

April 14, 2017

Andrew Barnsdale Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Monthly Report Summary #35 for Aliso Canyon Turbine Replacement Project

Dear Mr. Barnsdale:

This monthly report provides a summary of the compliance monitoring activities that occurred during the period from **February 1 to 28, 2017**, for the Aliso Canyon Turbine Replacement (ACTR) Project (Aliso) in California. Compliance monitoring was performed to ensure that all project-related activities conducted by Southern California Gas Company (SCG), Southern California Edison (SCE), and their contractors are in compliance with the requirements of the Final Environmental Impact Report (Final EIR) for Aliso, as adopted by the California Public Utilities Commission (CPUC) on November 14, 2013, and as further modified in the Addendum to the Final EIR, as approved by the CPUC on December 18, 2014.

The CPUC has issued the following Notices to Proceed (NTPs) for the project to SCG and SCE:

- NTP #1 (February 25, 2014): The Guard House and road widening component.
- NTP #2 (May 27, 2014): Construction of new administrative buildings, removal of old buildings, and development of Fill Sites P-41 and P-43.
- NTP #3 (July 18, 2014): Construction of the Central Compressor Station (CCS), grading for the Natural Substation, and installation of five tubular steel poles (TSPs) and string conductor.
- NTP-A (October 28, 2014): Work along Natural-Newhall-San Fernando and MacNeil-Newhall-San Fernando 66-kilovolt (kV) subtransmission lines and at the San Fernando, Newhall, Chatsworth, Sunshine, and MacNeil substations.
- NTP-B (February 24, 2015): Construction of a portion of Telecommunications Route 3 from the San Fernando Substation to the temporary San Fernando Substation Tap.
- NTP-C (April 14, 2015): Construction and telecommunication installation associated with the MacNeil-Newhall-San Fernando and Natural-Newhall-San Fernando 66-kV subtransmission lines.
- NTP-D (June 8, 2015): Additional construction and telecommunication installation associated with the MacNeil-Newhall-San Fernando and Natural-Newhall-San Fernando 66-kV subtransmission lines, and construction of the Natural Substation.
- NTP-E (September 21, 2015): Additional construction and telecommunication installation on Telecommunications Routes 1, 2, and 3.

Onsite compliance monitoring by the Ecology and Environment, Inc. (E & E) compliance team during this reporting period focused on spot-checks of ongoing construction activities. Compliance Monitor Vince Semonsen visited the Aliso construction site on February 22, 2017. A site inspection report that summarizes observed construction activities and compliance events and verifies mitigation measures (MMs)/applicant proposed measures (APMs) was completed for the site visit. The report is attached below (Attachment 1).

Overall, the ACTR Project has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program's (MMCRP) Compliance Plan. Communication between the CPUC/E & E compliance team and SCG and SCE has been regular and generally effective; correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Regular agency calls between CPUC/E & E, SCG, and SCE, along with weekly email updates from SCG and SCE, provided additional compliance information and construction summaries. Furthermore, SCG's monthly compliance status report for February 2017 provided a compliance summary and included: a description of construction activities from February 1 to 28, 2017; a detailed look-ahead construction schedule; a summary of compliance with project commitments (MMs/APMs) for air quality, biological resources, cultural and paleontological resources, the Storm Water Pollution Prevention Plan (SWPPP), noise, and the Worker Environmental Awareness Training Program (WEAP); a summary of non-compliance incidents; and a list of recent ACTR Project approvals.

In February 2017, SCE did not conduct any construction activities, beyond restoration and weed abatement; SCE's construction activities are nearly completed for the ACTR Project. Therefore, beginning February 22, 2017, CPUC/E & E is no longer requiring SCE to provide a weekly status report. SCE has some outstanding construction components to complete and will notify CPUC/E & E when those activities are scheduled. SCE will no longer provide monthly compliance status reports to the CPUC; however, SCE will provide CPUC/E & E with a final construction close-out report.

#### Non-Compliance Issued by the CPUC

#### **Level 1 Non-Compliance (SCG)**

On February 22, 2017, the CPUC Compliance Monitor Vince Semonson observed an SCG contractor (Henkels & McCoy) truck parked inside a red-tailed hawk nest buffer. The CPUC Compliance Monitor informed SCG's environmental manager. SCG reported the encroachment into the buffer to the CPUC on February 23, 2017. SCG reported that the Henkels &McCoy crew was performing routine maintenance on a telecommunications pole for operations and maintenance. The crew acknowledged seeing the sign, but assumed they could park there for a short duration. The CPUC Compliance Monitor issued SCG a level 1 non-compliance for this encroachment (Attachment 1).

