

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 17, 2020

Mr. David Thomas  
245 Market Street, Room 1054D  
San Francisco, CA 94105

**RE: Minor Project Refinement #19 for the Fulton-Fitch Mountain Reconductoring Project**

Dear Mr. Thomas,

Pursuant to the California Environmental Quality Act (CEQA), the California Public Utilities Commission (CPUC) prepared an Initial Study/Mitigated Negative Declaration (IS/MND) for Pacific Gas and Electric Company's (PG&E's) Fulton-Fitch Mountain Reconductoring Project (A. 15-12-005). On December 18, 2017, the CPUC issued a decision to adopt the Final IS/MND and grant PG&E a Permit to Construct the project (Decision D.17-12-012). Following its initial decision, the CPUC prepared a Supplemental IS/MND to address project changes proposed by PG&E, which was adopted on September 12, 2019.

The CPUC adopted the mitigation measures (MMs) and applicant proposed measures (APMs) identified in the 2017 IS/MND (with revisions identified in the 2019 Supplemental IS/MND) as conditions of project approval, as well as a Mitigation Monitoring and Reporting Program (MMRP) to ensure compliance with the MMs and APMs pursuant to Public Resources Code § 21081.6 and § 15097 of the CEQA Guidelines. A detailed Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) was developed for the project with direct participation from PG&E staff. The MMCRP defines specific procedures that are part of the adopted MMRP, including the Minor Project Refinement (MPR) process, which requires PG&E to obtain CPUC authorization for any deviations from the approved project.

In May 2020, PG&E requested MPR #19 to obtain CPUC authorization to install three 6-inch diameter ground wells 100 feet deep at Fitch Mountain Substation to enhance the substation's grounding system. The CPUC conducted a CEQA consistency review for MPR #19 following the procedures set forth in the MMCRP. A copy of the MPR review form is provided as Attachment 1, which describes the proposed actions and the CPUC's consistency review analysis. This letter serves to inform you that the CPUC has reviewed and approved PG&E's request for MPR #19 on the basis that no new or substantially greater impacts would occur beyond those previously analyzed in the 2017 IS/MND and 2019 Supplemental IS/MND.

Please note, this approval includes one condition. Prior to well installation activities at Fitch Mountain Substation, PG&E shall provide a copy of an executed well permit obtained from Sonoma County. PG&E shall include the name and qualifications of the licensed engineer responsible for implementing the permit conditions and ensuring the wells meet State and local standards.

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Please direct any questions related to this matter to me at 415-703-1966 or [lisa.orsaba@cpuc.ca.gov](mailto:lisa.orsaba@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lisa Orsaba', with a horizontal line extending to the right.

Lisa Orsaba  
Project Manager  
Energy Division, CEQA Unit

cc: Jo Lynn Lambert, PG&E Attorney  
Aaron Lui, Project Manager, Panorama Environmental, Inc.

Attachment 1: CPUC Review of MPR #19

# MINOR PROJECT REFINEMENT REVIEW FORM



## Part A: Request Description

### MPR Request

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<b>Request Number:</b>	19
<b>Date Requested:</b>	May 2020
<b>Proposed Duration/ Timing of Use:</b>	PG&E requests to begin installation of the grounding anodes in late June or early July. The activity would take approximately 5 to 8 days to complete, assuming no adverse subsurface conditions are discovered (e.g. rocks, cobbles, loose gravels).
<b>Location:</b>	Fitch Mountain Substation
<b>Attached Map?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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### Proposed Action(s)

PG&E proposes to install three (3) cathodic protection ground wells at Fitch Mountain Substation. The ground wells would include 100-foot-deep anode bars that have a diameter of 4 inches; each would require a six-inch-diameter hole to be drilled. Three trucks and a crew of 3 personnel would be used to complete the activity. One truck would be mounted with a drill rig with a 35-foot high mast. The three borings would be installed with tremie pipe grouted with Lynconite grout. The holes would be backfilled with bentonite drilling fluid, which would then be replaced with Lynconite backfill piped to the bottom of the boring. Drilling spoils would be temporarily stored in approximately 30, 55-gallon drums located within the substation fence line until the material is analyzed. After the material is analyzed it will be transported to an appropriate disposal site.

