

California Public Utilities Commission
**Fulton-Fitch Mountain
Reconductoring Project**
**Addendum to the Final Initial Study/
Mitigated Negative Declaration**
State Clearinghouse No. 2017072049

DECEMBER 2018

Prepared for:

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Prepared by:

Panorama Environmental, Inc.
717 Market Street, Suite 650
San Francisco, CA 94103
650-373-1200
laurie.hietter@panoramaenv.com

TABLE OF CONTENTS

TABLE OF CONTENTS

1	Introduction.....	1-1
	1.1 Background.....	1-1
	1.2 CEQA Compliance	1-4
2	Description of Proposed Modification	2-1
	2.1 Overview.....	2-1
	2.2 Project Components.....	2-1
	2.3 Construction	2-1
	2.4 Operation and Maintenance.....	2-2
	2.5 Permits and Approvals.....	2-2
3	Environmental Analysis	3-1
	3.1 Aesthetics.....	3-1
	3.2 Agriculture and Forestry Resources	3-1
	3.3 Air Quality	3-1
	3.4 Biological Resources	3-1
	3.5 Cultural and Tribal Cultural Resources	3-3
	3.6 Geology, Soils, and Mineral Resources	3-4
	3.7 Greenhouse Gas Emissions	3-4
	3.8 Hazards and Hazardous Materials	3-4
	3.9 Hydrology and Water Quality.....	3-4
	3.10 Land Use and Planning.....	3-5
	3.11 Noise	3-5
	3.12 Paleontological Resources	3-5
	3.13 Population and Housing	3-6
	3.14 Recreation	3-6
	3.15 Transportation and Traffic	3-6
	3.16 Utilities and Public Services	3-6
	3.17 Mandatory Findings of Significance	3-6
4	Conclusion	4-1
5	References	5-1

TABLE OF CONTENTS

List of Appendices

Appendix A Second Supplemental Proponent's Environmental Assessment

List of Tables

None

List of Figures

Figure 1-1	Project Alignment and Access Road Location.....	1-2
Figure 1-2	Previously Approved and Proposed Access Roads	1-3

1 INTRODUCTION

1.1 BACKGROUND

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 (Application A. 15-12-005). On December 18, 2017, the CPUC issued a decision to adopt the Final IS/MND (2017 Final IS/MND) and grant PG&E a Permit to Construct the project (Decision D.17-12-012). Figure 1-1 shows the Fulton-Fitch Mountain Project alignment.

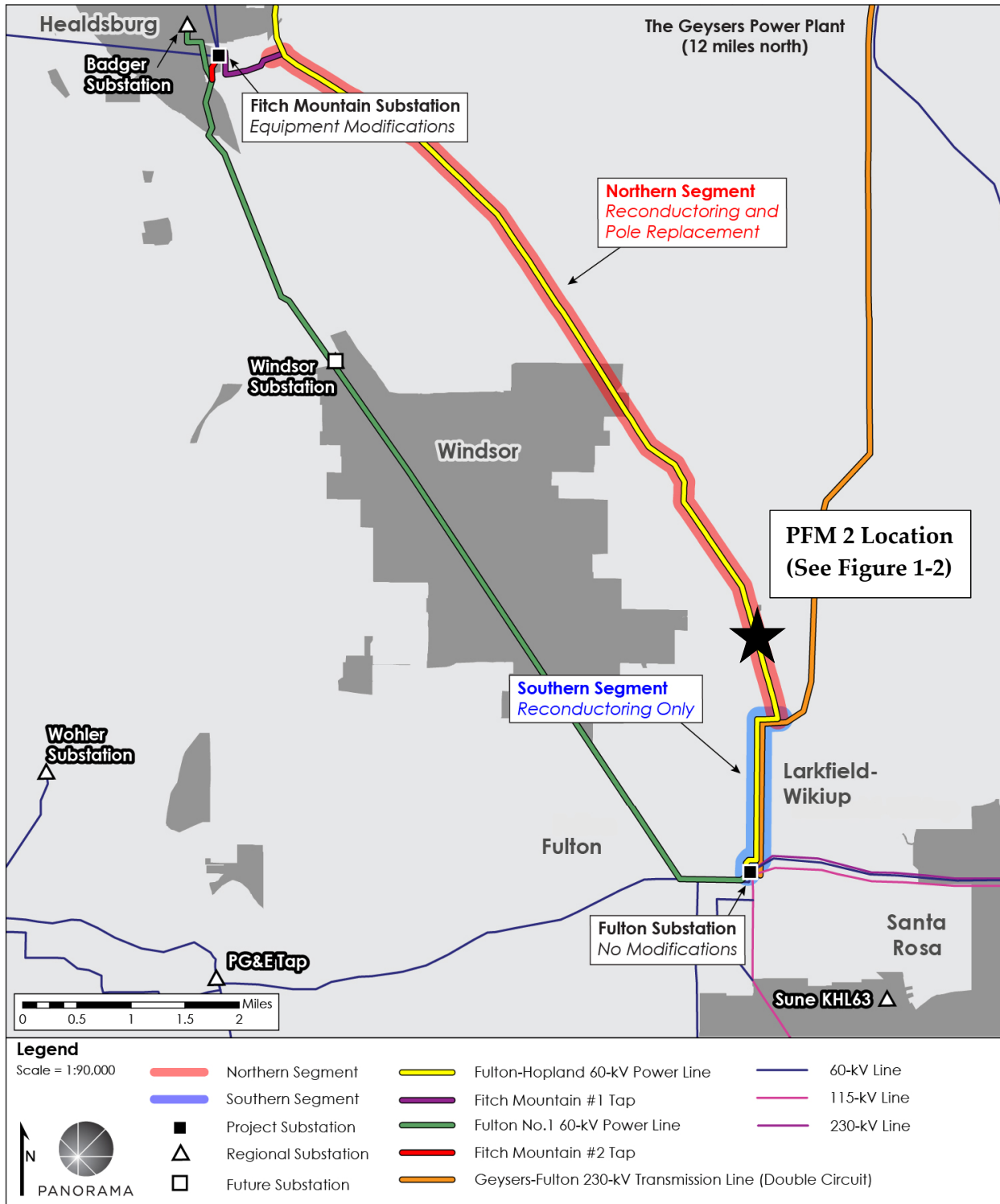
On June 29, 2018, PG&E submitted a Petition for Modification (PFM) (PFM 1) in accordance with Rule 16.4 of the CPUC's Rules of Practice and Procedure in which PG&E proposes to make changes to the Southern Segment of the approved project located within the community of Larkfield-Wikiup. PFM 1 is currently under review by the CPUC and is not addressed in this addendum.

On October 31, 2018, PG&E submitted a second PFM (PFM 2), in accordance with Rule 16.4 of the CPUC's Rules of Practice and Procedure, to use an 845-foot-long existing road to provide alternate access to a construction staging area and helicopter landing zone (LZ) (referred to as Staging Area LZ-3) in the Northern Segment of the approved project. Access to LZ-3 is identified in the Final IS/MND along a portion of Shiloh Ridge Road, a private road owned by the Shiloh Home Owners Association (SHOA), and through an existing vineyard road. The SHOA have expressed concern over PG&E's use of Shiloh Ridge Road for construction activities. The access road approved in the Final IS/MND and the currently proposed access roads are identified on Figure 1-2.

On May 24, 2018, PG&E submitted a Minor Project Refinement (MPR) request to CPUC pursuant to the procedures described in the adopted Mitigation Monitoring and Reporting Program included with the Final IS/MND (procedures further described in the Mitigation Monitoring, Compliance, and Reporting Plan [MMCRP] developed for the project), in which PG&E requested use of the access road described in this addendum. The CPUC denied PG&E's MPR request because the access road is outside of the geographic study area identified in the Project Description of the Final IS/MND. Information from PG&E's initial MPR request for the proposed access road is included with PFM 2.

