

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 21, 2019

Ms. Kirstie C. Raagas  
San Diego Gas & Electric Company  
Regulatory Affairs  
8330 Century Park Court, CP32F  
San Diego, CA 92123

RE: Tie Line 649 Wood-to-Steel Replacement Project Notice to Proceed

Dear Ms. Raagas:

This letter serves as your Notice to Proceed (NTP) for the Tie Line (TL) 649 Wood-to-Steel Replacement Project (Project). Provided that the conditions described in Section 3 of this letter are met, San Diego Gas & Electric Company (SDG&E) may begin construction activities for the Project. As described briefly in Section 3 of this letter, and more fully in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP), SDG&E is required to fully implement and document compliance with the mitigation measures (MMs) and Applicant Proposed Measures (APMs) identified in the Project's Initial Study/Mitigated Negative Declaration (IS/MND), as well as any permit conditions. Protocols and procedures for ensuring compliance are described in the MMCRP, and must be adhered to by SDG&E and its contractors.

### **1. Overview of NTP Request and Mitigation Measure Compliance Documentation Submitted to Date**

On June 11, 2019, SDG&E submitted a NTP request to the California Public Utilities Commission (CPUC) to initiate construction activities for the Project. SDG&E stated that it intended to construct the Project in accordance with the descriptions provided in the Final IS/MND. The information provided in Sections 1.5 and 1.7 of the Final IS/MND include specific details pertaining to construction methods, procedures for removing and installing poles and conductors, and material staging and storage.

SDG&E's NTP request letter stated that construction of the Project is scheduled to begin in July 2019 and is scheduled to be completed by approximately April 2020. Subsequent discussions with SDG&E during preparation of the MMCRP identified a more detailed construction schedule that provides estimated dates and durations for specific construction phases/activities; refer to Appendix B, Table 3, of the MMCRP for this detailed schedule.

Under separate cover, SDG&E submitted the following materials pursuant to MMs identified in the Project's Final IS/MND:

- Environmental Training Manual (MM-BIO-3)
- Resumes of Biological Monitors (MM-BIO-16)
- Noise Complaint Procedures (MM-NOI-3)
- Construction Noise Management Plan (MM-NOI-5)

- Vibration Assessment (MM-NOI-6)

The above materials are approved.

SDG&E must submit to CPUC the following documentation between the NTP and start of construction:

- Burrowing Owl Monitoring and Management Plan (MM-BIO-17), and approval response from the California Department of Fish and Wildlife
- Protocol Surveys for Quino Checkerspot Butterfly (MM-BIO-21), and response, if any, from the U.S. Fish and Wildlife Service
- Unanticipated Contaminated Soil Handling Plan (MM-HAZ-3)
- Final Project Contact List for the MMCRP
- Geotechnical Investigation into Design Level Geotechnical Design Report (MM-GEO-1)

## **2. CPUC Review of the NTP Request Letter and Mitigation Measure Compliance Documentation Submitted to Date**

In accordance with its authority as the Lead Agency under the California Environmental Quality Act (CEQA), CPUC reviewed SDG&E's NTP request letter and associated submittal materials to ensure that the requested activities are consistent with what was evaluated in the Final IS/MND, and that the MMs identified in the IS/MND's Mitigation Monitoring and Reporting Program (MMRP) commensurate with the current phase of the Project are being fully implemented. CPUC's review has indicated that SDG&E's requested activities are consistent with the Final IS/MND, and that all of the plans, reports, and associated documentation submitted to date are adequate and in accordance with the Project's MMRP (see Attachment 1). Attachment 1 to this NTP letter is the current version of MMCRP Appendix C: Mitigation Measures Tracking Table. This table documents the status of specific monitoring and reporting actions that were identified in the MMRP, and will be continuously updated throughout the Project compliance period.

## **3. NTP Conditions of Approval**

Due to the concurrent nature of many of the construction activities, only one NTP will be issued for this Project. Therefore, this NTP applies to the entirety of the Project and all work areas identified in MMCRP Appendix A. SDG&E's NTP request is approved by the CPUC with the following conditions:

1. All Project MMs, permit conditions, and applicable regulatory requirements shall be fully implemented. Specifically, all pre-construction monitoring and reporting actions identified in MMCRP Appendix C (see Attachment 1; pre-construction actions are identified by red coding) shall be completed by SDG&E, and verified as completed by CPUC, prior to initiation of any construction activities.
2. The Project MMCRP must be fully implemented, and the protocols and procedures identified in the MMCRP must be followed prior to, during, and following Project construction.

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3. Any minor refinements to the Project design must be described fully in a Minor Project Refinement Form (MMCRP Appendix F). CPUC must review and approve the completed Minor Project Refinement Form prior to SDG&E constructing the modified Project elements. Requirements for minor project refinements (e.g., may not result in new significant impacts or impacts not evaluated in the Final IS/MND) are described in the MMCRP.
4. Prior to construction, SDG&E must submit all applicable permits to the CPUC.
5. Copies of all relevant permits, compliance plans, the MMCRP, and this NTP shall be available on site for the duration of construction activities.

Please contact me at (916) 327-6782 or [John.Forsythe@cpuc.ca.gov](mailto:John.Forsythe@cpuc.ca.gov) if you have any questions or concerns regarding this NTP.

Sincerely,



John Edward Forsythe, AICP  
Senior Environmental Planner  
Energy Division, CEQA Unit

cc: Molly Sterkel, CPUC Program Manager  
Lonn Maier, CPUC Supervisor  
Jason Reiger, CPUC Attorney  
Tom Engels, Horizon Water and Environment  
Eric Christensen, Horizon Water and Environment

**Attachment 1:** MMCRP Appendix C, Mitigation Measure Tracking Table (Current Version)