SCG's avian biologist surveyed the nest on February 23, 2017, observed the bird arranging sticks in the nest, and later observed the bird flying above the nest. Based on her observations, the avian biologist concluded that it was unlikely the nest was impacted by the encroachment.

Numerous bird nests are detected in and near project areas during the nesting bird season (approximately February 1 through August 31). The ACTR Project's Nesting Bird Management Plan requires that exclusionary buffers are placed around active nests in order to comply with ACTR Project commitments to protect nesting birds as well as with state and federal regulations. Regular training and refreshers for construction crews, including operations and maintenance crews, as well as the establishment of clear buffers in the field are important for compliance with the Nesting Bird Management Plan and applicable regulations. In response to the encroachment, SCG committed to holding a nesting bird tutorial for Henkels & McCoy crews on proper compliance with nesting bird protection measures.

#### **Special Status Species Observations**

Five live California newts, a California Department of Fish and Wildlife (CDFW)-designated Species of Special Concern, were observed during February 2017; four of the newts were relocated out of harm's way. Five dead newts were documented during February 2017. The dead newts were collected in accordance with CDFW requested protocol.

#### **Public Concerns**

There were no public concerns during February 2017.

### **Minor Approvals**

During February 2017, two email approvals were issued (see Table 1).

**Table 1: Minor Approvals for February 2017** 

Description	Approval Date
Email approval to cease biological monitoring on weekends when the scope of work is minor and restricted to the interior of the CCS (SCG).	February 3, 2017
Email approval to cease submitting weekly and monthly reports (SCE).	February 22, 2017

Please note that going forward, the reporting period for summary reports to the CPUC will be two months instead of one, as construction is nearly complete. Feel free to contact me if you have any questions concerning this summary report.

Sincerely,

Lara Rachowicz

Lara Rachowicz

Project Manager, Ecology and Environment, Inc.

cc:

Derek Rodgers, SCG Chris May, SCE

# **ATTACHMENT 1**

CPUC Site Inspection Report February 22, 2017



# Aliso Canyon Turbine Replacement Project CPUC Site Inspection Form

Project:	Aliso Canyon Turbine Replacement	Date:	February 22, 2017
Project Proponent:	Southern California Gas Company and Southern California Edison	Report #:	VS130
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Andrew Barnsdale, Energy Division	AM/PM Weather:	Partly cloudy and warm with a slight breeze
E & E CM:	Lara Rachowicz	Start/End time:	0945 to 1300 at SCG
Project NTP(s):	The new Admin/IM Building (NTP-2 power line (NTP-3), and PS-42 Fill		r Station (CCS) (NTP-3), 12-kilovolt (kV)

## SITE INSPECTION CHECKLIST

WEATP Training	Yes	No	N/A
Has WEATP training been completed by all new hires (construction and monitors)?	Χ		
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	Χ		
Are erosion and sediment control measures properly installed and functioning?	Χ		
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?	Χ		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Χ		
Is excessive fugitive dust leaving the work area?		Х	
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	Χ		
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?	Χ		
Are vehicles/equipment turned off when not in use?	Χ		
Work Areas			
Is vegetation disturbance within work areas minimized?	Χ		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Χ		
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		
Are all excavations and trenches covered at the end of the day?	Χ		

Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	X		
Biology			
Have preconstruction surveys been completed for biological (wildlife, nesting birds, gnatcatcher, least Bell's vireo) resources as appropriate?	Х		
Are biological monitors present onsite?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Have wildlife been relocated from work areas?		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		Х	
Did you observe any threatened or endangered species? List:		Х	
Are there wetlands or water bodies present near construction activities?	Х		
Have there been any work stoppages for biological resources?		Х	
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			Х
Are archaeological and paleontological monitors onsite if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources?		Х	
Hazardous Materials			
Are hazardous materials stored appropriately?	Х		
Are procedures in place to prevent spills and accidental releases?	Х		
Are appropriate fire prevention and control measures in place?	Х		
Is contaminated soil properly handled or disposed of, if applicable?	Х		
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	Х		
Is construction occurring within approved hours?	Х		
Are noise control measures in place within 100 feet of sensitive receptors as needed?			Х

AREAS MONITORED (i.e., structure numbers, yards, or substations)

PS-42 Fill Site, CCS, new Admin/IM Building, 12-kV power line pole work, and Limekiln Creek.

