

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 25, 2014

Ms. Cristina Holstine
Pacific Gas and Electric Company
Land Planner, Technical and Land Services
245 Market Street, Room 1054A
San Francisco, CA 94105-1702

Subject: Crazy Horse Canyon Switching Station Project—Review of Minor Project Modification #12

Dear Ms. Holstine:

The California Public Utilities Commission (CPUC) has reviewed Pacific Gas and Electric Company's (PG&E's) proposed grading, slope stabilization, and drainage modifications submitted on July 17 for the approved Crazy Horse Canyon Switching Station Project (project). On July 21, CPUC informed PG&E a Minor Project Modification (MPM) was required for the proposed changes as described in the project Mitigation Monitoring, Reporting, and Compliance Program (MMCRP). No formal MPM request was submitted. This letter was prepared using a detailed description of the proposed actions and construction plans provided by PG&E on July 17 and 22 (attached).

CPUC has determined that the proposed actions would be consistent with the approved Final Initial Study/Mitigated Negative Declaration (IS/MND) developed for the project and would not result in new significant impacts, or significantly greater impacts than those analyzed in the IS/MND. A description of the proposed actions and review findings are presented in this letter.

Proposed Action

#1) *Modification of the Engineered Slope and Drainage System*

PG&E proposes to modify the engineered slopes and drainage system surrounding the switching station to the north and south, and along the paved access road from San Juan Grade Road to the east and west, in order to better stabilize the slopes from erosion. The following modifications are proposed by slope location (see attached construction drawing):

Northerly Slopes (Upper "Cut Slopes")

- Existing rills would be filled in with ¾ inch gravel.
- Multiple locations would be benched (excess soil removed and flattened)
- Rip-rap (rock) would be stacked over geofabric at multiple locations.

Southerly Slopes (Lower "Fill Slopes")

- The majority of slopes would be graded to trim approximately 6 to 12 inches of excess topsoil and compacted soil, and to maintain a 2:1 slope.
- Install a K-rail and hay bale wall along the toe of the slope to act as a runoff filtration barrier. The K-rails would be removed after two to three years, once the slopes were secure and well established with vegetation.

Paved Access Road Slopes

- Along the east side of the access road, a 4- by 4- by 5-foot catch basin would be placed in the V-ditch along the shoulder, and a 12-inch corrugated metal drain pipe would be placed under the road at a 2 percent slope.
- Rip-rap would be installed immediately south of the access road entrance.

PG&E anticipates that a total of approximately 6,070 cubic yards of soil would be removed from the engineered slopes covering an approximately 250,000-square-foot area. Removed soil would be transported offsite to a landfill or other appropriate facility. Approximately 210 cubic yards of crushed rock would be used to fill in rills on the upper slope.

PG&E proposes to begin grading on July 28, 2014. Work is expected to continue for approximately two months.

Analysis

The MPM request was reviewed to determine whether the proposed action would result in a new significant environmental effect or would substantially increase the severity of a previously identified significant environmental effect.

Aesthetics

Less than significant impact. Visual impacts were evaluated in the IS/MND for construction of the switching station, including grading and associated facilities. A temporary K-rail and hay bale wall would be installed for two to three years along the toe of the lower slope. The proposed changes would not be significantly different from other grading, drainage facilities, or stabilization methods that were previously evaluated in the IS/MND. Slopes would not be elevated to more visible heights. The proposed slope and drainage modifications would not have a significantly greater visual impact to the site or contrast from the surrounding landscape than previously evaluated in the IS/MND.

Agriculture and Forestry Resources

Less than significant impact. The entire project area is located on land subject to a Williamson Act contract. In addition, the entire project area is located on land classified by the California Department of Conservation's Farmland Mapping and Monitoring Program as Grazing Land. The evaluation of agricultural impacts presented in the IS/MND states that the project would result in the conversion of 25 acres of grazing land, of which 13.7 acres would be returned to grazing use following construction. A permanent 12.2-acre conversion was evaluate for the

switching station and conductor support facilities, which represents a cumulative loss of 0.0009 percent of available grazing land in the County. The proposed slope modifications are located in areas that were previously graded for the project, which were previously approved for disturbance in the IS/MND; therefore, the proposed changes would not be significant.

