

Responses to Comments from Pacific Gas & Electric Company (PG&E) Comment Set E1

E1-1 Thank you for your comment. PG&E will be responsible for upgrading its electrical system to connect the new solar project to PG&E's electrical grid. PG&E requests that the County clarify that there are no unavoidable significant impacts resulting from the PG&E Upgrades. Based on similar interconnection facilities for other solar projects, PG&E believes that the upgrades will have less than significant impacts.

The County and the Applicant have analyzed the PG&E Upgrades in relation to each CEQA environmental topic and confirms that there are no significant unavoidable impacts related solely to the PG&E Upgrades. The Executive Summary, Section ES.9, provides a summary of impacts for the Revised Solar Project and the PG&E Upgrades components separately.

E1-2 The comment states that because detailed engineering is not yet complete, the details provided in the SEIR for the switchyard and transmission line may change with final engineering. Specifically, tubular steel pole (TSP) heights could be approximately 135 feet¹

The Final SEIR includes the following modifications to the Project Description, Section B.6.2, as a result of the comment:

As shown in Figure B-5, it is anticipated that four pairs of new tubular steel poles (TSPs) would be required: two pairs within the existing transmission right-of-way and one pair on either side of the PG&E ~~switchyard~~ switching station. There would be four temporary work areas to allow for construction of up to ~~812~~ approximately 85135-foot tall tubular steel poles (TSPs).

E1-3 The comment clarifies that the Las Aguilas Switching Station will become a permanent asset of PG&E's electric transmission system rather than being removed and "decommissioned" as currently implied in Section B.9 of the Draft SEIR. The Final SEIR, Section B.9 has been modified to reflect the requested clarification as follows:

As stated in the 2010 Final EIR, the ~~switchyard~~ switching station would be owned and operated by PG&E. The switching station will become a permanent asset of PG&E's electrical transmission system. Any decommissioning plan for the solar project would exclude PG&E-owned facilities. and decommissioning would occur per the utility specifications at the time.

E1-4 PG&E provided clarification regarding updated design. The updated design includes installation of All-Dielectric Self Supporting (ADSS) fiber optic cable on approximately 12 wood

¹ The original comment letter inadvertently stated TSP heights might be approximately 100 feet in height; however, a subsequent email communication was sent from Michael Calvillo of PG&E (dated February 17) to Byron Turner of the County of San Benito and Susan Lee of Aspen Environmental, the County's consultant. The email corrected the error and stated the tower heights could actually be 120 feet in height. This was further refined through personal communication on March 16, 2015 with Michael Calvillo of PG&E and the Applicant that the TSPs could be up to 135 feet in height.

distribution poles, which will be replaced in the same location as existing poles, to handle the additional load of the ADSS. Although 12 poles will be replaced, this approach will avoid having to install new poles and would result in fewer impacts. The text of the Final EIR (Section B.11.1.2 under the heading “Crossing of 500 kV Lines”) has been modified to reflect the approach proposed in the comment as follows:

The existing 230 kV transmission line crosses under two existing 500 kV transmission lines about 1.5 miles west of the I-5 crossing. At this location, an approximately 4,650-foot section will require the installation of All-Dielectric Self-Supporting (ADSS) fiber optic cable on approximately twelve existing wood distribution poles located to the north of the 230 kV transmission line. The existing poles will be replaced to handle the additional load of the ADSS. The distribution poles require the installation of approximately nine permanent wood poles are within the existing ROW and on land currently used for agricultural purposes. At this crossing, PG&E would splice in All-Dielectric Self-Supporting (ADSS) fiber optic cable from the 230 kV towers to the east and west sides of the 500 kV transmission line corridor and, connect the ADSS to the existing distribution line and then attach the ADSS to the twelve replaced wood poles. attach the ADSS to the nine new wood poles. The ADSS would be installed in place OPGW for this 4,650-foot section. To replace the new poles, approximately would be located at a 30- to 40-foot offset to the existing 230 kV centerline and within the ROW. To install the poles, a 30-foot by 40-foot work areas would be required to accommodate one crew truck and a trailer truck to bring each pole to the site, and a line truck to remove the existing poles and replace it with a new pole auger a hole about 8 feet deep and 2 feet wide. From the easternmost 230 kV tower along this section to the distribution pole, the ADSS will be trenched in underground approximately 365 feet within an existing dirt road. The trench would be up to 24” wide and up to 8’ deep to avoid any conflict with agricultural land uses. From westernmost 230 kV tower along this section to the distribution pole, the ADSS will run overhead approximately 100 feet. Removed poles will be disposed of in accordance with applicable laws.

E1-5 and E1-6 Comments E1-5 and E1-6 are addressed in this response.

Because PG&E’s interconnection facilities may be exempt from formal permitting requirements of the CPUC, the following revisions to the SEIR have been made.

