

## PUBLIC UTILITIES COMMISSION



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████████████████████  
December 23, 2015

Mr. Nate Lishman  
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**RE: Application Completeness – Permit to Construct the Fulton-Fitch Mountain Reconductoring Project – Application No. A.15-12-005**

Dear Mr. Lishman:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its first review of Pacific Gas and Electric Company's (PG&E) Application (A.15-12-005) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct (PTC) the Fulton-Fitch Mountain Reconductoring Project.

Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses CPUC's Information and Criteria List and PEA Checklist as the guide for determining the adequacy of project applications.

After review of PG&E's application for the Fulton-Fitch Mountain Reconductoring Project, the Energy Division finds that the information contained in the PEA is incomplete. While it is thorough in many sections, there are information gaps in critical areas that would prevent preparation of an adequate CEQA document in a timely manner. The attached report identifies the portions of the application found to be deficient.

Information provided by PG&E in response to the Energy Division's finding of deficiency should be filed as supplements to Application A.15-12-005. One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, in both hardcopy and electronic format. We request that PG&E respond to this report no later than January 22, 2016. Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and amended application as complete. We will be available to meet with you at your convenience to discuss these items.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should PG&E's PTC be approved.

Please direct questions related to this application to me at ██████████ or ██████████.

Sincerely,

*MJOrsaba*

Lisa Orsaba  
Project Manager  
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor  
Elizabeth Dorman, CPUC Attorney  
Jo Lynn Lambert, PG&E Attorney  
Tania Treis, Project Manager, Panorama Environmental  
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## DEFICIENCY REPORT #1 FOR THE PG&E FULTON-FITCH MOUNTAIN RECONDUCTORING PROJECT – APPLICATION NO. A.15-12-005

### REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in Pacific Gas and Electric Company’s (PG&E) Application (A.15-12-005) and Proponent’s Environmental Assessment (PEA) for a Permit to Construct (PTC) the Fulton-Fitch Mountain Reconductoring Project (project). Deficiencies were identified using the CPUC PEA Checklist (November 2008) and the CPUC Information and Criteria List (July 2008). Deficiencies are presented in Table 1.

**Table 1 PG&E Fulton-Fitch Mountain Reconductoring Project Application Deficiencies**

ID	PEA Requirement References	Applicant References	Issue	Deficiencies
<b>Introduction (IN)</b>				
IN-01	<b>PEA Checklist:</b> Chapter 1: PEA Summary  <b>Information and Criteria List:</b> Section V(9)	<b>Application:</b> Exhibit D – EMF Field Management Plan  <b>PEA:</b> 00c Index to CPUC PEA Requirements 1.0 PEA Summary 2.3.1 Fulton-Shiloh Segment	<b>Potential areas of controversy</b>  The PEA states there are no known areas of controversy for the project; however, the Project Description discusses the project alignment near schools (e.g., Mark West Elementary School and the joint campus of the San Miguel Elementary and Mark West Charter schools) and raising the heights of existing poles located adjacent to schools to reduce EMF was evaluated in the EMF Field Management Plan.	a. Provide a description of EMF impacts to schools along the project alignment including any potential increase in EMF levels as a result of the project.  b. Provide a description of any outreach that has been conducted with schools for the project.
IN-02	<b>PEA Checklist:</b> Chapter 1: PEA Summary	<b>PEA:</b> 00c Index to CPUC PEA Requirements	<b>Description of public outreach</b>  The Index to CPUC PEA Requirements states that a description of public outreach efforts is included in the PTC Application; however, there is no mention of public outreach efforts in the Application.	Provide a description of public outreach efforts completed to date.

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IN-03	<p><b>PEA Checklist:</b> Chapter 1: PEA Summary</p>	<p><b>Application:</b> IV. Additional Information Required By Section IX(B) of GO 131-D</p> <p><b>PEA:</b> 00c Index to CPUC PEA Requirements</p>	<p><b>Description of inter-agency coordination</b></p> <p>The Index to CPUC PEA Requirements states that a description of inter-agency coordination is included in the PTC Application. Section IV of the Application states that PG&amp;E met with staff from the Central Coast Regional Water Quality Control Board (CCRWQCB) regarding the project in 2012; however, the project is located in Sonoma County which is located in the North Coast Regional Water Quality Control Board (NCRWQCB) region (Region 1) as stated in the PEA Hydrology and Water Quality Section.</p>	<p>Provide a description of coordination efforts with the CCRWQCB and address why the NCRWQCB was not contacted.</p>
<b>Project Description (PD)</b>				
PD-01	<p><b>PEA Checklist:</b> 3.2 Existing System</p> <p><b>Information and Criteria List:</b> Section V(10)</p>	<p><b>PEA:</b> 2.2 Project Objective, Purpose, and Need</p> <p>2.4 Existing System</p>	<p><b>Existing system information and project objectives</b></p> <p>The Project Description states the existing conductor on the Fulton-Hopland Line between Fulton Substation and Fitch Mountain #1 Tap is 4/0 aluminum, which has a summer interior rating of 375 amperes. No information is provided regarding the existing conductor and summer interior rating on the Fulton-Hopland line from Fitch Mountain #1 Tap to Hopland Substation. This information is needed to evaluate the project purpose and need.</p> <p>The Project Description states the Geyserville Substation serves customers in the City of Geyserville and surrounding areas, and following construction of the project, Geyserville Substation would have an alternate source of power during an outage. Additional information regarding</p>	<p>a. Provide the existing conductor and summer interior rating on the Fulton-Hopland line from Fitch Mountain #1 Tap to Hopland Substation.</p> <p>b. Describe the existing system in greater detail and why existing power sources for the Geyserville Substation are not sufficient.</p>

