

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 27, 2014

Mr. Greg Parker
Principal Land Planner
Pacific Gas & Electric
1455 E. Shaw Ave, Bag 23
Fresno, CA 93710

Subject: Shepherd Substation Project—Review of Minor Project Modification #1

Dear Mr. Parker,

The California Public Utilities Commission (CPUC) has reviewed Pacific Gas and Electric Company's (PG&E's) proposed Minor Project Modification (MPM) #1 for the approved Shepherd Substation Project (project), provided by email on May 13, 2014. PG&E's proposed actions include the use of five additional work areas located directly adjacent to the power line right-of-way between Tubular Steel Poles 304 and 308, as well as three existing access roads to the proposed work areas and power line right-of-way.. The proposed actions were requested to avoid impacts to seasonal wetlands and minimize heavy construction traffic through a residential driveway.

The proposed actions were reviewed for consistency with the adopted Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the project in satisfaction of the California Environmental Quality Act (CEQA). A review form, including the initial request and supporting documentation, is attached to this letter.

This letter provides documentation that the proposed action is consistent with the IS/MND and no further CEQA review is required. This review does not authorize PG&E to proceed with the work. PG&E must receive a Notice to Proceed from CPUC prior to starting work associated with the power line.

Please contact me or Susanne Heim at Panorama Environmental, Inc. if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Michael E Rosauer".

Michael Rosauer,
CPUC Project Manager

cc: Greg Parker, PG&E
Susanne Heim, Panorama Environmental, Inc.

Mr. Greg Parker

June 27, 2014

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Aaron Lui, Panorama Environmental, Inc.

Attachments: MPM #1 Review Form

Attachments



SHEPHERD SUBSTATION PROJECT

Minor Project Change Review Form

Minor Project Change Type:	Change #:	Determination
Minor Project Modification (MPM)	1	De Minimis Change

Part A: Minor Project Change Summary			
Date of Determination:	Date Request Submitted:	Start Date:	Expected End Date:
6/27/2014	5/13/2014	8/1/2014	12/15/2015
Submitted by:	Organization and Title:	Duration and Work Hours:	
Brooke Langle	Terra Verde, PG&E Environmental Compliance Supervisor	From approximately August 2014 to June 2015 during normal project work hours (6 a.m. to 9 p.m. Monday through Friday, and 7 a.m. to 5 p.m. Saturday and Sunday)	
Location(s): <i>(Describe applicable location(s), address, and/or dimensions)</i>			
<p>From Horseshoe Bend Avenue and North Fowler Avenue to the power line right-of-way (ROW) and between Tubular Steel Pole (TSPs) 304 and 308, and northeast of TSP 302 to East Copper Ave, as shown on the attached map (Attachment 1).</p> <p>The dimensions and approximate acreage of the proposed work areas in order of north to south would be as follows:</p> <ul style="list-style-type: none"> • West of TSP 305: 100 feet x 75 feet (0.17 acre) • East of TSP 306: Less than 200 feet x 100 feet (0.41 acre) • East of TSP 307: 100 feet x 75 feet (0.17 acre) • West of TSP 307: 100 feet x 75 feet (0.17 acre) • West of TSP 308: Less than 150 feet x 50 feet (0.13 acre) <p>The total proposed work area is approximately 1.05 acre</p>			
Proposed Action(s): <i>(List and describe each proposed action)</i>			

PG&E proposes the use of five additional work areas directly adjacent the power line ROW and poles TSPs 305, 306, 307, and 308, as well as three existing unpaved private roads outside of the ROW¹. One road would connect East Copper Ave to TSP 302 from the northwest, and the others would be to the east

¹ On June 24, 2014 PG&E clarified that the original MPM request should include a fifth workspace to the east of TSP 307 that was shown in the cultural survey memo submitted to the CPUC Monitoring Team on June 5. In addition, PG&E clarified that an existing access road from East Copper Ave to TSP 302 would be required to avoid a residential driveway.

SHEPHERD SUBSTATION PROJECT
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of TSPs 306, 307, and 308. One temporary gate would be installed east of TSP 306 and an existing gate would be used east of TSP 306. The ROW would be used to access TSP work areas as described in the Initial Study/Mitigated Negative Declaration (IS/MND) for the project. The proposed work areas and access roads outside of the power line ROW are shown on the attached map. Approximate access routes within the ROW are shown.

Activities at the additional five work areas would be the same as those described in the IS/MND for TSP work areas, and may include the delivery or storage of vehicles, equipment, construction materials required for construction of the power line. Soil removed from TSP foundation excavations may be temporarily stockpiled at the sites. Stockpiling and removal of the soil may cause minor surface disturbance; however, no additional excavation is proposed.

Purpose(s): *(Explain why the proposed action(s) are necessary)*

The proposed work areas and access roads between TSPs 304 and 308 are necessary to avoid impacts to seasonal wetlands adjacent to the aforementioned TSPs and support sufficient workspace for construction personnel to maneuver and store vehicles, equipment, and materials. Seasonal wetlands and water features are shown on the attached map.

The proposed access road northeast of TSP 302 are necessary to avoid heavy construction equipment traveling over a residential driveway.

Part B: Existing Conditions

Current and Adjacent Land Use(s):

The power line and proposed work areas are located on land zoned for agricultural use (described further under Part E) and are primarily undeveloped. Land east of the power line ROW is zoned as Rural Residential and has been developed with low-density single family residences. The closest single family residences are located approximately 400 feet to the west and 250 feet to the east.

The proposed work areas east of TSPs 305, 307, and 308 would be located on land designated as California Annual Grasslands. The work areas west of TSPs 306 and 307 would be located on land designated as Developed.

The proposed work area land and access roads are privately owned.

Has landowner approval been granted? <i>(Describe below)</i>			Landowner:	Date of Approval:	Approval Verified by:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	To be determined	To be determined	Documentation required

Landowner approval is required for use of the work areas and access roads because they are located outside of the PG&E ROW. PG&E is required to provide CPUC with documentation of landowner approval prior to initiating the proposed actions.

Surveys *(List any new survey reports under Part D, attach a copy, and describe relevant survey details under the applicable resource category listed in the Part E)*

**SHEPHERD SUBSTATION PROJECT
Minor Project Change Review Form**

Biological Resources. Were all sites associated with the proposed action(s) surveyed for biological resources with the potential to occur in the area? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season to detect resources? <i>(If not, describe under the applicable resource category in Part E)</i>	<input checked="" type="checkbox"/> Previously Surveyed	<input checked="" type="checkbox"/> Positive
	<input checked="" type="checkbox"/> Survey Attached	<input type="checkbox"/> Negative
	<input type="checkbox"/> N/A	
Cultural Resources. Were all sites associated with the proposed action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?	<input type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input checked="" type="checkbox"/> Survey Attached	<input checked="" type="checkbox"/> Negative
	<input type="checkbox"/> N/A	
Hydrology. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?	<input checked="" type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input type="checkbox"/> Survey Attached	<input checked="" type="checkbox"/> Negative
	<input type="checkbox"/> N/A	

Part C: Permits, Agency Approvals, and Environmental Protection Measures (EPMs) <i>(List any new permits or agency approvals under Part D, attach a copy, and describe relevant details under the applicable resource category listed in Part E)</i>		
Have all required permits, permit amendments/authorizations, or agency approvals been issued by resource agencies with applicable jurisdiction?	<input checked="" type="checkbox"/> Previously Provided	
	<input type="checkbox"/> Authorization Attached	
	<input type="checkbox"/> N/A	
Would the proposed action(s) conflict with permit conditions or agency approvals?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Would the proposed action(s) conflict with project applicant proposed measures, avoidance and minimization measures, or mitigation measures listed in the Initial Study/Mitigated Negative Declaration (IS/MND)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Part D: Attached Materials: <i>(e.g., surveys, maps, photos, memos, agency authorizations, etc.)</i>
<ul style="list-style-type: none"> Attachment 1 – MPM #1 Map with Revisions Attachment 2 - PG&E Request for MPM #1 (with map attachment and survey summary) Attachment 3 - PG&E Response to Comments and Requests for Additional Information (with cultural survey memo attachment)

Complete the IS/MND Consistency Checklist below (Part E) and answer the consistency questions for each resource category. Include a description and justification below each resource category, as necessary. The consistency questions were developed using the CEQA Checklist provided in the IS/MND. Refer to the IS/MND for the details on the project impact evaluation.

Part E: IS/MND Consistency Checklist

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Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	<i>De Minimis</i> Change	Potentially Significant Change	N/A
Aesthetics (e.g., damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)? <i>Previous IS/MND evaluation: Less than Significant with Mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions would be consistent with construction activities evaluated in the IS/MND and would not involve the construction of any new permanent structures.				
Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)? <i>Previous IS/MND evaluation: Less than Significant with Mitigation</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed work area west of TSP 305 and the previously approved pole work area are both located on land subject to a Williamson Act contract. In addition, the proposed work areas west of TSP 305, 307, and 308 are located on land designated by the Farmland Mapping and Monitoring Program as Farmland of Local Importance. The additional work areas would be temporary and consistent with impacts analyzed in the IS/MND. Following construction, temporary work areas would be restored, as needed, and returned to preconstruction conditions.				
Air Quality and Greenhouse Gases (e.g. produce additional emissions, or expose sensitive receptors to additional pollutants)? <i>Previous IS/MND evaluation: Less than Significant with Mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions do not include the additional use of vehicles or equipment, or involve greater dust generation, than evaluated in the IS/MND.				
Biological Resources (e.g., cause an adverse effect to sensitive or special-status species, or impact riparian, wetland, or any other sensitive habitat, or conflict with local policies or ordinances protecting biological resources)? <i>Previous IS/MND evaluation: Less than Significant with Mitigation</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed work areas were surveyed for special-status plants and animals in preparation of the IS/MND and none were identified. Additional surveys will be conducted prior to construction as required by applicable mitigation for the project. Should any state or federally listed species be identified at that time, PG&E has authorization from the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) for impacts to special-status plants and animals covered under the San Joaquin Valley Habitat Conservation Plan.				

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Part E: IS/MND Consistency Checklist				
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	<i>De Minimis</i> Change	Potentially Significant Change	N/A
<p>Terra Verde conducted a preconstruction spring botanical survey on May 1, 2014, as required by MM Biology-1. One special-status plant species was identified. Spiny-sepaled button-celery (<i>Eryngium spinosepalum</i>) was discovered in abundance from TSP location 302 to 309, which is listed as 1B.2 by the California Native Plant Society Inventory of Rare and Endangered Plants. The plant species is not state or federally listed. Impacts to this species were addressed in the IS/MND and determined to be less than significant with implementation of MM Biology-1. The proposed actions would replace and increase temporary work areas described in the IS/MND in order to avoid seasonal wetlands; however, the increases would be minor and impacts to spiny-sepaled button-celery would not be greater than previously evaluated in the IS/MND.</p> <p>MM Biology-1 states, "if sensitive plant species are present, AMM 12, AMM 13, and AMM 14, shall be implemented." PG&E would implement AMM 12 and AMM 13 in order to mark and avoid the populations until after the plant has senesced. Where the seed bank may be impacted during construction activities, PG&E would implement AMM 14, which requires that the top four inches of topsoil to be salvaged prior to excavation and replaced once the work is completed.</p>				
Cultural Resources (e.g., cause adverse change to a historical or archeological resource)? <i>Previous IS/MND evaluation: Less than Significant with Mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The proposed work areas west of the power line ROW were surveyed in preparation of the IS/MND. The work area east of the ROW was surveyed by PG&E senior archaeologist Wendy Nettles on April 28, 2014. A memo summarizing the survey is included with PG&E's response to comments (Attachment 3). No resources were identified at or adjacent to the proposed work areas.</p>				
Paleontological Resources (e.g., cause adverse change to a paleontological resource)? <i>Previous IS/MND evaluation: Less than Significant with Mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The proposed actions do not involve subsurface excavation and would not change paleontological resource impacts evaluated in the IS/MND.</p>				
Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)? <i>Previous IS/MND evaluation: Less than Significant</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The proposed actions would not change geology and soil impacts evaluated in the IS/MND.</p>				
Hazards and Hazardous Materials (e.g., create or increase the exposure of people or structures to hazardous materials or wildland fires, involve the use of additional hazardous materials or equipment, or interfere with an	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SHEPHERD SUBSTATION PROJECT
Minor Project Change Review Form