1 INTRODUCTION

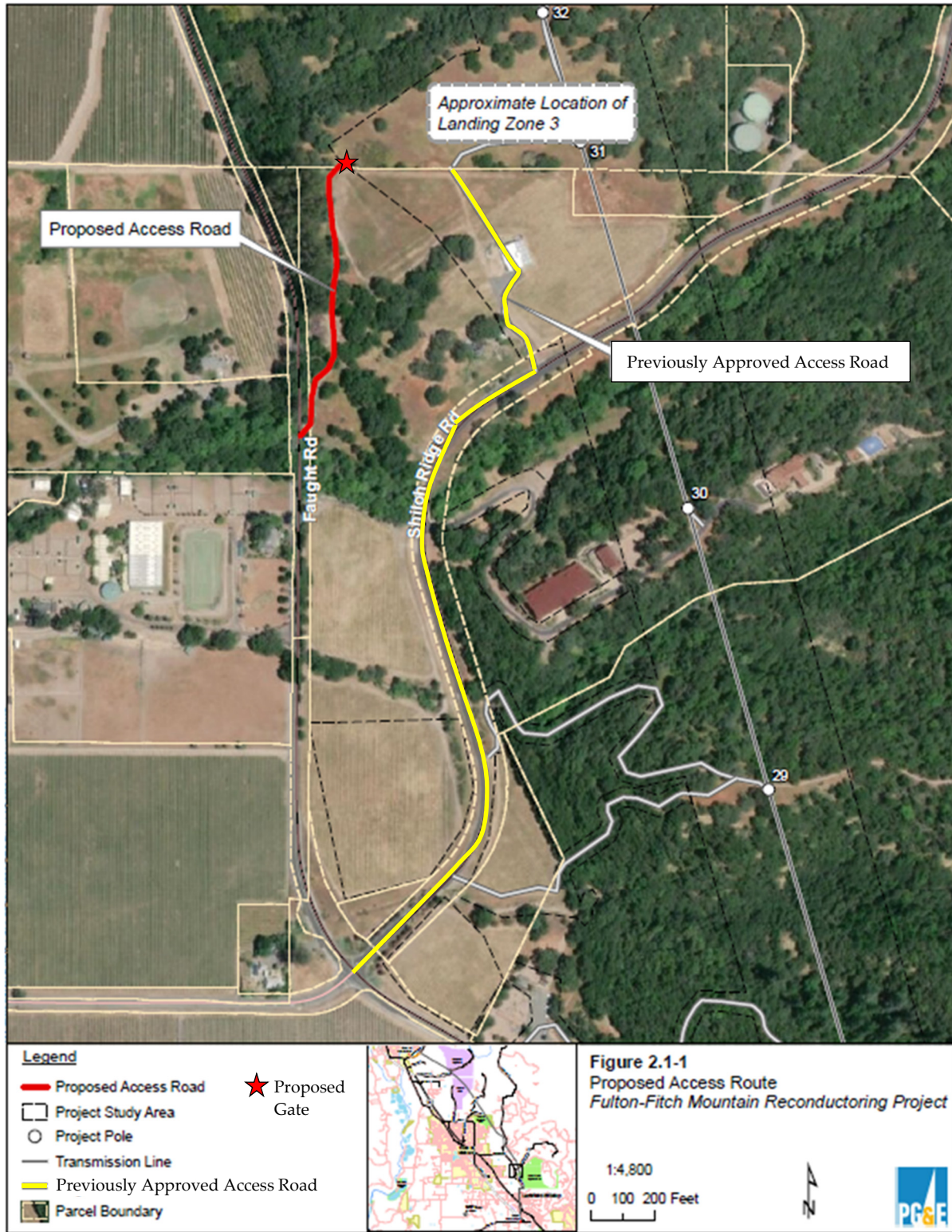
Figure 1-1 Project Alignment and Access Road Location



Sources: (ESRI, 2016; PG&E, 2016-2017)

1 INTRODUCTION

Figure 1-2 Previously Approved and Proposed Access Roads



Source: (TRC, 2018)

1 INTRODUCTION

1.2 CEQA COMPLIANCE

Pursuant to Section 15164 of the CEQA guidelines, an addendum to an adopted MND shall be prepared if only minor technical changes or additions are necessary and none of the conditions described in Sections 15162 and 15163 of the CEQA Guidelines have occurred that call for preparation of a subsequent or supplemental MND. As described in Section 15162(a), a subsequent or supplemental MND would be required if substantial changes occur to the project or substantial changes to the circumstances under which the project is undertaken occur that would involve either (a) a new significant environmental effect or (b) a substantial increase in the severity of a previously identified significant effect.

As shown in the following sections, an addendum is the appropriate method for evaluating PG&E's PFM because the modifications are not substantial and no new significant environmental effects would occur. A substantial increase in the severity of previously identified significant effects would not occur, and no new mitigation measures would be necessary to reduce impacts. No new information of substantial importance has been identified, and none of the conditions described in Sections 15162 and 15163 of the CEQA Guidelines that call for preparation of a subsequent CEQA document are present.

Section 15164(c) of the CEQA Guidelines states that “[a]n addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.” Because the impact determinations in the Final IS/MND have not changed, additional circulation and review of public comments are not required.

2 DESCRIPTION OF PROPOSED MODIFICATION

2 DESCRIPTION OF PROPOSED MODIFICATION

2.1 OVERVIEW

The access route to LZ-3 in the Final IS/MND included turning from Faught Road onto Shiloh Ridge Road, a paved private road that provides access to the Mayacama Golf Course and residences within two homeowners' associations. From Shiloh Ridge Road the landing zone was to be accessed by a 750-foot-long gravel road that extends through a vineyard (Figure 1-2). PG&E asserts it has existing access easements for utility maintenance along both Shiloh Ridge Road and this private gravel road; however, the SHOA has objected to PG&E's use of Shiloh Ridge Road for the project and has urged PG&E to use an alternate access. Concerns included potential damage to the road from heavy vehicles and construction traffic.

PG&E proposes to use an alternate route that would not require use of Shiloh Ridge Road. The alternate route is an 845-foot long gravel road that connects to Faught Road north of Shiloh Ridge Road (Figure 1-2). The proposed access road would be used to facilitate approved access and staging area activities described in the Final IS/MND, including transporting and storing construction materials and equipment, parking vehicles, and transporting workers.

Existing land uses along the proposed access road include a vineyard and private, open space. Surrounding land uses include pasture as well as additional vineyards and private, open space. Two residences are located along Faught Road within 500 feet of the proposed access road. The proposed access road crosses two culverted water features.

2.2 PROJECT COMPONENTS

No changes are proposed to project components identified in the Final IS/MND.

2.3 CONSTRUCTION

Construction of the project is described in Section 2.6 of the Final IS/MND. The proposed modification involves adding a new access road to reach LZ-3 to avoid use of Shiloh Ridge Road. The access road would be used in the same manner as the approved access roads identified in the Final IS/MND. All construction procedures involving access; site development; erosion, sediment, and pollution control; traffic control; and cleanup and restoration would remain the same. No new construction activities or equipment would be introduced. Access would be restricted to the defined road width (approximately 16 feet).

2 DESCRIPTION OF PROPOSED MODIFICATION

Vegetation within 8 feet of the road centerline and up to 14 feet in height would be removed or trimmed to accommodate access for large construction vehicles. Approximately three oak trees with branches that overhang the access road would be trimmed to accommodate project vehicles and equipment. Gravel would be placed on the road bed and road shoulder; no surface grading would occur. A new gate would be installed in an existing fence at the northern end of the access road (Figure 1-2). The gate would be similar in character to other ranch gates found in the area.

PG&E has existing easement rights to access the power line alignment and has received landowner permission to use the proposed access road.

The proposed modifications would not change the workforce or anticipated construction schedule.

2.4 OPERATION AND MAINTENANCE

Operation and maintenance of the approved project is described in Section 2.7 of the Final IS/MND. No changes are proposed to operation and maintenance. The existing road and gate may be used to access the power line during operations and maintenance in the same manner as other access roads using during construction.

2.5 PERMITS AND APPROVALS

Permits and approvals that may be required for the approved project are described in Section 2.8 of the Final IS/MND. No additional permits or approvals are anticipated as a result of the proposed modification.

3 ENVIRONMENTAL ANALYSIS

3.1 AESTHETICS

Impacts of the project on aesthetics were analyzed in Section 3.1 of the Final IS/MND. Use of the proposed access road would involve the same temporary visual impacts during construction as those described in the Final IS/MND, including vegetation and ground disturbance and construction equipment. The new gate that would be installed would be similar in character to other ranch gates found in the area. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.

3.2 AGRICULTURE AND FORESTRY RESOURCES

Impacts of the project on agriculture and forestry resources were analyzed in Section 3.2 of the Final IS/MND. The access road follows an existing road adjacent to agricultural land. Use of the existing road would not convert farmland or affect existing agriculture operations. Limited tree trimming would occur along the road within oak woodland, which may be considered a forestry resource. Impacts from tree trimming and removal within oak woodland were analyzed in the Final IS/MND and were found not to have significant impacts because removal would be minimal, and no commercial forest harvesting occurs in the area. Use of the proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on agriculture or forestry resources.

3.3 AIR QUALITY

Impacts of the project on air quality were analyzed in Section 3.3 of the Final IS/MND. Use of the proposed access road would cause minor levels of fugitive dust during construction similar to the gravel portion of the approved access road and other unpaved access roads and work areas for the project. APM AIR-1 would ensure that impacts from fugitive dust would be minimized and impacts to air quality would remain less than significant. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

3.4 BIOLOGICAL RESOURCES

Impacts of the project on biological resources were analyzed in Section 3.4 of the Final IS/MND. The proposed access road is located outside but contiguous to the project study area analyzed in the Final IS/MND. Vegetation/land cover within 25 feet of the road was surveyed and mapped by PG&E in preparation of their original MPR request. Approximately 0.05 acre of

3 ENVIRONMENTAL ANALYSIS

disturbed land is located along the gravel road consisting of two burn piles. Approximately 0.15 acre of nonnative grassland, 0.08 acre of vineyard, and 0.5 acre of coast live oak woodland are also found along the road (Stantec, 2018a).

