



SHEPHERD SUBSTATION PROJECT

Minor Project Change Review Form

Minor Project Change Type:	Change #:	Determination
Minor Project Modification (MPM)	2	De Minimis Change

Part A: Minor Project Change Summary			
Date of Determination:	Date Request Submitted:	Start Date:	Expected End Date:
8/6/2014	7/1/2014	8/11/2014	12/31/2015
Submitted by:	Organization and Title:	Duration and Work Hours:	
Brooke Langle	Terra Verde, PG&E Environmental Compliance Supervisor	Work would occur during standard construction work hours (i.e., between 6 am and 9 pm weekdays and 7 am and 5 pm on weekends)	
Location(s): <i>(Describe applicable location(s), address, and/or dimensions)</i>			
<p>Tubular Steel Pole (TSP) Relocation. Four TSPs (poles 315, 319, 320, and 321 on Attachment B) between the Salt Creek Substation and Behymer Avenue will be relocated to an area within PG&E's Fresno County franchise¹.</p> <p>Temporary Shoo-fly. An approximately 0.5-mile shoo-fly (alternate distribution line) corridor approximately 50 feet east of the power line from the Shepherd Substation to Behymer Avenue.</p> <p>Permanent Wood Poles. Distribution and interset pole locations east of the power line between Shepherd Substation and Behymer Avenue.</p> <p>Distribution Connections. Overhead and underground distribution connection points to properties east of a proposed shoo-fly corridor (between Perrin Avenue and Behymer Avenue) and west of TSP 308, as shown on Attachment B.</p> <p>The described locations are shown on the attached maps (Attachment B).</p>			
Proposed Action(s): <i>(List and describe each proposed action)</i>			

PG&E proposes the following actions described below, by component.

TSP Relocation. Relocate the foundation and overhead conductor position of four TSPs (poles 315, 319, 320, and 321 on Attachment B) up to 19 feet to the east of the locations described in the IS/MND. The TSP relocation will move the TSPs from land owned by the Fresno Metropolitan Flood Control District

¹ PG&E renamed the TSP locations following preparation of the Initial Study/Mitigated Negative Declaration (IS/MND). TSP numbers from the IS/MND are used in this review form. PG&E used the same numbers on the attached maps, and the new numbering system in the MPM request. A TSP location name key is attached (Attachment G).

SHEPHERD SUBSTATION PROJECT
Minor Project Change Review Form

(FMFCD) to Fresno County franchise (franchise) where an existing distribution line is located. The action would include the installation of non-conductive fencing panels or gates at approximately 7 locations where TSPs would be installed adjacent to existing fences. Power line construction activities would remain the same as described in the IS/MND.

Temporary Shoo-fly. Install a temporary shoo-fly from the Shepherd Substation to Behymer Avenue, approximately 50 feet east of the power line. The shoo-fly would be comprised of approximately 10 wood poles with distribution conductor. The shoo-fly would remain in place until the power line and distribution underbuild are constructed, which is anticipated to be no later than December 2015.

Installation and removal of the shoo-fly would include the following actions:

- Accessing the shoo-fly corridor through the use of existing private roads, driveways, and overland routes through graded pastures and fields. Off road travel is expected for three poles.
- Trim trees along the shoo-fly corridor and clear vegetation at work areas, as needed. Anticipated tree trimming would occur adjacent to TSPs 314, 315, and 320 on Appendix B, and immediately south of Behymer Avenue in the shoo-fly corridor.
- Auger temporary wood pole holes approximately 10 feet deep. Holes would be backfilled with salvaged topsoil or clean fill material following pole removal. Pole workspaces would be approximately 10 feet by 10 feet.
- Install temporary wood poles (45 to 65 feet tall) with guywires or anchors, as needed. The poles would be removed after distribution underbuild is completed on power line TSPs (approximately December 2015).
- Transfer approximately 6 overhead and underground service connections. Underground service connections would involve trenching within and adjacent to pole work areas.
- Transfer distribution conductor between the existing distribution line to the shoo-fly poles and extend it to Behymer Avenue.
- Remove the temporary poles and conductor after the distribution underbuild on the power line TSPs is in service.

Permanent Wood Poles. The proposed TSP relocation and shoo-fly installation would require the installation of one new permanent interset pole east of TSP 315, and the relocation of two existing wood poles, one of which was previously planned for removal. The removal and disposal would be in accordance with the specifications in the IS/MND. The relocated poles would be replaced with new wood poles. The pole locations would be accessed from existing unpaved roads and private fields.

Distribution Connections. In addition to the service connection activities associated with the shoo-fly, an underground distribution connection near TSP 308 (see map in Appendix B) would be installed. The connection would be installed in an approximately 100-foot-long and 4-foot-deep trench. The trench would be excavated using mechanical trenching equipment and hand tools. Excavated soil would be stockpiled at the site and used to backfill the trench. Excess soil would be removed from the site. Topsoil would be salvaged, as needed.

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

TSP Relocation. PG&E proposes to realign the power line east of the prior alignment to avoid the need for a Temporary Construction Easement with the FMFCD. The eastward adjustment would relocate TSPs to PG&E's existing franchise position where an existing distribution line is currently located.

Temporary Shoo-fly. TSP relocation to the existing distribution line alignment would require PG&E to take the distribution line out of service during construction of the power line for worker and public safety. A temporary shoo-fly is necessary during construction of the new power line to maintain power service to six properties connected to the distribution line.

