

Compliance and Risk Department-Vegetation Management 1108 Murphys Grade Road Angels Camp, CA 95222

April 4, 2013

Ms. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

**Subject:** Woodleaf-Kanaka Junction Transmission Line Project FERC Project No. 2281-011 and Sly Creek Transmission Line Project FERC Project No. 4851-005 Annual Consultation Meeting Summary

Dear Secretary Bose:

On June 10, 2010, the Federal Energy Regulatory Commission (FERC or the Commission) issued "Order Issuing Subsequent License (Transmission Line)" (131 FERC ¶ 62,222) (Order) for the Woodleaf-Kanaka Junction Transmission Line Project (FERC Project No. 2281-011), and "Order Issuing Subsequent License (Transmission Line)" (131 FERC ¶ 62,223) (Order) for the Sly Creek Transmission Line Project (FERC Project No. 4851-005). Pursuant to paragraph 19 of each Order, the License is subject to the Forest Service Final Section 4(e) Conditions set forth in Appendix A of the Order. Standard Forest Service Condition No. 3 requires that Pacific Gas and Electric Company (PG&E or License), beginning the first full year after License issuance, participate in annual meetings with the Forest Service to present Project operation and maintenance (O&M) activities planned for the next calendar year. In addition, PG&E shall present results from current year monitoring of noxious weeds and special-status species, as well as any additional information that has been compiled for the Project area. The Licensee must file with the Commission evidence of the consultation within 60 days following such consultation.

On February 7, 2013, PG&E and the staff of the Plumas National Forest (PNF) conducted the third Annual Consultation meeting in compliance with Standard Forest Service Condition No. 3. This letter, reviewed and approved by the PNF staff on April 3, 2013, serves as evidence of consultation and is filed with the Commission. The purpose of the meeting was to update the staff of the PNF on O&M activities conducted in 2012 and planned in 2013, and the status of License compliance and various resource management plans.

The list of attendees for the PNF and PG&E is attached at bottom.

# ANNUAL CONSULTATION MEETING SUMMARY

PG&E reported on the following Project O&M and License compliance activities completed during 2012 as well as those planned for 2013.

#### Project-related Operations and Maintenance

At the request of PNF, PG&E will be holding an annual joint meeting with the Forest Service and other agencies to do a high level overview of O&M on all transmission line projects, including FERC Licensed projects. PG&E's leads for O&M will be present. The meeting will take place at the PNF's district office in Oroville sometime in April or early May.

At the request of PNF, PG&E sent the PNF detailed information about planned vegetation management on the Sly Creek and Woodleaf-Kanaka projects for PNF approval. PG&E indicated there is no work beyond routine vegetation management currently scheduled for 2013, which should begin in February 2013.

With respect to transmission line equipment maintenance, PG&E said there is no scheduled maintenance on either line. This is subject to change depending on budget or any new findings. The next pole replacements are currently planned for 2014, per the 2012 Annual Consultation Meeting.

PG&E will be clearing vegetation along the stretch of Lumpkin Road to Forbestown. That's the only known road work on the projects this year, although this work is not associated with the Sly Creek or Woodleaf-Kanaka lines. The Forest Service also has some planned road improvements in the area, cleaning up a slip (and some erosion) on the gravel road 20N24.

If any new O&M work is scheduled by PG&E, PG&E will communicate such changes to the PNF prior to conducting the work.

PG&E and the PNF are continuing to move forward on an Environmental Analysis (EA) under the National Environmental Policy Act (NEPA) to cover the application of herbicides on all 14 transmission line corridors located on the PNF. Currently, the person assigned to work on the EA for the PNF is on 'detail' so no one at the PNF is currently working on it. The tentative completion date for the EA is approximately May-June 2013. PG&E will reengage with the district to keep the EA process moving forward. Additionally, PG&E is investigating the possibility of an EA to cover herbicide applications on all National Forest lands within PG&E's service area.

PG&E said it will setup the annual environmental training for its O&M crews. The training session has been scheduled for March 25, 2013, to be held at PG&E's maintenance yard in Redding, and the training will be presented by HDR's environmental and cultural staff.

#### Fuels and Fire Management

PG&E discussed the proposed implementation of the Fuel Treatment Plan, as presented by Environmental Restoration Technology, Inc. ([ERT], PG&E's fuels treatment consultant), which will begin in 2013. There was a kickoff meeting for fuels treatment on June 13, 2012 that included the Forest Service, ERT and PG&E. Fuels treatment is a requirement of the license and a Fuels Treatment Plan was approved by FERC in 2011. The fuels treatment work is covered by FERC's NEPA Finding of No Significant Impact.