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			the existing system and project objectives is needed.	
PD-02	<b>PEA Checklist:</b> 3.2 Existing System 3.4 Proposed Project	<b>PEA:</b> 2.3.1 Fulton-Shiloh Segment	<p><b>Existing clearances and separation distances for the Fulton-Shiloh Segment</b></p> <p>The Project Description states that an existing 12-kV distribution line along Old Redwood Highway would be relocated, and two street lights along Faught Road would be lowered or moved to provide adequate clearance. The location of the existing and relocated 12-kV distribution pole and additional information regarding existing clearances for the 60-kV line were not provided.</p> <p>The Project Description states the 60-kV conductor would have minimum separation distances of 10 feet vertically and 15 feet horizontally, and the minimum separation distances between the 60 kV conductor underbuild and the 230-kV conductor will be 20 feet vertically and 15 feet horizontally. The existing separation distances for these lines are not provided in the PEA. This information is needed to determine if the location of conductor on existing poles would change.</p>	a. Describe how existing clearances for the Fulton-Shiloh Segment would change, and if the existing 60-kV line has the same clearance violations that would be addressed with proposed conductor. b. Provide the existing and proposed 12-kV distribution pole location along Old Redwood Highway that would be relocated with GIS data for project structures (see PD-07 for additional details). c. Provide existing conductor separation distances for the Fulton-Shiloh Segment.
PD-03	<b>PEA Checklist:</b> 3.2 Existing System 3.4 Proposed Project	<b>PEA:</b> 2.5.1.1 Fulton-Shiloh Segment	<p><b>Conductor for the Fulton-Shiloh Segment</b></p> <p>The Project Description states existing 230-kV conductor on the Geysers #12-Fulton Line, currently bundled 1113 kcmil all aluminum conductor (AAC), will be replaced with 954 kcmil ACSS 54/7 "Cardinal" conductor, and that the new conductor would not increase in capacity. No information is given</p>	a. Clarify if the new 230-kV conductor installed for the Fulton-Shiloh Segment would be bundled. If the conductor would be bundled, explain how the capacity of the 230-kV line would not increase as stated. b. Identify the spans where each type of conductor would be installed for the Fulton-Shiloh Segment using unique

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			<p>regarding the bundling of the new conductor.</p> <p>The Project Description states that a combination of 477 kcmil aluminum conductor steel supported (ACSS) 24/7 strand "Flicker," and 477 kcmil aluminum conductor composite reinforced (ACCR) 26/7 strand "Hawk;" however, the span locations where these two types of conductor are not identified.</p>	<p>structure IDs (see PD-07 for additional details).</p>
PD-04	<p><b>PEA Checklist:</b></p> <p>3.1 Project Location</p>	<p><b>PEA:</b></p> <p>2.7.3 Access Roads</p> <p>3.4 Biological Resources</p> <p>3.9 Hydrology</p>	<p><b>Drainage and wetland crossings</b></p> <p>The Project Description states that access roads cross seasonal watercourses or seasonal wetlands at several locations; however, the number of crossings and locations are not identified in the PEA.</p>	<p>a. Provide the number of seasonal watercourse and wetland crossings, a description of the feature being crossed including information on its jurisdictional determination, proposed type of crossings that would be used (e.g., fiberglass mats, steel plates, culverts, and/or temporary bridges, or "Arizona" low-water crossing), and a unique ID for each crossing location.</p> <p>b. Provide GIS point data for each crossing point corresponding to the unique ID and attributes described above.</p>
PD-05	<p><b>PEA Checklist:</b></p> <p>3.4 Proposed Project</p>	<p><b>PEA:</b></p> <p>Section 2.2</p>	<p><b>Capacity increase in Megawatts (MW)</b></p> <p>The PEA does not identify capacity increases in MW for the project, as required by the PEA Checklist.</p>	<p>Provide the capacity increases for each segment and for the substation in MW.</p>
PD-06	<p><b>PEA Checklist:</b></p> <p>3.4 Proposed Project</p> <p>3.5.2 Poles/Towers</p> <p>3.7.1.2 Work Areas</p> <p>3.7.1.5 Vegetation Clearance</p>	<p><b>PEA:</b></p> <p>00c Index to CPUC PEA Requirements</p> <p>2.7.2 Work Areas</p>	<p><b>Detailed workspaces and facility locations</b></p> <p>The Project Description describes the number of pole work areas, guard structure work areas, and pull sites that would be needed, but the locations are not identified.</p> <p>The Index to CPUC PEA Requirements states that GIS data would be provided to</p>	<p>Provide GIS data layers for the following project facilities and work areas based on preliminary engineering, as well as a corresponding detailed map book displaying the data (scale of approximately 1:3,000 or larger). The GIS data layers shall include unique object IDs and attributes that correspond to the PEA, technical reports,</p>