Air Quality and Greenhouse Gases

Less than significant impact. The proposed action would require the additional use of grading equipment, involve dust generated from earth disturbance, and involve additional vehicle trips to deliver equipment and gravel, and off-haul excess soil. Approximately 250,000 square feet of previously disturbed soil would be re-disturbed, and approximately 6,070 cubic yards of soil would be removed from the site. Similar grading equipment as evaluated in the IS/MND would operate for approximately two months. Off-hauling soil would require approximately 388 truck trips (13 trips per day for a 30-day schedule). The level of equipment use and number of vehicle trips would not exceed the peak level of activity considered in the IS/MND; therefore, the proposed actions would not create greater impacts to air quality than previously evaluated in the IS/MND. PG&E would implement all air quality applicant proposed measures and mitigation measures as required by the IS/MND.

Biological Resources

Less than significant impact.

Special-status plants. The proposed work areas were previously surveyed for special-status plants during pre-construction surveys. No special status plants were identified; therefore, the proposed action would not impact special-status plants.

Special-status wildlife. The proposed actions have the potential to affect special-status wildlife species such as California red-legged frog (CRLF), California tiger salamander (CTS), and coast range newt. Impacts to these species were evaluated in the IS/MND, and incidental take was authorized by the United States Fish and Wildlife Service (USFWS) through the Biological Opinion (BO) and by the California Department of Fish and Wildlife (CDFW) through the Incidental Take Permit (ITP). The proposed activities would not have a greater chance of impacting special-status species than construction activities evaluated in the IS/MND. In addition, the proposed activities would all occur within amphibian exclusion fencing surrounding the project site. PG&E would implement all applicable protection measures outlined in the IS/MND, BO, and ITP to ensure impacts to special-status species would remain less than significant.

On July 23, PG&E consulted CDFW regarding new installation of rip-rap and geofabric at locations that were previously proposed to be revegetated. CDFW determined that the compensatory mitigation values described in the ITP for the conversion of upland CTS habitat may need to be amended based on a change in the classification of these locations from temporary to permanent disturbance. Compensatory mitigation values were calculated using separate ratios for temporary and permanent disturbance. PG&E will amend compensatory

mitigation values in the ITP as required by CDFW to comply with Sections 2081(b) and (c) of the California Endangered Species Act.

Cultural Resources

No additional impact. All of the proposed work areas were previously surveyed for cultural resources. No resources were identified and the areas were previously graded for the project. The proposed actions would have no impact to cultural resources.

Geology, Soils, and Seismicity

No additional impact. The purpose of the proposed actions would be to increase soil stability on site and to prevent erosion. As described previously, an approximately 250,000-square-foot-area would be re-disturbed, and approximately 6,070 cubic yards of soil would be removed from the site. All disturbed slopes would receive hydroseed and bonded fiber matrix¹, as well as straw wattles placed horizontally across the slopes in 10-foot intervals. A temporary irrigation system would be installed to water grass seed that will applied to all disturbed project areas following the proposed grading work. Irrigation is expected to being in mid- to late-September and would occur as needed to establish plant growth in order to stabilize disturbed soil.

Hazards and Hazardous Materials

Less than significant impact. The proposed actions would not include greater use of hazardous materials than other construction activities evaluated in the IS/MND. Typical hazardous materials would be used such as oils, lubricants, and gasoline. Implementation of applicable spill prevention and cleanup measures would ensure potential impacts from the use of these materials would be consistent with those analyzed in the IS/MND.

