

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 23, 2014

Robert Donovan
Senior Land Planner
Pacific Gas & Electric
Environmental Management - Transmission
245 Market Street, N10A
San Francisco, CA 94105

RE: Embarcadero-Potrero 230 kV Transmission Project (E-P): Minor Project Change #1

Dear Mr. Donovan,

On July 16, 2014, Pacific Gas and Electric Company (PG&E) submitted a request to the California Public Utilities Commission (CPUC) for a Minor Project Change for use of an existing staging and laydown yard adjacent to Alternate Staging Area #3 on Amador Street identified in the Project Initial Study/Mitigated Negative Declaration (IS/MND), in the City of San Francisco, San Francisco County, California. Additional information was submitted on July 21, 2014.

The CPUC voted on January 16, 2014 to approve the PG&E Embarcadero – Potrero 230 kV Transmission Project (Decision D.14-01-007) and a Notice of Determination was submitted to the State Clearinghouse (SCH#2013082047).

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Embarcadero – Potrero 230 kV Transmission Project during implementation. The MMCRP also acknowledges that temporary changes to the project, such as the need for additional workspace, are anticipated and common practice for construction efforts of this scale and that a Minor Project Change request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this Minor Project Change, and that no new impacts or increase in impact severity would result from the requested Minor Project Change activities.

Minor Project Changes are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. Minor Project Changes do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

Minor Project Change #1 to allow use of an existing staging and laydown yard adjacent to Alternate Staging Area #3 on Amador Street is granted by CPUC based on the factors described below.

PG&E Minor Project Change Request. Excerpts from the PG&E Minor Project Change request, received July 16, 2014, as well as a clarification email received July 21, 2014 are presented below (indented):

PG&E requests a Minor Project Change for the use of an existing staging and laydown yard adjacent to Alternate Staging Area #3 on Amador Street identified in the Initial Study/Mitigated Negative Declaration (IS/MND), in the City of San Francisco, San Francisco County, California. PG&E's contractor planned to utilize Alternate Staging Area #3 specifically identified in the IS/MND; however, this staging area is currently leased out by the Port for the duration of the project to multiple other firms, and PG&E has been informed that it will not be available. The Port recommended using the adjacent property to the north, a 3-acre parcel and the subject of this minor project change. The proposed staging area is a commercially available staging area that is immediately adjacent and to the north of the Alternate Staging Area #3 from the MND, is owned by the same property owner (the Port of San Francisco), fronts on the same road, and is similarly already disturbed and paved.

Although this staging and laydown area was not specifically mapped in the final IS/MND that was prepared by the CPUC, the IS/MND noted that additional off-site existing yard space may be used for the project and this space falls under that category. The MND states "Existing commercially available office and yard space may be used by contractors or agencies" (p. 4-47, Aspen 2013); and "Commercially available off-site office and yard space may also be used" (p. 4-11, Aspen 2013).

The yard will be used as a typical construction laydown area for storage of equipment and materials (equipment such as excavators, backhoes, support equipment, pickup trucks, traffic control devices, etc.). Laydown will be needed as equipment and materials will not be able to be left within public right-of-way at end of work shift. Materials will include PVC pipe, HDPE pipe, shoring materials, etc. It should be noted for HDD work, some materials and equipment must be left in place.

Mounds of soil that exist are placed so no access is allowed into the site. These mounds of soil will need to be moved so ingress and egress to the site is possible. Soil will need to be moved securing an area where fencing and ground has such an elevational change; a person could crawl under the fence to gain access. The area is known for vandalism and theft.

Hours of work could be outside of the CCSF permitted daytime work hours being 7:00 a.m. to 8:00 p.m. due to possible three factors. (1) Night time noise permits are known to be required at the Fremont and Folsom intersection at time of duct bank and vault installation based upon Fremont Street being a Caltrans off ramp. Caltrans will be requiring night time work. Caltrans hours are expected to be 9:00 p.m. to 5:00 a.m. (2) For HDD work, night time noise permits will be requested in case issues arise during pullback of HDD pipe on the north landing and pullback started during the day cannot be finished until after the 8:00 p.m. approval. This is not expected to be used, but should be considered when pullback cannot be stopped at any time once started. (3) Finally, with the two high rise buildings that are under construction on Folsom Street, city and possible SFMTA could mandate night time work based upon consistent concrete pours ongoing through 2015, undetermined at this time and would only affect duct bank installation.

Mobile light plants will be used at the yard with suppression whisper quiet exhaust and associated engines.

The area is zoned "industrial" as it serves as the city's largest concrete batch plant with material yards surrounding the laydown yard area. Noise suppression will be implemented with whisper quiet generator powering the site as no power or telephone exist.

The new staging and laydown area will increase the acreage of the project, and will be addressed in the SWPPP or SWPPP amendment.

CPUC Evaluation of Minor Project Change Request

In accordance with the MMCRP, the subject Minor Project Change request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested Minor Project Change activities. This review also included a visit of the subject site on May 21, 2014 by the CPUC Environmental Monitor (EM). The following discussion summarizes this analysis for biological, cultural, paleontological, and

hydrological resources, and sensitive land uses/noise. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions and/or are proposed conditions by PG&E.

