

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 13, 2012

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 #8 for an additional laydown area adjacent to the Atascadero Substation

Dear Mr. Cassady:

I have reviewed Variance Request #8, Revision 2, which Pacific Gas and Electric Company (PG&E) submitted on February 9, 2012 (initially submitted December 21, 2011, with revisions submitted on January 17 and February 9, 2012) for the Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project (Project). The CPUC has determined that the proposed laydown area would not have new significant impacts or greater environmental impacts than those analyzed in the approved Initial Study/Mitigated Negative Declaration (IS/MND) for the project, pursuant to the description, analysis, and conditions presented in this letter.

Proposed Actions

PG&E is requesting an additional laydown area within a developed residential area adjacent to the Atascadero Substation, as shown in Attachment A (PG&E's Variance Request #8, Revision 2 submitted on 2/9/12 and map details included in the initial submission and Revision 1). The proposed staging area is located off the southeast corner of the Atascadero substation, which was previously approved as a pull and tension site. The laydown area would include approximately 12,200 square feet of space for temporary storage of poles and associated hardware. Vehicles or construction equipment would access the site temporarily to store and frame light duty steel poles for residential installation in Atascadero. Vehicles and construction equipment would not be stored in the laydown area. The area is covered with decomposed granite.

The requested actions are necessary for PG&E work crews due to insufficient work and laydown space for new poles within pole work areas in Atascadero. Pole work areas located in the residential portion of Atascadero along Santa Rosa Road are in close proximity to a variety of obstructions including roads, sidewalks, driveways, fences, drains, ditches, and resident property and are therefore limited in size. The additional laydown area would also allow PG&E work crews to reduce approved power outages for pole work by minimizing the transport time for the poles and hardware from the laydown area to the site of installation.

CPUC Analysis of Environmental Impacts

Biological Resources. Biological resource impacts would not increase from the implementation of the proposed laydown area. The proposed laydown area is within a previously disturbed and

developed area on packed decomposed granite. The area was surveyed for biological resources during the initial surveys for the project. No disturbance to vegetation or animal habitat would occur and no new or greater impacts to biological resources than those approved in the IS/MND would occur.

Raptors and nesting birds. Raptors and nesting birds could occur in the vicinity of the proposed laydown area. Impacts would be the same as those addressed in the IS/MND. Measures pertaining to the protection of any sensitive species and habitats must be implemented (i.e., surveys and avoidance during the nesting season).

With implementation of all pertinent mitigation measures and APMs in the IS/MND, no additional new or greater impacts to biological resources are anticipated.

Cultural Resources. Applied Earthworks (Æ) conducted the original archaeological and historical resources surveys for the 15.5 mile project route in November and December 2008, including the entire proposed laydown area. No resources were found in the proposed laydown area identified in this variance. No additional new or greater impacts to cultural resources, including any resulting from discovery of any previously unknown resources during construction, are anticipated provided all mitigation measures and APMs are implemented.

Air Quality. The San Luis Obispo County Air Pollution Control District (SLOAPCD) was consulted by PG&E regarding requirements listed under Mitigation Measure AQ-1 and AQ-3 of the IS/MND. SLOAPCD reviewed and approved PG&E's laydown area and framing activities at the proposed site in an email sent February 9, 2012, as shown in Attachment B (email between Andy Mutziger, SLOAPCD, and Mark Cassady, TRC). SLOAPCD approved the proposed actions under the assumption that 6 poles would be stored in the laydown area at a time and idling would not be greater than if poles were stored and framed at individual pole work locations. Therefore, no new or greater impacts to air quality would occur from the proposed activity.

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. All relevant mitigation from the IS/MND must be implemented. PG&E has identified an ingress/egress point at the north end of the proposed laydown area at Santa Rosa Road. Vehicles entering and exiting the laydown area would have fewer impacts to traffic flow and to the public from traffic hazards than laying down and framing single poles in residential pole work areas where space is limited.

Hydrology. Hydrology impacts would be the same as assessed in the approved IS/MND. The proposed laydown area would not change any surface flow patterns and there are no surface drainage features in proximity to the site. Measures to contain spills and to prevent sedimentation or runoff would be implemented as required in the approved IS/MND.

