



June 3, 2022

Erin Rice  
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PG&E  
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*Re: Notice to Proceed No. 2 for the Humboldt Bay-Humboldt #1 60 kV Reconductoring Project (A.19-02-004) – 2022 Construction Scope*

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 60 kV Reconductoring Project (Project) and approved the Project (Application 19-02-004). The decision granted Pacific Gas and Electric Company (PG&E) a Permit to Construct and approved the Project conditionally with the implementation of Applicant Proposed Measures and Mitigation Measures adopted in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). On August 11, 2021, the CPUC granted PG&E Notice to Proceed No. 1, which authorized PG&E to conduct vegetation removal activities in advance of construction of the Project.

On May 10, 2022, PG&E submitted Notice to Proceed Request 2 (NTPR-2) to the CPUC seeking the authority to begin construction of the Project and proceed with completing work from pole 6 (near Golden West Drive) to pole 115 (at Humboldt Substation). Maps showing proposed work locations associated with NTPR-2 are provided in NTPR-2 **Appendix A**. Upon receipt of this approval, PG&E will initiate material deliveries to the Fields Landing staging area and site preparation of other staging areas will begin, and construction activities will begin in June 2022. All Project work approved under NTPR-2 will be completed by the end of December 2022. As part of NTPR-2, PG&E is also requesting modifications to the staging area at Redwood Acres Fairgrounds and to allow for a taller and slightly moved engineered direct embedded pole (EDEP).

This letter documents the CPUC's thorough evaluation of all activities covered in NTPR-2. 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. Brief descriptions of proposed minor modifications to the Project are provided below.

### **Modified Staging Area at Redwood Acres Fairground**

The originally approved staging area at Redwood Acres Fairground as depicted in the Final IS/MND is approximately 0.6 acre along the eastern side of the fairgrounds. The landowner has since requested that the staging area be modified to be along the southern boundary of the fairgrounds and granted PG&E a 2.75-acre temporary



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construction easement for a new proposed staging area as shown in NTPR-2 **Appendix C**. The 2.75-acre temporary construction easement will replace the originally approved 0.6-acre staging area for the Project. The temporary construction easement will be available for use by PG&E as a staging area except for a 0.11-acre wetland and an associated 50-foot buffer around the wetland at the center of the site (see NTPR-2 Appendix C). The isolated wetland and the 50-foot buffer around the wetland will be flagged to avoid use of the wetland area during PG&E use of the staging area in compliance with the general protection measures for wetlands specified in APM BIO-9, and 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. If the temporary construction easement site is rutted from the landowner's prior use, equipment will be used to smooth the surface. Fencing will be installed around the temporary construction easement to exclude the public from the area.

The modified staging area has been used as a rodeo arena and a go-kart/BMX track. Part of the modified staging area is not within the area covered by previous surveys conducted for the Project; therefore, additional cultural and biological resources surveys were undertaken as described in the NTPR-2. No cultural resources or habitat for special-status species were found within the proposed staging area. As defined in the MMCRP prepared for the Project, a variance to the Project, such as the proposed modified staging area, should be strictly limited to minor Project changes that will not trigger other permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. Since the proposed modified staging area at Redwood Acres Fairground meets this definition, the requested modifications to the Project are approved.

### **Height Increase and Location Change for Pole 65**

A taller engineered direct embedded pole (EDEP) is requested to be installed under NTPR-2. The existing pole 65 is a wood pole approximately 52 feet tall and was planned to be replaced with a EDEP 54 feet tall, with a SCADA switch installed on the replacement pole (IS/MND p. 2-16). PG&E has stated that final engineering has identified the need for the replacement EDEP to be up to 15 feet taller than originally approved as identified in the IS/MND.

The taller EDEP pole would be within the pole height ranges identified in the IS/MND (i.e., 47 to 90 feet tall for wood poles, 43 to 83 feet tall for light-duty steel poles, and 67 to 77 feet tall for tubular steel poles (IS/MND Table 2-2, p. 2-11)). 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 be over 10 feet taller than pole 65.

PG&E has also observed surface cracking indicating soil creep on the hillslope adjacent to existing pole 65. PG&E is requesting to install the replacement pole up to 45 feet west of existing pole 65 to move away from the unstable soil. It will be closer to an adjacent residence, but still within the previously approved work area. No vegetation removal would be required in the vicinity of the replacement pole site. The proposed changes associated with pole 65 are minor Project changes that will not trigger other permit requirements, will not increase the severity of an impact, or create a new impact, and would clearly and strictly comply with the intent of the IS/MND mitigation measures. Therefore, the requested modifications to the Project are approved.