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	<p>3.7.2.1 Pull and Tension Sites</p> <p><b>Information and Criteria List:</b></p> <p>Section V(11)</p>		<p>CPUC separately; however, no GIS data layers nor any substantive detail maps identifying the location of project facilities or work areas have been provided to CPUC.</p>	<p>and survey reports. At a minimum, the GIS data must include the following layers:</p> <ol style="list-style-type: none"> <li>a. Existing PG&amp;E right-of-way (ROW) and easements</li> <li>b. Proposed PG&amp;E ROW and easements modifications need to construction and operate the project</li> <li>c. Existing and proposed project structures (see PD-07 for additional details)</li> <li>d. Existing footprints for the Fitch Mountain and Fulton Substations</li> <li>e. Proposed footprints for the Fitch Mountain and Fulton Substations, if different than existing</li> <li>f. Existing conductor alignments including name and voltage attributes</li> <li>g. Proposed conductor alignments including name and voltage attributes</li> <li>h. Temporary work areas broken down into the following attribute types:               <ol style="list-style-type: none"> <li>i. Staging areas</li> <li>ii. Material laydown areas</li> <li>iii. Helicopter landing zones and touch down areas (see PD-13 for additional details)</li> <li>iv. Structure access, installation, removal areas</li> <li>v. Pull sites (sometimes referred to pull and tension sites or stringing sites)</li> <li>vi. Guard structures (i.e., space for temporary pole installation or positioning a boom truck)</li> <li>vii. Drainage and wetland crossing installation areas (i.e., sufficient</li> </ol> </li> </ol>

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				<p>workspace beyond the access road on either side of the drainage to deliver and install materials, and park vehicles)</p> <ul style="list-style-type: none"> <li>i. Permanent work areas by attribute type (i.e., any work areas that would be developed or maintained free of vegetation)</li> <li>j. Turnaround, maneuvering, and parking areas along access roads and adjacent to other workspaces (See PD-12 for additional details)</li> <li>k. Any vegetation clearance or trimming areas that are not located within direct work areas such as mid-span locations and adjacent to access roads (see PD-18 for additional details)</li> </ul>
PD-07	<p><b>PEA Checklist:</b> 3.5.2 Poles/Towers <b>Information and Criteria List:</b> Section V(11)</p>	<p><b>PEA:</b> 00c Index to CPUC PEA Requirements 2.5.2 Poles</p>	<p><b>Structure locations, details, and unique IDs</b> Structure (i.e., poles and towers) details, unique IDs, and locations were not included with the PEA.  The Index to CPUC PEA Requirements states that GIS data for structures would be provided to CPUC separately; however, no GIS data layers nor any substantive detail maps identifying the location of project structure have been provided to CPUC.</p>	<p>Provide GIS point data based on preliminary engineering with the locations of all proposed and existing project structures that would be accessed in any way by the project. The GIS data layers shall include, unique object IDs and detailed attributes including but not limited to the structure type, height (feet above ground level), and base elevation (feet above mean sea level). Any structures that would be removed from existing locations or delivered to proposed locations by helicopter should be identified in the GIS (see PD-13 for additional details regarding helicopter transport). Structure categories for the project where GIS data is required include the following:</p> <ul style="list-style-type: none"> <li>a. Proposed structures that would installed</li> <li>b. Existing structures that would be removed</li> </ul>