Hazards. The IS/MND addressed the hazards associated with project laydown and storage near residential areas. The proposed activity would not present new or greater impacts than those addressed in the IS/MND. Measures to minimize hazards would be implemented as required in the approved IS/MND. PG&E has stated that poles and hardware would be left in the proposed laydown area until approved power outages allowed for pole replacement. Due to the proximity to residential homes and churches and the potential for the public to access the laydown area and

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potentially be injured or to vandalize the area, CPUC strongly suggests that PG&E fence the laydown area with fencing of sufficient height to separate it from public access.

Approval

The addition of the proposed laydown area 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 the appropriate parties as necessary and implements all mitigation measures pertinent to the project and activities as identified in the Final IS/MND and this letter, Variance Request #8 is approved. Please contact me or Aaron Lui of Panorama Environmental if you have any questions.

Sincerely,

MJ Orsaba

Lisa Orsaba

CPUC Project Manager

Cc: Aaron Lui, Panorama Environmental, Inc.
Tania Treis, Panorama Environmental, Inc.
Judi Mosely, PG&E attorney

Attachment A: Variance #8, Revision 2 Request Submittal including map details from initial submission and Revision 1

Attachment B: Email approval from the San Luis Obispo Air Pollution Control District

Environmental Variance Request Form

Atascadero - San Luis Obispo 70kV Power Line Reconducting Project

Date: December 20, 2011 Date by which Approval is Required: January 2, 2012

Location: Atascadero Substation, Santa Rosa Road Current Land Use: Public Facilities

Ownership: Private Yes, PG&E County Road: No Other: Atascadero city limits

Drawing/Plan No.: 1 of 21 Drawing/Sketch Attached? Yes see attached No

Variance Summary Description: PG&E has identified the area adjacent to the Atascadero Substation for use as a laydown area.

Describe variance in detail: The area to the south of the Atascadero Substation is composed of decomposed granite and gravel. It is approximately 12,200 square feet and is owned by PG&E. The PG&E wood pole crew has identified the existing gravel and DG area for laydown of poles and associated hardware. Most of the area has been previously approved for use as a pull and tension site (see attached detail map). The laydown area would be utilized to temporarily stage poles along with associated hardware. Poles and hardware currently stored at the Templeton yard will be periodically delivered to the site by truck. Hardware will be framed on the poles and will be transported from the laydown area to specific pole locations after holes are excavated. After replacement pole locations within the City limits have been prepared and a line outage clearance has been authorized, the framed poles will be removed from the laydown area and installed. Framing would be completed with power and hand tools and would be performed no differently than if it were being done at the individual pole sites, but would minimize the disturbance around each of those pole sites. Use of the laydown area would reduce the number of round trips required to obtain poles from the Templeton yard.

Reason for the variance: At several pole relocation sites within City limits there is insufficient work space available to lay and assemble new poles prior to being set in place. As such, this variance would provide an easily accessible area for the wood pole crew to temporarily stage and assemble poles while they are working in the Atascadero area. Furthermore, installation of poles must be conducted within a fairly short window that is allowed for outages within the City. This variance will increase efficiency by reducing travel time to allow the crew to maximize the number of pole installations during any single outage.

CEQA Guidelines 15162 review: The proposed variance does not involve substantial changes to the project or project circumstances that will require major revisions to the mitigated negative declaration. Instead of poles being staged individually at each pole location within the Atascadero City limits, poles would be stored adjacent to the existing Atascadero Substation.

Whereas framing of the poles at this laydown area would be within 1,000 feet of residential units, the same framing activity would otherwise still be required at the individual pole sites which are all within 1,000 feet of residences. Where there is insufficient space to stage poles within the 40-foot limits around each pole, each pole would otherwise need to be brought to the site individually from the Templeton yard and/or additional space would need to be obtained near each pole site, which would increase the area of disturbance. The variance would therefore reduce the number of round trips between Atascadero and Templeton, decreasing overall vehicle emissions, reducing short-term traffic impacts within the City limits, and reducing the area of disturbance around the poles. It will not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts.