SHEPHERD SUBSTATION PROJECT
Minor Project Change Review Form

Permanent Wood Poles. Two distribution poles will be relocated and one new pole will be installed for the power line realignment and temporarily shoo-fly connection requirements, and to address landowner requests.

Distribution Connections. Additional temporary distribution connections would be necessary between served properties and the shoo-fly.

Part B: Existing Conditions					
Current and Adjacent Land Use(s):					
<p>The power line would be located within PG&E's existing franchise. The proposed shoo-fly corridor is located on a mix of land designated as low-density residential housing, agricultural lands, and undeveloped land. The power line and shoo-fly would be constructed adjacent to property and existing fence lines between Perrin Road and Behymer Avenue.</p> <p>Seven of the temporary shoo-fly poles are located within PG&E's existing franchise and three are located on private land east of the franchise. The three proposed permanent poles are located on private land.</p>					
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	Multiple	To be determined	Documentation required
<p>PG&E will secure landowner approvals prior to use of the additional work locations. Discussions with landowners are currently ongoing. PG&E has notified residences within 300 feet of the power line and shoo-fly that may be impacted by construction activities on January 10, 2014 and July 9, 2014, in accordance with Mitigation Measure (MM) Land Use-1 and Applicant Proposed Measure (APM) Noise-7.</p>					

Surveys <i>(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)</i>		
<p>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></p>	<input type="checkbox"/> Previously Surveyed <input checked="" type="checkbox"/> Survey Attached <input type="checkbox"/> N/A	<input type="checkbox"/> Positive <input checked="" type="checkbox"/> Negative
<p>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?</p>	<input type="checkbox"/> Previously Surveyed <input checked="" type="checkbox"/> Survey Attached <input type="checkbox"/> N/A	<input type="checkbox"/> Positive <input checked="" type="checkbox"/> Negative
<p>Hydrology. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?</p>	<input checked="" type="checkbox"/> Previously Surveyed <input type="checkbox"/> Survey Attached <input type="checkbox"/> N/A	<input type="checkbox"/> Positive <input checked="" type="checkbox"/> Negative

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

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	

Fresno County Encroachment Permit. PG&E would apply for an encroachment permit from the County for the TSP realignment and shoo-fly in the franchise area. PG&E estimates that an encroachment permit could be secured in one business day.

Part D: Attached Materials: <i>(e.g., surveys, maps, photos, memos, agency authorizations, etc.)</i>
<ul style="list-style-type: none"> A. PG&E MPM #2 Request Form B. TSP Realignment and Shoo-fly Location Map C. Special-status Plant Populations Map D. Cultural Resources Constraints Report (May 23, 2014) E. Summary of Pre-activity Botanical Surveys (June 26, 2014) F. Applied Earthworks Cultural Survey (July 1, 2014) G. TSP Location Number Key

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				
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The proposed actions and structures would be similar to the actions and structures addressed in the IS/MND and would not change visual impacts analyzed for the project. The TSP relocation distance would be minor (up to 19 feet east) and would not change the size or materials of the TSP or significantly increase the visibility of the TSPs from the previous proposal. The aesthetic impact of the relocated TSPs				

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	<i>De Minimis</i> Change	Potentially Significant Change	N/A
<p>would be consistent with the analysis presented in the IS/MND. Visual impacts from the shoo-fly would be temporary and consistent (i.e., same height and materials) with the existing distribution line that will be removed. The three permanent wood poles would either be replacing or located adjacent to existing wood poles, and therefore the aesthetic change would be minimal and insignificant.</p>				
<p>Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)?</p> <p><i>Previous IS/MND evaluation: Less than Significant with Mitigation</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The four TSP locations would be moved from land designated as Farmland of Local Importance and zoned for agricultural use to land designated as Urban or Built Up located in PG&E's franchise area. A portion of the shoo-fly would be located on residential properties zoned for agricultural use. The shoo-fly would be temporary and would not permanently convert agricultural land to non-agricultural uses. The modification would have no additional impacts to agriculture and forestry resources.</p>				
<p>Air Quality and Greenhouse Gases (e.g. produce additional emissions, or expose sensitive receptors to additional pollutants)?</p> <p><i>Previous IS/MND evaluation: Less than Significant with Mitigation</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The proposed actions would include the additional use of vehicles and equipment, and include additional ground disturbance from overland travel and installation of wood poles. The use of these types of equipment and activities were previously analyzed in the IS/MND, and impacts to air quality were determined to be less than significant with mitigation. The increase in air emissions and dust from the proposed activities would be minor and would not change the findings presented in the IS/MND. PG&E is required to implement applicable air quality APMs and MMs during construction. In addition, PG&E is in the process of obtaining approval from the Fresno County Air Pollution Control District for a Dust Control Plan that would be implemented. With implementation of mitigation addressed in the IS/MND, air quality impacts would remain less than significant.</p>				
<p>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)?</p> <p><i>Previous IS/MND evaluation: Less than Significant with Mitigation</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The project corridor was surveyed for special-status plants and animals in preparation of the IS/MND and none were identified. Additional focused surveys were conducted at the substation site and within 200 feet of naturalized areas along the power line corridor as required by MM Biology-1.</p>				