Part E: IS/MND Consistency Checklist				
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	De Minimis Change	Potentially Significant Change	N/A
adopted emergency plan)? <i>Previous IS/MND evaluation: Less than Significant with Mitigation</i>				
The proposed actions would not change hazards to the public that were evaluated in the IS/MND. No hazardous materials would be stored at the proposed work areas.				
Hydrology (e.g., degrade water quality, discharge waste or sediment, deplete groundwater, alter the existing drainage pattern, create additional runoff water or polluted runoff, place structures in a 100-year flood hazard area, or expose people or structures to a significant risk involving flooding)? <i>Previous IS/MND evaluation: Less than Significant with Mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions would not change hydrology impacts evaluated in the IS/MND, and are necessary to avoid impacts to hydrologic features. Seasonal wetland boundaries will be flagged and fenced off for avoidance. PG&E will follow all applicable avoidance and minimization measures included in the IS/MND.				
Land Use and Planning (e.g., conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)? <i>Previous IS/MND evaluation: Less than Significant</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions would not change land use and planning impacts evaluated in the IS/MND.				
Mineral Resources (e.g., result in the loss of availability of a known mineral resource or mineral resource recovery site)? <i>Previous IS/MND evaluation: No Impact</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions would not change mineral resource impacts evaluated in the IS/MND.				
Noise (e.g., expose sensitive receptors to additional noise or vibration)? <i>Previous IS/MND evaluation: Less than Significant</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed work areas would shift TSP construction activities between 50 and 100 feet closer to residences adjacent to TSPs 305, 306, 307, and 308. The proposed access roads from Horseshoe Bend Avenue would pass through a private property and come within approximately 40 feet of a residence to the north. The access road from North Fowler Avenue would pass within approximately 60 feet of residences to the north and south. The proposed actions would reduce the distance between residences				













SHEPHERD SUBSTATION PROJECT
Minor Project Change Review Form

Part E: IS/MND Consistency Checklist				
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	De Minimis Change	Potentially Significant Change	N/A
and the pole work areas for TSPs 305, 306, 307, and 308. Construction activities and noise levels generated at the workspaces would be consistent with power line construction analyzed in the IS/MND. No additional sensitive receptors would be impacted by the action and the duration of construction at each location would be consistent with the duration analyzed in the IS/MND (approximately 1 week). Temporary construction noise impacts would remain less than significant with implementation of APMs Noise-1 through Noise-7. PG&E would notify residents near heavy construction noise prior to commencing construction as required by APM Noise-7.				
Population and Housing (e.g., induce population growth or displace housing)? <i>Previous IS/MND evaluation: No Impact</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions would not change population and housing impacts evaluated in the IS/MND.				
Public Services (e.g., result in adverse impacts to government facilities that provide public service, such as fire protection, police protection, schools, and parks)? <i>Previous IS/MND evaluation: No Impact</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions would not change public service impacts evaluated in the IS/MND.				
Recreation (e.g., increases the use of, or cause adverse effects to, parks or other recreational facilities)? <i>Previous IS/MND evaluation: Less than Significant</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions would not change recreation impacts evaluated in the IS/MND.				
Transportation and Traffic (e.g., increase traffic congestion or degrade performance of the circulation system, taking into account all modes of transportation, or increase hazards due to a design feature)? <i>Previous IS/MND evaluation: Less than Significant with Mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions would not change transportation and traffic impacts evaluated in the IS/MND.				
Utilities and Service Systems (e.g., result in construction of new, or expansion of existing, water facilities, stormwater drainage facilities, require additional water entitlements, or creation of new solid waste disposal needs)? <i>Previous IS/MND evaluation: Less than Significant</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions would not change utilities and service system impacts evaluated in the IS/MND.				

Shepherd Substation Project Minor Project Modification #1

Date: 6/24/2014

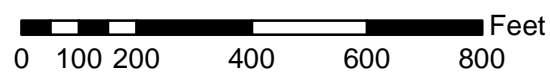
Project Components

-  BUSS
-  TAKE-OFF TSP
-  TSP
-  Drilling Location
-  Existing Paved Access Road
-  Existing Unpaved Access Road
-  Overland Access Route
-  MPM #1 Additional Work Areas
-  Pole Work Area
-  Pull-and-tension Site
-  Substation
-  Proposed ROW

