

Vierra Reinforcement Project
Summary Form for Document Submittal
Attachment 1

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

Biological Resources-

As part of the project, PG&E proposed to implement APM BIO-1, which would require general protection measures to avoid impacts to special-status plants and their habitat. This was considered insufficient, as it did not include measures such as worker environmental training. The following two **Mitigation Measures (MM)** would supersede APM BIO-1: **MM 5.4-1** (Worker Environmental Awareness Program), and **MM 5.4-2** (preconstruction surveys and plant salvage opportunity). Salvage entails collection of seeds, parts such as bulbs or corms, or entire plants, at CDFW's discretion. With the implementation of **MMs 5.4-1** and **5.4-2**, the project would have no direct impacts on special-status plants.

Twenty-five special-status plant species have a potential to occur in the area around the new power line and Vierra Substation expansion. This included two federally- and state-listed plant species, large-flowered fiddleneck and palmate-bracted salty birds-beak; the state-listed Delta button-celery; the California Native Protection Act rare Mason's lilaeopsis; and 18 additional species listed as CRPR 1B.1 or 1B.2 (see **Table 5.4-2**). Surveyors conducted focused rare plant surveys in suitable habitat and found no special-status plant species within the Survey Area. Round-leaved filaree was considered to potentially occur in the project area based on the presence of potentially suitable habitat located at a staging area northeast of D'Arcy Parkway and South Howland Road. However, it was determined to be absent from the new power line and Vierra Substation expansion area based on results of targeted protocol-level surveys performed in 2017. Direct impacts in the form of habitat conversion may occur; these impacts would be avoided via implementation of **MM 5.4-1** and **5.4-2**. Indirect impacts would be avoided via implementation of **MM 5.4-1** and **5.4-2**.

With the inclusion of **MM 5.4-1, 5.4-2, 5.4-3**, APM BIO-2, and APM BIO-4, the project would avoid and mitigate potential biological impacts, and would be consistent with local plans and policies protecting biological resources. Thus, the construction, operation, or maintenance of the project would result in less than significant impacts to biological resources.

Potentially suitable foraging and nesting habitat for Swainson's hawk, burrowing owl, and white-tailed kite exists on and immediately adjacent to the site. PG&E's proposed measure (APM BIO-4) would reduce permanent direct impacts (conversion of habitat) to less than significant because it would incorporate appropriate habitat mitigation for these species, as specified by the City of Lathrop General Plan Policy 3 (Lathrop, 2004), and in accordance with the compensatory mitigation ratios of the Pacific Gas and Electric Operation and Maintenance Habitat Conservation Plan (PG&E O&M HCP) (PGE, 2007). **MM 5.4-3** prescribes pre-construction surveys and the use of construction buffers, among other protective measures to avoid and/or reduce indirect impacts to below the level of significance. Although the project is also within the plan boundaries of the PG&E O&M HCP, the project is not a covered activity as the HCP does not cover substation expansions that exceed 0.5-acre in size. However, mitigation has been adapted

to follow the outlined procedures of this plan (e.g., mitigation ratio per APM BIO-4), and therefore, impacts would be avoided or fully mitigated below the level of significance.

Cultural and Tribal Cultural Resources-

Records searches, literature reviews, and field surveys did not identify archaeological resources in the power line, Vierra Substation expansion, or remote substation modification footprints that could qualify as historical resources under CEQA. The prehistoric archaeological sensitivity assessments presented in the PEA and Data Response Set No. 3, assign a low to moderate probability for these types of resources to be buried in the project footprint. If construction activities were to damage, destroy, relocate, or alter a previously undiscovered resource, the impact would be significant.

Consultation with local Native American tribes indicates a higher sensitivity to buried resources than the sensitivity assessment suggests, demonstrating a need for additional information obtained from mechanical cores to assess the significance of any buried and presently unknown cultural or tribal cultural resources that could be discovered by construction activities.