Hydrology and Water Quality

Less than significant impact. The purpose of the proposed actions would be to increase soil stability on site and to prevent sediment transport into adjacent water features. The proposed slope modifications are necessary to prevent potential impacts to hydrology and water quality. Additional grading would occur adjacent to jurisdictional water features located on site (e.g., intermittent drainages and seasonal wetlands). Construction within and adjacent to jurisdictional water features was evaluated in the IS/MND and found to be less than significant with mitigation. Impacts to jurisdictional features were permitted through the Regional Water Quality Control Board, Central Coast Region 401 Permit, the United States Army Corps of Engineers 404 Permit, and CDFW 1602 Permit. The proposed actions would not involve new or greater impacts to hydrology or water quality than those analyzed in the IS/MND.

Land Use and Planning

¹ Bonded fiber matrix is a hydraulically applied mulch that eliminates the impact of direct rain drops on soil, has a high water-holding capacity, and biodegrades into materials that are beneficial to plant growth.

No additional impact. The proposed work areas are within the 25-acre parcel of land purchased by PG&E for the project. The proposed action would have no additional impact on land use and planning.

Mineral Resources

No additional impact. There are no known important mineral resources in the work area, as described in the IS/MND. The proposed action would therefore have no impact on mineral resources.

Noise

Less than significant impact. The proposed actions would generate noise from construction traffic and grading equipment; however, the noise levels would not be greater than those evaluated for previous grading addressed in the IS/MND. Therefore, the proposed actions would not result in greater noise impacts than those analyzed in the IS/MND.

Population and Housing

No additional impact. The proposed actions would have no impacts to population and housing.

Public Services

No additional impact. The proposed actions would have no impact on public services.

Recreation

No additional impact. The proposed actions would have no impact to recreation.

Transportation and Traffic

Less than significant impact. The proposed actions would involve increased levels of construction traffic for approximately two months. Off-hauling soil would require approximately 388 truck trips (13 trips per day for a 30-day schedule), and additional workers, equipment, and materials would be transported to and from the site. Peak construction for the project was described as 80 trips per day in the IS/MND and considered to be less than significant. The proposed actions would not increase construction traffic to greater than 80 trips per day; therefore, the proposed actions would not result in greater impacts to transportation and traffic than previously analyzed in the IS/MND.

Utilities and Service Systems

No additional impact. The proposed actions would have no impact on utilities and service systems.

Conclusion

Implementation of the proposed actions described in this letter would not result in new or significantly greater impacts to the environment, and do not present new substantial

Ms. Cristina Holstine

July 28, 2014

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information that would change the findings presented in the IS/MND. The MPM is consistent with the analysis presented in the IS/MND and additional CEQA review is not required.

Please contact me or Susanne Heim at Panorama Environmental, Inc. if you have any questions.

Sincerely,



Mary Jo Borak,

CPUC CEQA Supervisor

cc: Susanne Heim, Panorama Environmental, Inc.
Aaron Lui, Panorama Environmental, Inc.
Janet Liver, TRC

Attachments:

Attachment 1 PG&E Revised Slope Stabilization Plan (Construction Drawing)
Attachment 2 Correspondence with PG&E and TRC RE Slope Changes

