

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 12, 2011

Mr. Mark Cassady
TRC, Inc.
Senior Biologist
80 Stone Pine Rd # 200
Half Moon Bay, CA 94019

Subject: Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project Variance Request #4 for Modifications to Access Roads

Dear Mr. Cassady:

We have reviewed Variance Request #4, which Pacific Gas and Electric Company (PG&E) submitted on September 6, 2011 for the Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project (Project) and have determined that the modified pole access roads will not have significant new or greater environmental impacts than analyzed in the approved Initial Study/Mitigated Negative Declaration (IS/MND) for the project, pursuant to the description and analysis presented in this letter.

Proposed Actions

PG&E is requesting new access roads to facilitate access to work spaces that were not previously identified during initial project scoping. The new roads include (Attachment 1):

- An existing access road between Pole 66/15 and Pole 66/14a
- An existing dirt road between Tower 71/0 and Tower 71/1
- A new overland route to Tower 73/3. Roads are shown in the maps appended to the Variance Request #4 submittal

The roads were not previously identified in the IS/MND and will require minor improvements prior to use. PG&E has clarified that mowing along two of the roads, the existing dirt road to Tower 71/0 and new overland route to Tower 73/3, is for fire safety and does not warrant their classification as "Reestablished Access Road" per the categories used in Figure 2.4 of the IS/MND. The road to Tower 71/0 would also require flattening out of a spoil pile within a Caltrans spoil storage area along the road to gain access to the 100-foot work area near the tower. As a condition of approval for this variance, PG&E will coordinate with Caltrans prior to implementing improvements along the road to Tower 71/0 and obtain permission as needed to disturb the spoils pile.

CPUC Analysis of Environmental Impacts

Biological and Cultural Resources. Although the access roads proposed here were not included in the initial IS/MND, these roads were reviewed for botanical, wildlife, and cultural resources as part of the original project field work. The roads fall within the transmission line alignment that

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was surveyed. Pre-construction biological surveys will be performed before grading begins on any road area and project APM and mitigation measures defined in the IS/MND will be implemented as appropriate to the area and the activity. Proposed activities include those described for use of access roads, which were addressed in the approved IS/MND. Where sensitive plants have been identified, appropriate monitoring, avoidance, and seed collection will be performed in accordance with requirements of the MND and the Revegetation and Monitoring Plan.

No additional new or greater impacts are anticipated provided all mitigation measures and APMs are implemented.

Air Quality. The project as proposed resulted in significant fugitive dust emissions that exceeded the standards of the APCD; however, the IS/MND includes mitigation measure AQ-1, which, if implemented, reduces impacts from fugitive dust to less than significant levels. Thus, any potential increases in fugitive dust emissions that would result from use of the new paved and unpaved roads, from mowing, and from soil disturbance along the road to Tower 71/0, would be reduced to less than significant levels with adherence to the dust control measures in mitigation measure AQ-1, and no new or greater impacts than were addressed in the IS/MND are anticipated.

Noise and Traffic. Noise and traffic impacts would be similar to the impacts assessed in the IS/MND and would not have new or greater impacts.

Hazards and Hydrology. Hazards and hydrology impacts would be the same as assessed in the approved IS/MND. Measures to contain spills and minimize hazards, including fire hazards, and to prevent sedimentation or runoff would be implemented as required in the approved IS/MND. No new or greater impacts associated with hazards or hydrology would occur.

Approval

The modifications to pole access roads will not have significantly greater or new significant impacts beyond those identified in the IS/MND prepared for the Project. Provided PG&E coordinates with Caltrans prior to disturbing the spoils pile along the road to Tower 7/10 and implements all mitigation measures pertinent to the Project, Variance Request #4 is approved. Please contact me or Andrew Martin of RMT if you have any questions.

Sincerely,

MJ Orsaba

Lisa Orsaba

CPUC Project Manager

Cc: Andrew Martin, RMT, Inc.
Tania Treis, RMT, Inc.
Jo Lynn Lambert, PG&E attorney

Attachment 1: Variance #4 Request Submittal