The proposed access road also crosses two small, ephemeral watercourses that flow through corrugated metal pipes (i.e., culverts) under the roadway; each are approximately 20 inches in diameter. As described in the Final IS/MND, grassland, oak woodland, and seasonal watercourses provide potentially suitable habitat for special-status plants and wildlife species known to occur in the area. These species are listed in Tables 3.4-4 (plants) and 3.4-5 (wildlife) of the Final IS/MND.

Surface disturbance along the road would be limited to the existing disturbed roadway and non-native grassland along the road shoulders, up to 8 feet from the road centerline. A small portion non-native grassland would be disturbed from gravel placement (less than half of the total 0.15-acre of identified non-native grassland within 25 feet).

Special-status plants are not expected to occur within the non-native grassland adjacent to the road, due to the level of existing disturbance, and the presence of agricultural activities on the north side of the road. No special-status plants were identified during protocol-level plant surveys conducted for the project, which included surveying a large area of non-native grassland that connects to the roadway (roughly 14 acres within and surrounding LZ-3) (TRC, 2017). No impacts on special-status plants are anticipated.

No special-status wildlife species were identified along the road during reconnaissance level surveys; however, trees along the road were identified as potential roosting sites for special-status or otherwise protected bat species (GANDA, 2018; Stantec, 2018a). Tree removal is not anticipated, but approximately three trees would be trimmed to accommodate access for large vehicles. As with construction analyzed for the approved project, there is a low to moderate potential for encountering special-status or otherwise protected wildlife within non-native grassland and oak woodland, including adjacent disturbed areas, that may be present during construction activities.

The proposed access road would involve the same potential for direct and indirect impacts on wildlife as described in the Final IS/MND. Direct impacts could occur from vegetation clearing, tree trimming, watercourse crossing, gravel installation, and operating vehicles and equipment. Indirect impacts could occur from:

- A minor loss of habitat from vegetation removal and/or,
- The reduction of habitat quality along the road associated with vegetation removal, spreading invasive weeds, sudden oak death, causing noise disturbance, dust, sedimentation, erosion, contamination with trash, or hazardous materials.

Potentially significant impacts on wildlife that could occur would be reduced to less-than-significant levels through implementation of APMs and MMs identified in the Final IS/MND. General impacts on special-status wildlife would be reduced through implementation of APM

3 ENVIRONMENTAL ANALYSIS

BIO-1a (worker training), APM BIO-1f (trash management), APM BIO-1g and APM BIO-1h (maintain work area limits), APM BIO-1j (no pets or fire arms), MM Biology-1 (monitoring and resource delineation), MM Biology-8 (invasive weed management), and MM Biology-10 (sudden oak death procedures). Potential impacts on specific species would be reduced by APM BIO-9 (western pond turtle); MM Biology-3 (California red-legged frog); MM Biology-4 (foothill yellow-legged frog); MM Biology-5 (special-status and protected birds); and MM Biology-6 (special-status and protected bats). The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

Impacts of the project on cultural and tribal cultural resources were analyzed in Section 3.5 of the Final IS/MND. The proposed access road is outside of the study area identified in the IS/MND. The records search conducted for the IS/MND included a 0.25-mile buffer around the project alignment, which encompassed the proposed access road. The results of the records search were presented in the 2011 archaeological resources report prepared for the project. Two sites were identified in proximity to the proposed access road: P-49-000823 (midden and lithic scatter) and P-49-001395 (sparse historic refuse scatter) (NCRM, 2011). The sites were outside of the defined area of potential effect; therefore, they were dismissed from further analysis in the report and were not addressed in the Final IS/MND.

The Final IS/MND included MM Cultural-1, MM Cultural-2, MM Cultural-3, and MM Cultural-4, which address procedures for surveying new project areas that may be required, unanticipated discoveries, and evaluation and treatment of potentially eligible cultural resources. A cultural pedestrian survey of the road was conducted in 2018 as part of PG&E's MPR request to use the road. The survey included an impact evaluation of the two known sites and an investigation for other sites that may be present, as required by MM Cultural-3 (Stantec, 2018b). Pre-field research indicated that the area had been previously inventoried in 1985 (Origer, 1985) and 1986 (Stewart, 1986). P-49-000823 (midden and lithic scatter) was identified approximately 100 feet south of the road, and sufficiently away from the access road to ensure no impacts would occur. P-49-001395 (sparse historic refuse scatter) was located within the access road and area of direct impact. A subsequent inventory and eligibility determination were completed for P-49-001395, which included digging soil test pits within 5 feet of the access road to determine the presence or absence of a subsurface artifact deposit associated with the site (Stantec, 2018c). Four of the test pits contained artifacts consisting of obsidian and chert fragments, historic brick fragments, and a piece of green glass; however, the site was recommended ineligible for listing on California Register of Historical Resources (CRHR) on the basis that it lacks (1) clear historical associations, (2) paucity of archaeological information potential, and (3) depositional integrity (Stantec, 2018c). Due to these findings, the site does not meet the conditions that would require further evaluation or treatment, such as avoidance, data recovery, or another form of mitigation, as described in MM Cultural-1 and MM Cultural-4. No other cultural resources or potential tribal cultural resources were identified within the road survey area. The proposed access road would not result in new significant impacts or

3 ENVIRONMENTAL ANALYSIS

substantially increase the severity of previously identified impacts on cultural or tribal resources.

3.6 GEOLOGY, SOILS, AND MINERAL RESOURCES

Impacts of the project related to geology, soils, and mineral resources were analyzed in Section 3.6 of the Final IS/MND. The proposed access road would not require any earthmoving activities and would not result in the loss of topsoil. Use of the road would not result in erosion. The access road would not result in a new impact or increase the severity of a previously analyzed impact related to geology, soils, or mineral resources.

3.7 GREENHOUSE GAS EMISSIONS

Impacts of the project related to greenhouse gas (GHG) emissions were analyzed in Section 3.7 of the Final IS/MND. Use of the proposed access road would not change equipment use estimates or distances traveled for access that were described in the Final IS/MND. APM AIR-2 and APM GHG- 2 would ensure that any impacts from GHG emissions would remain less than significant. The new access road would not result in a new impact or increase the severity of a previously analyzed impact related to GHG emissions.

3.8 HAZARDS AND HAZARDOUS MATERIALS

Impacts of the project related to hazards and hazardous materials were analyzed in Section 3.8 of the Final IS/MND. Hazardous materials (i.e., fuels, oils, and lubricants) would be transported on the proposed access road to the staging area, the same as would occur on the approved access road. Impacts from transporting and using hazardous materials would be less than significant with implementation of MM Hazards-1, which requires development and implementation of a Stormwater and Pollution Prevention Plan (SWPPP). The proposed access road does not contain any known hazardous material sites. The proposed access road passes through vegetation including grassland and oak woodland, which poses a fire risk under dry conditions. The risk of igniting fires during construction from operating equipment in and around dry vegetation was analyzed in the Final IS/MND and found to be less than significant with implementation of fire prevention procedures defined in APMs and MMs. The increased risk of fire during construction would be less than significant with implementation of APM HM-3 (smoking restrictions), APM HM-3 (carrying appropriate fire response equipment), and MM Hazards-2 (development and implementation of a Construction Fire Prevention Plan). The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact related to hazards and hazardous materials.

3.9 HYDROLOGY AND WATER QUALITY

Impacts of the project on hydrology and water quality were analyzed in Section 3.9 of the Final IS/MND. The proposed access road crosses two seasonal watercourses that flow through

3 ENVIRONMENTAL ANALYSIS

existing corrugated metal culverts that are 20 inches in diameter. Although not anticipated, the culverts may be reinforced, repaired, or replaced either before or after construction, if necessary. If the culverts are modified, MM Hydrology-5, which requires PG&E to obtain culvert design approval from the County, would be implemented to avoid any increase in flooding or erosion on adjacent stream banks or slopes. Ground disturbance and transport of hazardous materials along the road and adjacent to drainages has the potential to impact water quality in the same manner as other access roads addressed in the Final IS/MND. Implementation of MM Hydrology-1 and MM Hydrology-2 would ensure potential impacts on water quality would be less than significant through development and implementation of the SWPPP. The proposed road would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

3.10 LAND USE AND PLANNING

Impacts of the project related to land use and planning were analyzed in Section 3.10 of the Final IS/MND. The proposed access road is located on an existing road through private property and would not result in a new impact or increase the severity of a previously analyzed impact on land use and planning.

