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May 27, 2022

Mr. John Forsythe, AICP  
Project Manager, Energy Division  
California Public Utilities Commission  
300 Capital Mall, 5<sup>th</sup> Floor  
Sacramento, CA 95814

Subject: Humboldt Bay- Humboldt #1 60kV Reconductoring Project  
Notice to Proceed Request #2 for 2022 Construction Scope

Dear Mr. Forsythe:

The California Public Utilities Commission (CPUC) approved the Final Mitigated Negative Declaration (MND) for the Humboldt Bay-Humboldt #1 60 kV Reconductoring Project (Project) and approved the Project in a decision ([A.19-02-004](#)) issued on November 23, 2020. The decision grants PG&E a Permit to Construct (PTC) the Project, and approves the Project conditionally with implementation of avoidance and mitigation measures established in the Mitigation Monitoring Reporting Compliance Program (MMRCP).

On August 11, 2021, the CPUC issued Notice to Proceed (NTP) #1 that approved expansion of workspace at TSP 1a and Pole 77, overland access between poles 57 and 58, and vegetation management activities. On February 2, 2022 PG&E formally requested NTP #2, covering all remaining Project activities in the PTC, and modification of the staging area at Redwood Acres Fairgrounds. On February 24, 2022, the CPUC submitted comments on NTP #2 Request. On May 10, 2022, PG&E submitted a revised NTP #2 Request. On May 20, the CPUC submitted comments. On May 27, 2022, PG&E submitted a revised NTP #2 Request.

PG&E is resubmitting NTP #2 Request in order to:

- respond to the CPUC's February 24 comments
- continue to request approval of the modified Redwood Acres staging area
- Change the 2022 scope of work to only complete the project scope from pole 6 to pole 115 in 2022. The project scope west of pole 6 would be requested and completed after the 2022 construction season.
- Respond to the CPUC's May 20, 2022 comments

The following information is provided to establish PG&E's compliance with the MMRCP and resource agency permit requirements. Attachments in support of this request are:

Re: Humboldt Bay- Humboldt #1 60kV Reconductoring Project NTP Request #2

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Attachment A: NTP #2 Project Work Locations

Attachment B: MMRCP & permitting requirements table of compliance and status

Attachment C: Map of Modified Staging Area at Redwood Acres Fairground

Attachment D: Shapefile of the Modified Staging Area at Redwood Acres Fairground

Attachment E: Supporting Information for PG&E's response to the CPUC's February 24 comments

**1. Location and Activities Included in NTP 2 Request:**

Work under NTP #2 will include completing work from pole 6 (near Golden West Drive) to pole 115 (at the Humboldt Substation). All proposed work locations associated with NTP #2 are identified in the figures included as Attachment A.

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## 2. Project Schedule

After the CPUC approves NTP #2 request, PG&E will initiate material deliveries to the Fields Landing staging area. Site preparation of other staging areas will begin as early as May 2022, and construction activities will begin in June 2022. All Project work approved under NTP #2 request will be completed by the end of December 2022.

## 3. MMRCP & Permitting Requirements

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. See the attached MMCRP Table (Attachment B), which identifies all MMRCP measures and any applicable regulatory agency conditions along with the status of compliance. Tables 1 and 2 below provide the status of the measures. The Storm Water Pollution and Prevention Plan (SWPPP) is under development and will be submitted when available. It is a condition of the Coastal Development Permit (CDP) to submit the Helicopter Use Plan to the Executive Director of the Coastal Commission for review and approval prior to construction. PG&E received Coastal Commission approval of the Helicopter Use Plan on March 28, 2022.

Table 1: MMRCP Preconstruction Submittals

Measure	Compliance Action/Submittal	Status
APM WQ-1	Submit a SWPPP to the CPUC for record keeping prior to the commencement of construction activities.	Forthcoming. To be submitted prior to commencement of construction activities.
APM WF-3	Submit a Construction Fire Prevention Plan to the CPUC.	Completed 07/27/21 as part of NTP #1. Reattached to updated NTP #2.
CDP Special Condition #2	Provide to the Executive Director copies of all other local, state, and federal permits and authorizations required to perform project-related work, or evidence that no permits are required.	Completed 07/20/21 (the PTC, 401, and 404 have been submitted to CCC).
CDP Special Condition #3	Submit a project-specific Spill Prevention and Response Plan to the Executive Director for review and approval.	Completed. Submitted to Executive Director of the Coastal Commission on 08/10/21 and approved 9/8/21.
CDP Special Condition #4	Submit a project-specific Helicopter Use Plan to the Executive Director for review and approval.	Approved 3/28/22 and attached to this updated NTP #2 Request.