Section A.5.2 The CPUC ~~must approve~~ has jurisdiction over any facility that will be transferred to and/or owned and maintained by an investor owner utility such as Pacific Gas & Electric Company (PG&E).

Section C.6.3.5 The County recommends that PG&E implement and that the CPUC ~~adopt~~ enforce AMM BR-PGE-1 through BR-PGE-9 to minimize general environmental impacts.

E1-7 through E1-11 Comments E1-7 through E1-11 are addressed in this response.

PG&E requested minor modifications to the Avoidance and Minimization Measures, AMM BR-PG&E-3, AMM BR-PG&E-16, AMM BR-PGE-17, AMM CR-3. In addition, PG&E has requested the addition of a new AMM, AMM BR-PGE-19.

The County has revised the Draft SEIR to reflect the requested changes and additions to all of the AMMs, except AMM BR-PGE-19. Regarding AMM BR-PGE-19, the County recognizes that all Biological AMMs are subject to further refinement through conditions developed in subsequent permitting the following changes have been made to the Biological AMMs. However, rather than adding AMM BR-PGE-19, which creates some uncertainty regarding implementation of the other recommended AMMs, the County recommends that PG&E implement, and that the CPUC can and should adopt, all of the AMMs (as revised below) as the minimum protection afforded to each resource. Note that only relevant portions of the modified AMMs are included below.

AMM BR-PGE-3 **Work during daylight hours.** Work will occur only during daylight hours, unless required to occur at night ~~by permit or ordinance~~ due to line clearances for worker safety.

AMM BR-PGE-16 **Conduct preconstruction surveys for active Swainson's hawk nests and implement avoidance measures if necessary.** If construction activities are anticipated to occur during the nesting season for Swainson's hawks (generally March through July), PG&E will retain a qualified wildlife biologist to conduct preconstruction surveys within 0.50 miles of construction activities that occur within or near suitable breeding habitat for nesting Swainson's hawks. The biologist will also consult with CDFW and species experts to determine if there are any known active Swainson's hawk nests or traditional territories within 0.50 miles of the work areas. ~~If no active Swainson's hawk nests are detected, a report documenting survey methods and findings will be submitted to CDFW, and no further mitigation is required.~~

If an active Swainson's hawk nest occurs within 0.50 miles of a planned work area, a 0.50-mile restricted activity buffer will be established around the nest. Biologists will monitor the nest and coordinate with local CDFW representatives to designate nest-specific areas of avoidance and restricted activities based upon the location of the nest relative to project activities and the type and duration of construction activities planned during the nesting season.

AMM-BR-PGE-17 **Conduct preconstruction surveys and avoidance of active western burrowing owl burrows.** ~~CDFW (2012) recommends that preconstruction surveys be conducted at all work areas (except paved areas) in project study areas and in a 250-foot wide buffer zone around the work areas to locate active burrowing owl burrows. PG&E will retain a qualified biologist to conduct preconstruction surveys for active burrows no more than 30 days prior and no less than 14 days prior to the start of construction in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW, 2012) according to the CDFW guidelines. If no burrowing owls are detected, a letter report documenting survey methods and findings will be submitted to CDFW, and no further mitigation is required.~~

If western burrowing owls are present at the site, a qualified biologist will ~~work with O&M staff to determine whether an exclusion zone of 160 feet during the non-nesting season and 250 feet during the nesting season can be established~~ establish an exclusion zone in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). If it cannot, an experienced burrowing owl biologist will develop a site-specific plan (i.e., a plan that considers the type and extent of the proposed activity, the duration and timing of the activity, the sensitivity and habituation of the owls, and the dissimilarity of the proposed activity with background activities) to minimize the potential to affect the reproductive success of the owls. If a biologist experienced with burrowing owl determines the relocation of owls is necessary, a passive relocation effort may be conducted as described below, in coordination with CDFW as appropriate. During the nonbreeding season (generally 1 September–31 January), a qualified biologist may passively relocate burrowing owls found within construction areas. Prior to passively relocating burrowing owls, a Burrowing Owl Exclusion Plan shall be prepared by a qualified biologist in accordance with Appendix E of the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). The Burrowing Owl Exclusion Plan shall be submitted to the CDFW for review ~~and to the County for approval prior to implementation as required~~.

The selected monitors do not need to meet the Secretary of the Interior Professional Qualifications Standards, but their supervisor does. So the following minor changes to AMM CR-3 have been made to the Final SEIR.

AMM CR-3

Cultural construction monitoring. A qualified archaeologist field technician working with and reporting to an ~~professional~~ archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards will monitor all project-related excavation that is within an area of moderate to high sensitivity for prehistoric or historical buried resources. This shall include monitoring areas within 167 feet (50 meters) of recorded or previously identified prehistoric and historical-era sites or features, AMM CUL-3 will be guided by an Archaeological Monitoring and Inadvertent Discovery Plan, which will include the framework for evaluation and treatment of any unanticipated discoveries described in AMM CR-4.