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	<i>De Minimis</i> Change	Potentially Significant Change	N/A
<p>Special-Status Wildlife. The area of the shoo-fly and relocated TSPs includes developed and disturbed agricultural areas. No special-status wildlife were identified within the area of TSP relocation or the proposed shoo-fly. PG&E will conduct preconstruction surveys and clearances for wildlife as required by applicable mitigation. Should any special-status 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 Operations & Maintenance Habitat Conservation Plan.</p> <p>Special-Status Plants. Focused preconstruction botanical surveys were conducted on May 1, 5, 21, and 22, and June 25, 2014 for the power line corridor and additional MPM #2 work areas. No special-status plant species were observed in the work areas for the proposed shoo-fly or TSP relocation. One special-status plant species was identified along the power line corridor near where trenching is proposed for the distribution connection near TSP 308. Spiny-sepaled button-celery (<i>Eryngium spinosepalum</i>) was discovered in abundance in the vicinity of TSP locations 305 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. No occurrences were observed south of TSP 310. Impacts to this species were addressed in the IS/MND and determined to be less than significant with implementation of MM Biology-1. MM Biology-1 states, "if sensitive plant species are present, [Avoidance and Minimization Measure] 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"/>
The project area was surveyed for cultural resources in preparation of the IS/MND and for work areas addressed in MPM #1 (Attachment D PG&E Cultural Resources Constraints Report dated May 23, 2014). In addition, PG&E submitted a survey memorandum (Attachment F Applied Earthworks Cultural Survey dated July 1, 2014) for proposed work areas addressed in MPM #2. No cultural resources have been identified at or adjacent to the proposed work areas. PG&E would implement applicable mitigation in the event that any previously unidentified resources or human remains are encountered.				
Paleontological Resources (e.g., cause adverse change to a paleontological resource)? <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 majority of the project area is located in a geologic formation that has been classified as a sensitive paleontological resource area, as described in the IS/MND. Impacts to potential paleontological resources during excavation, including TSP installation, were addressed in the IS/MND and determined to be less				

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	<i>De Minimis</i> Change	Potentially Significant Change	N/A
<p>than significant with mitigation, which included the preparation and implementation of a Paleontological Resources Management Plan (PRMP). The proposed actions would include additional excavation in a sensitive paleontological resource area during the installation of 10 temporary wood poles and three permanent wood poles. Approximately 10-foot-deep holes would be augured using the same techniques to set wood poles as described in the IS/MND. The additional excavation would be a minor increase in excavation compared to TSP foundation construction evaluated in the IS/MND and would not change the impact evaluation presented in the IS/MND. With implementation of the PRMP and other applicable mitigation, impacts to paleontological resources would remain less than significant.</p>				
<p>Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)?</p> <p><i>Previous IS/MND evaluation: Less than Significant</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Additional excavation and earth disturbance included with the proposed actions would be minor and would not change the findings of the IS/MND for geology and soil impacts. Erosion and sediment controls would be installed, as required by APM Geo-1/WQ-1.</p>				
<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 adopted emergency plan)?</p> <p><i>Previous IS/MND evaluation: Less than Significant with Mitigation</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The proposed activities would include the same risk of hazards as other activities addressed in the IS/MND. Temporary installation of the shoo-fly would have the same risk of causing a wildfire as distribution and power line construction activities included in the IS/MND. PG&E would install the shoo-fly using standard safe operating procedures and position the shoo-fly in a manner that would limit the chance of fires. PG&E would implement applicable APMs and MMs to reduce the risk of hazards, including implementation of the Site Safety Plan for the project. No hazardous materials would be stored at the proposed work areas.</p>				
<p>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)?</p> <p><i>Previous IS/MND evaluation: Less than Significant with Mitigation</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The proposed actions would not change hydrology impacts evaluated in the IS/MND. Seasonal wetland</p>				

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	<i>De Minimis</i> Change	Potentially Significant Change	N/A
boundaries near the distribution connection at TSP 308 will be flagged and fenced off for avoidance prior to construction. There are no hydrologic resources in or near the TSP relocation area or temporary shoo-fly. PG&E will follow all applicable avoidance and minimization measures for hydrologic features 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 impact land use and planning.				
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 impact mineral resources. There are no known mineral resources in the vicinity of the proposed shoo-fly or TSP relocation.				
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 actions would relocate four TSPs approximately 19 feet closer to residences east of the project corridor between Perrin Avenue and Behymer Avenue. The shoo-fly would involve construction activities approximately 50 feet east of the power line and within approximately 50 feet of the nearest residence. TSP installation activities would be the same as described in the IS/MND, and shoo-fly activities would produce approximately the same level of noise as overhead distribution construction, which was analyzed for in the IS/MND along Sunnyside Avenue south of Shepherd Avenue. Temporary construction noise impacts would remain less than significant with implementation of APMs Noise-1 through Noise-7. PG&E notified residences along the power line and shoo-fly corridors of project construction activities on January 10 and July 9, 2014, as required by MM Land Use-1 and 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 impact population and housing.				
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"/>

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	<i>De Minimis</i> Change	Potentially Significant Change	N/A
The proposed actions would not impact public services.				
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 impact recreational resources.				
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Construction traffic associated with the proposed actions would access work areas via the roadways analyzed in the IS/MND. The TSP relocation would not increase construction vehicle trips. Construction of the shoo-fly would include a minor amount of additional construction vehicle trips during installation and removal of the shoo-fly. The number of additional vehicle trips would be low and the proposed actions would not degrade the performance of the circulation system. Therefore, the proposed action 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. The shoo-fly is proposed to maintain electrical service to residents located between Perrin Avenue and Behymer Avenue.				