----- **This part to be completed by Environmental Monitor** -----

Botanical Survey Required? Yes _____ No

If yes, results of survey: _____ Survey Date: _____

If no, explain why survey not needed: Site is an existing gravel/DG parking area

Survey report attached? Yes _____ No _____ Submitted separately by (date) _____

Wildlife Survey Required? Yes _____ No

If yes, results of survey: _____ Survey Date: _____

If no, explain why survey not needed: Site is an existing gravel/DG parking area

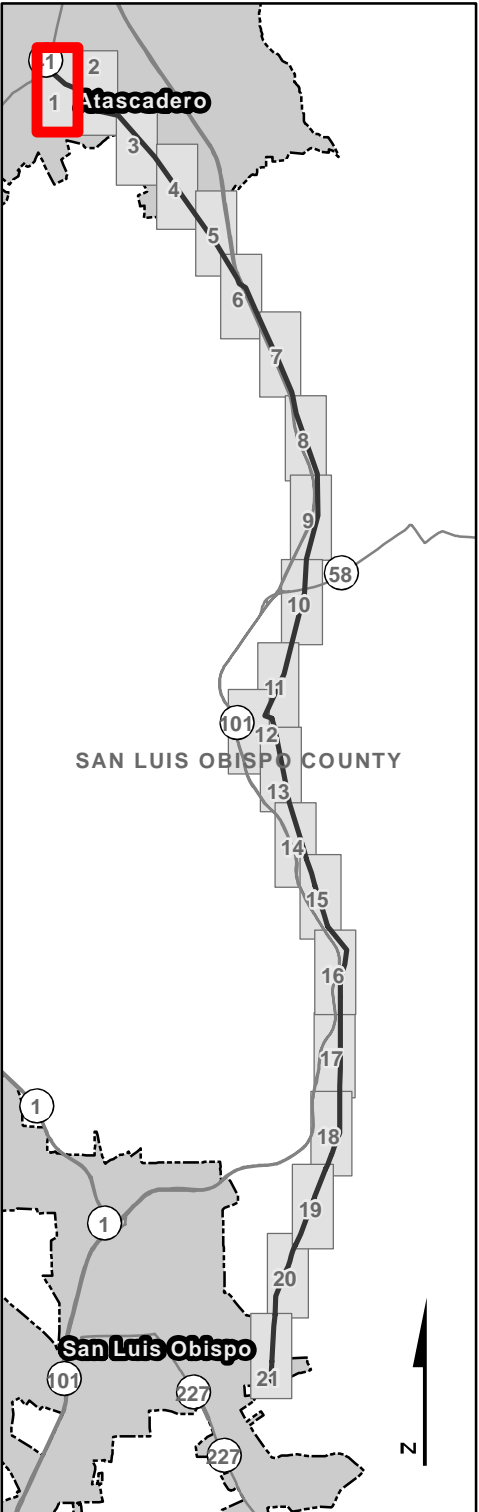
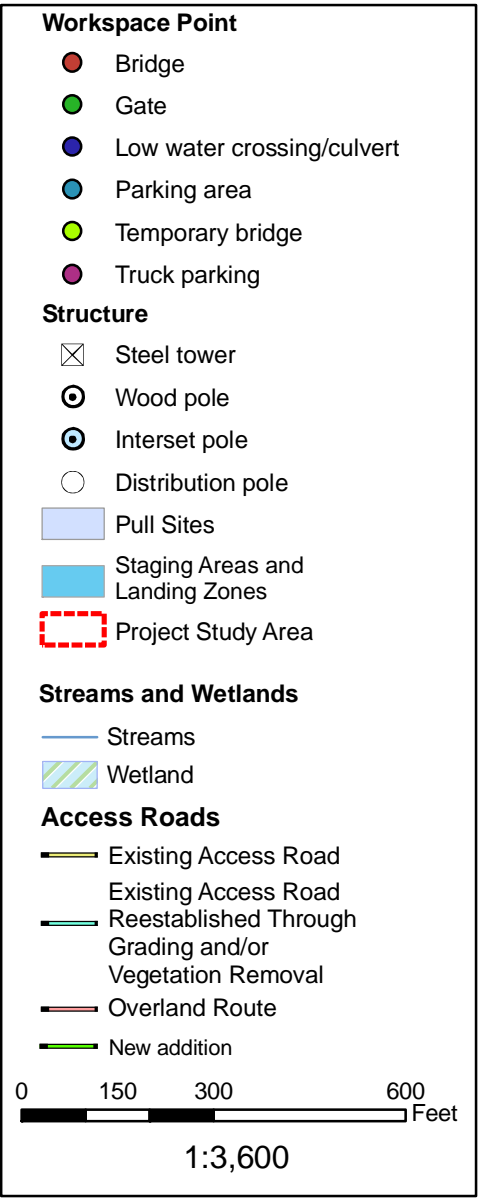
Survey report attached? Yes _____ No _____ Submitted separately by (date) _____

Cultural or Paleontology Resource Survey Required? Yes _____ No

If yes, results of survey: _____ Survey Date: _____

If no, explain why survey not needed: Site is an existing gravel/DG parking area. No ground disturbance is needed.

