

<b>CENTRAL VALLEY NATURAL GAS STORAGE PROJECT</b>	<b>VARIANCE REQUEST FORM</b>	
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<b>Date Required:</b>	August 15, 2011	<b>Variance Request No.:</b>	No. 6 – PG&E Power Poles for Meter Station
<b>Date Submitted:</b>	July 28, 2011	<b>Location:</b>	Five poles will be installed immediately adjacent to the access road to the meter station site (four on the south and one on the north side of Dirks Road) (Figure 1). An existing power pole will be relocated from the pipeline right-of-way on the west side of Noel-Evans Road and south side of Dirks Road to a site on the north side of Dirks Road (Figure 2).
<b>Property Owner(s):</b>	Holthouse Dirks	<b>Parcel No.:</b>	011-040-026 (Holthouse) 011-040-011 (Dirks)
<b>Current Land Use:</b>	Road shoulder and non-native annual grassland	<b>Sensitive Resources:</b>	The work area contains suitable habitat for western burrowing owls

**Variance from:** This variance requests the CPUC’s approval to 1) install four (4) new poles to provide power to the meter station and 2) removal of one existing pole within the pipeline construction ROW and installation of one pole out of the pipeline ROW. The poles would allow connection to an existing PG&E 12kV above-ground power line that runs along the northern edge of Dirks Road.

The attached diagram shows the proposed location of the four (4) new poles that would be installed to provide electricity to the meter station. The locations of five new poles that will be installed and one existing pole that will be removed are shown on Figures 1 and 2 and Sheet 10 of the biological study area maps (July 2011).

**Description and Justification for Variance:** The Dirks Road 12-kV line allows better utilization of existing overhead lines thus reducing the quantity of new cable, pole additions, and associated work zones. The wooden poles will be 45-foot-tall and will be the same height as other poles in the area. The poles will blend into the character of the area and no aesthetic impacts are anticipated. The four poles will be installed using an auger to dig an approximately 18-inch wide, 4- to 6-foot deep hole. After the pole is installed, the hole will be backfilled with soil and aggregate base material. The electrical wire will then be strung along the top of the poles. The total disturbance area required to install the poles is a 5-foot by 5-foot area.

The installation of the four (4) poles along the south and north side of Dirks Road would require approximately four (4) days and is scheduled to start during the week of September 12, 2011. The removal of the existing pole on the south side of Dirks Road (west side of Delevan Road [also known as Noel-Evans Road]) and installation of the new pole on the north side of Dirks Road (also on the west side of Delevan Road) would require approximately three (3) days and is scheduled to start during the week of September 12, 2011.

**Environmental Analysis.** A brief description of the potential environmental effects associated with the project activities being proposed as part of this variance request is provided below.

**Aesthetics.** The new poles will be the same height as the other PG&E poles in the area. Installation of the power poles would not result in any new or greater aesthetic impacts than were previously described in the MND. The poles will blend into the existing character of the area and no impacts on aesthetics or visual resources are anticipated. No mitigation is required.

**Agricultural and Forestry Resources.** The poles will be installed in areas that are not currently in agricultural production and will not be used in the future for agricultural production. No forestry resources occur in the project area. No impacts on agricultural or forestry resources are anticipated. However, CVGS will implement APM AGRI-1 and AG-1 prior to installing the new poles. No new mitigation has been identified.

**Air Quality and GHG Emissions.** Installation of the power poles would not result in any new or greater impacts than were previously described in the MND. CVGS will implement the appropriate APMs and mitigation measures identified in the MND to avoid and minimize potential short-term construction-related air quality impacts associated with installation of the new poles and removal of the one existing pole. No new mitigation has been identified. CVGS will implement APMs AIR-1, AIR-2, and AIR-3 as part of the proposed pole installation and removal activities.

**Biological Resources.** The poles will be installed in a non-native annual grassland that provides potential habitat for burrowing owls. A biological survey was conducted on June 28, 2011 and confirmed that no sensitive biological resources occur within the proposed work area. The results of the biological survey were contained in a technical memorandum submitted to the CPUC to support issuance of NTP 10B for pipeline ROW preparation. Additional preconstruction surveys will be conducted prior to the installation and removal of the poles. CVGS will implement APMs BIO-1, BIO-3, BIO-7, BIO-8, BIO-10, and BIO-14 as part of the proposed pole installation and removal activities. No new mitigation has been identified.

**Cultural Resources.** The poles are located within the cultural resources survey area (conducted for the PEA and Section 106 report). No cultural resources were found during previous surveys and therefore, no cultural resource monitoring is required. CVGS will implement APMs CR-3 and CR-4 and mitigation measure CUL-1 as part of the proposed pole installation and removal activities. No new mitigation has been identified.

**Geology and Soils.** The installation of the new poles and removal of the one existing pole will not result in any effects related to geologic, soil, and seismic site conditions. The poles installation and removal activities would not result in any new or greater impacts than were discussed in the MND. No mitigation is required.

**Hazards and Hazardous Materials.** The only hazardous materials that will be used during installation of the poles are gasoline, diesel fuel and lubricants used by construction equipment. CVGS will implement the appropriate APMs and mitigation measures identified in the MND to avoid and minimize potential impacts associated with installation of the new poles and removal of the one existing pole. These measures include APMs HAZ-1 and HAZ-2 and mitigation measure HAZ-3. No new mitigation has been identified.

**Hydrology and Water Quality.** No drainages or other surface water features will be impacted during installation or removal of the power poles. There is a low potential for groundwater to be encountered during excavation of the hole and therefore, no dewatering of the hole is anticipated. Appropriate measures outlined in the project SWPPP and APM HYDRO-1 will be implemented during pole installation and removal activities. No new mitigation has been identified.

**Land Use and Planning.** No potentially significant impacts related to land use have been identified. No mitigation is required.

**Mineral Resources.** Installation of the power poles and removal of the one power pole would not have a significant effect on mineral and energy resources and would not result in the loss of the availability of the resources because none occur in the project area. No mitigation is required.

**Noise.** CVGS will implement the appropriate APMs and mitigation measures identified in the MND (APM NOI-1 and mitigation measure NOI-1) to avoid and minimize potential short-term construction-related noise impacts associated with installation of the new poles and removal of the one existing pole. No new mitigation has been identified.

**Population and Housing.** Installation of the power poles would not result in any new or greater impacts than were previously described in the MND. No mitigation is required.



**Public Services.** The poles installation and removal activities would not result in any new or greater impacts on public services than were discussed in the MND. No mitigation is required.

**Recreation.** The poles installation and removal activities will not increase the use of public recreation facilities and will not require the expansion of recreation facilities. In addition, the proposed work would not result in any new or greater impacts on recreation activities than were discussed in the MND. No new mitigation has been identified.

**Transportation/Traffic.** Dirks Road will be used to access the work areas. This road will remain open during the work period and no road closure is proposed. The proposed work would not result in any new or greater impacts on transportation than were discussed in the MND. No mitigation is required.

**Utilities and Service Systems.** The pole installation and removal activities would not require an expansion or improvement in utilities or service systems, including wastewater and water supply treatment or delivery. In addition, the proposed work would not result in any new or greater impacts on recreation activities than were discussed in the MND. No new mitigation has been identified.

**Site Conditions/Comments:** The pole installation and removal activities will occur in disturbed annual grasslands.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Mgr				
Central Valley Construction Manager	7/28/2011	Dirk de Bruyn		
Central Valley Environmental Manager	7/28/11	Susan Bushnell Bergfalk		None

**Prepared by:** Susan Bushnell Bergfalk, Environmental Manager, ICF International      **Date:** July 28, 2011