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October 30, 2019

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

Re: Notice to Proceed (NTP) Request #24 to Reconstruct the Transmission Line (TL) 6923  
Component 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) 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 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.
- The California Department of Parks and Recreation issued a Right-of-Entry Permit on March 1, 2019.

## Activity Summary

SDG&E is formally requesting authorization from the CPUC to begin reconstruction of TL6923 (Barrett Substation to Cameron Substation). Reconstruction will include the following:

- removal of existing underground cable at the Barrett Substation;
- replacement of 138 existing wood transmission and distribution poles with weathered steel poles and other appurtenant equipment;
- reconductoring of the existing 12 kilovolt (kV) and 69 kV conductors;
- removal of eight existing wood poles and the existing conductor;
- installation of five new weathered steel poles and other appurtenant equipment;
- pole-top work at six structures; and
- use of the North Sol Valley Ranch Staging and Fly Yard and South Sol Valley Ranch Staging and Fly Yard, as well as other refinement areas, which are identified in Attachment A: Minor Project Refinement Request.

Reconstruction of TL6923 will also include access road maintenance and the establishment of temporary work areas associated with pole-replacement activities. Public and established private roads (e.g., community/named access roads), as well as identified navigation and construction-only access roads, will be used for travel to and from the Project work areas and for various construction activities (e.g., parking, pole staging, temporary material laydown, and stringing). Community/named access roads, which are existing community roads that are regularly maintained by other entities (e.g., the County of San Diego, landowners), may require repair and/or maintenance throughout construction.<sup>1</sup> Some construction-only access roads may require vegetation trimming and/or minor grading. In addition, excavated material (i.e., spoils) may be temporarily spread onto nearby construction-only access roads. New, temporary construction-only access roads will be returned to near pre-construction conditions upon completion of the reconstruction of TL6923. During construction, SDG&E will minimize impacts to natural areas to the fullest extent feasible by utilizing existing bare ground areas for construction along the Project alignment. All activities required for the reconstruction of TL6923 will be consistent with Section B: Project Description in the Project's Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS).

SDG&E may need to conduct minor tree trimming prior to energization of the line in order to utilize access roads and to maintain the energized wire-to-vegetation clearances that are required for compliance with CPUC General Order 95. No ground disturbance will be conducted during the trimming activities. Vegetation crews will walk to each tree, climb the tree, and trim the

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<sup>1</sup> Some of the larger community/named access roads are specifically delineated in Attachment B: NTP #24 Components Map. Some of the smaller community/named access roads (i.e., private driveways) are depicted as navigation access roads because no repairs or maintenance are anticipated at this time; however, repairs or maintenance could occur during construction and will follow the appropriate notification process with the CPUC and USFS if necessary.

necessary branches. Depending on the size and the amount of the vegetation cut, the material will be either left on site in the right-of-way or carried out to the closest workspace and chipped. If individual trees are found to be dead or dying, the entire tree may be removed.

Activities at the North Sol Valley Ranch Staging and Fly Yard and South Sol Valley Ranch Staging and Fly Yard will include helicopter staging, take-off, and landing, as well as parking, fueling, and storage of construction materials and equipment. These yards will be active for approximately 12 months. Use of the yards will be consistent with Section B: Project Description in the Project's Final EIR/EIS.

Attachment A: Minor Project Refinement Request of this NTP request describes and analyzes the environmental impacts of the changes between the final engineering for TL6923 and the 2015 baseline data<sup>2</sup>, provides justification for why these changes are needed, and includes a comparison mapbook of the changes. The refinements included in the Minor Project Refinement (MPR) request are incorporated into Attachment B: NTP #24 Components Map and Attachment C: Pre-Construction Status Report.

Attachment B: NTP #24 Components Map depicts previously approved components, pole removal/replacement sites, new steel pole sites, pole-top work-only sites, stringing sites, staging and fly yards, existing underground, and access roads required to reconstruct TL6923, as described by the Project's Final EIR/EIS and Attachment A: Minor Project Refinement Request.<sup>3</sup>

Table 1: Temporary Impact Acreage provides the temporary impacts associated with all work areas for TL6923. Upon completion of construction activities on TL6923, all areas of temporary disturbance will be recontoured and restored to pre-construction conditions to the extent practicable. Clean-up work will include the removal of any temporary facilities not required for other approved Project activities, as well as collection and proper disposal of any waste, trash, or debris.

