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

Re: Notice to Proceed (NTP) Request #18 to Conduct Geotechnical Investigations on the Circuit (C) 79A Component of the Cleveland National Forest Power Line Replacement Projects (Project)

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) and applicant-proposed measures (APMs) 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 or Records of Decision (RODs) to indicate their approval of the Project:

- The United States (U.S.) Forest Service (USFS) issued a Final ROD on March 11, 2016 and a 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 and an Amended ROD on December 15, 2017.

## **Activity Summary**

SDG&E is formally requesting authorization from the CPUC to conduct geotechnical investigations along Lookout Road on the C79A component of the Project to complete the final engineering design. SDG&E is proposing to conduct eight geotechnical borings along C79A. On February 12, 2016, the CPUC and the USFS approved the initial request to conduct geotechnical investigations along C79, which included 10 seismic surveys and eight geotechnical borings. The seismic surveys were completed in February and March 2016, but the geotechnical borings were not completed because of a pending Right-of-Entry (ROE) Permit to Cuyamaca Rancho State Park from the California Department of Parks and Recreation. The ROE Permit is

<sup>&</sup>lt;sup>1</sup> The locations of the eight geotechnical borings requested on C79A have moved slightly from what was requested in February 2016.

expected to be issued in July 2018, and work on the geotechnical investigations will not commence until the permit is issued.

Attachment A: NTP #18 Components Map depicts the locations of the geotechnical borings for C79A. 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 C79A.

The geotechnical borings will be performed within existing, disturbed areas and will be micro-sited in the field to ensure that no impacts to sensitive resources and native vegetation will occur. Public roads and other existing access roads will be used to access the geotechnical investigation sites. Traffic control signage and other devices will be employed as required by County of San Diego-approved traffic control plans to ensure the safety of workers and motorists when working on or adjacent to public roads. Geotechnical investigations along C79A are anticipated to take approximately one month and are scheduled to begin in August/September 2018 and end in September/October 2018.

## **Geotechnical Borings**

Geotechnical borings consist of drilling a six- to eight-inch-diameter hole using a hollow-stem auger attached to a drill rig. Soil samples will be collected at regular intervals during drilling. The borings will be completed to varying depths, depending on subsurface conditions, but will generally not exceed 50 feet. Upon completion of the borings, the holes will be backfilled. Ground disturbance will be limited, and the ground surface will be restored to pre-investigation conditions to the extent possible.

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 maximum height of 30 feet during drilling. A standard-sized pickup truck will be parked as close to the drill rig as possible. A couple of standard-sized pickup trucks or similar vehicles will also be on site for the biological and cultural monitors. During drilling, three to five workers will be on site, including 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.

## **Pre-Construction Mitigation Measures**

A list of all of the pre-construction MMs/APMs identified in the MMCRP that are relevant to the geotechnical investigations along C79A is provided in Table 1: Pre-Construction Status Report. To facilitate tracking and implementation, each MM/APM has been organized by completion status, with notes as applicable. No geotechnical work will occur until all of the applicable pre-construction MMs/APMs have been fulfilled.

**Table 1: Pre-Construction Status Report** 

Completion Status	MM/APM	Status Notes	
Complete	APM CUL-02	Cultural resources surveys for the Project were completed during the initial survey in 2011. Subsequent pedestrian surveys on C79A were completed in 2017 and 2018.	
	APM CUL-06	The Historic Properties Management Plan was finalized on August 25, 2016, and was appropriate by the USFS on August 25, 2016, and by the CPUC and State Historic Preservation Officer August 26, 2016.	
	MM HYD-2a	The Water Supply Plan was approved by the USFS on June 28, 2016, and by the CPUC on August 11, 2016; an updated plan without references to specific transmission lines was submitted to the CPUC and USFS on March 8, 2017 (no approval was required); and an updated plan with three additional water sources was submitted to the CPUC and USFS on April 7, 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/APM	Status Notes
Not Applicable	MM VIS-1, MM VIS-2, APM BIO-02, APM BIO-05, APM BIO-06, APM BIO-08, MM BIO-4, 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-17, MM BIO-18, MM BIO-19, MM BIO-31, MM BIO-31, MM BIO-31, MM BIO-34, APM CUL-03, 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 C79A.
Pending	A literature review and follow-up surveys for potential Townsend's big-eared bat roosts are common bat species roosts were conducted by CPUC- and USFS-approved bat biologists in 2018. One non-maternity day roost for common bat species was observed within 100 feet geotechnical investigation site on C79A; however, no common bat maternity roosts were identified within 100 feet of geotechnical investigation sites and no Townsend's big-eared maternity roosts were identified within 500 feet of geotechnical investigation sites. Bat roosts urvey results for C79A geotechnical investigations will be submitted to the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), CPUC, a USFS prior to conducting the geotechnical investigations. A full bat survey report will be submitted prior to the reconstruction of C79A.	

<sup>&</sup>lt;sup>2</sup> A common bat species maternity roost was identified approximately 116 feet northwest of B-1. All work at this location will occur outside of the 100-foot maternity roost buffer.

Completion Status	MM/APM	Status Notes
Pending (cont.)	MM BIO-1, MM BIO-14, MM BIO-16, and MM BIO-21	The geotechnical investigations will not impact special-status plant species or special-status butterfly host species due to micro-siting in existing, disturbed areas to avoid native vegetation. Suitable and occupied habitat for Hermes copper butterfly (HCB) occurs on C79A, but does not occur near the geotechnical investigation sites. Individuals were observed during the 2016 protocol-level surveys and have also been observed during the 2018 protocol-level surveys, which are currently underway. A CPUC- and USFS-approved biological monitor will be on site to monitor initial ground-disturbing activities. A Sensitive Resources Map will be submitted to the CPUC and USFS on July 6, and the map will depict geotechnical investigation sites, temporary restricted access signs, special-status plant occurrences, special-status butterfly host plant occurrences, the locations of fencing/flagging to protect plant species, and suitable and occupied HCB habitat. Because the 2018 special-status plant surveys and 2018 HCB surveys are currently underway, only the special-status plant species that have been identified during the spring surveys and the HCB observations to date will be included in the Sensitive Resources Map. A geographic information system map package with the locations of special-status plants and special-status butterfly host plants will be submitted with the Sensitive Resources Map. Fencing and/or flagging will occur immediately prior to conducting the geotechnical investigations. The geotechnical investigations are scheduled to occur from August/September 2018 to September/October 2018.
	MM CUL-01 and MM CUL-3	A mapbook identifying the locations of Environmentally Sensitive Areas (ESAs) near the geotechnical investigations on C79A will be provided to the CPUC and USFS prior to conducting the geotechnical investigations. No geotechnical investigations are located within 50 feet of a cultural resource and no ESA fencing will be installed.

Completion Status	MM/APM	Status Notes
Pending (cont.)	APM GEN-06, MM LU-1, and APM NOI-01	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 adjacent to the C79A geotechnical investigation sites will be submitted to the CPUC and USFS 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 June 27, 2018. The public venue notice for C79A geotechnical investigations will be posted at various locations adjacent to the alignments prior to conducting the geotechnical investigations. Posting of the public venue notice will be documented in an email to the CPUC and USFS. 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 USFS prior to conducting the geotechnical investigations. The 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 C79A.
To be Implemented Immediately Prior to Construction	APM BIO-07, MM BIO-2, MM BIO-28, APM CUL-01, APM GEN-07, and MM PHS-1	These measures will be implemented immediately prior to conducting the geotechnical investigations on C79A.

SDG&E respectfully requests authorization of this NTP request by July 27, 2018 in order to begin geotechnical investigations along C79A and meet the overall Project schedule. Should you have any questions or need additional information, please do not hesitate to contact me at XXX-XXX-XXXXX.

Sincerely,

Kjustii Reynolds

Kirstie Reynolds Team Lead – Environmental Project Management SDG&E

Attachment A: NTP #18 Components Map

cc:

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## ATTACHMENT A: NTP #18 COMPONENTS MAP