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### Purpose(s)

PG&E completed a ground grid analysis of Fitch Mountain Substation in 2017 (Attachment A) which identified areas of touch and step potential hazards within the substation due to high soil resistivity following reconductoring of the Fulton-Hopland 60-kV line. PG&E proposes to install three ground anodes 100 feet deep to mitigate the potential hazards. Installation of the three anode bars would decrease electrical ground resistance at the substation by extending the ground grid to the depth of low resistivity soil, and would mitigate the potential hazards identified in the ground grid analysis. Prior to project construction, two ground wells were installed at the substation in 2003, which are shown on Attachment A. The three new wells would be installed, operated, and maintained in a similar manner as the existing wells.

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## Part B: Existing Conditions

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<b>Existing Land Uses:</b>	Fitch Mountain Substation
<b>Surrounding Land Uses:</b>	Residential properties off of Bailhache Avenue to the east and south. Industrial concrete supply facility (Syar Industries) to the west. Russian River and associated riparian areas to the north.
<b>Sensitive Receptors within 500 feet:</b>	10 to 20 residences are located within 500 feet of the substation to the south and east.
<b>Environmental Recourses within 500 feet:</b>	<ul style="list-style-type: none"><li>• The substation is surrounded by woodland which provides suitable habitat for nesting birds.</li><li>• Riparian woodland is present approximately 50 feet to the north of the substation. The Russian River channel is present approximately 250 feet to the north.</li></ul>
<b>Has landowner approval been granted?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A The proposed activities would occur within the PG&E-owned substation.
<b>Landowner:</b>	PG&E

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## MINOR PROJECT REFINEMENT REVIEW FORM

### Surveys

List any new survey reports under Part D, attach a copy, and describe relevant survey details under the applicable resource category listed in the Part E.

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**Biological Resources. Were all sites associated with the proposed action(s) surveyed for biological resources with the potential to occur in the area? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season to detect resources? If not, describe under the applicable resource category in Part E.**

Fitch Mountain Substation is within the biological survey area identified in the IS/MND. No special-status species were identified in the proposed area, and there is low potential for special-status species to occur within the developed substation footprint. Suitable habitat for nesting birds exists in the wooded riparian and residential areas surrounding the substation. PG&E biologists discovered six active nests in the vicinity of Fitch Mountain Substation and the associated access road since early 2020.

**Cultural Resources. Were all sites associated with the proposed action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?**

Fitch Mountain Substation is within the cultural survey area identified in the IS/MND. Pedestrian surveys were conducted between 2011 and 2017. No cultural resources were discovered at the proposed work site.

**Jurisdictional Waters. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?**

The proposed work area was surveyed for hydrologic resources in 2018. No hydrological resources are present at the proposed work site. The Russian River is located approximately 250 feet to the north of the substation.

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### Part C: Permits, Agency Approvals, and Environmental Protection Measures

List any new permits or agency approvals under Part D, attach a copy, and describe relevant details under the applicable resource category listed in Part E.

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**Have all required permits, permit amendments/authorizations, or agency approvals been issued by resource agencies with applicable jurisdiction? Describe if necessary.**

Yes

**Would the proposed action(s) conflict with permit conditions or agency approvals? Describe if necessary.**

No

**Would the proposed action(s) conflict with project applicant proposed measures or mitigation measures listed in Final Initial Study/Mitigated Negative Declaration (IS/MND)? Describe if necessary.**

No

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### Part D: Attached Materials

List any attached materials (e.g. surveys, maps, photos, memos, agency authorizations, etc.) below. Materials should be attached to the end of this form.

Attachment A: Fitch Mountain Substation Ground Grid Analysis (2017)

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### Part E: Final IS/MND Consistency Summary