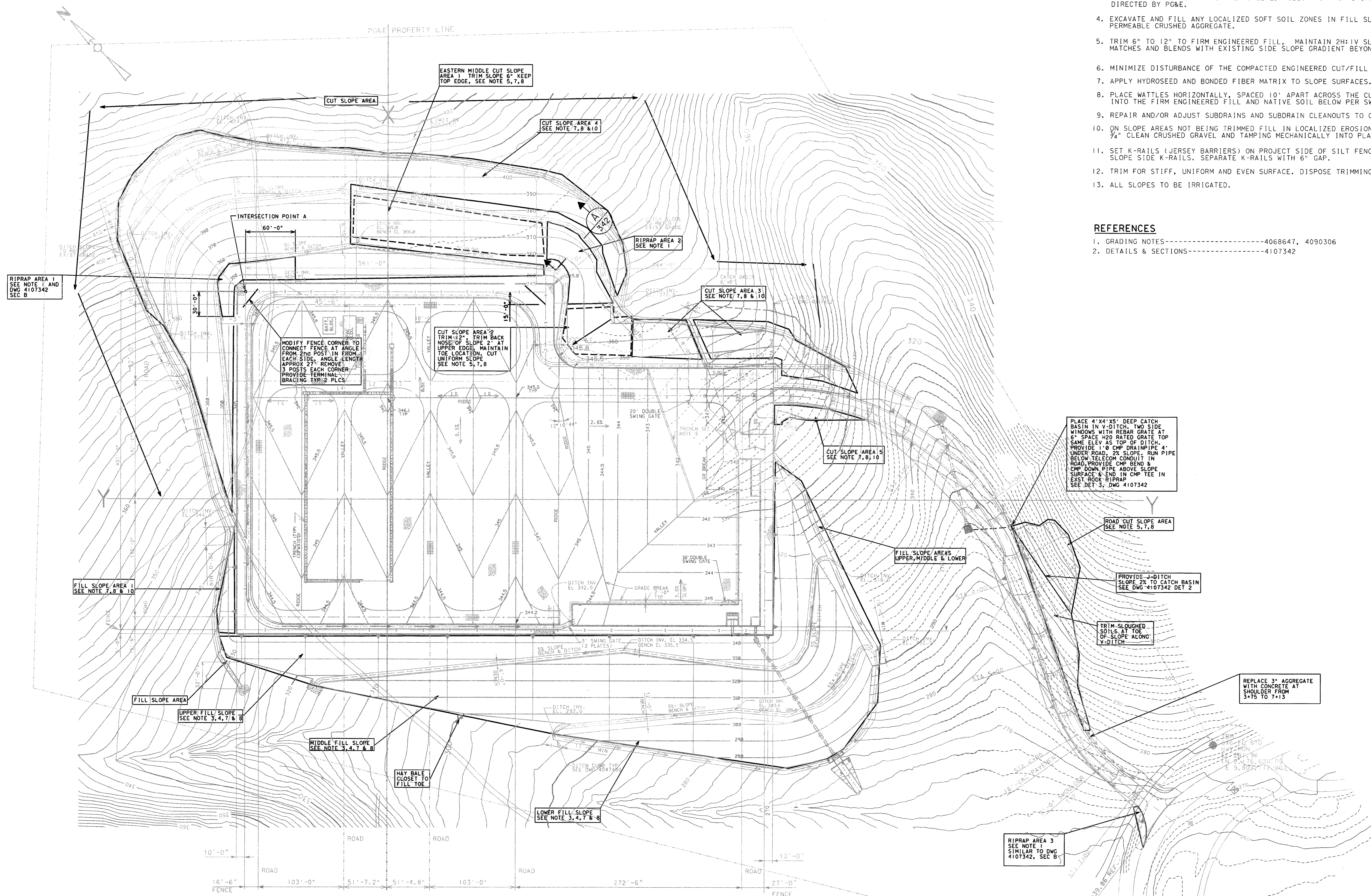
Attachments

CONSTRUCTION NOTES

- EXCAVATE AND PROVIDE BENCHES AS IDENTIFIED AND AS INSTRUCTED BY ENGINEERING GEOLOGIST. PLACE GEOPAPRIC ON BENCHED BACKCUT SLOPE. THE FABRIC SHALL BE PLACED IN CONFORMANCE WITH THE MANUFACTURER'S INSTRUCTIONS AND THE REQUIREMENTS OF THE 2010 CALTRANS STANDARD SPECIFICATIONS (CALTRANS SPECIFICATIONS) SECTION 7-1.03. MIRAFI 180N OR EQUIVALENT SHALL BE USED FOR THE GEOPAPRIC PROVIDED IT MEETS OR EXCEEDS CLASS B FABRIC PER CALTRANS SPECIFICATION SECTION 8B-1.021. PLACE SUBDRAIN AND CALTRANS CL 2 PERMEABLE MATERIAL. BACKFILL WITH STACKED RIP RAP SO THAT THE FINAL SLOPE GRADIENT MATCHES AND BLENDS WITH THE EXISTING SIDE SLOPE GRADIENT BEYOND THE REPAIR ON EITHER SIDE. THE OVERALL SLOPE GRADIENT OF THE BACK CUT SLOPE SHALL NOT BE STEEPER THAN 1H:1V. THE RIP RAP SHALL BE PLACED ACCORDING TO CALTRANS SPECIFICATIONS SECTION 72-2.03C. THE RIP RAP SHALL MEET REQUIREMENTS OF CALTRANS SPECIFICATIONS SECTION 72-2.02A AND SHALL CONSIST OF NO. 2 ROCK SLOPE PROTECTION. THE RIP RAP MATERIAL SHALL BE CLOSELY FRACTURED AND SHALL NOT CONTAIN ORGANICS, SOLUBLE MATERIAL AND/OR CORROSIVE MINERALS.
- NOT USED
