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April 26, 2018

Mr. Eric Chiang  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Pacific Gas and Electric Company Martin Substation Extension / Egbert Switching Station Project (A. 17-12-021) Response to California Public Utilities Commission Application Data Request No. 2**

Dear Mr. Chiang:

This letter is in reply to your April 12, 2018, letter in which you request certain additional information regarding Pacific Gas and Electric Company's (PG&E's) application (A.17-12-021) for a Certificate for Public Convenience and Necessity for the Egbert Switching Station Project (project). The original text for each data request from the California Public Utilities Commission (CPUC) is included, followed by PG&E's response.

There are three attachments to this letter to support PG&E's response:

- |              |   |
|--------------|---|
| Attachment 1 | San Francisco Public Meeting April 3, 2018 Written Comment Copies |
| Attachment 2 | PG&E Egbert Switching Station Project – Bat Habitat Assessment    |
| Attachment 3 | Example Expanded Metal Mesh Specifications and Sample Images      |

***CPUC Data Request Item 1 - General***

- a) Please provide copies of the written comments received at the public meeting held in San Francisco on April 3, 2018. Following review of the public comments additional requests may be submitted regarding data needs.

***PG&E's Response***

- a) Please find copies of the written comments received at the public meeting held in San Francisco on April 3, 2018 provided as Attachment 1.

***CPUC Data Request Item 2 - Air Quality / Health Risks***

- a) Based on public concerns expressed at the public meeting regarding potential health risks due to construction, please provide a construction Health Risk Assessment for the Egbert Switching Station site.

***PG&E's Response***

- a) The concerns about potential air quality impacts expressed at the April 2018 public meeting regarding potential health risks due to construction are addressed on PEA pages 3.3-20 through 3.3-21 and is quoted below. In Section 3.3.4.3, the potential for impact to sensitive receptors (including residences) to substantial pollutant concentrations during

construction is addressed. A conclusion of no impact is reached. The applicability of a Health Risk Assessment (HRA) to construction activities is discussed as well.

Residences. To the northwest of Egbert Switching Station site is the Portola Place residential community. The closest residence to the switching station within this community is about 50 feet away, across Egbert Avenue to the northwest on Kalmanovitz Street. The nearest residence to the property line of the existing Martin Substation is located within 150 feet on Geneva Avenue. Construction activities associated with the proposed transmission lines will occur in both highly industrialized areas and residential areas, with the nearest residential areas being approximately 50 feet away from the work area.

Because the project's construction emissions are short-term and, absent implementation of APMs, do not exceed BAAQMD's significance threshold for any criteria air pollutant, the project will not have a significant impact on the nearby sensitive receptors during construction.

Furthermore, as described in BAAQMD's CEQA Guidelines, the generation of toxic air contaminants would be temporary as a result of the variable nature of construction activities, "especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations" (BAAQMD, 2017c).

[Diesel particulate matter] DPM is the only toxic air contaminant expected to be emitted during construction, in this case as a constituent of construction equipment exhaust. Based on Table 2-5-1 of BAAQMD Regulation 2-5, DPM contributes to cancer and chronic, noncancer risk, but not to acute, noncancer risk. "Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities" (BAAQMD, 2017c). As a result, cancer and noncancer (chronic and acute) risks were not estimated from project construction. Although several schools and residences are located within 1,000 feet of the project construction areas, construction in a single area is not expected to last more than a few days at a time. In addition, "concentrations of mobile-source DPM emissions are typically reduced by 70 percent at a distance of approximately 500 feet" (BAAQMD, 2017c). It is also expected that implementation of [Applicant Proposed Measures] APMs [Air Quality] AQ-1 and 2 and compliance with [California Air Resources Control Board] CARB's [Airborne Toxic Control Measures] ATCM for DPM from Portable Engines Rated at 50 [horsepower] and greater, as applicable, will reduce DPM emissions.

BAAQMD 2017c reference link: [http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en)  
CAPCOA 2009 reference link: [http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA\\_HRA\\_LU\\_Guidelines\\_8-6-09.pdf](http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf)

While project construction emissions will be short-term and will not exceed BAAQMD's significance threshold for any criteria air pollutant, PG&E proposes to further minimize potential air quality impacts during construction with the implementation of APM AQ-1, Minimize Fugitive Dust, and APM AQ-2, Minimize Construction Exhaust Emissions.