Complete the Final IS/MND Consistency Summary below and answer the consistency questions for each resource category. Include a description and justification below each resource category as necessary. The consistency questions were developed using the CEQA Checklist provided in the Final IS/MND. Refer to the Final IS/MND for the details on the project impact evaluation.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact on:	No Change	Potentially Significant Change	N/A
<p><b>Aesthetics (e.g., damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)?</b></p> <p><i>Final IS/MND evaluation: Less than Significant with Mitigation</i></p> <p>Drilling and anode installation activities would involve the use of a 35-foot-high drill rig within the substation. Construction activities would be temporarily and would not contrast significantly with the overall appearance of the substation, which contains many electrical structures and overhead lines. The substation anodes would be primarily subsurface with minor aboveground connections to substation components. The aboveground connections would have a similar appearance to the rest of the substation components. The proposed action would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)?</b></p> <p><i>Final IS/MND evaluation: Less than Significant with Mitigation</i></p> <p>The proposed activities would occur within Fitch Mountain substation, which does not contain any agriculture or forestry resources. The proposed activities would have no effect on agriculture or forestry resources.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Air Quality (e.g. produce additional emissions, or expose sensitive receptors to additional pollutants)?</b></p> <p><i>Final IS/MND evaluation: Less than Significant</i></p> <p>The proposed activities could result in minor levels of fugitive dust. Implementation of APM AIR-1 (fugitive dust emissions) would ensure that impacts from fugitive dust would be minimized and impacts to air quality would remain less than significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on air quality.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Biological Resources (e.g., cause an adverse effect to sensitive or special-status species, or impact riparian, wetland, or any other sensitive habitat, or conflict with local policies or ordinances protecting biological resources)?</b></p> <p><i>Final IS/MND evaluation: Less than Significant with Mitigation</i></p> <p>As described under Part B (Surveys), the proposed access and work area sites are within the biological survey area identified in the IS/MND. The substation footprint is fully developed, and there is low potential for special-status species to occur at the site. The wooded areas surrounding the substation provide suitable habitat for nesting birds, and PG&amp;E biologists have discovered six active nests in these areas since early 2020.</p> <p>An approved PG&amp;E biologist would conduct preconstruction surveys immediately prior to construction activities to detect and avoid any special-status wildlife that may be present at and immediately surrounding the substation site, as specified in APM BIO-7 (California tiger salamander), APM BIO-8 (American badger), APM BIO-9 (western pond turtle), MM BIO-3 (CRLF), MM BIO-4 (foothill yellow-legged frog), and MM BIO-5 (special-status and nesting birds). The proposed actions would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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**Cultural and Tribal Cultural Resources (e.g., cause adverse change to a historical, archeological, or tribal cultural resource)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

As described under Part B (Surveys), the proposed access and work area sites are within the cultural study area identified in the IS/MND. No cultural resources were discovered at the substation site during pre-construction surveys conducted between 2011 and 2017. The proposed activities would involve drilling three 6-inch diameter bore holes for the 4-inch diameter anodes to a depth of 100 feet. Potential impacts on subsurface cultural resources that may be present were analyzed in the IS/MND and found to be less than significant with mitigation. MM Cultural-1 requires archeological monitoring for hole excavation greater than 3 feet in diameter, which would not apply to the proposed drilling activities. Additional excavation associated with the three small diameter borings would not result in a new impact or increase the severity of a previously analyzed impact on cultural or tribal resources. In the unlikely event that a potential cultural resource is detected during drilling, MM Cultural-1 (cultural resource discoveries) would be implemented to ensure impacts would be less than significant.

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**Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities would involve excavation to install the three grounding anodes. The drilling would be facilitated from within the graveled substation footprint. Drilling spoils would be removed from the bore holes and temporarily stored in 55-gallon drums before being off-hauled and disposed of appropriately. No surface excavation would occur. Drilling spoils would be managed appropriately through implementation of BMPs per the project SWPPP. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on geology and soils.

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**Greenhouse Gas Emissions (e.g., generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities would involve the use of a 35-foot-tall drilling rig for approximately 5 to 8 days. The proposed activities would not result in a substantial increase in the level of equipment use and run time of equipment. The estimated greenhouse gas emissions and associated impacts would be consistent with those described in the IS/MND. APM AIR-2 (exhaust emission control measures) would be implemented to ensure that impacts from greenhouse gas emissions would remain less than significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact associated with greenhouse gas emissions.

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**Hazards and Hazardous Materials (e.g., create or increase the exposure of people or structures to hazardous materials or wildland fires, involve the use of additional hazardous materials or equipment, or interfere with an adopted emergency plan)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities would not involve the use of hazardous drilling materials or fluids. After anode installation, the bores would be backfilled with a bentonite clay compound that meets National Sanitation Foundation (NSF) 60 water quality safety standards.

Vehicles and equipment involved with the proposed actions would use hazardous materials (such as fuels and oils) that would be consistent with the types of materials analyzed in the IS/MND. Potential hazards associated with the proposed activities would be addressed through implementation of APM HM-3 (smoking and fire rules), APM HM-4 (carry emergency fire suppression equipment), MM Hazards-1 (hazardous materials procedures and worker training), and MM Hazards-2 (Construction Fire Prevention Plan). Implementation of these measures would ensure that impacts from hazards and hazardous materials are less than significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

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**Hydrology and Water Quality (e.g., degrade water quality, discharge waste or sediment, deplete groundwater, alter the existing drainage pattern, create additional runoff water or polluted runoff, place structures in a 100-year flood hazard area, or expose people or structures to a significant risk involving flooding)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities would involve the installation of three new ground wells at Fitch Mountain Substation. In 2003, two ground wells were installed at the substation. The three new wells would be installed, operated, and maintained in a similar manner as the existing wells.