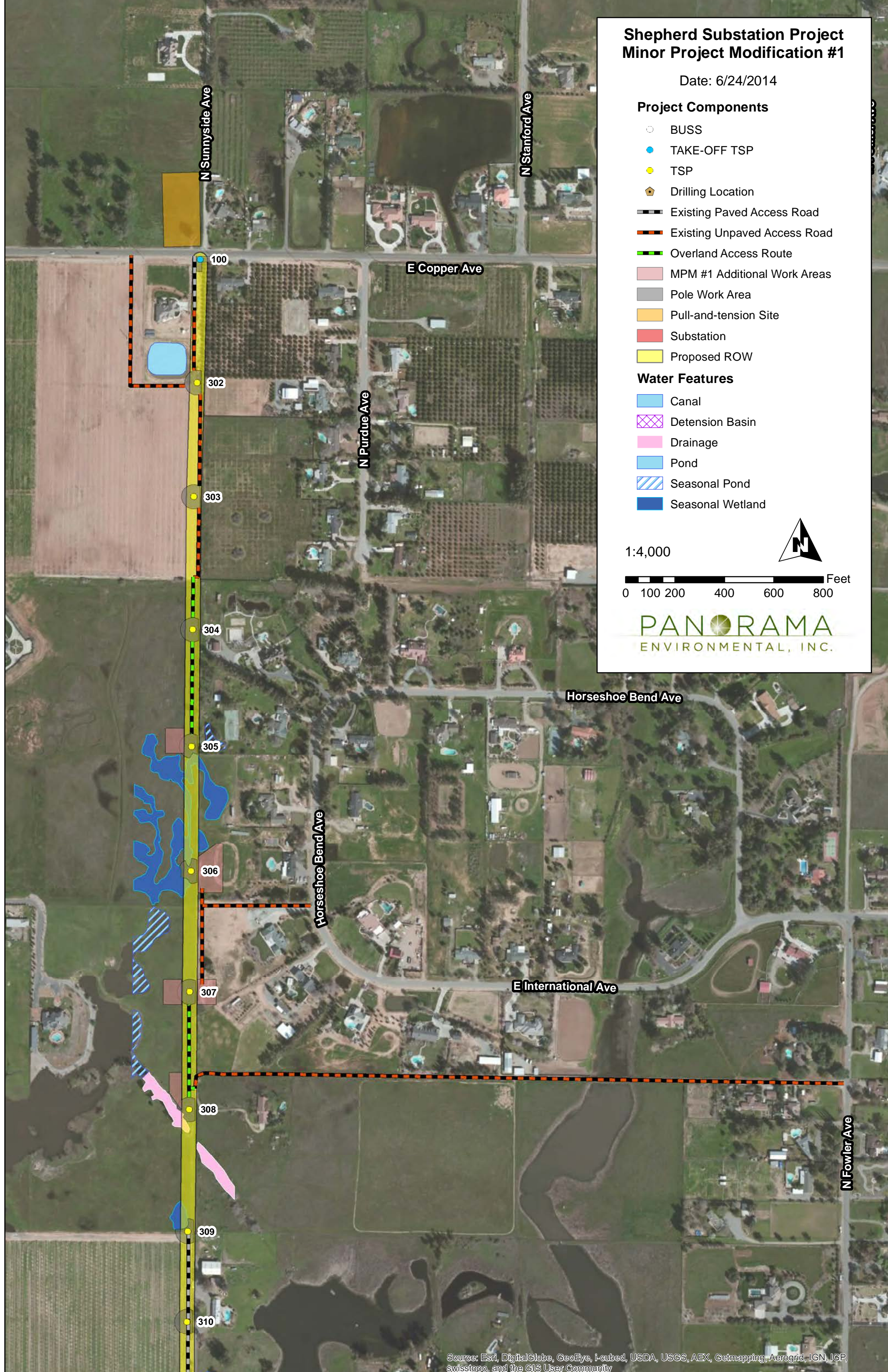
Water Features

-  Canal
-  Detention Basin
-  Drainage
-  Pond
-  Seasonal Pond
-  Seasonal Wetland

1:4,000



PANORAMA
ENVIRONMENTAL, INC.



Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form



Proposed Minor Project Change Type:	Request #:
Minor Project Modification (MPM)	1

Part A: Proposed Minor Project Change Summary			
Date Submitted:	Requested Approval Date:	Start Date:	Expected End Date:
5/13/2014	6/25/2014	7/15/2014	12/15/2015
Submitted by:	Organization and Title:	Duration and Work Hours:	
Brooke Langle	Terra Verde - Environmental Compliance Supervisor	Use of the additional access, turnarounds, and temporary work locations would occur throughout the project duration.	
Contact Information:			
blangle@terraverdeweb.com ; (805) 896-5479			
Location(s): <i>(Describe applicable location(s), address, and/or dimensions)</i>			
Four project turnaround locations located between proposed Tubular Steel Pole (TSP) 304 and 308 (refer to Figure 1).			
Proposed Action(s): <i>(List and describe each proposed action)</i>			
<p>Additional project turnaround areas will be used for vehicle turnaround and temporary workspaces as needed. Proposed activities are not anticipated to cause ground disturbance; actions may include:</p> <ul style="list-style-type: none"> • Vehicle/equipment access and turnaround • Vehicle/equipment parking and staging • Material delivery and staging 			
Purpose(s): <i>(Explain why the proposed action(s) are necessary)</i>			
<p>The additional project turnaround areas are necessary to avoid nearby seasonal wetlands, accommodate project vehicle access to TSP workspaces, and provide project right-of-way (ROW) turnaround needs. Seasonal wetlands, as delineated on March 17, 2013, south of TSP 304 and north of TSP 308 prevent sufficient clearance on existing ROW roads for large and oversize vehicles accessing TSPs 305, 306, 307, and 308. Four turnarounds are necessary to maneuver around the seasonal waterbodies and accommodate the new access paths for each location.</p>			

SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form



Part B: Existing Conditions

Current and Adjacent Land Use(s):

The four turnaround locations are located adjacent to PG&E's existing distribution line alignment and directly adjoin the existing ROW between Copper Avenue and Behymer Avenue. Land immediately west of the proposed alignment is zoned Agriculture and is largely undeveloped, with two single family residences approximately 500 feet away from the proposed areas. Land to the east, zoned Rural Residential, is developed with low-density, single family residences. Habitat within three of four additional turnaround areas is mapped as "California Annual Grasslands." The fourth location, on the east side of the alignment, is mapped as "Developed."

Has landowner approval been granted? *(Describe below)*

Landowner:

Date of Approval:

Approval Verified by:

Yes

No

N/A

Multiple

PG&E will secure landowner approvals prior to use of the access points and turnaround locations. Discussions with landowners are currently ongoing. Per Land Use and Planning, and Noise Mitigation Measures, property owners and residents adjacent to planned construction will be appropriately notified no less than 30 days prior to the start of activity.

Surveys *(List any new survey reports under Part D, attach a copy, and describe relevant survey details under the applicable resource category listed in the Part E)*

Biological Resources. Were all sites associated with the proposed action(s) surveyed for biological resources with the potential to occur in the area? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season to detect resources? *(If not, describe under the applicable resource category in Part E)*

Previously Surveyed

Positive

Survey Attached

Negative

N/A

Cultural Resources. Were all sites associated with the proposed action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?

Previously Surveyed

Positive

Survey Attached

Negative

N/A

Hydrology. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?

Previously Surveyed

Positive

Survey Attached

Negative

N/A

SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form



Part C: Permits, Agency Approvals, and Environmental Protection Measures (EPMs) (List any new permits or agency approvals under Part D, attach a copy, and describe relevant details under the applicable resource category listed in Part E)

Have all required permits, permit amendments/authorizations, or agency approvals been issued by resource agencies with applicable jurisdiction?	<input checked="" type="checkbox"/> Previously Provided
	<input type="checkbox"/> Authorization Attached
	<input type="checkbox"/> N/A
Would the proposed action(s) conflict with permit conditions or agency approvals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Would the proposed action(s) conflict with project applicant proposed measures, avoidance and minimization measures, or mitigation measures listed in the Initial Study/Mitigated Negative Declaration (IS/MND)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Part D: Attached Materials: (e.g., surveys, maps, photos, memos, agency authorizations, etc.)

