STATE OF CALIFORNIA
Governor

Edmund G. Brown Jr.,

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

October 22, 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 #13

Dear Ms. Holstine,

The California Public Utilities Commission (CPUC) has reviewed Pacific Gas and Electric Company's (PG&E's) request for Minor Project Modification (MPM) #13 for the Crazy Horse Canyon Switching Station Project (project), provided in Attachment A. 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 pursuant to the California Environmental Quality Act (CEQA) 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) Reconductor the Moss Landing Salinas-Soledad Nos. l and 2 115-kV Power Lines between Tower 10/50 and 10/51

PG&E proposes to reconfigure the Moss Landing Salinas-Soledad Nos. l and 2 115-kV Power Lines between existing Tower 10/50 and new Tower 10/51. The action involves installing new conductor between existing Tower 10/50 and new Tower 10/51 across Crazy Horse Canyon Road. Installation of the conductor would require the use of approximately 0.9 acre of additional temporary workspace for two temporary pull-and-tension sites (PTSs) and guard structures. The towers, power line segment, and workspaces are shown on Figure 1 in Attachment A.

Temporary PTSs located at Tower 10/50 and to the east of Tower 10/51 would be used to string new conductor for the power line segments. The work areas would be approximately 0.5 acre and 0.3 acre, respectively. The PTSs would be cleared of vegetation prior to use. At a minimum, PG&E anticipates trimming five trees at the Tower 10/50 PTS, and if needed, PG&E may remove the trees completely. The Tower 10/50 PTS would be accessed via an existing two-track road (approximately 8 to 10 feet wide and 1,300 feet long) from an existing gate along Crazy Horse

Canyon Road. The access road is shown on Figure 1. PG&E does not propose any additional grading associated with the MPM.

Temporary guard structures would be erected on either side of Crazy Horse Canyon Road directly beneath the current and future position of the power lines. The guard structures would consist of three wooden poles installed on either side of the road connected by a cargo netting spanning the road. Each set of poles would be anchored to the ground with support wires to the north and south. The guard structure truck workspace, pole, and support locations are shown on Figure 2 in Attachment A. The guard structures would be installed from Crazy Horse Canyon Road and the road shoulder. PG&E would temporarily close the northbound and southbound lanes of Crazy Horse Canyon Road during installation and removal of the guard structures. Installation and removal of the guard structures would take approximately one day each. At a minimum, PG&E anticipates trimming two trees at the sites, and if needed, PG&E may remove the trees completely.

PG&E anticipates installing the new conductor sometime between November 2014 and February 2015. Conductor stringing is expected to take less than four weeks. The guard structures would be installed in approximately late October or early November 2014 and removed following conductoring stringing.

Purpose

The purpose of the MPM is to include reconductoring activities for the power line segments and the associated workspace needed to perform the work. The Moss Landing Salinas-Soledad Nos. l and 2 115-kV Power Lines were identified in PG&E's Proponents Environmental Assessment (PEA) for the project and addressed in the IS/MND project description. Conductor installation on new project structures and transferring the existing 115-kV lines from their existing position to Tower 10/51 were described in the IS/MND. Replacing the existing 115-kV conductor during the transfer process was not included in the proposed project. Following CPUC's approval of the proposed project, PG&E determined that the previous full tension splicing method to transfer the existing line to Tower 10/51 is not suitable because the method is no longer performed on older conductor like the segments between Towers 10/50 and 10/51. Transferring the lines requires that the conductor be replaced because the existing conductor is too old

The guard structures and netting would be installed to protect an existing distribution line and the public traveling on Crazy Horse Canyon Road. The use of guard structures during transfer of the power line was addressed in the IS/MND project description where the power lines pass over an existing 60-kV line; however, the proposed guard structures along Crazy Horse Canyon Road were not part of the proposed project addressed in the IS/MND.

#2) Relocate the helicopter landing zone to the Crazy Horse Switching Station pad

PG&E proposes to relocate the helicopter landing zone from the previously approved location at the 2-acre staging area north of the Lagunitas Switch (identified in the IS/MND, and modified in MPM #1) to the developed Crazy Horse Switching Station yard.

PG&E anticipates using the helicopter landing zone during conductor stringing sometime between November 2014 and February 2015. Helicopters are expected to be used up to a week or less during conductor stringing work, which is expected to take less than four weeks.

Purpose

PG&E proposes to relocate the landing zone in order to reduce the distance between the landing zone and helicopter work areas, as well as direct ground-based construction activities associated with helicopter work from undisturbed and unpaved areas to the paved access road and graveled switching station yard. Helicopter activities would primarily include conductor stringing. Relocating the landing zone has the potential to reduce environmental impacts from the project associated with temporary ground disturbance and air emissions because the landing zone would be relocated closer to the work area and to a gravel-covered area.

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. The proposed actions would include temporary visual impacts during construction and from the replacement of power line conductor. These impacts were evaluated for the project and found to be less than significant with mitigation. Mitigation requirements applicable to the proposed actions include the use of non-specular conductor (Applicant Proposed Measure [APM] Aesthetics-5) and limiting temporary visual construction impacts through appropriate staging and restoration (Mitigation Measure [MM] Aesthetics -6). The proposed actions would not change the aesthetic impact assessment presented in the IS/MND, provided that APM Aesthetics-5 and MM Aesthetics-6 are implemented.

Agriculture and Forestry Resources

Less than significant impact. The proposed actions would include the use of new temporary workspaces located in agricultural lands. The entire project area, including the pull-and-tension site east of the Lagunitas Switch, are located on land subject to a Williamson Act contract. The entire project area, including the proposed work areas east and west of Crazy Horse Canyon Road are located on land classified by the California Department of Conservation's Farmland Mapping and Monitoring Program as Grazing Land. Temporary impacts to agricultural lands were evaluated in the IS/MND and determined to be less than significant. The additional 0.9 acre of temporary work space would be returned to preconstruction uses following completion of the project. There would be no additional permanent impacts to agricultural land. Therefore, the proposed actions would not change the impact assessment for agriculture and forestry resources presented in the IS/MND.

Air Quality and Greenhouse Gases

Less than significant impact. Part #1 of the proposed actions would involve the additional use of vehicles and equipment, as well as temporary ground disturbance (approximately 0.9 acre). Conductor stringing would occur in approximately the same manner as described in the IS/MND project description. A wire puller, tensioner, bucket trucks, and a helicopter would be used to install the new conductor. Vehicles would access the work sites using existing unpaved roads, which would be watered as needed to prevent fugitive dust generation. Part #2 of the proposed actions would reduce ground disturbance, vehicle travel distances, and travel on unpaved roads by relocating the helicopter landing zone to the gravel covered switching station pad. 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 applicant proposed measure (APM) Air Quality-1 and APMs GHG-1, -2, and -3 as required by the IS/MND.

Biological Resources

Less than significant impact. The new work areas and adjacent vegetation associated with part #1 of the proposed actions were surveyed for special-status plants and wildlife by Biosearch Associates and Coast Range Biological on April 29, May 27, and July 3, 2014. The biological survey memos are provided in Attachment B. The work areas east of Crazy Horse Canyon Road (part #2 of the proposed actions) were previously surveyed during preparation of the IS/MND and prior to construction, as required by MM Biology-17, -21, -27, -28, -29, -31, -34, -35, and -36. In addition to PG&E surveys, On October 8, 2014, Panorama conducted a general reconnaissance-level biological review of the proposed work areas.

The proposed actions would involve approximately 0.9 acre of new ground disturbance and removing up to seven oak trees at temporary work areas. Two of the trees are located at the guard structure locations and the other five are located at the Tower 10/51 PTS. PG&E will attempt to trim the trees and avoid removing them to the extent feasible. If tree removal is required, PG&E would implement Mitigation Measures (MM) Biology-29 to reduce impacts to potential roosting bats, and replace each oak tree at a one-to-one ratio as required by MM Biology-40.

Special-status plants. No special-status plant species were identified in any of the work areas, as noted in the attached botanical survey memos.

Special-status wildlife. No special-status wildlife species were identified during the surveys; however; potential habitat was identified for coast range newt, white-tailed kite, loggerhead shrike, American badger, and multiple bat species. Potential habitat is also present for nesting birds. Project impacts to these species were addressed in the IS/MND, and would be mitigated with implementation of MMs Biology-27 and -36 (nesting birds), Biology-34 and -35 (coast range newt), Biology-31 (American badger), and Biology-29 (bats).

The proposed work areas are also located on marginal upland habitat for California red-legged frog (CRLF) and California tiger salamander (CTS), as described in the email correspondence between Biosearch, TRC, and California Department of Fish and Wildlife (CDFW) provided in Attachment B. Impacts to CRLF and CTS 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 CDFW through the Incidental Take Permit (ITP). The proposed activities would not have a greater chance of impacting these species than construction activities evaluated in the IS/MND; however, approximately 0.9 acre of additional upland habitat would be temporarily disturbed. PG&E consulted with CDFW regarding the proposed work areas west of Crazy Horse Canyon Road, and on August 12, 2014, CDFW issued Amendment #3 to the ITP, which included the proposed actions and associated work areas to the covered activities of the ITP. PG&E would implement all applicable protection measures for CRLF and CTS outlined in the IS/MND, BO, and ITP to ensure impacts to the species' remain less than significant. These requirements include, but are not limited to, the installation of amphibian exclusion fencing during the pull-and-tensioning work, as well as burrow excavations and regular biological clearances conducted by a USFWS/CDFW-approved biologist.

A total of approximately twelve woodrat nests were identified during the April 29, 2014, survey and during Panorama's review of the site on October 8, 2014. Seven of the nests are located on the ground or in tress within or adjacent to the proposed work areas. Three of the nests are located at west guard structures work area, two are within the Tower 10/50 PTS, and two are adjacent to the access road to Tower 10/50. The 2010 Biological Assessment prepared for the project by TRC included a determination that woodrats identified at the switching station site are the Diablo Range woodrat (*Neotoma fuscipes perplexa*), and not one of the two special-status subspecies of *Neotoma sp* in the region, San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) or Monterey dusky-footed woodrat (*Neotoma macrotis luciana)*. Additional research such as genetic testing would be required to ensure that the species present is the Diablo Range woodrat and not a special-status species. In order to prevent potential impacts to special-status woodrats, a qualified biologist would flag and avoid all woodrat nests located within or immediately adjacent to the proposed work areas.

PG&E is required to conduct additional preconstruction surveys as described in MM Biology-17, -21, -27, -28, -29, -31, -34, -35, and -36.

Biological impacts associated with the proposed actions would be consistent with those evaluated in the IS/MND.

Cultural Resources

No additional impact. The proposed work areas east of Crazy Horse Canyon Road were previously surveyed for cultural and historical resources during preparation of the IS/MND. Work areas west of Crazy Horse Canyon Road were surveyed by Garcia and Associates archeologists on April 28, 2014. A copy of the survey memo is included in Attachment C. No

cultural or historic resources were identified at the proposed work areas; therefore, the proposed actions would have no impact.

