DOCKETED

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Project Title:	Humboldt Bay Generating Station - Compliance
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Document Title:	Letter to CEC staff regarding Humboldt Bay Generating Station (06-AFC-07C)
Description:	Humboldt Bay Generating Station (06-AFC-07C), Minor Project Description Changes to Project Modification for Fiber Optic Communications System, Installation of a Microwave Dish and Monopole, and Re-Routing of an Existing Water Line Segment
Filer:	Cathy Hickman
Organization:	Chuck Holm, PG&E
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Pacific Gas and Electric Company®

Humboldt Bay Generating Station 1000 King Salmon Ave. Eureka, CA 95503-6859

HBGS-CEC-129

July 8, 2016

Mr. Bruce Boyer
Compliance Project Manager
California Energy Commission
Energy Facilities Siting and Compliance Division
1516 Ninth Street, MS 2000
Sacramento, California 95814-5512

SUBJECT: Humboldt Bay Generating Station (06-AFC-07C), Minor Project Description Changes to Project Modification for Fiber Optic Communications System, Installation of a Microwave Dish and Monopole, and Re-Routing of an Existing Water Line Segment

Dear Mr. Boyer:

On May 5, 2016, PG&E submitted a Petition for Project Modification which included the installation of a fiber optic communications system. In the petition, PG&E stated that a 3 feet deep and 1-foot-wide trench would be excavated within a 26-feet wide corridor to install the two, four-inch fiber optic conduits (one conduit for the Humboldt Bay Generating Station (HBGS) and the other for the Humboldt Bay Power Plant (HBPP)) within which the fiber optic cables would be located. PG&E is now proposing a trenchless construction method, horizontal boring, to install the fiber optic conduits within Alpha Road, on the southeast shoulder.

The Petition for Project Modification also provided two location options for the pull boxes at each end of the fiber optic route. The specific location for these pull boxes has now been determined. In addition, a third pull box will be installed in the middle of the fiber optic route to aid in the installation of the fiber optic cable. The purpose of this letter is to describe these minor project description changes.

Trenchless Construction Method

The horizontal boring construction method requires minimal excavation compared to conventional trenching. Specifically, it will involve excavating three bore pits within Alpha Road, on the southeast shoulder, as shown in Figure 1. The dimensions of the bore pits will be three feet wide by five feet long by 3 feet deep. The bore pits will be located approximately 200 feet to 500 feet apart from one another. A drill head attached to a two-inch steel rod will then be pushed through the soil between each bore pit, creating the pilot bore hole. A locating device on the drill head will direct the drill head to the adjacent bore pit. The conduits will then be attached to a back reamer which will be pulled through the hole, expanding its diameter to accommodate the conduits.

Water only will be used during the boring operations. Approximately 1,200 to 2,000 gallons of water from the City of Eureka will be brought on-site by the construction contractor for use during the boring

operation. The water will be used to keep the drill head cool and to lubricate the hole. Any water not re-used and collected drilling mud from the boring process will be hauled off-site and disposed of at a licensed landfill.

During the boring process, the water pressure will be continually monitored by the contractor. If there is a drop in pressure, which could indicate an inadvertent release of water, the boring process will be immediately stopped and the area inspected. If the water is escaping from the pilot bore hole, either the path of the bore hole will be modified to avoid the area of the release or if the area of the release is small (approximately 10 feet or less) it will be bored without the use of water.

Once the conduits are installed, the pull boxes will be installed. The pull boxes are precast concrete vaults used in facilitating the installation of the fiber optic cables through the conduits. There will be three pull boxes installed along the southeast edge of Alpha Road, within the road surface (see Figure 1). One pull box will be installed at each end of the fiber optic route. Given the length of the route, a third pull box will be installed in the middle of the route.

The only trenching associated with the installation of the fiber optic cables and conduits, will be approximately 50 feet where the conduit and cables will cross Alpha Road and extend to the HBGS Communications Room (see Figure 1). The trench will be approximately 3 feet deep and 1 foot wide.

