

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 27, 2011

Mr. Mark Cassady  
TRC, Inc.  
Senior Biologist  
80 Stone Pine Rd # 200  
Half Moon Bay, CA 94019

Subject: Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project Variance Request #2 for Modifications to Pole Access Roads

Dear Mr. Cassady:

We have reviewed Variance Request #2, which Pacific Gas and Electric Company (PG&E) submitted on July 8, 2011 for the Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project (Project) and have determined that the proposed staging area will not have significant new or greater environmental impacts than analyzed in the approved IS/MND for the project, pursuant to the description and analysis presented in this letter.

### Proposed Actions

PG&E is requesting additional access roads that will require grading /vegetation removal activities due to storm damage and final scoping needs.

Access routes to project facilities were identified by PG&E during the planning process and these routes were included in Figure 2.4 of the approved Initial Study/Mitigated Negative Declaration (IS/MND) as either "Existing Access Road", "Reestablished Access Road", or Overland Access Route" category. The proposed modifications include

- Use of new access roads that were not previously identified in the IS/MND
- Changes to the category of some existing access roads
- New procedures for routine access road maintenance throughout the project duration

**New Access Roads Not Previously Identified in the IS/MND.** PG&E has identified additional roads along the wood pole segment located in the Atascadero area. These new roads are existing access roads that either do not currently require reestablishment, or short spur roads off of existing access roads that will be used for overland travel. Of the additional roads proposed for reestablishment, one – an existing access road segment that will provide access to Pole 69/0 –was not previously identified in the IS/MND. This route will require improvement and was originally classified as a "Reestablished Access Road".

**Changes of Access Road Category.** The following roads need to be reclassified as "Reestablished Access Road":

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- An existing access road through Reservoir Canyon that is currently used to access Towers 74/3 to 75/1 has become overgrown with brush in a few areas and will require hand clearing along a segment.
- An additional existing road that is needed to access Pole 61/16 will require removal of one tree.
- An additional existing road that is needed to access Pole 67/6 was mistakenly labeled as an existing road but will require grading and/or vegetation removal (Attachment 2).
- An existing spur road that is currently used to access Pole 67/10 will require some vegetation clearing and possibly some minor grading (Attachment 3).

**Routine Maintenance Procedures.** PG&E assumes that storms and associated runoff or other wear and tear has and will degrade project roads over the course of the project, which is currently projected for completion in 2013. Project access routes will require further routine grading and/or vegetation removal beyond that included in the initial scoping plan. PG&E estimates approximately 10 percent (2.7 miles) of project access roads above and beyond those already described will require such routine maintenance as defined within the approved IS/MND. The amount of additional grading performed will be monitored and the total amounts tracked. When approximately 90 percent of the estimated amount is reached, the CPUC will be notified. This variance does not include the grading of new roads not identified in the IS/MND.

#### **CPUC Analysis of Environmental Impacts**

**Biological and Cultural Resources.** Access roads were reviewed for botanical, wildlife, and cultural resources as part of the original project field work. The access road to Pole 69/0, which is outside of the original survey corridor for cultural resources, was reviewed for cultural resources and found to be negative (Attachment 4). Pre-construction biological surveys will be performed before grading begins on any road area and project APM and mitigation measures defined in the IS/MND will be implemented as appropriate to the area and the activity. Since all of the proposed activities were addressed in the approved IS/MND, no additional new or greater impacts are anticipated provided all mitigation measures and APMs are implemented.

**Air Quality.** The project as proposed resulted in significant fugitive dust emissions that exceeded the standards of the APCD; however, the IS/MND includes mitigation measures AQ-1, which, if implemented reduces impacts from fugitive dust to less than significant levels. The additional road grading (10 percent) would result in an increase in fugitive dust emissions from grading of an estimated 0.01 tons. The mitigation identified in the IS/MND; however, that requires the implementation of the Fugitive Dust Control Plan and the limiting of mower and water truck usage to 6 hours or less per day, would still reduce potential impacts from dust to less than significant levels and no new or greater impacts than were addressed in the IS/MND are anticipated.

**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.

**Hazards and Hydrology.** Hazards and hydrology impacts would be the same as assessed in the approved IS/MND. Measures to contain spills and minimize hazards, including fire hazards, and



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to prevent sedimentation or runoff would be implemented as required in the approved IS/MND. No new or greater impacts associated with hazards or hydrology would occur.

**Approval**

The modifications to pole access roads will not have significantly greater or new significant impacts beyond those identified in the IS/MND prepared for the Project. Variance Request #2 is therefore approved and is subject to all mitigation measures pertinent to the Project. Please contact me or Tania Treis of RMT if you have any questions.

Sincerely,



Lisa Orsaba

CPUC Project Manager

Cc: Andrew, RMT, Inc.  
Tania Treis, RMT, Inc.  
Jo Lynn Lambert, PG&E attorney

- Attachment 1: Variance #2 Request Submittal
- Attachment 2: Map of Access Road to Pole 67/6
- Attachment 3: Map of Access Road to Pole 67/10
- Attachment 4: Archaeological Report