Geology, Soils, and Seismicity

Less than significant impact. The proposed actions would not involve grading or significant ground disturbance. Minor ground disturbance would occur at the proposed work areas during conductor stringing activities, and during the installation and removal of guard structures. Implementation of applicable erosion and sediment control best management practices (BMPs) identified in APMs Geology-1 and Hydrology-2, MMs Geology-5 and -6, the project Stormwater Pollution and Prevention Plan (SWPPP), and the project Erosion Control and Sediment Transport Plan (ECSTP) would ensure geologic, soil, and seismic impacts would be consistent with those analyzed in the IS/MND.

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 proposed actions would include 0.9 acre of additional temporary ground disturbance and travel on unpaved access roads adjacent to wetlands identified in the revised guard structure location and wetland review map provided in Attachment A (Figure 2), and the April 2014 Biosearch biological survey memo and 2014 National Wetland Inventory map provided in Attachment B. Potentially jurisdictional waters are located immediately adjacent to the guard structures on the east and west sides of Crazy Horse Canyon Road, as well as north of the access road to the Tower 10/50 PTS. No formal wetland delineation was completed; however, Coast Range Biological surveyed and sampled the work areas to identify the boundaries of potential waters of the U.S. and waters of the state ("swale") as shown in Figure 2 located in Attachment A.

To avoid impacts to potentially jurisdictional wetlands, PG&E would avoid the wetland boundaries entirely. PG&E would implement APMs Biology-4, -12, -14, -20, Geology-1 and -6, Hydrology-2, MM Geology-6, SWPPP, and ECSTP to prevent indirect impacts to wetland.

Land Use and Planning

No additional impact. The proposed work areas are located on two separate properties that are divided by Crazy Horse Canyon Road. The Monterey County land use and zoning category for both properties is Permanent Grazing, and both properties are being actively grazed. Impacts to land use and planning were evaluated in the IS/MND and determined to have no impact. PG&E has consulted with the landowner where the new work areas east of Crazy Horse Canyon Road

are located, and developed communication protocol to ensure that their cattle are not disrupted during the proposed work. The proposed actions would not impact land use or planning policies.

Mineral Resources

No additional impact. There are no known important mineral resources in the immediate vicinity of the project site, 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 the use of equipment and helicopters during conductor stringing. Part #1 of the proposed actions would involve additional helicopter activities between Towers 10/50 and 10/51. These poles are located at approximately the same distance or greater from sensitive receptors addressed in the IS/MND. Nearby sensitive receptors consist of the Lagunita School located approximately 3,500 from the site, and residences across from San Juan Grade Road located approximately 1,400 feet from the project. Part #2 of the proposed actions would involve relocating the helicopter landing zone approximately 2,000 feet south from its previously approved position to the switching station yard. Temporary construction noise, including the use of helicopters for line stringing, was evaluated in the IS/MND and determined to be less than significant. The proposed actions would not increase noise levels or conflict with Monterey County noise standards addressed in the IS/MND; however, relocating the landing zone would increase the duration of helicopter noise for residences located across San Juan Grade Road. The duration of helicopter work would be short (i.e., less than a week). Helicopter operation would occur between the hours of 7 a.m. and 5:30 p.m. Implementation of APMs Noise-1, -2, -3, and -4 would ensure that noise generated from the proposed activities would remain less than significant.

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 minor construction traffic from the additional use of a wire puller, tensioner, and bucket trucks for reconductoring and installation of the guard structures. During installation and removal of the guard structures, the north and southbound lanes of Crazy Horse Canyon Road would be closed. One lane would

always remain open. Installation and removal of the guard structures are expected to take approximately one day each. PG&E is in the process of securing a road encroachment permit from Monterey County. PG&E would conduct the lane closure in accordance with the County encroachment permit and any associated traffic control plan requirements. Flaggers will be used to control traffic. Lane closures would be scheduled to avoid peak commute times (i.e., between approximately 9 a.m. and 3 p.m.). Lane closures would cause minor traffic delays during non-peak commuting hours; however, these delays would be temporary, short in duration, and conducted in accordance to all County requirements. Therefore, the proposed actions would not result in greater transportation and traffic impacts than were 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 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,

Lisa Orsaba,

CPUC Project Manager

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

Attachments

A. MPM Request and Supporting Material
    1. MPM #13 Request
    2. Email Correspondence with TRC and Panorama RE Guard Structures
    3. Revised Guard Structure Location Map in Proximity to Potential Wetlands
    4. Photos from Crazy Horse Canyon Road
B. Biological Review Material
    1. Biosearch and Coast Range Plant and Animal Survey

2. Coast Range Plant Survey
3. Email Correspondence with CDFW, Biosearch, and PG&E RE CTS Habitat
4. Map of National Wetland Inventory Features Adjacent to MPM #13 Work Areas

C. Cultural Review Material

1. Garcia and Associates Culutural Survey Memo
2. Email Correspondence with Garcia and Associates and TRC RE Cultural Survey Area

Attachment A

Pacific Gas and Electric Company

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Ms. Lisa Orsaba
California Public Utilities Commission
Energy Division CEQA Unit
505 Van Ness Avenue
San Francisco, CA 94102

September 3, 2014

Re: **Crazy Horse Canyon Switching Station Project**
Request for Minor Project Modification #13 – Additional Pull Sites, Guard Structures, and Relocation of Helicopter Landing Zone to Switching Station Pad

Dear Lisa:

Pacific Gas and Electric Company (PG&E) is proposing minor project modifications to the Crazy Horse Canyon Switching Station Project. The modifications consist of a request to:

(1) add new temporary work areas associated with reconfiguring the Moss Landing-Salinas-Soledad Nos. 1 and 2 115 kV Power Lines between Tower 10/50 and 10/51 (two pull sites and workspace for guard structures), and
(2) relocate the helicopter landing zone to the graveled yard of the switching station pad.

Each project modification is described in detail below and depicted on the attached map (Figure 1). Also attached are the results of biological and cultural field surveys performed for the requested new work areas. A Biotic Assessment was performed by Biosearch Associates, a Special-status Plant Survey was performed by Coast Range Biological, and an addendum to the Cultural Resources Investigation for the Crazy Horse Canyon Switching Station Project was prepared by Garcia and Associates.

By way of this letter, PG&E respectfully requests approval of these minor project modifications. Please do not hesitate to contact me at 415-973-7406 should you require more information.

Sincerely,

Cristina Holstine
Senior Land Planner, PG&E

c.c.: Suzanne Heim, Panorama
Aaron Lui, Panorama
Janet Liver, TRC

(1) Additional Pull Sites; Guard Structures on Crazy Horse Canyon Road

As part of the associated power line reconfiguration through the Crazy Horse Canyon Switching Station, PG&E will need to install new conductor between existing Tower 10/50 and new Tower 10/51. An additional 0.9 acre of temporary workspace is needed to complete the conductor replacement between these towers. Figure 1 depicts the locations of requested work space.

Temporary guard structures will need to be erected on each side of Crazy Horse Canyon Road to support a net across the road for the safety of motorists on the road. These two new work areas will each be approximately 0.04 acre for a total area of 0.08 acre of temporary workspace along the edge of Crazy Horse Canyon Road. It is anticipated that two oak trees along the west side of the road may need to be removed. If possible, they will be trimmed instead of removed.

Pull sites are needed for pull and tension activities during conductor stringing. At the existing Tower 10/50 (on the west side of Crazy Horse Canyon Road), approximately 0.5 acre of work space will be required. To the east of Tower 10/51, approximately 0.3 acre of temporary work space will be required. No grading will occur; however, the area by Tower 10/50 will need to be cleared of vegetation and five oak trees may need to be removed. If possible, they will be trimmed instead of removed. An existing two-track access road off Crazy Horse Canyon Road will be used to access the Tower 10/50 work area.

The Incidental Take Permit issued for the project by the California Department of Fish and Wildlife was amended on August 18, 2014 to include these additional temporary work areas. It is anticipated that the conductor will be installed sometime between November 2014 and February 2015, with the temporary guard structures being installed in advance.

Justification:
It had been anticipated that the conductor between Towers 10/50 and 10/51 would be installed using a full tension splice; however, there is now concern about using this method on conductor that is no longer new in the very long span that crosses Crazy Horse Canyon Road. The only way to not have a full tension splice is to replace the conductor for this span, which requires a temporary guard structure across the road and a pull site at each end. An additional 0.9 acre of temporary workspace is required to complete the power line reconfiguration. With the additional 0.9 acre of temporary workspace, PG&E will still be using less temporary workspace than had been approved for the project due to workspace reductions achieved elsewhere.

RESOURCE EVALUATION	
CEQA Guidelines 15162 review: The proposed minor project modification is to add 0.9 acre of new workspace at Crazy Horse Canyon Road and Towers 10/50 and 10/51. It does not involve substantial changes to the Crazy Horse Canyon Switching Station Project or project circumstances that will require major revisions to the Mitigated Negative Declaration. It will not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts.	
CEQA SECTION	**Evaluation**
Aesthetics	**Potential Impact:** The new work areas will not have an adverse effect on a scenic vista, damage scenic resources, degrade the existing visual character, or create a new source of light or glare. The work areas on Crazy Horse Canyon Road will be visible to travelers on Crazy Horse Canyon Road, but construction activities will be temporary and short-term; therefore, impacts will be less than significant. Potential impacts are consistent with those evaluated in the FMND.
Agriculture and Forestry Resources	**No Impact:** The new work areas will not convert farmland of prime, unique, or statewide importance to non-agricultural use, conflict with existing zoning for agricultural use or a Williamson Act contract, or result in loss of farmland to non-agricultural use. Therefore, potential impacts are consistent with those evaluated in the FMND.
Air Quality and Greenhouse Gas Emissions	**No Impact:** The new work areas will not conflict with or obstruct implementation of applicable air quality plans, violate any air standard, result in a violation of an air quality standard, expose sensitive receptors to pollutant concentrations, or create objectionable odors. Therefore, potential impacts are consistent with those evaluated in the FMND.
Biological Resources	**Potential Impact:** A biological survey was performed for the new work areas on Crazy Horse Canyon Road and at Tower 10/50. The new workspaces may result in the removal of approximately seven oak trees; if possible, trees will be trimmed instead of removed. No special-status plant species were identified during surveys timed to coincide with the blooming period for special-status plants with potential to occur in the study area (April, May, and July), and no habitat for special-status wildlife was identified beyond that already identified in the FMND. A survey of the new pull site to the east of Tower 10/51 was performed by Biologist Vicki Trabold on July 29, 2014 and no sensitive resources were identified. Applicant Proposed Measures and mitigation measures will be implemented as described in the FMND and in the biological survey report. Therefore, potential impacts are consistent with those evaluated in the FMND.

