

PUBLIC UTILITIES COMMISSION

300 CAPITAL MALL, 5TH FLOOR
SACRAMENTO, CA 95814



August 11, 2021

Erin Rice
Senior Land Planner
PG&E
2730 Gateway Oaks Drive
Rm 220, #235B
Sacramento, CA 95833

RE: Notice to Proceed Request No. 1 for the Humboldt Bay-Humboldt #1 60kV Reconductoring Project (A.19-02-004) – Vegetation Management

Dear Mr. Rice:

On November 23, 2020 the California Public Utilities Commission (CPUC) adopted the Final Initial Study and Mitigated Negative Declaration (IS/MND) for the Humboldt Bay-Humboldt #1 60kV Reconductoring Project (Project) and approved the Project (Application 19-02-004). The decision grants Pacific Gas and Electric Company (PG&E) a Permit to Construct and approves the Project conditionally with the implementation of Applicant Proposed Measures and Mitigation Measures adopted in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP).

On March July 26, 2021, PG&E submitted a Notice to Proceed Request (NTPR-1) to the CPUC seeking the authority to proceed with vegetation removal activities in advance of construction of the Project. Specifically, PG&E proposes to remove trees and brush using chain saws and mowers outside of the 2021 nesting season (February – August) for birds to reduce the risk of birds nesting in the construction sites next year. Maps showing proposed work locations are provided in **Appendix A**. PG&E would commence the vegetation management work on or after September 1, 2021 and the work would take approximately 6 weeks to complete. Any vegetation management work within wetland areas would be completed prior to October 15, 2021.

As part of NTPR-1, PG&E is also requesting a minor expansion of the work areas at TSP 1a and pole 77, and overland access along the right-of-way between poles 57 and 58. The proposed change at pole 77 also would include installation of a new stub pole in response to a landowner request, which would be included as part of the second NTP request anticipated in Spring 2022.

This letter documents the CPUC's thorough evaluation of all activities covered in NTPR-1. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the Notice to Proceed are implemented as required in the CPUC's Decision. A brief description of the proposed modifications is provided below.

Expansion of Workspace at TSP 1a

During final engineering and design, PG&E identified that TSP 1a needs to shift southward by approximately 7 feet and that there is insufficient workspace on the south and east sides to install the TSP. The expanded

workspace is depicted on Sheet 1 of Appendix A, and is approximately 875 square feet (0.02 acre) of which approximately 200 square feet is within a 1-parameter wetland. The expanded work area is within the existing survey area for biological and cultural resources and abuts the eastern boundary of the pull site by Humboldt Bay Substation (pull sites are not shown on the NTPR-1 workspace figure). A willow thicket with stems up to 12-inch diameter at breast height (DBH) is present within the expanded work area and would be removed as part of vegetation removal activities in NTP-1. Expansion of the workspace would not result in impacts beyond those identified in the Final Initial Study/Mitigated Negative Declaration.

Expansion of Workspace at Pole 77

At pole 77 (shown on Sheet 7 of Appendix A) the landowner has requested that the guy wire for the pole be moved as it prevents access to part of his property. PG&E proposed to the landowner that the guy wire can be removed and replaced with a stub pole as part of the reconductoring project at no cost to the landowner. The stub pole would be located directly south of pole 77, within the existing survey area for cultural and biological resources. Expansion of this workspace to install the stub pole would require removal of a clump of five redwood stems, measuring 21, 27, 27, 32, and 41 inches DBH. Expansion of the workspace and stub pole installation would not result in impacts beyond those identified in the Final Initial Study/Mitigated Negative Declaration.

Overland Access Between Poles 57 and 58

Poles 57 and 58 are located immediately west of the intersection of Oak Street and D Street (shown on Sheet 6 of Appendix A). Pole 58 is adjacent to and accessible from a paved driveway that serves three homes. Pole 57 is 275 feet west of pole 58. Access to pole 57 is identified as being by helicopter; however, PG&E has requested overland access to the pole along the existing right-of-way. As such, PG&E requests approval of overland access between the two poles and to clear (masticate) vegetation. The right-of-way between poles 57 and 58 is within the existing survey area for biological and cultural resources and would not result in impacts beyond those identified in the Final Initial Study/Mitigated Negative Declaration.

The table below identifies all Applicant Proposed Measures (APMs), Mitigation Measures (MMs), and any applicable regulatory agency conditions described in the MMCRP along with the status of compliance for actions proposed under NTPR-1:

Applicant Proposed Measure / Mitigation Measure	Compliance Action / Status
APM AQ-1: Minimize Fugitive Dust	PG&E will implement during NTP-1 activities, specifically limiting vehicle speeds on unpaved surfaces.
MM AQ-1: Supplemental Best Management Practices	PG&E will limit idling time, maintain and properly tune equipment, and remove track-out on public roads.
APM BIO-1: Development and implementation of a Worker Environmental Awareness Program	PG&E will present a worker training specific to vegetation management activities.
APM BIO-2: General Resource Protection Measures	PG&E will implement during NTP-1 activities.