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## MMCRP Measures and Conditions

The table below identifies all Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) described in the MMCRP along with the status of compliance for actions proposed under NTPR-2:

| Applicant Proposed Measure / Mitigation Measure / Other Agency Conditions                                       | Compliance Action / Status  |
|---|---|
| APM AE-1: Nighttime lighting to minimize potential visual impacts of construction activity                      | PG&E and its contractors will implement as defined during any nighttime activities.   |
| APM AE-2: Construction Cleanup  | PG&E and its contractors will implement as defined, including conducting debris removal during construction activities and will restore the sites following construction.   |
| APM AE-3: Use of Galvanized Finish on LDSs, TSPs, and LSTs  | PG&E and its contractors will use galvanized finish on new steel poles and lattice towers.  |
| APM AE-4: Design and operation of staging areas to minimize potential visual impacts                            | PG&E and its contractors to implement as defined, including the use of directional and focused lighting to minimize potential spillover.  |
| APM AQ-1: Minimize Fugitive Dust  | PG&E and its contractors will implement as defined during activities authorized under NTP-2.  |
| MM AQ-1: Supplemental Best Management Practices   | PG&E and its contractors will implement as defined during activities authorized under NTP-2.  |
| APM BIO-1: Development and implementation of a Worker Environmental Awareness Program                           | PG&E and its contractors will implement as defined and will conduct worker training specific to construction activities authorized under NTP-2.   |
| APM BIO-2: General Resource Protection Measures   | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.   |
| APM BIO-3: Conduct Preconstruction Survey(s) for Special-Status Species and Sensitive Biological Resource Areas | PG&E and its contractors will implement as defined. A qualified biologist will conduct surveys in areas identified in the Biological Resources Technical Report prepared for the Project as having habitat for special-status species and sensitive biological resource areas within 7 days of construction activities. |
| APM BIO-4: Identification and Marking of Sensitive Biological Resource Areas                                    | PG&E and its contractors will implement as defined. Sensitive biological resources identified during pre-construction surveys will be clearly marked in the field and on project maps.  |



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| Applicant Proposed Measure / Mitigation Measure / Other Agency Conditions                                   | Compliance Action / Status   |
|---|--|
| APM BIO-5: Biological Monitor On-Site during Construction Activities in Sensitive Biological Resource Areas | PG&E and its contractors will implement as defined. A qualified biologist will monitor construction activities in wetland areas.   |
| APM BIO-6: Nesting Bird Impact Avoidance and Protection.  | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2. Nest detection surveys for work scheduled during the nesting season (February 1 through August 31) will be conducted within 7 days prior to the start of construction.   |
| APM BIO-7: Special-Status Plants  | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2. Special-status plant populations will be flagged or otherwise marked for avoidance and protection measures for Lyngbe's sedge will be implemented.   |
| APM BIO-8: Special-Status Amphibian and Reptile Impact Avoidance and Protection                             | PG&E and its contractors will implement the required surveys prior to the start of construction activities authorized under NTP-2. All open holes, pits, and trenches will be protected, and open excavations will be inspected each morning prior to start of construction activities. 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 and its contractors will implement during activities authorized under NTP-2, including those at the modified staging area at Redwood Acres Fairground.  |
| APM BIO-10: Restore Temporarily Impacted Wetlands and Other Waters  | PG&E and its contractors will implement as defined during construction activities.   |
| APM BIO-11: Compensate for Permanent Impacts on Wetlands and Other Waters                                   | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.  |
| APM BIO-12: Minimize Impact to Marbled Murrelet   | PG&E will implement as defined during construction activities authorized under NTP-2. 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   | This measure was implemented prior to tree removal that occurred during activities authorized by NTP-1. If additional tree removal is determined to be necessary, the measure will be implemented as defined.  |