Attachment A



SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form

Proposed Minor Project Change Type:	Request #:
Minor Project Modification (MPM)	2

Part A: Proposed Minor Project Change Summary			
Date Submitted:	Requested Approval Date:	Start Date:	Expected End Date:
7/1/2014	8/1/2014	8/1/2014	12/31/2015
Submitted by:	Organization and Title:	Duration and Work Hours:	
Brooke Langle	Terra Verde - Environmental Compliance Supervisor	Use 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>			
<p>1) Shift four tubular steel pole (TSP) locations east between Shepherd Substation and Behymer Avenue; south end of transmission line component. Install up to 7 isolation/non-conductive fence panels along existing fence line.</p> <p>2) Approximately 0.5 miles of temporary shoo-fly along North Sunnyside Avenue and east of transmission line.</p> <p>3) Relocation of three distribution poles, one of which will be considered a permanent interset pole, in the vicinity of TSP 0/14 (one of these poles was originally slated for removal).</p> <p>4) Distribution line trenching adjacent to TSP 0/7.</p> <p>5) Trimming or clearing of vegetation for the shoo-fly work.</p>			
Proposed Action(s): <i>(List and describe each proposed action)</i>			
<p>1) Adjust the proposed footing and overhead locations of four TSPs (Poles 1/14 – 1/17) up to 19 feet eastward. No changes to the proposed aesthetic design, construction methods, or time necessity will occur as a result of this modification. Isolation/non-conductive fencing panels/gates will need to be installed at approximately 7 locations along this portion of the project due to the proximity of the TSPs to the existing fence line. These panels would replace existing fencing at the needed locations and tie back to the existing fence line.</p> <p>2) A temporary shoo-fly alignment, comprised of up to 10 wood poles, would be installed approximately 50 feet east of the existing distribution wood pole alignment. Of these temporary poles, 7 are located within PG&E's existing franchise and 3 are located east of the existing franchise. The shoo-fly is planned to be constructed between Shepherd Substation and Behymer Avenue prior to initiating work on the transmission line segment. A distribution pole at the northeast edge of the Shepherd Substation Property</p>			



SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form

will be added and may remain permanently. Removal of the existing distribution poles would occur as previously planned. The additional shoo-fly activities will include:

- Auger temporary wood pole holes approximately 10 feet deep.
- Install temporary wood poles (45'-65' tall), potential guys/anchors, and backfilling with soil and/or imported clean material; topsoil will be salvaged as needed.
- Transfer overhead and underground service connections (trenching is expected to remain within the expected ground disturbance area of 100 square feet).
- Relocate existing conductor from removed poles (removing existing wood poles was previously permitted and described in the Project Description).
- Remove temporary poles after distribution is moved to the TSPs.

No additional equipment storage and/or staging areas are requested to accomplish the shoo-fly work; however, ground-disturbing actions are anticipated within an approximate workspace of 10 feet by 10 feet at each pole. Access to shoo-fly pole installations will occur via existing paved and unpaved roads when possible. When necessary, overland travel to work locations would occur. Overland travel is only anticipated for three poles.

3) Distribution line work is planned to include a permanent interset pole installation near TSP 1/14 and two additional wood poles along an existing dirt road east of the interset pole. The new wood poles would replace two existing wood poles located within a private field; these two existing poles will be removed. Access to the new pole locations will occur via existing unpaved roads; access to pole removal locations will occur via overland travel through the field.

4) PG&E will intercept an existing underground power line by open trenching near TSP 0/7, north of the ditch and eucalyptus stand. The trench length is expected to be no more than 100 feet at up to 4 feet deep and 2 feet wide; however, the exact location of the existing line is unknown and trench may extend further as needed. It is expected that all work will occur within the approved workspace per the Mitigated Negative Declaration. Spoils will be locally stockpiled, segregating topsoil as needed, and backfilled with native soil once work is complete. Trenching is planned to occur with a mechanical trencher supplemented by hand digging.

5) Vegetation work will include side trimming/lowering of tree growth at locations along the shoo-fly alignment. Some of these locations were addressed in Notice to Proceed #2; however, the extent of tree work will depend on shoo-fly pole clearance needs and scope beyond the previous allowances. Areas that may be trimmed include:

- Cottonwoods and eucalyptus north and south of TSP 1/16.
- Cottonwoods north of TSP 1/14.
- Pine tree east of TSP 1/13.
- Eucalyptus trees just south of Behymer Avenue.

All work under MPM #2 will comply with existing project requirements and work hours, including the Shepherd Substation SWPPP requirements.

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

1) The purpose of the alignment shift to the east is to accommodate Temporary Construction Easement



SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form

negotiations with the adjacent landowner, Fresno Metropolitan Flood Control District (FMFCD). The eastward adjustment would locate problematic TSPs within the land rights of existing PG&E Franchise Agreements with local agencies.

2) Construction, even marginally further east than previously proposed, would encroach too closely to existing PG&E overhead distribution facilities for large equipment to safely operate; a shoo-fly installation to the east is necessary to allow sufficient overhead safety clearance during construction and in order to keep six local residents in service.

3) Existing distribution lines located west of TSP 1/14 require the installation of an interset pole adjacent to the TSP. Per specific landowner request, the additional wood poles will be relocated along the existing dirt road in order to remove the pole from his field.

4) The existing underground facilities supply power to a PG&E customer in the project vicinity. Relocating the existing distribution lines requires a new power supply to the underground line.

5) Vegetation work is required to accommodate 15-foot safety clearance needs for electric power lines.