Should inadvertent discoveries of buried archaeological resources occur during construction, implementation of APM CUL-1, APM CUL-2, and APM CUL-4, would not reduce impacts to a level that is less than significant because the resources can be easily damaged during construction. Implementation of **MM 5.5-1** would ensure that impacts to such resources would be less than significant. **MM 5.5-1** requires pre-construction extended Phase I archaeological testing in select locations to assess the locations of potential buried cultural or tribal cultural resources, and a Phase II evaluation if any deposits are uncovered. The impact to archaeological resources that could qualify as historical resources under CEQA would therefore be less than significant with implementation of these APMs and this mitigation measure. The remote microwave station updates would require no ground disturbance and would be limited to installation of dishes on existing towers at microwave stations; therefore, records searches, literature reviews, and field surveys were not conducted for those sites and no associated impacts to archaeological resources would occur.

Based on archaeological survey, records searches, and buried sensitivity analyses, human burials are not anticipated to occur within the new power line, Vierra Substation expansion, or remote substation modification project footprints. However, the possibility of discovering human remains during ground-disturbing activity cannot be entirely discounted. Consultation with Native American tribes indicates a higher sensitivity to buried human remains than the sensitivity assessment suggests, demonstrating a need for additional information obtained from mechanical cores to assess the significance of any buried and presently unknown cultural or tribal cultural resources that could be discovered by construction activities.

Should inadvertent discoveries of human remains occur during construction, implementation of APMs CUL-1, CUL-2, CUL-3, and CUL-4 would not reduce impacts to a level that is less than significant because human remains can be easily damaged during construction. Implementation of **MM 5.5-1** would ensure that potential impacts would be less-than-significant because damage to any human remains could be prevented by identifying any potential buried deposits prior to construction. **MM 5.5-1** requires pre-construction extended Phase I archaeological testing in select locations to assess the locations of potential buried cultural or tribal cultural resources, and a Phase II evaluation if any deposits are uncovered. The impact to any human remains during construction would be less than significant with implementation of these APMs and MM. The remote microwave station updates would require no ground disturbance and

would be limited to installation of dishes on existing towers at microwave stations; therefore, records searches, literature reviews, and field surveys were not conducted for those sites and no associated impacts related to disturbing human remains would occur.

Hazards and Hazardous Materials-

CPUC concluded that construction activities associated with the installation of the microwave dishes on the existing towers (located within a high Fire Hazard Severity Zone, within a state responsibility area, and adjacent to a very high Fire Hazard Severity Zone) would increase fire risk which include vehicle and equipment use (e.g. starting a vehicle on a grassy area), worker activities (e.g. workers smoking in a vegetative area), and any other activities that could ignite a fire in the nearby vegetation surrounding the two sites. In addition, Highland Peak microwave station is located within a CPUC Tier 3 high fire threat area, while the Mount Oso microwave station is located within a CPUC Tier 1 high fire threat area. This could result in a significant impact; however, with the implementation of **MM 5.9-1**, potential impacts associated with wildland fires would be less than significant.

A helicopter would be used to install stringing rollers on the tubular steel pole (TSP) cross-arms and to attach a pulling line between each TSP for the new transmission line to the expanded Vierra Substation. Helicopter use would be in accordance with all applicable federal, state, and local aviation rules and regulations. APM TRA-2 would require PG&E during construction to: comply with all applicable FAA regulations regarding air traffic within 2 miles of the project alignment; and coordinate all project helicopter operations with the local airport before and during project construction. However, construction-related helicopter activity should comply with all applicable FAA regulations regardless of its distance from the project alignment in order to ensure that potential safety hazard impacts from helicopter operations would be less than significant. **MM 5.17-2** would ensure that PG&E complies with all applicable FAA regulations regarding air traffic regardless of helicopter distance from the project alignment and the helicopter pilot would coordinate all helicopter operations with the local airport.

In addition, to avoid the potential for significant impacts associated with excessive nighttime helicopter noise, implementation of **MM 5.13-1** would limit all helicopter activity to daytime hours. Accordingly, with the implementation of **MMs 5.13-1** and **5.17-2**, the significant helicopter safety hazard and excessive noise impact for people working or residing in the area would be reduced to less than significant.