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| Applicant Proposed Measure / Mitigation Measure / Other Agency Conditions                    | Compliance Action / Status   |
|--|--|
| MM BIO-2: Habitat Restoration Plan   | PG&E and its contractors will implement the 2020 Habitat Restoration Plan as defined during construction activities authorized under NTP-2.  |
| APM CUL-1: Workers Environmental Awareness Training  | PG&E and its contractors will conduct worker training specific to construction activities authorized under NTP-2.  |
| APM CUL-2: Flag and Avoid Resources (Spiegelberg Homestead Archaeological Deposit)           | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.  |
| APM CUL-3b): Manage Unanticipated Human Remains Discoveries                                  | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2 if human remains are encountered.   |
| Mitigation Measure CUL-1: Archaeological Resources Avoidance                                 | If indigenous or historic-era archaeological resources are encountered during Project construction 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 as defined during construction activities authorized under NTP-2. |
| APM GEO-1: Minimization of Construction in Soft or Loose Soils                               | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.  |
| APM GEO-2: Reduction of Slope Instability during Construction                                | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2. Grading plans will be designed to limit the potential for slope instability and minimize the potential for erosion.  |
| APM PALEO-1: Unanticipated Potential Paleontological Resource                                | If significant paleontological resources are discovered, PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.   |
| APM PALEO-2: Worker's Environmental Awareness Training                                       | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2. Worker training shall take place prior to and during construction for new staff.   |
| APM GHG-1: Minimize Greenhouse Gas Emissions   | PG&E and its contractors will implement GHG minimization measures as defined during construction activities authorized under NTP-2.  |
| APM HAZ-1: Hazardous-Substance Control and Emergency Response                                | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.  |
| APM HAZ-2: Worker Environmental Awareness Program (WEAP) for Health, Safety, and Environment | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2. Worker training shall take place prior to and during construction for new staff.   |



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| Applicant Proposed Measure / Mitigation Measure / Other Agency Conditions                      | Compliance Action / Status   |
|--|--|
| APM HAZ-3: Fire Risk Management  | PG&E and its contractors will implement fire risk management procedures as defined during construction activities authorized under NTP-2.  |
| APM WQ-1: Development and Implementation of a SWPPP  | PG&E and its contractors to submit the SWPPP to the CPUC prior to the commencement of construction activities.   |
| APM WQ-2: Worker Environmental Awareness Training (WEAP) Development and Implementation        | PG&E and its contractors will present a worker training specific to vegetation management activities.  |
| APM NOI-3: Notify Sensitive Receptors of Helicopter Use  | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2. Sensitive receptors will be notified of helicopter use at least 7 days prior to helicopter activities. |
| 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.   |
| MM NOI-1b: Nighttime Construction.   | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.  |
| MM NOI-1c: Construction Noise Management   | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.  |
| APM REC-1: Coordination and Signage  | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2. Signage to be posted at least one week prior to commencement of construction at a given location.      |
| APM TT-1: Temporary Traffic Controls   | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2. All required encroachment permits will be obtained prior to commencement of work.                      |
| APM TT-2: Air Traffic Control  | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.  |
| APM TT-3: Coordination for Road Closures with Emergency Service Providers and School Districts | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2. Coordination will occur at least 24 hours prior to implementing any road or lane closures.             |
| APM WF-1: Smoking and Fire Rules   | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.  |
| APM WF-2: Carry Emergency Fire Suppression Equipment   | PG&E and its contractors will implement as defined during construction activities authorized under NTP-2.  |



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| Applicant Proposed Measure / Mitigation Measure / Other Agency Conditions | Compliance Action / Status  |
|---|---|
| APM WF-3: Construction Fire Prevention Plan                               | PG&E and its contractors will implement the CPUC-approved Construction Fire Prevention Plan as defined during construction activities authorized under NTP-2. |

PG&E is authorized to proceed with the proposed construction activities associated with NTPR-2 provided that all proposed actions and construction is carried out in accordance with the methods and conditions described in NTPR-2, 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 this NTP will be kept at the construction site(s).
- Prior to conducting each survey required by APM BIO-3, PG&E will notify the CPUC of when and where (as identified in the Biological Resources Technical Report prepared for the Project) the surveys will be conducted.
- 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 construction activities under NTP-2, PG&E will conduct a Worker Environmental Awareness Program (WEAP) training for all Project personnel. PG&E will maintain training logs at the construction site(s) and will make them available upon request.
- PG&E will submit the Storm Water Pollution Prevention Plan (SWPPP) prior to the commencement of construction activities.
- PG&E will provide local encroachment permits to CPUC as they are obtained.
- PG&E will notify sensitive receptors of helicopter use at least 7 days prior to planned helicopter activities.

Sincerely,

John E. Forsythe, AICP  
CPUC Environmental Project Manager

cc: Mike Manka, ESA  
Matt Fagundes, ESA