Fuels treatment will remove hazard trees (dead, diseased or susceptible to disease) within the 200-ft hazard tree zone (HTZ) on each side of the FERC boundary or right-of-way (ROW), using the timber sale process, as well as within the 75-ft ROW. Hazard trees will be removed using standard silviculture methods. There are currently four phases of work planned:

- Phase I: 2013, Woodleaf-Kanaka line, poles 1/2 to 2/7
- Phase II: 2014, Woodleaf-Kanaka line, poles 2/8 to 3/6
- Phase III: 2015, Woodleaf-Kanaka line, poles 4/2 to 5/1

Phase I will commence after the snow melts in May (approximately) and will last about 8-10 weeks. The eastern section of Woodleaf-Kanaka has the most straightforward fuels treatment methods, being predominantly mechanized. However, Phase II western Woodleaf has more sensitive resources, necessitating more hand treatment. Phase III (2014), in the area of Broken Springs Road, will be a more difficult area to treat, but has been masticated in the past.

The PNF as a whole has a high vegetation growth rate than other Forests in the region, and is further stimulated by disturbance; the higher grow rate results in higher unit costs for vegetation management.

Some road enhancement and rehabilitation will be necessary to complete the fuels treatment management. Sensitive resource protection, including training, flagging/fencing and monitoring, will take place before and during fuels treatment. The PNF requested that all future coordination and consultation by PG&E for fuels treatment activities also include PNF staff Deedee Cherry, Dan Smith and Herman Wendell.

#### Status of Cultural Resources and Historic Properties Management Plan

Cultural surveys completed in 2004 in support of relicensing, located only one previously recorded site on the Woodleaf-Kanaka line. In 2008, two additional sites were located on the Woodleaf-Kanaka line, recorded, and included in the Historic Properties Management Plan (HPMP) for protection and continued management. In November-December 2012, the entire line, except for places that were unsafe or thickly overgrown, was resurveyed for archaeological resources that may not have been previously identified, in support of the proposed fuels treatment. The surveys resulted in the expansion of one previously documented site and the location of one new site. In addition, site boundaries were delineated for two sites to assist fuel treatment crews in avoiding inadvertently

damaging cultural deposits buried under the vegetation. The cultural technical report of findings for this latest work was submitted to PNF cultural staff on February 22, 2013 for a 30-day review. HDR will revise the report upon receipt of relevant comments from PNF and submit it to the State Historic Preservation Officer (SHPO) for a 30-day review and concurrence. If PNF finds that the survey results meet certain criteria under the newly implemented Region 5 Programmatic Agreement (PA) that provides PNF the authority to provide a final concurrence or direction without the SHPO's review, then SHPO review of the report will not be necessary.

Prior to fuels treatment, the archaeological sites documented on the line will be flagged and/or fenced with a 30-meter (100 ft) buffer. An archaeologist will be in the field to monitor the fuels treatment within and adjacent to the archaeological sites. Additionally, a monitoring plan will be developed to inform and direct the fuels treatment crews on the process of addressing any cultural resources that may inadvertently be discovered during fieldwork, and that lays out the archaeological monitor's roles and responsibilities. Archaeological monitoring will include tailgate meetings to provide field crew with an overview of the monitoring plan and processes.

There are no actions planned for 2013 under the HPMP. The next activity scheduled under the HPMP is the 2015 monitoring of known sites to assess their condition and integrity.

PNF staff requested information regarding the status of National Register of Historic Places evaluations (NRHP) of three of the archaeological sites documented in the Area of Potential Effects (APE). PG&E reported that the evaluations are not currently funded, and that PG&E has evaluated the cost effectiveness of performing evaluations versus other means of site protection, however, the question of funding and alternative methods of resource protection will be revisited internally in June. PNF staff expressed a desire to have the sites evaluated, which could lead to releasing some sites from protection. PNF staff also expressed willingness for PG&E to conduct site evaluations in stages to help spread the financial burden over multiple years. PG&E will re-address the potential path forward, staying in accordance with the management measures included in the HPMP, when and after revisiting the issue in June.

PNF staff discussed the status of a revised Region 5 Forest Service PA between the Forest Service and SHPO, which was completed on February 6, 2013. According to PNF staff, the PA may allow streamlined cultural consultation on projects (e.g., Forest Service may proceed with some projects without SHPO consultation), however, the PNF acknowledged they had not had a chance yet to read it carefully and that the streamlined approach is limited to studies with negative results. PG&E requested a copy of the PA, which was provided by PNF on February 7, 2013.

## **Botanical Resources**

PG&E provided CDs with GIS files and reports for botanical resources, as well as hard copies, to PNF staff.

There are two components to botanical resources work for 2013: support of fuels treatments; and provisions under the Invasive Weed Management Plan and Special Status Species Management Plan.

PG&E will survey in areas scheduled for 2013 fuels treatment that were not surveyed previously. The Forest Service will receive maps of newly located special-status plant and invasive weed occurrences prior to the start of fuels treatment. All special-status plant occurrences will be fenced or flagged for protection, as will invasive weed occurrences to prevent their spread. Fuel treatment crews will be shown the locations of all marked special-status plant and weed occurrences, as well as taught how to identify special-status plants and invasive weeds. A monitor will also be present when crews are working near special-status plant occurrences. Equipment will be washed prior to being brought on to Forest Service land and then washed again after any work in weedy areas.

