

California Public Utilities Commission Mitigation Monitoring, Compliance, and Reporting Program

CalPeco 625 and 650 Electrical Line Upgrade Project

Compliance Status Report: 001

August 25, 2015

SUMMARY

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Statement (EIS)/EIS/Environmental Impact Report (EIR) for the CalPeco 625 and 650 Electrical Line Upgrade Project. The CPUC has established a third-party monitoring program and adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure that measures approved in the FEIS/EIS/EIR to mitigate or avoid impacts are implemented in the field. This MMCRP status report is intended to provide a description of construction activities for the project, a summary of site inspections conducted by the CPUC's third-party monitors, the compliance status of mitigation measures required by the MMCRP, and anticipated construction activities. This compliance status report covers construction activities from August 9 through August 22, 2015.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party environmental compliance monitor conducted site observations in areas of active construction. Observations were documented using site inspection forms, and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

Implementation Actions

CalPeco's contractor, Summit Line Construction (Summit), installed entrance stabilization materials at the Highway 267 ingress/egress points, consistent with required best management practices (BMPs). Summit also installed timber matting along the power line right-of-way (ROW) in Martis Valley west of Highway 267 within limited, 20-foot-wide work area. Temporary timber bridges were installed within the limited work area in Martis Valley across drainages with discernible flow. Summit sub-contractor Kelley Erosion Control installed silt fencing along the ROW, as necessary. Work area boundary fencing was installed along the ROW to identify the extent of approved work area. Exclusion fencing was installed at appropriate locations along the ROW for identified sensitive resources and to delineate

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cultural sites. Signs were posted along the ROW to identify weed cleaning stations (APM-BIO-5), speed limits (APM-AQ-7), and sensitive resource exclusion areas (APM-BIO-26). Summit also initiated pole hole excavation activities within Martis Valley.

In compliance with APM-BIO-26, work areas were clearly marked with fencing, staking, flagging, or another appropriate material. All project work and equipment was confined to delineated work areas. In compliance with APM-BIO-5, vehicles and equipment arrived at the project area clean and weed-free and were inspected by the on-site environmental monitor for mud or other signs that weed seeds or propagules could be present prior to use in the project area. In compliance with APM-BIO-1, APM-CUL-7, APM-CUL-10, and APM-HAZ-1, Liberty Utilities designed and implemented a Worker Environmental Awareness Program (WEAP) for all personnel entering the project area. Liberty Utilities provided the required environmental awareness training to approximately 27 personnel.

Mitigation Measure Tracking

Mitigation measures applicable to the construction activities were verified in the field and documented in the CPUC's mitigation measure tracking database. A complete list of mitigation measures and applicant proposed measures is included in the project's MMCRP, as referenced in the Decision for the CalPeco 625 and 650 Electrical Line Upgrade Project, as adopted by the CPUC on March 27, 2015 (Decision D.15-03-020).

Compliance Status

Pre-construction mitigation measures have been completed as indicated in Notice to Proceed (NTP) No. 1 and No. 2 (Attachment B). Applicable mitigation measures were verified during site inspections and were determined to be implemented in accordance with the MMCRP, except as discussed below.

During a compliance monitoring visit on August 12, 2015, Dudek monitors observed cut tree paint markings on the road side of trees along Highway 267, inconsistent with the measures outlined in APM-SCE-1. Dudek notified Liberty Utilities of this non-compliant condition on August 14, 2015. Liberty Utilities notified the CPUC on August 16, 2015 that, as a corrective action, observed tree marking paint was covered with black paint in areas where the cut tree markings were noticeable from public roadways. During a subsequent compliance monitoring visit on August 19, 2015, Dudek observed that some cut tree paint markings had not been covered with black paint. Dudek notified Liberty Utilities of this non-compliant condition again on August 20, 2015. Liberty Utilities notified the CPUC on August 20, 2015 that all remaining road-side tree markings had been covered with black paint as of that date. Confirmation that corrective actions have been implemented will be verified in the field on subsequent monitoring visits.

During a compliance monitoring visit on August 19, 2015, Dudek monitors observed topsoil from excavated pole holes had been separated and piled, with wattles installed; however, the piles were not covered, as required under APM-BIO-23. Dudek monitors also observed that, in some locations,

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excavated pole holes in Martis Valley had been covered by dragging timber matting over the hole. This resulted in overland travel in areas where the matting had been displaced along the construction ROW, inconsistent with the work covered under NTP-2 and the project's 401 Water Quality Certification. Dudek notified Liberty Utilities of these non-compliant conditions on August 20, 2015. Liberty Utilities notified the CPUC on August 20, 2015 that, to address these issues, all topsoil piles will be covered and plywood or other adequate material will be used to cover open excavations so that shifting of the matting would not be necessary. Confirmation that these corrective actions have been implemented will be verified in the field on subsequent monitoring visits.

During a compliance monitoring visit on August 19, 2015, Dudek monitors also observed gaps in the temporary timber bridges (not timber matting) crossing drainages in Martis Valley. This condition may result in the potential for sediment from construction vehicle travel to be discharged into waters located beneath the bridge deck. No discharge into waters beneath the bridge decks was observed, but displaced soil was observed on top of timber matting along the construction right-of-way, which could potentially be tracked to temporary bridge locations. Dudek notified Liberty Utilities of this condition on August 20, 2015. Liberty Utilities notified the CPUC on August 20, 2015 that, when loose soil is present on the timber matting, shovels and/or brooms will be used to clear the soil from the matting, away from drainages, eliminating the possibility of the soil being tracked to the temporary timber bridges and potentially to the drainages below. Confirmation that this corrective activity is being implemented and that soil discharge is not occurring will be verified in the field on subsequent monitoring visits.

