



SAN FRANCISCO PLANNING DEPARTMENT

CEQA CATEGORICAL EXEMPTION FORM

PROJECT NAME: Don Pedro Reservoir Electrical Transmission Line Crossing

PROJECT LOCATION: Don Pedro Reservoir, Tuolumne County

CASE NUMBER: 2014-002073ENV

PROJECT TYPE: New Facility Replacement Facility/Equipment
 Repair/Maintenance/Upgrade Other: _____

1. EXEMPTION CLASS

- Class 1: Existing Facilities
- Class 2: Replacement or Reconstruction
- Class 3: New Construction or Conversion of Small Structures
- Class 6: Information Collection
- Other: _____

2. CEQA Impacts

For any box checked below, refer to the attached Environmental Evaluation Application with supporting analysis and documentation.

- Air Quality: Would the project affect sensitive receptors (specifically schools, colleges, universities, day care facilities, hospitals, residential dwellings, or senior-care facilities)?
- Noise: Would the project conflict with the applicable local Noise Ordinance?
- Hazardous Materials: Would the project be located on a site included on any list compiled pursuant to Section 65962.5 of the Government Code, or impact an area with known hazardous materials such as a former gas station, auto repair, dry cleaners, heavy manufacturing use, or site with underground storage tanks?
- Soils Disturbance/Modification: Would the project result in soil disturbance greater than 2 feet below grade in archeological sensitive area or 8 feet in a non-archeological sensitive area?
- Biology: Would the project have the potential to impact sensitive species, rare plants or designated critical habitat? Is the project consistent with the applicable tree protection ordinance?

Visual: Is the project located within or adjacent to a designated scenic roadway, or would the project have the potential to impact scenic resources that are visible from public locations?

Transportation: Would project construction or operation have the potential to substantially interfere with existing traffic patterns or transit operations.

Historical Resources: Is the project located on a site with a known or potential historical resource?

Other: _____

3. CATEGORICAL EXEMPTION DETERMINATION

Further Environmental Review Required.

Notes: _____

No Further Environmental Review Required. Project is categorically exempt under CEQA.



Digitally signed by Chris Kern
DN: dc=org, dc=sfgov, dc=cityplanning,
ou=CityPlanning, ou=Environmental
Planning, cn=Chris Kern,
email=chris.kern@sfgov.org
Date: 2014.11.25 13:43:45 -08'00'

11/25/14

Planner's Signature

Date

Chris Kern, Senior Environmental Planner

Name, Title

Project Approval Action: Approval to award construction contract

Once signed and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter 31 of the Administrative Code.



SAN FRANCISCO PLANNING DEPARTMENT

ENVIRONMENTAL EVALUATION APPLICATION COVER MEMO - PUBLIC PROJECTS ONLY

In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination can only be filed within 30 days of the project receiving the first approval action.

Please attach this memo along with all necessary materials to the Environmental Evaluation Application.

Project Address and/or Title:	SFPUC HHWP Don Pedro Reservoir Electric Transmission Line Crossing (HH-960)
Funding Source (MTA only):	
Project Approval Action:	Approval to award the construction contract would require a public hearing.
Will the approval action be taken at a noticed public hearing?	<input checked="" type="checkbox"/> YES* <input type="checkbox"/> NO
* If YES is checked, please see below.	

IF APPROVAL ACTION IS TAKEN AT A NOTICED PUBLIC HEARING, INCLUDE THE FOLLOWING CALENDAR LANGUAGE:

End of Calendar: CEQA Appeal Rights under Chapter 31 of the San Francisco Administrative Code If the Commission approves an action identified by an exemption or negative declaration as the Approval Action (as defined in S.F. Administrative Code Chapter 31, as amended, Board of Supervisors Ordinance Number 161-13), then the CEQA decision prepared in support of that Approval Action is thereafter subject to appeal within the time frame specified in S.F. Administrative Code Section 31.16. Typically, an appeal must be filed within 30 calendar days of the Approval Action. For information on filing an appeal under Chapter 31, contact the Clerk of the Board of Supervisors at City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102, or call (415) 554-5184. If the Department’s Environmental Review Officer has deemed a project to be exempt from further environmental review, an exemption determination has been prepared and can be obtained on-line at <http://sf-planning.org/index.aspx?page=3447>. Under CEQA, in a later court challenge, a litigant may be limited to raising only those issues previously raised at a hearing on the project or in written correspondence delivered to the Board of Supervisors, Planning Commission, Planning Department or other City board, commission or department at, or prior to, such hearing, or as part of the appeal hearing process on the CEQA decision.