Figure 1: New Work Areas

Survey memo for additional cultural and spring botanical surveys is attached. Additional preconstruction biological surveys will be conducted prior to this work occurring.

Part E: IS/MND Consistency

Impact Question	No Change	De Minimis Change	Potentially Significant Change	N/A
Would the Proposed Action Result in a New Impact, or Increase the Severity of an Impact Previously Analyzed in the IS/MND? Provide information on any new impacts or additional impacts. (Refer to the IS/MND for the details on the project impact evaluation.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Consistent with Section 2.5 in the Mitigated Negative Declaration (MND), project activities proposed to occur within the new project areas include those described in Structure Assembly and Erection, Conductor Stringing, Collocation of Distribution Line, and Construction access. The new work area limits would be viewed as an extension of the project ROW for the duration of the project and all applicable mitigation measures would be implemented during construction. Access to the new turnarounds would occur from local and existing unpaved roads, as described in the MND, section 2.5.3.

Biological Resources: The locations of the additional turnaround areas were surveyed as part of the MND analysis, Figure 3.5-1, and will be included in preconstruction surveys. A wetland exists nearby but will be avoided in accordance with projects requirements. Protection measures for sensitive plant species will be followed at the western locations supporting spiny-sepaled button-celery.


SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form



Part E: IS/MND Consistency				
Impact Question	No Change	<i>De Minimis</i> Change	Potentially Significant Change	N/A
<p>Cultural Resources: The locations of the turnaround areas were surveyed by PG&E senior archaeologist Wendy Nettles with negative results. No impacts to cultural resources would occur.</p> <p>Hydrology: The locations of the additional turnaround areas were surveyed as part of the MND analysis, Figure 3.5-2; seasonal wetlands would be avoided per project Mitigation Measures.</p>				

119°41'40"W 119°41'30"W 119°41'20"W 119°41'10"W









0 125 250 500 Feet

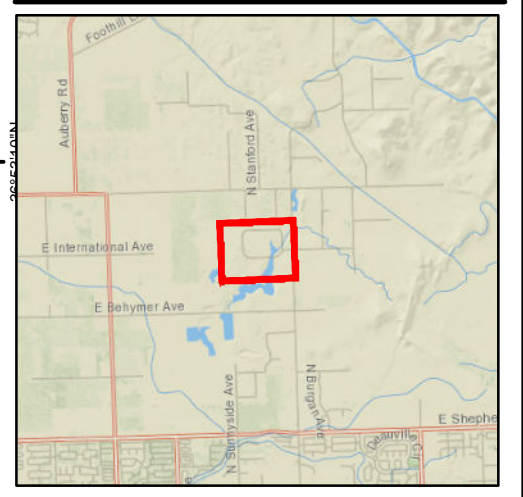
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**Shepherd Substation
Transmission Project**

Temporary Work Areas

DRAFT: 4/24/2014 - 4:14:31 PM

-  New Transmission Line
-  New Pole
-  Access Roads
-  50' Right-of-Way
-  New Temporary Work Area
-  Wetland delineated 3-17-2013



119°41'40"W 119°41'30"W 119°41'20"W 119°41'10"W



May 13, 2014

Susanne Heim
Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco California 94111

RE: Pacific Gas and Electric Company's Shepherd Substation Project - **Minor Project Modification Request #1** – Supporting Information for Cultural and Botanical Resources

Dear Susanne,

This memorandum is being provided to summarize the additional archaeological survey and spring botanical surveys conducted on April 28, 2014 and May 1, 2014 respectively. The surveys were conducted in support of Minor Project Modification (MPM) #1 and in accordance with the conditions of the Mitigated Negative Declaration prepared by the California Public Utilities Commission (CPUC) for the Shepherd Substation Project.

The MPM #1 will provide alternative access and turnaround areas that avoid impacts to seasonal wetlands (see Figure 1). The majority of the access and turnaround areas have been previously surveyed for both biological and cultural resources; however, the eastern portions of the access and turnaround areas were not included in the original cultural resources surveys.

Cultural Resources

On April 28, 2014 Senior Archaeologist Wendy Nettles (PG&E) conducted a pedestrian survey of the areas identified in MPM #1 that had not been previously surveyed. No cultural resources were observed; therefore use of the access roads and turnarounds identified in MPM #1 are not anticipated to have any impact to cultural resources.

Botanical Resources

As required by MM Biology-1, Terra Verde Environmental Consulting (Terra Verde) botanists conducted a spring botanical survey of the project work areas and the areas included in MPM #1, plus a 200-foot buffer around each. Reference populations were located and visited prior to the surveys to confirm blooming, where feasible.

One special-status plant species, spiny-sepaled button-celery (*Eryngium spinosepalum*), was discovered in abundance from future pole location 302 to 309. This plant is listed by the California Native Plant Society Inventory of Rare and Endangered Plants as 1B.2. Mitigation measures that address sensitive plants, including AMM-12 and AMM-13, will



be followed for the turnaround areas. Specifically, these areas will be marked for exclusion and avoided until after the plant has senesced. Excavation is not planned in the turnaround areas, but if excavation becomes necessary, AMM-14 will also be implemented (i.e., top four inches of topsoil will be salvaged prior to excavation and replaced after earthwork is completed).

With implementation of the above measures, no new or increased levels of impacts to resources would result from MPM #1.

Please let me know if you need any additional information.

Sincerely,

A handwritten signature in black ink that reads "Brooke Langle".

Brooke Langle
Principal Biologist/Environmental Compliance Supervisor



June 5, 2014

Aaron Lui
Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco California 94111

RE: Pacific Gas and Electric Company's Shepherd Substation Project – **Response to Panorama's Comments on Minor Project Modification #1 Request**

Dear Aaron,

This letter details Pacific Gas and Electric's (PG&E) response to comments and requests for additional information from your email on May 16, 2014.

Proposed Activities/Locations

COMMENT: Work Space Classification. The additional four work spaces are described as turnaround areas that may be used for staging. Please describe all staging type activities proposed at the locations. Would refueling, storage of hazardous materials, overnight storage of vehicles and equipment, or concrete washout occur at these locations?

