

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 12, 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 #10

Dear Ms. Dean,

On August 15, 2017, Pacific Gas and Electric Company (PG&E) submitted Minor Project Change #10 request for the use of an additional temporary staging yard at a PG&E-owned property located at 1054 Mitchell Lane in the Town of Windsor, California. The CPUC (Aspen) sent PG&E a data request on August 16, 2017, and PG&E responded on August 28, 2017. As a result of subsequent discussions with the CPUC and further reconnaissance of available alternative sites, on September 11, 2017, PG&E submitted Revised Minor Project Change #10 with a new location at 8900 Windsor Road in the Town of Windsor at the southern end of the Project for the additional temporary staging yard.

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 #10 for the use of an additional temporary staging yard at 8900 Windsor Road is granted by CPUC based on the factors described below.

PG&E Minor Project Change Request. Excerpts from the PG&E Revised Minor Project Change request, received September 11, 2017, are presented below (indented):

The proposed staging area is an approximately 38,000-square-foot portion of a property located at 8900 Windsor Road. The Windsor Road site is located west of Highway 101 at the intersection of Windsor Road and Windsor River Road, and is bounded by Windsor Road on the west, a residential neighborhood on the south, Sonoma-

Marin Area Rail Transit (SMART) railroad tracks on the east, and Windsor River Road on the north. The southernmost pole of the reconductoring alignment along the Fulton Line is on the northwest corner of the intersection of Windsor Road and Windsor River Road. The fenced parcel is owned by SMART and leased to Denno Enterprises, which is using the site as a yard for staging construction vehicles and trucks.

SMART has been contacted and is amenable to Denno Enterprises sub-leasing to PG&E. At the time PG&E viewed the site on September 6, 2017, the parcel was partially graveled and had some areas covered in grasses and weeds. Recently, approximately 14,000 square feet has been graveled, and there are piles of gravel onsite to complete the remaining area. PG&E would not need to perform any other site preparation to use the location as a staging area. Access would be via an existing driveway onto the property from Windsor Road, using gates in the fence installed surrounding the site.

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 and that the subject request was within the geographic boundary of the Project study area. This review also included a visit of the subject site on September 6, 2017 by the CPUC Environmental Monitor (EM). The following discussion summarizes this analysis for aesthetics, air quality, biological, cultural, hydrological resources; sensitive land uses/noise; and traffic and transportation. 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.

Aesthetics: The Windsor Road parcel is located in an area that is zoned Town Center Commercial. The surrounding areas contain a mix of uses, including residential, commercial, and vacant land. The site is currently being used as a construction staging area. Construction-related visual effects would include the presence of equipment, materials, and crews at the site. However, these effects would be similar in nature to those currently occurring at the site. Additionally, use of the site would be temporary and short-term (lasting only the duration of construction, estimated to be approximately four months) and would not substantially alter the existing visual character or quality of the overall landscape setting.

Air Quality: Use of the Windsor Road staging area would require the use of a forklift to load/unload materials from the railcar, and truck trips by various other construction vehicles and equipment to deliver materials and crew. The number of truck trips required would not vary significantly from the number of trips analyzed in the Mitigated Negative Declaration (MND) because staging activities that were slated to occur at the Windsor Substation site would simply be transferred to the Windsor Road staging area. Use of the staging area at Windsor Road would be in accordance with all of the applicant proposed measures (APMs) outlined in the MND for the project, including maintaining reduced vehicle speeds, and properly maintaining construction equipment. As the site is graveled, measures regarding dust control should not be needed, but will be implemented should dust be caused by construction traffic.

Biological Resources: The Windsor Road site is a graveled yard in an urban area of the Town of Windsor. PG&E's biologist inspected the site and did not identify any biological resources. No trees or vegetation would need to be removed to facilitate use of the site.

Cultural Resources: The site is located within the 0.25-mile cultural records search area conducted for the project. The records search did not identify any existing records for this parcel or the adjacent parcels. The site is currently being used as a construction yard, and would not require any ground disturbance to prepare it for use by PG&E as a temporary staging area. Use of the site would occur in accordance with all cultural resources-related APMs and mitigation measures outlined in the MND.

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 or wetland areas are located within the Windsor Road temporary staging yard; therefore, no additional permits are required.

Sensitive Land Uses/Noise. The nearest sensitive receptor is a group of single-family houses across Windsor Road from the site. The site is currently being used as a construction yard. As described in the MND, PG&E would limit use of the site to the hours of 7 a.m. to 7 p.m. Monday through Saturday, to the extent feasible, and implement the specified construction noise-reduction measures in the Final MND. No nighttime work is anticipated to be required at the site; however, if any nighttime work is needed because of clearance restrictions, PG&E would take appropriate measures to minimize disturbance to local residents, including contacting nearby residences to inform them of the work, in accordance with APM NO-2.

Traffic and Transportation. During use as a staging area, it is anticipated that approximately 10 round-trip vehicle trips per day would occur, 5 to 7 days per week, for approximately four months. The majority of construction-related traffic would access the staging area by exiting Highway 101, travelling west along Windsor River Road, turning south onto Windsor Road, and making a left turn to enter the site. To eliminate potential traffic congestion caused by making multi-point turns and to avoid fencing and other obstacles, large trucks transporting poles would exit Highway 101 at Shiloh Road, travel north along Windsor Road, and then make a right hand turn to enter the site. Similar to the analysis of using the substation site for staging, only periodic and temporary traffic slowdowns may occur while equipment is moving along public roadways to and from the staging area.

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 property owner approval for use of the site as a staging area to the CPUC prior to mobilization.
- 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 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.
- 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,

A handwritten signature in blue ink, appearing to read "Eric Chiang", with a long horizontal line extending to the right.

Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen