

Kirstie Reynolds
Team Lead – Environmental Project Management
San Diego Gas & Electric Company
1010 Tavern Road, SD 1116
Alpine, CA 91901
(T) XXX-XXX-XXXX
(C) XXX-XXX-XXXX
(F) XXX-XXX-XXXX

October 16, 2017

Lisa Orsaba Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Notice to Proceed (NTP) Request #9 to Conduct Geotechnical Investigations on the Transmission Line (TL) 625D and TL629A Components of the Cleveland National Forest Power Line Replacement Projects (Project)

Dear Ms. Orsaba:

On May 26, 2016, the California Public Utilities Commission (CPUC) granted San Diego Gas & Electric Company (SDG&E) a Permit to Construct the Project (Decision 16-05-038). The decision conditionally authorizes construction of the Project with the implementation of pre-construction mitigation measures (MMs) identified in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). A Notice of Determination was submitted to the State Clearinghouse on May 31, 2016, indicating the CPUC's approval of the Project. In addition, the following agencies issued permits and Records of Decision (RODs) to indicate their approval of the Project:

- The United States Forest Service (USFS) issued a Final ROD on March 11, 2016 and Master Special Use Permit on September 19, 2016.
- The Bureau of Land Management issued a Final ROD on September 28, 2016.
- The Bureau of Indian Affairs issued a Final ROD on March 30, 2016.

Activity Summary

SDG&E is formally requesting authorization from the CPUC to conduct geotechnical investigations on the TL625D and TL629A components of the Project in order to complete the final engineering design. Geotechnical borings and seismic refraction surveys for TL629A were previously approved by the CPUC and conducted between April 27 and June 6, 2016 in accordance with the CPUC concurrence letter dated April 12, 2016. To complete the final design for TL625D and TL629A, additional seismic refraction surveys and geotechnical borings are required. SDG&E is proposing to conduct nine seismic refraction surveys and 10 geotechnical borings along TL625D, and nine seismic refraction surveys and 12 geotechnical borings along segment TL629A.

Attachment A: NTP #9 Components Map depicts the locations of the seismic refraction surveys and the geotechnical borings for each component. These geotechnical investigations are being conducted in accordance with MM PHS-7 of the Project's MMCRP in order to complete the pre-construction requirement for the reconstruction of TL625D and TL629A.

The geotechnical borings will be performed within existing disturbed areas and along existing roadways. The seismic refraction surveys may occur in vegetation, but no ground disturbance or vegetation clearing will occur and the seismic refraction sites will be accessed on foot. Public roads and other existing access roads will be used to access the geotechnical investigation sites. All geotechnical investigation sites will be micro-sited in the field to ensure no impacts to sensitive resources and native vegetation will occur. Traffic control signage and other devices will be employed as required by San Diego County-approved traffic control plans to ensure the safety of workers and motorists when working in or adjacent to the public roads. Geotechnical investigations along TL625D and TL629A are anticipated to take approximately two months and will begin in November/December 2017 and end in December 2017/January 2018.

Geotechnical Borings

A total of 10 and 12 geotechnical borings are proposed along the TL625D and TL629A alignments, respectively. Geotechnical borings consist of drilling a six- to eight-inch-diameter hole using a hollow-stem auger attached to a drill rig. The borings will have varying depths, depending on subsurface conditions, but will generally not exceed 30 feet. Upon completion of the borings, the holes will be backfilled.

The borings will be completed using a rubber-tired, truck-mounted drill rig, which is approximately eight feet wide by 30 feet long; or a rubber-tracked, limited access drill rig, which is approximately four feet wide by 17 feet long. The boom on the drill rig will extend to a height of approximately 30 feet during drilling. A small pickup truck or a similar vehicle will also be on site for the environmental and cultural monitors. During drilling, there will likely be three to five workers on site, included a driller, a driller's assistant, an engineer or geologist, and biological and cultural monitors as needed. The total work area required to complete the borings will measure approximately 15 feet wide by 40 feet long. Each boring will take three to eight hours to complete, depending on subsurface conditions.

Seismic Surveys

A total of nine seismic refraction surveys are proposed to occur along TL625D, and nine seismic refraction surveys are also proposed to occur along TL629A. Seismic refraction surveys consist of linearly arranging a series of P-wave geophones along the ground surface in the area to be investigated. A wave source is generated by striking a sledgehammer against a small metal plate at one end of the geophones. Wave data are then recorded by the geophones along the alignment, and a subsurface profile is generated. Seismic surveys require no ground disturbance, and sites will be left in the same condition as previously encountered.

A small pickup truck or similar vehicle will be used to access seismic survey locations; however, this vehicle will remain on previously disturbed roads or will be parked on nearby access roads, and equipment will be walked into the sites. There will likely be two to three personnel on site

during the surveys, plus biological and cultural monitors as needed. Each seismic survey will take two to three hours to complete, depending on site conditions.

Pre-Construction Mitigation Measures

A list of all of the pre-construction MMs identified in the MMCRP that are relevant to geotechnical investigations are provided in Table 1: Pre-Construction Status Report. To facilitate tracking and implementation, each MM has been organized by completion status with notes on pending and complete MMs as applicable. No geotechnical work will occur until all of the applicable pre-construction MMs have been fulfilled.

SDG&E respectfully requests authorization of this NTP request by November 13, 2017 in order to begin geotechnical investigations along TL625D and TL629A and meet the overall Project schedule. Should you have any questions or need additional information, please do not hesitate to contact me at XXX-XXXX-XXXX.

Sincerely,

Kirstie Reynolds

Team Lead – Environmental Project Management

SDG&E

Attachment A: NTP #9 Components Map

cc: Allison Rice, Dudek

Kjistii Reynolds

Anna Bischoff, Dudek

Keith Carwana, Dudek

David Hochart, Dudek

Brad Aughinbaugh, USFS

KD Tyree, USFS

Tim Knowd, SDG&E

Edith Moreno, SDG&E

Jennifer Kaminsky, SDG&E

Heidi Waitley, SDG&E

Jim Vanlandingham, SDG&E

Rachel Ruston, SDG&E

Anne Marie McGraw, Insignia Environmental (Insignia)

Fred Bauermeister, Insignia

Jeff Coward, Insignia

Kevin Kilpatrick, Insignia

Erin Tomaras, Insignia

Table 1: Pre-Construction Status Report

| Completion Status | MM/Applicant-Proposed Measure (APM) | Status Notes | |
|----------------------|-------------------------------------|--|--|
| Complete | APM CUL-02 | Cultural resources surveys were completed during the initial survey in 2011, as well as during 2008, 2009, and 2017 surveys. | |
| | APM CUL-06 | The Historic Properties Management Plan was finalized on August 25, 2016, and was approved by the USFS on August 25, 2016, and by the CPUC and State Historic Preservation Officer on August 26, 2016. | |
| | MM HYD-2a | The Water Supply Plan was approved by the USFS on June 28, 2016 and the CPUC on August 11, 2016; an updated plan without references to specific transmission lines was submitted to the CPUC and USFS on Ma 8, 2017 (no approval was required); and an updated plan with three additional water sources was submitted to the CPUC and USFS on April 2017 (no approval was required). | |
| | MM HYD-2b | The final Live Oak Springs Water District Groundwater Evaluation was submitted to the CPUC for approval on March 22, 2017; the CPUC approved the evaluation on March 30, 2017; and an updated Water Supply Plan that includes the Live Oak Springs Water District was submitted to the CPUC and USFS on April 7, 2017 (no approval was required). | |
| | MM PHS-2 | The Spill Response and Notification Plan was approved by the USFS on July 21, 2016 and by the CPUC on July 18, 2016. | |

| Completion Status | MM/Applicant-Proposed Measure (APM) | Status Notes |
|----------------------|--|---|
| Not Applicable | MM VIS-1, MM VIS-2, APM-BIO-02, APM BIO-05, APM-BIO-06, APM-BIO-07, APM BIO-08, MM BIO-4, MM BIO-7, MM BIO-9, MM BIO-10, MM BIO-11, MM BIO-12, MM BIO-13, MM BIO-15, MM BIO-18, MM BIO-19, MM BIO-31, MM BIO-33, APM CUL-08, MM CUL-2, APM HYD-04, APM HYD-05, MM HYD-4, MM HYD-6, MM HYD-7, MM LU-2, MM LU-3, MM LU-4, MM PHS-3, MM PHS-4, MM PHS-7, MM PSU-1, MM REC-1, and APM TRANS-06 | These measures are not applicable to the geotechnical investigations on TL625D and TL629A. |
| Pending | MM BIO-1, MM BIO-14, MM BIO-16, and MM BIO-21 | Geotechnical borings will not impact special-status plant species or special-status butterfly host species due to micro-siting in existing disturbed areas and access roads to avoid native vegetation. While the seismic refraction surveys may occur in vegetation, no ground disturbance will occur. SDG&E will comply with the Low-Effect Habitat Conservation Plan for Quino checkerspot butterfly (QCB), and a CPUC- and USFS-approved biological monitor will be on site to monitor initial ground-disturbing activities. A Sensitive Resources Map depicting geotechnical investigations sites, temporary restricted access signs, special-status plant occurrences, special-status butterfly host plant occurrences, locations of fencing/flagging to protect plant species, and occupied/potential QCB and Hermes copper butterfly habitat will be submitted to the CPUC and USFS on October 16, 2017. Fencing and/or flagging will occur immediately prior to the geotechnical investigations. The geotechnical investigations along TL625D and TL629A are scheduled to occur from November/December 2017 to December 2017/January 2018. |

| Completion Status | MM/Applicant-Proposed Measure (APM) | Status Notes | |
|----------------------|-------------------------------------|--|--|
| Pending (cont.) | MM BIO-17 | Notification of planned butterfly and host plant surveys was provided during the weekly Construction Status meetings with the CPUC and USI Qualified biologists approved by the USFS and CPUC conducted protoc level special-status butterfly surveys along TL625D and TL629A in 2017 There is no habitat along both components to support Laguna Mountains skipper. The 2017 QCB Focused Survey Report for TL625D was submitted to the United States Fish and Wildlife Service on June 27, 201 and the CPUC, USFS, and California Department of Fish and Wildlife (CDFW) on July 11, 2017. The 2017 Hermes Copper Butterfly Focused Survey Report for TL625D and TL629A will be submitted to the CDFW CPUC, and USFS on October 16, 2017. | |
| | APM BIO-09 and MM-BIO-30 | A literature review and follow-up surveys for potential bat roosts were conducted by CPUC- and USFS-approved bat biologists in 2017. No Townsend's big-eared bats were detected within 500 feet of Project work areas. Active and potential roost sites of other bat species were identified; however, geotechnical investigations will occur outside of maternity season so there will be no impacts to maternity roosting bats. Additionally, no winter hibernation roosts were identified so there will be no impacts to winter hibernating bats. The bat roost survey report will be submitted to th CDFW, CPUC, and USFS on October 16, 2017. | |
| | MM CUL-01 and MM CUL-3 | A mapbook identifying all Environmentally Sensitive Areas to be flagged and avoided during the geotechnical investigations will be provided to the CPUC and USFS on October 16, 2017. | |

| Completion Status | MM/Applicant-Proposed Measure (APM) | Status Notes |
|---|--|---|
| Pending (cont.) | APM GEN-06, APM-NOI-01, and MM LU-1 | The Construction Notification Plan was approved by the USFS on June 16, 2016 and by the CPUC on June 17, 2016. An updated Construction Notification Plan with a list of landowners that are adjacent to the TL625D and TL629A geotechnical investigation sites will be submitted to the CPUC prior to conducting the geotechnical investigations. The public venue notice, public mailer, and newspaper advertisements were submitted to the CPUC and USFS for approval on September 21, 2017. The CPUC approved the notices on October 5, 2017 and the USFS approved the notices on October 10, 2017. The public venue notice for TL625D and TL629A was posted at various locations adjacent to the alignments on October 12, 2017. Posting of the public venue notice was documented in an email to the CPUC and the USFS on October 13, 2017. The public mailer will be sent out 15 days prior to conducting the geotechnical investigations. The certification of mailing will be submitted to the CPUC and the USFS prior to conducting the geotechnical investigations. The newspaper advertisement will run in various newspapers 15 days prior to conducting the geotechnical investigations. |
| To be Implemented During Construction | MM BIO-3, MM BIO-6, MM BIO-20, MM BIO-22, MM BIO-24, MM BIO-26, MM BIO-27, MM FF-1, and MM HYD-1 | These measures will be implemented during the geotechnical investigations on TL625D and TL629A. |
| To be Implemented Immediately Prior to Construction | MM BIO-2, MM BIO-28, APM CUL-01, APM CUL-03, APM-GEN-07, and MM PHS-01 | These measures will be implemented immediately prior to conducting during the geotechnical investigations on TL625D and TL629A. |

ATTACHMENT A: NTP #9 COMPONENTS MAP































