- FILL SLOPE UPPER, MIDDLE AND LOWER AREAS. TRIM THE SLOPES 6" TO 12" MAINTAINING THE 2H:1V SLOPE STARTING FROM THE TOP. TRIM TO FIRM ENGINEERED FILL. TRIM FOR STIFF, UNIFORM AND EVEN SURFACE. DISPOSE TRIMMINGS AS DIRECTED BY PG&E.
- EXCAVATE AND FILL ANY LOCALIZED SOFT SOIL ZONES IN FILL SLOPE AREAS PRESENT AFTER TRIMMING WITH 3/4" PERMEABLE CRUSHED AGGREGATE.
- TRIM 6" TO 12" TO FIRM ENGINEERED FILL. MAINTAIN 2H:1V SLOPE FACE MAX. TRIM SO FINAL SLOPE GRADIENT MATCHES AND BLENDS WITH EXISTING SIDE SLOPE GRADIENT BEYOND REPAIR ON EITHER SIDE.
- MINIMIZE DISTURBANCE OF THE COMPACTED ENGINEERED CUT/FILL SURFACES TO AVOID LOOSENING FILL.
- PLACE WATTLE HORIZONTALLY, SPACED 10' APART ACROSS THE CUT SLOPES AND 5' APART ON FILL SLOPES. ANCHOR INTO THE FIRM ENGINEERED FILL AND NATIVE SOIL BELOW PER SWPP PLAN.
- REPAIR AND/OR ADJUST SUBDRAINS AND SUBDRAIN CLEANOUTS TO CONNECT AND DRAIN TO V-DITCHES.
- ON SLOPE AREAS NOT BEING TRIMMED FILL IN LOCALIZED EROSION RILLS BY WETTING SOIL THEN BACKFILLING WITH 3/4" CLEAN CRUSHED GRAVEL AND TAMPING MECHANICALLY INTO PLACE.
- SET K-RAILS (JERSEY BARRIERS) ON PROJECT SIDE OF SILT FENCE ALONG FILL SLOPE TOE. PLACE HAYBALES ON SLOPE SIDE K-RAILS. SEPARATE K-RAILS WITH 6" GAP.
- TRIM FOR STIFF, UNIFORM AND EVEN SURFACE. DISPOSE TRIMMINGS AS DIRECTED BY PG&E.
- ALL SLOPES TO BE IRRIGATED.

