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## Report Memo

Date: October 20, 2014

To: Panoche Valley Solar LLC

Cc: Trisha Elizondo, Energy Renewal Partners  
Jennifer L. Kaminsky, Burns & McDonnell

From: James McRacken, Energy Renewal Partners

Subject: **Panoche Valley Solar Project Telecommunications Upgrades  
Modifications to PG&E Planned Disturbance Areas**

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Energy Renewal Partners (Energy Renewal) conducted field surveys from September 15 to September 18, 2014, based on information provided by Pacific Gas and Electric (PG&E) regarding planned areas of disturbance necessary for telecommunications upgrades on their Panoche-Moss Landing 230 kV transmission line for the Panoche Valley Solar Project. Results of this survey are provided in the Transmission Line Natural Assessment Report dated October 17, 2014. Since the time of the field work, PG&E has made modifications to several of the planned areas of disturbance, including:

- A new support helicopter landing zone and two guard structures have been added near Tower 224, located approximately 0.35 miles north of Study Area 1. These features are to protect an existing electrical distribution line along Little Panoche Road and facilitate optical ground wire (OPGW) pull across the road. The landing zone and guard structures are located within the Project Footprint which was surveyed during previous mobilizations. The guard structures will be placed near the disturbed road shoulder to minimize impacts;
- A new guard structure has been added near Tower 227, located within the Valley Floor Conservation Lands approximately 0.5 miles northeast of Study Area 1. This feature will protect an existing electrical distribution line during installation of the OPGW;
- The support helicopter landing zone was removed near Tower 234, located within the original Study Area 2, to avoid impacts within a Project BNLL buffer area;
- Temporary bridging may be needed near Tower 244, 247 and 249 to assist vehicles crossing the low areas when traveling to Tower 250. Bridging may include the temporary placement of steel plates on the crossing. Filling or dredging of areas within the Ordinary High Water Mark

(OHWM) is not planned for these temporary structures and nothing within the top of the banks will be disturbed to avoid a Lake and Streambed Alteration Agreement for state waters impacts;

- Guard structures were added near Towers 261 and 269 to protect an existing distribution line;
- A support helicopter landing zone was added near Tower 278 within the surveyed Study Area 7
- Two additional pull sites and one guard structure were added near Study Area 10, near Interstate 5 (I-5) to protect on/off ramps and facilitate OPGW pull across the interstate; and
- An alternative landing zone was added inside the Panoche Substation in the event that adding the landing zone to the east of the substation is not feasible.
- The existing microwave tower at the Panoche Mountain site may not meet PG&E requirements and a new tower may need to be constructed at this location.

Based on desktop review, as well as prior knowledge of the area from previous biological surveys, these modifications are located in areas that will likely have minimal impact to sensitive natural resources in the area. Furthermore, some of these modifications/additions will remain in a previously reviewed study area that was evaluated in September (i.e., the landing zone near Tower 278 and the alternate landing zone inside the Panoche Substation). Additionally, the removal of the support helicopter landing zone near Tower 234 eliminates the planned work from being located within a BNLL buffer zone and the proposed Valley Floor Conservation Lands.

The support helicopter landing zone and guard structures added near Tower 224, located within the Project Footprint, are located within a disturbed area (e.g. grazing, Little Panoche Road) that is dominated by non-native grass species. The guard structure added near Tower 227 is also within a heavily livestock grazed area dominated by non-native herbaceous plant species (similar to Study Areas 1-3). These previously surveyed areas are known to support GKR and other special status species (see Transmission Line Natural Assessment Report), however, none of these planned modifications are located within an existing BNLL buffer.

Locations for temporary bridging near Towers 244, 247, and 249 are situated outside of any previous study area within rolling hills dominated by non-native grasses and a natural scrub community (similar to study area 4). Impacts to sensitive resources will be minimized by prohibiting driving in the drainage channel. Impacts to sensitive species are not anticipated from these planned temporary bridges.

Additional guard structures near Towers 261 and 269 are located in areas seemingly similar, with respect to land cover, to those surveyed in September. These guard structures are located on land owned by the Bureau of Land Management (BLM) and are relatively close to Study Area 5 for the transmission line survey. The guard structure near Tower 261 is situated near a deep meander of Panoche Creek, with the creek located approximately 500 feet to the east and west of the planned site. The added guard structure near Tower 269 is located in an area that was traversed by foot in September while hiking to Study Area 5. This area is located within the Allscale scrub alliance and appears to be used recreationally by all-terrain vehicles. Based on findings at the nearby Study Area 5, the locations for these guard structures may be used by San Joaquin kit fox and other species noted in Appendix A of the Transmission Line Natural Assessment Report. Impacts to sensitive species are not anticipated from these planned guard structures.

The planned locations of two OPGW pull sites and a guard structure near the on/off ramps of I-5 are situated within a heavily disturbed area consisting of small plowed fields intersected by I-5 and West Panoche Road (similar to study area 10). Impacts to sensitive species are not anticipated from the planned guard structure and pull sites added near I-5.

The construction of the new microwave tower would be in an area that is already disturbed with similar equipment. Impacts to sensitive species are not anticipated from planned work in this existing disturbed area.

Even with the above stated changes to the disturbance areas, Energy Renewal believes that the sites chosen as temporary work areas for transmission line upgrades are situated such that temporary disturbances will have potentially minimal or no impact on special status species and regulated natural resources described in the Transmission Line Natural Assessment Report and this memo with appropriate avoidance and minimization measures.