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)

I arrived at the ACTR Project site at 0945 and my first stop was the lower sedimentation basin/newt pond along Limekiln Creek, just upstream of the Guard House (Photo 1). The pond had been recently cleaned out, but additional sediment had been deposited after the recent rains.

At the main access road, I noted that the bird buffer signs were in place for the red-tailed hawk nest in the large sycamore tree just off of the roadway. A Henkels & McCoy (H&M) work truck was parked in the road turnout within the buffer zone, and cones were in place. When I met with SGE's monitor, Ray Romero (AECOM), and Derek Rodgers (SCG) later in the day, I discussed the H&M truck with them. They indicated that the truck was part of an operations and maintenance (O&M) job, but they would follow up with the crew.

I drove to the PS-42 Fill Site. The top of the site had filled with water (Photo 2), but the water had just been pumped into five baker tanks located on the well pad adjacent to the PS-42 Fill Site. Water from the tanks would be drained into the PS-42 Fill Site drainage system (Photo 3); the water in the tanks looked clear. I spoke with SCG's monitor, Ray Romero (AECOM), about this system. Ray Romero said that the crew was allowing the sediments in the water to settle out in the baker tanks; crews would test the water prior to its release into the culverts. I drove/walked to the box culvert at the bottom of the PS-42 Fill Site noting that the water was flowing as intended (Photo 4), and I did not observe any erosion issues downstream of the riprap. The grate in the box culvert was nearly clogged with soil, rock, debris, and vegetation, although the water was flowing through the grate. I observed a hawk sitting on the existing nest in the big oak tree just downstream of the PS-42 Fill Site; the hawk did not seem disturbed by my presence. I reported this to Ray Romero (AECOM) in case they want to send a crew to clean out the box culvert.

At the Natural Substation, all areas appeared to be in good condition, even after the heavy rains. It appeared that large amounts of water must have flowed through the upper portion of the oak swale since the stabilization best management practices (BMPs) had been compromised (i.e., the rock had been moved and the coconut matting was quite degraded) (Photo 5).

After returning from the Natural Substation, I stopped at the ACTR Project office and spoke with SCG's monitor, Ray Romero (AECOM), and Derek Rodgers (SCG).

Photo 6 shows the upper sedimentation basin/newt pond; this pond had also been cleaned out. According to Ray Romero (AECOM), this was an O&M operation, but a biologist had been onsite monitoring the sediment removal; no newts were observed. Monitors continue to be present during weekend work, since SCG's construction contractor, Kiewit, needed to drive and park by their trailers.

The 12-kV/TSP A2 access road was in good condition, with additional BMPs added along the road (Photo 7). The silt fence diversion structure was in place and appeared to have withstood the heavy rains (Photo 8). Erosion continues to take place within the oak swale drainage, with deepening rills and more rock and mud being deposited downstream of the silt fencing. The fenced-off oak sapling near TSP A2 would benefit from pruning the damaged branches and resetting the fence (Photo 9).

The bioswale in the CCS appeared to be in good condition, with only minimal amounts of sediment noted near the inlets (Photo 10).

Most of the slopes around the CCS and the new Admin/IM Building appeared stable and had extensive vegetative growth (Photo 11); however, the slope just behind the lower new Admin/IM Building would benefit from BMPs (Photo 12). Paving appears to have been completed around the new Admin/IM Building (Photo 13), and the bioswale is in good condition (Photo 14).

