

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 21, 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): Notice to Proceed #1

Dear Mr. Donovan,

On June 23, 2014, Pacific Gas and Electric Company (PG&E) submitted a Notice to Proceed request to the California Public Utilities Commission (CPUC) for site preparation and excavation of the proposed 230 kV Potrero Switchyard site, in the City of San Francisco, San Francisco County, California. Additional information was submitted on August 1 and August 20, 2014.

The PG&E Embarcadero – Potrero 230 kV Transmission Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures and applicant-proposed measures (APMs) described in the Final Mitigated Negative Declaration (MND) were adopted by the CPUC as conditions of project approvals. 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 CPUC voted on January 16, 2014 to approve the Final MND for 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 Embarcadero – Potrero Project will be constructed in 5 phases and NTPs will be issued for each phase. This is a typical process for transmission line projects. Given that the Embarcadero – Potrero Project has been approved by the CPUC, as described above, this phased construction review process allows PG&E to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

This letter documents the CPUC's thorough evaluation of all activities covered in this NTP, including the mitigation compliance table provided with the subject NTP. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision.

PG&E also proposes use of two existing access roads within the existing switchyard property that were not included in the project area or description in the MND. The MMCRP acknowledges that temporary changes to the project, such as the need for additional workspace or access, are anticipated and common practice for construction efforts of this scale and that a Minor Project Change request would be required for these activities and can be incorporated into an NTP. 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.

NTP #1 for the site preparation and excavation of the proposed 230 kV Potrero Switchyard site is granted by the CPUC based on the factors described below.

### **PG&E NTP Request**

The CPUC has carefully reviewed the NTP request (NTPR) submitted by PG&E, and verified that it incorporates compliance with all applicable mitigation measures and APMs. Excerpts from the PG&E NTPR dated June 20, 2014 are presented as follows (indented):

As previously discussed with CPUC, PG&E intends to construct the project in several phases to coincide with construction phasing, environmental restrictions, and implementation of the preconstruction mitigation measures. PG&E is proposing to begin construction on the Potrero Switchyard site in San Francisco (see MND Figure 4-4). The first Notice to Proceed (NTP #1) is being sought for site preparation and excavation for the Proposed 230 kV Potrero Switchyard site and Staging Area (see MND Figure 4-4), including work in the temporary work space identified as Staging Alternative 1 in the MND (Figure 4-5).

Work will include:

- Site preparation
- Fence installation
- Demolition of existing pavement and structures within the identified work areas
- Excavation
- Drilled displacement columns for ground improvement preparation prior to the actual building construction

Equipment planned to be used for work under NTP #1 include: backhoe (w/hoe-ram), skip loader, bobcat, excavator (various sizes, w/hoe-ram), large loader, dump truck, bulldozer, Sheep's foot roller, Vibraplate compactor, drill rig, concrete pump truck (boom), concrete pump truck (line hose), Gradeall (fork lift), crane (truck), flatbed delivery trucks, welding truck, JLG, welding generator, scissors lift, grout/concrete mixer, ditch witch, asphalt laying machine, drum roller, and fence installer. PG&E will also have dump trucks and utility pole trucks on site.

Drilled displacement columns for ground improvement, improves the density, strength and stiffness of weak and loose soil. The drilled displacement columns are drilled areas about 18 inches in diameter that are drilled into the soil, and then backfilled under pressure with controlled low strength material into the cavity left by the drill displacement tool. The drill could be up to 35 feet in depth. The drilled displacement columns will be installed in close proximity to each other, the object being to push (displace) the soil against the nearby columns causing compaction of the soil. The more columns, the more compaction inside the desired area.

GIS building construction will be covered under a separate NTP.

### **Minor Project Change**

PG&E submitted the following Minor Project Change information on August 20, 2014 to be included in NTP #1 along with figures and photographs:

In order to safely access the work area and future switchyard site, access is proposed from Illinois Street eastward along Humboldt Avenue to the work area, and along the internal access road on the west side of the work area/switchyard site to 23<sup>rd</sup> Street. The site access off/on Illinois Street to/from Humboldt Street is entirely contained within PG&E's Switchyard. The access continues to 23<sup>rd</sup> Street along the edge of the work area/proposed switchyard. These roads are gated at the street and are not publicly accessible. PG&E parking will also be allowed along the east side of the road in an area that is contiguous with the work site.

### **CPUC Evaluation of Preconstruction Mitigation Implementation**

All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. For biological resources, those additional conditions are discussed and defined in this section. The Compliance Status Table in PG&E's NTPR provides preconstruction compliance information for the other issue areas addressed by the Embarcadero – Potrero MND.

Following the discussion of biological, cultural, paleontological, water resources, land use/sensitive receptors, a list of bulleted conditions is presented to define additional information and clarifications regarding outstanding requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions. In these cases, the conditions will not appear in the NTPR mitigation compliance table.

**Biological Resources:** The proposed 230 kV Potrero Switchyard site is a highly disturbed lot within the site of the former Potrero Power Plant site now owned by GenOn Energy, Inc., and adjacent to and east of the existing Potrero Switchyard. Vegetation in this area is largely limited to sparse ornamental shrubs and trees around the property and some minimal ruderal non-native vegetation within the site. There is no tree trimming or removal planned in this portion of the project area. There are no wetlands along the project route. The nearest known wetland is near Pier 96, about 0.5 miles south of Potrero Switchyard (Aspen 2013, MND 5-50). Nesting bird surveys will be conducted between February 15 and August 31. All construction personnel will receive biological resource training prior to starting work.