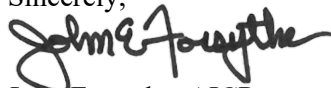
Applicant Proposed Measure / Mitigation Measure	Compliance Action / Status
APM BIO-3: Conduct Preconstruction Survey(s) for Special-Status Species and Sensitive Biological Resource Areas	A qualified biologist will conduct surveys in areas identified in the BRTR as having habitat for special-status species and sensitive biological resource areas within 7 days of vegetation management activities.
APM BIO-4: Identification and Marking of Sensitive Biological Resource Areas	Sensitive biological resources identified during pre-construction surveys will be clearly marked in the field and on project maps.
APM BIO-5: Biological Monitor On-Site during Construction Activities in Sensitive Biological Resource Areas	A qualified biologist will monitor vegetation removal in wetland areas.
APM BIO-7: Special-Status Plants	Vegetation removal activities are not scheduled to occur at the locations where Lyngbye's sedge was previously identified. If Lyngbye's sedge is subsequently identified, PG&E will limit driving across it during vegetation management activities.
APM BIO-8: Special-Status Amphibian and Reptile Impact Avoidance and Protection	NTP-1 activities are not scheduled for the rainy season and no excavation work will occur. Workers will be instructed to check underneath vehicles for amphibians and reptiles prior to moving.
APM BIO-9: Implement General Protection Measures for Wetlands and Other Waters	PG&E will implement during NTP-1 activities.
MM BIO-1: Pre-construction Bat Survey	PG&E will perform the bat survey prior to commencement of tree removal, and adhere to the mitigation measure requirements should potential roosting habitat or active bat roosts be found in trees to be removed.
APM CUL-1: Workers Environmental Awareness Training	PG&E will present a worker training specific to vegetation management activities.
APM PALEO-2: Worker's Environmental Awareness Training	PG&E will present a worker training specific to vegetation management activities.
APM GHG-1: Minimize GHG Emissions	PG&E will implement during NTP-1 activities.
APM HAZ-1: Hazardous-Substance Control and Emergency Response	PG&E will implement during NTP-1 activities.
APM HAZ-2: Worker Environmental Awareness Program (WEAP) for Health, Safety, and Environment	PG&E will present a worker training specific to vegetation management activities.
APM HAZ-3: Fire Risk Management	PG&E will implement during NTP-1 activities.
APM WQ-2: Worker Environmental Awareness Training (WEAP) Development and Implementation	PG&E will present a worker training specific to vegetation management activities.
APM NOI-1: Employ Noise-Reducing Construction Practices during Temporary Construction Activities.	PG&E will implement during NTP-1 activities.

Applicant Proposed Measure / Mitigation Measure	Compliance Action / Status
MM NOI-1a: Adherence to City of Eureka Construction Hour Restrictions	Construction activities within the City of Eureka shall be restricted to the daytime hours between 7:00 a.m. and 7:00 p.m.
APM REC-1: Coordination and Signage	PG&E will implement during NTP-1 activities.
APM TT-1: Temporary Traffic Controls	An encroachment permit will be obtained should one be needed to complete vegetation removal as determined by the vegetation crew prior to commencement of work.
APM WF-1: Smoking and Fire Rules	PG&E will implement during NTP-1 activities.
APM WF-2: Carry Emergency Fire Suppression Equipment	PG&E will implement during NTP-1 activities.
APM WF-3: Construction Fire Prevention Plan	Construction Fire Prevention Plan provided to CPUC and determined to be complete.

PG&E is authorized to proceed with the proposed construction activities associated with NTPR-1 provided that all proposed actions and construction is carried out in accordance with the methods and conditions described in NTPR-1, and subject to completion of the following implementing actions by PG&E prior to the start of construction:

- PG&E will implement the MMCRP to ensure implementation of all APMs, applicable Project Mitigation Measures, compliance plans, and permit conditions during construction activities. Some measures are on-going and/or have time-sensitive requirements and shall be implemented prior to and during construction as applicable. A copy of the MMCRP, other permits, and the NTP will be kept at the construction site.
- Although Mitigation Measure BIO-2: Habitat Restoration Plan is not included or required for approval of NTPR-1, this measure requires pre-construction surveys to characterize existing vegetation within disturbed sensitive natural communities. Therefore, the CPUC recommends that such areas affected by vegetation management under NTPR-1 be accounted for in order to fulfill the requirements of this measure.
- PG&E will provide documentation of pre-construction species surveys and identification of sensitive biological resource areas, as identified in the table above, prior to construction.
- Prior to conducting vegetation management activities, PG&E will conduct a Worker Environmental Awareness Program (WEAP) for all Project personnel. PG&E will maintain training logs at the construction site and they will be made available upon request.

Sincerely,



John Forsythe, AICP
CPUC Environmental Project Manager

cc: Mike Manka, ESA
Cory Barringhaus, ESA