Part B: Existing Conditions

Current and Adjacent Land Use(s):

As described in the Mitigated Negative Declaration (MND) Project Description, land uses along the proposed power line alignment include a mix of low-density residential housing, agricultural lands, and undeveloped land. The 115-kV power line and shoo-fly alignment would be built along property lines and along existing fence lines between Perrin Road and Behymer Avenue.

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	Multiple		

PG&E will secure landowner approvals prior to use of the additional work locations. Discussions with landowners are currently ongoing. Per Land Use and Planning, and Noise Mitigation Measures, if any new landowners will be affected by the planned construction, they will be appropriately notified no less than 30 days prior to the start of activity. No new landowners have been identified at this time.

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*

<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	



SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form

<i>applicable resource category in Part E)</i>		
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

PG&E anticipates applying for an encroachment permit from the County of Fresno for the TSP realignment and shoo-fly in the franchise area. Estimated time to receive this type of permit is one business day.

Part D: Attached Materials: <i>(e.g., surveys, maps, photos, memos, agency authorizations, etc.)</i>
TSP Realignment and Shoo-fly Location
Special-status Plant Populations Map
Cultural Resources Constraints Report (May 23, 2014)
Summary of Pre-activity Botanical Surveys (June 25, 2014)
Applied Earthworks Cultural Survey (July 1, 2014)

Part E: IS/MND Consistency

SHEPHERD SUBSTATION PROJECT

Minor Project Change Request Form



Impact Question	No Change	De Minimis Change	Potentially Significant Change	N/A
<p>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.)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>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.</p> <p>Biological Resources: The locations of the TSP relocation areas were surveyed as part of the MND analysis, Figure 3.5-1, and will be included in preconstruction biological surveys. Additionally, focused botanical surveys in accordance with Mitigation Measure (MM) Biology-1 were conducted on May 01, 05, 21, 22, and June 25, 2014. The field survey on June 25 included the additional work areas described within this MPM request. Protection measures for sensitive plant species will be followed for any locations supporting spiny-sealed button-celery (<i>Eryngium spinosepalum</i>). No occurrences were observed south of TSP 0/9. A wetland exists nearby but will be avoided in accordance with project requirements and MPM #1.</p> <p>Cultural Resources: On May 23, 2014 PG&E Cultural Resources Specialist Wendy Nettles supplied a Cultural Resources Constraints Report of the additional workspaces included in MPM #1, including the distribution trenching area. On June 25, Applied Earthworks (AE) Staff Archaeologist, Chuck Pansarosa, conducted a field survey of the area proposed for construction in MPM #2. No additional resources were observed; the respective memos are included.</p> <p>Hydrology: The additional work locations in this MPM were surveyed as part of the MND analysis, Figure 3.5-2; seasonal wetlands would be avoided per project Mitigation Measures and MPM #1.</p>				

Attachment B

Shepherd Substation Project TSP Relocation Map

- Shoo-fly Line
- Existing Overhead Distribution Line
- Existing Wood Pole
- New Wood Pole (Permanent)
- Shoo-fly Pole (Temporary)
- New TSP Location
- Old TSP Location
- Substation
- Parcel Boundaries
- Distribution Trench

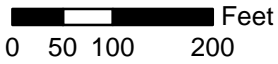


0 50 100 200 Feet




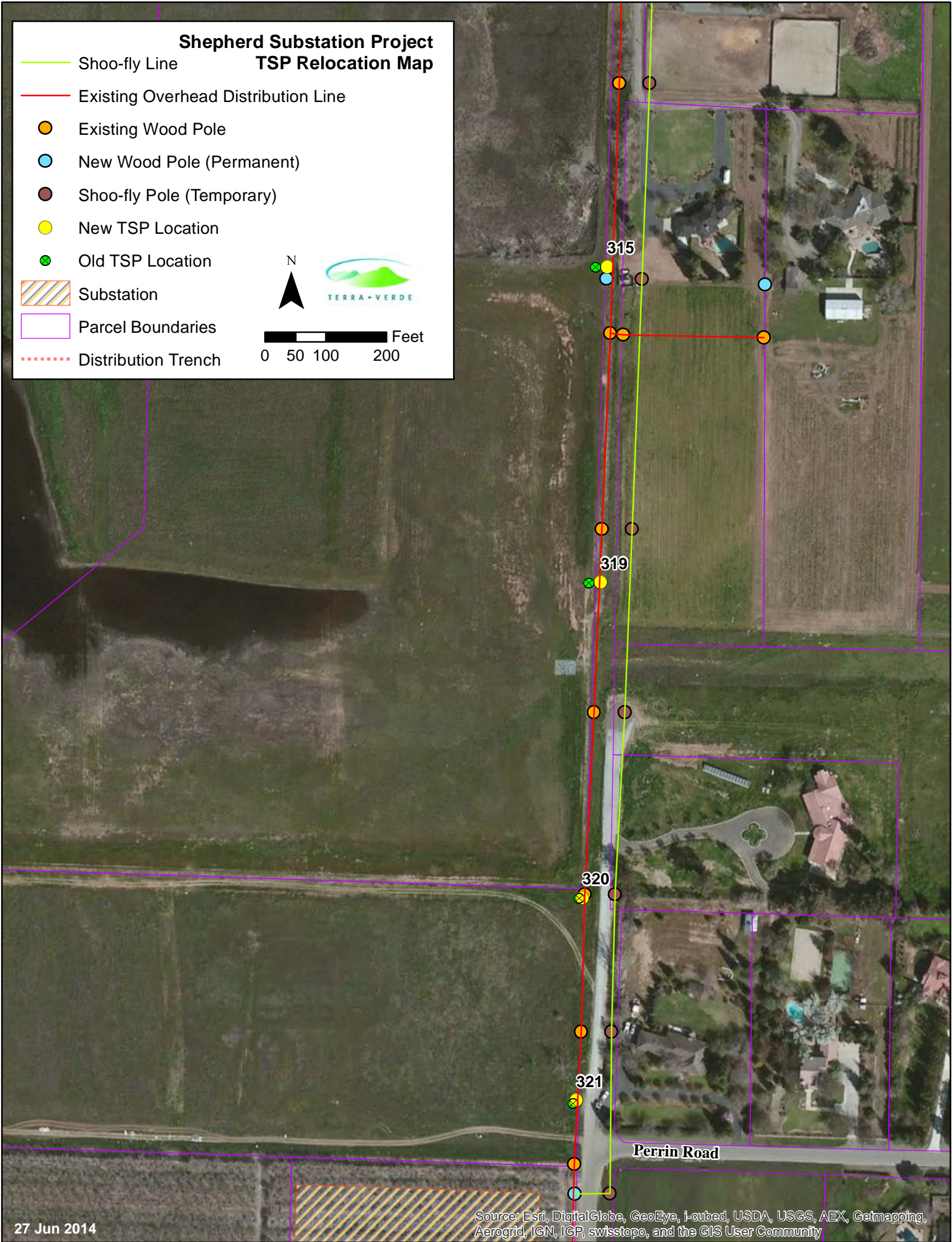
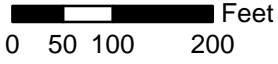
Shepherd Substation Project TSP Relocation Map