Individual calendar items: This proposed action is the Approval Action as defined by S.F. Administrative Code Chapter 31.

THE FOLLOWING MATERIALS ARE INCLUDED:

- 2 sets of plans (11x17)
- Project description
- Photos of proposed work areas/project site
- Necessary background reports (specified in EEA)
- MTA only: Synchro data for lane reductions and traffic calming projects

APPLICATION FOR Environmental Evaluation

1. Owner/Applicant Information

PROPERTY OWNER'S NAME: San Francisco Public Utilities Commission, Hetch Hetch Water and Power	
PROPERTY OWNER'S ADDRESS: 525 Golden Gate Avenue, 13th Floor San Francisco, CA 94102-3220	TELEPHONE: (415) 554-3155
	EMAIL: www.sfwater.org

APPLICANT'S NAME: San Francisco Public Utilities Commission, Bureau of Environmental Management Same as Above <input type="checkbox"/>	
APPLICANT'S ADDRESS: 525 Golden Gate Avenue, Sixth Floor San Francisco, CA 94102-3220	TELEPHONE: (415) 934-5700
	EMAIL: BEM@sfwater.org

CONTACT FOR PROJECT INFORMATION: Barry Pearl, AICP, MPA, Senior Environmental Project Manager Same as Above <input type="checkbox"/>	
ADDRESS: 525 Golden Gate Avenue, Sixth Floor San Francisco, CA 94102-3220	TELEPHONE: (415) 551-4573
	EMAIL: bpearl@sfwater.org

2. Location and Classification

STREET ADDRESS OF PROJECT: N/A	ZIP CODE: 95329
CROSS STREETS: N/A	

ASSESSORS BLOCK/LOT: N/A /	LOT DIMENSIONS:	LOT AREA (SQ FT):	ZONING DISTRICT:	HEIGHT/BULK DISTRICT:
COMMUNITY PLAN AREA (IF ANY):				

3. Project Description

(Please check all that apply) <input type="checkbox"/> Change of Use <input type="checkbox"/> Change of Hours <input type="checkbox"/> New Construction <input type="checkbox"/> Alterations <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Other Please clarify: Electric Transmission Towers	ADDITIONS TO BUILDING: <input type="checkbox"/> Rear <input type="checkbox"/> Front <input type="checkbox"/> Height <input type="checkbox"/> Side Yard	PRESENT OR PREVIOUS USE: Hetch Hetchy Electric Transmission System
		PROPOSED USE: Hetch Hetchy Electric Transmission System
	BUILDING APPLICATION PERMIT NO.: N/A	DATE FILED:

4. Project Summary Table

If you are not sure of the eventual size of the project, provide the maximum estimates.

	EXISTING USES:	EXISTING USES TO BE RETAINED:	NET NEW CONSTRUCTION AND/OR ADDITION:	PROJECT TOTALS:
PROJECT FEATURES				
Dwelling Units	N/A	N/A	N/A	N/A
Hotel Rooms	N/A	N/A	N/A	N/A
Parking Spaces	N/A	N/A	N/A	N/A
Loading Spaces	N/A	N/A	N/A	N/A
Number of Buildings	N/A	N/A	N/A	N/A
Height of Building(s)	N/A	N/A	N/A	N/A
Number of Stories	N/A	N/A	N/A	N/A
Bicycle Spaces	N/A	N/A	N/A	N/A
GROSS SQUARE FOOTAGE (GSF)				
Residential	N/A	N/A	N/A	N/A
Retail	N/A	N/A	N/A	N/A
Office	N/A	N/A	N/A	N/A
Industrial	N/A	N/A	N/A	N/A
PDR Production, Distribution, & Repair	N/A	N/A	N/A	N/A
Parking	N/A	N/A	N/A	N/A
Other (Specify Use)	N/A	N/A	N/A	N/A
TOTAL GSF	N/A	N/A	N/A	N/A

Please provide a narrative project description that summarizes the project and its purpose or describe any additional features that are not included in this table. Please list any special authorizations or changes to the Planning Code or Zoning Maps if applicable.

