

Pacific Gas and Electric

South of Palermo 115 kV Power Line Reinforcement Project

Response to Data Request No.2

Below are responses to Data Request No.2 submitted by the California Public Utilities Commission (“CPUC”) dated August 25, 2016, regarding the Proponent’s Environmental Assessment (“PEA”) prepared for the South of Palermo 115 kV Power Line Reinforcement (the “project”). Each CPUC data request is organized by PEA Chapter, set forth in italics and followed by PG&E’s response.

3.0 Environmental Impact Assessment Summary

3.8 Hazards and Hazardous Materials

- a. *Please provide information related to local fire safe regulations, as noted in the response to data request 3.8(b).*

PG&E Response: As stated in the initial response to data request 3.8(b), “PG&E is researching whether there are fire prevention provisions in the Sutter, Butte and Yuba County general plans; such provisions would not be applicable to the project but could provide information to support the CEQA analysis.” The results of this research are as follows:

Sutter County: Chapter 8, Public Services, of the Sutter County General Plan addresses wildland fire hazards. No goals or policies are relevant to the South of Palermo project.

Butte County: Section IV of the Butte County General Plan Health and Safety Element addresses the potential for wildland fires affecting urban and rural interface areas, particularly in higher elevation and forested areas. The project is located outside of the high risk areas identified in the General Plan. Policy HS-P11.1 states: “Fire hazards shall be considered in all land use and zoning decisions, environmental review, subdivisions review and the provision of public services.”

Yuba County: Fire Risk is addressed in the Public Health and Safety Element of the Yuba County General Plan. It notes that fire risk is greatest in the foothill and mountain regions of the county. The proposed South of Palermo project is not located in these high risk areas. Policy HS2.9 states: “Communication and electricity infrastructure in areas prone to wildfire should be located and designed to avoid interruptions during periods of fire activity.”

- b. *The original data request stated: “The PEA (page 3.8-19) states that “Fire prevention actions will be taken during construction to reduce the wildland fire risk, especially in the moderate and high fire-hazard severity zones.” Provide specific details of the fire prevention actions, how and when they will be implemented, relationship to proposed construction equipment, potential ignition sources (vehicles, equipment, line break), required plans and permits, and a discussion of responsible parties and those with enforcement responsibility. Additionally, clarify whether fire prevention actions are proposed in all project areas, or only in SRA.” The response identified only a portion of proposed fire prevention actions and did not address how/when they will be implemented, their relationship to proposed construction equipment, potential ignition sources, required plans and permits, identification of responsible parties and those with enforcement responsibility and whether fire prevention actions are proposed in all project areas, or only in SRA. More detailed information is needed to evaluate potential impacts.*

PG&E Response: The operation of vehicles and equipment in grassy areas during construction poses a risk for igniting vegetation present at work sites. Line breaks during construction would not pose a risk as the line clearances will be in effect when moving or replacing conductor. PG&E's fire danger precautions are applicable during all construction activities in any hazardous fire area, regardless of SRA designation, as described further below.

In addition to the measures identified in APM HAZ-3, which would apply specifically in SRAs, PG&E has established a utility standard to implement fire danger precautions in any hazardous fire area, including SRAs. The PG&E standard specifies the following requirements when working, traveling, or operating in hazardous fire areas and SRAs during the designated fire season in the state of California.

- Personnel must observe all laws, rules, and regulations of fire agencies having jurisdiction over areas in which they are working.
- Any person in charge of personnel working along the project alignment, for example a foreman or a construction compliance manager, must be aware of change in local meteorological conditions and the applicable fire adjective rating for the area, and be aware of the possibility of increased fire danger during the time work is in progress.
- All PG&E construction crews and equipment in hazardous fire areas must be equipped with appropriate firefighting equipment which may include, water dispensers, fire extinguishers, shovels, axes, and back pumps.
- When the fire adjective rating is "Very High" or "Extreme," the following prohibitions apply:
 - No open burning is permitted.
 - All fires must be extinguished.
 - Welding is allowing only in an enclosed building or within an area cleared of all flammable material for a radius of 35 feet.
 - No blasting
 - No smoking in grassland and wildland areas.
 - No vehicular traffic off cleared routes except in case of emergency.

The above fire prevention measures are not tied to a particular type of equipment and would apply consistently during project construction in any hazardous fire area. The person in charge of the work site would be responsible for ensuring proper implementation of these measures.

c. Information related to mitigating O&M fire risk relies on information identified for the project's construction phase, which is incomplete (see previous response).

PG&E Response: Changes to O&M practices are not proposed as a component of the South of Palermo project. As such, baseline O&M practices need not be assessed or mitigated under CEQA. For information purposes, PG&E's power lines are typically inspected annually, alternating between aerial and ground inspections. The power line inspections will be performed on poles, anchors, and right-of-way conditions. This inspection will also check conductors and fixtures for corrosion, breaks, broken insulators, and bad splices. Repairs as a result of inspections or incidences will continue to be undertaken using Best Management Practices and in accordance with any applicable laws. Tree trimming will continue to be conducted in accordance with the CPUC's General Order 95. The fire prevention measures identified above would apply during O&M activities as well.

d. Please provide the estimated quantities of fuels to be stored during construction in each construction yard and the approximate duration of use of each construction yard.

PG&E Response: There are no construction yards being created as part of this project. Storage of fuels at project staging areas, pull sites, and landing zones is not anticipated.

e. Are the existing steel poles painted? If so, has lead-based paint testing been conducted?

PG&E Response: Some of the existing structures along the alignment may have been painted. PG&E has not yet conducted lead-based paint testing on the existing structures within the project alignment. PG&E will conduct a pre-construction inspection to identify painted towers and collect representative samples for analysis to determine whether the paint contains lead. Any construction work in which an employee may be occupationally exposed to lead would be conducted in accordance with the Cal/OSHA Lead in Construction Standard (California Code of Regulations, Title 8, Section 1532.1). Any removed structures or parts will be disposed of in accordance with applicable law.