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				<ul style="list-style-type: none"> <li>c. Existing structures that would be relocated (existing and proposed locations)</li> <li>d. Existing structures that would be modified and remain in place, or that would be accessed in any way during construction (e.g., TSPs along the Fulton-Shiloh Segment, topped structures, structures accessed during power clearances or reconnections following reconductoring, key interset poles that would be accessed, etc.)</li> <li>e. Temporary poles used for stringing or guard structures</li> </ul>
PD-08	<b>PEA Checklist:</b> 3.5.2 Poles/Towers	<b>PEA:</b> 2.5.2 Poles	<b>Typical structure diagrams</b> The Project Description contains varying height descriptions for typical structures that would be installed for the project. Height values vary between the PEA Project Description text and on Figures 2.0-3 and 2.0-4. LDS pole height descriptions in the text range from 58-73 feet, and from 70-85 feet on Figure 2.0-3. TSP height descriptions in the text range from 60-75 feet, and from 55-70 feet on Figure 2.0-4.	<ul style="list-style-type: none"> <li>a. Confirm the typical structure types and their heights that would be installed for the project.</li> <li>b. Confirm that typical structure information on Figures 2.0-3 and 2.0-4 is correct, or provide revised diagrams with correct heights and/or structure names.</li> <li>c. Clarify whether heights provided for each structure are the above ground heights or the total structure lengths including underground setting distance.</li> </ul>
PD-09	<b>PEA Checklist:</b> 3.5.4 Substations <b>Information and Criteria List:</b> Section V(11)	<b>PEA:</b> 00c Index to CPUC PEA Requirements 2.3.3 Substation Modifications 2.5.3 Substation Modifications	<b>Substation modifications</b> No substation plans or profiles were provide with the PEA for the Fulton or Fitch Mountain Substations. The Index to CPUC PEA Requirements states that substation plans and profiles would be provided to CPUC when design information is available. Preliminary engineering is	<ul style="list-style-type: none"> <li>a. Provide existing and proposed plans and profiles for the Fulton and Fitch Mountain Substations based on preliminary engineering.</li> <li>b. Describe any additional lighting fixtures that would be installed at the substations, or state that none would be installed.</li> </ul>

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			<p>needed for the proposed substation modifications.</p> <p>The potential need for additional lighting at substations is not addressed in the PEA.</p> <p>Detailed construction information for the proposed structures, retaining walls, and the control building at the Fitch Mountain Substation are not addressed in the PEA.</p>	<ul style="list-style-type: none"> <li>c. Describe installation of the proposed control building and retaining walls at the Fitch Mountain Substation, and if the control building would be built onsite or if it would be prefabricated and delivered to the site.</li> <li>d. Clarify if proposed structures in the substation would include foundations and if excavation would be required. If so, describe the foundations and installation process.</li> </ul>
<p><b>PD-10</b></p>	<p><b>PEA Checklist:</b> 3.6 Right-of-Way Requirements</p>	<p><b>PEA:</b> 2.6 Right-of-Way Requirements</p>	<p><b>ROW and easement requirements</b></p> <p>The Project Description states that the existing PG&amp;E easement for the Fulton-Shiloh Segment varies in width from 42 to 82 feet, and no width is specified for the Shiloh-Fitch Segment easement. No GIS data or maps were provided showing PG&amp;E's existing easements and ROW. Alternatively to the easement width for the Shiloh-Fulton Segment, the area maintained free of vegetation along the power line corridor was not provided.</p> <p>The Project Description describes PG&amp;E's existing easements, but it is not stated that the existing easements would be sufficient to construction the project. The PEA also states that "PG&amp;E may update or clarify its existing easement rights, as needed, prior to construction."</p> <p>The Project Description states that ingress and egress rights to the power line and transmission line are included in existing easement rights; however, the specific access routes on private land are not identified, and the limits of access are not defined.</p>	<ul style="list-style-type: none"> <li>a. Provide GIS data for the existing PG&amp;E easement for the project. If the extent of the easement for the Shiloh-Fulton Segment is undefined, provide the limits of areas maintained free of vegetation along the power line corridor.</li> <li>b. Describe what existing easement right clarifications are being referred to in Section 2.6 of the PEA.</li> <li>c. Identify all access routes on private land available to PG&amp;E through existing easements that would be used for the project (see PD-12 for additional details).</li> </ul>

