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May 14, 2018

Andrew Barnsdale  
California Public Utilities Commission, Energy Division  
505 Van Ness Avenue  
San Francisco, CA 94102-3298  
(415) 703-2579

RE: Notice to Proceed (NTP) 1 Request for South of Palermo Reinforcement Project

Dear Mr. Barnsdale

On June 10, 2018, the California Utilities Commission (CPUC) voted to grant Pacific Gas & Electric Company (PG&E) a Permit to Construction (Proceeding A1604023) for the South of Palermo Reinforcement Project (SOP Project) contingent on implementation of the Mitigation Monitoring, Compliance and Reporting Program (MMRCP). PG&E is formally requesting a Notice to Proceed (NTP) from the CPUC to begin construction of the project elements described below. The following information is provided demonstrate how PG&E will adhere to the MMRCP and resource agency permit requirements.

The following attachments are enclosed to support this request.

Attachment A: Project Maps  
Attachment B: Project Schedule  
Attachment C: Site Specific Measures  
Attachment D: Pre-construction Submittals

## **1. Location and Activities Included in NTP 1 Request**

As described in the Final Initial Study/Mitigated Negative Declaration (MND), the SOP Project involves replacing existing conductor and modifying/replacing existing structures along approximately 60 miles of PG&E's existing Palermo-Rio Oso 115 kV transmission system as identified in **Attachment A**. The project will be built in overlapping phases over the course of 36 – 48 months. The project components within each phase have been determined by a number of factors, including the timing of permit approvals, permit conditions, and other constructability factors.

This Request for NTP 1 covers the first phase of construction beginning on July 2, 2018, and concluding by September 30, 2019, as illustrated in the constructability schedule included as **Attachment B**. A KMZ of the alignment, all work areas, and access routes will be provided separately as part of the NTP 1 package to the CPUC. The first phase of work does not include any areas that contain habitat for the two federally listed species analyzed in the MND. As such, the first phase of construction involves work outside of areas where the two listed species (e.g. branchiopods and giant garter snake) may be impacted. As PG&E already has coverage for potential impacts to valley elderberry longhorn beetle

(VELB) under an existing programmatic consultation, NTP 1 will include some areas that may contain VELB habitat.

Work under NTP 1 would take place at select locations along the Bogue Sub Line Segment, the Pease Sub Line Segment, and the South of Palermo Line. The work proposed would include the following categories:

*Prepare work areas and access routes:* This work would be conducted on a rolling basis approximately two weeks prior to work foundation work at each location. As described in the MND, this work typically includes some mowing and minor repairs to existing access routes. The locations of the work areas for the first phase of work are identified in Attachment B.

*Winterize work areas, pullsites, and landing zones:* This work would be conducted as soon as possible following the NTP and be completed prior the start of the wet season (identified as October 15 but may be extended depending on weather conditions). As described in the MND, winterization typically includes temporary gravelling and installation of erosion control/GGS exclusion fencing, as appropriate for each location to help protect the site during the winter. The locations of the winterized areas for the first phase of work are identified in Attachment B.

*Install/modify foundations:* This work would be conducted on a rolling basis following the preparation of work areas and access routes described above. As described in the MND, this work would generally involve excavation for installation of direct bury pole butts and poured foundations. Activities would take place in the work areas established as described above.

*Install tops and extensions:* This work would be conducted on a rolling basis in the work areas described above following the completion of foundation work and the availability of line clearances. It is anticipated that some of the work can be completed by crane during the dry season with limited line clearances. This work generally involves using cranes or helicopter to install the metal structures on the direct bury pole butts and poured foundations described above. Most of the work would likely be conducted by helicopter in the fall or winter when line clearances are more easily secured.

*Reconductor:* This work would be conducted from the winterized work areas, pull sites, and landing zones described above following installation of tops and extensions. Reconductoring involves the use of pull sites to remove old conductor and install new conductor. Reconductoring is scheduled for the fall and winter when longer lines clearances can be secured. The spans to be reconducted during this phase of work are identified in Attachment B.

