

## PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298



February 7, 2018

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 #11

Dear Ms. Dean,

On February 1, 2018, Pacific Gas and Electric Company (PG&E) submitted Minor Project Change #11 request to increase the height of pole a35 on the Fulton No. 1 60 kV line in support of the Windsor Substation Project 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 acknowledges that the Mitigated Negative Declaration (MND) for the Project was based on preliminary designs and minor changes may be necessary to complete construction, such as final engineering refinements. The MMCRP also acknowledges that 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. 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 #11 for the increase in height of pole a35 on the Fulton No. 1 60 kV line in support of the Windsor Substation Project 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 February 1, 2018, are presented below (indented [brackets for clarifications]):

The Final MND for the project describes rebuilding a portion of the existing overhead Fulton No. 1 60 kV line and installing two underbuilt distribution circuits (Section 4.12.1, Reconductoring of Distribution Line and Power Line Underbuild). Section 4.12.1 (Pole Replacement) of the Final MND states that existing poles are approximately 45 feet tall and new poles would be approximately 20 feet higher, or about 65 feet tall.

It has been identified that the replacement pole for pole a35 on the Fulton alignment needs to be approximately 76 feet tall. The reason this pole needs to be taller is that along this portion of the power line the framing is transitioning between types of framing, and the span length between the poles is such that the shorter pole does not provide sufficient separation distance [vertically] between the conductors.

Pole a35 is located within PG&E's existing easement in the backyard of a residence on the corner of Railroad Avenue and 2nd Street, and is partially screened from view by mature trees and the property. From the east side of the railroad tracks, the top of the pole is visible when traveling south along Railroad Avenue or north on Wild Oak Drive. From the west side of the railroad tracks, the pole is mostly screened by trees when viewed from Emily Road Circle.

Apart from aesthetics, the change in the pole height would not result in any other changes as the construction technique will be the same. As pole a35 is in an urban area, there are no views of the pole from a distance, and in closer proximity the pole is partially screened by vegetation. This minor project refinement does not involve substantial changes to the project or project circumstances as described in the Final MND, and will not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts.

### **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 January 29, 2018 by the CPUC Environmental Monitor (EM). The following discussion summarizes this analysis for aesthetics since that is the only resource issue area the Minor Project Change possibly affects. 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.

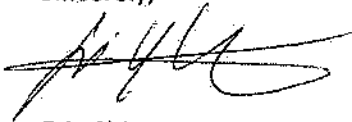
**Aesthetics:** It has been identified that the replacement pole for pole a35 on the Fulton alignment needs to be approximately 76 feet tall, rather than the approximate 65 feet specified in the Final MND. The reason this pole needs to be taller is that along this portion of the power line the framing is transitioning between types of framing, and the span length between the poles is such that the shorter pole does not provide sufficient separation distance [vertically] between the conductors. There are no Key Observation Points (KOPs) along the Fulton No. 1 line "because the distribution line work is updating existing landscape elements rather than creating new ones" (MND Section 5.1.2). Because pole a35 is in an urban area, there are no views of the pole from a distance, and in closer proximity the pole is partially screened by vegetation. The change in pole height would not result in any other changes and PG&E will utilize the same construction techniques discussed in the Final MND. Therefore, this Minor Project Change would not substantially alter the existing visual character or quality of the overall landscape setting.

### **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.

- 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,



Eric Chiang  
CPUC Environmental Project Manager

cc: V. Strong, Aspen