3.11 NOISE

Impacts of the project related to noise were analyzed in Section 3.11 of the Final IS/MND. Noise-emitting construction activities on the access road would be the same as those described in the Final IS/MND for the approved access road. Use of the proposed access road would result in the same types of temporary noise impacts described in the Final IS/MND. Sensitive receptors (e.g., residences) are located within 500 feet of the road; however, project activities on the road would not occur closer than the distances analyzed in the IS/MND or exceed noise thresholds at the closest receptor. Potential impacts from noise disturbance would be less than significant with implementation of MM Noise-1, which requires PG&E to notify receptors in advance of construction activities and respond to noise complaints. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on noise.

3.12 PALEONTOLOGICAL RESOURCES

Impacts of the project on paleontological resources were analyzed in Section 3.12 of the Final IS/MND. No grading, new excavations, or digging would be performed along the access road; therefore, any paleontological resources that may be present would not be impacted. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on paleontological resources.

3 ENVIRONMENTAL ANALYSIS

3.13 POPULATION AND HOUSING

Impacts of the project related to population and housing were analyzed in Section 3.13 of the Final IS/MND. The proposed access road would have no effect on population and housing and the findings in the Final IS/MND would remain the same. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on population and housing.

3.14 RECREATION

Impacts of the project related to recreation were analyzed in Section 3.14 of the Final IS/MND. The proposed access road is located on private land and would not result in impacts related to recreation. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact related to recreation.

3.15 TRANSPORTATION AND TRAFFIC

Impacts of the project related to traffic and transportation were analyzed in Section 3.15 of the Final IS/MND. The proposed access road modification to LZ-3 would divert construction traffic from two private road segments (Shiloh Ridge Road and a gravel vineyard road) to another private road (a private gravel road south of the same vineyard). Both of these roads connect to Faught Road. Use of the proposed access road would not change construction traffic levels on Faught Road, potential traffic congestion conditions, or potential traffic hazards from those described in the Final IS/MND. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

3.16 UTILITIES AND PUBLIC SERVICES

Impacts of the approved project related to utilities and public services were analyzed in Section 3.16 of the Final IS/MND. The proposed access road would have no effect on utilities and public services. Use of the proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on utilities and public services.

3.17 MANDATORY FINDINGS OF SIGNIFICANCE

Mandatory findings of significance that could result in an environmental impact were analyzed in Section 3.16 of the Final IS/MND. The proposed access road would not change the findings presented in the Final IS/MND on mandatory findings of significance.

Impacts on environmental quality, habitat, rare and endangered plants and animals, and cultural history and prehistory would be less than significant with implementation of APM BIO-1a, APM BIO-1f, APM BIO-1j, APM BIO-1k, APM BIO-7, APM BIO-8, APM BIO-9, MM Biology-1, MM Biology-2, MM Biology-3, MM Biology-4, MM Biology-5, MM Biology-6,

3 ENVIRONMENTAL ANALYSIS

MM Biology-7, MM Biology-8, MM Biology-9, APM CR-1, MM Cultural-1, MM Cultural-2, MM Cultural-3, and MM Cultural-4.

Cumulative impacts of the project would not change. Potential cumulative impacts would be less than significant with implementation of APM AIR-1, APM AIR-2, APM BIO-10, APM CR-1, MM Biology-1, MM Biology-2, MM Biology-3, MM Biology-4, MM Biology-5, MM Biology-6, MM Biology-7, MM Cultural-1, MM Cultural-2, MM Cultural-3, MM Cultural-4, MM Hydrology-1, MM Hydrology-2, MM Noise-1, MM Noise-2, MM Noise-3, MM Noise-4, MM Noise-5, MM Recreation-2, MM Traffic-1, and MM Traffic-2.

Adverse impacts on human beings would not change. Potential adverse impacts on human beings would be less than significant with implementation of APM HM-3, APM HM-4, APM REC-1, MM Hazards-1, MM Noise-1, MM Noise-2, MM Noise-3, MM Traffic-1, MM Traffic-2, and MM Traffic-3.

The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact associated with mandatory findings of significance.

4 CONCLUSION

4 CONCLUSION

The proposed modification to the project that includes the use of an alternate access road to access LZ-3 would not result in new significant impacts or substantially increase the severity of previously identified impacts on the environment. No new MMs are required to ensure that impacts will remain less than significant. No new information of substantial importance has been identified, and none of the conditions described in Sections 15162 and 15163 of the CEQA Guidelines that call for preparation of a subsequent CEQA document are present.

5 REFERENCES

- Garcia and Associates. (2018). *Addendum to March 2018 Bat Roosting Habitat Assessment for the Fulton-Fitch Mountain Reconductoring Project*. Mountain View: Garcia and Associates.
- CPUC. (2017). *Fulton-Fitch Mountain Reconductoring Project Final Initial Study/Mitigated Negative Declaration*. San Francisco, CA: Panorama Environmental, Inc.
- ESRI. (2016). Raster, vector, and on-line GIS Data resources.
- GANDA. (2018, May). *Addendum to March 2018 Bat Roosting Habitat Assessment for the Fulton-Fitch Mountain Reconductoring Project*.
- NCRM. (2011, August 12). *Archaeological Resources Survey for the Fulton-Fitch Mountain 60 kV Reconductoring Project, Sonoma County, California*.
- Origer, T. a. (1985). *California Department of Parks and Recreation (DPR) Primary Record Form for P-49-001395/CA-SON-1494H*. California Department of Parks and Recreation.
- PG&E. (2016-2017). *Miscellaneous materials and data. PG&E Responses to CPUC Deficiency Reports #1, #2, and #3, and Data Need Requests #1, #2, #3, and #4*.
- Stantec. (2018a). *Fulton-Fitch Mountain Reconductoring Project: Vegetation Survey at the New Access Road to Landing Zone 3*. San Francisco: Stantec.
- Stantec. (2018b). *A Cultural Resources Pedestrian Inventory and Evaluation Report of 0.29 Acres for Pacific Gas & Electric Company's Proposed MPR-03 for the Fulton-Fitch Mountain*. San Francisco: Stantec.
- Stantec. (2018c, August). *A Cultural Resources Pedestrian Inventory and Evaluation Report of 0.29 Acres for Pacific Gas & Electric*.
- Stewart, S. B. (1986). *An Archaeological Study of the Coppin Property at 5991 Faught Road, Santa Rosa, California*. Rohnert Park: California Historical Resources Information System.
- TRC. (2017, October). *Rare Plant Survey Report. Pacific Gas & Electric Company's Fulton-Fitch Mountain Reconductoring Project. Sonoma County, California*.
- TRC. (2018, October). *Second Supplemental Proponent's Environmental Assessment. Fulton-Fitch Mountain Reconductoring Project*.
- USDA. (2014). *National Agriculture Imagery Program (NAIP) Aerial Imagery*.

APPENDIX A SECOND SUPPLEMENTAL PROPONENT'S ENVIRONMENTAL ASSESSMENT

Second Supplemental Proponent's Environmental Assessment

Fulton-Fitch Mountain Reconductoring Project

**Prepared for
Pacific Gas and Electric Company
October 2018**

Prepared by



1920 Old Middlefield Way
Mountain View, CA 94043

TABLE OF CONTENTS

<i>Chapter/Section</i>	<i>Page</i>
1.0 INTRODUCTION.....	1-1
1.1 Revisions to the Approved Project	1-1
1.2 Organization of the Supplemental PEA.....	1-1
2.0 DESCRIPTION OF PROJECT MODIFICATIONS.....	2-2
2.1 Location And Overview Of Project Modifications.....	2-2
2.2 Project Components	2-2
2.3 Construction	2-2
2.3.1 Overview	2-2
2.3.2 Work Areas and Access	2-5
2.3.3 Site Development.....	2-5
2.3.4 Pole Removal, Replacement, and Installation	2-5
2.3.5 Reconductoring.....	2-5
2.3.6 Traffic Control.....	2-5
2.3.7 Water Use	2-5
2.3.8 Waste Disposal	2-5
2.3.9 Cleanup and Restoration.....	2-6
2.3.10 Equipment and Workforce	2-6
2.3.11 Schedule and Timing.....	2-6
2.4 Operation and Maintenance.....	2-6
2.5 Permits and Approvals.....	2-6
2.6 Electric and Magnetic Fields	2-6
3.0 ENVIRONMENTAL ANALYSIS	3-1
3.1 Aesthetics	3-1
3.2 Agriculture and Forestry Resources.....	3-3
3.3 Air Quality	3-3
3.4 Biological Resources	3-3
3.4.1 Definitions	3-3
3.4.2 Environmental Setting	3-3
3.4.3 Impact Analysis	3-4
3.4.4 Conclusions.....	3-6
3.5 Cultural Resource	3-6
3.5.1 Definitions	3-6
3.5.2 Environmental Setting	3-6
3.5.3 Impact Analysis.....	3-6