APM AQ-1 is consistent with the BAAQMD CEQA Guidelines to minimize fugitive dust emissions through:

- applying water or non-toxic soil binders to exposed soil surfaces;
- covering haul loads of loose materials;
- limiting vehicle speeds on unpaved roads;
- completing restoration or other stabilization of unpaved surfaces as soon as possible after grading;
- daily street sweeping if visible soil material from construction is present; and
- posting a publicly visible sign with a telephone number and person to contact regarding dust complaints along with the BAAQMD's telephone number.

APM AQ-2 is included to further minimize exhaust emissions (particulate matter) during construction even though exhaust emissions are expected to be below the significance thresholds. APM AQ-2 focuses on minimizing unnecessary construction vehicle idling time and maintaining all construction equipment in accordance with manufacturer's specifications.

A Health Risk Assessment (HRA) is not typical for the proposed project type and the current models and methods for a HRA do not correlate well with the temporary and highly variable nature of construction activities. The Bay Area Air Quality Management District (BAAQMD) in its May 2017 CEQA Air Quality Guidelines references information from the guidance document, *Health Risk Assessments (HRA) for Proposed Land Use Projects*, from the California Air Pollution Control Offices Association (CAPCOA, 2009). The guidance document describes two types of land use projects that have the potential to cause long-term public health risk impacts. Type A is a land use project with toxic emissions that impact receptors (e.g., combustion related power plants, gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, quarry operations, and other stationary sources that emit toxic substances). Type B is a land use project that will place receptors in the vicinity of existing toxics sources (e.g., residential, commercial, and institutional developments proposed to be located in the vicinity of existing toxic emission sources such as: stationary sources, high traffic roads, freeways, rail yards, and ports). The proposed Egbert Switching Station Project is not a stationary source that will emit toxic substances (Type A) or a residential, commercial, and institutional development to be located in the vicinity of existing toxic emission sources (Type B).

### ***CPUC Data Request Item #3 – Biological Resources***

- a) A formal delineation will determine the extent of (boundaries of) the potentially jurisdictional features so that sufficient avoidance and protection measures, including SWPPP measures can be implemented. The PEA identifies two drainage features (both identified as riverine intermittent streambeds), and a wetland feature (identified as palustrine emergent persistent wetland) within the biological resources survey area. These features were identified during the project's biological reconnaissance surveys. Although the large majority of the project will occur in developed and urbanized areas, a wetland delineation should be performed to identify and more clearly define the jurisdictional extent of features in the project area. The delineation should include those features noted above and any other aquatic features that may not have been previously identified via review of NWI maps (which are typically not reliable for project level analyses) and the general biological field reconnaissance. The delineation should also be completed to

satisfy CPUC PEA requirements (per CPUC Checklist and as described in Table 1-2 of the PEA).

- b) See "a)" above. The SWPPP is sufficient to protect wetland features, provided the extent of these features are mapped by means of a formal wetland delineation.
- c) Bat sensitivity to noise is very different than it is for humans. Recent studies have documented that noise from nearby handheld survey equipment caused bats to abandon a roost, while noise from heavy equipment in the same area did not. If such equipment causes bats to abandon a maternity roost in a bridge or other structure, that would be considered a direct impact under CEQA. Similarly, although foraging habitat is not limited in the vicinity of the project, bats are known to forage in specific areas adjacent to their roosts. Even short term changes in foraging success of lactating females due to changes in lighting or other roost disturbance could affect the viability of their pups during the breeding season. It is not sufficient to say disturbance would be minor and wouldn't affect foraging success without knowing if roosts exist in the vicinity of project work. A mitigation measure is recommended that specifies a preconstruction survey for bat roosts be performed by a qualified biologist within 7 days prior to the onset of construction, and that project activities occur during daylight hours in the vicinity of any active roosts. Noise disturbance near active roosts should be limited based on the location of the roost and planned activity in the vicinity of the roost, as determined by a qualified biologist.

#### ***PG&E's Response***

- a) PG&E would have provided a formal delineation as part of the PEA biological resources impact assessment if the project was proposed to fill or discharge to an aquatic feature or if any drainages were not clearly outside project work areas. Page 3.4-14 of the PEA describes the location of the potentially jurisdictional features in relationship to the nearby work areas. The boundaries of the features are not within a roadway or within the Martin Substation fenced area where work will occur. No potentially jurisdictional features or drainages are located in the proposed work areas that are unpaved (the proposed switching station site, the 200 and 400 Paul Avenue parcels, or the median on Mansell Street at San Bruno Avenue).