Cultural Resources	**No Impact:** No cultural resources are known to exist within the new work areas. Therefore, potential impacts are consistent with those evaluated in the FMND.
Geology, Soils, and Seismicity	**No Impact:** The new work areas will not affect geology, soils, and seismicity. Therefore, potential impacts are consistent with those evaluated in the FMND.
Hazards and Hazardous Materials	**No Impact:** The new work areas will not create new significant hazards or require new hazardous materials beyond those already considered in the Proponent's Environmental Assessment. Environmental protection measures will be implemented as described in the FMND. Therefore, potential impacts are consistent with those evaluated in the FMND.
Hydrology and Water Quality	**No Impact:** The new work areas will not affect hydrology and water quality. Therefore, potential impacts are consistent with those evaluated in the FMND.
Land Use and Planning	**No Impact:** The new work areas will not physically divide an established community nor conflict with any applicable plans. Therefore, potential impacts are consistent with those evaluated in the FMND.
Mineral Resources	**No Impact:** The new work areas will not affect mineral resources. Therefore, potential impacts are consistent with those evaluated in the FMND.
Noise	**No Impact:** The new work areas will not result in noise levels inconsistent with levels evaluated in the FMND. Therefore, potential impacts are consistent with those evaluated in the FMND.
Population and Housing	**No Impact:** The new work areas will not affect population and housing. Therefore, potential impacts are consistent with those evaluated in the FMND.
Public Services	**No Impact:** The new work areas will not affect public services. Therefore, potential impacts are consistent with those evaluated in the FMND.
Recreation	**No Impact:** The new work areas will not affect recreation. Therefore, potential impacts are consistent with those evaluated in the FMND.
Transportation and Traffic	**Potential Impact:** The new work areas on Crazy Horse Canyon Road to erect guard structures will require flagmen and traffic may be delayed for short periods while the guard structures are being installed and removed. Additional traffic to and from the new work areas will be negligible. Therefore, potential impacts are consistent with those evaluated in the FMND.
Utilities and Service Systems	**No Impact:** The new work areas will not affect public services. Therefore, potential impacts are consistent with those evaluated in the FMND.

(2) Relocate Helicopter Landing Zone to Switching Station Pad

The project Proponent's Environmental Assessment (PEA), dated April 2010, proposed that the helicopter landing zone for the Crazy Horse Canyon Switching Station Project be located at a 2-acre site northwest of Tower 0/4 and the 500 kV transmission line, and accessed by an existing dirt road. In Minor Project Modification #1, dated July 30, 2012, PG&E requested the use of the helicopter landing zone that was part of the PG&E Hollister 115 kV Reconductoring Project, which was northwest of, and overlapped with, the landing zone proposed in the Crazy Horse Canyon Switching Station Project PEA.

PG&E is now requesting that the helicopter landing zone be relocated to the graveled yard of the switching station pad because it is closer to the work area and will minimize project impacts. PG&E anticipates using helicopters for conductor stringing starting in October 2014.

By relocating the landing zone to the already disturbed switching station pad, PG&E will minimize impacts to biological resources, air quality, and noise by limiting the work area to where active construction activities are currently ongoing. Air and noise impacts will be minimized because the access road to the Hollister landing zone will be used by vehicles and equipment less frequently due to relocation of the landing zone.

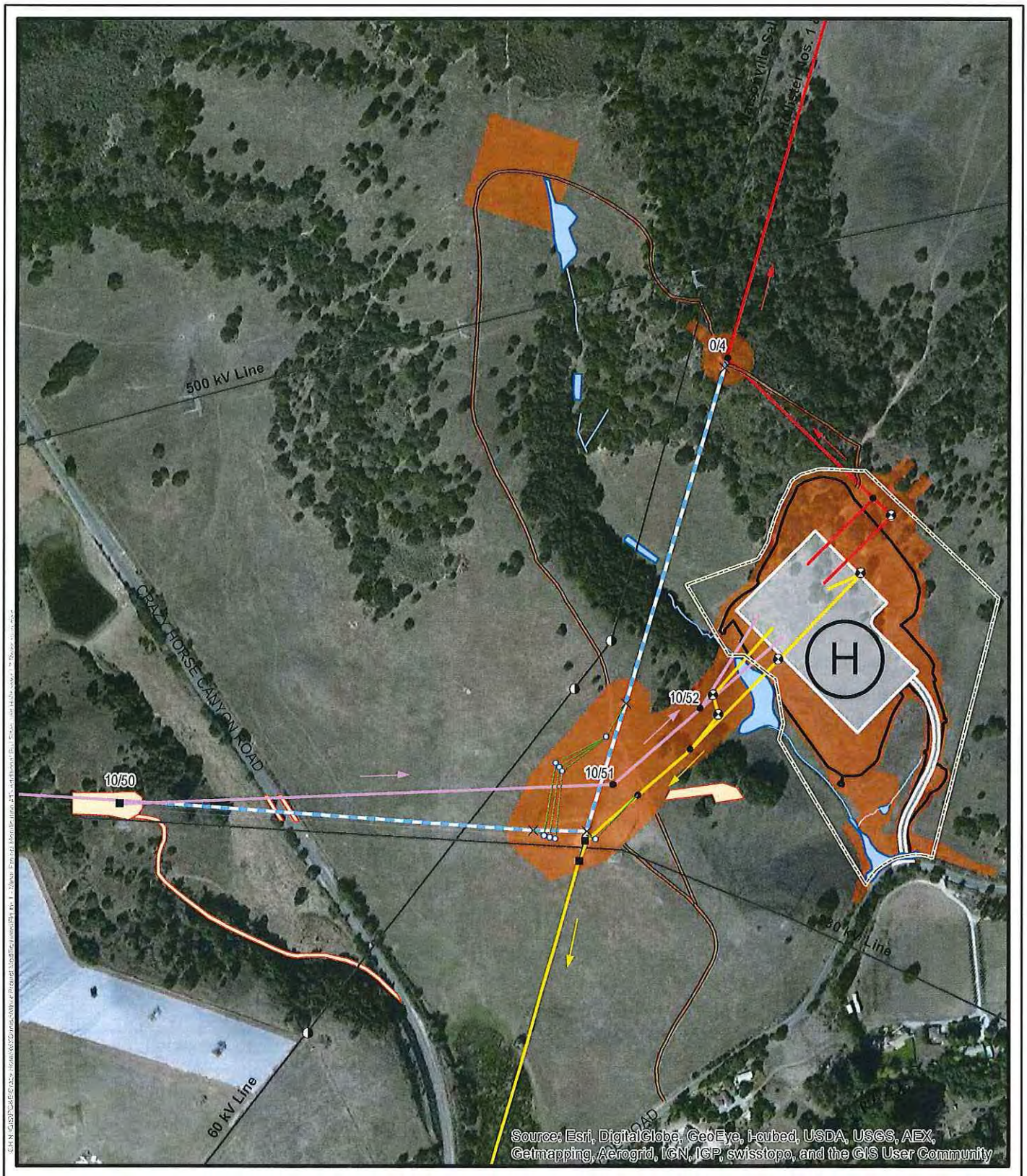
Neither the originally proposed landing zone nor the Hollister landing zone have been used as a landing zone or for staging by the Crazy Horse project. Likewise, the Hollister project did not use the Hollister landing zone north of the 500 kV line and this area remains undisturbed (the Hollister project was granted approval to land the helicopter near Tower 10/51). The Hollister landing zone represents 3.0 acres of approved temporary work area counted in the Incidental Take Permit mitigation acreage that will not be used by either the Crazy Horse or Hollister project.

Figure 1 shows the approved helicopter landing zone north of the 500 kV transmission line, and the proposed helicopter landing zone on the graveled yard of the switching station pad.

Justification:
Relocating the landing zone to the already-disturbed switching station pad will minimize impacts to biological resources, air quality, and noise by limiting the work area to where active construction activities are currently ongoing.

RESOURCE EVALUATION	
CEQA Guidelines 15162 review: The proposed minor project modification is relocate the helicopter landing zone to the switching station pad. It does not involve substantial changes to the Crazy Horse Canyon Switching Station Project or project circumstances that will require major revisions to the Mitigated Negative Declaration. It will not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts.	
CEQA SECTION	**Evaluation**
Aesthetics	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not have an adverse effect on a scenic vista, damage scenic resources, degrade the existing visual character, or create a new source of light or glare because the switching station pad is highly disturbed and construction activities are ongoing in this location. Therefore, potential impacts are consistent with those evaluated in the FMND.
Agriculture and Forestry Resources	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not convert farmland of prime, unique, or statewide importance to non-agricultural use, conflict with existing zoning for agricultural use or a Williamson Act contract, or result in loss of farmland to non-agricultural use. Therefore, potential impacts are consistent with those evaluated in the FMND.
Air Quality and Greenhouse Gas Emissions	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not conflict with or obstruct implementation of applicable air quality plans, violate any air standard, result in a violation of an air quality standard, expose sensitive receptors to pollutant concentrations, or create objectionable odors. Therefore, potential impacts are consistent with those evaluated in the FMND.
Biological Resources	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not result in new impacts to biological resources because it is a graveled yard. Biological resource impacts will be avoided by not using 3.0 acres of approved temporary workspace. Therefore, potential impacts are consistent with those evaluated in the FMND.
Cultural Resources	**No Impact:** No cultural resources are known to exist within the project area. Therefore, potential impacts are consistent with those evaluated in the FMND.
Geology, Soils, and Seismicity	**No Impact:** The switching station pad where the helicopter landing zone will be relocated is within the study area of the project. Therefore, potential impacts are consistent with those evaluated in the FMND.

Hazards and Hazardous Materials	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not create new significant hazards or require new hazardous materials beyond those already considered in the PEA. Environmental protection measures will be implemented as described in the FMND. Therefore, potential impacts are consistent with those evaluated in the FMND.
Hydrology and Water Quality	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not affect hydrology and water quality Therefore, potential impacts are consistent with those evaluated in the FMND.
Land Use and Planning	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not physically divide an established community nor conflict with any applicable plans. Therefore, potential impacts are consistent with those evaluated in the FMND.
Mineral Resources	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not affect mineral resources. Therefore, potential impacts are consistent with those evaluated in the FMND.
Noise	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not result in noise levels inconsistent with levels evaluated in the FMND. Therefore, potential impacts are consistent with those evaluated in the FMND.
Population and Housing	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not affect population and housing. Therefore, potential impacts are consistent with those evaluated in the FMND.
Public Services	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not affect public services. Therefore, potential impacts are consistent with those evaluated in the FMND.
Recreation	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not affect recreation. Therefore, potential impacts are consistent with those evaluated in the FMND.
Transportation and Traffic	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not affect transportation and traffic. Therefore, potential impacts are consistent with those evaluated in the FMND.
Utilities and Service Systems	**No Impact:** Relocation of the helicopter landing zone to the switching station pad will not affect public services. Therefore, potential impacts are consistent with those evaluated in the FMND.



- Existing tower
- Tower to be removed
- New tower location
- Existing wood pole(s)
- New TSP location
- Shoofly Circuit
- Helicopter landing zone
- Barbed-wire Fence

Reconfigured power lines
(arrows show direction of flow)
- Crazy Horse Canyon-Hollister Nos. 1 & 2
- Crazy Horse Canyon-Salinas-Soledad Nos. 1 & 2
- Moss Landing-Crazy Horse Canyon Nos. 1 & 2

- Power line to be removed
- Existing transmission or power line
- Existing access road
- Switching Station & Access Road
- Grade and Fill Boundary
- Permanent workspace
- Temporary workspace
- Seasonal wetland
- Intermittent drainage
- New workspace

9/3/2014

Figure 1 - Minor Project Modification #13
Additional Pull Sites and Helicopter LZ Relocation
Crazy Horse Canyon Switching Station Project

N

0 250 500 Feet

1:6,000

From:	Liver, Janet
To:	Aaron Lui
Cc:	Cristina Holstine; Cooney, Kathleen; Larry Elrod (PG&E)
Subject:	Crazy Horse: MPM #13 - Guard Structures on Crazy Horse Canyon Road - additional information
Date:	Friday, September 26, 2014 10:46:17 AM
Attachments:	image005.png

Aaron,

The guard structures to be installed on the west side of Crazy Horse Canyon Road will need to be on the inside of the fence. Access to install these poles will be by using the rancher's existing two-track, which parallels the fence line (red-dotted line that comes off of the more defined two-track that heads west to the pull site at the tower). Use of this two track has been discussed with the landowner and he has no concerns. The work area required to install the poles on the west side of the road is approximately 100 feet by 25 feet.