3.5.4	Conclusions.....	3-8
3.6	Geology, Soils, and Mineral Resources	3-8
3.7	Greenhouse Gas Emissions	3-8
3.8	Hazards and Hazardous Materials	3-8
3.9	Hydrology and Water Quality	3-9
3.10	Land Use.....	3-9
3.11	Noise.....	3-9
3.12	Paleontological Resources	3-9
3.13	Population and Housing	3-10
3.14	Recreation.....	3-10
3.15	Traffic and Transportation	3-10
3.16	Utilities and Public Services	3-10
3.17	Mandatory Findings of Significance	3-10
3.17.1	Impact Analysis	3-10
3.17.2	Conclusions.....	3-11
4.0	REFERENCES.....	4-1

FIGURES

Figure 2.1-1:	Proposed Access Route.....	2-3
Figure 3.1-1:	Photograph of entrance to access road from Faught Road looking east.....	3-1
Figure 3.1-2:	Photograph along access road looking north towards Staging Area LZ-3.....	3-2
Figure 3.1-3:	Photograph of access road looking south from Staging Area LZ-3.....	3-2

1.0 INTRODUCTION

On December 18, 2017, the California Public Utilities Commission (CPUC) issued Decision 17-12-012 granting Pacific Gas & Electric (PG&E) a Permit to Construct (PTC) the Fulton-Fitch Mountain Reconductoring Project and adopting the Final Initial Study/Mitigated Negative Declaration (2017 Final MND) in compliance with the California Environmental Quality Act (CEQA). D.17-12-012 provides that any project refinements, no matter how minor, must be approved in a petition for modification (PFM) if they occur outside of the project study area. (D.17-12-012, at 7-8.) To reduce unanticipated impacts to area residents, including those in the Shiloh Home Owners’ Association (SHOA), PG&E is requesting approval to use an existing roadway adjacent to the project study area to access Staging Area Landing Zone-3 (LZ-3). PG&E is submitting this Second Supplemental Proponent’s Environmental Assessment (Second Supplemental PEA or Second Supp. PEA) in support of the PFM to confirm that no new or additional significant impacts would result from use of this 845-foot roadway adjacent to the project study area.

1.1 REVISIONS TO THE APPROVED PROJECT

In its PTC application, PG&E proposed to locate a staging area and landing zone on property north of the community of Larkfield-Wikiup in unincorporated Sonoma County. Access was proposed along an existing gravel road extending from Shiloh Ridge Road, a private, paved road with access to the Mayacama Golf Course and residences within two homeowners’ associations. PG&E has existing access easements for utility maintenance over these roadways. The SHOA has objected to PG&E’s use of the Shiloh Ridge Road for this project and has urged PG&E to use an alternate access. Unfortunately, although impacts on the homeowners could be eliminated by utilizing the alternate route, the alternative is not within the original project study area and PG&E must apply for a PFM to use the new route.

PG&E proposes to utilize an existing, approximately 0.16-mile (845-foot) access road to Staging Area LZ-3, totaling approximately 0.29 acres. Landowner permission to use the alternative route has already been obtained. The proposed access route extends off Faught Road, just north of Shiloh Ridge Road, and along an agricultural field into the western side of Staging Area LZ-3. The proposed access route would be used to facilitate approved staging area activities.

1.2 ORGANIZATION OF THE SUPPLEMENTAL PEA

Details of the proposed project modifications and related revisions in the construction plan are described below in Chapter 2, “Description of Project Modifications.” An analysis of these modifications is contained in Chapter 3, “Environmental Analysis.” The analysis of project modifications in Chapter 3 demonstrates that only minor changes to the 2017 Final MND are necessary to reflect the proposed modifications to the project, and none of the conditions described in Section 15162(a) of the CEQA Guidelines calling for preparation of a subsequent negative declaration would occur. Thus, an addendum to the 2017 Final MND is the appropriate mechanism to address these modifications to the project.

2.0 DESCRIPTION OF PROJECT MODIFICATIONS

2.1 LOCATION AND OVERVIEW OF PROJECT MODIFICATIONS

PG&E proposes to use a different route along an existing access road to reach Staging Area LZ-3. As shown on Figure 2.2-1, Proposed Access Route, the proposed 0.16-mile access route would extend from Faught Road, just north of Shiloh Ridge Road, to the western portion of Staging Area LZ-3. The new access route, approximately 845 feet long and totaling approximately 0.29 acres, would facilitate approved staging area activities, including helicopter landing, storing construction materials and equipment, refueling equipment and helicopters, parking vehicles and equipment, collecting construction waste prior to disposal, and conducting construction workforce meetings.

As shown on Figure 2.2-1, the approved project access to Staging Area LZ-3 utilizes an existing gravel road off Shiloh Ridge Road. Shiloh Ridge Road is a private paved road and provides the only access to the Mayacama Golf Course and residences belonging to two homeowners' associations. The Shiloh Home Owners Association (SHOA) has expressed concerns with traffic impacts, dirt/mud tracking and truck damage to the paved road surface concerning use of the approved project access road. The proposed access road will address the homeowners' association concerns by curtailing the need for project vehicles to travel on Shiloh Ridge Road. The proposed access is critical to enable staging and work activities for construction of the project.

Existing land uses along the proposed access route include a vineyard and private, open space. Surrounding land uses include pasture as well as additional vineyards and private, open space. Two residences are located along Faught Road, a public road, within 500 feet of the proposed access route. The proposed access road crosses two culverted water features.

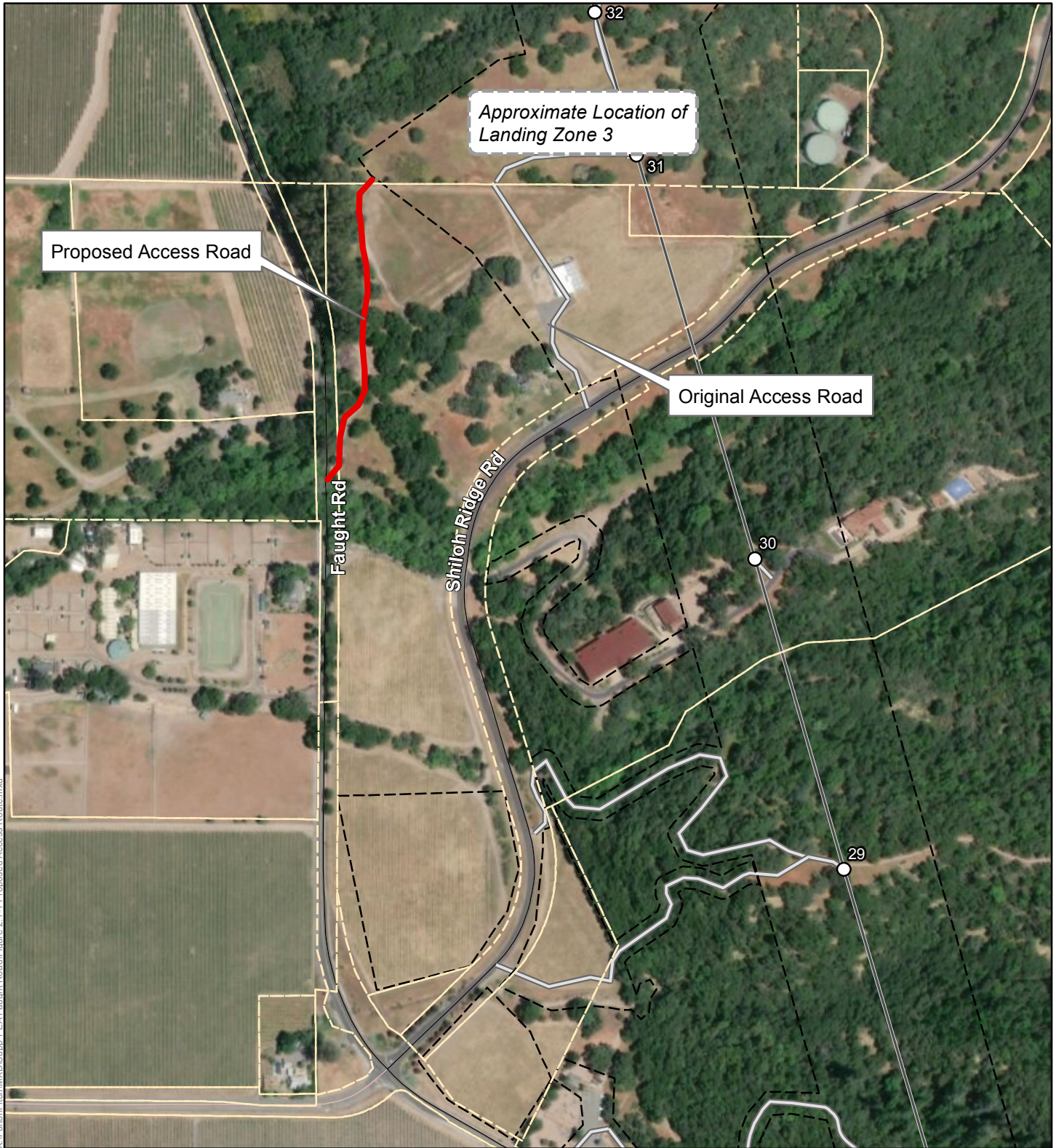
2.2 PROJECT COMPONENTS

No changes are proposed to project components.