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Measure	Compliance Action/Submittal	Status
NWP 57 Special Condition #4	Notify the Corps in writing of the anticipated start and stop dates of construction, at least 5 days prior to the initiation of construction.	PG&E will copy the CPUC when submitting this notification.
S. 401 Authorization Special Condition #4	The Regional Water Board shall be notified in writing (e-mail is acceptable) at least five working days prior to commencement of ground disturbing activities for each construction season.	PG&E will copy the CPUC when submitting this notification.

Table 2: MMRCR Construction Requirements

Measure	Compliance Action
APM AE-1	Nighttime lighting: in the unlikely event that nighttime construction activities are necessary, will use measures to minimize the visibility of off-site nighttime lighting wherever feasible.
APM AE-2	Construction cleanup: construction debris will be picked up regularly and disturbed land areas will be restored.
APM AE-3	Reduce new source of glare: will use galvanized finish on new steel poles and lattice towers.
APM AE-4	Nighttime lighting at staging areas: will be directional and focused to minimize potential spillover.
APM AQ-1	Fugitive dust measures: will implement listed measures to minimize dust.
MM AQ-1	Supplemental Best Management Practices: will implement listed measures to minimize potential air impacts.
APM BIO-1	Worker Environmental Awareness Training on biological resources: all crews will receive training.
APM BIO-2	General resource protection measures: listed measures will be implemented throughout the Project.
APM BIO-3	Preconstruction surveys: will conduct surveys for special-status species either within the phenological period for plants or within 7 days prior to construction activities for wildlife.
APM BIO-4	Identification and marking of sensitive Biological Resource Areas: will be clearly marked in the field and on project maps.
APM BIO-5	Biological monitor: a qualified biologist will be onsite during ground-disturbing construction activities in sensitive biological resource areas identified in APM BIO-4 unless the area has been protected by barrier fencing.
APM BIO-6	For work scheduled during the nesting season (February 1 through August 31), will conduct nest detection surveys within 7 days prior to the start of construction.

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Measure	Compliance Action
APM BIO-7	Special-status plants: will flag or otherwise mark all special-status plant populations for avoidance as feasible, and implement protection measures for Lyngbe's sedge.
APM BIO-8	Special-status amphibian and reptile impact avoidance: all open holes, pits, and trenches will be protected to avoid entrapment and open excavations will be inspected each morning prior to start of construction activities. Workers will be instructed to check underneath vehicles prior to moving.
APM BIO-9	General protection measures for wetlands and other waters as listed will be implemented.
APM BIO-10	Temporarily impacted wetlands and other waters will be restored following completion of construction.
APM BIO-11	Permanent impacts on wetlands and other waters will be compensated in accordance with Project permits.
APM BIO-12	Helicopter work will not commence until at least two hours after sunrise and will end at least one hour before sunset to avoid the potential to interrupt peak daily feeding cycles for marbled Murrelet.
MM BIO -1	Pre-construction Bat Survey: MM Bio-1 was implemented prior to tree removal that occurred under NTP #1. Should additional tree removal be necessary, the measures as stated in MM BIO-1 will be implemented.
MM BIO-2	Habitat Restoration Plan: will implement the agency-approved habitat restoration plan.
APM CUL-1	Workers Environmental Awareness Training on archeological resources: all crews will receive training.
APM CUL-2	The archaeological deposit at the Spiegelberg Homestead will have exclusion flagging or safety fencing established around the site.
APM CUL-3	CUL-3(a) is superseded by MM CUL-1. Unanticipated discovery protocols for human remains specified in CUL-3(b) will be implemented if human remains are encountered.
APM CUL-4	CUL-4 is superseded by MM CUL-1.
MM CUL-1	This measure supersedes APM CUL-3(a) and CUL-4. If indigenous or historic-era archaeological resources are encountered during proposed Project development or operation, PG&E and/or its contractors shall immediately cease all construction activity within 100 feet of the find, flag off the area for avoidance, and implement the requirements as described in MM CUL-1.
APM GEO-1	Construction in soft and loose soils: appropriate measures will be implemented to avoid, accommodate, replace, or improve such soils.
APM GEO-2	Slopes affected by construction or operations will be evaluated for stability; grading plans will be designed to limit the potential for slope instability and erosion.