Four electric transmission lines operated and maintained by the SFPUC Power Enterprise that cross Don Pedro Reservoir in Tuolumne County do not meet the minimum clearance above the water level required by the National Electrical Safety Code (NESC) and the California Public Utilities Commission General Order Number 95 (dated January 2006) (See Basis of Design Memorandum prepared for the SFPUC Hetch Hetchy Water and Power by Black & Veatch, dated November 5, 2013). The four electric transmission lines (Newark Line – Circuits 3 and 4, and the Intake-Warnerville Line – Circuits 5 and 6) between Towers 58N and 64N and 258S and 264S must be raised to meet the minimum standards.

The proposed Project would involve construction of four steel monopoles, either 175 feet tall (replacement for towers 58N and 64N) or 180 feet tall (replacement for towers 258S and 264S) to replace the existing lattice style towers, which are 105 to 110 feet tall above grade. The monopoles would taper from bottom to top with a base diameter of approximately eight-feet and 2-1/2 to 3foot diameter at the top. See attached design drawings. Once the transmission lines are restrung from the existing towers to the replacement towers the existing lattice towers would be disassembled and removed.

Drilled piers 12 feet in diameter embedded 29 feet into the ground would support each monopole (See drawing S-9020, Drilled Pier Foundations.). Although not anticipated, depending on the nature of the substrate limited blasting may be necessary to excavate the foundations for the monopoles.

Historic Resource Evaluation (Item 2) not required because transmission line towers are similar to hundreds in existence, Shadow Analysis (Item 5) and Wind Analysis (Item 6) not required because project is located in Tuolumne County not within San Francisco City Limits.

5. Environmental Evaluation Project Information

1. Would the project involve a major alteration of a structure constructed 45 or more years ago or a structure in a historic district? YES NO

If yes, submit the *Supplemental Information for Historic Resource Evaluation* application.

2. Would the project involve demolition of a structure constructed 45 or more years ago or a structure located in a historic district? YES NO

If yes, a historic resource evaluation (HRE) report will be required. The scope of the HRE will be determined in consultation with Preservation Planning staff.

3. Would the project result in excavation or soil disturbance/modification? YES NO

If yes, please provide the following:

Depth of excavation/disturbance below grade (in feet): 29 feet

Area of excavation/disturbance (in square feet): ~452

Amount of excavation (in cubic yards): ~486

Type of foundation to be used (if known) and/or other information regarding excavation or soil disturbance modification:
Drilled piles/piers

Note: A geotechnical report prepared by a qualified professional must be submitted if one of the following thresholds apply to the project:

- The project involves a lot split located on a slope equal to or greater than 20 percent.
- The project is located in a seismic hazard landslide zone or on a lot with a slope average equal to or greater than 20 percent and involves either
 - excavation of 50 or more cubic yards of soil, or
 - building expansion greater than 1,000 square feet outside of the existing building footprint.

A geotechnical report may also be required for other circumstances as determined by Environmental Planning staff.

4. Would the project involve any of the following: (1) construction of a new building, (2) relocation of an existing building, (3) addition of a new dwelling unit, (4) addition of a garage or parking space, (5) addition of 20 percent or more of an existing building's gross floor area, or (6) paving or repaving of 200 or more square feet of an existing building's front setback? YES NO

If yes, please submit a *Tree Planting and Protection Checklist*.

5. **Would the project result in any construction over 40 feet in height?** YES NO

If yes, please submit a *Shadow Analysis Application*. This application should be filed at the PIC and should not be included with the Environmental Evaluation Application. (If the project already underwent Preliminary Project Assessment, this application may not be needed. Please refer to the shadow discussion in the PPA letter.)

6. **Would the project result in a construction of a structure 80 feet or higher?** YES NO

If yes, an initial review by a wind expert, including a recommendation as to whether a wind analysis is needed, may be required, as determined by Planning staff. (If the project already underwent Preliminary Project Assessment, please refer to the wind discussion in the PPA letter.)

7. **Would the project involve work on a site with an existing or former gas station, auto repair, dry cleaners, or heavy manufacturing use, or a site with underground storage tanks?** YES NO

If yes, please submit a Phase I Environmental Site Assessment (ESA) prepared by a qualified consultant. If the project is subject to Health Code Article 22A, Planning staff will refer the project sponsor to the Department of Public Health for enrollment in DPH's Maher program.