2.3 CONSTRUCTION

2.3.1 OVERVIEW

This PFM proposes a different existing access road to reach Staging Area LZ-3. No changes are proposed to aerial access, pole work areas, pull sites, or mid-span work locations.



X:\FultonFitch\MXD\Supp FEA\Faught\Road\Figure 2.1-1\Proposed Access Route.mxd

- Legend**
- Proposed Access Road
 - Project Study Area
 - Project Pole
 - Transmission Line
 - Original Access Road
 - Parcel Boundary

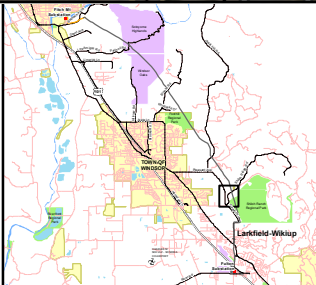


Figure 2.1-1
Proposed Access Route
Fulton-Fitch Mountain Reconductoring Project

1:4,800
0 100 200 Feet



[This page left intentionally blank]

2.3.2 WORK AREAS AND ACCESS

2.3.2.1 PG&E Easements and Access Rights

PG&E has existing access rights and has been in contact with the parcel owner.

2.3.2.2 Ground Access

The proposed project modification consists of approximately 0.16 miles (845 feet) of existing gravel access road contiguous with but outside the boundary of the Final IS/MND Project Study Area. As with the approved project, preparation of the proposed route will require vegetation clearing within 8 feet of the road centerline and up to 14 feet in height; gravel will be placed in the road bed. A new gate will be installed.

2.3.2.3 Vegetation Clearance

Vegetation clearance would occur within the approximate 0.29-acre area. Approximately three oak trees with branches that overhang the access road would be trimmed to accommodate project vehicles and equipment. The amount of vegetation clearing and tree trimming will remain within the range described in Table 2.6-6 of the Final MND.

2.3.2.4 Ground Disturbance

Ground disturbance for the approved project is described on pages 2-30 and 2-31 of the 2017 Final MND. Use of the proposed access road will replace use of an approved access road that is similar in length and width. Some gravel will be added, but no additional ground disturbance is anticipated. The amount of ground disturbance will remain within the range described in Table 2.6-6 of the Final MND.

2.3.3 SITE DEVELOPMENT

Site development will proceed as described in Section 2.6.3 of the Final MND.

2.3.4 POLE REMOVAL, REPLACEMENT, AND INSTALLATION

No changes are proposed to pole removal, replacement, and installation.

2.3.5 RECONDUCTORING

No changes are proposed to reconductoring.

2.3.6 TRAFFIC CONTROL

Traffic control for the approved project is described in Section 2.6.8 of the Final MND. Traffic Control Measures for the proposed access road would be the same as for the approved project.

2.3.7 WATER USE

No changes are anticipated to water use.

2.3.8 WASTE DISPOSAL

No changes are anticipated to waste disposal.

2.3.9 CLEANUP AND RESTORATION

Cleanup and restoration will proceed as described in Section 2.6.11 of the Final MND.

2.3.10 EQUIPMENT AND WORKFORCE

The approved project workforce and equipment for the Northern Segment are described in the Final MND on page 2-44 and in Table 2.6-7 (pages 2-45 to 2-48). No changes are proposed to the approved equipment and workforce.

2.3.11 SCHEDULE AND TIMING

The approved project schedule for the Northern Segment is described in Section 2.6.13 “Schedule and Timing” in the Final MND. No changes are proposed to the schedule.

2.4 OPERATION AND MAINTENANCE

Operation and maintenance of the approved project is described in Section 2.7 “Operation and Maintenance” of the 2017 Final MND (CPUC 2017, pages 2-51 to 2-52). No changes are proposed to operation and maintenance.

2.5 PERMITS AND APPROVALS

Permits and approvals that may be required for the approved project are described in Section 2.8 “Permits and Approvals” of the 2017 Final MND (CPUC 2017, pages 2-52 to 2-54). No additional permits or approvals are anticipated as a result of the proposed modifications.

2.6 ELECTRIC AND MAGNETIC FIELDS (EMF)

The proposed modification will not result in any changes to EMF.

3.0 ENVIRONMENTAL ANALYSIS

3.1 AESTHETICS

Section 3.1 of the 2017 Final MND described and analyzed impacts of the approved project on aesthetic resources (CPUC 2017: Final MND pages 3.1-1 to 3.1-36). That discussion is hereby incorporated by reference.

The proposed change in access route will improve aesthetic impacts, as it will eliminate future potential road dirt and traffic on the newly-paved Shiloh Ridge Road. Instead of turning east onto Shiloh Ridge Road, construction traffic will continue approximately one-half mile further on Faught Road and turn east onto an existing, unpaved access road to the staging area. This 845-foot road is on private property, with landowners who have no objection to the access and who have granted PG&E an easement in October 2018. Views of the existing access road are shown in Figures 3.1-1, 3.1-2, and 3.1-3.



Figure 3.1-1: Photograph of entrance to access road from Faught Road looking east



Figure 3.1-2: Photograph along access road looking north towards Staging Area LZ-3



Figure 3.1-3: Photograph of access road looking south from Staging Area LZ-3

Approved work is already occurring in the work area, Staging Area LZ-3, now being accessed from the Shiloh Ridge Road direction. The proposed change in access route would not result in any impacts to aesthetics that have not already been discussed in the 2017 Final MND. No trees will be removed. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.

3.2 AGRICULTURE AND FORESTRY RESOURCES

Section 3.2 of the 2017 Final MND described and analyzed impacts of the approved project related to agricultural and forestry resources (CPUC 2017: Final MND pages 3.2-1 to 3.2-12). That discussion is hereby incorporated by reference.

The new access route is along an existing road and would not result in the conversion of farmland to non-agricultural land. The access road would not result in a new impact or increase the severity of a previously analyzed impact on agriculture or forestry resources.

3.3 AIR QUALITY

Section 3.3 of the 2017 Final MND described and analyzed impacts of the approved project related to air quality conditions in and around the project site (CPUC 2017: Final MND pages 3.3-1 to 3.3-21). That discussion is hereby incorporated by reference.

Like use of the existing route to Staging Area LZ-3, use of the proposed access route could result in the creation of fugitive dust during construction. APM AIR-1 would ensure that impacts from fugitive dust would be minimized and impacts to air quality would remain less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

3.4 BIOLOGICAL RESOURCES

3.4.1 DEFINITIONS

This discussion adopts the definitions included in Section 3.4.1 of the 2017 Final MND (CPUC 2017: Final MND pages 3.4-1 to 3.4-2).

3.4.2 ENVIRONMENTAL SETTING

The “Environmental Setting” discussion in Section 3.4.3 of the 2017 Final MND described biological resources in the project area and identified special-status species with potential to be impacted by the approved project (CPUC 2017: Final MND pages 3.4-4 to 3.4-18). That discussion is hereby incorporated by reference. The proposed access route is contiguous with the project study area analyzed in the 2017 Final MND, and the range of special-status species, vegetation types, and habitat types are the same.

A vegetation survey and vegetation mapping of the proposed access route and all areas within 25 feet was conducted on May 2, 2018 (Stantec 2018a). At the time of the survey, the existing unpaved access road appeared used and maintained with gravel in some locations, with non-native grasses along the center of the road. The vegetation/land cover types present adjacent to

the road include 0.05 acres of disturbed land consisting of two burn piles, 0.15 acres of non-native grassland, 0.08 acres of vineyard, and 0.5 acres of coast live oak woodland. The survey report notes that the proposed access route crosses two small, ephemeral watercourses that flow through corrugated metal pipes under the roadway, approximately 2 feet in diameter.

Because trees will need to be trimmed, an assessment of bat-roosting habitat was conducted on May 14-15, 2018 (GANDA 2018). The assessment consisted of visual inspection of three oak trees potentially requiring trimming and determined that potential bat-roosting habitat was present.