- Shoo-fly Line
- Existing Overhead Distribution Line
- Existing Wood Pole
- New Wood Pole (Permanent)
- Shoo-fly Pole (Temporary)
- New TSP Location
- Old TSP Location
- Substation
- Parcel Boundaries
- Distribution Trench



Shepherd Substation Project TSP Relocation Map

- Shoo-fly Line
- Existing Overhead Distribution Line
- Existing Wood Pole
- New Wood Pole (Permanent)
- Shoo-fly Pole (Temporary)
- New TSP Location
- Old TSP Location
-  Substation
- Parcel Boundaries
- - - - Distribution Trench



Attachment C

**Shepherd Substation Project
Special-status Plant Populations**



Workspaces/Structures

- TSP
- TSP Workspace
- Temporary Turn-around

Workspace Buffers

- 200-foot Buffer
- 250-foot Buffer
- 500-foot Buffer

Resources

- SSBC Occurrence
- SSBC Population
- SSBC Population (no access)
- Drainage
- Seasonal Wetland



20 Jun 2014

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

Attachment D



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
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	

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.

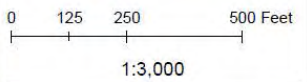
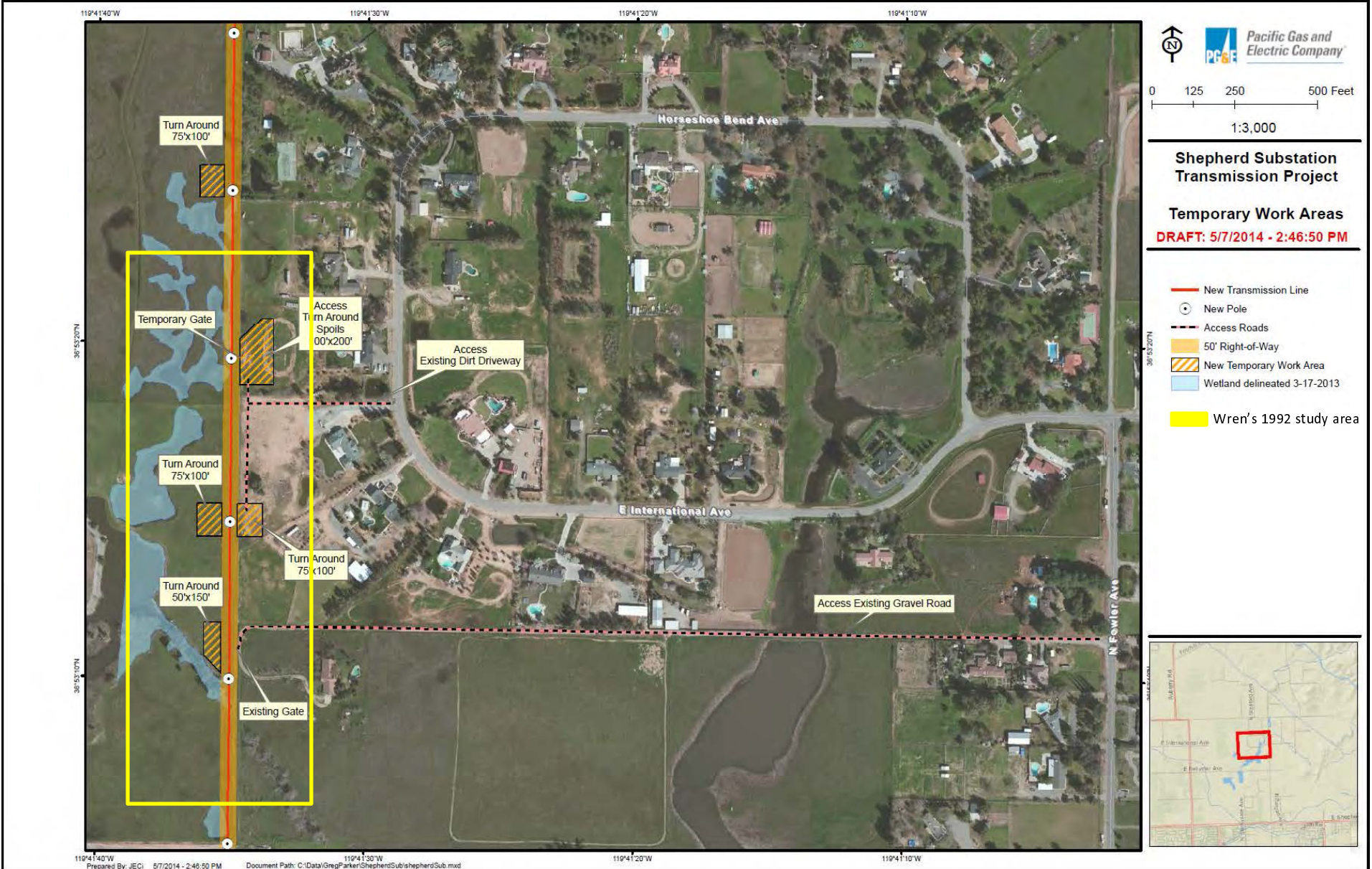
Inadvertent Discovery Contact

