



**Doug Edwards**  
**Senior Land Planner**  
Environmental Management,  
Electric Transmission

2730 Gateway Oaks Drive  
Sacramento, CA 95818  
Office: (916) 203-0304

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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) 2 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 requested a Notice to Proceed (NTP) 1 to cover construction at select locations along the Bogue Sub Line Segment, the Pease Sub Line Segment, and the South of Palermo Line on May 14, 2018. CPUC approval of NTP 1 was received on June 14, 2018.

PG&E is formally requesting a NTP 2 from the CPUC to begin construction of the project elements described below. The following information is provided to establish PG&E's compliance with the MMRCP and resource agency permit requirements.

The following attachments are enclosed to support this request.

Attachment A: NTP 2 Locations  
Attachment B: Project Schedule  
Attachment C: Site Specific Measures  
Attachment D: Submittals

## **1. Location and Activities Included in NTP 2 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. 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 2 covers portions of the first phase of construction beginning on July 2, 2018, and concluding by September 30, 2019, as identified in the figures included as **Attachment A** and the constructability schedule included as **Attachment B**. Work under NTP 2 would take place concurrently with work under NTP 1 at select locations along the Bogue Sub Line Segment, the Pease Sub Line Segment, and the South of Palermo Line. Work locations associated with NTP 2 are shown in blue on

the attachments. A KMZ of the alignment, all work areas, and access routes will be provided separately as part of the NTP 2 package to the CPUC.

The work proposed includes the following categories:

1. *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 NTP 2 are identified in Attachment B.
2. *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 as well as installation of erosion control fencing for giant garter snake (GGS) exclusion fencing, as applicable, to help protect the site during the winter. The locations of the winterized areas for the work covered in NTP 2 are identified in Attachment B.
3. *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.
4. *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. This work generally involves using cranes or helicopter to install the metal structures on the direct bury pole butts and poured foundations described above
5. *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.
6. *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**. All pre-construction submittals identified in Table 1 were submitted with the previous NTP 1 request. The measures identified in Table 2 will be completed on an ongoing basis during construction. Submittals associated with NTP 2 are included in **Attachment D**.

Table 1: MMRCP Preconstruction Submittals

Measure	Compliance Action/Submittal	Status
APM AQ-1	Fugitive Dust Control Plan to FRQAMD	Submitted with NTP 1 request
APM AQ-2	Available documentation of equipment compliance	Submitted with NTP 1 request
APM AQ-2	Fugitive dust notice and contact sign	Submitted with NTP 1 request
APM AQ-3	Receipt of FRAQMD offsite mitigation credits	Submitted with NTP 1 request
APM BIO-1	Resumes of qualified biologists	Submitted with NTP 1 request
APM BIO-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM BIO-1	Educational Brochure	Submitted with NTP 1 request
APM BIO-4	Resumes of qualified biologists	Submitted with NTP 1 request
APM BIO-11	Resumes of qualified biologists	Submitted with NTP 1 request
APM CR-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM CR-1	Resumes of qualified cultural resource specialist	Submitted with NTP 1 request
APM CR-2	Resumes of qualified archaeologists	Submitted with NTP 1 request
APM CR-4	Resumes of qualified paleontologists	Submitted with NTP 1 request
APM GHG-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM HAZ-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM HAZ-2	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM HAZ-3	Worker Environmental Awareness Training	Submitted with NTP 1 request
MM HAZ-1	Fire Risk Management Plan	Submitted with NTP 1 request
MM HAZ-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM HYDRO-1	Storm Water Pollution Prevention Plan	Submitted with NTP 1 request
APM NOI-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM TRA-2	Helicopter Use Plan	Submitted with NTP 1 request