2013 botanical surveys will also include the area proposed for fuels treatment in 2014.

Per the provisions of the Invasive Weed Management Plan and Special-Status Species Management Plan, PG&E will complete the 2012 surveys for invasive weeds and special-status plants, by surveying the lower end of the Woodleaf-Kanaka line that could not be accessed in 2012. Surveys will take place during April/May and June/July 2013.

Per the Invasive Weed Management Plan, management of the seven broom occurrences (5 on PNF lands) will begin in 2013. PG&E will draft a broom management strategy for review and approval by the PNF. Per prior discussion with the PNF botanist, Lawrence Janeway, broom management strategy will consist of hand-pulling in 2013, and herbicide application thereafter if approved by the EA. Broom will be treated until it is eradicated.

Additionally, per the Special-Status Species Management Plan, PG&E will monitor an occurrence of Mosquin's clarkia (*Clarkia mosquinii*) which is collocated with three invasive weed species. A draft monitoring strategy will be written for review and approval of the PNF. At a minimum, the boundaries of the clarkia and the invasive weeds will be mapped annually for three years.

In order to fulfill provisions of the Special-Status Species Management Plan and Project Specific Forest Service Provision 20, PG&E requested the updated Forest Service Sensitive plant and wildlife species lists. PNF staff agreed to provide the updated lists once they are available, which should be soon; Amy Lind (Forest Service) agreed to follow-up internally on status of the updated list.

## Roads Management

PG&E provided the Forest Service with hard copies of the 2012 Roads Assessment for Forest Service review and comment.

PNF staff reported that 20N24 will be closed approximately 3 miles up from Ponderosa Dam for repairs in May or early June. This work will require approximately 3 weeks to complete and needs to be coordinated with fuels treatment so as not to conflict.

Other Discussions

PNF requested that PG&E review latest information on avian collisions with the line for the years 2011-2012 and to report any changes being made for the prevention of these collisions. PG&E agreed to provide the information.

PNF staff requested that an annotated agenda continued to be used for future annual meetings. Additionally, staff requested that all provisions of the License be discussed at each Annual Consultation Meeting to ensure nothing was being overlooked.

PG&E and the PNF maintain a collection agreement to fund Forest Service staff for labor required to support review of PG&E documents, as needed for O&M of the Project transmission lines. Currently, the status of the Collection Agreement is with the PNF.

If you have any questions or concerns regarding this meeting summary, please contact me at (209) 736.6644.

Respectfully submitted,

Pul M. Malen

PAUL MABEN Vegetation Program Manager/Transmission FERC Coordinator

Attachment: (1) List of Meeting Attendees

cc: via email, w/attachment

Karen Hayden Plumas National Forest

Deb Schoenberg Plumas National Forest

Terri Simon-Jackson Plumas National Forest

Amy Lind US Forest Service

### PACIFIC GAS AND ELECTRIC COMPANY AND PLUMAS NATIONAL FOREST

## WOODLEAF-KANAKA JUNCTION TRANSMISSION LINE PROJECT FERC PROJECT NO. 2281-011 AND SLY CREEK TRANSMISSION LINE PROJECT FERC PROJECT NO. 4851-005

### ANNUAL CONSULTATION MEETING FEBRUARY 7, 2013

# ATTENDEES

	NAME	COMPANY	POSITION	E-MAIL ADDRESS
1	Karen Hayden	PNF-FRRD	District Ranger	khayden@fs.fed.us
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3	Amy Lind	PNF-TNF	Hydroelectric Coordinator	alind@fs.fed.us
4	Oswaldo Angulo	PNF-FRRD	District Hydrologist	oangulo@fs.fed.us
5	Lawrence Janeway	PNF-FRRD	Botanist	ljaneway@fs.fed.us
6	Jason Vermillion	PNF-FRRD	Fuels	dcherry@fs.fed.us
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8	Wendy Parker	PNF-FRRD	Archaeologist	wparker@fs.fed.us
9	Cindy Roberts	PNF-FRRD	Wildlife and Aquatics	ckroberts@fs.fed.us
10	Dan Smith	PNF-FRRD	Eco Ops/Sales Admin	Dwsmith02@fs.fed.us
11	Herman Wendell	PNF-FRRD	District Road Maintenance Manager	hwendell@fs.fed.us
12	Paul Maben	PG&E	Project Manager	pmm5@pge.com
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17	Bob Burnham	ERT	Senior Fuels Management Specialist	bob@ertplan.com
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ERT – Environmental Restoration Technology, Inc.

PNF - Plumas National Forest

FRRD - Feather River Ranger District