On the east side of Crazy Horse Canyon Road the guard structures will be installed between the road and the fence line. The work area at this location will be approximately 100 feet by 15 feet, and the northbound lane of Crazy Horse Canyon Road will need to be closed temporarily while the poles are being installed. The County of Monterey is being contacted about the temporary lane closure. Flaggers will be used to control traffic and the work will be scheduled to avoid peak commute times (i.e. between approximately 9 a.m. and 3 p.m.). We anticipate the County will want to know the specific date of the lane closure, which is of course dependent on when the MPM is approved (PG&E is prepared to install the guard structures as soon as next week).

The guard structures will remain in place for approximately five months.

Janet

Janet Liver
Senior Project Manager

101 2nd Street, Suite 300, San Francisco, CA 94105
T: 650-477-0417 | F: 415-541-9378

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Figure 2. Delineation map of the study area.

Crazy Horse Canyon Road – West Side

Crazy Horse Canyon Road – East Side

Attachment B

Biosearch Associates • PO Box 1220 • Santa Cruz, CA 95061 (831-662-3938)

Memorandum

To: Janet Liver, Senior Project Manager

Company: TRC Solutions, Inc.

From: Mark Allaback and Tom Mahony

Date: May 12, 2014

SUBJECT: Re: Biotic Assessment and Special-Status Plant Survey, Tower 10/50 Project, Crazy Horse Canyon Road, Monterey County, California

At your request, Biosearch Associates and Coast Range Biological LLC conducted a biotic assessment and special-status plant survey for the Tower 10/50 Project, located west of Crazy Horse Canyon Road, ~0.2-miles north of San Juan Grade Road, in Monterey County, California. The proposed project involves a temporary work area at Tower 10/50, installation of a guard structure on Crazy Horse Canyon Road, and use of an existing dirt access road between Crazy Horse Canyon Road and the temporary work area at Tower 10/50 (Figure 1). This report is a supplement to more extensive biological studies conducted for the PG&E Crazy Horse Canyon Switching Station Project, located east of the Tower 10/50 Project.

Project Site and Study Area

The project site consists of the temporary work area at Tower 10/50, guard structure on Crazy Horse Canyon Road, and existing dirt access road. The "study area" for this biotic assessment and special-status plant survey covers ~2.5-acres and includes the project site, where ground disturbance is proposed, and a ~25-foot buffer around this area (Figure 1). The study area is located between ~250 and ~350 feet elevation (USGS 1955) and slopes moderately toward Crazy Horse Canyon Road in the eastern portion of the study area. The study area is currently undeveloped but is actively grazed. Surrounding land uses include grazing, agriculture, and the PG&E Crazy Horse Canyon Switching Station Project, located ~0.3-miles to the east.

Three habitats have been previously mapped on the study area (TRC Solutions, Inc. 2010): Coast Live Oak Woodland, Non-Native Grassland, and Ruderal/Developed. The habitats observed during the current study matched the previously mapped types. Coast Live Oak Woodland, composed of the *Quercus agrifolia* Woodland Alliance[1], is dominated by a canopy of coast live oak (*Quercus agrifolia*[2]), with an understory of shrubs and forbs, including poison oak (*Toxicodendron diversilobum*), California blackberry (*Rubus ursinus*), blue elderberry (*Sambucus nigra*), coyote brush (*Baccharis pilularis*), yarrow (*Achillea millefolium*), miner's lettuce (*Claytonia perfoliata*), soap plant (*Chlorogalum pomeridianum*), wood fern (*Dryopteris arguta*), and California buttercup (*Ranunculus californica*). Non-Native Grassland is dominated by non-native grasses and forbs, including ripgut brome (*Bromus diandrus*), wild oats (*Avena barbata*), filaree (*Erodium botrys*), soft chess (*Bromus hordeaceus*), little quaking grass (*Briza minor*), English plantain (*Plantago lanceolata*), and sheep sorrel (*Rumex acetosella*), along with occasional native species such as Johnny jump-up (*Viola pedunculata*), purple needlegrass (*Stipa pulchra*), blue-eyed-grass (*Sisyrinchium bellum*), and common fiddleneck (*Amsinckia menziesii*). Ruderal/Developed habitat includes existing developed or disturbed areas, such as Crazy Horse Canyon Road and the dirt access road, and consists of bare ground or non-native species characteristic of Non-Native Grassland.

METHODS

Prior to the field surveys, a background literature search was conducted to document the potential for occurrence of special-status biotic resources on the study area. Since biological studies have been prepared for the Crazy Horse Canyon Switching Station Project located adjacent to the study area east of Crazy Horse Canyon Road (TRC Solutions, Inc. 2010a; 2010b), these studies formed the primary sources of background information for the current study[3], augmented by searches of the California Natural Diversity Data Base (CDFW 2014a), the CNPS Online Inventory (CNPS 2014), and U.S. Fish and Wildlife Service online database (USFWS 2014). In addition, other lists and publications were consulted, including National Wetlands Inventory maps (USFWS 2014b), topographic maps (USGS 1955), and aerial photographs.

Special-Status Plants and Sensitive Habitats

The previous botanical survey identified 38 special-status plants that could potentially occur in the study area region, and located three special-status plants on the property east of Crazy Horse Canyon Road: Pajaro manzanita (*Arctostaphylos pajaroensis*), Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*), and Monterey spineflower (*Chorizanthe punges* var. *pungens*) (TRC Solutions 2010). In addition, an unidentifiable orchid, which could be Yadon's rein orchid (*Piperia yadonii*), was observed. These species, along with others identified in the botanical report as having potential to occur in the area, were searched for during the current study. In addition, other sensitive botanical resources, such as wetlands or sensitive plant communities, were searched for.

---

[1] Vegetation nomenclature follows Sawyer et al. (2009).
[2] Botanical nomenclature follows Baldwin et al. (2012).
[3] See these reports for special-status plant and wildlife species with potential to occur in the study area vicinity.

After the background literature search was completed, Botanist Tom Mahony traversed the study area on foot on 29 April, 2014 following methods outlined in Nelson (1987) and CDFG (2009). All plant species observed were noted (Appendix A). Plants that could not be identified in the field were taken back to the lab and keyed using Baldwin et al. (2012). Potential sensitive resources were mapped in the field with a Trimble GPS unit (sub-meter accuracy) and overlain on a 2012 digital orthophoto (obtained from NAIP) using ArcGIS mapping software.

Special-Status Wildlife

Wildlife Biologist Mark Allaback traversed the study area on foot on 29 April 2014. The study area and surrounding buffer was searched for potential special-status species habitat.

Other Wildlife

Species observed or detected by sign during the site visit are provided in Appendix B. Potential roosting habitat may be present for bats, but special-status species are not expected. Focused wildlife studies were not conducted.

Results and Recommendations

Special-Status Plants

Ninety-eight plant species were observed on the study area during the 2014 plant survey (Appendix A). None of these are special-status species. The survey was timed to coincide with the blooming period of spring-blooming special-status plants with potential to occur on the study area. However, the survey occurred prior to the blooming period of late-spring and summer-blooming special-status plant species (TRC Solutions 2010), and additional surveys are necessary to determine the presence or absence of these species on the study area. Additional special-status plant surveys should be conducted in the late spring and summer to determine the presence or absence of special-status plants on the study area and

Mitigation Measure Biology-17 should be implemented.

Sensitive Habitats

A potential jurisdictional wetland was observed in the southeastern portion of the study area (Figure 1). A formal jurisdictional wetland delineation was not conducted as part of this assessment, but a shallow concave basin supporting some wetland-classified (Lichvar 2013) plant species, including iris-leaved rush (*Juncus xiphioides*) and spiny cocklebur (*Xanthium spinosum*), was observed during the reconnaissance site visit. The basin drains into a culvert under Crazy Horse Canyon Road and into Lagunita Lake, which is a tributary to Gabilan Creek. A drainage was previously mapped in the vicinity (USGS 1955; USFWS 2014b). Wetlands and other waters fall under the regulatory jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. Work, such as placement of fill material, occurring within the jurisdiction of these agencies normally requires a permit.

The potential wetland is located north of the access road, and will be avoided by the project. However, to prevent inadvertent wetland impacts (such as using the area for parking, staging, or storage) during project construction, **Mitigation Measure Biology-6** should be implemented on the north edge of the dirt access road, south of the potential wetland.

Special-Status Wildlife

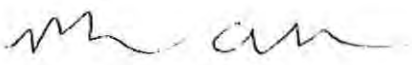
Potential habitat was present for coast range newt (*Taricha torosa torosa*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus*) and American badger (*Taxidea taxus*). Coast range newts, if present, would be underground during the summer months until the next rainy season. There is a low likelihood that the species is present, since aquatic sampling conducted at nearby Lake Lagunita did not detect the species (Allaback, pers. comm.). A single dispersing subadult Coast Range newt was detected along the wildlife exclusion fence during a cover-board study conducted in the winter of 2012-2013 at the Crazy Horse Switchyard project site ~1.5 miles east (Allaback, pers. comm.). No white-tailed kite nests were present in or near the work area, but the species could use adjacent habitat for nesting. No loggerhead shrikes have been reported in the area during the breeding season although one was seen during the winter at the Crazy Horse Switchyard project site (Allaback, pers. comm.). No American badger diggings were observed, although the species is known from the area and could enter the work area prior to construction. One to four woodrat houses are expected to be affected by vegetation removal or trimming, but previous analysis indicated that the Neotoma sp. present in the area was not designated as a Species of Special Concern by the California Department of Fish and Wildlife (CDFW) (TRC Solutions, Inc. 2010).

Other Wildlife

Potential habitat is present for a variety of nesting birds. Potential habitat may be present for roosting bats, although no cavities or hollows were noted in the trees that will be removed or trimmed. Mitigation Measure Biology-29 should be implemented to address bat roosts, Mitigation Measures Biology-36 and Biology-27 implemented to address nesting birds, Mitigation Measure Biology-31 implemented to address American badger, and Mitigation Measures Biology-34 and Biology-35 implemented to address Coast Range newt.

Please contact me if you have questions or need additional information.

Sincerely,



Mark Allaback, Wildlife Biologist

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Appendix A. Plant species observed on the study area during the 29 April, 2014 survey.