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PD-11	<b>PEA Checklist:</b> 3.7.1.1 Staging Areas  <b>Information and Criteria List:</b> Section V(11)	<b>PEA:</b> 2.7.1 Staging Areas	<b>Staging areas</b> The Project Description lists the locations of potential staging areas, but these are not shown on a map and no GIS data were provided to CPUC.	a. Provide a map and GIS data with the locations of proposed staging areas (see PD-06 for additional details).  b. Provide written statements from the landowners that the identified staging areas would be available for use at the time of construction.
PD-12	<b>PEA Checklist:</b> 3.7.1.2 Work Areas 3.7.1.3 Access Roads and/or Spur Roads  <b>Information and Criteria List:</b> Section V(11)	<b>PEA:</b> 00c Index to CPUC PEA Requirements 2.7 Construction 2.7.3 Access Roads	<b>Access roads and footpaths</b> Access road widths, lengths, and area are listed in Table 2.0-1; however, the locations are not identified or shown on maps.  The Index to CPUC PEA Requirements states that GIS data for access roads would be provided to CPUC separately; however, no GIS data layers for access road locations have been provided to CPUC.  The Project Description states that minor adjustments to access roads may be necessary to address land use changes, unanticipated impacts, and other factors. More information is needed regarding the factors that PG&E believes could change access considerations.  The use of existing gates and installation of new gates is described in the Project Description; however the locations of these gates are not identified.	a. Provide GIS data for all access roads and footpaths that would provide sufficient access from public road ways to project work areas, including alternate access routes if the availability of the route is under question (see PD-06 for additional details regarding temporary access support work areas for turning around, maneuvering, and parking). The GIS data for access roads and footpaths shall include detailed attributes for each segment with unique characteristics including type (e.g., paved, graveled, unpaved bare ground, unpaved overland), ownership and PG&E easement rights, and proposed improvements or reestablishment.  b. Describe the potential factors in detail that are referred to in Section 2.7.3 of the PEA that could impede access road use. Describe and identify the locations of changing land uses that could block access road use. Describe what other factors could affect access road use.  c. Provide GIS point data for the locations of existing and proposed gates for the project.
PD-13	<b>PEA Checklist:</b>	<b>PEA:</b>	<b>Helicopter access</b>	a. Identify structures that would be transported from existing locations or to

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	<p>3.7.1.4 Helicopter Access</p> <p><b>Information and Criteria List:</b> Section V(11)</p>	<p>2.7.1 Staging Areas</p> <p>2.7.2.4 Helicopter Landing Zones</p>	<p>The Project Description states that helicopters will be used to facilitate access to the majority of work areas, deliver and remove materials, and to set poles; however, the proposed or exiting locations of poles that would be transported by helicopter are not identified. These locations are needed to determine flight paths and transport hazards over populated areas, and to assess air emissions from helicopter operation.</p> <p>The Project Description states that approximately six landing zones would be used, including two located within project staging areas; however, no location details, maps, or GIS were provided for these helicopter landing zones.</p> <p>The Project Description states that helicopters may also touch down at locations along the alignment other than landing zones when transporting workers and equipment; however, the locations of helicopter touch down areas have not been identified.</p>	<p>proposed locations by helicopter (see PD-07 for additional details regarding structure GIS attributes).</p> <ul style="list-style-type: none"> <li>b. Provide GIS data with the locations of helicopter landing zones within and outside of staging yards, and helicopter touch down locations.</li> <li>c. Describe any vegetation clearing or site development that would be needed at helicopter touch down areas, and identify paths needed to adjacent work areas (see PD-12 for additional details).</li> <li>d. Describe flight paths, payloads, and hours of operation for helicopter activities.</li> <li>e. Provide maps showing helicopter flight paths and any areas where helicopter activities would not occur.</li> </ul>
PD-14	<p><b>PEA Checklist:</b></p> <p>3.7.1.5 Vegetation Clearance</p>	<p><b>PEA:</b></p> <p>00c Index to CPUC PEA Requirements</p> <p>2.7.4 Vegetation Clearance</p>	<p><b>Vegetation clearance</b></p> <p>Vegetation clearing is described in the Project Description; however, there is no information on tree removal.</p> <p>Vegetation communities in the project area are shown on Figure 3.4-1 at a small project overview scale. The vegetation communities cannot be discerned at this scale and no GIS data was provided.</p> <p>The Index to CPUC PEA Requirements states that GIS data for vegetation communities and disturbance would be provided to CPUC separately; however,</p>	<ul style="list-style-type: none"> <li>a. Describe the types, and approximate number and size, of trees that may be removed.</li> <li>b. Provide GIS data for vegetation communities for the project corridor (within biological survey area), including a minimum buffer of 30 feet surrounding all work areas, access roads, and footpaths.</li> <li>c. Identify the locations where vegetation clearance (brushing, clearing, or mowing, tree trimming, and tree removal</li> </ul>