After the pull boxes are installed and the 50-foot trenching completed, the bore pits will be filled. Given the location of the bore pits on the Humboldt Bay Power Plant (HBPP), which is currently being decommissioned, if the soil is to be re-used, it must first be tested in accordance with the Department of Toxic Substances Control (DTSC) approved HBPP Interim Measures Removal Action Work Plan (IM/RAW). This document governs the management of soil generated by the HBPP decommissioning project, including onsite reuse of soil that achieves IM/RAW soil reuse screening levels. If soil were not to achieve the IM/RAW soil reuse screening levels, it would be disposed of at an appropriately licensed landfill. The excavation from which the soil came would then be filled using soil from a pre-approved commercial borrow site. As an alternative to testing the soil for re-use, the contractor may haul the soil off-site for disposal and use clean fill from a pre-approved commercial borrow site.

The final activities after the conduit is installed and the bore pit locations restored, is the installation of the fiber optic cables. The cables will be connected to a rope which will be pulled through the conduits from each pull box location. The entire construction effort for installing the fiber optic cables and conduits is approximately 5 days.

Avoidance and Minimization Measures

The following Avoidance and Minimization Measures (AMMs) will be implemented during installation of the fiber optic conduits and cables.

Biological Resources

As stated in the May Petition for Project Modification, no significant and adverse environmental impacts are anticipated as a result of the installation of the fiber optic communications system. The bore pit and pull box excavations will occur within Alpha Road. However, given the proximity of one of the bore pits to adjacent wetlands (see Figure 1), a biological monitor will be present during the excavation of these two project features to make sure the wetlands are avoided.

In the unlikely event of an unanticipated release of muddy water from the horizontal boring process, a biological monitor will be on-site to monitor the operation and ensure adjacent wetlands are protected. If any muddy water is released affecting the adjacent upland vegetation, it will be inspected by the

biological monitor and cleaned-up, as needed. The adjacent vegetation consists of previously disturbed, non-native vegetation comprised primarily of annual grasses that are regularly mowed. Adjacent to this vegetation are Coastal Commission and U.S. Army Corps of Engineers jurisdictional wetlands (see Figure 1). If wetlands were affected by an unanticipated release of muddy water, the appropriate agencies would be notified and the area would be cleaned-up and restored as agreed upon by the agencies.

Cultural Resources

Given the depth of the bore pits, pull boxes, and minimal trenching (approximately 3 feet), it is possible that a soil horizon known as Horizon A that is culturally sensitive, could be encountered. Given this, the CEC-approved Cultural Resources Specialist or Cultural Resources Monitor will monitor ground-disturbing activities in native soils, pursuant to CUL-6.

Additional AMMs

As stated in the original Petition, the following environmental protection measures will also be taken during construction:

- Worker Environmental Awareness Training will be provided to the construction workers prior to commencing work.
- A pre-construction nesting bird survey will be conducted by the CEC-approved Designated Biologist or Biological Monitor.
- Best Management Practices will be employed to ensure stormwater run-off from construction will not affect adjacent areas.