Scientific Name	Common Name
Acer negundo	box elder
Achillea millefolium	yarrow
Aesculus californica	California buckeye
Amsinckia menziesii	common fiddleneck
*Anagallis arvensis**	scarlet pimpernel
*Anthriscus caucalis**	bur-chervil
*Avena barbata**	slender wild oat
Baccharis pilularis	coyote brush
*Brassica nigra**	black mustard
*Briza minor**	little quaking grass
Brodiaea terrestris	dwarf brodiaea
Bromus carinatus	California brome
*Bromus diandrus**	ripgut brome
*Bromus hordeaceus**	soft chess
Calystegia subacaulis	hill morning glory
*Capsella bursa-pastoris**	shepherd's purse
*Carduus pycnocephalus**	Italian thistle
Carex sp.	sedge
Ceanothus sp.	ceanothus
Chenopodium sp.	chenopodium
Chlorogalum pomeridianum	soap plant
*Cirsium vulgare**	bull thistle
Claytonia perfoliata	miner's lettuce

Scientific Name	Common Name
*Conium maculatum**	poison hemlock
Corethrogyne filaginifolia	California aster
Dichelostemma capitatum	blue dicks
Dryopteris arguta	wood fern
Elymus glaucus	blue wildrye
*Erodium botrys**	filaree
*Erodium brachycarpum**	short-fruit stork's bill
*Erodium cicutarium**	redstem filaree
*Festuca myuros**	rattail fescue
*Festuca perennis**	Italian ryegrass
*Foeniculum vulgare**	fennel
Frangula californica	California coffeeberry
Galium aparine	goose grass
*Geranium dissectum**	cutleaf geranium
*Geranium molle**	geranium
Gnaphalium purpureum	purple everlasting
*Helminthotheca echioides**	bristly ox-tongue
*Hirschfeldia incana**	shortpod mustard
Hordeum brachyantherum	meadow barley
Hordeum murinum subsp. *leporinum**	barley
*Hypochaeris glabra**	smooth cat's ear
*Hypochaeris radicata**	rough cat's ear
Juncus balticus	Baltic rush

Scientific Name	Common Name
Juncus patens	spreading rush
Juncus xiphioides	iris-leafed rush
Lathyrus sp.	pea
*Logfia gallica**	narrowleaf cottonrose
*Lotus corniculatus**	birds-foot trefoil
Lupinus bicolor	miniature lupine
*Lythrum hyssopifolia**	hyssop loosestrife
*Malva parviflora**	cheeseweed
Marah fabacea	California man-root
*Marrubium vulgare**	horehound
*Matricaria discoidea**	pineapple weed
*Medicago polymorpha**	bur clover
*Melilotus indicus**	sour clover
Nemophila menziesii	baby blue eyes
*Oxalis corniculata**	yellow sorrel
Pentagramma triangularis	goldback fern
Plagiobothrys sp.	popcorn flower
*Plantago coronopus**	cutleaf plantain
*Plantago lanceolata**	English plantain
*Poa annua**	annual bluegrass
*Polygonum arenastrum**	common knotweed
Quercus agrifolia	coast live oak
Ranunculus californicus	California buttercup

Scientific Name	Common Name
*Raphanus sativus**	wild radish
Rubus ursinus	California blackberry
*Rumex acetosella**	sheep sorrel
*Rumex crispus**	curly dock
Rumex salicifolius	willow dock
Sambucus nigra	blue elderberry
Sanicula crassicaulis	Pacific snakeroot
*Senecio vulgaris**	common groundsel
*Silybum marianum**	milk thistle
Sisyrinchium bellum	blue-eyed grass
*Solanum nigrum**	black nightshade
Sonchus asper subsp. *asper**	prickly sow thistle
*Sonchus oleraceus**	common sow thistle
Stachys bullata	hedge nettle
*Stellaria media**	common chickweed
Stipa pulchra	purple needlegrass
Symphoricarpos albus	snowberry
*Taraxacum officinale**	common dandelion
Taraxia ovate	suncup
Toxicodendron diversilobum	poison oak
*Torilis arvensis**	hedge parsley
*Trifolium dubium**	little hop clover
*Trifolium hirtum**	red clover

Scientific Name	Common Name
*Triticum aestivum** (?)	wheat
*Vicia sativa**	common vetch
*Vicia villosa**	hairy vetch
Viola pedunculata	Johnny jump-up
Wyethia angustifolia	narrowleaf mule ears
Xanthium spinosum	spiny cocklebur
* = Non-native species	

Appendix B. Wildlife species observed or detected by sign during the 29 April 2014 survey.

Reptilia	**Reptiles**
Phrynosomatidae	Spiny Lizards
Sceloporus occidentalis	Western fence lizard
Aves	**Birds**
Odontophoridae	New World Quail
Callipepla californica	California quail
Cathartidae	American Vultures
Cathartes aura	Turkey vulture
Accipitridae	Hawks, Kites and Eagles
Buteo jamaicensis	Red-tailed hawk
Trochilidae	Hummingbirds
Calypte anna	Anna's hummingbird
Tyrannidae	Tyrant Flycatchers
Empidonax difficilis	Pacific-slope flycatcher
Myiarchus cinerascens	Ash-throated flycatcher
Corvidae	Jays, Magpies and Crows
Aphelocoma californica	Western scrub-jay
Corvus brachyrhynchos	American crow
Corvus corax	Common raven
Troglodytidae	Wrens
Thryomanes bewickii	Bewick's wren
Turdidae	Thrushes
Turdus migratorius	American robin
Timaliidae	Babblers
Chamaea fasciata	Wrentit

Parulidae	Wood-Warblers
Vermivora celata	Orange-crowned warbler
Emberizidae	Sparrows
Pipilo maculatus	Spotted towhee
Pipilo crissalis	California towhee

Mammalia **Mammals**

Leporidae	Rabbits and hares
Lepus californicus	Black-tailed jackrabbit
Geomyidae	Pocket gophers
Thomomys bottae	Botta's pocket gopher
Family Muridae	Mice, rats and voles
Neotoma fuscipes sp.	Dusky-footed woodrat
Canidae	Foxes, Wolves and relatives
Canis latrans	Coyote

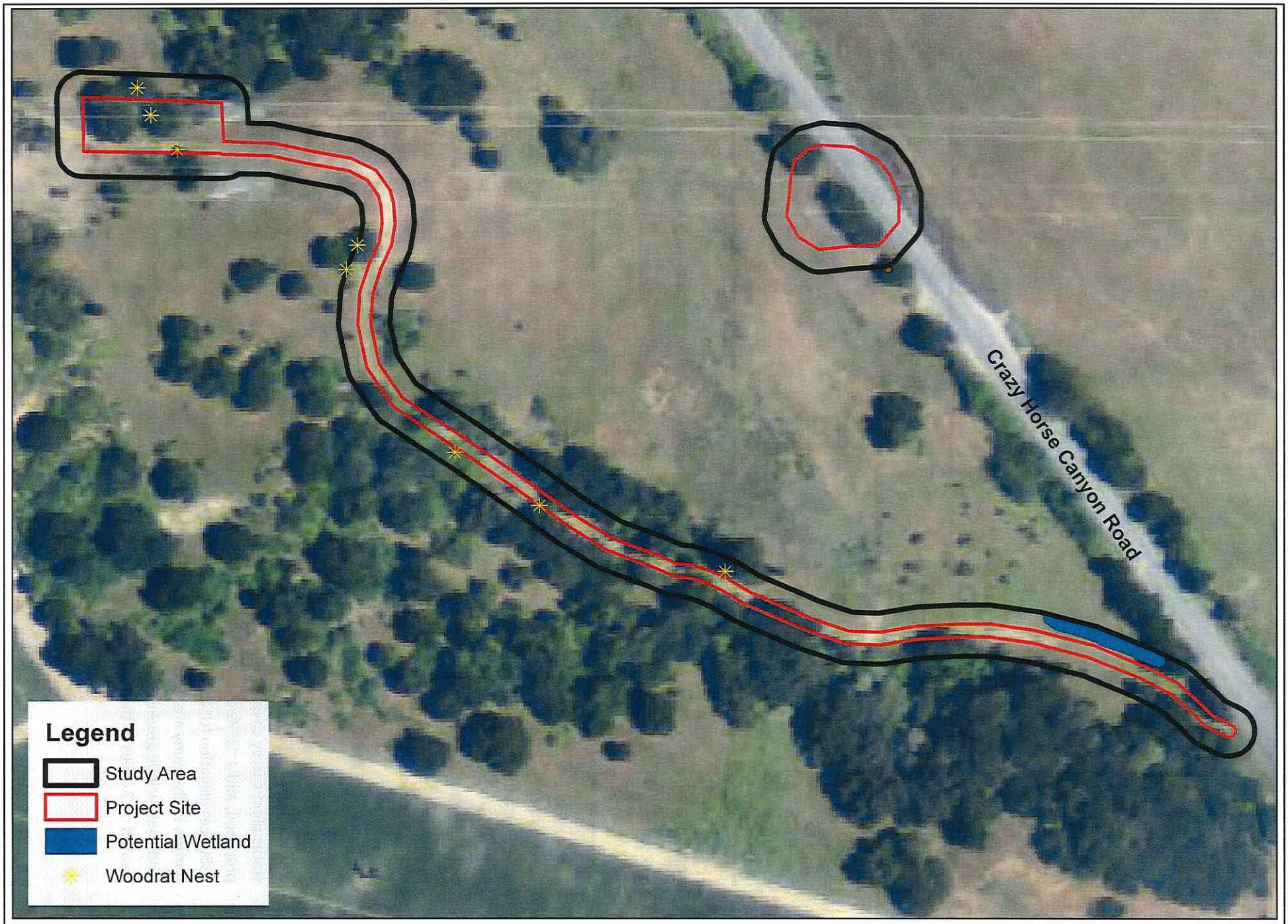

Figure 1.Study area map.
Basemap: NAIP (2012).

Mapscale: 1:1,500
0 75 150 300 Feet

Coast Range

N

COAST RANGE
BIOLOGICAL LLC

July 3, 2014

Janet Liver
Senior Project Manager
TRC Solutions, Inc.
101 2nd Street, Suite 300
San Francisco, CA 94105

Re: Special-Status Plant Survey, Tower 10/50 Project, Crazy Horse Canyon Road, Monterey County, California

Dear Ms. Liver:

At your request, I conducted a special-status plant survey for the Tower 10/50 Project, located west of Crazy Horse Canyon Road, ~0.2-miles north of San Juan Grade Road, in Monterey County, California. The proposed project involves a temporary work area at Tower 10/50, installation of a guard structure on Crazy Horse Canyon Road, and use of an existing dirt access road between Crazy Horse Canyon Road and the temporary work area at Tower 10/50. The "study area" for this special-status plant survey covers ~2.5-acres and includes the project site, where ground disturbance is proposed, and a ~25-foot buffer around this area (Figure 1).

More extensive biological studies have been conducted in the immediate study area vicinity for the PG&E Crazy Horse Canyon Switching Station Project, located east of the Tower 10/50 Project (TRC Solutions, Inc. 2010), and a Biotic Assessment was recently prepared on the study area for the Tower 10/50 project (Bioscarch Associates 2014)[1]. The Biotic Assessment recommended conducting special-status plant surveys on the study area, and this report is intended to satisfy that recommendation.

METHODS

Prior to the field visits, a background literature search was conducted to determine which special-status plants have potential to occur on the study area. Previous biological studies (TRC Solutions, Inc. 2010; Biosearch Associates 2014) identified 38 special-status plants that could potentially occur in the study area region, and the field visits for this study were timed to coincide with the blooming period of these species. In addition to the plant survey conducted on April 29, 2014 as part of the Biotic Assessment, I conducted two additional plant surveys, on May 27 and July 3, 2014. I traversed the study area on foot following methods outlined in Nelson (1987) and CDFG (2009). All plant species observed were noted (Appendix A). Plants that could not be identified in the field were taken back to the lab and keyed using Baldwin et al. (2012).

