

PUBLIC UTILITIES COMMISSION

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June 15, 2016

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: Notice to Proceed #1

Dear Ms. Dean,

On May 17, 2016, Pacific Gas and Electric Company (PG&E) submitted a Notice to Proceed (NTP) request to the California Public Utilities Commission (CPUC) for the Windsor Substation Project, in the Town of Windsor, Sonoma County, California. Under this NTP request, PG&E is seeking CPUC authorization to construct the substation component of the Project.

The PG&E Windsor Substation 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 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.

As currently proposed by PG&E, the Windsor Substation Project will be constructed in two phases and separate NTPs will be issued for each phase. This is a typical process for substations and transmission line projects. Given that the Windsor Substation 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.

Under this NTP request, PG&E is also proposing three Minor Project Changes that were not included in the project description in the MND. The MMCRP acknowledges that Minor Project Changes 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 by the requested Minor Project Changes, and that no new impacts or increase in impact severity would result. Further, Minor Project Changes are reviewed to ensure that they are within the geographic boundary of the project study area and that 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.

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.

NTP #1 for the construction of the substation is granted by the CPUC based on the factors described below.

PG&E NTP Request

A detailed description of the substation component of the Windsor Substation Project is included in the MND and is summarized as follows:

The Windsor Substation will consist of electrical equipment needed to operate the substation, a looped transmission line into and out of the substation, and distribution lines out of the substation. The fenced footprint of the facility will cover approximately 2.6 acres. Site access will be via paved driveways to two gates on the east side of the site, from Old Redwood Highway.

Electrical equipment required for the three-bank substation will consist of the following at ultimate 115 kV build-out:

- Three 115 kV bus structures
- Six 115 kV circuit breakers
- Three 115/12 kV power transformers
- Eighteen 115 kV disconnecting switches
- Three 12 kV metal-clad switchgear enclosures
- Twelve 12 kV distribution circuits
- Three 30 MVA power transformers
- Connection of the new substation to an existing 60 kV powerline by way of a new tubular steel pole (TSP) replacing an existing wood pole
- Two 42-foot-high dead-end structures within the substation supporting the 60 kV powerline entering and existing the substation

Site preparation will begin with removal of existing asphalt paving and concrete foundation remnants from previous buildings, clearing of vegetation, and grading of the substation pad. Excavation for the substation's foundations will begin after site grading is complete. Up to 250 cubic yards of excess soil will be generated in this phase of the project. Construction of the subsurface ground grid will follow grading and excavation. At the same time, the security wall, fencing, and paved interior road will be installed, and aggregate will be placed throughout the remainder of the enclosed site. With the site secured, excavation for subsurface footings for all the aboveground structures will begin. Reinforced concrete footings and slabs will be poured for structure and equipment support. After the concrete is cured, the aboveground steel structures, circuit breakers, transformers, switchgears, buses, dead ends, and other electrical equipment, including associated control system hardware, will be installed.

Structures will be erected to support buses, switches, overhead conductors, instrument transformers, and other electrical equipment, as well as to terminate incoming circuits. Structures within the substation will be grounded to the station-grounding grid. Equipment will be bolted or welded securely to slabs and footings to exceed Uniform Building Code seismic requirements. Additional equipment that will be installed includes high-voltage circuit breakers and air switches, tie structures and buswork, high-voltage instrument transformers and line traps, control and power cables, metering, relaying, and communication equipment.

Minor Project Changes

PG&E submitted the following Minor Project Change (MPC) information with NTP #1, along with figures and photographs. CPUC has reviewed each MPC request and has confirmed that each request satisfies the MPC review criteria as presented above.

- **MPC #1: Configuration of the Spill Prevention, Control, and Countermeasure Pond and Stormwater Flow**

Section 4.9.5 of the MND (Drainage) states that runoff from the proposed substation pad would flow into a Spill Prevention Control and Countermeasure (SPCC) retention pond on the western end of the site (near the railroad right-of-way). The preliminary design for the pond is shown in Figure 4-4 (Typical Three Bank Substation) and is depicted as being in the corner of the substation. Section 4.9.1 of the MND states that the SPCC pond would be designed to contain 110 percent of the transformer's coolant volume (5,500 gallons).