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)



**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



Attachment E



June 26, 2014

Greg Parker, Principal Land Planner
Pacific Gas and Electric Company
1455 East Shaw Avenue, Bag 23
Fresno, California 93710

**RE: Summary of Pre-activity Botanical Surveys, PG&E Shepherd Substation Project
Clovis, California**

Dear Mr. Parker,

This memo is being provided to summarize the results of pre-activity botanical surveys conducted on May 01, 05, 21, and 22, and June 25, 2014 in support of Pacific Gas and Electric Company's (PG&E) Shepherd Substation Project (Project). Surveys were completed in accordance with Mitigation Measure (MM) Biology-1 in the Mitigated Negative Declaration (MND) prepared for the Project. Per the MND, there are four special-status plants with potential to occur in the Project survey area:

- San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*); California endangered, Federally threatened, and California Rare Plant Rank (CRPR) 1B.1
- Succulent owl's clover (*Castilleja campestris* subsp. *succulenta*); California endangered, Federally threatened, and CRPR 1B.2
- Spiny-sepaled button-celery (*Eryngium spinosepalum*); CRPR 1B.2
- Dwarf downingia (*Downingia pusilla*); CRPR 2.2

Terra Verde botanists Kristen Nelson and Jessica Adinolfi conducted pre-activity surveys for botanical resources in all native and naturalized habitat areas within a 200-foot buffer of all Project components on May 01 and 05, 2014. The survey area included the following areas: (1) the transmission alignment (between Perrin Road and East Copper Avenue) as well as a 200-foot buffer to the west, and to the extent that access was feasible to the east of the transmission alignment; (2) the tension-pull site north of Tubular Steel Pole (TSP) 0/1 (north of Copper Avenue) and a 200-foot buffer to the north and west of the tension-pull site; (3) a 200-foot buffer to the north and east of the substation site; (4) the open, naturalized area parallel to



Shepherd Avenue, just west of North Fowler Avenue; and (5) the open, naturalized areas at the northeast and southeast corners of the intersection of Nees Avenue and North Sunnyside Avenue. All other areas within 200 feet of Project workspaces were not considered to be native or naturalized (e.g., developed, ruderal, or active agriculture/orchards) and were not surveyed.

On May 01, prior to initiating surveys within the Project area, Ms. Nelson and Ms. Adinolfi met PG&E Biologist Zach Parker at a nearby Cal Trans mitigation property along Highway 41. The mitigation property is located approximately 6.5 miles northwest of the Project and supports documented/known populations of three of the four potentially occurring special-status plants, including: San Joaquin Valley Orcutt grass, succulent owl's clover, and spiny-sealed button-celery (SSBC). Additionally, due to the wide blooming window for San Joaquin Valley Orcutt grass (April to September), a second survey for this species was completed at the reference site on June 25, 2014 to account for seasonal fluctuations in bloom time. SSBC was readily identifiable and abundant at the mitigation property (i.e., reference site) during both surveys. However, the San Joaquin Valley Orcutt grass and the succulent owl's clover were not detected at the reference site during a comprehensive survey throughout known occupied habitat. As such, it was determined that the timing of surveys were suitable for the detection of spiny-sealed button-celery, if present within the Project survey area. Annual population fluctuations, and below average rainfall during the winters of 2012 to 2013 and 2013 to 2014 may have contributed to the lack of detection of the San Joaquin Valley Orcutt grass and succulent owl's clover.

A publicly accessible reference site for dwarf downingia was not identified. The rare plant chair of the Fresno chapter of the California Native Plant Society, John Stebbins, was consulted regarding the identification and detection of dwarf downingia as well as common downingia species this year. Mr. Stebbins noted that it is a poor blooming year for even the more common species of downingia.

A species inventory was completed for all surveyed areas within a 200-foot buffer of Project workspaces, as described above. Plant species identification, nomenclature, and taxonomy followed *The Jepson Manual: Vascular Plants of California* (Baldwin et al 2012). SSBC was identified throughout most of the 200-foot survey buffer to the west of the transmission line between TSP 0/4 and TSP 0/9.