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Measure	Compliance Action
APM PALEO-1	Unanticipated discovery protocols: the listed procedures will be implemented if significant paleontological resources are discovered during construction activities.
APM PALEO-2	Workers Environmental Awareness Training on paleontological resources: all crews will receive training.
APM GHG-1	GHG minimization measures will be implemented throughout the project.
APM HAZ-1	Hazardous Substance Control and Emergency Response: implemented throughout construction at all locations.
APM HAZ-2	Hazardous Substance Control and Emergency Response: included in environmental awareness training.
APM HAZ-3	Fire Risk Management: included in environmental awareness training and implemented throughout construction at all locations.
APM WQ-2	Workers Environmental Awareness Training on water quality: all crews will receive training that will address spill response.
APM NOI-3	PG&E will notify sensitive receptors and post signs within 300 feet of areas of helicopter use at least 7 days prior to beginning helicopter activities.
MM NOI-1a	Construction activities within the City of Eureka will be restricted to the daytime hours between 7:00 a.m. and 7:00 p.m., except as allowed pursuant to Mitigation Measure NOI-1b.
MM NOI-1b	In the event construction is required to occur outside the hours specified in Mitigation Measure NOI-1a and within 500 feet of sensitive receptors, PG&E and/or its contractors will implement the specified measures to reduce any potential nighttime noise impacts.
APM NOI-1c	PG&E will provide notice by mail at least 1 week prior to construction activities to all sensitive receptors and residences within 500 feet of construction sites, staging yards, and access roads, and within 1,000 feet of helicopter landing zones and flight paths. PG&E will also post notices in public areas, including recreational use areas.
APM REC-1	Coordination and signage: PG&E will coordinate with Redwood Fields Ballpark, Redwood Acres Fairgrounds, and McKay Community Forest and signage notifying of construction activities will be posted at these recreational facilities at least one week in advance of construction.
APM TT-1	Transportation and encroachment permits from Caltrans and the local jurisdiction will be obtained, as required. PG&E will coordinate with Eureka Transit Service regarding activities that could impact bus routes.
APM TT-2	Air traffic control: will comply with FAA regulations regarding air traffic and coordinate helicopter operations with local airports. A Helicopter Use Plan will be prepared and submitted prior to commencement of construction activities involving helicopter use.

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Measure	Compliance Action
APM TT-3	Coordination of road closures: will coordinate any road or lane closures with applicable emergency service providers and school districts at least 24 hours prior.
APM WF-1	Smoking and Fire Rules: will be implemented during NTP #2 activities.
APM WF-2	Crews will carry Emergency Fire Suppression Equipment.

**4. Modification of Staging Area at Redwood Acres Fairgrounds**

The existing staging area at Redwood Acres Fairgrounds as depicted in the final IS/MND is approximately 0.6 acre along the eastern side of the fairgrounds as shown in red on Attachment C. The landowner requested that the staging area be modified to be along the southern boundary of the fairgrounds as shown in green, and granted PG&E a 2.75-acre temporary construction easement on January 2, 2022. Historical uses of the proposed staging area is a rodeo arena and a go-kart/BMX track. As the modified staging area only partially fell within the area covered by existing surveys, additional cultural and biological surveys were undertaken as described below.

A cultural records search of the modified location was completed, and a pedestrian survey was performed on December 17, 2021. No cultural resources were identified.

A biological survey was conducted on December 17, 2021. The area was surveyed by a botanist/wetland specialist and a wildlife biologist. No habitat for special-status species was found within the proposed staging area. Vegetated areas were composed of nonnative grasses and ruderal forbes, and large piles of green manure were present within the disturbed grasslands. No special status plants were observed, and although the survey occurred outside of the peak growing season, special-status plant species are unlikely to occur due to the long-standing recreational use and high cover by nonnative perennial species.