RESPONSE: The activities proposed at these locations would be the same as those that would occur for all the TSP work on this aspect of the project. As such, all applicable avoidance and mitigation measures will be followed to ensure no significant or new impacts occur. Activities that are anticipated are turnaround, materials storage (non-hazardous), and temporary spoil stockpile if needed. Storage of hazardous materials and refueling would not occur in close proximity to seasonal wetlands. Any concrete washout will occur within self-cleaning trucks or at a location approved by the Lead Environmental Inspector.

COMMENT: Overland Access Routes. Please identify all overland access routes within the Power Line ROW from Perrin Rd to Copper Ave to ensure clarity that routes in the ROW avoid seasonal wetlands and water features as required by mitigation.

RESPONSE: The purpose of this request is to ensure avoidance of the seasonal wetlands. As required, the seasonal wetland boundaries will be flagged and fenced off for avoidance. Travel will be along the transmission line ROW with access from North Sunnyside, Behymer, and Copper Avenue, as well as the routes shown MPM #1.

COMMENT: Additional Work Area Dimensions. Please provide the dimensions for each work space.

RESPONSE: The dimensions are shown on the figure submitted with MPM #1.



COMMENT: TSP Work Areas. Please identify all TSP work area limits, including boundaries adjacent to wetlands where exclusion fencing would be installed per mitigation.

RESPONSE: The work areas around each TSP are as described in the Mitigated Negative Declaration (MND) – 100 feet in diameter centered on the TSP location. Workspace will be reduced or shifted into the spaces outlined in MPM #1 in order to avoid seasonal wetlands as required. As noted above, wetland boundaries will be flagged and fenced prior to construction.

COMMENT: Potential Excavation. Excavation at the additional workspaces is described as not anticipated in the MPM request, and the survey memo states: "if excavation is necessary, AMM 14 will also be implemented..." Please describe what excavation activities could become necessary.

RESPONSE: No excavation is anticipated but the intent is to keep the description flexible in order to avoid future project changes. If spoils need to be temporary stockpiled in these areas, then a minor amount of earth disturbance will occur in order to load them into a truck for disposal. The surface may be disturbed, but true excavation is not expected.

COMMENT: Site Preparation. Please describe any preparation of the work areas. Would vegetation clearing or mowing be required?

RESPONSE: Vegetation clearing or mowing is not anticipated at this time. However, if deemed necessary for fire safety or other constraints, clearing or mowing may occur. Any clearing or mowing would occur after the required biological surveys are conducted.

Biology and Hydrology

COMMENT: Special-Status Plant Requirements. The survey memo identified an abundance of spiny-sepaled Button-celery (*Eryngium spinosepalum*) from TSP 302 to 309. Please ensure this population is mapped per MM Biology-1 and included in resource maps provided to the CPUC Monitoring Team prior to work in the area. Please also include a description of topsoil salvaging practices and agency consultation requirements for TSP foundation excavation work per AMM 14.

RESPONSE: PG&E will follow the measures in the MND for this sensitive plant species. This species is not a "Covered" species by PG&E's San Joaquin Valley Habitat Conservation Plan nor is it federally or state listed. Thus, no agency consultation is required. Mapped data will be shared with the CPUC prior to work occurring in this area.

COMMENT: Wetland Delineation. The MPM and attached map describe a March 17, 2013 Wetland Delineation. We do not have any delineation report on file for that date. Please provide the wetland delineation report, and describe any differences from the previous delineations on March 18 and August 3, 2011 that are referenced in the IS/MND (Page 3.9-1).

RESPONSE: The March 17, 2013 date is an error. The wetland delineation referred to is the same one referenced in the IS/MND.



COMMENT: Other Water Features. Would overland routes cross any hydrologic feature or drainage?

RESPONSE: No

Cultural

COMMENT: Cultural Resource Survey. Please provide a complete cultural resource survey memo or letter describing the methods and results from the cultural resource specialist who performed the survey (Wendy Nettles, PG&E).

RESPONSE: Please see requested memo attached.

Noise, Traffic, and Land Use

COMMENT: Use of Private Roads. Please provide landowner approval documentation for the use of private roads identified on the MPM map attachment. Please describe the work hours and number of vehicles that would access each road.

RESPONSE: The work hours and level of project traffic will be the same as the other TSP sites and in compliance with the MND. PG&E needs to ensure this change is approved prior to gaining landowner approvals. No work or access will occur until the landowner approvals are secured by PG&E.

Please let me know if you need any additional information.

Sincerely,

A handwritten signature in black ink that reads "Brooke Langle". The signature is fluid and cursive.

Brooke Langle
Principal Biologist/Environmental Compliance Supervisor

Cc: Michael Rosauer, California Public Utilities Commission
Susanne Heim, Panorama
Greg Parker, PG&E
Wendy Nettles, PG&E

Attachment: Cultural resources memo dated May 23, 2014



Project Name: Shepherd Substation Project, Minor Project Modification #1		Date: May 23, 2014
PM Number: 30744145	Line of Business: Electric Transmission Program: Substation Capacity	
Prepared for: Greg Parker, Principal Land Planner	Prepared by: Wendy M. Nettles, PG&E Senior Cultural Resource Specialist	

PROJECT DESCRIPTION AND LOCATION

PG&E proposes to construct and operate the Shepherd Substation, a 115/21-kV electrical substation with three 45-Megavolt Ampere (MVA) transformers. A 115-kV overhead power line interconnection would be constructed to link the substation to the existing power grid. The new 115-kV power line would be approximately 1.5 miles long. The existing distribution line located north of the substation would be extended to E. Copper Avenue as under-build along the new 115-kV power line. Two new 21-kV distribution lines and one 12-kV distribution line would be constructed south of the substation. The new distribution circuits would primarily be underground with a portion above ground using an existing distribution line alignment.

Cultural studies were conducted in for the project in 2011. One historical resource, the Enterprise Canal, was identified in the project area, but it was determined that the project would not cause a substantial adverse change in the significance of this historic resource as defined in Section 15064.5.

