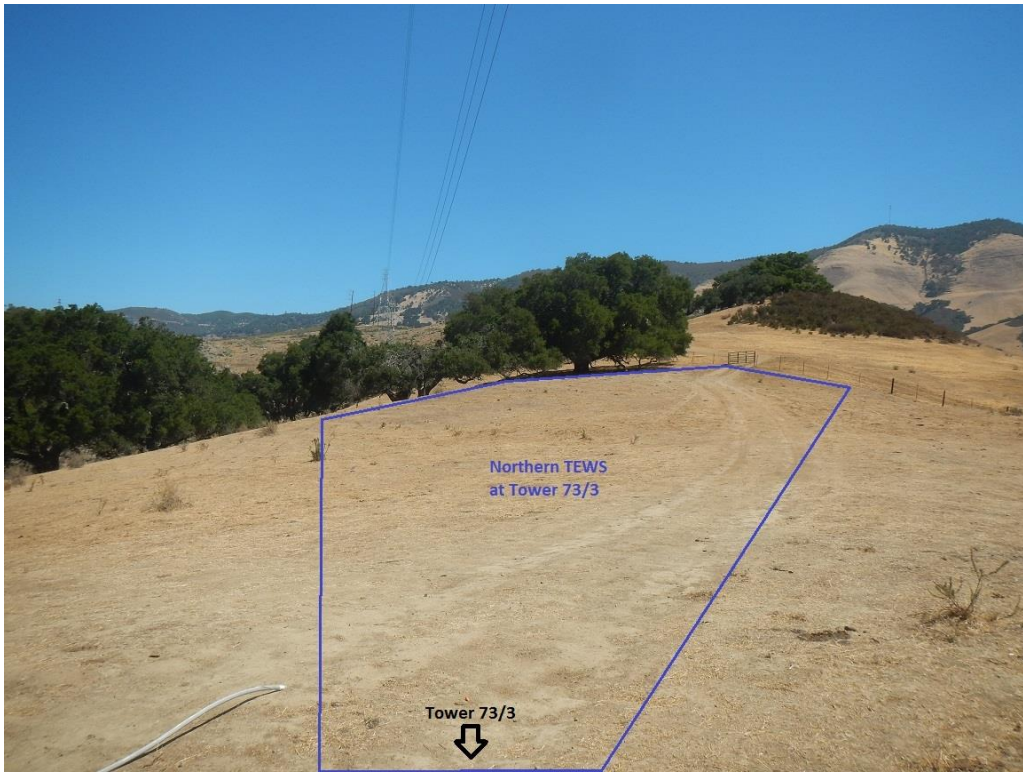
EWS Map and Photos

Atascadero to San Luis Obispo 70kV Reconductoring Project Proposed Guard Structure



30 May 2013

Source: Esri, i-cubed, US Community



Picture 1: Tower 73/3 TEWS.