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			no GIS data layers or detail maps have been provided to CPUC.	would occur (see PD-06 for additional details).
PD-15	<b>PEA Checklist:</b> 3.7.1.6 Erosion and Sediment Control and Pollution Prevention during Construction	<b>PEA:</b> 2.7.5 Erosion and Sediment Control and Pollution Prevention during Construction	<b>Soil disturbance</b> The Project Description does not address specific areas of soil disturbance including acreage totals or cut-and-fill volumes, where required.	a. Identify areas of soil disturbance for the project based on preliminary engineering and GIS data submitted to CPUC (see PD-06 for additional details). b. Provided a table of estimated cut and fill volumes by specific soil disturbance location, or state that no cut and fill would occur.
PD-16	<b>PEA Checklist:</b> 3.7.5 Construction Workforce and Equipment	<b>PEA:</b> 2.7.7.5 Construction Workforce and Equipment	<b>Construction workforce and equipment</b> Table 2.0-2 in the Project Description does not list typical construction equipment and duration of use information for the following activities: <ul style="list-style-type: none"> <li>• Substation modifications</li> <li>• Vegetation removal and trimming</li> <li>• Equipment and helicopter refueling</li> <li>• Preparation of staging yards and work areas (e.g., grading equipment, gravel delivery trucks, etc.)</li> </ul> The Project Description is missing information on the specific number of crew members that would be required for each activity. The Project Description is missing information on peak and non-peak construction vehicle trips.	Provide a revised version of Table 2.0-2 that addresses all proposed project activities. Include columns for the number of crew members that would be needed for each activity and the peak and non-peak daily vehicle trips that would be involved with each activity during construction. If new types of equipment are added to Table 2.0-3, provide descriptions of the equipment.
PD-17	<b>PEA Checklist:</b> 3.8 Operation and Maintenance	<b>PEA:</b> 2.8 Operation and Maintenance	<b>Operation and maintenance</b> The Project Description briefly describes operation and maintenance of facilities on the conductor alignment, but does not address existing or proposed operation	a. Describe existing operation and maintenance activities at the Fitch Mountain Substation and Fulton Substation including how operation and maintenance would change with the

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			<p>and maintenance for the Fitch Mountain Substation or Fulton Substation.</p> <p>Vegetation clearance for construction activities is briefly described in the Project Description; however, vegetation clearance and trimming during operation and maintenance is not addressed.</p>	<p>proposed project, or state why it would not change.</p> <p>b. Describe existing areas that are maintained free of vegetation such as around existing poles, and any existing areas where vegetation is regularly trimmed such as trees adjacent to conductor along the alignment, or where pesticides are sprayed for fire protection. Describe any changes that would occur during operation and maintenance for the project, and state if fire prevention maintenance would change after wood poles are replaced with LDS poles along the Shiloh-Fulton Segment.</p>
<b>Air Quality and Greenhouse Gases (AQ/GHG)</b>				
<b>AQ/GHG-01</b>	<p><b>PEA Checklist:</b> 5.3 Air Quality <b>Information and Criteria List:</b> Section V(14)</p>	<p><b>PEA:</b> 00c Index to CPUC PEA Requirements 3.3 Air Quality</p>	<p><b>Air quality and GHG data</b></p> <p>The Index to CPUC PEA Requirements states that supporting air quality data would be provided to CPUC separately; however, no calculations, spreadsheets, or technical reports have been provided to CPUC.</p>	<p>Provide the data calculations, spreadsheets, and technical reports that support emission estimates in the PEA.</p>
<b>AQ/GHG-02</b>	<p><b>PEA Checklist:</b> 5.3 Air Quality <b>Information and Criteria List:</b> Section V(14)</p>	<p><b>PEA:</b> 3.3 Air Quality</p>	<p><b>Sensitive receptors</b></p> <p>The PEA does not include any information on distances to sensitive receptors.</p>	<p>Provide documentation of the location and types of sensitive receptors that could be impacted by the project (e.g., schools, hospitals, houses, etc.). Critical distances to receptors are dependent on the type of construction activity.</p>
<b>Biological Resources (BR)</b>				
<b>BR-01</b>	<p><b>PEA Checklist:</b> 5.4 Biological Resources</p>	<p><b>PEA:</b> 00c Index to CPUC PEA Requirements</p>	<p><b>Wetland delineation report</b></p> <p>The Index to CPUC PEA Requirements states that a copy of the Wetland Delineation and supporting</p>	<p>a. Provide a copy of the Wetland Delineation and supporting documentation (i.e., data sheets and records of correspondence with the U.S.</p>