	MITIGATION MEASURES VERIFIED (Refer to MMCRP, e.g., MM BR-5. Report only on MMs pertinent to your observations today)					
Onsite monitors were in place and overseeing the construction activities; all construction personnel appear to have gone through the training (APM HZ-6).						
RECOM	MENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)					
Check th	e TSP A2 access road and the drain culvert below the PS-42 Fill Site after major rain e	events.				
	ANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to impropental observations of note)	ove compliance	on-site,			
Bird nest	ing season has begun; therefore, surveys need to be verified and oversight should be	in place.				
Below ple occurred and for n	ANCE SUMMARY  ease describe any non-compliance issues or new biological/cultural discoveries (complia since your last visit. If you observe a non-compliance issue in the field, please note this con-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form.  Inform E & E CM of any non-compliance incidents.	on the monitorin	g datasheet,			
	pliance Level 0: New biological or cultural discovery requiring compliance with mitigati litions, etc. If checked, please describe discovery and documentation/verification below		ermit			
envi	Compliance Level 1: Violates the project's environmental requirements but does not in ronmental resources at risk. Applicant will need to correct the action and/or prevent repe. If you checked this box, describe the incident below and follow-up to ensure corrections.	peat incidents o	f the same			
imm mea occu	Compliance Level 2: (Minor Incident) Level 2 should be those actions that have the postediate, minor risk to environmental resources such as activities that result in a deviation sure requirements that result in minor, short-term impact to resources. A non-compliant when Level 1 incidents are repeated, and show a trend toward placing resources at each this box, please fill out a Non-Compliance Report.	n from the mitig	ation ation may			
imm the a requ	Non-Compliance Level 3: (Major Incident) Level 3 are those actions that have the potential to cause or cause immediate, major risk to environmental resources such as: major environmental incident that is not in compliance with the applicant mitigation measures, mitigation measures, permit condition, approval (e.g., variances, addendums) requirements, and/or environmental construction specifications; violation of the law; or documented repetitive occurrences of Level 2 Minor Incident events. If you checked this box, please fill out a Non-Compliance Report.					
SoC	-compliance issues reported by SoCalGas or SCE: Were there any new non-compliance alGas or SCE monitors since your last visit? If so, describe issues and resolution and it identification number.					
Date	Non-compliance issue and resolution	Relevant	NC			
Daio	11011 compilation issue and resolution	Mitigation Measure	Report #			
2/22/17	Level 1 issued for bird buffer violation. See description above.	MM BR-8				

PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:	
PREVIOUS NON-COMPLIANCE HEMS REQUIRING FOLLOW-UP OR RESOLVED TODAT.	

REPRESENT	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
2/22/17	Lower Sedimentation Basin/Newt Pond Near the Guard House		Photo 1 – The lower sedimentation basin/newt pond had been cleaned out, but an additional sediment had filled in a portion of it.		
2/22/17	PS-42 Fill Site		Photo 2 – Overview of the PS-42 Fill Site where accumulated rainwater runoff had been recently pumped.		

REPRESEN	TATIVE SITE PHO	OTOGRAPHS	
Date	Location	Photo	Description
2/22/17	PS-42 Fill Site		Photo 3 – Water from the PS-42 Fill Site is pumped into baker tanks. The baker tanks are then drained into the PS-42 Fill Site drainage system.
2/22/17	PS-42 Fill Site		Photo 4 – Water exiting the drainage pipe at the base of the PS-42 Fill Site. Note the rock, mud, debris, and vegetation nearly covering the box culvert grate.

REPRESE	NTATIVE SITE PHO	DTOGRAPHS	
Date	Location	Photo	Description
2/22/17	Oak Swale Near the Natural Substation		Photo 5 – Drainage stabilization measures (i.e., rock and coconut matting) within the oak swale have been degraded by the high flows of rainwater runoff.
2/22/17	Upper Sedimentation Basin/Newt Pond		Photo 6 – Sediment has been cleaned out of the upper sedimentation basin/newt pond.
2/22/17	TSP A2 Access Road		Photo 7 – Enhanced BMPs at the entrance to the TSP A2 access road.

	NTATIVE SITE PHO		
Date	Location	Photo	Description
2/22/17	TSP A2 Access Road		Photo 8 – Silt fencing used to divert water away from the TSP A2 access road. Erosion rills continue to deepen within the oak swale.
2/22/17	TSP A2 Access Road		Photo 9 – Oak sapling near TSP A2 could benefit some maintenance (pruning and fence repair).

REPRESEN	ITATIVE SITE PHO	TOGRAPHS	
Date	Location	Photo	Description
2/22/17	Bioswale within the CCS		Photo 10 – The CCS bioswale is in good condition and well maintained.
2/22/17	CCS		Photo 11 – Overview of the CCS.

REPRESENT	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
2/22/17	New Admin/IM Building		Photo 12 – The slope behind the lower new Admin/IM Building would benefit from some BMPs.		
2/22/17	New Admin/IM Building		Photo 13 – Paving and landscaping have been completed at the upper new Admin/IM Building.		
2/22/17	New Admin/IM Building Bioswale		Photo 14 – The bioswale is in good condition.		

Date Location Photo Description  2/22/17  12-kV Poles  Photo 15 – Overvie the 12Kv poles – the rains have "greened the hills.  Photo 15 – Overvie the 12Kv poles – the rains have "greened the hills.