RESULTS

During the 2014 plant surveys, 125 plant species were observed on the study area (Appendix A). None of these are special-status species. The surveys were timed to coincide with the blooming period of special-status plants with potential to occur on the study area. Since no special-status plant species were observed

[1] See these reports for detailed habitat and other descriptions of the study area and surrounding region.

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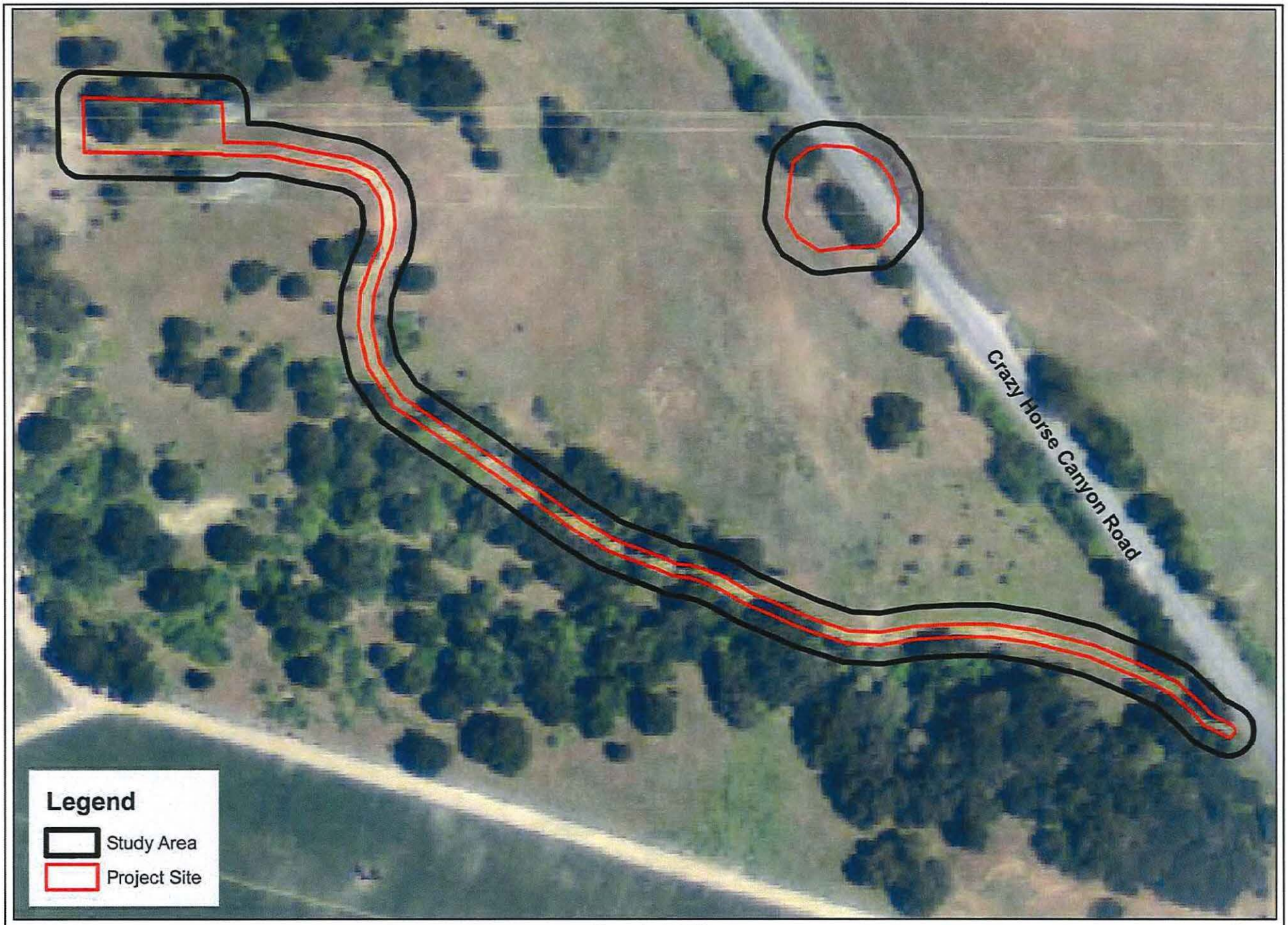

Figure 1.Study area map.
Basemap: NAIP (2012).

on the study area during the 2014 surveys, no special-status plants are expected to occur on the study area, no impacts to special-status plants are anticipated from the project, and no additional botanical surveys are recommended.

The conclusions of this report reflect conditions observed at the time of the field visits and my interpretation of those conditions. Please contact me if you have questions or need additional information.

Sincerely,

Tom Mahony
Principal/Plant Ecologist

REFERENCES

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Appendix A. Plant species observed on the study area during the 2014 surveys.

Scientific Name	Common Name
Acer negundo	box elder
Achillea millefolium	yarrow
Acmispon glaber	deerweed
Aesculus californica	California buckeye
*Aira caryophyllea**	silver hairgrass
Amsinckia menziesii	common fiddleneck
*Anagallis arvensis**	scarlet pimpernel
*Anthriscus caucalis**	bur-chervil
*Avena barbata**	slender wild oat
Baccharis pilularis	coyote brush
*Brassica nigra**	black mustard
*Briza minor**	little quaking grass
Brodiaea terrestris	dwarf brodiaea
Bromus carinatus	California brome
*Bromus diandrus**	ripgut brome
*Bromus hordeaceus**	soft chess
Bromus madritensis subsp. *rubens**	red brome
Calochortus luteus	yellow Mariposa lily
Calystegia subacaulis	hill morning glory
Camissonia sp.	sun cup
*Capsella bursa-pastoris**	shepherd's purse
*Carduus pycnocephalus**	Italian thistle
*Carduus tenuiflorus**	plumeless thistle
Carex sp.	sedge
Ceanothus sp.	ceanothus
*Centaurea melitensis**	tocalote
Chenopodium sp.	chenopodium
Chlorogalum pomeridianum	soap plant
*Cirsium vulgare**	bull thistle
Clarkia sp.	clarkia
Claytonia perfoliata	miner's lettuce
*Conium maculatum**	poison hemlock
Corethrogyne filaginifolia	California aster
Croton setigerus	turkey-mullein
*Cynodon dactylon**	Bermuda grass
Deinandra increscens subsp. *increscens*	grassland tarweed
Dichelostemma capitatum	blue dicks
Dryopteris arguta	wood fern
Elymus glaucus	blue wildrye
Erigeron canadensis	horseweed
*Erodium botrys**	filaree
*Erodium brachycarpum**	short-fruit stork's bill
*Erodium cicutarium**	redstem filaree
*Festuca myuros**	rattail fescue
*Festuca perennis**	Italian ryegrass

Scientific Name	Common Name
*Foeniculum vulgare**	fennel
Frangula californica	California coffeeberry
Galium aparine	goose grass
*Geranium dissectum**	cutleaf geranium
*Geranium molle**	geranium
Gnaphalium purpureum	purple everlasting
*Helminthotheca echioides**	bristly ox-tongue
*Hirschfeldia incana**	shortpod mustard
Hordeum brachyantherum	meadow barley
Hordeum marinum subsp. *gussoneanum**	Mediterranean barley
Hordeum murinum subsp. *leporinum**	barley
*Hypochaeris glabra**	smooth cat's ear
*Hypochaeris radicata**	rough cat's ear
Juncus balticus	Baltic rush
Juncus patens	spreading rush
Juncus phaeocephalus	brownheaded rush
Lathyrus vestitus var. *vestitus*	wild pea
Lathyrus sp.	pea
*Logfia gallica**	narrowleaf cottonrose
*Lotus corniculatus**	birds-foot trefoil
Lotus sp.	lotus
Lupinus bicolor	miniature lupine
*Lythrum hyssopifolia**	hyssop loosestrife
Madia sativa	coast tarweed
*Malva parviflora**	cheeseweed
Marah fabacea	California man-root
*Marrubium vulgare**	horehound
*Matricaria discoidea**	pineapple weed
*Medicago polymorpha**	bur clover
Melica cf. californica	California melic grass
*Melilotus indicus**	sour clover
*Mentha pulegium**	pennyroyal
Navarretia squarrosa	skunkweed
Nemophila menziesii	baby blue eyes
*Oxalis corniculata**	yellow sorrel
Pentagramma triangularis	goldback fern
Phalaris sp.*	Harding grass
Phyla nodiflora	phyla
Plagiobothrys sp.	popcorn flower
*Plantago coronopus**	cutleaf plantain
*Plantago lanceolata**	English plantain
*Poa annua**	annual bluegrass
Polygonum aviculare subsp. *depressum**	common knotweed
*Polypogon monspeliensis**	rabbitsfoot grass
*Pseudognaphalium luteoalbum**	cudweed
Quercus agrifolia	coast live oak
Ranunculus californicus	California buttercup

Scientific Name	Common Name
*Raphanus sativus**	wild radish
Rubus ursinus	California blackberry
*Rumex acetosella**	sheep sorrel
*Rumex crispus**	curly dock
*Rumex pulcher**	fiddle dock
Rumex salicifolius	willow dock
Sambucus nigra	blue elderberry
Sanicula crassicaulis	Pacific snakeroot
*Senecio vulgaris**	common groundsel
*Silene gallica**	windmill pink
*Silybum marianum**	milk thistle
Sisyrinchium bellum	blue-eyed grass
*Solanum nigrum**	black nightshade
Sonchus asper subsp. *asper**	prickly sow thistle
*Sonchus oleraceus**	common sow thistle
Stachys bullata	hedge nettle
*Stellaria media**	common chickweed
Stipa pulchra	purple needlegrass
*Spergularia rubra**	sand-spurrey
Symphoricarpos albus	snowberry
*Taraxacum officinale**	common dandelion
Taraxia ovate	suncup
Toxicodendron diversilobum	poison oak
*Torilis arvensis**	hedge parsley
*Trifolium angustifolium**	narrow-leaved clover
*Trifolium dubium**	little hop clover
*Trifolium hirtum**	red clover
Triteleia ixioides subsp. *ixioides*	golden brodiaea
Vicia sativa subsp. *sativa**	common vetch
*Vicia villosa**	hairy vetch
Viola pedunculata	Johnny jump-up
Wyethia angustifolia	narrowleaf mule ears
Xanthium spinosum	spiny cocklebur
* = Non-native species	

From:	Liver, Janet
To:	Aaron Lui
Subject:	FW: PG&E Crazy Horse Switching Station - Slope stabilization and ITP acreages
Date:	Monday, October 06, 2014 11:42:58 AM

Janet

650-477-0417

From: Mark Allaback [mailto:markallaback@sbcglobal.net]
Sent: Tuesday, August 05, 2014 1:36 PM
To: Bahm, Sarah@Wildlife; Liver, Janet
Cc: Cristina Holstine; Cooney, Kathleen; Bailey, Craig@Wildlife; Aaron Lui (aaron.lui@panoramaenv.com); Lisa Orsaba (lisa.orsaba@cpuc.ca.gov)
Subject: Re: PG&E Crazy Horse Switching Station - Slope stabilization and ITP acreages

Hi Team. I agree with CDFW's response and its consistency with the specific project.

Take care.