REFERENCES

- GRADING NOTES-----4068647, 4090306
- DETAILS & SECTIONS-----4107342



PLAN
1"=60'

FOR QUESTIONS ON REV 1 OF THIS DWG
CALL STEVE GALLO AT 823-388-5015
CALL J. CHENG AT J.CHENG

RECORD INDEX	
BUSINESS LINE:	SUBSTATION & TRANSMISSION
STATUS:	ACTIVE
FACILITY NAME:	CRAZY HORSE CANYON SWITCHING STA
FACILITY COMPONENT:	GRADING
FACILITY TYPE:	SUBSTATION
UNIT:	13501
DRAWING TYPE:	SUBSTATION
DISCIPLINE:	CIVIL

REV	DATE	DESCRIPTION	JOB NO	USG/DWG	CHKD	SUPV	APVD	REV	DATE	DESCRIPTION	JOB NO	USG/DWG	CHKD	SUPV	APVD
1	7-10-14	ISSUED FOR PERMIT & CONSTRUCTION	30983404	JC	SAC	SAC	SAC	1	7-10-14	ISSUED FOR PERMIT & CONSTRUCTION	30983404	JC	SAC	SAC	SAC

W.O. 30983404 | REV. 1
 DSG J. CHENG
 DWN J. CHENG
 CHKD J. CHENG
 SUPV J. CHENG
 APVD J. CHENG
 DATE 7-10-14

CIVIL
 SITE IMPROVEMENT
 CRAZY HORSE CANYON SWITCHING STATION
 DEPARTMENT OF ENGINEERING
 PACIFIC GAS AND ELECTRIC COMPANY
 SAN FRANCISCO, CALIFORNIA



APPLIES TO REV 1 ONLY

SCAN	IC
BILL OF MATL	
DWG LIST	072632
SUPDS	
SUPSD BY	
SHEET NO	4107341
SHEETS	1

From: [Liver, Janet](#)
To: [Aaron Lui](#); [Susanne Heim](#)
Cc: [Holstine, Cristina](#); [Cooney, Kathleen](#)
Subject: RE: Crazy Horse Slope Stabilization Plan
Date: Tuesday, July 22, 2014 11:14:48 PM
Attachments: [SureTrak_CHC SLOPE REMEDIATION.PDF](#)

Susanne/Aaron,

Attached is a schedule for the work, with critical tasks in red. Commencing on July 28, it is anticipated these critical tasks would be completed by October 15.


Regarding the irrigation system, it would be installed in mid- to late-September. The hydroseed and BFM would be applied in late September and then irrigated.

The conservative estimate of approximately 6,070 cubic yards of soil to be removed equates to 388 truck trips. The contractor hauling the soil intends to bring it to their property in Hollister, approximately 21 miles if driven via San Juan Grade Road and SR 156 (26 miles via Highway 101). Soil can be stockpiled within the yard should it be necessary to reduce the number of daily truck trips. The estimated total number of days required for trimming of the slopes (as identified in the schedule) is 30 days, which would equate to an average of 13 truck trips per day. Table 3.16-3 of the FMND identifies estimated maximum daily construction traffic for the project at 80 trips, including 15 aggregate delivery trucks. Based on existing and estimated peak-hour traffic conditions on project roadways (table 3.16-4), it was concluded in the FMND that the increase in peak-hour traffic volume due to construction would not be discernible from typical daily fluctuations in traffic flow. Therefore, the truck trips to remove slope trimmings from the site will likewise not result in a discernable increase in peak-hour traffic volume.

I believe it was mentioned on Monday that Monterey County has issued a grading permit for trimming the slopes (it is being picked up July 23). I don't know if this was conveyed to you, but the reason a new permit had to be issued is that the prior permit had been closed out and once a permit is closed, it can't be re-opened. If the permit hadn't been closed, no additional approval would have been required; the change in the amount of grading would simply have been noted in the file and on the as-graded plan prior to final inspection. So for everyone's convenience, the County said they would use the existing permit information to "clone" a new permit. They actually approved the permit within 24 hours of receipt of the application. I know the previous grading permit was submitted for CPUC records, and this one will be too.