Table 2: MMRCP Ongoing Construction Requirements

Measure	Compliance Action
APM AG-1	Land owner notification, summary or compensation, and photo documentation: A notification list and summary of compensation was submitted with NTP 1 request. NTP 2 activities will not impact agricultural crops so no additional notifications or compensation is required. Photo documentation is included in bi-weekly monitoring reports.
APM AQ-1	FRAQMD standard construction measures: included in environmental awareness training (provided for CPUC review as part of NTP 1) and implemented throughout construction at all locations.
APM AQ-2	BCAQMD construction best practices: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
APM BIO-2	Preconstruction surveys: 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: monitoring will occur at locations identified in Attachment C.
APM BIO-5	Restore habitat for Special Status Plant Species: Preconstruction plant surveys were conducted in May and June 2018 at locations identified in Attachment C. No special status plants were observed. The survey report is included in Attachment D.
APM BIO-6	Avoid and minimize impacts to vernal pool species: Activities under NTP 2 will avoid impacts to vernal pool species. All measures under APM BIO-6 will be implemented during

	construction.
APM BIO -8	VELB will be identified during implementation of APM BIO-2 and APM BIO-3. If VELB habitat is identified and compensation is required, it will be provided in accordance with PG&E's VELB Conservation Program.
APM BIO-9	Avoid and minimize impacts to GGS: Activities under NTP 2 have been designed and planned to avoid or minimize impacts to GGS. All measures under APM BIO-9 will be implemented during construction.
APM BIO-10	Compensate for permanent impacts to GGS: As identified in Attachment C, some activities under NTP 2 will occur in GGS habitat. No permanent impacts will result from activities proposed under NTP 2.
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. The results of the surveys will be documented in the bi-weekly monitoring reports.
APM BIO-12	General protection measures for wetlands and other waters: The project has been designed to minimize impacts to wetlands and other waters of the U.S. NTP 2 activities impacting wetlands and waters of the U.S. have been authorized by the U.S. Army Corps of Engineers (USACE) under Nationwide Permit (NWP) 12 – Utility Line Activities by verification letter (included in Appendix D). The impacts to waters of the State have been authorized by the Central Valley Regional Water Quality District through a 401 water quality certification (included in Appendix D).
APM BIO-13	Compensate for permanent impacts to wetlands: No compensation was required by USACE. Permanent impacts from the project (0.015 acre) are below the 0.1-acre-threshold for mitigation in NWP 12. The USACE verification letter is included in Appendix D.
APM BIO-14	Restore temporarily impacted wetlands: wetlands will be restored in accordance with NWP 12. Pre-construction and post-construction photos will be included in monitoring reports.
MM BIO-1	Preconstruction plant surveys: Preconstruction plant surveys were conducted in May and June 2018 at locations identified in Attachment C. No special status plants were observed. The survey report is included in Attachment D.
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 identified by the contract paleontologist. The paleontologist's resume was provided to the CPUC as part of NTP 1. The results of the monitoring will be documented in the bi-weekly monitoring reports.
APM GEO-1	Measures for construction in soft and loose soils have been incorporated into the design of the project.
APM GHG-1	Measures to minimize greenhouse gas emissions: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
APM HAZ-1	Hazardous Substance Control and Emergency Response: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
APM HAZ-2	Worker Environmental Awareness and Program: Provided training materials with NTP 1 - and implemented throughout construction at all locations.
APM HAZ-3	Fire Risk Management: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
MM HAZ-1	Fire Risk Management Plan: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
APM HAZ-1	Storm Water Pollution and Prevention Plan: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations. The SWPPP (WDID 5S58C383799) was provided with NTP 1.

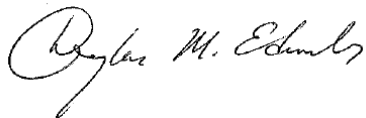
APM NOI-1	Noise Reduction Practices: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
APM TRA-1	Temporary Traffic Controls: included in environmental awareness training (training materials provided with NTP 1) 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 (training materials provided with NTP 1) and implemented throughout construction at locations requiring road closures, as applicable. Road closures are not anticipated for the work described in this NTP 2.
MM TRA-1	Encroachment permits: Encroachment permits associated with NTP 2 are included in Attachment D. H

Table 3: MMRCP Measures NOT applicable to NTP 2

Measure	Explanation
APM BIO-7	Compensate for permanent impacts to vernal pool species: the project will not involve impacts to vernal pool habitat.
MM BIO-2	Compensation for impacts to vernal pool habitat: Since all impacts to vernal pools will be avoided, this measure is not applicable.
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.
APM CR-2	Flag and avoid identified resources: Work included in NTP 2 is not in the vicinity of identified resources P-58-001372, P-58001369, PL-Palermo-011H, or Old Marysville Road

Should you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,



Doug Edwards, PhD, AICP  
Senior Land Planner  
Environmental Management, Electric Transmission