Mark Allaback, Wildlife Biologist, Biosearch Associates, Santa Cruz, CA, 831-662-3938 (office) 831-345-9676 (mobile)

From: "Bahm, Sarah@Wildlife" <Sarah.Bahm@wildlife.ca.gov>
To: "Liver, Janet" <jliver@trcsolutions.com>
Cc: Cristina Holstine <CGS4@PGE.COM>; "Cooney, Kathleen" <KCooney@trcsolutions.com>; "Bailey, Craig@Wildlife" <Craig.Bailey@wildlife.ca.gov>; "Aaron Lui (aaron.lui@panoramaenv.com)" <aaron.lui@panoramaenv.com>; "Lisa Orsaba (lisa.orsaba@cpuc.ca.gov)" <lisa.orsaba@cpuc.ca.gov>; Mark Allaback (Biosearch) <markallaback@sbcglobal.net>
Sent: Tuesday, August 5, 2014 11:57 AM
Subject: RE: PG&E Crazy Horse Switching Station - Slope stabilization and ITP acreages

Janet,

While we don't disagree with Mr. Allaback's analysis and determination that the pull site on the west side of Crazy Horse Canyon Road is not "ideal" CTS habitat, there is no exception under CESA for excluding marginal habitat. Since Mr. Allaback believes this area is important for gene flow and habitat connectivity, we will add this area to the ITP for temporary impacts to CTS. If a CTS was found while working in this area and it is not covered under this ITP, it would result in a probable enforcement action. We will, however, take Mr. Allaback's analysis into account when determining the amount of compensation for this area and it will result in a low compensation ratio.

Please let me know if you have any questions. I am nearly finished with drafting the amendment and associated documents and will be sending them to Craig later today. Additionally, I noticed that I have not yet received May and June's monthly reports for this project. Please provide these as soon as you are able.

Thanks,

Sarah

From: Liver, Janet [mailto:jliver@trcsolutions.com]
Sent: Monday, August 04, 2014 5:18 PM
To: Bahm, Sarah@Wildlife
Cc: Cristina Holstine; Cooney, Kathleen; Bailey, Craig@Wildlife; Aaron Lui (aaron.lui@panoramaenv.com); Lisa Orsaba (lisa.orsaba@cpuc.ca.gov); Mark Allaback (Biosearch)
Subject: FW: PG&E Crazy Horse Switching Station - Slope stabilization and ITP acreages

Sarah – below is an email from Mark Allaback with the requested information on his determination regarding CTS and the bio survey report he prepared for the workspace west of San Juan Grade Road. I've included Mark on this email in the event additional information is required.

Thanks.

Janet

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

650-477-0417 Phone
415-541-9378 Fax

From: Mark Allaback [mailto:markallaback@sbcglobal.net]
Sent: Monday, August 04, 2014 5:08 PM
To: Liver, Janet
Subject: Re: PG&E Crazy Horse Switching Station - Slope stabilization and ITP acreages

Hi Janet. I made the determination based on the results of focused studies we conducted at nearby Lake Lagunitas and the Crazy Horse Switchyard in 2009-2010 (which included an intensive large-scale pitfall trap study), a cover-board study conducted during the winter of 2012-2013 around the Switchyard, daily monitoring at the Switchyard from Nov 2013-May 2014, and the negative results of several monitoring studies by other consultants associated with construction of the Switchyard and nearby towers from ~2010-2014 (Liver, pers. comm.). All these studies resulted in the detection of a single CTS metamorph at the Switchyard property in 2010. That animal was clearly dispersing since it was caught entering and subsequently leaving the Switchyard property. If the grassland in and around the Switchyard property supported upland occupied by CTS that utilized nearby ponds, many more detections would have been made during the pitfall trap study. It is important to embrace the results of field studies conducted according to the approved protocol, and interpret the results appropriately.

The remaining CTS habitat in the area is significantly constrained by nearby agricultural development in and around the Salinas Valley and large patches of non-habitat (dense scrub and oak woodland), as well as some impoundments that support predatory fish. It is my contention that the area does facilitate some gene flow via dispersers and is therefore important for habitat connectivity, but that there is no indication of a latent reproducing population with multiple generations of over-summering CTS in the vicinity of San Juan Grade Road and Crazy Horse Canyon Road. With respect to CTS, I view the area

as a habitat "bottleneck."

Let me know if you have any questions.

Mark Allaback, Wildlife Biologist, Biosearch Associates, Santa Cruz, CA, 831-662-3938 (office) 831-345-9676 (mobile)

From: "Liver, Janet" <jliver@trcsolutions.com>
To: Mark Allaback (Biosearch) <markallaback@sbcglobal.net>
Sent: Monday, August 4, 2014 1:38 PM
Subject: FW: PG&E Crazy Horse Switching Station - Slope stabilization and ITP acreages

Mark – see below. Thanks.

Janet

From: Bahm, Sarah@Wildlife [mailto:Sarah.Bahm@wildlife.ca.gov]
Sent: Monday, August 04, 2014 1:24 PM
To: Liver, Janet
Cc: Cristina Holstine; Cooney, Kathleen; Bailey, Craig@Wildlife; Aaron Lui (aaron.lui@panoramaenv.com); Lisa Orsaba (lisa.orsaba@cpuc.ca.gov)
Subject: RE: PG&E Crazy Horse Switching Station - Slope stabilization and ITP acreages

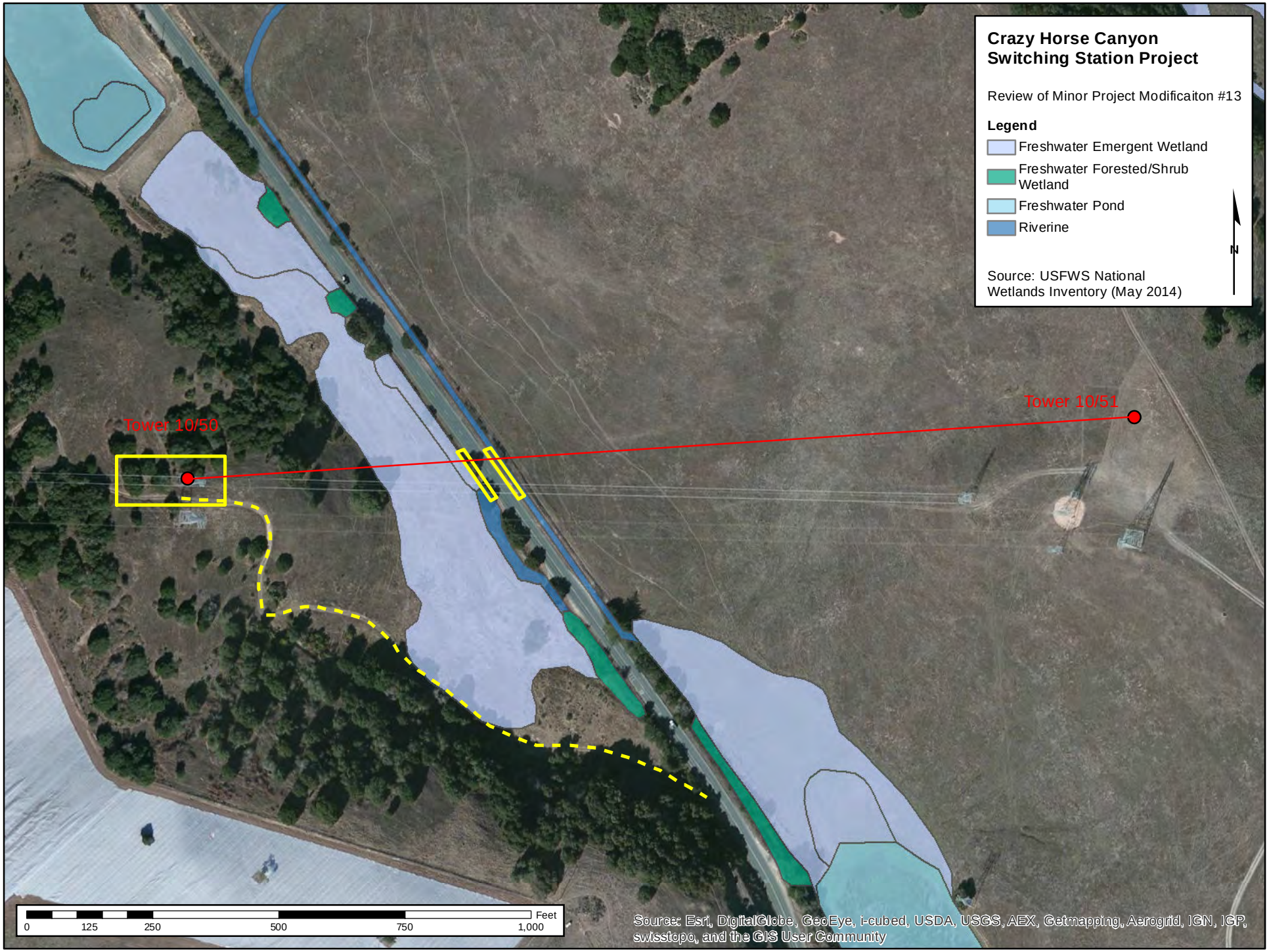
Janet,

Thank you for providing all of this information. I have a question about the biological survey report for the pull site on the west side of Crazy Horse Canyon Road. In the email and on the phone, you mentioned that this area was not deemed as CTS habitat by Mark Allaback, but there was no discussion of why and how he made this determination in the survey report. Can you provide more information regarding his reasoning for this determination (e.g., no small mammal burrows within 50 feet of pull site and access road, distance to potential breeding ponds, etc.)?

Please let me know if you have any questions.