*Remove foundations and restore:* This work will be conducted as soon as possible following structure installation and reconductoring. This work generally involves excavating foundations below surface and hydro seeding to reestablished disturbed work areas. The locations of the work areas for the first phase of work are identified in Attachment B.

## **2. MMRCP Applicant Proposed Measures (APMs) and mitigation measures**

The MMRCP identifies two types of requirements: (1) those that must be completed prior to the start of any construction activities; and (2) those that must be implemented prior to the construction of activities at each location. Site-specific measures are identified in **Attachment C**. Most of the pre-construction

submittals identified in Table 2 are included in **Attachment D**. Those listed as forthcoming will be submitted prior to the start of construction. The measures identified in Table 2 will be completed on an ongoing basis during construction.

Table 1: MMRCP Preconstruction Submittals

Measure	Compliance Action/Submittal	Status
APM AG-1	Landowner notification and summary of compensation	Included in Attachment D
APM AQ-1	Fugitive Dust Control Plan to FRQAMD	Included in Attachment D
APM AQ-2	Available documentation of equipment compliance	Included in Attachment D
APM AQ-2	Fugitive dust notice and contact sign	Included in Attachment D
APM AQ-3	Receipt of FRAQMD offsite mitigation credits	Included in Attachment D
APM BIO-1	Resumes of qualified biologists	Forthcoming
APM BIO-1	Worker Environmental Awareness Training	Included in Attachment D
APM BIO-1	Educational Brochure	Included in Attachment D
APM BIO-4	Resumes of qualified biologists	Forthcoming
APM BIO-11	Resumes of qualified biologists	Forthcoming
APM CR-1	Worker Environmental Awareness Training	Forthcoming
APM CR-1	Resumes of qualified cultural resource specialist	Forthcoming
APM CR-2	Resumes of qualified archaeologists	Forthcoming
APM CR-4	Resumes of qualified paleontologists	Forthcoming
APM GHG-1	Worker Environmental Awareness Training	Included in Attachment D
APM HAZ-1	Worker Environmental Awareness Training	Included in Attachment D
APM HAZ-2	Worker Environmental Awareness Training	Included in Attachment D
APM HAZ-3	Worker Environmental Awareness Training	Included in Attachment D
MM HAZ-1	Fire Risk Management Plan	Included in Attachment D
MM HAZ-1	Worker Environmental Awareness Training	Included in Attachment D
APM HYDRO-1	Storm Water Pollution Prevention Plan	WDID # forthcoming
APM NOI-1	Worker Environmental Awareness Training	Included in Attachment D
APM TRA-2	Helicopter Use Plan	Included in Attachment D

Table 2: MMRCP Ongoing Construction Requirements

Measure	Compliance Action
APM AG-1	Photo documentation: will be included in bi-weekly monitoring reports.
APM AQ-1	FRAQMD standard construction measures: included in environmental awareness training and implemented throughout construction at all locations.
APM AQ-2	BCAQMD construction best practices: included in environmental awareness training and implemented throughout construction at all locations.
APM BIO-2	Preconstruction surveys: since activities in NTP 1 do not occur in GGS or branchiopod habitat, preconstruction surveys for listed species will be limited to those areas with the potential for VELB based on review of existing environmental constraints maps. The locations for the surveys are indicated in Attachment C.
APM BIO-3	Identification and marking of sensitive resources near work areas as required based on review of environmental constraints maps and APM BIO-2 surveys. The locations for the surveys are indicated in Attachment C.
APM BIO-4	Biological monitoring: since activities in NTP 1 do not occur in GGS or branchiopod habitat, monitoring will be limited to those instances when work is performed in the vicinity of nesting birds. In most cases, those areas will most likely be marked and avoided.

