

June 21, 2015

**RE: Liberty Utilities 650 Line Upgrade – Partial Notice to Proceed (NTP) Request
Martis Tap Pole to Brockway Summit – Weed and Manual Chemical Application Pre-Treatment**

Greetings Mr. Rosauer,

Liberty Utilities recently completed permitting under NEPA, CEQA and TRPA jurisdiction for EIS/EIS/EIR level review of the 625/650 Upgrade Project. That review included Liberty Utilities North Lake 60kV Transmission System consisting of proposed upgrades to the 625 and 650 lines, as well as supporting substations to allow for ultimate upgrade to 120kV. As presented in the review and permitting process, this upgrade will occur over a period of time through a phased installation. For the upcoming 2015 summer construction window, Liberty Utilities will be rebuilding the 650 line between the Martis Tap and the Northstar Substation. Additionally, the substation civil work will be completed and the vegetation management will be completed between Martis Tap and the Brockway Summit.

In compliance with the Liberty Utilities 625 650 Mitigation Monitoring Compliance and Reporting Program (MMCRP), please accept this document as Liberty Utilities request for Partial Notice to Proceed with chemical and manual pre-treatment for noxious weeds. For reference, a primary Partial Notice to Proceed is also being submitted concurrently, under separate letter, for full vegetation management and construction of the 650 Line between Martis and Brockway Summit. The following information provides the details scope of work as required under the MMCRP for the weed pre-treatment.

ACTION REQUESTED FOR THIS PARTIAL NTP

Liberty Utilities is respectfully requesting Partial Notice to Proceed for the noxious weed pre-treatment on the 650 Project from the Martis riser pole to the Brockway Summit. We request this NTP on or before July 5, 2015.

PERMITTING REQUIRED

The following permits are required prior to the issuance of this specific Partial NTP. Status has been provided for reference:

- Environmental Impact Statement/Environmental Impact Statement/Environmental Impact Report *(Completed)*
- California Public Utilities Commission Permit to Construct *(Complete)*

These permits are attached in the File Share FTP set up for this project as detailed in the 650 Line Upgrade Construction and Veg Management PNTTP request.

APPLICATION AND AREA OF WEED PRE-TREATMENT

Invasive plant infestations will be treated either by manual or chemical means. If herbicides are to be used, they will be mixed as recommended by the PCA. Equipment used in conjunction with chemical applications will include hand sprayers, backpack sprayers, or large 60 gallon spray tank with electric pump (where application can be completed from a roadway). Equipment used in conjunction with manual treatments will include shovels or hand tools.

Equipment type will be determined by infestation size and accessibility as well as consideration for avoidance of non-target species. All chemical treatment shall be spot-treatment unless infestations are located in standing water, whereby hand removal with a shovel or other hand tool shall occur. All plants removed by hand shall be put in plastic trash bags, sealed, and properly disposed. Spray nozzles shall be adjusted so that spray does not contact non-target plants to the extent feasible. Spraying shall not occur when winds could cause significant herbicide drift.

The area of chemical application has been targeted to address the noxious weeds that will best respond to this chemical pre-treatment. No USFS, Army Corps of Engineers, Tahoe Truckee Airport District, or TRPA land will be involved in chemical pre-treatment. On these lands, manual pre-treatment will be completed. Under this NTP, the area for manual and chemical pre-treatment will focus from the Martis Tap to the Brockway Summit.

CPUC NTP SUBMITTALS

Specific to this Partial NTP, in compliance with the permitting requirements, the following Applicant Proposed Measures (APMs) apply to noxious weed pre-treatment and management.

BIO-2	CalPeco will conduct a complete floristic survey, including surveys for all special-status botanical species and invasive plants, during a time that coincides with the greatest number of blooming periods for target species. This survey will be conducted no more than one year prior to the start of construction. Occurrences of special-status botanical species and weed-infested areas will be flagged or fenced no more than 30 days prior to the start of
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	construction. Flagging and fencing will be refreshed and maintained throughout construction. Implementation of this measure will occur in coordination with USFS
BIO-3	CalPeco will complete an invasive plant risk assessment for all ground-disturbing activities.
BIO-4	Before construction activities begin, CalPeco will treat invasive plant infestations where feasible. Treatments will be selected based on each species ecology and phenology. All treatment methods—including the use of herbicides—will be conducted in accordance with the law, regulations, and policies governing the land owner (e.g., TRPA in the Lake Tahoe Basin; LTBMU Forest Supervisor and Tahoe National Forest Supervisor on NFS lands). Land owners will be notified prior to the use of herbicides. In areas where treatment is not feasible, CalPeco will clearly flag or fence infested areas in order to clearly delineate work exclusion. Appropriate treatments will also be incorporated into tree removal and construction activities, such as a requirement that all cut live conifer stumps greater than 6 inches in diameter be treated with Sporax or an EPA-registered borate compound to prevent the spread of Annosus root disease.

Studies in compliance with APMs Bio-2 and Bio-3 have been completed and uploaded to the File Share FTP site. In support of BIO-4, Liberty Utilities has prepared the attached Noxious Weed Management Plan. Appended to this plan is the Invasive Plant Treatment Implementation Plan that has been developed specifically for the area between Martis Tap and the Brockway Summit, to be applied prior to construction in spring/summer 2015. This treatment plan has been prepared in compliance of BIO-4 as referenced above. The plan is attached as Appendix A, B and C.

LAND OWNER NOTIFICATION

The following land owners have been notified of weed pre-treatment practices.

- Trimont Land Company (Northstar) – Approved to Proceed from Land Owner
- Sierra Pacific Industries – Approved to Proceed from Land Owner
- Truckee Donner Land Trust – Approved to Proceed from Land Owner
- Truckee Tahoe Airport District – Notified. If no response, will proceed with manual removal
- CalTrans – District 3 – Notification meets agency requirement. Approved to Proceed

Each of the above land owners have been notified of this weed pre-treatment application. Notifications are attached for reference as Appendix D.

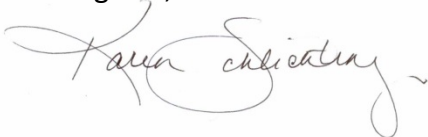
SCHEDULE

For reference, the following project schedule milestones have been developed and are included for overall project reference.

Description	Date*	Comments
Submittal of Partial NTP Request to CPUC for 650 line and veg management work between Martis and Northstar	June 20, 2015	Partial NTP for the 650 line upgrade project.
Submittal of Partial NTP Request to CPUC for Pre-Construction Weed Management	June 20, 2015	Partial NTP will be requested to allow for chemical application and manual removal of weeds as a pre-construction treatment.
Receive Partial NTP for pre-construction weed treatment	July 5, 2015	
Complete Application of Weed Pre-Treatment	July 6 – 30, 2015	
All Partial NTP submittals for construction and vegetation management complete and submitted to CPUC	July 15, 2015	
CPUC Partial NTP Received for the 650 Line between Martis Tap and Brockway Summit	On or Before August 1, 2015	
650 Line Outage Begins – Construction Starts	August 4, 2015	During the outage beginning on August 4, 2015 at 7:00a.m, the 650 line between Martis Valley and Northstar will be de-energized.
Construction Complete / 650 line and distribution underbuild Re-Energized	October 18, 2015	All lines will be re-energized on October 18, 2015 at 5:00p.m. at the latest, or earlier if possible.
Site secured with BMP requirements and all equipment removed (contractor de-mobilized)	October 30, 2015	All ground disturbances must be completed no later than October 15, 2015 unless a waiver is obtained from Lahontan Regional Water Quality Control by the contractor.

Please let me know if you have any questions.

Best Regards,



Karen Schlichting, PE

**APPENDIX A, B and C
NOXIOUS WEED MANAGEMENT PLAN
&
INVASIVE PLANT TREATMENT IMPLEMENTATION PLAN FOR SPRING
SUMMER 2015**

APPENDIX D
LAND OWNER NOTIFICATION