The final design includes two SPCC ponds along the western boundary of the substation, each within the substation wall and collecting stormwater runoff from gutters within the substation facility, as shown in drawing 4116382 Rev 2 (Attachment G). The SPCC ponds, with a combined capacity of approximately 11,000 gallons, will have concrete walls and bottoms. The two SPCC ponds will be within a larger stormwater detention basin that will have an earthen bottom, and will connect to the existing stormwater system at the site. This refinement has been made to maximize on-site percolation of water and reduce the rate of flow off site. The final design for the SPCC ponds provides sufficient capacity to accommodate future equipment, and is consistent with the project description that the substation would be designed and built to accommodate future equipment, therefore limiting construction necessary for future upgrades (Page 4-1 of the MND).

The final grading design for the site also includes directing stormwater runoff from the eastern portion of the site adjacent to Old Redwood Highway, where no equipment will be located, to a concrete ditch to be installed adjacent to the outside of the perimeter wall facing Old Redwood Highway (see Attachment G, drawing 4116388 Rev 3). The ditch will be approximately 10 inches deep, 3 feet wide, and 300 feet long, and will drain to the existing stormwater system at the site adjacent to Herb Lane. This refinement was made to limit stormwater runoff draining to the SPCC ponds to runoff associated with equipment containing hazardous materials.

These refinements do not involve substantial changes to the project or project circumstances as described in Section 4.9.5 of the MND, and will not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts. Although the configuration of the SPCC pond will change and increase in number and capacity, the ponds will still be located inside the graveled yard and substation perimeter wall, where, as described in the MND, no sensitive biological resources or cultural resources are present. Likewise, there are no sensitive biological resources or cultural resources present in the area where the concrete ditch will be installed along the substation wall facing Old Redwood Highway and would not result in any additional land disturbance than initially proposed. The minor refinements do not conflict with any applicant proposed measures or mitigation measures, and are consistent with the plans submitted to the Town of Windsor for a grading permit and under review by the Sonoma County Water Authority to which the Town of Windsor is deferring to for review of the site drainage plan.

- **MPC #2: Use of Water Truck or Driwater Pods Instead of Irrigation System for Landscaping**

The MND states on Page 7-19 that the final stage of construction would be landscaping, including installation of an irrigation system, and the Town of Windsor may supply potable water for irrigation from a valve box along Old Redwood Highway, or water may also be obtained from a well adjacent to Herb Road or from construction baker tanks.

While installing an irrigation system was anticipated, the MND identifies a plant palette comprised of drought tolerant plants that would not require regular water once established (Appendix C of the MND, Figure 5.1-3). The duration of initial watering until landscaping is established would depend on the timing of landscape installation and rainfall events, but typically would be required only during the first one to three years after planting. In addition, because the substation is automated and does not have permanent onsite employees, no water service is needed. Given these facts and considering the drought conditions in California, PG&E proposes to obtain water for landscaped plants just until they are established and no longer require watering. The water would be obtained from the Town of Windsor valve box along Old Redwood Highway, from water trucks, or from driwater pacs placed adjacent to plantings. This modification would minimize water use by limiting onsite water consumption to the time period that it takes the plants to become established.

Landscaping may also be installed following installation of the perimeter wall instead of during the final stage of construction.

This minor refinement to the delivery method of landscape irrigation does not involve substantial changes to the project or project circumstances, will not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts, and will not conflict with any applicant proposed measures, mitigation measures, or applicable guideline, ordinance, code, rule, regulation, order, decision, statute or policy.

- **MPC #3: Replacement of Culverts in Existing Roadways Entering Substation Site and Herb Lane**

The existing culvert in each of the two roadways entering the substation site and the culvert at the entrance to Herb Lane will be replaced with new culverts, measuring a minimum of 18 inches in diameter, as they are in poor condition.

This refinement does not involve substantial changes to the project or project circumstances, and will not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts. As described in the MND, no sensitive biological resources or cultural resources are present. The roadside ditch is a non-relatively permanent water and is not a jurisdictional waterway (Table 5.4-3 of the MND). The culverts will be replaced as part of constructing the paved driveways into the substation (MND Section 4.9.1 and Figure 4-4) and use of Herb Lane access and as depicted in drawing 4116377, Rev 3 (Attachment G). Replacement of the culverts during road construction would not result in any additional land disturbance than initially proposed. The minor refinement does not conflict with any applicant proposed measures or mitigation measures, and is consistent with the plans submitted to the Town of Windsor for a grading permit.