8. **Would the project require any variances, special authorizations, or changes to the Planning Code or Zoning Maps?** YES NO

If yes, please describe.

9. **Is the project related to a larger project, series of projects, or program?** YES NO

If yes, please describe.

Estimated Construction Costs

TYPE OF APPLICATION:	
N/A	
OCCUPANCY CLASSIFICATION:	
N/	
BUILDING TYPE:	
N/A	
TOTAL GROSS SQUARE FEET OF CONSTRUCTION:	BY PROPOSED USES:
N/A	Electric Power Transmission Lines Towers
ESTIMATED CONSTRUCTION COST:	
N/A	
ESTIMATE PREPARED BY:	
FEE ESTABLISHED:	

Applicant's Affidavit

Under penalty of perjury the following declarations are made:

- a: The undersigned is the owner or authorized agent of the owner of this property.
- b: The information presented is true and correct to the best of my knowledge.
- c: Other information or applications may be required.

Signature: _____



Date: 11/17/2014 _____

Print name, and indicate whether owner, or authorized agent:

Irina P. Torrey, AICP, Manager, SFPUC BEM

Owner / Authorized Agent (circle one)

Environmental Evaluation Application Submittal Checklist

APPLICATION MATERIALS	PROVIDED	NOT APPLICABLE
Two originals of this application signed by owner or agent, with all blanks filled in.	<input type="checkbox"/>	
Two hard copy sets of project drawings in 11" x 17" format showing existing and proposed site plans with structures on the subject property and on immediately adjoining properties, and existing and proposed floor plans, elevations, and sections of the proposed project.	<input type="checkbox"/>	
One CD containing the application and project drawings and any other submittal materials that are available electronically. (e.g., geotechnical report)	<input type="checkbox"/>	
Photos of the project site and its immediate vicinity, with viewpoints labeled.	<input type="checkbox"/>	
Check payable to San Francisco Planning Department.	<input type="checkbox"/>	
Letter of authorization for agent.	<input type="checkbox"/>	<input type="checkbox"/>
<i>Supplemental Information for Historic Resource Evaluation</i> , as indicated in Part 5 Question 1.	<input type="checkbox"/>	<input type="checkbox"/>
<i>Historic Resource Evaluation</i> , as indicated in Part 5 Question 2.	<input type="checkbox"/>	<input type="checkbox"/>
Geotechnical report, as indicated in Part 5 Question 3.	<input type="checkbox"/>	<input type="checkbox"/>
<i>Tree Planting and Protection Checklist</i> , as indicated in Part 5 Question 4.	<input type="checkbox"/>	<input type="checkbox"/>
Phase I Environmental Site Assessment, as indicated in Part 5 Question 7.	<input type="checkbox"/>	<input type="checkbox"/>
Additional studies (list).	<input type="checkbox"/>	<input type="checkbox"/>

For Department Use Only

Application received by Planning Department:

By: _____

Date: _____



FOR MORE INFORMATION:
Call or visit the San Francisco Planning Department

Central Reception
1650 Mission Street, Suite 400
San Francisco CA 94103-2479

TEL: **415.558.6378**
FAX: **415 558-6409**
WEB: **<http://www.sfplanning.org>**

Planning Information Center (PIC)
1660 Mission Street, First Floor
San Francisco CA 94103-2479

TEL: **415.558.6377**
*Planning staff are available by phone and at the PIC counter.
No appointment is necessary.*



November 17, 2014

Mr. Timothy Johnston, MP, Environmental Planner
 Environmental Planning Division
 San Francisco Planning Department
 1650 Mission Street, Fourth Floor
 San Francisco, CA 94103

RE:

Don Pedro Reservoir Crossing
 115kV & 230 kV Transmission Lines
 Contract Number HH-960
 CEQA Exemption Request

Dear Timothy:

The San Francisco Public Utilities Commission (SFPUC) requests review of the proposed 115 kV and 230 kV Transmission Lines Don Pedro Reservoir Crossing Project under the California Environmental Quality Act (CEQA). SFPUC requests Environmental Planning Division (EP) concurrence that the proposed Project is categorically exempt under CEQA Section 15302, Class 2 (**Replacement or Reconstruction**). Class 2 consists of the replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. Subsection (d) provides an exemption for the replacement or reconstruction of existing utility systems and/ or facilities involving negligible or no expansion of capacity.

The following analysis demonstrates the proposed Project would not result in adverse environmental effects and provides support for our recommendation that the proposed activities are categorically exempt under CEQA. The Project would be conducted in compliance with applicable federal, State, and local regulations and under contractual provisions prohibiting work in violation of applicable regulations and plans.

BACKGROUND

The Hetch Hetchy Power system is composed of three hydroelectric powerhouses with a combined total hydroelectric output of over 400 megawatts. Energy is transmitted to the San Francisco Bay area along City-

- Edwin M. Lee
Mayor
- Ann Moller Caen
President
- Francesca Viotor
Vice President
- Vince Courtney
Commissioner
- Anson Moran
Commissioner
- Harlan L. Kelly, Jr.
General Manager



Mr. Timothy Johnston, MP, Environmental Planner
Environmental Planning Division, San Francisco Planning Department
Don Pedro Reservoir Crossing 115kV & 230 kV Transmission Lines
(Contract Number HH-960)
CEQA Exemption Request
November 17, 2014
Page 2 of 10

owned transmission lines from Tuolumne County to the City of Fremont in Alameda County.

PROJECT DESCRIPTION

Four electric transmission lines operated and maintained by the SFPUC Power Enterprise that cross Don Pedro Reservoir in Tuolumne County do not meet the minimum clearance above the water level required by the National Electrical Safety Code (NESC) and the California Public Utilities Commission General Order Number 95 (dated January 2006) (See Basis of Design Memorandum prepared for the SFPUC Hetch Hetchy Water and Power by Black & Veatch, dated November 5, 2013). The four electric transmission lines (Newark Line – Circuits 3 and 4, and the Intake-Warnerville Line – Circuits 5 and 6) between Towers 58N and 64N and 258S and 264S must be raised to meet the minimum standards.

The proposed Project would involve construction of four steel monopoles, either 175 feet tall (replacement for towers 58N and 64N) or 180 feet tall (replacement for towers 258S and 264S) to replace the existing lattice style towers, which are 105 to 110 feet tall above grade. The monopoles would taper from bottom to top with a base diameter of approximately eight-feet and 2-1/2 to 3foot diameter at the top. See attached design drawings.

Once the transmission lines are restrung from the existing towers to the replacement towers the existing lattice towers would be disassembled and removed.

Drilled piers 12 feet in diameter embedded 29 feet into the ground would support each monopole (See drawing S-9020, Drilled Pier Foundations.). Although not anticipated, depending on the nature of the substrate limited blasting may be necessary to excavate the foundations for the monopoles.

Neighboring property owners and residents, particular along Kelly Grade Road and Marsh's Flat Road on the east side of the Reservoir, would be notified of the scheduled movement of large pieces of equipment and vehicles along those roads based on the possibility that slow driving speeds necessary for safe operation of the vehicles delivering the equipment and materials may increase travel time on those roads experienced by the neighboring property owners and residents.

Biological surveys for both special status plant species and animals (in particular nesting birds) would be conducted shortly in advance of the start of construction as described in the Biological Resources Section below.

Project Duration and Schedule

Construction would require approximately 155 work days (approximately seven months), of which approximately 40 days would be required to construct towers 58N and 64N and 25 days to construct towers 258S and 264S. Construction is expected to begin in June 2015 with completion in March 2016. Construction work would be conducted between 7:00 a.m. and 5:00 p.m. Monday through Friday. Evening and weekend work would not be required.

Project Equipment and Work Crew

Work crews typically would include about five to seven members. Two to four pickup trucks would be used to transport work crew members to and from the project sites each day. Equipment would include a drill rig and concrete trucks to excavate and pour the foundation for the towers. Flatbed trucks would deliver the towers sections to be assembled on-site. Cranes would be used to assemble the towers at each location and disassemble and remove the lattice towers. A helicopter may be used to string the transmission lines.

Site Access and Staging

Proposed staging areas are identified on the attached drawings. All sites would be accessible over existing roadways.

SFPUC Standard Construction Measures

The SFPUC requires the Standard Construction Measures issued February 7, 2007 (on file at EP) be implemented as applicable, for all of its projects. Those measures applicable to this Project are included in the Project, as detailed below.

ENVIRONMENTAL INFORMATION

Aesthetics

While the replacement transmission lines towers would be taller (approximately 175 to 180 feet versus 105 to 110 feet tall) than the existing, the replacement towers would be located within approximately 50 feet of the existing towers,

Mr. Timothy Johnston, MP, Environmental Planner
Environmental Planning Division, San Francisco Planning Department
Don Pedro Reservoir Crossing 115kV & 230 kV Transmission Lines
(Contract Number HH-960)
CEQA Exemption Request
November 17, 2014
Page 4 of 10

which would be removed. The towers are located in a very isolated area and are not visible from any of the major roadways (State Route 49 or State Route 120) in the vicinity. The replacement towers would be visible to infrequent recreational users of Don Pedro Reservoir (houseboat and speedboat users) and to the few residents living around the Reservoir in the Project area.

The replacement towers are slender, approximately 2-1/2 to 3 feet in diameter at the top and approximately 8 feet in diameter at the bottom, and may be painted an appropriate color to blend in with the sky.

Therefore adverse effects to the aesthetic environment are not anticipated.

Air Quality

Although the total construction duration would be approximately 10 months (including necessary line outages and time to string the transmission lines), excavation of the towers supports and construction of the monopoles would be less than three months (86 calendar days). Based on the limited use of equipment and vehicles, adverse effects to air quality are not anticipated.

No sensitive receptors are within 1,000 feet of the project sites. A single residence on the west side of the Reservoir is approximately 0.2 mile from the nearest project site, approximately 1,050 feet away.

The SFPUC and the construction contractor would implement Standard Construction Measure Number 3 including preparation of a dust control plan and implementation of erosion and sedimentation controls to avoid generating fugitive dust during Project construction.

In addition, Tuolumne County has not established regulations for construction emissions. Therefore, the proposed Project would not be subject to the Bay Area Quality Management District CEQA Air Quality Guidelines related to assessment of local community risk and hazard impacts for both single source and cumulative effects.

Archaeological and Historical Resources

An archaeological survey of the proposed tower locations and staging areas was conducted by SFPUC staff archeologist Sally Morgan (electronic mail memorandum, November 2014, on file at the SFPUC Bureau of Environmental Management). The survey included a complete intensive survey of the work

areas for the new and existing towers. Most of the proposed staging areas consist of spoils dumps from construction of SFPUC's Foothill Tunnel. As the potential presence of historic features or archaeological deposits on the spoils dumps was considered extremely low, only a cursory archaeological survey was conducted for these staging areas. However, a complete intensive archaeological survey was conducted of the small road shoulder staging areas. No historic or prehistoric features or deposits were found. Based on the shallow soils over the limestone substrate at the proposed monopoles locations, the potential for buried archaeological deposits also appears to be slight..

The existing lattice towers were constructed at two different times. The northern towers (Circuits 3 and 4, towers 58N and 64N) were constructed in 1956 and are therefore 58 years old. The southern towers (Circuits 5 and 6, towers 258S and 264S) were constructed in 1969 and are therefore 45 years old. None of the transmission lines and support towers have been identified as potential historic resources. The lattice towers proposed for disassembly and removal do not appear to qualify as historical resources. The primary reason is that the simple steel lattice towers are examples of a common resource type, represented by hundreds of identical examples along these transmission lines. Replacement of four towers between the Town of Moccasin and the City of Fremont, a distance of more than 100 miles, would not adversely affect the historical integrity of the transmission lines.

Therefore the proposed Project would not adversely affect cultural resources.

Biological Resources

At the request of the SFPUC, RMC Water & Environment and BioMaAS, Inc. prepared a biological constraints analysis of the project sites (copy attached dated September 20, 2014).

BioMaAS identified a number of special status plant and animal species that could be present on the Project sites or in the Project vicinity. Because the sites were not surveyed during plant blooming season (late winter or early spring), additional surveys were recommended in the spring prior to construction to confirm that special status plant species (*Balsamoriza macrolepis*, *Clarkia biloba ssp. australis*, and *Lupinus spectabilis*) are not present at any of the Project sites, if ground-disturbing work is going to be conducted during the blooming season.

Mr. Timothy Johnston, MP, Environmental Planner
Environmental Planning Division, San Francisco Planning Department
Don Pedro Reservoir Crossing 115kV & 230 kV Transmission Lines
(Contract Number HH-960)
CEQA Exemption Request
November 17, 2014
Page 6 of 10

In addition, BioMaAS identified two old raptor nests, likely osprey, on towers 58N and 64N which would require SFPUC coordination with the USFWS migratory bird office for approval to remove the nests outside of nesting season before work begins. If work cannot be restricted to outside of bird nesting season, appropriate nesting bird buffers would be established to avoid impacts to nesting birds in the area surrounding the work site. SFPUC staff confirmed the nests situated on the transmission towers in question have been previously occupied by osprey and not bald eagles. According to Project Manager Tim Parkan, unoccupied nests on transmission towers are removed during the winter months under normal maintenance activities conducted by HHWP staff,, based on standard HHWP practice recommended by former SFPUC Biologist Michael Horvath.

Also, the U. S. Bureau of Land Management Mother Lode Field Office has designated areas in the vicinity of the Don Pedro Reservoir as the Red Hills Area of Critical Environmental Concern (ACEC)¹. The ACEC was designated to protect special status plants found normally on serpentine soils. As discussed in the Archeological and Historical Resources Section above, the proposed replacement towers sites are located on limestone not serpentine soils, Therefore the proposed Project is unlikely to encounter the special status plants identified in the ACEC. None of the proposed Project sites are on Bureau of Land Management land or within the boundary of the ACEC.

In order to comply with SFPUC Standard Construction Measure Number 8, the recommended additional general site surveys in particular for special status plants (including plant species that may be present in the nearby ACEC) and avoidance measures related to avian species would be implemented by the SFPUC and the construction contractor. The memorandum prepared by BioMaAS included a number of recommendations (limiting work to the September, October and November months to avoid impacts to avian species if feasible, or if infeasible surveys of the Project area and vicinity to identify the presence of active nests, if nests are present identification of buffer zones and limitation of activities within the buffer zones based on consultation with the California Department of Fish and Wildlife (CDFW) should avian species be present in the Project area.

¹ The map of the ACEC can be found on the BLM California Mother Load Field Office Website at http://www.blm.gov/style/medialib/blm/ca/pdf/folsom/gis_pdf_maps.Par.30850.File.dat/RedHillsACEC_Map2013web.pdf.

Therefore, no adverse effects to biological resources are expected.

Hazards and Hazardous Materials

State Water Resources Control Board (SWRCB) Geotracker and State Department of Toxic Substances Control (DTSC) Envirostor databases were reviewed by SFPUC staff. No hazardous sites were found at the towers sites and proposed staging areas.

Should hazardous materials be encountered the construction contractor would be required to comply with standard contract technical specifications related to the characterization, transportation and disposal of hazardous materials (should they be present) and comply with applicable local, State and federal regulations related to hazardous materials.

The construction crews would also be required to maintain a spill kit on site in the event fuels (gasoline or diesel) or lubricants are spilled during Project activity.

Therefore, adverse effects resulting from construction worker or public exposure to hazardous materials are not anticipated.

Noise

Tower sites are located in rural areas, and excavation and construction of replacement towers would take place more than 1,000 feet from the nearest residence. Tuolumne County has not adopted an ordinance regulating construction noise.

Although not anticipated, depending on the nature of the substrate to be drilled to install the foundations for the monopoles, limited blasting may be necessary. Also depending upon the stringing technique used once the replacement towers are constructed, either a haul line would be used to pull the conductor between the towers or use of a helicopter may be necessary.

Because construction of the replacement towers and stringing the wires would be temporary in nature and the closest sensitive receptor is more than 1,000 feet from the work area and recreational use of the Reservoir in the Project area is very limited, adverse effects from noise are not expected.

Recreation

Don Pedro Reservoir, operated by the Don Pedro Recreation Agency, is open to recreational boating activity. It is anticipated that restrictions on boating activity in the Project vicinity may be necessary if blasting is required and/or when the wires are strung between the replacement towers. The majority of the boating activity takes place at the far western end of the Reservoir near the Dam at the boat launching ramps and marinas. Due to the temporary nature of the Project construction activities and the more than 13,000 acres of water surface area (at maximum lake level) available for recreational use restrictions placed on recreational boating activities, if necessary, would not result in adverse effects to recreational use of Don Pedro Reservoir.