APM BIO-6	Avoid impacts to vernal pool species: Activities under NTP 1 will avoid all impacts to vernal pool species.
APM BIO -8	VELB will be identified during implementation of APM BIO-2 and APM BIO-3. Compensation, if required, will be in accordance with PG&E's VELB Conservation Program.
APM BIO-9	Avoid impacts to GGS: Activities under NTP 1 will avoid ground disturbance within GGS aquatic and upland habitat.
APM BIO-11	Preconstruction bird surveys will be completed within 15 days prior to construction activities occurring between February 15 and August 31. The locations for the surveys are indicated in Attachment C.
APM BIO-12	The project has been designed to avoid impacts to wetlands and NTP 1 does not include any activities within wetlands that require coverage under Nationwide Permit 12. General protection measures will be implemented throughout construction.
MM BIO-1	Although the activities in NTP 1 do not involve impacts to wetland areas that could host special status plants, preconstruction plant surveys will be conducted in May and June 2018, as appropriate, to prepare for NTP 2 activities scheduled for early 2019.
APM CR-2	Resource P-151-000150 is adjacent to one of the work areas identified in Attachment B and will be flagged prior to construction to ensure avoidance.
APM CR-3	Unanticipated discovery protocols will be implemented throughout the project.
APM CR-4	Weekly Paleo spot check monitoring will be implemented throughout foundation installation at locations determined by contract paleontologist.
APM GEO-1	Measures for construction in soft and loose soils have been incorporated into the design.
APM GHG-1	Measures to minimize greenhouse gas emissions: included in environmental awareness training and implemented throughout construction at all locations.
APM HAZ-1	Hazardous Substance Control and Emergency Response: included in environmental awareness training and implemented throughout construction at all locations.
APM HAZ-2	Worker Environmental Awareness and Program: included in environmental awareness training and implemented throughout construction at all locations.
APM HAZ-3	Fire Risk Management: included in environmental awareness training and implemented throughout construction at all locations.
MM HAZ-1	Fire Risk Management Plan: included in environmental awareness training and implemented throughout construction at all locations.
APM HAZ-1	Storm Water Pollution and Prevention Plan: included in environmental awareness training and implemented throughout construction at all locations.
APM NOI-1	Noise Reduction Practices: included in environmental awareness training and implemented throughout construction at all locations.
APM TRA-1	Temporary Traffic Controls: included in environmental awareness training and implemented throughout construction at all locations. Copies of permits to CPUC prior to work in locations requiring permits
APM TRA-2	Air Transit Coordination: aviation contractor will be required to comply with all FAA regulations.
APM TRA-3	Coordinate Road Closures with Emergency Service providers: included in environmental awareness training and implemented throughout construction at locations requiring road closures, as applicable. Road closures are not anticipated for the work described in this NTP.
MM TRA-1	Encroachment permits: Copies of permits to CPUC prior to work in locations requiring permits.

Table 3: MMRCPC Measures NOT applicable to NTP 1

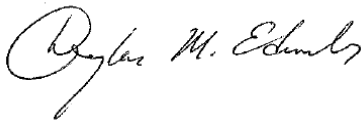
Measure	Explanation
APM BIO-5	Restore habitat for Special Status Species: Since the activities in NTP 1 do not involve impacts to areas that could host special status plants (found in wetlands along project alignment), this measure is not applicable to NTP 1.

APM BIO-7	Compensate for permanent impacts to vernal pool species: Since all impacts to vernal pools will be avoided during NTP 1, this measure is not applicable to NTP 1.
APM BIO-10	Compensate for permanent impacts to GGS: Since all ground disturbances within GGS aquatic and upland will be avoided, this measure is not applicable to NTP 1.
APM BIO-13	Compensate for permanent impacts to wetlands: Since NTP 1 does not involve activities that would permanently impact wetlands, this measure is not applicable to NTP 1.
APM BIO-14	Restore temporarily impacted wetlands: Since NTP 1 does not involve activities that would temporarily impact wetlands, this measure is not applicable to NTP 1.
MM BIO-2	Compensation for impacts to vernal pool habitat: Since all impacts to vernal pools will be avoided, this measure is not applicable to NTP 1.
MM BIO-3	Compensation for impacts to northern hardpan vernal pool habitat: Since all impacts to vernal pools will be avoided, this measure is not applicable to NTP 1.
APM CR-2	Work included in NTP 1 is not in the vicinity of identified resources P-58-001372, P-58001369, PL-Palermo-011H, or Old Marysville Road

#### 4. Preconstruction Kickoff

Following approval of this NTP 1 request, PG&E will schedule a preconstruction kick-off meeting with the CPUC to review the implementation of the project. Should you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,



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