This project received a Permit to Construct (PTC) from the California Public Utilities Commission (CPUC) in May 2013. Construction began in February 2014. Subsequently, it was determined that additional project turnaround areas/temporary work spaces were needed between Tubular Steel Pole (TSP) 304 and 308 to avoid seasonal wetlands. The turnaround locations are located adjacent to PG&E's existing distribution line alignment and directly adjoin the existing ROW between Copper Avenue and Behymer Avenue in a rural residential area. The turnaround areas that are located west of the alignment were surveyed during the original project study. The turnarounds on the eastern side of the alignment were not surveyed, due to access issues. This assessment was completed to identify cultural resource constraints in the two eastern turnaround sites.

County: Fresno	Quad: Friant	Property Ownership: Private
Legal Description: Both Turnarounds: T12S, R21E, Section 16		Lat/Long: North Turnaround Area: 36.532003, -119.413433 South Turnaround Area: 36.531464, - 119.413427

REGULATORY CONTEXT

Federal (NEPA/Section 106) <input type="checkbox"/>	State (GO131D) <input checked="" type="checkbox"/>	None <input type="checkbox"/>
Applicable Agencies: CPUC		
Permits Required/Issued: None		

DESKTOP / LITERATURE REVIEW

Records Search Results:		
Date: 2010 (this area was included in the original project records search)	Search Radius: ½-mile around project site. This report focuses only 0.5 mile from turnarounds	Conducted by: Everett Bassett, Transcon
Resources within the API: 0		
Resources within the Records Search area: 0		
Studies within the API: 1		
Studies within the Records Search area: 2		
% API previously studied: 100%		
Eligibility Status of Sites within API (National, State or Local): No resources were identified in the study area		

Both turnaround sites are within the archaeological survey area covered under study FR-001084 (Wren 1992).

No resources were identified in that study.

Wren, Donald G.

1992 *An Archaeological Survey for Susan Mortensen Variance Application No. 3353-EA3810.*
(FR-001084).

Other Sources Consulted:

- Examination of the available environmental resources information from PG&E including: MapGuide; the Environmental Screening Checklist; aerial photographs; and construction plans;
- Google Earth and Google Maps.
- Handbook of North American Indians, Volume 8: California, Southern Valley Yokuts Chapter (Wallace 1978)
- National Register of Historic Places (non-confidential listings; built-environment listings)
- California Historic Resources Database
- Historic Spots in California (Fifth Edition, revised by D. Kyle 2002)
- California Place Names (Gudde 1949; revised Bright 1996)

Native American Heritage Commission (NAHC) Sacred Lands Search: Yes No

The original project NAHC consultation included this area. The SLF search was negative.

Risk Assessment:

Nearest Water Source: Seasonal drainages (more active prehistorically; historical agricultural activity has made these very intermittent)

Landform Age: Both areas: Pliocene to Holocene

Depositional Environment: Quaternary alluvium

Slope:
0%

Known Resources/Ethnographic Places in the Area: 12 historical resources, all outside of the current study area; no prehistoric resources

Potential for Prehistoric Resources (Surface/Buried): The presence of alluvium increases the potential that there are deeply buried sites in this area and lowers the potential for older prehistoric sites.

Potential for Historic Resources: Low; this area is on an historical boundary between agricultural fields (it is on a section line).

Amount of Project Ground Disturbance: Minimal (Volume: <5 m³; Area: <100 m²)

This project involves a very minimal amount of ground disturbance in order to stage equipment or turn vehicles around. No excavation will occur.

Risk (Prehistoric Resources): Low

Risk (Historic Resources): Low

Based on the results of the desktop/literature review, there is a low risk of encountering prehistoric and historic-era resources during project implementation. According to the SSJVIC, these areas have been 100% covered, and no resources were identified. Although several historic-era resources have been recorded in the area, they are all more than one mile away. None of these resources are at or adjacent to the project poles or along the access route to these poles. No areas of high cultural risk were identified in the desktop/literature review.

CONSULTATION

Native American:

The following tribes were consulted in the original project consultation.

- Big Sandy Rancheria of Mono Indians
- Cold Springs Rancheria of Mono Indians
- North Fork Mono Tribe
- Table Mountain Rancheria
- Dumma Wo-Wah Tribal Government
- Traditional Choinumni Tribe
- Choinumni Tribe; Choinumi/Mono
- Kings River Choinumni Farm Tribe

Agency: N/A

- Dumma Tribal Government
- The Choinumni Tribe of Yokuts
- Sierra Nevada Native American Coalition

The only community to express an interest in the project was the Table Mountain Rancheria of Friant, California, which requested a copy of the cultural resources inventory.

Other: N/A

FIELD REVIEW

Field Methods:

Wendy Nettles, M.A., R.P.A., PG&E Senior Cultural Resource Specialist did a cursory examination of the areas on April 18. Visibility was fair to good. Access to private properties had not been granted, so the areas were examined from the fenceline.

Survey Results:

The areas to the east of the alignment are in private backyards where considerable grading of soil has occurred. A large push pile in the northern most turnaround is likely the result of the excavation of a near-by pond by the landowner. The homes in this area were constructed between 1984 and 1992. There was no indication of historic or prehistoric cultural resources in any of the turnarounds, which supports Wren's 1992 survey results.

SUMMARY & RECOMMENDATIONS

The desktop/literature review and records search did not identify any resources in the Minor Project Modification area. No further cultural work is recommended. The Inadvertent Discovery Protocol and Human Remains Protocol as provided in the Tear Sheet shall be followed if archaeological resources or human remains are encountered during project implementation.

ATTACHMENTS

A: Figure 1 Location Map and Record search results



Project Name: Shepherd Substation Project, Minor Project Modification #1	Date: May 23, 2014
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PM Number: 30744145	Line of Business: Electric Transmission Program: Substation Capacity
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Prepared for: Greg Parker, Principal Land Planner	Prepared by: Wendy M. Nettles, PG&E Senior Cultural Resource Specialist
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SUMMARY

The desktop/literature review and records search did not identify any resources at or adjacent to either of the turnaround areas. The Inadvertent Discovery Protocol and Human Remains Protocol as provided in the Tear Sheet shall be followed if archaeological resources or human remains are encountered during project implementation.

