PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

June 22, 2017

Jamie Dean, AICP
Senior Land Planner
Pacific Gas & Electric
Environmental Management - Transmission
245 Market Street, Room 1072A
San Francisco, CA 94105

RE: Windsor Substation Project: Minor Project Change #9

Dear Ms. Dean,

On June 12, 2017, Pacific Gas and Electric Company (PG&E) submitted Minor Project Change #9 request for reconfiguration of the distribution line crossing Old Redwood Highway in the vicinity of Starr Road in the Town of Windsor, California.

The CPUC voted on April 3, 2014 to approve the PG&E Windsor Substation Project (Decision D.14-03-031) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2013072033).

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Windsor Substation 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 #9 for a reconfiguration of the distribution line crossing Old Redwood Highway in the vicinity of Starr Road 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 June 12, 2017, are presented below (indented):

> This minor project refinement request number 9 is for a reconfiguration of the distribution line crossing of Old Redwood Highway in the vicinity of Starr Road that will remove the existing overhead diagonal crossing of the intersection. Figure 5.4-1 (Biological Resources Mapset Map 6) of the Final Mitigated Negative Declaration (MND) shows replacement of the existing 12 kilovolt (kV) distribution line crossing Old Redwood Highway diagonally with another overhead line crossing diagonally between poles b9 and b10, located north and south of the intersection of Starr Road. The final engineering design replaces the diagonal overhead crossing of the highway with an underground crossing, perpendicular to the road. The engineering design addresses a clearance issue between

the conductor and adjacent street lights, and maintains the pole heights along Old Redwood Highway described in the Final MND. The design includes:

- changing the replacement pole (b9) on the west side of the highway to a riser pole with an anchor,
- adding a new riser pole (b9a) on the east side of the highway, directly across from pole b9, and
- replacing a communication pole that supports a distribution line with a new pole (b9b) approximately 105 feet south of the new riser pole (b9a) on the east side of the highway.

The riser poles will be approximately 52 feet tall and will have an anchor with an approximately 25-foot lead, in line with the overhead line. The new pole replacing the communication pole will also be approximately 52 feet tall. These pole heights are consistent with the height range of replacement poles described in the Final MND, Section 4.12.1. Additionally, the new riser pole and the new pole replacing the communication pole will be located within the existing north-south utility alignment parallel to Old Redwood Highway. The minor project refinement will remove the segment of existing overhead conductor currently crossing the roadway diagonally.

The methodology to complete the work will be as described in the Final MND, Sections 4.12.1 (Pole Replacement) and 4.12.3 (Underground Installation – Open Trenching). Pole replacement and installation will be performed by equipment staged on the road. Temporary lane closures will occur during pole replacement and installation, and during open trenching. The open trench work will take approximately 1 to 2 days per lane. An encroachment permit request has been submitted to the Town of Windsor for this work.

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 June 13, 2017 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 (MMs) and Applicant Proposed Measures (APMs), and are based on specific site conditions and/or are proposed conditions by PG&E.

Biological Resources: The area along the Old Redwood Highway 12 kV distribution line between the substation site and Windsor River Road is largely residential, commercial, and industrial. The survey area along this alignment is adjacent to ruderal, grassland, and woodland habitats, as well as developed areas (including residences). The line spans and/or is adjacent to numerous roadside ditches, several drainage ditches and swales. The Windsor Site 8 Wetland Delineation Report submitted to the CPUC on January 27, 2012, identified pole b9 as pole A9 on page 6 of Figure 3, at the location of roadside ditch 13 (R13). Section 3.6.4 of the Delineation Report states that the earthen roadside ditches along Old Redwood Highway are not jurisdictional under the Clean Water Act. They collect and convey stormwater runoff associated with the adjacent roadway and surrounding impervious surfaces during, and shortly after, storm events; the roadside ditches also likely receive nuisance water from irrigation runoff and other artificial sources, but show no sign of supporting a continuous flow of water for at least three consecutive months. Also, the ditches contain many culverts along the length of the highway before connecting with Starr Creek, or unnamed drainages that appear to be tributary to Starr Creek. The wetland delineation surveys, which did not identify these ditches as wetlands, noted that the ditches are regularly maintained (evidence of mowed vegetation), and either supported non-wetland species such as perennial ryegrass, Bermuda grass, and nutsedge, or were completely devoid of vegetation. Therefore, the subject roadside ditches are considered non-jurisdictional under Section 404 of the Clean Water Act. In addition, a request for a Lake or Streambed Alteration Agreement pursuant to Section

1602 of the Fish and Game Code was not submitted to the California Department of Fish and Wildlife (CDFW) because CDFW does not regulate connected/disconnected engineered water conveyance systems draining surface runoff, or wetlands that do not have a clear connectivity to a stream.

Further, based on survey results, the pole replacements and work locations along the Highway are located within upland areas and are not within suitable habitat for rare plants and are within ruderal, disturbed, or landscaped locations.

Cultural Resources: The records search for prehistoric resources did not return any finds near the Windsor Substation site or along the Old Redwood Highway distribution line other than the following: Historic resources that have been documented near the Project site include the Northwest Pacific Railroad and associated features (recommended as ineligible for listing in the NRHP and CRHR), the Fulton No. 1 60 kV Power Line (rebuilt in 2009), Old Redwood Highway (continuously used and frequently upgraded), and other historic structures that will be avoided.

Prior to the initiation of construction or ground-disturbing activities, as part of the Worker Environmental Awareness Program (WEAP), PG&E will train all construction personnel to understand the potential for exposing subsurface cultural resources and to recognize possible buried cultural resources. Training will inform all construction personnel of the anticipated procedures that will be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains and their treatment.