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	<b>Information and Criteria List:</b> Section V(14)	3.4 Biological Resources	documentation would be provided to CPUC separately; however, this information has not been provided to CPUC.	Army Corps of Engineers regarding verification). If verified, provide supporting documentation.  b. Provide GIS data for wetlands with complete attributes corresponding to surveys, wetland delineation, and the PEA.
BR-02	<b>PEA Checklist:</b> 5.4 Biological Resources  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 00c Index to CPUC PEA Requirements 3.4 Biological Resources	<b>Biological survey reports</b> The Index to CPUC PEA Requirements states that survey reports for special-status species and supporting documentation would be provided to CPUC separately; however, this information has not been provided to CPUC. All survey reports completed for the project and referenced in Section 3.4 must be provided to the CPUC. The CPUC also requires GIS data with the location of special-status species, extent of vegetation communities, and biological survey areas.	a. Provide a copy of surveys for wildlife, botanical, and aquatic species, as applicable. b. Provide GIS data for biological survey areas broken down by survey date and surveyor, and that correspond to survey reports. c. Provide GIS data documenting locations of special-status species with complete attributes corresponding to survey reports and the PEA.
<b>Cultural/Paleontological Resources (C/PR)</b>				
C/PR-01	<b>PEA Checklist:</b> 5.5 Cultural Resources  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 00c Index to CPUC PEA Requirements 3.5 Cultural Resources	<b>Cultural Resources Report</b> The Index to CPUC PEA Requirements states that the Cultural Resources Report and copy of the records search found in literature would be provided to CPUC separately; however, no report has been provided to CPUC.	a. Provide a Cultural Resources Report documenting the cultural resources investigation for the project. The report needs to include a literature search, results of the field survey, and Native American consultation.  b. Provide GIS data for cultural survey areas broken down by survey date and surveyor, and that correspond to survey reports submitted with the Cultural Resources Report.

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				<ul style="list-style-type: none"> <li>c. Provide GIS data of all resources within the survey area and provided GIS data for the survey area.</li> <li>d. Provide a copy of all site records for any resources in the area.</li> </ul>
C/PR-02	<b>PEA Checklist:</b> 5.5 Cultural Resources  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 3.5 Cultural Resources	<b>Paleontological report</b> The Cultural Resources section of the PEA references a paleontological report that was prepared for the project. This report was not submitted with the PEA.	Provide the paleontological report.
<b>Geology, Soils, and Seismic Potential (GSS)</b>				
GSS-01	<b>PEA Checklist:</b> 5.6 Geology, Soils, and Seismic Potential  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 00c Index to CPUC PEA Requirements 3.6 Geology and Soils	<b>Geotechnical investigation</b> The Index to CPUC PEA Requirements states that a copy of the geotechnical investigation would be provided to CPUC separately; however, a geotechnical investigation has not been provided to CPUC. A geotechnical investigation needs to be completed given that pole replacement may occur in areas with shallow groundwater and where liquefaction or other geologic hazards could be a concern.	Provide a copy of the geotechnical investigation.
<b>Hazards and Hazardous Materials (HHM)</b>				
HHM-01	<b>PEA Checklist:</b> 5.7 Hazards and Hazardous Materials  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 00c Index to CPUC PEA Requirements 3.8 Hazards and Hazardous Materials	<b>Environmental Data Resources Report</b> The Index to CPUC PEA Requirements states that the Environmental Data Resources Report would be provided to CPUC separately (Environmental Data Resources, Inc. (2015)); however, the report has not been provided to CPUC. In addition, the index states that the Hazardous Substance Control and	<ul style="list-style-type: none"> <li>a. Provide a copy of the Environmental Data Resources Report.</li> <li>b. Clarify if a Hazardous Substance Control and Emergency Response Plan, Health and Safety Plan, or Worker Environmental Awareness Program have been prepared for the project. If so, provide these documents.</li> </ul>



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			Emergency Response Plan, Health and Safety Plan, and Worker Environmental Awareness Program are to be provided to CPUC separately.	
HHM-02	<b>PEA Checklist:</b> 5.7 Hazards and Hazardous Materials  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 3.8 Hazards and Hazardous Materials	<b>Hazardous materials used during construction</b>  The PEA does not include information on hazardous materials that would be used during construction and operation of the project.	a. Describe what chemicals would be used for construction and operation of the project.  b. Provide approximate quantities of each chemical that would be used.
<b>Hydrology and Water Quality (HWQ)</b>				
HWQ-01	<b>PEA Checklist:</b> 5.8 Hydrology and Water Quality  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 3.9 Hydrology and Water Quality	<b>Hydrology and water quality impacts</b>  Some hydrologic features in the project area are shown on Figure 3.9-1 at a small project overview scale; however, work areas adjacent to these features and the locations of drainage and wetland crossings are not shown and no GIS data was provided.	Provide GIS data layers for drainage and wetland crossings, and hydrologic features identified on Figure 3.9-1 (see PD-06 and BR-01 for additional details).
<b>Land Use and Planning (LUP)</b>				
LUP-01	<b>PEA Checklist:</b> 5.9 Land Use and Planning  Chapter 7: Other Process-Related Data Needs  <b>Information and Criteria List:</b> Section V(15)	<b>Application:</b> Section VI  <b>PEA:</b> Appendix A: Affected Properties within 300 feet	<b>GIS data for properties within 300 feet of project facilities</b>  A list of affected properties within 300 feet of the project was included in Appendix A of the PEA; however, GIS data or detailed maps of project facilities and properties within 300 feet were not provided with the PEA.	a. Provide GIS data for the 300-foot buffer from all project facilities used to identify properties within 300 feet that require noticing.  b. Provide GIS parcel data for affected properties within 300 feet with attributes that correspond to the affected properties list included with Appendix A of the PEA (e.g., APN number, owner mailing address, and parcels physical address).  c. Identify the source and dates of the GIS parcel data.