CONSTRUCTION PROGRESS

The project has been broken into three phases, as summarized below:

Phase 1 (Rebuild and Upgrade of the 650 Line (Including the Northstar Fold (2015-2016))

Pre-Construction Invasive Weed Treatment (CPUC NTP No. 001)

Pre-construction weed treatment in areas identified in the project's Invasive Plant Risk Assessment document was initiated on July 2, 2015, consistent with APM-BIO-4. Weed treatment activities covered under NTP-1 were completed in July 2015.

650 Line Rebuild (CPUC NTP No. 002)

Project tasks associated with the 650 Line rebuild were initiated on August 10, 2015. During the period covered by the report, the following tasks were completed or initiated: wood matting and temporary timber bridges were installed along the ROW through Martis Valley; sensitive resource areas were flagged and fenced; pre-construction BMPs (silt fencing, exclusion fencing, and work area fencing) were installed along the ROW; construction signage was installed along the ROW; equipment and construction materials, including pole bases, were delivered to the site and staged along the ROW; and pole holes were excavated in Martis Valley.

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The estimated completion date for the 650 Line rebuild is October 2015.

<u>Vegetation Management (Pole 291034 to 291169 and Pole 291105 to Northstar Substation) (CPUC NTP No. 002)</u>

Expected to begin on August 31, 2015. Estimated completion date is October 2015.

Northstar Substation Rebuild (CPUC NTP No. 002)

Not Started. Estimated completion date is October 2015.

Phase 2 (Substation Upgrades, Decommissioning of the Brockway Substation (2017))

Not Started. Estimated completion date is October 2017.

Phase 3 (Upgrade of the 625 Line and Additional Modifications of the Substation (2019-2020))

Not Started. Estimated completion date is October 2020.

CONSTRUCTION SCHEDULE

Phase 1 (Rebuild and Upgrade of the 650 Line (Including the Northstar Fold (2015-2016))

Pre-Construction Invasive Weed Treatment (CPUC NTP No. 001)

Completed in July 2015.

650 Line Rebuild (CPUC NTP No. 002)

Initiated on August 10, 2015, estimated completion date is October 2015.



ATTACHMENT A Photos

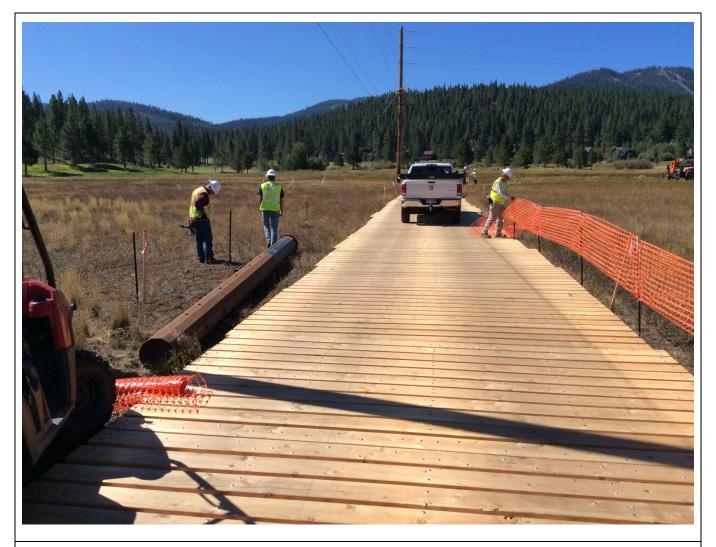


Photo 1: Crews installing work area fencing in Martis Valley to delineate approved work areas, consistent with APM-BIO-26 and the project's Flagging, Fencing, and Signage Plan. Work in this area is restricted to a 20-foot-wide portion of the ROW and timber matting has been installed to minimize impacts from vehicle and equipment travel. Also note that clearance is being provided at fence bottoms to allow for wildlife movement through the ROW.



Photo 2: Timber matting being installed within the 20-foot-wide portion of the ROW to minimize impacts from vehicle and equipment travel



Photo 3: Fencing installed to delineate approved work areas and sign indicating sensitive resource exclusion area, consistent with APM-BIO-26 and the project's Flagging, Fencing, and Signage Plan. Second sign identifies noxious weed cleaning station, consistent with APM-BIO-5.



Photo 4: Timber matting in Martis Valley shifted onto open excavations, resulting in overland travel in upland areas. Liberty Utilities stated they will use other materials to cover excavations, which will be confirmed in subsequent compliance inspections.



Photo 5: Topsoil salvaged and segregated in accordance with APM-BIO-23; however, the pile is not covered, as required under APM-BIO-23. Liberty Utilities stated they will cover topsoil piles, which will be confirmed in subsequent compliance inspections.



Photo 6: Material being staged inside fenced work area with project access via timber matting through Martis Valley.

ATTACHMENT B Notices to Proceed

NTP No.	Date Issued	Description	Conditions Included (Y/N)
CPUC-001	July 2, 2015	Pre-Construction Weed Treatment from Martis Tap Pole to Brockway Summit	Y
CPUC-002	August 5, 2015	650 Line Re-Build Between the Martis Tap Pole and the Northstar Substation, Northstar Substation Civil Work, and Vegetation Management Between the Martis Tap Pole and Brockway Summit	Y

ATTACHMENT C Minor Project Refinement Request

Minor Project Refinement Request No.	Submitted	Description	Status	Approval
-	-	-	-	-