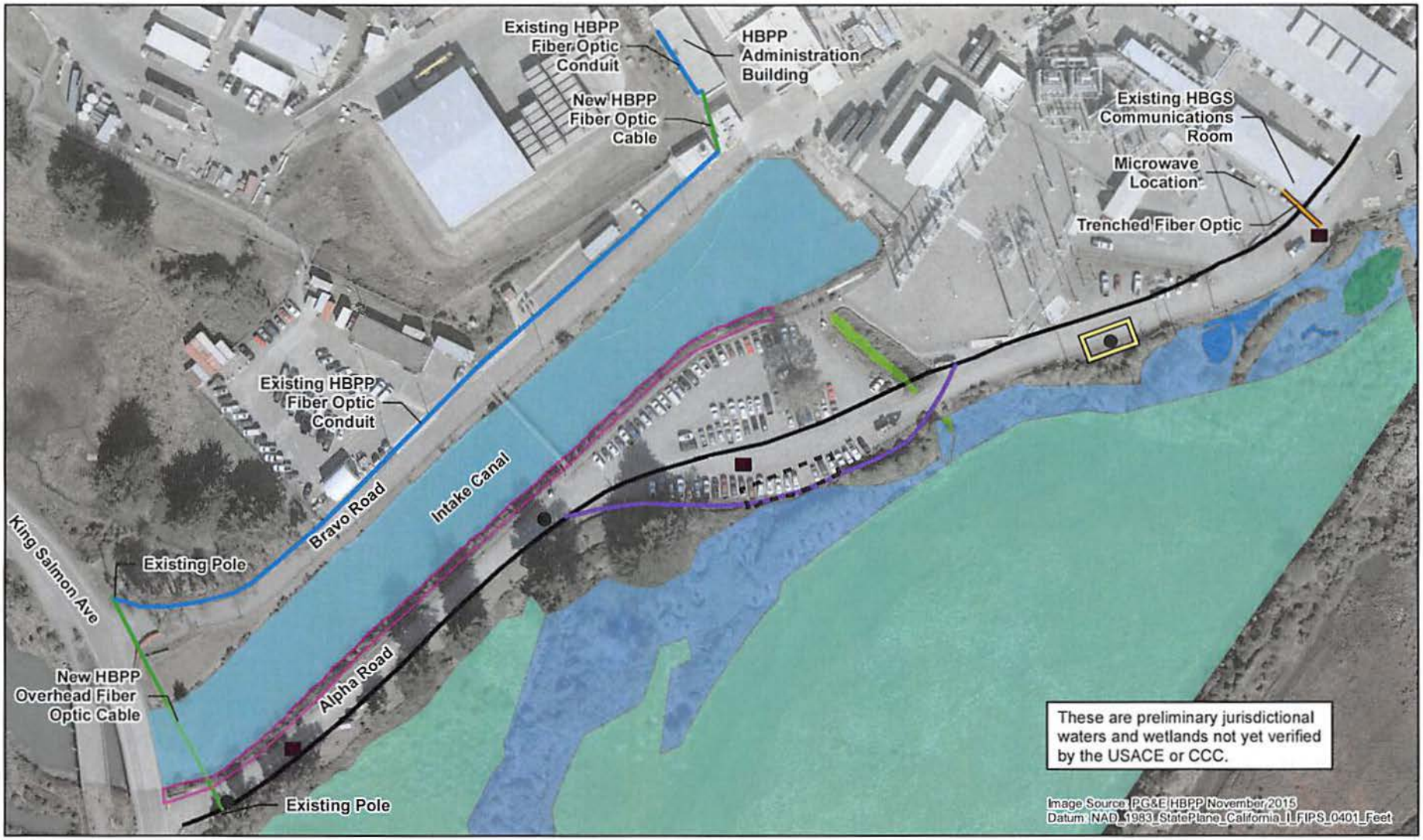
PG&E believes the use of the horizontal boring process and with implementation of the AMMs, any potential impacts associated with the installation of the fiber optic cables and conduits will be insignificant.

Should you have any questions regarding the minor project description changes addressed above, please contact Scott Washington at 707-269-1810 or Susan Strachan at 530-757-7038.

Sincerely,

Chuck Holm
Humboldt Bay Generating Station Manager

attachment



LEGEND

- Proposed Bore Pit Location
- Proposed Pull Box Location
- Existing HBPP Fiber Optic Conduit
- New HBPP Fiber Optic Cable
- Water Line (Existing)
- New Water Line (If Necessary)
- Trenched Fiber Optic
- Areas Where Biological Monitoring Will Occur, Wetlands Flagged/Fenced
- Areas Where Biological Monitoring Will Occur
- Coastal Commission Wetland
- Seasonally Flooded Wetland
- Semipermanently Flooded Wetland
- Estuarine Persistent Wetland
- Waters
- Intermittently Flowing Drainage Ditch
- Location of Special-status Plant – Sea-watch (Angelica lucida)

0 75 150
Feet

N

FIGURE 1
Proposed New Fiber Optic Line
PG&E Humboldt Bay Generating Station
Eureka, California

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