Janet

TRC Companies, Inc.
101 2nd Street, Suite 300
San Francisco, CA 94105



From: Holstine, Cristina [REDACTED]
Sent: Thursday, July 17, 2014 4:04 PM
To: Lisa Orsaba [REDACTED]
Cc: 'Aaron Lui'; 'Susanne Heim'; Liver, Janet; Cooney, Kathleen
Subject: Crazy Horse Slope Stabilization Plan

On April 10, 2014, PG&E submitted a slope stabilization proposal to the California Public Utilities Commission (CPUC), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB) to respond to the corrective action requirements of the CPUC, CDFW, and RWQCB following a sediment discharge from the Crazy Horse Canyon Switching Station Project into two seasonal wetlands and an intermittent drainage downslope of the construction site in February 2014. The letter proposed monitoring and reporting to be performed by Pacific Gas and Electric Company (PG&E) during long-term stabilization of the site.
Hello Lisa

On April 10, 2014, PG&E submitted a slope stabilization proposal to the California Public Utilities Commission (CPUC), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB) to respond to the corrective action requirements of the CPUC, CDFW, and RWQCB following a sediment discharge from the Crazy Horse Canyon Switching Station Project into two seasonal wetlands and an intermittent drainage downslope of the construction site in February 2014. The letter proposed monitoring and reporting to be performed by Pacific Gas and Electric Company (PG&E) during long-term stabilization of the site.

The long-term measures proposed by PG&E in April included topsoil redistribution and re-seeding to be implemented after there is no rain in the extended forecast so as to avoid removing the short-term measures while there is still a chance of rain, thereby risking exposure of the slopes to further erosion. It has since been determined that if the topsoil were redistributed, the loose soil on top of the compacted, engineered slope would not be sufficient to stabilize the site and prevent further erosion.

PG&E is proposing modifications to the slope stabilization proposal presented in April with the goals of stabilization and revegetation of the slopes prior to the next significant rain events, and protection of the seasonal drainage and wetlands at the bottom of the slope.

The project site is situated such that the more northerly slopes are cut slopes and the southerly slopes are fill slopes. PG&E is proposing slightly different treatments to stabilize these different slopes. The majority of the cut slopes will have erosion rills filled in with clean gravel. The fill slopes will be graded to trim 6 to 12 inches of soil and maintain a 2:1 slope rather than have the rills filled. There are two smaller areas on the cut slopes that will be benched, have geofabric installed, and rip rap placed over the fabric.

Along the east side of the access road, a 4- by 4- by 5-foot catch basin will be placed in the V-ditch, and a 12-inch CMP drain pipe will be placed under the road at a 2 percent slope.

It is anticipated that approximately 6,070 cubic yards of soil will be removed from trimming the graded slopes over the approximately 250,000-square-foot area covered by the original grading permit. The topsoil will be hauled off-site and will likely be hauled to a third party or taken to a landfill. The fill amount will be approximately 210 cubic yards of crushed rock to fill in the rills.


All disturbed slopes will receive hydroseed and bonded fiber matrix, as well as straw wattles placed

horizontally across the slopes in 10-foot intervals. Bonded fiber matrix is a hydraulically applied mulch that eliminates the impact of direct rain drops on soil, has a high water-holding capacity, and biodegrades into materials that are beneficial to plant growth.

PG&E has submitted a grading permit to Monterey County and will proceed with the slope stabilization work upon receipt of the permit, which is anticipated this week or early next week. The duration of the slope stabilization work will be approximately two months. In mid-September, the wattle will be installed, and the hydroseed and bonded fiber matrix will be applied. The expected duration of this work is three to four days, and may not be done consecutively. Temporary irrigation will be installed in mid- to late-September and watering will occur as needed to establish plant growth.

The revised slope stabilization plan is attached. Please don't hesitate to call if you have any questions.

Cristina S. Holstine
Senior Land Planner
Pacific Gas & Electric Company
245 Market St., Rm. 1054A
Mail Code N10A
San Francisco, CA 94105



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To learn more, please visit <http://www.pge.com/about/company/privacy/customer/>