3.4.3 IMPACT ANALYSIS

The “Impact Analysis” discussion in Section 3.4.4 of the 2017 Final MND analyzed impacts on biological resources that would occur during construction, operation, and maintenance of the proposed project (CPUC 2017: Final MND pages 3.4-18 to 3.4-45). That discussion is hereby incorporated by reference.

a) Would the proposed project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS? *Less-than-Significant Impact With Mitigation*

Because the new route is located adjacent to the original project study area, use of the proposed access road has the potential to cause the same direct and indirect impacts to the same special-status species as the existing project as described in the 2017 Final MND. The proposed access route crosses two water features with existing culverts. Approximately 3 trees will be trimmed to allow clearance for construction vehicles and equipment, all of which provide potential bat roosting habitat. PG&E would implement mitigation measure (MM) Biology-6 prior to trimming trees that could provide bat roosting habitat to ensure that any impacts to special-status or otherwise-protected bat roosts will be less than significant. Implementation of applicant-proposed measures (APMs) and mitigation measures APM BIO-1a, APM BIO-1g, APM BIO-1h, APM BIO-1j, APM BIO-1k, APM BIO-7, APM BIO-8, APM BIO-9, MM Biology-1, MM Biology-2, MM Biology-3, MM Biology-4, MM Biology-5, and MM Hydrology-4 would reduce direct impacts to less than significant. Implementation of APM BIO-1f, APM BIO-8, MM Biology-5, MM Biology-6, MM Biology-7, MM Biology-8, APM HM-3, APM HM-4, MM Hazards-1, and MM Hazards-2 would reduce indirect impacts to less than significant. Impacts would remain less than significant with mitigation.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service? *Less-than-Significant Impact With Mitigation*

As was the case with the existing project, trees will be trimmed to provide clearance for construction vehicles and equipment along the proposed access road. No trees are planned to be removed, and approximately 3 trees are identified for trimming. As necessary, PG&E will comply with the project’s Revegetation, Restoration, and Monitoring Plan, approved by the CPUC on June 13, 2018, as described in MM Biology-7 in the 2017 Final MND. That plan would require PG&E to replace any trees or shrubs removed on a 1:1 basis. PG&E would also

implement MM Biology-9, which requires PG&E to avoid sensitive natural plant communities to the greatest extent feasible and mitigate for unavoidable impacts on sensitive vegetation communities at a 1:1 ratio, and MM Biology-1, which describes the biologist’s qualifications. As is the case for the existing project, the temporary impact on riparian woodland would remain less than significant with mitigation.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? *Less-than-Significant Impact With Mitigation*

Two seasonal watercourses flow through existing culverts beneath the proposed access road. PG&E would implement MM Hydrology-4, which requires PG&E to specify methods to minimize impacts to seasonal watercourses, and MM Biology-11, which requires additional protection procedures and, if there were any impact, compensatory mitigation at a 2:1 ratio for every acre of impact to jurisdictional waters. No such impacts are expected. As with the existing project, PG&E would implement MM Biology-8 (noxious weeds) and MM Hazards-1 (hazardous materials procedures) to address indirect impacts to jurisdictional waters. Project impacts with use of the proposed access road would remain less than significant with mitigation.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? *Less-than-Significant Impact With Mitigation*

As is the case with the existing project, construction of the proposed pole replacements would occur in proximity to suitable aquatic habitats that can serve as dispersal corridors for amphibians and reptiles. Two seasonal watercourses flow through existing culverts beneath the proposed access road. PG&E would implement APM BIO-9, which requires a qualified biologist to relocate western pond turtles out of the way of construction, and MM Biology-3 to reduce impacts on amphibians by exclusion fencing.

As is the case for the existing project, use of the proposed access road could impede or discourage migratory birds nesting near construction sites. PG&E would implement MM Biology-5, which specifies seasonal work avoidance buffers for active nests.

Impacts would remain less than significant with mitigation.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? *No Impact*

As is the case for the existing project, use of the proposed access road will involve vegetation trimming within oak woodland/forest. However, the total area impacted is anticipated to remain within the amount and number approximated in the 2017 Final MND. PG&E would implement APM BIO-10, which ensures consistency with the Sonoma County Zoning Ordinance Article 67. The proposed modifications to the project would not alter the significance conclusions presented in the 2017 Final MND.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?
*Less-than-Significant Impact With Mitigation***

The proposed access road is located within the boundary of PG&E’s Bay Area Habitat Conservation Plan. PG&E would comply will applicable measures of this plan; thus, the proposed access road would not conflict with a habitat conservation plan.

3.4.4 CONCLUSIONS

The proposed modifications to the Fulton-Fitch Mountain Reconductoring Project would not result in new significant impacts or substantially increase the severity of previously identified impacts to biological resources. No new mitigation measures are required to ensure that impacts will remain less than significant.

3.5 CULTURAL RESOURCE

3.5.1 DEFINITIONS

This discussion adopts the definitions included in Section 3.5.1 of the 2017 Final MND (CPUC 2017: Final MND pages 3.5-1 to 3.5-3).

3.5.2 ENVIRONMENTAL SETTING

The “Environmental Setting” discussion in Section 3.5.2 of the 2017 Final MND described cultural and tribal resources in the project area and cultural and tribal resources with potential to be impacted by the approved project. This section also includes information about the regional setting, records search results, pedestrian survey summary, and Native American coordination (CPUC 2017: Final MND pages 3.5-4 to 3.5-12). That discussion is hereby incorporated by reference.

A cultural resources pedestrian inventory of the proposed existing access road was conducted on June 6, 2018 (Stantec 2018). The survey examined an Area of Direct Impact (ADI) that encompassed the length of the access road extending into Staging Area LZ-3 and included an assessment of subsurface disturbance to a depth of 5 inches.

Prefield research indicated that the area had been previously inventoried in 1985 (Origer) and 1986 (Stewart). One resource (P-49-000823; midden and lithic scatter) was identified approximately 100 feet south of the new access road ADI, and one resource (P-49-001395; sparse historic refuse scatter) is located within the access road ADI. Site testing consisting of several soil pits within 5 feet of the access road was conducted to determine the presence or absence of a subsurface artifact deposit associated with P-49-001395. Four of the test pits contained artifacts consisting of obsidian and chert fragments, historic brick fragments, and a piece of green glass.

3.5.3 IMPACT ANALYSIS

The “Impact Analysis” discussion in Section 3.5.3 of the 2017 Final MND analyzed impacts on cultural resources that would occur during construction, operation, and maintenance of the

proposed project (CPUC 2017: Final MND pages 3.5-12 to 3.5-17). That discussion is hereby incorporated by reference.

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? *Less-than-Significant Impact With Mitigation*

Stantec (2018b) determined that P-04-001395 is recommended ineligible to the California Register of Historic Resources for its lack of clear historical associations, paucity of archaeological information potential, and lack of depositional integrity. Since the proposed access road does not require additional ground disturbance, the resource will not be impacted by the project.

Because test excavations at the site focused on the archaeological deposits near the existing road to be used for project activities, PG&E crews and project equipment will remain in the established access road at all times and will implement APM CR-1 to avoid impacts to unknown cultural resources.

Use of the proposed access road will not result in additional impacts on historic resources beyond what was discussed in the 2017 Final MND and this impact would remain less than significant with mitigation.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? *Less-than-Significant Impact With Mitigation*

As discussed in significance criterion “a,” use of the proposed access road will not result in additional impacts on archeological resources. As with the approved project, impacts would remain less than significant with mitigation.

c) Disturb any human remains, including those interred outside of formal cemeteries. *Less-than-Significant Impact*

The proposed access road will be used to enter and exit the construction staging area and no excavation work will occur. As with the approved project, this impact will remain less than significant.

d) Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC §5020.1(k)?, or**
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence and with consideration of the significance of the resource to a California Native American tribe, to be significant pursuant to criteria set forth in subdivision (c) of PRC §5024.1? *Less-than-Significant Impact with Mitigation***

The proposed access road will be used to enter and exit the construction staging area and no excavation work will occur. PG&E would implement MM Cultural-2, which specifies requirements for cultural resources training. As with the approved project, impacts would remain less than significant with mitigation.

3.5.4 CONCLUSIONS

The proposed modifications to the Fulton-Fitch Mountain Reconductoring Project would not result in new significant impacts or substantially increase the severity of previously identified impacts to cultural or tribal resources. No new mitigation measures are required to ensure that impacts will remain less than significant. No new information of substantial importance related to cultural or tribal resources has been identified, and none of the conditions described in Public Resource Code sections 15162 and 15163 that call for preparation of a subsequent negative declaration are present.

3.6 GEOLOGY, SOILS, AND MINERAL RESOURCES

Section 3.6 of the 2017 Final MND described and analyzed impacts of the approved project related to geology, soils, and mineral resources (CPUC 2017: Final MND pages 3.6-1 to 3.6-18). That discussion is hereby incorporated by reference.

The proposed access road would not require any earthmoving activities and would not result in the loss of topsoil or increase erosion. The access road would not result in a new impact or increase the severity of a previously analyzed impact on geology and soils.

3.7 GREENHOUSE GAS EMISSIONS

Section 3.7 of the 2017 Final MND described and analyzed impacts of the approved project related to greenhouse gas (GHG) emissions relevant to the project (CPUC 2017: Final MND pages 3.7-1 to 3.7-2). That discussion is hereby incorporated by reference.

The proposed change in the location of the access road to Staging Area LZ-3 would not result in an increase in the level of equipment use or run time of equipment and would be consistent with the estimates provided in the Final MND. APM AIR-2 and APM GHG- 2 would ensure that any impacts from emissions would remain less than significant. The new access route would not result in a new impact or increase the severity of a previously analyzed impact on GHG emissions.

3.8 HAZARDS AND HAZARDOUS MATERIALS

Section 3.8 of the 2017 Final MND described and analyzed impacts of the approved project related to hazardous materials and physical hazards in and around the project site (CPUC 2017: Final MND pages 3.8-1 to 3.8-12). That discussion is hereby incorporated by reference.

Hazardous materials (such as fuels and oils) may be transported across the proposed access route to the staging area and would be consistent with the types of materials analyzed in the 2017 Final MND. The proposed access road does not contain any known hazardous material sites. The route is bordered by non-native grassland, which could pose a fire risk; however, this risk is consistent with other work areas in the vicinity and throughout the project that are near or in grasslands. PG&E would implement the Fire Prevention Plan prepared for the project as well as additional fire safety practices to prevent wildland fires. APM HM-3, APM HM-4, MM Hazards-1, and MM Hazards-2 would ensure that impacts from hazards and hazardous materials continue to be less than significant with mitigation. The proposed access road would not result

in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

3.9 HYDROLOGY AND WATER QUALITY

Section 3.9 of the 2017 Final MND described and analyzed impacts of the approved project related to hydrology and water quality in and around the project site (CPUC 2017: Final MND pages 3.9-1 to 3.9-17). That discussion is hereby incorporated by reference.

The proposed access road crosses two water features that flow through existing culverts. Implementation of MM Hydrology-1 and MM Hydrology-2 would ensure that a Stormwater Pollution and Prevention Plan is prepared and implemented, and any impacts to water quality would remain less than significant with mitigation. The proposed road would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

3.10 LAND USE

Section 3.10 of the 2017 Final MND described and analyzed impacts of the approved project related to land use in and around the project site (CPUC 2017: Final MND pages 3.10-1 to 3.10-11). That discussion is hereby incorporated by reference.

The proposed access road is located on private property and would not result in a new impact or increase the severity of a previously analyzed impact on land use and planning.

3.11 NOISE

Section 3.11 of the 2017 Final MND described and analyzed impacts of the approved project related to noise in and around the project site (CPUC 2017: Final MND pages 3.11-1 to 3.11-19). That discussion is hereby incorporated by reference.

Activities associated with access road use area are the same as those discussed in the 2017 Final MND; this minor proposal simply shifts the location of any noise associated with use of the road to the revised access route. Although there are sensitive receptors within 500 feet of the new route, these sensitive receptors are located on Faught Road, an existing public road, and the noise levels will be the same as described in the Final MND. As with the existing route, PG&E will implement MM Noise-1 on the revised route and, thus, the proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on noise.

3.12 PALEONTOLOGICAL RESOURCES

Section 3.12 of the 2017 Final MND described and analyzed impacts of the approved project related to paleontological resources (CPUC 2017: Final MND pages 3.12-1 to 3.12-6). That discussion is hereby incorporated by reference.

No grading, new excavations, or digging would be performed along the access road. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on paleontological resources.

3.13 POPULATION AND HOUSING

Section 3.13 of the 2017 Final MND described and analyzed impacts of the approved project related to population and housing in and around the project site (CPUC 2017: Final MND pages 3.13-1 to 3.13-3). That discussion is hereby incorporated by reference.

The proposed access road would not result in any impacts to population and housing and would be consistent with the analysis of the 2017 Final MND. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on population and housing.

3.14 RECREATION

Section 3.14 of the 2017 Final MND described and analyzed impacts of the approved project related to recreation in and around the project site (CPUC 2017: Final MND pages 3.14-1 to 3.14-2). That discussion is hereby incorporated by reference.

The proposed access road is located on private land and would therefore have no impact on recreational facilities or parks. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on recreation.

3.15 TRAFFIC AND TRANSPORTATION

Section 3.15 of the 2017 Final MND described and analyzed impacts of the approved project related to traffic and transportation in and around the project site (CPUC 2017: Final MND pages 3.15-1 to 3.15-27). That discussion is hereby incorporated by reference.

The proposed access road would replace use on an approved access road to address community concerns related to the use of Shiloh Ridge Road. Use of the proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

3.16 UTILITIES AND PUBLIC SERVICES

Section 3.16 of the 2017 Final MND described and analyzed impacts of the approved project related to utilities and public services in and around the project site (CPUC 2017: Final MND pages 3.16-1 to 3.16-13). That discussion is hereby incorporated by reference.

The proposed access route would not include the construction of new, or expand existing, water facilities, stormwater drainage facilities, or require additional water entitlements or creation of new solid waste disposal needs.

3.17 MANDATORY FINDINGS OF SIGNIFICANCE

3.17.1 IMPACT ANALYSIS

The “Impact Analysis” discussion in Section 3.17.1 of the 2017 Final MND addressed the mandatory findings of significance that would occur during construction, operation, and

maintenance of the proposed project (CPUC 2017: Final MND pages 3.17-1 to 3.17-32). That discussion is hereby incorporated by reference.

Impact MFOS-1: Would the proposed project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? *No change*

Potential impacts to the environment, fish and wildlife habitat, fish and wildlife populations, plant and animal communities, endangered, rare, or threatened species, and examples of the major periods of California history or prehistory would be the same as the existing project. PG&E would implement the same APMs and MMs as for the existing project. The change in access routes would have no impact on these issues and impacts would remain less than significant with mitigation.

Impact MFOS-2: Would the proposed project have impacts that are individually limited, but cumulatively considerable? “Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. *No change*

The cumulative project list in the 2017 Final MND remains current and applicable to the project area. The potential impacts from construction and operation of the proposed project modifications with regard to aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, noise, paleontological resources, traffic and transportation, utilities, and public services would be similar to or reduced relative to the existing project. PG&E would implement the same APMs and MMs as for the existing project. As is the case for the existing project, impacts from construction and operation of the proposed modifications would not have a considerable contribution to a significant cumulative impact.

Impact MFOS-3: Would the proposed project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? *No change*

As discussed in the sections above, construction and operation of the proposed project modifications would occur contiguous to the existing project study area and would not change the type or severity of impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation, or utilities and service systems as the existing project analyzed in the 2017 Final MND. Impacts to air quality, water quality, and hazardous materials by the use of the proposed access road could directly affect human beings, and all CEQA impacts discussed above could indirectly affect human beings. However, implementation of APMs and MMs and compliance with applicable federal, state, and local regulations as discussed in the 2017 Final MND and in this Supp. PEA would reduce these impacts to a less-than-significant level. This Supp. PEA has identified no other direct or indirect adverse effects on human beings.

3.17.2 CONCLUSIONS

The proposed modifications to the Fulton-Fitch Mountain Reconductoring Project would not result in new significant impacts or substantially increase the severity of previously identified

impacts on the environment. No new mitigation measures are required to ensure that impacts will remain less than significant. Therefore, no new information of substantial importance has been identified, and none of the conditions described in PRC Sections 15162 and 15163 that call for preparation of a subsequent negative declaration are present.

4.0 REFERENCES

- California Public Utilities Commission (CPUC). 2017. *Fulton-Fitch Mountain Reconductoring Project Final Initial Study/Mitigated Negative Declaration State Clearinghouse No. 2017072049*. Prepared by Panorama Environmental, San Francisco, California.
- Garcia and Associates (GANDA). 2018. *Addendum to March 2018 Bat Roosting Habitat Assessment for the Fulton-Fitch Mountain Reconductoring Project*. Unpublished report prepared for TRC Solutions, Mountain View, California. May 22, 2018.
- Stantec. 2018a. *Fulton-Fitch Mountain Reconductoring Project: Vegetation Survey at the New Access Road to Landing Zone 3*. Unpublished report prepared for Pacific Gas & Electric Company, San Francisco, California. May 4, 2018.
- _____. 2018b. *A Cultural Resources Pedestrian Inventory and Evaluation Report of 0.29 Acres for Pacific Gas & Electric Company's Proposed MPR-02 for the Fulton-Fitch Mountain Reconductoring Project*. Unpublished report prepared for Pacific Gas & Electric Company, San Francisco, California. August 1, 2018.