Thanks,

Sarah


Crazy Horse Canyon
Switching Station Project
Review of Minor Project Modificaiton #13
Legend
Freshwater Emergent Wetland
Freshwater Forested/Shrub Wetland
Freshwater Pond
Riverine
Source: USFWS National Wetlands Inventory (May 2014)
N
Tower 10/50
Tower 10/51
0
125
250
500
750
1,000
Feet
Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Attachment C

Garcia and Associates
Natural and Cultural Resources Consultants
1 Saunders Avenue
San Anselmo, California 94960
Phone: 415.458.5803
Fax: 415.458.5829

GANDA

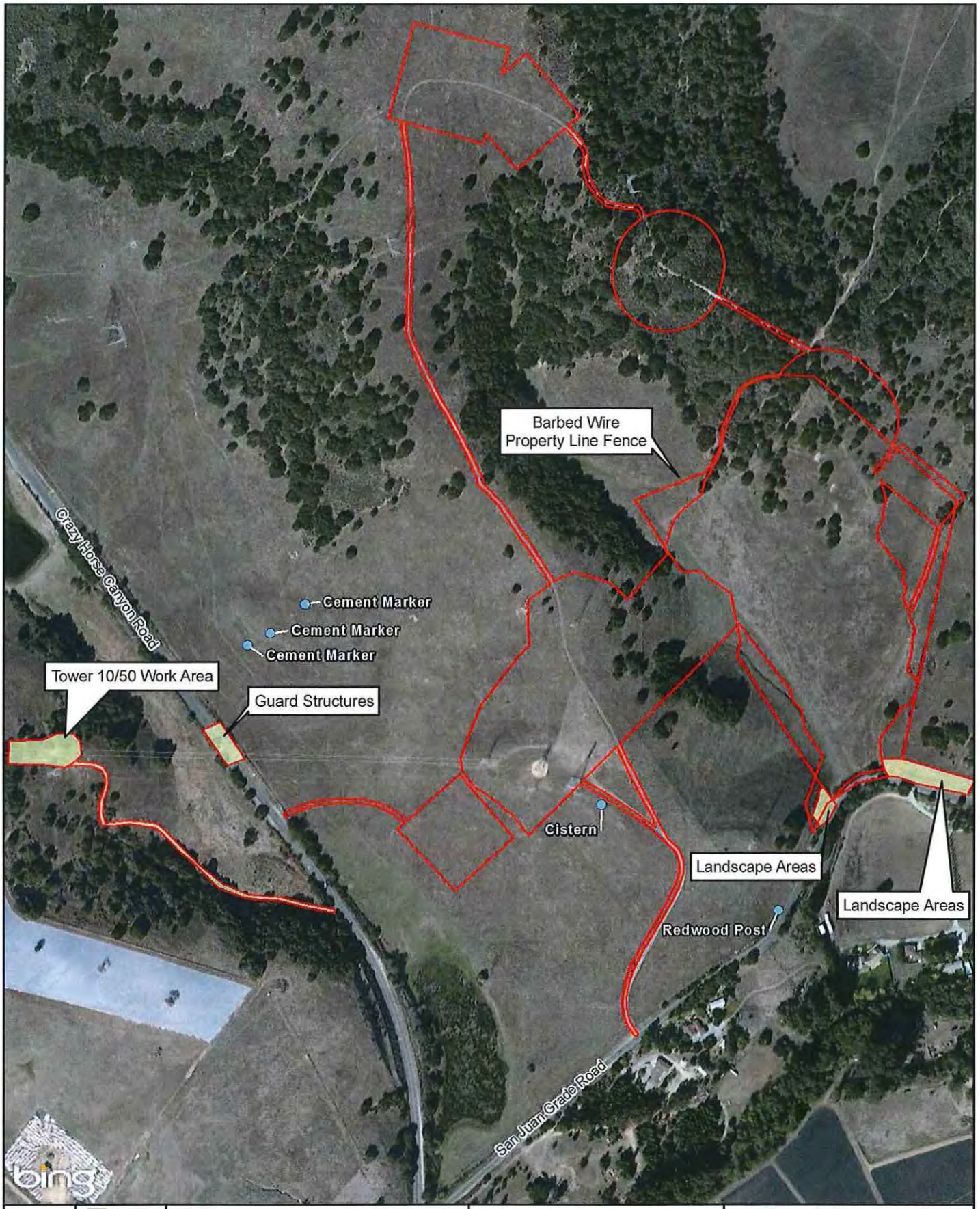
To: Janet Liver, TRC Solutions
From: Cassidy DeBaker and Julian Plath, Archaeologists, Garcia and Associates
Date: May 21, 2014
RE: Cultural Resources Addendum for the Crazy Horse Switching Station Project: Additional Work Areas, Monterey County, California.

Garcia and Associates (GANDA) prepared this addendum to the Cultural Resources Investigation for the Crazy Horse Switching Station Project, Monterey County, California. The purpose of this addendum is to address cultural resource identification for three new work areas located within the Area of Direct Impacts (ADI): 1) Tower 10/50 Work Area; 2) Guard Structures; and 3) Landscaping Areas (Figure 1). The Project Area is located northeast and southwest of the intersection of Crazy Horse Canyon Road and San Juan Grade Road, at the convergence of numerous Pacific Gas and Electric (PG&E) transmission lines. The objectives of the overall Project are to improve transmission reliability by allowing PG&E to quickly detect power outages on the existing 115-kV lines, and to increase operational flexibility by allowing PG&E to re-route power on the existing 115-kV lines to serve existing customers while simultaneously performing routine or emergency maintenance on lines connected to the station. The ADI has been amended to include the three new work areas (see Figure 1).

This addendum has been prepared in compliance with the *Crazy Horse Canyon Switching Station Final Initial Study/Mitigated Negative Declaration (IS/MND)* (RMT, Inc. 2011) and to address the requirements for review under the California Environmental Quality Act (CEQA). The California Public Utilities Commission (CPUC) is the CEQA Lead Agency. GANDA previously completed a cultural resources investigation for this Project in 2010 and 2012, which did not result in the identification of historical resources within the ADI (Siskin et al. 2010 and DeBaker 2012).

The purpose of this study was to identify and record cultural resources within the new work areas depicted in Figure 1. GANDA archaeologists conducted a records search updated at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) on April 23, 2014 and a pedestrian survey on April 28, 2014. Based on the background research and field survey conducted for this investigation, no cultural resources have been identified within the ADI. Findings for this report are based on the following:

- review of the Project's technical documents and new work areas;
- records search update at the NWIC; and
- pedestrian survey of the new work areas within the ADI.



GANDA

Project Location

Historic Resources
ADI
Area covered by April 28, 2014 pedestrian survey

0 100 200 300 400 Feet
0 25 50 75 100 Meters

N

Figure 1. Crazy Horse Canyon Switching Station

Monterey County, CA
May 2014

Records Search Update

Archaeologists conducted a records search update at the NWIC on April 23, 2014. The records search results indicate that three cultural resources studies have been completed within portions of the ADI and immediately adjacent to the ADI. These studies included the *Cultural Investigation for the Crazy Horse Switching Station Project, Monterey County, California* (Siskin et al. 2010), and *Cultural Resources Study for the Crazy Horse Canyon Project Modification 3 (Addendum), Monterey County, California* (DeBaker 2012) and *Cultural Resources Survey for the Moss Landing-Salinas-Soledad Transmission Line Replacement Project, Monterey County, California* (Linder et al., 2008).

Three historic period resources (cistern, boundary markers, and redwood post) have been recorded just outside the ADI (see Figure 1). These resources were documented during the initial field survey effort for this Project and were recorded on Department of Parks Recreation forms (DPR 253). Upon finalization of the project design it was determined that the resources were located outside of the ADI and no further work was conducted (Siskin et al., 2010) (see Figure 1). As a result of the Project background review and records search update, no cultural resources were identified within the ADI.

Survey Methods and Results

On April 28, 2014, GANDA archaeologists Cassidy DeBaker and Julian Plath conducted an intensive pedestrian survey of the three additional work areas: 1) Tower 10/50 Work Area; 2) Guard Structures; and 3) Landscaping Areas. All exposed ground soils and cut-banks were thoroughly inspected for the presence of archaeological cultural materials. C. DeBaker and J. Plath walked serpentine transects at 30-foot-wide intervals with close scrutiny given to areas with greater visibility. The ground surface was periodically trowelled to expose soils beneath heavy vegetation or duff. Pictures were taken using an 8.0 megapixel digital camera and notes were maintained throughout the survey. All areas were accessible by foot and survey coverage was 100 percent.

1). Tower 10/50 Work Area: The tower survey area consisted of an approximately 250' x 100' expanse surrounding Tower 10/50, which is subject to vegetation clearance and tree removal and an associated dirt access road (Photo 1). Tower 10/50 lies on an east facing slope at approximately 7 percent grade. Soils consisted of light tan to brown sandy silt and ground visibility averaged 10-15%, obscured by nonnative grasses, duff, and scrub oak. No cultural resources were observed.

2). Guard Structures: The guard structure survey area comprised an approximately 75' x 50' area located beneath the Moss Landing Crazy Horse Canyon power line on the west side of Crazy Horse Canyon Road (Photo 2). Soils consisted of highly disturbed, medium brown clay silt, and visibility was approximately 50%, minimally obscured by nonnative grasses and scrub oak. No cultural resources were observed.

3. Landscaping Areas: The landscaping areas were located at the on the north side of San Juan Road averaged 15% visibility, with slopes ranging from 5-25% (Photo 3). Visibility was obscured by low lying brush and grasses. No cultural resources were observed.

Conclusions

At this time, cultural resources identification is complete, no historical resources have been identified, and there are no additional recommendations beyond the mitigation measures described in the IS/MND and the *Crazy Horse Switching Station Project Monitoring Mitigation, Compliance, and Reporting Program (MMCRP)* (Panorama Environmental Inc. 2013) regarding the discovery of unanticipated cultural resources during construction (i.e., Mitigation Measure Cultural-2 and AMP Cultural-3).

Photo 1. Overview of Tower 10/50 (left), view west-northwest.

Photo 2. Overview of Guard Structure location west of Crazy Horse Canyon Road (background), view east.

Photo 3. Overview of Landscaping Areas from San Juan Grade Road, view west.

REFERENCES

DeBaker, C.
2012 *Cultural Resources Study for the Crazy Horse Canyon Project Modification 3 (Addendum), Monterey County, California.* Prepared by Garcia and Associates, San Anselmo, California. Prepared for TRC Solutions.

Linder, M., M., Linder, B., Price
2008 *Cultural Resources Survey for the Moss Landing-Salinas-Soledad Transmission Line Replacement Project, Monterey County, California.* Prepared for Pacific Gas and Electric Company, San Ramon, CA. Prepared by Applied EarthWorks, Inc., San Luis Obispo, CA.

Panorama Environmental Inc.
2013 *Crazy Horse Switching Station Project Monitoring Mitigation, Compliance, and Reporting Program, Monterey County, California.* Prepared for the California Public Utilities Commission.

RMT, Inc.
2011 *Crazy Horse Canyon Switching Station Project Final Initial Study/Mitigated Negative Declaration.* Prepared for the California Public Utilities Commission.

Siskin, B., DeBaker, C., Cox, B., Lang, J.
2010 *Cultural Investigation for the Crazy Horse Switching Station Project, Monterey County, California.* Prepared by Garcia and Associates, San Anselmo, California. Prepared for TRC Solutions.

Liver, Janet

Subject: FW: Crazy Horse: new pull site - cultural resources

From: Cassidy DeBaker [mailto:cdebaker@garciaandassociates.com]
Sent: Friday, August 08, 2014 1:22 PM
To: Liver, Janet; Barb Siskin
Cc: Joe Drennan; Cooney, Kathleen
Subject: RE: Crazy Horse: new pull site - cultural resources

Hi Janet-

This area was included in what we previously surveyed and there were no archaeological resources identified at the surface. Would you like me to update the memo/figures to reflect this?

Cassidy DeBaker, MA
Senior Archaeologist
Garcia and Associates
1 Saunders Avenue
San Anselmo, CA 94960

Office: 415-458-5803
Mobile:415-250-1687
cdebaker@garciaandassociates.com

From: Liver, Janet
Sent: Friday, August 01, 2014 10:58 AM
To: Barb Siskin; Cassidy DeBaker
Cc: Joe Drennan; Cooney, Kathleen
Subject: Crazy Horse: new pull site - cultural resources

Hi. PG&E wants to add a pull site to Crazy Horse. It is outside your ADI map below. It is ~0.3 acres. No grading required. We will be submitting a request to CPUC. Can you please confirm no cultural issues? Any work needed to be done to do this?

Thanks. Janet

New pull site:

Location circled in green below:

Janet

Janet Liver
Senior Project Manager

TRC
Results you can rely on

101 2nd Street, Suite 300, San Francisco, CA 94105
T: 650-477-0417 | F: 415-541-9378

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