The site does not support breeding/nesting/roosting components for special-status wildlife species. While it may provide low-quality dispersal habitat for northern red-legged frog in areas with some moist duff or temporary wet areas, the small intermittent ponded areas on the site (like those present at the time of the December survey) are too shallow and temporary in nature to support breeding. The grassy open area could provide low quality foraging habitat for white-tailed kite, northern harrier, American peregrine falcon, Vaux’s swift, olive-sided flycatcher, and Townsend’s big-eared bat.

A potential 0.11-acre isolated wetland was identified within the eastern end of the inner track boundary of the rodeo arena. The low-lying wetland feature was inundated with approximately two inches of surface water during the site visit and some wetland hydrophytic

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species adapted to mesic and/or saturated soil conditions were present. Historical images on Google Earth indicate that, prior to 2019, the rodeo arena was a maintained corral devoid of vegetation. Nonetheless, the isolated wetland will be flagged and avoided during PG&E use of the staging area in compliance with the general protection measures for wetlands specified in APM Bio-9. PG&E will set up a designated refueling area within the Redwood Acres TCE, at least 100 feet from the wetland. PG&E will install flagging so there is a 50’ buffer around the wetland where there will be no earth disturbance. Use of the staging area will also be subject to the preconstruction survey requirements for special status species specified in APM Bio-3 and APM Bio-7.

**5. Response to the CPUC’s February 24, 2022 comments on PG&E’s February 2, 2022 Submission of NTP #2 Request**

Table 3: PG&E responses to the CPUC comments.

CPUC Comments (February 24, 2022)	PG&E Response
1. CDP Special Condition #2: Provide local permits to the Coastal Commission and CPUC.	The only local permits are the encroachment permits. This will be covered under comment #10.
2. CDP Special Condition #3: Provide Coastal Commission approval verification and a copy of the Spill Prevention and Response Plan.	PG&E submitted a revised Spill Prevention and Response Plan on August 10, 2021 and the CCC approved it on September 8, 2021. (see Attachment E)
3. CDP Special Condition #4: Provide a copy of the Helicopter Use Plan and Coastal Commission approval.	PG&E submitted the Helicopter Use Plan on March 22, 2022 and the CCC approved it on March 28, 2022. (see Attachment E)
4. Table 2: Clarify that these measures are paraphrased and that the measures, as identified in the MMCRP, will be complied with.	The measures in the table are paraphrased, and PG&E will comply with the measures as written in the MMCRP.
5. Section 4, first paragraph (page 6): clarify how much of the 2.75-acre temporary construction easement would be used by PG&E.	The 2.75 acre TCE would be available for use by PG&E, with the exception of a 0.11 acre wetland inside the TCE. BMPs would be installed to exclude use of the wetland. Shapefiles of the TCE and the wetland are provided with this updated NTP #2 Request.
6. Section 4, page 7, first paragraph: Identify the 0.11-acre isolated wetland on the Attachment C.	Please see the shapefile attached to this updated NTP #2 Request. (Attachment D)



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<p>7. Section 4, Describe the site preparation activities that would be required for the staging area at Redwood Acres Fairground.</p>	<p>If the area is rutted from the landowner's prior use, equipment will be used to smooth the surface. Fencing will be installed around the TCE to exclude the public from the area.</p>
<p>8. MMCRP Status Table, MM BIO-2: Provide a copy of the Habitat Restoration Plan.</p>	<p>The October 21, 2020 Habitat Restoration Plan is attached to this updated NTP #2 Request. (see Attachment E)</p>
<p>9. MMCRP Status Table, APM WQ-1: Provide a copy of the Stormwater Pollution Prevention Plan.</p>	<p>The SWPPP development is in progress and will be submitted prior to construction.</p>
<p>10. MMCRP Status Table, APM TT-1: Provide copies of Caltrans and local encroachment permits as they become available.</p>	<p>PG&amp;E is not proposing to complete work at the Highway 101 under NTP #2, so the Caltrans encroachment permit will not be obtained until after 2022.</p> <p>Local encroachment permits will be provided as they become available.</p>
<p>11. MMCRP Status Table, APM WF-3: Provide a copy of the Construction Fire Prevention Plan.</p>	<p>The June 2021 Construction Fire Plan is attached to this updated NTP #2 Request. (see Attachment E)</p>

**6. Pole 65: Minor increase in structure height**

PG&E is requesting confirmation that a taller engineered direct embedded pole (EDEP) pole may be installed under NTP #2. The existing pole 65 is a wood pole approximately 52' tall and was planned to be replaced with a EDEP 54' tall, with a SCADA switch installed on the replacement pole (Public Draft IS/MND p. 2-16, February 2020). Final engineering has identified a replacement EDEP pole up to 15' taller than identified in the IS/MND.