CULTURAL RESOURCE PROTECTION MEASURES

Location-Specific Protocol

None

Inadvertent Discovery Protocol

If any cultural resources are located during project activities, Best Management Practice 25 (Environmental Services Procedure P-002) should be implemented, which includes stopping all work in the vicinity of the discovery and immediately notifying a PG&E Cultural Resources Specialist. Archaeological and historic-period resources in the region may include:

- **Archaeological materials:** flaked stone tools (projectile point, biface, scraper, etc.) and debitage (flakes) made of chert, obsidian, etc., groundstone milling tools and fragments (mortar, pestle, handstone, millstone, etc.), faunal bones, fire-affected rock, dark middens, housepit depressions and human interments.
- **Historic-era resources:** may include, but are not limited to, small cemeteries or burial plots, cut (square) nails, containers or miscellaneous hardware, glass fragments, cans with soldered seams or tops, ceramic or stoneware objects or fragments, milled or split lumber, earthworks, feature or structure remains and trash dumps.

Human Remains Protocol

Section 7050.5 of the California Health and Safety Code (CHSC) states that it is a misdemeanor to knowingly disturb a human burial. In keeping with the provisions provided in 7050.5 CHSC and Public Resource Code 5097.98, if human remains are encountered (or are suspected) during any project-related activity:

1. Stop all work within 100 feet;
2. Immediately contact a PG&E Cultural Resource Specialist (CRS), who will notify the county coroner;
3. Secure location, but do not touch or remove remains and associated artifacts;
4. Do not remove associated spoils or pick through them;
5. Record the location and keep notes of all calls and events; and
6. Treat the find as confidential and do not publically disclose the location.

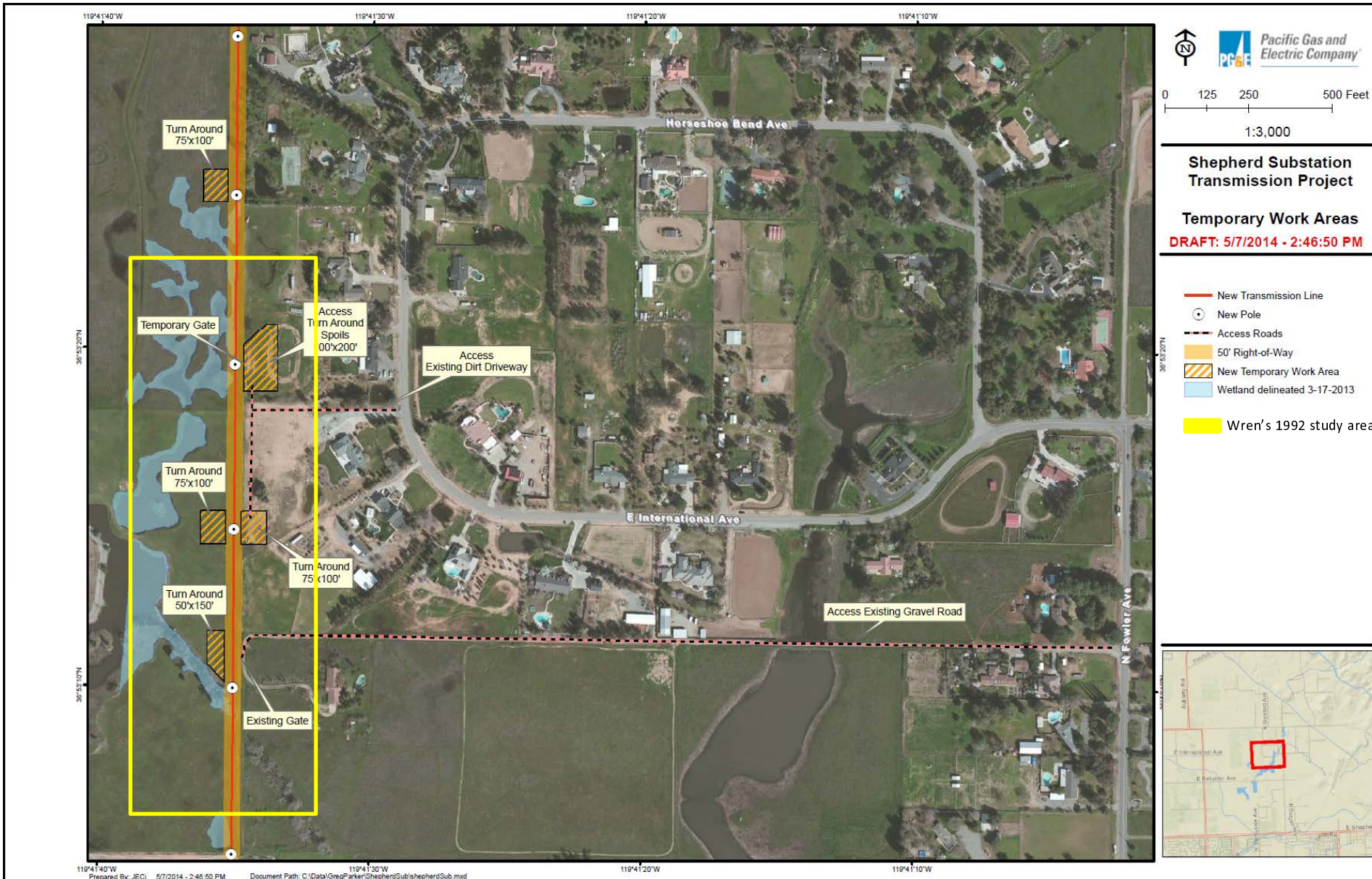
Inadvertent Discovery Contact



Upon discovery of cultural resources or suspected human remains, contact the following individual immediately:

Wendy Nettles, PG&E, Senior Cultural Resources Specialist
 559-263-5834 office
 559-513-9481 cell
 WMN3@pge.com

ATTACHMENTS








A: Figure 1 (Environmental Setting)





 Pacific Gas and Electric Company

0 125 250 500 Feet
 1:3,000

**Shepherd Substation
Transmission Project**
Temporary Work Areas
DRAFT: 5/7/2014 - 2:46:50 PM

-  New Transmission Line
-  New Pole
-  Access Roads
-  50' Right-of-Way
-  New Temporary Work Area
-  Wetland delineated 3-17-2013
-  Wren's 1992 study area