The purpose of a SWPPP includes keeping sediments out of storm water sewers and drainages that may discharge to waters of the U.S. or state, whether or not they are jurisdictional. Protective measures to control construction-related stormwater runoff from project work areas will be implemented regardless of whether potentially jurisdictional features are present outside a project work area.

- b) See "a)" above. The project SWPPP will implement best management practices regardless of adjacent use or resource.
- c) To address the potential for roosts in the vicinity of project work, PG&E requested that a Bat Biologist (Dave Johnston, Ph.D. H.T. Harvey & Associates), conduct a bat habitat assessment for the proposed project. Please see attached PG&E Egbert Switching Station Project – Bat Habitat Assessment letter report (Attachment 2). PG&E proposes the following Applicant-Proposed Measure (APM) BIO-4 as recommended by the consultant Bat Biologist based on the habitat assessment to further reduce any potential less-than-significant impact to bats during project construction.

**Proposed APM BIO-4: Avoid impacts to potential maternity colony bat habitat.**

A preconstruction survey for maternity colonies of bats in the structures on the proposed Egbert Switching Station site will be conducted prior to removal of the structures. These surveys at the proposed switching station site would preferably be conducted during the maternity season (April 15 to August 31) or if that's not possible, then immediately after the maternity season while temperatures are still warm (September 1 to October 15). Surveys will not be conducted during the over-wintering season (November 1 to February 15) when bats go into torpor intermittently during this cool period. The surveys would be conducted by a person holding a memorandum of understanding through the California Department of Fish and Wildlife to handle bats. If an active roost is found in one of these structures, it should be humanely excluded by a qualified biologist with a state permit to do so, prior to the removal of structures and outside of the maternity and over-wintering seasons.

Because a maternity colony of bats could also potentially occur in the tile roof of the historic building at 400 Paul Avenue adjacent to the project alignment, any nighttime construction lighting within line of sight to the building will point away from the building or be shielded so lighting is not directed into the tile roof.

***CPUC Data Request Item #4 – Noise***

- a) For the Egbert Switching Station, please provide a description of the material composition for the proposed shunt reactor "shielding walls". Material intended to be used for perimeter screening of the site is described as "expanded metal mesh," will these shielding walls employ solid materials/surfaces?

***PG&E's Response***

- a) In the preliminary design each of the two shunt reactors will have two types of "shielding walls": (1) reinforced concrete between the reactors and to the south against the switchgear building; and, (2) expanded metal mesh to the north and the outside (west side of the western shunt reactor, and east side of the eastern shunt reactor). The reinforced concrete is a solid surface and the expanded metal mesh shown in the preliminary design is a 76 percent solid aluminum surface. The preliminary design for the perimeter fence is currently the expanded metal mesh for three sides of the site (west, north, and east) and a solid perimeter wall to the south. Please see Attachment 3 with example expanded metal mesh specifications and sample images for additional preliminary design detail.

***CPUC Data Request Item #5 – Transportation and Traffic***

- a) Please provide information to support the use of a lower Passenger Car Equivalent (PCE) factor as applied to trucks and heavy haul trucks in the Vehicular Trip Generation Summary table. Typically, PCE factor of 1.5 is utilized for smaller trucks and PCE factor of 2.0-3.0 is utilized for medium to heavy trucks while estimating trip generation of truck traffic.

***PG&E's Response***

- a) The PCE factor of 1.5 is used for a planning-level analysis by transportation planners for heavy haul trips in general terrain, such as in this PEA. This factor is sourced from Exhibit 11-10, PCEs for Heavy Vehicles in General Terrain Segments, in the Highway Capacity Manual 2010 (Transportation Research Board, 2010). The regional and local agencies in the project area do not specify a local PCE factor to be used. The Highway Capacity Manual is a reasonable source regularly used by transportation planners when

conducting a planning-level analysis where no local PCE factor is identified by the regional and/or local agencies.

We trust the information provided herein is fully responsive to your requests. However, should you have any further requests, please do not hesitate to contact me at (415) 973-0301.

Sincerely,



Bob Donovan  
Senior Land Planner

Enclosure(s):  
Attachments 1 -3

cc:  
Wendy Worthey, Dudek  
Mathew Swain, PG&E Law Department  
Colleen Taylor, Jacobs