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. The Compliance Status Table in PG&E's NTP request provides preconstruction compliance information for the issue areas addressed by the Windsor Substation Project Final MND. The following contains a status of applicable mitigation measures and APM required submittals, including any outstanding requirements:

Aesthetics: The substation site is bounded by Herb Road on the northwest, Old Redwood Highway on the northeast and east, rural residences on the north, a school bus yard on the southeast, and the railroad right-of-way and more rural residences to the west. The substation property is zoned for Service Commercial. Although currently vacant, it contains a remnant foundation and paving from its former industrial use. The substation site is 4.1 acres: the walled/fenced substation footprint will occupy 2.6 acres within the property. A 10-foot-high prefabricated concrete wall will border the north, east, and west sides of the 2.6-acre substation; chain link mesh fabric fencing will enclose the south side. The substation site will have landscaping comprised of trees and shrubs along Herb Road and along the east edge of the substation site in the setback area from Old Redwood Highway to provide additional screening and reduce project visibility.

Biological Resources: The Windsor Substation site is relatively flat and is dominated by concrete foundations, asphalt, and gravel. The western and southern portions of the site contain ruderal/disturbed vegetation. There are mature trees along the northern, southern, and western property lines. There is a seasonal swale along parts of the southern and western boundaries, a small drainage ditch along the northern boundary, and a roadside ditch at the eastern edge of the property along Old Redwood Highway. It is anticipated that approximately three trees will need to be removed during construction. Wetland jurisdictional areas will be avoided and protected by Environmentally Sensitive Area (ESA) fencing and silt fencing per the Stormwater Pollution and Prevention Plan (SWPPP). PG&E shall confer with California Department of Fish and Wildlife (CDFW) on nesting bird survey methodology and conduct nesting bird surveys during the avian nesting season (February 1 through September 15). Resumes of qualified biologists were submitted with NTP Request #1 to the CPUC; these were reviewed and approved May 18, 2016. Preconstruction surveys for special-status bats

were conducted and a report submitted to the CPUC, which was reviewed and approved on May 18, 2016. Preconstruction surveys for special-status species shall be conducted prior to construction. All construction personnel shall receive biological resource training as part of the Worker Environmental Awareness Program (WEAP) prior to starting work.

Cultural Resources: The records search for prehistoric resources did not return any finds near the Windsor Substation site. Historic resources have been documented near the Project site and 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 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 Holocene and Pleistocene age sedimentary and volcanic rocks. The substation site 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 proposed 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. Most previously identified fossils within Sonoma County were found in the Wilson Grove and Petaluma formations. These formations are unlikely to be encountered during Project construction (PG&E 2010).

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 that hazardous materials are released or encountered during field activities. The WEAP will communicate environmental concerns and appropriate work practices to all construction field personnel. The training program will emphasize site-specific physical conditions to improve hazard prevention, and will include a review of the Hazardous Substances Control and Emergency Response Plan and SWPPP. As required by MM HAZ-1, proper notification shall be made in the event of spills and if contaminated soil is encountered, PG&E shall ensure proper sampling, data review, regulatory coordination, and documentation of compliance.

Hydrology & 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 has been included with the grading permit application to the Town of Windsor. The SPCC plan includes engineered methods for containing and controlling an oil release, including a water-collection system and retention ponds equipped with an oil/water separator. 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 at the substation site; therefore, no additional permits are required.

Sensitive Land Uses/Noise. The Windsor Substation site is located west of Highway 101 and is bounded on the north by Herb Road, on the west by the Northwest Pacific Railroad right-of-way, and on the east by Old Redwood Highway. The adjacent parcels to the north and west each contain two single-family dwelling units. One residence is located on the east side of Old Redwood Highway. The nearest homes are 60 feet north and 160 feet west of the Project substation parcel boundary and 125 feet north and 200 feet west of the proposed substation fence line. Construction notifications shall be 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 shall coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles. Police departments, fire departments, ambulance services, and paramedic services serving the project area shall be notified 30 days 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 shall consult with Sonoma County Transit District at least one month 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. PG&E shall obtain approval from SMART to encroach on the railroad right-of-way. Documentation of coordination with emergency services providers and Sonoma County Transit District, as well as SMART approval for encroachment on the railroad right-of-way, shall be provided to the CPUC prior to the start of construction.