Noise-

Some nighttime construction activities may be required that could exceed the estimated nighttime ambient noise level at residences and exceed nighttime significance threshold of 70 dBA Leq at the closest residential receptor at 100 feet. This would result in a significant impact that could potentially affect human health and sleeping patterns.

While APM NOI-1 through APM NOI-6 require notification of residents in the event of nighttime construction and use of noise reduction practices, these APMs do not provide adequate recommendations to minimize the impacts of nighttime noise to less-than-significant levels. To supplement APM NOI-1 through APM NOI-6, **MM 5.13-1** is recommended. Nighttime work would be short-term. Per the requirements of **MM 5.13-1**, all nighttime work within 250 feet of residential areas would be required to implement noise-reducing practices to limit nighttime noise. **MM 5.13-1** requires use of low-noise equipment barriers and acoustic blankets, and using smart back-up alarms. This mitigation measure is effective in reducing noise. For example, acoustic blankets alone can reduce noise by 5 to 10 dBA. **MM 5.13-1** also describes a noise-complaint resolution process and provides for temporary relocation of

affected residents. APM NOI-1 through APM NOI-6 and **MM 5.13-1** apply to the new power line and Vierra Substation expansion along Vierra Road.

Transportation-

CPUC concluded that construction of the new power line could potentially cause significant hazards to the nearby rail system or to construction workers even with best management practices, as APM TRA-1 does not include details about the methods that would be used to reduce the potential for conflicts between construction and the rail line. However, with implementation of **MM 5.17-1** requiring PG&E submit and implement a Railroad Safety Plan for construction activities to address foot traffic, construction-related vehicles, and the transport of heavy/oversized loads over the Union Pacific railroad and spur railroad tracks, as well as safety measures to be employed during construction near the railroad tracks, impacts would be less than significant. **MM 5.17-1** also states that construction activities crossing or adjacent to rail lines shall follow best management practices, including compliance with the California Manual on Uniform Traffic Control Devices to minimize impacts to rail, and specifically lists encroachment permits from UPRR as a requirement for the Transportation Management Plan.

CPUC also concluded that the several 5-minute-long lane proposed closures on Nestle Way, Christopher Way, and D'Arcy Parkway over the course of one to two days for helicopter activity, as well as possible lane closures at pull sites for staging activities would potentially result in significant impacts to emergency access as the project does not include details about how emergency access would be maintained. MM TRA-1 would require PG&E to prepare a Transportation Management Plan that would include a lane closure/width reduction or traffic diversion plan, as required by local encroachment permits and plans for maintaining emergency vehicle access during lane closures. Finally, by requiring PG&E to obtain all the necessary transportation and/or encroachment permits (such as for transportation of oversized loads), **MM 5.15-1** would minimize service delays and hazards that could impede emergency vehicles. Implementation of **MM 5.15-1** would ensure that potential impacts to emergency access would be less than significant.

Wildfire-

Both of the microwave stations (Mount Oso and Highland Peak) reside within or are near a very high fire hazard severity zone found on a Cal Fire map. In addition, Highland Peak microwave station is located within a CPUC Tier 3 high fire threat area, while the Mount Oso microwave station is located within a CPUC Tier 1 high fire threat area. Absent mitigation, construction activities associated with installation of microwave dishes would increase fire risk and could result in a significant impact. These activities include vehicle and equipment use (e.g., vehicle engine starting or idling in a vegetated area), worker activities (e.g., workers smoking in a vegetated area), and any other activities that could ignite a fire in the nearby vegetation surrounding both tower sites. Implementation of **MM 5.9-1** would ensure that PG&E would prepare and implements fire hazard reduction measures to minimize the risk of fire and to address impacts should a fire occur. The fire hazard reduction measures would include worker training for reporting, controlling, and extinguishing incipient fires, providing access to fire extinguishers, and prohibiting certain activities that could pose a fire hazard. All of the items outlined above would ensure that construction workers are aware of the danger and with worker training, take the necessary steps to prevent a fire from occurring. Through the implementation of **MM 5.9-1**, potential impacts associated with wildfire would be less than significant with mitigation.