**Cultural:** The records search for prehistoric resources did not return any finds near the 230 KV Potrero Switchyard site. Historic resources have been documented near the Potrero Switchyard site and include surrounding buildings (Aspen 2013, MND 5-85). Vibration monitoring will take place at the site in compliance with APM CUL-6. An archaeologist will be on site during all ground disturbing work. All construction personnel will receive cultural resource training prior to starting work. In the event that an unanticipated discovery of cultural materials is made within the 230 kV Potrero Switchyard site, the find shall be managed in compliance with the *Archaeological Monitoring and Inadvertent Discovery Plan for the Potrero Portion of the Embarcadero-Potrero 230 kV Transmission Project, City of San Francisco, California* (July 2014 FINAL), prepared by Far Western Anthropological Research Group, Inc.

**Paleontological Resources:** Geologic mapping by Schlocker (1974) was used to determine the underlying geology for each of the project components. Potrero Switchyard is underlain by artificial fill and Mesozoic serpentinite. Serpentinite is a metamorphic rock derived from ultramafic igneous rocks or sediments high in manganese and iron, and low in silica that have undergone high pressure and low temperature metamorphism. Metamorphic processes generally destroy any fossil material that may have been present in the parent rock; therefore, serpentinite is considered to have no paleontological sensitivity (Aspen 2013, MND 5-87 – 5-88).

**Water Resources.** PG&E has prepared an Erosion and Sediment Control Plan as part of a Stormwater Pollution Prevention Plan (SWPPP), which was approved by the San Francisco Public Utilities Commission on August 13, 2014. The Regional Water Quality Control Board has issued a Waste Discharge Identification (WDID) number for the Project (WDID# 2 38C370601). Erosion control and pollution prevention measures in the SWPPP address elements such as track-out controls, stock-pile handling, dewatering discharge, drain inlet protection, and replacement of any disturbed pavement or landscaping.

**Sensitive Land Uses/Noise.** The existing Potrero Switchyard is located on Illinois Street between 22<sup>nd</sup> and 23<sup>rd</sup> Streets in what is known as the Dogpatch neighborhood in the San Francisco Central Waterfront area (Aspen 2013, MND 4-35). The proposed 230 kV Potrero Switchyard is adjacent to and east of the existing switchyard and within the site of the former Potrero Power Plant site now owned by GenOn Energy, Inc. The nearest residence is about 700 feet to the west, on Third Street (Aspen 2013, MND 4-2) Construction notifications were provided to the public with tips on reducing noise intrusion, for example, by closing windows facing the planned construction. PG&E has also specified construction noise reduction measures that require the contractor to ensure all equipment is in good working order, adequately muffled, and maintained in accordance with the manufacturers' recommendations.

### **Conditions of NTP Approval**

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 NTP #1 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 site.
- 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 an active bird nest for a species covered by the Migratory Bird Treaty Act or California Fish and Game Code is found within 50 feet of project work areas, the qualified biologist shall determine appropriate protective measures to reduce the likelihood of nest failure. If an active nest for a special-status bird is found, PG&E shall record the position of the nest in the monitoring report and notify the CPUC. The qualified biologist shall implement buffers and set other proactive measures, as appropriate, to protect special-status nesting birds from construction activities in consultation with CPUC, and as appropriate the California Department of Fish and Wildlife (CDFW) and/or United States Fish and Wildlife Service (USFWS). The Biological Monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. Requests for buffers of less than 50 feet for special-status nesting birds must be submitted to the CPUC's independent biologist(s) for review. .
- 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.

- In the case of an unanticipated cultural resources discovery, the CPUC Environmental Monitor (EM) shall be notified immediately and the find shall be managed in compliance with the *Archaeological Monitoring and Inadvertent Discovery Plan for the Potrero Portion of the Embarcadero-Potrero 230 kV Transmission Project, City of San Francisco, California* (July 2014 FINAL), prepared by Far Western Anthropological Research Group, Inc.
- In regards to APM CUL-6 Vibration to Historic Structures and the Structural Observation for Vibration Monitoring Plan, if at any time during excavation with heavy equipment the structural observer notes any changes in the existing buildings, construction shall cease in the immediate area and CPUC shall be notified immediately.
- 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.
- If groundwater is encountered, PG&E shall contain, test, and submit the results to the CPUC prior to proper disposal.
- PG&E shall submit to the CPUC the signed and approved City of San Francisco permits applicable for this NTP #1 (i.e. excavation and grading permit, etc.) prior to the start of construction.
- 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.
- Per MM AQ-1 Minimize Fugitive Dust, a publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person will respond and take corrective action within 48 hours. The Bay Area Air Quality Management District (BAAQMD) phone number will also be visible to ensure compliance with applicable regulations.
- PG&E shall copy the CPUC on transmission electron microscopy (TEM) air sample results submitted to the BAAQMD every two weeks.
- 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 switchyard 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.

- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Minor Project Change Request shall be submitted for CPUC review.
- If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC EM shall be notified immediately.

Sincerely,

A handwritten signature in blue ink that reads "Billie Blanchard". The signature is written in a cursive, flowing style.

Billie Blanchard  
CPUC Environmental Project Manager

cc: V. Strong, Aspen