Survey report attached? Yes _____ No _____ Submitted separately by (date) _____






Detail Map

Atascadero-San Luis Obispo 70 kV Power Line Reconducting Project

Atascadero Substation Extra Work Space



Legend

-  Substation
-  Proposed Work Space (roughly 12,200 sq. feet)
-  Wood Poles

**THIS INFORMATION IS CONFIDENTIAL
DO NOT DISTRIBUTE**

12/14/2011



Aaron Lui

From: Cassady, Mark (Half Moon Bay,CA-US)
Sent: Thursday, February 09, 2012 4:23 PM
To: 'Aaron Lui'
Cc: Salvadori, Robyn; 'Brian Dugas'; Tania Treis
Subject: FW: PG&E Atascadero to SLO - New Temporary Extra Work Space
Attachments: Variance Request #8 Atascadero substation EWS_REVISED_020612.doc

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Hi Aaron:

As we discussed, here is the email from Andy Mutziger with SLOCAPCD stating their opinion regarding use of the laydown area in Atascadero. I met with Andy this morning and provided him with a copy of the attached variance request (the same one that I had sent to you earlier as a draft) and we talked in general terms about how the work would proceed. If possible, we would like approval of this variance request by the end of the day Friday so that the site will be available for use on Monday.

Please feel free to contact me if you would like to discuss anything.

Sincerely,

Mark Cassady
Senior Biologist / CPESC

80 Stone Pine Road, Suite 200, Half Moon Bay, CA 94019
[REDACTED]

-----Original Message-----

From: [amutziger_apcd@\[REDACTED\]](mailto:amutziger_apcd@[REDACTED]) [mailto:[amutziger_apcd@\[REDACTED\]](mailto:amutziger_apcd@[REDACTED])]
Sent: Thursday, February 09, 2012 2:45 PM
To: Cassady, Mark (Half Moon Bay,CA-US)
Cc: [aarlingenet_apcd@\[REDACTED\]](mailto:aarlingenet_apcd@[REDACTED]); Salvadori, Robyn
Subject: RE: PG&E Atascadero to SLO - New Temporary Extra Work Space

Hi Mark,

Thank you for meeting with me this morning, reviewing the proposal in more depth, and answering the questions that we posed on my 31 Jan 2012 email.

You noted that the initial concept was to expand the work area at the pole installation locations themselves beyond the allowed 40' envelope to build the towers, but the variations for each site makes the logistics of this concept difficult.

The concept instead is to deliver 6 poles at a time from the Templeton yard to the proposed Hwy 41 laydown yard (1 truck). PG&E expects that it will take 3 days to frame those 6 poles and ready them for installation at the individual pole locations (1 line truck and 1 work truck for the building and 1 line truck for later delivery). The line truck would run for approximately 4 minutes to lift and lower the pole to be worked on. While the poles are being readied, it is also likely that workers will be at individual pole installation locations, drilling the holes for the poles. (Note: sensitive receptor diesel idling restrictions and fugitive dust control should apply to these locations as well).

For the Hwy 41 lay down yard, you noted that workers are held to complying with mitigation measures AQ#1 & 3 with an anticipation of a maximum of 3 to 4 diesel trucks accessing the site a day with other days where there will be no truck access.

Thank you for helping us understand the scale of the activity. With the relatively small scale of proposed diesel activity coupled with the diesel and fugitive dust mitigation measures in conditions AQ#1 and 3, the APCD is comfortable with PG&E's requested modification to stage and build poles at the area adjacent to the Atascadero Substation on Hwy 41.

Please let me know if you have any questions.

Sincerely,

Andy Mutziger
Air Quality Specialist
San Luis Obispo County Air Pollution Control District


www.slocleanair.org