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<b>Noise (NS)</b>				
<b>NS-01</b>	<b>PEA Checklist:</b> 5.11 Noise <b>Information and Criteria List:</b> Sections V(12) and V(14)	<b>PEA:</b> 3.12 Noise	<b>Ambient noise levels</b> The PEA does not address ambient noise levels in the project area.	Provide baseline ambient noise level data for each noise environment in the project area.
<b>Recreation (REC)</b>				
<b>REC-01</b>	<b>PEA Checklist:</b> 5.14 Recreation <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 3.15 Recreation	<b>Trail and park closures</b> The PEA does not include information on the duration of park and trail closures.	Provide information on the location and duration of any trail or park closures during construction.
<b>Traffic and Transportation (TT)</b>				
<b>TT-01</b>	<b>PEA Checklist:</b> Chapter 4: Environmental Setting 5.15 Transportation and Traffic <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 3.16 Transportation and Traffic	<b>Baseline traffic conditions</b> The PEA only provides baseline traffic levels for two roads and existing level of service for five roads in the project area. Additional details are required regarding the existing conditions for all roads that would be used during construction to determine project impacts.	Provide baseline traffic levels and level of service for all roads that would be used during construction.
<b>TT-02</b>	<b>PEA Checklist:</b> 5.15 Transportation and Traffic <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 3.16 Transportation and Traffic	<b>Construction traffic trips</b> The PEA does not provide information on peak or non-peak vehicle trips for construction vehicles and workers during construction of the project.	Provide anticipated daily vehicle trips for construction vehicles and personnel during peak and non-peak construction periods.

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TT-03	<b>PEA Checklist:</b> 5.15 Transportation and Traffic  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 3.16 Transportation and Traffic	<b>Traffic impacts from streetlight removal</b> Traffic impacts from removal or relocation of streetlights on Faught road are not addressed in the PEA.	Provide a description of impacts on traffic safety from the removal or relocation of the street lights on Faught Road.
TT-04	<b>PEA Checklist:</b> Chapter 4: Environmental Setting 5.15 Transportation and Traffic  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 3.16 Transportation and Traffic	<b>Helicopter activities and impacts to air traffic</b> The PEA states the Sonoma County Airport is 2.3 miles west of the Fulton-Shiloh Segment; however, existing airspace in the project area, proposed flight paths, and helicopter landing zones are not identified. Transportation and traffic impacts for the project cannot be adequately addressed without this information.	a. Provide a description of existing airspace in the project area and impacts from the project. b. Provide a figure with the locations of proposed helicopter landing zones, proposed flight paths, and any helicopter avoidance areas, such as existing airspace with flight restrictions and where habitable structures are located (see PD-14 for additional details).
<b>Cumulative Impacts (CI)</b>				
CI-01	<b>PEA Checklist:</b> 5.17 Cumulative Analysis  <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> 3.18 3.18 Mandatory Findings of Significance and Cumulative Impact Analysis	<b>Cumulative projects list</b> The PEA only provides information on cumulative private projects in the vicinity of the project. The list of cumulative projects lacks any information on public, utility, or infrastructure projects in the vicinity of the project.	Provide a list of all PG&E, other utility project, Caltrans, or City projects proposed within 2 miles of the project.
<b>Alternatives (ALT)</b>				
ALT-01	<b>PEA Checklist:</b> 6.2 Description of Project Alternatives and Impact Analysis  <b>Information and Criteria List:</b>	<b>PEA:</b> N/A	<b>Project alternatives</b> The PEA does not address any project alternatives that were considered or state why none were considered.	Provide a description of any alternatives that were considered during project planning. The description should include any alternative designs for new poles, modifications of pole heights, or relocation of poles. Provide the reason PG&E rejected each alternative.

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	Section V(14)			
ALT-02	<b>PEA Checklist:</b> 6.3 Growth Inducing Impacts <b>Information and Criteria List:</b> Section V(14)	<b>PEA:</b> N/A	<b>Growth inducing impacts</b> The PEA does not address growth inducing impacts.	Provide information on growth inducing impacts consistent with the PEA Checklist requirements.