Conditions of NTP Approval

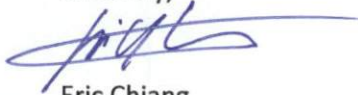
The conditions noted below shall be met by PG&E and its contractors:

- 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. All permits and plans shall be made available to the CPUC Environmental Monitor (EM) upon request.
- The Town of Windsor grading permit and SPCC plan shall be provided to the CPUC prior to the start of construction.
- As required by MM LU-1, prior to construction, the Applicant shall give at least 10 days advance notice of the start of any construction-related activities. Notification shall be provided by posting signs along affected roadsides to tell the public about the work. The posted signs shall: describe where and when construction is planned, and provide contact information for a point of contact for complaints related to construction activities. Prior to commencing ground disturbing activities, the Applicant shall submit a copy of the template used for the posted sign. *Reporting of Complaints*. The Applicant shall document all complaints and strategies for resolving complaints in regular reporting to the CPUC.
- 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 mitigation measure (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 APM BIO-4, a pre-construction wildlife and plant survey will be conducted 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 or plant species be found, CDFW and/or USFWS will be contacted immediately, as well as the CPUC EM.
- As described in APM BIO-5, a biological monitor will be on-site during grading activities and installation of the silt fence around the substation site perimeter.
- As described in APM BIO-7, if special-status plant species are found during any of the special-status plant surveys, PG&E will modify the project to avoid impacts to special-status plant species. If identified special-status plant species cannot be avoided, PG&E will consult with the appropriate resource agency and comply with permit conditions to ensure that the project will not have a substantial adverse effect on such species, either directly or through habitat modification.
- As described in APM BIO-11 and APM BIO-12, badger dens will be clearly demarcated with appropriate flagging and signs and avoided if possible. If a badger den cannot be avoided, CDFW will be consulted to discuss the possible relocation of the badger.
- As required by MM B-1 and supplementing APMs BIO-1, BIO-4, and BIO-5, PG&E shall conduct WEAP training that also addresses California Species of Special Concern and provide brochures addressing all potentially affected special-status species. Pre-construction surveys by a qualified biologist (approved by the CPUC) shall be conducted within 7 days of construction activities and biological resources monitoring shall be required on a daily basis during all construction activities near sensitive resources.
- In accordance with MM B-2, prior to the onset of construction activities, a qualified biologist (approved by the CPUC) shall delineate any wetland or water features within the substation site as environmentally sensitive areas (ESA) using clear markers. Construction crews shall be provided with maps of environmentally sensitive areas. Staking for ESA fencing and construction work areas shall be reviewed and approved in the field by the CPUC EM prior to the start of construction.
- If a northwestern pond turtle is found during preconstruction surveys or during construction, avoidance and/or relocation measures as specified in MM B-3 will be implemented.

- Preconstruction surveys for nesting birds shall be conducted during the avian nesting season (February 1 through September 15), the establishment of buffers and their reductions, and monitoring and reporting shall occur in accordance with MM B-4. Requests to reduce standard buffers must be submitted to the independent avian biologist(s) to be reviewed in coordination with the CDFW. If the qualified wildlife biologist determines that there are nests of listed or fully protected bird species within 500 feet of project activities, consultation with CPUC and CDFW (and USFWS as appropriate) shall be required to discuss how to implement the project and avoid "take." If construction occurs during the avian nesting season, prior to the commencement of construction, PG&E shall confer with CDFW on nesting bird survey methodology and provide appropriate documentation of consultation to the CPUC EM.
- In the case of an unanticipated cultural or paleontological resources discovery, the CPUC EM shall be notified immediately.
- As described in 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.
- If contaminated soil is encountered during construction, the requirements of MM HAZ-1 shall be implemented.
- 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.
- As required by MM T-2, PG&E shall submit documentation of notification and coordination with emergency service providers to the CPUC prior to the start of construction.
- As required by MM T-3, PG&E shall consult with Sonoma County Transit District (SCTD) at least one month prior to construction to reduce potential interruption of bus transit services. Also, PG&E shall obtain approval from SMART to encroach on the railroad right-of-way. PG&E shall submit documentation of coordination and approval to the CPUC prior to the start of construction.
- 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