As discussed by APM CU-3, in the event human remains are encountered during the Project, work in the immediate area of the find will be halted and the County Coroner will be notified immediately. Work will remain suspended until the Coroner can assess the remains. In the event the remains are determined to be prehistoric in origin, the Coroner will notify the Native American Heritage Commission, who will then identify a Most Likely Descendent. The Most Likely Descendent will consult with PG&E's archaeologist to determine further treatment of the remains.

Paleontological Resources: The geology in the vicinity of the Project consists largely of Halocene and Pleistocene age sedimentary and volcanic rocks. The Project is located on Quaternary sedimentary units which include alluvium, Glen Ellen, Huichica, and Sonoma Volcanics formations. The alluvial sediments are unlikely to contain any significant fossil resources. The sedimentary rocks of the Glen Ellen and Huichica formations have not been identified as important paleontological formations. Sonoma Volcanics are typically deep below the surface, so construction activities would be unlikely to encounter this formation. The UC Museum of Paleontology (UCMP) databases of known paleontological sites in Sonoma County were reviewed by the Applicant to identify the occurrence of fossils in these formations and to determine the likelihood that paleontological resources might be encountered during excavation and grading of the substation site. The UCMP records search indicated that there are 503 fossil locations within Sonoma County, with the closest two specimens collected from locations two to five miles west of the Project substation site.

Hazards and Hazardous Materials. A Hazardous Substance Control and Emergency Response Plan was submitted with NTP Request #1, which was reviewed and approved by the CPUC on June 8, 2016. The Plan prescribes hazardous material handling procedures to reduce the potential for a spill during construction or exposure of the workers or public to a hazardous material. The Plan provides a discussion of appropriate response actions in the event hazardous materials are released or encountered during field activities.

Hydrology and Water Quality. This Project is subject to the requirements listed in the National Pollutant Discharge Elimination System (NPDES No. CAS000002) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (General Permit), Order No. 2009-0009-DWQ2 (CGP) and is managed by the State Water Resources Control Board per the Clean Water Act (CWA) Section 402(b) and 40

CFR Part 123. PG&E has prepared an Erosion and Sediment Control Plan as part of the SWPPP. The Regional Water Quality Control Board has issued a Waste Discharge Identification (WDID) number for the Project (WDID# 469458). 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. PG&E has also prepared a Spill Prevention Containment and Countermeasure (SPCC) Plan, which was included with the grading permit application to the Town of Windsor. Oil-absorbent material, tarps, and storage drums will be present on-site to contain and control any minor releases. Prior to the start of construction, all field personnel shall be required to attend WEAP training, which will include a review of the appropriate application and construction or erosion and sediment control measures. The WEAP will also discuss appropriate hazardous materials management and spill response. No jurisdictional waters will be impacted by the Project; therefore, no additional permits are required.

Sensitive Land Uses/Noise. Reconductoring of the distribution line along Old Redwood Highway includes lands zoned as Service Commercial, Public Institutional, and Medium Density Residential. Construction notifications have been provided to the public prior to the start of construction along with contact information for complaints related to construction activities. 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. Stationary equipment shall be located as far as practical from sensitive noise receptors.

Traffic and Transportation. As required by MM T-2, PG&E has coordinated with emergency service providers to avoid restricting movements of emergency vehicles. Police departments, fire departments, ambulance services, and paramedic services serving the Project area were notified in advance by PG&E of the proposed locations, nature, timing, and duration of any construction activities and advised of any access restrictions that could impact their effectiveness. At locations where roads will be temporarily blocked, work crews shall be ready at all times to accommodate emergency vehicles through immediately stopping work for emergency vehicle passage and/or facilitating the use of short detours and alternate routes in conjunction with local agencies. As required by MM T-3, PG&E consulted with Sonoma County Transit District prior to construction to reduce potential interruption of bus transit services. If necessary, PG&E shall arrange for transit bus routes to be temporarily rerouted until construction in the vicinity is complete. Documentation of coordination with emergency services providers and Sonoma County Transit District has been provided to the CPUC. Encroachment permits from the Town of Windsor shall be submitted to the CPUC prior to the start of construction.

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

- All applicable Project MMs, 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. All permits and plans shall be made available to the CPUC EM upon request.
- PG&E shall submit the Town of Windsor traffic encroachment permit to the CPUC prior to the closure of any lanes on Old Redwood Highway.
- All crew members shall be WEAP trained prior to working on the Project as described by APMs BIO-1, BIO-3, CU-1, HM-3, and WQ-3, and MM B-1. A log shall be maintained on-site with the names of all crew

personnel trained. The WEAP training brochure can be provided in Spanish or other languages if appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.

- As described in MM B-1 and MM B-4, a pre-construction wildlife survey and nesting bird survey will be conducted within 7 days prior to the start of construction activities to identify any special-status species, nesting birds or mammals, and occupied burrows in the substation site. Should a sensitive wildlife species be found, CDFW and/or USFWS will be contacted immediately, as well as the CPUC EM.
- In the case of an unanticipated cultural or paleontological resources discovery, the CPUC EM shall be notified immediately.
- As described in APMs WQ-1 and WQ-2, all BMPs will be on-site and ready for installation before the start of construction activities and the SWPPP shall be implemented and monitored during construction. As described in APM WQ-5, oil-absorbent material, tarps, and storage drums will be present on-site to contain and control any minor releases. The CPUC EM shall be notified immediately of all spills. If a reportable spill occurs, as defined by the Hazardous Substance Control and Emergency Response Plan, immediate telephone notification shall be made to Cal EMA and the National Response Agency.
- If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC EM shall be notified immediately.
- 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.

Sincerely,

Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen