

Cliff Johnson

Senior Planner
Humboldt County Planning Department
3015 H Street
Eureka, CA 95501

Re: PG&E, Project 14376, Appeal to the Board of Supervisors for Coastal Development Permit

Project DescriptionProject Location

The project is located near 2625 Patrick's Point Drive (APN 517-041-016-000) in Humboldt County, California, between the City of Trinidad and community of Patrick's Point. The project is located within the Coastal Zone (Trinidad Area Local Coastal Plan [LCP]), and it is located just outside of a mapped scenic area identified by the LCP.

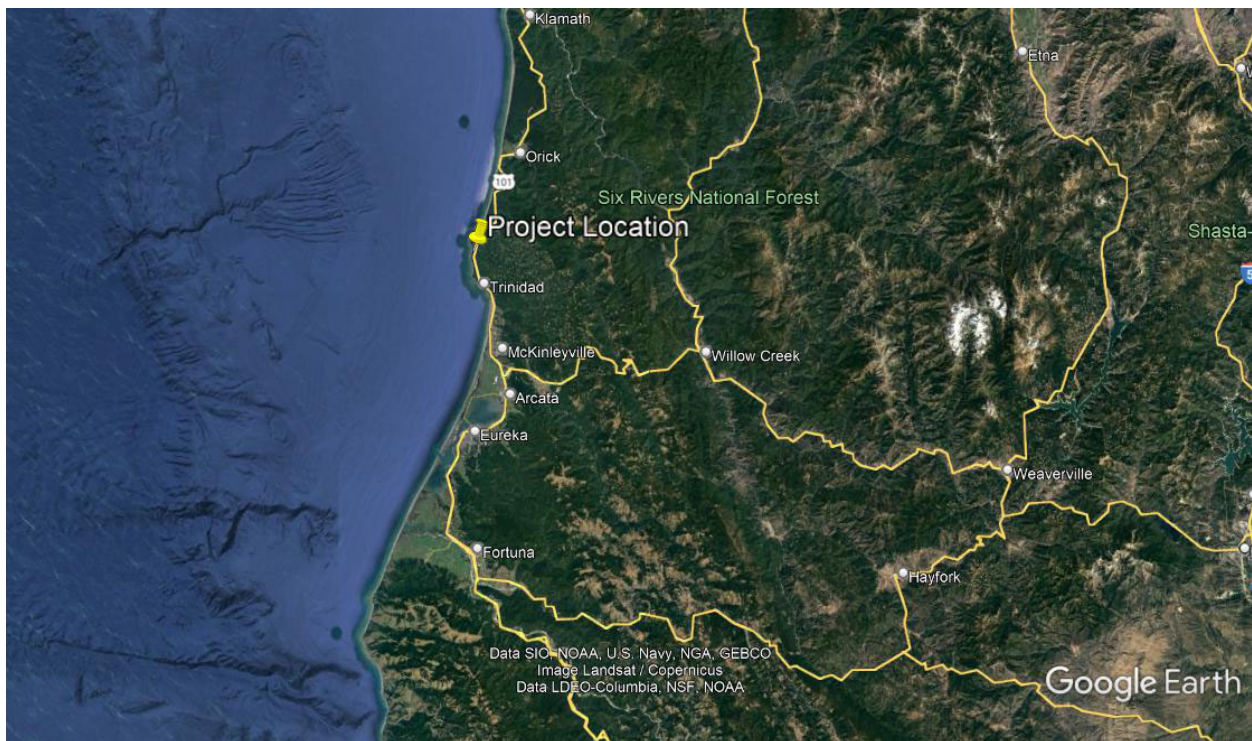


Figure 1. Project Location Map

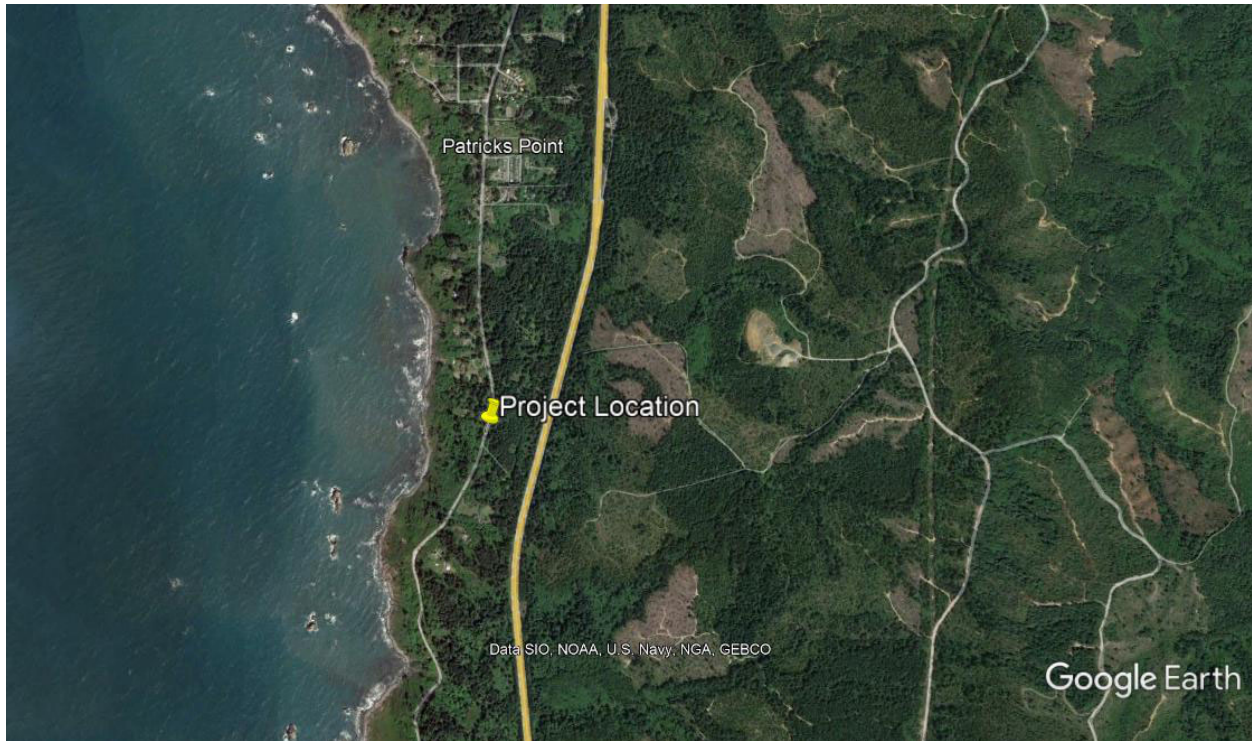


Figure 2. Project Vicinity Map

Project Background

In 2016, an electric distribution line regulator bank was installed on the Trinidad 1102 electric distribution line along Patrick's Point Drive to improve service reliability to approximately 1,226 electrical meters served by the Trinidad 1102, Orick 1102, and Orick 1101 distribution lines. When Trinidad, Big Lagoon, and/or Orick Substations are de-energized for maintenance, the electrical supply between Trinidad and Orick must be re-routed along Trinidad 1102. Due to the long distances the power must be re-routed in this area, PG&E needed to install additional voltage regulators to maintain stable voltage and improve system reliability. Without the regulators, customers along 20 miles of coastal Humboldt County between Trinidad and Orick may experience extended power outages during planned and unplanned (emergency) work at the substations.

Based on a study performed by PG&E's electrical engineers, PG&E determined that Patrick's Point Drive was the optimal location to install this equipment to have the desired effect on system reliability. Installing the regulators at alternative locations would have required additional overhead equipment, which would have further impacted the visual resources of the coastal zone. Alternate locations along Patrick's Point Drive were also constrained by the availability of existing right-of-way, accessibility, and environmental constraints.

To install the voltage regulators, PG&E acquired an Encroachment Permit from Humboldt County's Public Works Department. However, PG&E failed to obtain a Coastal Development Permit from Humboldt County's Planning Department prior to installing the equipment.

One of the new poles was placed too close to the driveway of a private property owner (APN 517-041-016-000), and it precludes access to the property by vehicles necessary to harvest timber (vehicles with up to 10 axles). The property owner filed a complaint with Humboldt County, and the equipment was deemed to be a public nuisance. PG&E has since been cooperating with Humboldt County Planning Department staff to obtain a Coastal Development Permit that would allow PG&E to relocate the new poles and equipment farther away from the driveway so the property owner can have proper ingress/egress during timber harvest operations.

To support this permitting process, PG&E performed biological, cultural resources, and hazardous waste studies to evaluate whether the project would impact coastal resources. The results of these studies indicate the project would not significantly impact biological resources, including Environmentally Sensitive Habitat Areas (ESHA), wetlands, waterways, endangered or threatened species, or other sensitive biological resources, or cultural resources, including historic, tribal, or archeological resources. Avoidance and minimization measures would be implemented to avoid impacting the environment from the handling of hazardous wastes. The proposed design, which is described in more detail below, was submitted to Humboldt County's Public Works Department for review and approval, and the proposed design complies with local design standards. The project also complies with the latest utility design standards.

In May 2022, the Coastal Development Permit application was presented by Humboldt County Planning Staff to the Planning Commission during a public hearing, where it was recommended for approval by County staff. Planning Commissioners weren't able to approve the application during the hearing. In June 2022, PG&E responded to all comments made by the Planning Commissioners and the public/residents along Patrick's Point Drive. The project was subsequently placed on the agenda for a July 2022 hearing. During the July 2022 hearing, the Planning Commissioners denied the application on the basis the project was a hazard to motorists operating vehicles along Patrick's Point Drive and the voltage regulators and miles of adjacent electric distribution line should be placed underground to minimize impacts to the scenic road.

While PG&E respects the opinions of the Planning Commissioners and nearby residents, PG&E is submitting this appeal to the Humboldt County Board of Supervisors for the following reasons:

- The project is not a threat to motorists driving along Patrick's Point Drive. Humboldt County's design standards were developed to ensure local development does not compromise traffic safety, among other reasons (Humboldt County Code, Title III Land Use and Development, Appendix to Division 2 Establishing Subdivision Design and Improvement Standards). The project was designed according to local design standards, and the project was approved by the



Humboldt County Public Works Department, because it is consistent with local design standards for traffic safety.

- Although the project is not located within an LCP-designated scenic area, PG&E understands the project area is considered to be a valuable scenic resource. The project cannot be undergrounded, because voltage regulators cannot be placed underground. Voltage regulators must be located aboveground, and they are often installed on a platform mounted between two utility poles. While many residents submitted comments stating the equipment is atypical, this equipment is routinely installed throughout PG&E's service territory and is a common component of the electric grid.
- Respectfully, Humboldt County does not have jurisdiction over the design, construction, or location of PG&E's electrical facilities. Only the California Public Utilities Commission (CPUC) has jurisdiction over these matters, as outlined in General Order 131-D. The County's decision to issue a Coastal Development Permit for this project should be based on whether or not the Project is consistent with the Trinidad Area LCP and associated policies. Humboldt County Planning Department staff recommended the project for approval, because it is consistent with the LCP.

Existing Condition

The existing condition consists of four utility poles located on the east side of Patrick's Point Drive within County right-of-way in close proximity to a driveway for 2625 Patrick's Point Drive (APN 517-041-016-000). Of these four utility poles, one is located to the south of the driveway and three are located to the north of the driveway (Figure 3 and Figure 4). Only the three utility poles located to the north of the driveway would be modified as part of the project. Of these three utility poles that would be modified by the project, the northmost pole contains a transformer and a service connection to a customer on the west side of Patrick's Point Drive and elevated regulators are mounted between the two southmost poles.



Figure 3. Project Location, Looking North along the Patrick's Point Drive



Figure 4. Project Location, Looking South along the Patrick’s Point Drive

Proposed Changes

The project proposes the following changes to the utility poles located north of the driveway (Figure 5):

- The southmost existing pole located approximately 3 feet north of the private driveway would be removed to improve ingress/egress from the driveway to (APN 517-041-016-000).
- The middle pole would be replaced with a new 55-foot pole in its current location, and it would become the closest pole to the driveway with an offset of approximately 17 feet from the face of the pole to the edge of driveway. The new pole would be 10 feet taller than the existing pole to comply with new utility standards.
- The northmost pole that contains an existing transformer would be replaced with a new 55-foot pole in the same location. The new pole would be 10 feet taller than the existing pole to comply with new utility standards.
- A new 55-foot pole would be installed approximately 14 feet to the north of the replaced transformer pole.

The existing regulators and transformer would be reconfigured on the new arrangement of poles. The proposed configuration of equipment would be similar to the existing condition, but in reverse order

(Figure 3). The elevated regulators would be mounted between the two northmost proposed poles (instead of the two southmost poles), and a transformer would be mounted on the southmost pole (instead of the northmost pole). An existing 3-inch diameter underground conduit that provides service to a customer on the west side of Patrick’s Point Drive would be relocated to the new transformer pole, and an underground utility vault would be installed at the base of the proposed transformer pole. This work would require approximately 440 square feet of vegetation removal. Refer to Appendix A for the design plans.