The taller EDEP pole would not be a particularly tall pole; it would be within the height ranges identified: 47'-90' tall wood poles, 67'-77' tall TSPs, 43'-83' LDSPs (Public Draft IS/MND p. 2-11, February 2020).

Pole 65 is set back from Campton Road and pole 64 is closer to Campton Road and in the foreground of any views from Campton Road. The replacement pole 64 would still be over 10' taller than the proposed taller pole 65.

PG&E has also observed surface cracking indicating soil creep on the hillslope adjacent to the existing pole 65. PG&E plans to install the replacement pole west of the existing pole 65 to move

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away from the unstable soil. It will be closer to an adjacent residence, but still within the approximately 70' x 40' work area approved in the PTC. It may be moved up to 45' west of the current pole location and remain in the existing approved area. No vegetation removal is planned at this location.

**7. Response to the CPUC’s May 20, 2022 comments on PG&E’s May 10, 2022 Re-submission of NTP #2 Request**

Table 4: PG&E responses to the May 10, 2022 CPUC comments.

CPUC Comments (May 10, 2022)	PG&E Response
<p>The NTP includes a request to move pole 65 west of the current location, but it does not say how far (feet) away it would be moved. Please clarify how far west of the existing/approved pole site would the new pole be placed.</p>	<p>Clarification was added to Section 6.</p>
<p>NTP 1 did not include a vegetation removal work area associated with pole 65, indicating vegetation removal was not needed for that site. Please confirm that vegetation removal would still not be required for the proposed new pole site west of the existing site.</p>	<p>Clarification was added to Section 6.</p>
<p>For consistency with the MMRCP and to maintain clarity in the field, please remove APMs NOI-1 and NOI-2 from MMRCP Construction Requirements Table 2. Those APMs were superseded by MND Mitigation Measures NOI-1a and NOI-1b, respectively.</p>	<p>NOI-1 and NOI-2 were deleted from Table 2.</p>
<p>The Biological Resources Technical Report (BRTR) prepared for the Project identifies 12 “special status natural communities” of plants and identifies lots of potential habitat for sensitive animals. APM BIO-3 requires surveys in areas identified in the BRTR as “having habitat for sensitive species and sensitive biological resource areas.” APM BIO-4 requires sensitive areas to be marked in the field and on the plans, and APM BIO-5 requires that these areas be monitored. It would be helpful if the NPT #2 request could generally describe which sensitive areas</p>	<p>In accordance with APM BIO-3, PG&amp;E will conduct preconstruction surveys for special-status wildlife and rare plants in areas of suitable habitat within the project area. Results of preconstruction surveys will be mapped and provided to the CPUC. A biological monitor will be present for all work within mapped special-status species habitat and will mark the following habitat types within and adjacent to work areas prior to the onset of construction:</p>

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identified in the BRTR will be marked, surveyed, and/or monitored.	<ul style="list-style-type: none"><li>• Jurisdictional wetlands and waters of the U.S.</li><li>• California Coastal Act wetlands</li><li>• populations of Lyngbye’s sedge</li><li>• Sensitive natural communities (ranked S1-S3)</li><li>• Special status species habitat (if not already captured in the above habitat types)</li></ul>
Does PG&E plan to implement the earth disturbance and refueling setbacks identified in APM BIO-9 at the revised staging area?	Yes. Details have been added to Section 4.

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

Sincerely,

Erin Rice  
Senior Land Planner

cc: Matt Fagundes, Environmental Science Associates  
Even Holmboe, Environmental Science Associates  
Jo Lynn Lambert, Attorney at Law  
Scott Oppelt, Stantec  
Iris Koski, Stantec

Attachments: A – NTP #2 Project Work Locations  
B - MMCRP and Permit Tracking Table (NTP #2)  
C – Map of Modified Staging Area at Redwood Acres Fairground  
D – Shapefile of the Modified Staging Area at Redwood Acres Fairground  
E – Supporting Information for PG&E’s response to the CPUC’s February 24 comments