The Russian River is located approximately 250 feet to the north of the substation. No gravel or other erodible materials would be installed as part of the proposed activity, and drilling spoils would be contained on site within 55-gallon drums. The 100-foot anode drilling depths are expected to reach ground water levels; however, no dewatering or ground water extraction is expected due to the small diameter size of the borings (6 inches). MM Hydrology-1 (SWPPP development and implementation) and MM Hydrology-2 (SWPPP monitoring program) would be implemented to ensure any potential impacts on water features and water quality would be less than significant.

Ground wells, including cathodic protection wells (bore holes with anode bars), pose potential risks to groundwater quality if constructed, maintained, removed, or abandoned inappropriately. Chapter 10 of the California Water Code specifies water quality regulations for water wells and cathodic protection wells, and local governments are mandated with regulatory oversight. Chapter 25b Sonoma's County's municipal code specifies applicable construction standards for water wells (including cathodic protection wells). A licensed and qualified engineer would ensure the cathodic protection wells are installed correctly per regulations. In addition, the well contractor would obtain a ministerial permit from Sonoma County prior to installing the well and the contractor would comply with all applicable State and County standards during well installation and operation. The anodes would be installed following all State and County regulations; therefore, the proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

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**Land Use (e.g., conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities would occur within a PG&E-owned substation and would be consistent with the land use of the site. The proposed activities would have no effect on land use or zoning designations, and would not result in a new impact or increase the severity of a previously analyzed impact on land use and planning.

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**Noise (e.g., expose sensitive receptors to additional noise or vibration)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities could generate up to approximately 82 to 84 decibels at a 50-foot distance. A number of residences are located within 500 feet of the proposed work areas. Daytime noise levels in excess of 84 decibels at Fitch Mountain Substation were addressed in the IS/MND and found to be less than significant with mitigation. Noise from the proposed activities would be temporary and short-term (daytime hours for approximately 5 to 8 days). Implementation of MM Noise-1 (general construction noise) would ensure impacts from construction noise would be less than significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on noise.

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**Paleontological Resources (e.g., cause adverse change to a paleontological resource or site or unique geologic feature)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities would be located in an area of low paleontological sensitivity. In the unlikely event that a potential paleontological resource is discovered during drilling activities, MM Paleontology-2

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(previously undiscovered paleontological resources) would be implemented to ensure impacts would be less than significant. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on paleontological resources.

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**Population and Housing (e.g., induce substantial population growth in an area, or displace substantial numbers of people or housing)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities would not result in population growth or the displacement of people or housing. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on population and housing.

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**Recreation (e.g., increases the use of, or cause adverse effects to, parks or other recreational facilities)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activity is not located adjacent to or within a park or other recreational facility. The proposed refinement would have no impact on recreation.

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**Transportation and Traffic (e.g., increase traffic congestion or degrade performance of the circulation system, taking into account all modes of transportation, or increase hazards due to a design feature)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities would occur on private land and would not occur within public roads. Minor additional vehicle trips would be generated; however, these additional trips would fall within the total estimates described in the IS/MND. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

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**Utilities and Public Services (e.g., result in construction of new, or expansion of existing, water facilities, stormwater drainage facilities, require additional water entitlements, or creation of new solid waste disposal needs)?**

*Final IS/MND evaluation: Less than Significant with Mitigation*

The proposed activities would generate approximately 8.2 cubic yards of drilling spoils, which after testing would be transported either to an area service center for recycling, or to the Sonoma Central Disposal Site for disposal. Approximately 100 cubic yards of solid construction waste was originally described in the IS/MND, and the 9.4 million-cubic-yard capacity of Sonoma Central Disposal Site far exceeds the comparatively small volume of potential additional solid waste generated by the proposed activities. The proposed activities would not include the construction or expansion of water or stormwater drainage facilities, or require additional water entitlements. The proposed activities would not result in a new impact or increase the severity of a previously analyzed impact on utilities and public services.

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