Transportation

Traffic generated by the project would be limited to a minimum number of vehicles using lightly-traveled private roads. Vehicles travelling to and from the sites on the east side of the Reservoir would use Kelly Grade Road onto Marsh's Flat Road and then onto the project sites from State Highway 49. Access to the sites on the west side of the Reservoir would be from State Highway 108 to La Grange Road to Old Don Pedro Road.

Bringing heavy equipment and long delivery trucks to the east side of the reservoir may be problematic because the roads are steep, winding and narrow, with overhanging oaks in some areas. The SFPUC and the construction contractor intend to use the smallest possible vehicles and pieces of equipment to complete the proposed Project. As indicated in the Biological Resources Section above, trees would not be trimmed or removed to complete the proposed Project.

Based on the number of vehicles to be used and the temporary nature of project construction, traffic delays on the roads would be minimal. Equipment and vehicles would be parked on the proposed staging areas adjacent to the Project sites. Infrequent inspection, maintenance and repair of the towers and transmission lines is conducted by SFPUC HHWP staff. One or two vehicles are used by HHWP staff during the monthly (or less frequent) trips to the towers for inspection, maintenance or repair.

Therefore, adverse effects to transportation are not anticipated.

Mr. Timothy Johnston, MP, Environmental Planner
Environmental Planning Division, San Francisco Planning Department
Don Pedro Reservoir Crossing 115kV & 230 kV Transmission Lines
(Contract Number HH-960)
CEQA Exemption Request
November 17, 2014
Page 9 of 10

Water Quality

No construction would take place within Don Pedro Reservoir (a water of the United States and a water of the State). SFPUC operation procedures as well as contract specifications require that best management practices for stormwater controls be implemented during construction. The SFPUC has an agreement with the Modesto Irrigation District and Turlock Irrigation District, operators of the Don Pedro Reservoir, to take water from the Reservoir when necessary. The Construction Contractor would be responsible for identification of the source of water needed to drill the foundations for the replacement towers. The Contractor would also be responsible for treatment of the water used for Project construction and appropriate disposal in compliance with applicable Central Valley Regional Water Quality Control Board regulations. As discussed earlier in the Air Quality section above, the SFPUC and the construction contractor would implement Standard Construction Measure Number 3 including preparation of a dust control plan and implementation of erosion and sedimentation controls.

Therefore adverse effects to water quality are not anticipated.

CEQA COMPLIANCE RECOMMENDATION

The SFPUC recommends that the proposed-Don Pedro Reservoir Crossing Project 115kV & 230 kV Transmission Lines (Contract Number HH-960) be classified as categorically exempt under CEQA, Section CEQA Section 15302, Class 2 (**Replacement or Reconstruction**). Class 2 consists of the replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. Subsection (d) provides an exemption for the replacement or reconstruction of existing utility systems and/ or facilities involving negligible or no expansion of capacity.

Mr. Timothy Johnston, MP, Environmental Planner
Environmental Planning Division, San Francisco Planning Department
Don Pedro Reservoir Crossing 115kV & 230 kV Transmission Lines
(Contract Number HH-960)
CEQA Exemption Request
November 17, 2014
Page 10 of 10

If you have any questions regarding the proposed Projects, please contact
Barry Pearl, Senior Environmental Project Manager, at 415-551-4573.

Sincerely,



Irina P. Torrey, AICP, Manager
Bureau of Environmental Management

Attachments: SFPUC Hetch Hetchy Water and Power Construction
Contract HH-960
Don Pedro Reservoir Crossing 115kV and 230kV
Transmission Lines, October 30, 2013, 95% Drawings

SFPUC Hetch Hetchy Water & Power, Basis of Design
Memorandum 115kV and 230kV Transmission Lines at
Don Pedro Reservoir Crossing, prepared by Black & Veatch,
95% Submittal Issue, November 5, 2013

BioMaAS, Inc. Don Pedro Crossing Biological Constraints
Analysis Memorandum, Prepared for the SFPUC, Dated
September 30, 2014

cc:

Tim Parkan, Project Manager, SFPUC Construction Management
Peter Dean, Regulatory Specialist, SFPUC Hetch Hetchy Regional
Water System, Natural Resources Division
Paul R. Kneitz, Black & Veatch
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Deb Craven-Green, SFPUC Bureau of Environmental Management