

**CENTRAL VALLEY
NATURAL GAS
STORAGE
PROJECT**

**VARIANCE
REQUEST
FORM**



Date Required:	August 22, 2011	Variance Request No.:	No. 8 – Five (5) Equipment and Material Staging Areas
Date Submitted:	August 15, 2011	Location:	The five temporary staging areas are numbered on the biological resources map set and include the following: 1) 1.5 acres on Glasgow airstrip on west side of McAusland Road (Sheet 1). 2) 0.2 acre on unpaved agricultural road. Located south of D-6a and adjacent to pipeline ROW (Sheet 2). 3) 0.34 acre on unvegetated site. Located on the west side of 2 Mile Road and adjacent to pipeline ROW (Sheet 6). 4) 1.5 acres on existing agricultural facility on north side of Norman Road (Sheet 11). 5) 2.5 acres on existing agricultural facility on west side of Old Highway 99 (Sheet 12).
Property Owner(s):	1) Glasgow 2) Colusa Farms 3) Teeter 4) Glasgow 5) Brian	Parcel No.:	1) Glasgow (012-110-096) 2) Colusa Farms (012-110-103) 3) Teeter (011-280-064) 4) Glasgow (012-110-095) 5) Brian (011-220-064)
Current Land Use:	1) Unpaved runway for crop dusters. 2) Unpaved agricultural road. 3) Unpaved agricultural staging area. 4) Existing agricultural equipment storage yard. 5) Existing agricultural equipment storage yard.	Sensitive Resources:	All of the five sites are graded and disturbed areas used for agricultural purposes. There are no sensitive resources on the sites. However, there are sensitive habitats for nesting raptors, giant garter snake, and valley elderberry longhorn beetle located within 200 feet of the sites (see discussion below under <i>Environmental Analysis – Biological Resources</i>).

Variance from: This variance requests the CPUC’s approval to use five (5) sites adjacent to the construction work area for temporary staging of equipment and materials. These five sites were not described in the PEA and were not included in the IS/MND impact analysis.

Description and Justification for Variance: CVGS' contractors have identified the need for additional staging areas for the temporary storage of construction materials and equipment. The five sites that are being requested for approval occur immediately adjacent or near the construction work area. All sites are graded and disturbed and are currently being used for agricultural purposes. The sites will be used for the temporary parking of construction equipment and material storage (e.g., pipe material, mats, skids, pumps, and environmental supplies).

Environmental Analysis: A brief description of the potential environmental effects associated with the use of the staging areas is provided below.

Aesthetics. The staging areas are currently being used for agricultural purposes. The temporary staging of equipment and materials at the five sites will not affect 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 five staging areas are not 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 use of the staging areas. No new mitigation has been identified.

Air Quality and GHG Emissions. Use of the staging areas 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 use of the staging areas. No new mitigation has been identified. CVGS will implement APMs AIR-1, AIR-2, and AIR-3, when appropriate.

Biological Resources. An ICF biologist walked each of the proposed five staging area sites and surrounding areas on July 12, 14, and 15, 2011. As stated previously, the five staging areas are disturbed and graded sites that do not support sensitive biological resources. However, sensitive habitats occur near each of the sites. Trees along Old Highway 99 (near Site #5) provide suitable nesting habitat for nesting raptors. However, no nesting raptors were observed during the field surveys. Aquatic habitat (drainages and rice fields) occurs within 200 feet of Sites #2, #3, and #4. Aquatic habitat will be avoided and if determined necessary (on a site by site case by the monitoring biologist) fenced or staked and flagged to ensure full avoidance. One elderberry shrub occurs along an existing agricultural road adjacent to Site #2 (see Sheet 2 of map set). This shrub has been fenced and will be full avoided during use of the adjacent staging area. Additional preconstruction surveys will be conducted prior to the use of each individual staging area and the appropriate biological resource APMs will be implemented. No new mitigation has been identified.

Cultural Resources. No subsurface excavation or ground-disturbing activities are proposed for the five staging areas. No impacts on cultural resources are anticipated and no mitigation has been identified.

Geology and Soils. The use of the staging areas will not result in any effects related to geologic, soil, and seismic site conditions. No mitigation is required.

Hazards and Hazardous Materials. No hazardous materials will be stored or used at the staging areas. However, CVGS will implement the appropriate APMs and mitigation measures identified in the MND to avoid and minimize potential impacts, including 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 directly impacted during use of the staging areas. However, the project SWPPP is currently being revised to include the five staging areas. Appropriate measures outlined in the project SWPPP and APM HYDRO-1 will be implemented during use of the staging areas. 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. Use of the staging areas 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 the use of the staging areas. No new mitigation has been identified.

Population and Housing. Use of the staging areas would not result in any new or greater impacts than were previously described in the MND. No mitigation is required.



Public Services. Use of the staging areas would not result in any new or greater impacts on public services than were discussed in the MND. No mitigation is required.

Recreation. Use of the staging areas will not increase the use of public recreation facilities and will not require the expansion of recreation facilities. In addition, the proposed use of the staging areas 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. The use of the staging areas will not affect local traffic. Roads to and from the staging areas will remain open during the work period and no road closure is proposed. The proposed use of the staging areas 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 use of the staging areas would not require an expansion or improvement in utilities or service systems, including wastewater and water supply treatment or delivery. In addition, the use of the staging areas 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 proposed staging areas occur in disturbed areas that are currently being used for agricultural purposes.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Mgr				
Central Valley Construction Manager	8/12/11	Dirk de Bruyn		
Central Valley Environmental Manager	8/12/11	Susan Bushnell Bergfalk		None

Prepared by: Susan Bushnell Bergfalk, Environmental Manager, ICF International **Date:** August 12, 2011