On May 21 and 22, subsequent surveys of the transmission line section of the Project were conducted in order to enumerate and map individuals of SSBC within the 200-foot survey buffer. Mapping was completed using a Trimble Global Positioning System (GPS) unit (accuracy



< 1m) between TSP 0/4 and 0/9, where suitable, occupied habitat was identified. During the mapping effort, it was noted that the population of SSBC also extends to the east of PG&E's right-of way in one area (bounded property lines) between TSP 0/5 and 0/6. However, access constraints for the properties east of the transmission line limited the survey effort to the extent that plants could be identified and counted from a visual scan over the fence line in this section. Special-status plant populations documented within the Project survey area were mapped using Geographic Information System (GIS) software (see attachment). No other special-status species were identified during any of the survey efforts. Additionally, in accordance with MM Biology-2 in the MND, a search for Molestan blister beetle was conducted in conjunction with botanical surveys; none were observed.

If you should have any questions or require further information, please contact me at knelson@terraverdeweb.com or at (702) 596-5038.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Nelson", is written over a light gray circular watermark.

Kristen Nelson, Botanist
Terra Verde Environmental Consulting

Attachments:

Shepherd Substation Project – Special-status Plant Populations Map

Cc: Zachary Parker, PG&E Senior Biologist
Brooke Langle, Environmental Compliance Supervisor

Attachment F

July 1, 2014

Terra Verde Environmental Consulting
ATTN: Ms. Brooke Langle
3765 South Higuera Street, Suite 102
San Luis Obispo, CA 93401

RE: Additional Cultural Resources Services for the Shepherd Substation Project near the Cities of Fresno and Clovis, Fresno County, California.

Dear Ms. Langle:

In order to meet the long-term capacity needs and increase the reliability and flexibility of the Woodward Distribution Planning Area, which serves portions of the cities of Fresno and Clovis, Pacific Gas and Electric Company (PG&E) proposes to construct and operate the Shepherd Substation in Fresno County, California (Project). A project modification request is being prepared to install a temporary shoo-fly along Sunnyside Avenue between Perrin and Behymer Avenues (Figure 1) in northeast Fresno, which includes the installation of several temporary wood poles and two permanent wood poles. Other project modifications include trenching for connection of an underground distribution line adjacent to tubular steel pole (TSP) 308 and relocation of four TSPs, also between Perrin and Behymer.

On June 25, 2014, Æ Staff Archaeologist Chuck Pansarosa examined the shoo-fly alignment and new pole locations for any surface evidence of cultural resources. Two additional surveys conducted near TSPs 308 and 309 will support project activities which will be addressed in a future modification request. Methods generally consisted of parallel and meandering transects spaced no more than 10 meters apart where access was available. Visible earth, rodent burrow backdirt, and exposed bedrock were all examined closely for evidence of cultural resources. Surface visibility ranged from poor to very good. The general vicinity of the current investigation is comprised of rolling pasture land interspersed with small residential parcels and orchards. Seasonal grasses cover the open pastures and few native (oak and cottonwood) and non-native (eucalyptus) trees are present along the drainages. Within the survey corridor, the terrain consists of landscaped yards, an almond orchard, dry pasture, seasonal drainages, and ponding basins operated by the Fresno Metropolitan Flood Control District. In addition to the grading associated with the residences, substantial earth-moving activity has occurred within and adjacent to the project area. The almond orchard at the northwest corner of Sunnyside and Behymer has been levelled with at least four feet of material removed from the northeast corner of the orchard (as evidenced in the adjacent road cut which, presumably, exhibits the native contour) and the ponding basins at the southwest corner of Sunnyside and Behymer have been excavated to depths of at least 25 feet.

As a result of the survey, no surficial evidence of cultural resources (prehistoric, historical, or built environment) was observed within the project area. In the event that previously undetected cultural materials are discovered during construction, work in the immediate vicinity should cease temporarily and be redirected to another area until a qualified archaeologist inspects and evaluates the find.



Finally, if human remains are uncovered, or in any other case where human remains are discovered, the Fresno County Coroner is to be notified to arrange their proper treatment and disposition. If the remains are identified—on the basis of archaeological context, age, cultural associations, or biological traits—as those of a Native American, California Health and Safety Code 7050.5 and Public Resource Code 5097.98 require that the coroner notify the NAHC within 24 hours of discovery. The NAHC will then identify the Most Likely Descendant who will determine the manner in which the remains are treated.

Sincerely,

//signed//

Jay B. Lloyd, M.A., R.P.A.
Senior Archaeologist

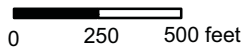


Figure 1 Shepherd Substation Project TSP relocation map.

Attachment G

SHEPHERD SUBSTATION PROJECT
Tubular Steel Pole (TSP) Numbering

New/Current TSP Location Number	Old/Other TSP Location Number(s)
5/6	100, 300, 0/0, 0/1
0/1	302, 0/2
0/2	303, 0/3
0/3	304, 0/4
0/4	305, 0/5
0/5	306, 0/6
0/6	307, 0/7
0/7	308, 0/8
0/8	309, 0/9
0/9	310, 0/10
0/10	311, 0/11
1/11	312, 1/12
1/12	313, 1/13
1/13	314, 1/14
1/14	315, 1/15
1/15	316, 319, 1/16
1/16	317, 320, 1/17, 1/20
1/17	318, 321, 1/18, 1/21
1/18	319, 18-2, 1/19