The reconstruction of TL6923 is anticipated to take approximately 12 months from initial mobilization through construction completion, beginning in November/December 2019 and ending in November/December 2020.

### **Pre-Construction Mitigation Measures**

A list of all pre-construction MMs/APMs identified in the MMCRP that are relevant to TL6923 is provided in Attachment C: Pre-Construction Status Report of this NTP request. To facilitate tracking and implementation, each MM/APM has been organized into tasks so that the various elements of each MM/APM can be tracked separately. Attachment C: Pre-Construction Status Report provides the full text of each MM/APM for TL6923, as well as the corresponding completion status with details. No construction work will occur until all of the applicable pre-construction MMs/APMs are fulfilled.

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<sup>2</sup> In April 2015, SDG&E submitted responses to the CPUC's Data Request #10, which included route maps for each segment of the Project. Attachment B.5: TL6923 Route Map depicted the approved baseline components for TL6923.

<sup>3</sup> Public and established private roads that will be used for construction are not specifically identified in Attachment B: NTP #24 Components Map; however, access roads approved or requested for Project use are shown.

**Table 1: Temporary Impact Acreage**

Temporary Impact Location	Approximate Impacts (Acres)		
	Native Vegetation <sup>4</sup>	Non-Native Grassland	Agricultural/Disturbed/Developed/Bare Ground
Access Roads <sup>5</sup>	0.20	0.01	10.60
Anchor Work Areas	0.05	--	0.04
Pole Work Areas	4.40	0.11	6.08
Stringing Sites	0.78	--	0.78
Temporary Access/Entry/Turnaround	--	--	0.10
North Sol Valley Ranch Staging and Fly Yard	--	--	4.67
South Sol Valley Ranch Staging and Fly Yard	--	--	12.09
<b>TL6923 Total<sup>6</sup></b>	<b>5.43</b>	<b>0.12</b>	<b>34.37</b>
<b>Project Total to Date<sup>7</sup></b>	<b>62.32</b>	<b>32.97</b>	<b>253.55</b>

SDG&E respectfully requests authorization of this NTP request by November 13, 2019 in order to begin construction activities along TL6923 and meet the overall Project schedule. Should you have questions or need additional information, please do not hesitate to contact me at XXX-XXX-XXXX.

<sup>4</sup> Temporary impacts to native vegetation along TL6923 include approximately 0.59 acre of chamise chaparral, 2.15 acres of Diegan coastal sage scrub, 0.06 acre of mixed oak woodland, 0.24 acre of native grassland, 0.07 acre of oak savanna, 2.31 acre of southern mixed chaparral, and less than 0.01 acre of southern riparian forest.

<sup>5</sup> SDG&E uses three types of access roads—maintained, navigation, and construction-only. Construction-only access roads can sometimes require improvements and maintenance, which create temporary impacts to vegetation.

<sup>6</sup> Impact totals resulting from changes between the final engineering for TL6923 and the 2015 baseline data can be found in Attachment A: Minor Project Refinement Request.

<sup>7</sup> The total temporary impact acreage for the Project includes TL6923; the Post-Construction Report (PCR) impacts for Circuit (C) 78, C442, TL6931, and TL625B; and all other pending and approved Workspace Adjustments, MPRs, and NTPs. Temporary impacts due to outrigger adjustments, deviations, and non-compliances are totaled and included in the PCR for each component. Note that this total will continue to change as PCR impacts are reconciled for each line. This is because the vegetation layer used to calculate impacts for the Final EIR/EIS and the NTPs/MPRs is more generalized than the detailed impacts collected in the PSRs/PCRs. Therefore, some impacts may have been overestimated.

Sincerely,



Kirstie Reynolds  
Project Manager II  
SDG&E

Attachment A: Minor Project Refinement Request  
Attachment B: NTP #24 Components Map  
Attachment C: Pre-Construction Status Report

cc:

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**ATTACHMENT A: MINOR PROJECT REFINEMENT REQUEST**