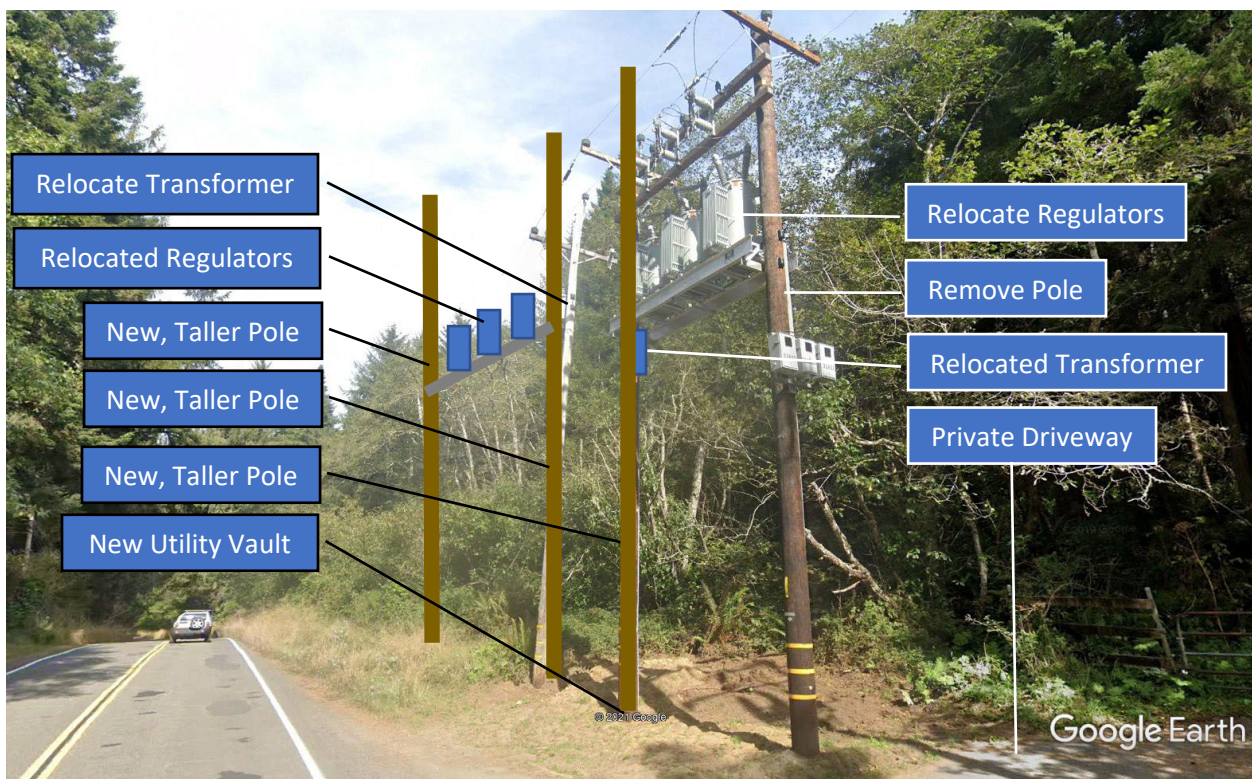


Figure 3. Proposed Improvements, Looking North

Environmental Constraints

PG&E subject matter experts in biological resources, cultural resources, hazardous materials, water quality, and environmental planning reviewed the project to identify site constraints/resources requiring avoidance, minimization, and mitigation measures, as described below.

- *Biological resources.* There are no waterways or riparian corridors within 100 feet of the project location. There is potential low-quality Northern spotted owl habitat at the project location, but



there are no CNDDDB occurrences of this species within 1.5 miles of the project location. Federally-listed plant species are not expected to occur at the project location. For these reasons, the biologist determined there are no ESHAs at the project site and no ESHAs would be impacted by project construction/operation.

- *Cultural resources.* There are no known cultural resources at the project site. Therefore, there would be no impacts to cultural resources during construction of the project.
- *Hazardous materials.* Based on the equipment and construction activities associated with project activities, PG&E is requiring the crew to implement several avoidance and minimization measures that must be implemented during construction. The project would involve the relocation of oil-filled electrical equipment (OFEE). All OFEE must be handled according to PG&E specifications, and any leaking OFEE identified during construction must be reported immediately. Additional measures regarding to containment/testing/disposal of spoils (estimated at approximately 31 cubic yards) and handling/disposal of treated wood waste would also be implemented during construction.
- *Water quality.* The cumulative soil disturbance is 0.013 acres. If additional staging is required that is not in an established maintenance yard, on pavement, or in any other location not mentioned above and over 0.887 acres, a Storm Water Pollution Prevention Plan (SWPPP) will be prepared and implemented. Additionally, vault dewatering, if needed, would be coordinated with the PG&E Environmental Management Department throughout the duration of the project.
- *Scenic resources.* The elevated regulator bank was installed at the project site to improve service reliability to PG&E customers north of Trinidad. To improve service reliability, the regulators needed to be installed along the Trinidad 1102, which runs along Patrick's Point Drive. Because the distribution line runs along Patrick's Point Drive, a mapped scenic corridor, there were few opportunities to avoid placing the equipment within a scenic corridor. After site visits and consideration of various proposed locations, the project site was found to be the most suitable due to availability of existing right-of-way, accessibility, and lack of environmental constraints. Installing the regulator bank at alternate locations would have necessitated the installation of additional regulators (compared to the three installed at the project location), which would have further impacted the scenic character of the road. For these reasons, the project location was determined to be the least impactful to land and environmental resources.