Biological Resources: PG&E submitted a biological report prepared by David Rasmussen dated June 26, 2014 with the request for Minor Project Change. The report documents the biological conditions for the proposed existing staging yard on Amador Street, San Francisco, California. A field visit and habitat assessment for the staging and laydown area were conducted on June 23, 2014 by CH2M Hill Biologist, David Rasmussen. The focus of these surveys was to identify potential biological resources such as special-status species, sensitive natural communities, and potential for nesting birds. During these surveys, a 100-foot buffer for passerine nests and a 300-foot radius for signs of nesting raptors were evaluated.

The proposed staging and laydown area is located in a large, disturbed, graveled lot located on the west side of Amador Street within Port of San Francisco property. This lot is surrounded on all sides by an elevated concrete berm and a chain link fence. The northeastern corner of the lot is a 25-foot wide by 75-foot long concrete detention basin that was filled with stagnant water. The southern portion of the lot has a building foundation that appears to have been abandoned, and several spoils piles that have predominantly ruderal non-native vegetation growing on them. The majority of the site is completely free of vegetation.

Dominant vegetation on the fringe of the staging and laydown area and on the spoils piles was ripgut brome (*Bromus diandrus*), telegraph weed (*Heterotheca grandiflora*), mustard (*Brassica rapa*), fennel (*Foeniculum vulgare*), dove weed (*Croton setigerus*), English plantain (*Plantago lanceolata*), and wild radish (*Raphanus raphanistrum*). Scattered native vegetation includes coyote brush (*Baccharis pilularis*), and California coffeeberry (*Rhamnus californica*). To the east of the staging and laydown area is disturbed coastal scrub that is dominated by annual grasses, coyote brush, acacia (*Acacia* sp.), and California coffeeberry.

This area is separated from the staging and laydown area by a concrete wall and chain link fence, and it will not be disturbed by work activities. The staging area is not suitable habitat for any special-status species, and no nesting passerines or raptors were observed during the surveys at the work location. No additional impacts to biological resources are anticipated with the implementation of the conditions noted below.

Cultural and Paleontological Resources: A cultural records search was performed for this Minor Project Change request. The site has been previously evaluated in the Archaeological Resources Investigations for the Waterfront Plan Environmental Impact Report (EIR), San Francisco (Hupman and Chavez, 1995; on file at NWIC, Sonoma State University), and no resources were found. The site is almost entirely paved with an area of spoils supporting non-native vegetation.

There are no paleontological concerns for the Amador Staging and Laydown Yard as there will be no ground disturbance.

No impacts to cultural or paleontological resources are anticipated with the implementation of the conditions noted below.

Hydrological Resources. The new staging and laydown area is bordered by the San Francisco Bay on the east side and will increase the acreage of the project. This site and acreage increase will be addressed in the SWPPP or SWPPP amendment. No impacts to hydrological resources are anticipated with the implementation of the conditions noted below.

Sensitive Land Uses/Noise. The new staging and laydown area is immediately adjacent to the proposed Alternate Staging Area #3 and is zoned “industrial”. The new yard would not impose any further impacts already addressed in the Mitigated Negative Declaration. With the implementation of the conditions noted below, no significant impacts to sensitive land uses are anticipated.

The conditions noted below shall be met by PG&E and its contractors:

- All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this Minor Project Change shall be available on site for the duration of construction activities.
- Conduct biological monitoring in compliance with APM BIO-1, and monitor for compliance with all APMs and MMs during active use of the subject yard.
- In accordance with Mitigation Measure B-4, between February 15 and August 31, “nesting survey sweeps” shall occur on a regular basis, as deemed appropriate by the level of nesting activity. If active nests are found, a Biological Monitor shall establish an appropriate buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The Biological Monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted with the approval of CDFW and USFWS, and with prior knowledge of the CPUC.
- All crew members shall be Worker Environmental Awareness Program (WEAP) trained prior to working on the project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the WEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
- Per APM WQ-1, where construction activities occur near a surface water body or drainage channel, the staging of construction materials and equipment and excavation spoil stockpiles will be placed at least 50 feet from the water body and properly contained, such as with berms and/or covers, to minimize risk of sediment transport to the drainage. Any surplus soil will be transported from the site and appropriately disposed of.
- The SWPPP or SWPPP amendment shall be submitted to the CPUC prior to occupation of the new staging and laydown yard.
- As proposed in APM LU-1, a public liaison representative shall provide the public with advance notification of construction activities, between two and four weeks prior to construction. PG&E shall also publish a notice of impending construction in local newspapers, stating when and where construction will occur. All construction activities shall be coordinated with the City and Port of San Francisco at least 30 days before construction begins in these areas.

- If any unanticipated lane restrictions or closures are found to be necessary, prior proof of coordination with emergency service providers and all necessary permits shall be submitted to the CPUC.
- All complaints received by PG&E in regard to the yard shall be logged and reported immediately to the CPUC. This includes complaints relevant to noise, dust, etc. Complaints shall also be forwarded to the City of San Francisco. If complaints cannot be resolved, activities at the site may need to be modified and/or sound attenuation devices may be to be installed, etc., depending on the nature of the complaint.

Sincerely,



Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen