

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p>
	<p>CalPeco 625 and 650 Electrical Line Upgrade Project</p> <p>Compliance Status Report: 003</p> <p>September 22, 2015</p>

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 September 6 through September 19, 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 biological and cultural monitors were present during project construction activity (except as noted below), consistent with APM-BIO-1, APM-BIO-21, and APM-CUL-1. Environmental monitors inspected excavated holes in accordance with APM-BIO-22 and holes were covered daily as construction activity ceased for the day. Project work areas were kept free of trash/debris, consistent with APM-BIO-33. Project best management practices (BMPs) were maintained along the ROW, consistent with APM-SOILS-1. Timber matting along the right-of-way (ROW) within Martis Valley was maintained, consistent with the work covered under NTP-2 and the project’s 401 Water Quality

Certification. Water trucks were on-site to control fugitive dust, as required under APM-AQ-1. Salvaged topsoil stockpiles were covered as required under APM-BIO-23.

Work area boundary fencing and flagging was maintained along the ROW to identify the extent of approved work area. Exclusion fencing was maintained at appropriate locations along the ROW for identified sensitive resources and to delineate cultural sites. Signs were maintained along the ROW to identify weed cleaning stations (APM-BIO-5), speed limits (APM-AQ-7), and sensitive resource exclusion areas (APM-BIO-26). Refueling areas were identified with signs and located 100 feet from waterways (APM-WQ-1). Fire suppression equipment was kept within 25 feet of chainsaw use areas, as required under APM-HAZ-5.

In compliance with APM-BIO-26, work areas were clearly marked with fencing, staking, flagging, or another appropriate material. Silt fencing was installed along the work area boundary for tree removal areas. All project work and equipment was confined to delineated work areas, except as noted below. 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 continued to implement a Worker Environmental Awareness Program (WEAP) for all personnel entering the project area. Liberty Utilities provided the required environmental awareness training to approximately 13 personnel during the reporting period.

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. 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.

Liberty Utilities identified the following non-compliant actions in their Weekly Compliance Summary Report covering the period from September 7 to September 13, 2015:

- Materials Placement Outside of Delineated Work Areas: On September 8, 2015, construction materials were temporarily placed outside of the delineated work area boundary at Poles #291073, #291074, and #291079, inconsistent with the requirements of APM BIO-26, which requires that all

project personnel and equipment remain confined to delineated work areas. The result was that materials contacted the ground beyond the delineated work area and within a known cultural resource site (CA-PLA-6), resulting in minor ground disturbance. Similar incidents happened again on September 10 and 11, 2015, with materials being temporarily placed outside of delineated work areas within a known cultural resource site (CA-PLA-6), also resulting in minor ground disturbance. No archaeological monitors were on site for either incident, inconsistent with the project's Cultural Resources Protection, Monitoring and Unanticipated Discovery Plan required under APM-CUL-8. Although Liberty Utilities reported that the incidents were described to the cultural monitoring team, and no concerns were expressed.

- Non-Compliance with Weed-Cleaning Requirements: On September 9, 2015, four trucks left the construction area near Pole #291038 without stopping to be cleaned for noxious weeds, inconsistent with the requirements outlined in APM-BIO-6. As a corrective action, a meeting was held with the construction crews on September 11, 2015 to address this issue and reinforce the importance of maintaining compliance with the project environmental requirements and the potential penalties associated with noncompliance.

A call to discuss these issues and reporting requirements under the project's MMCRP was held on September 18, 2015 and included representatives from the CPUC (Dudek), Liberty Utilities, Insignia Environmental, Trisage Consulting, and Summitline Construction. During the call, Liberty Utilities was notified that a formal Noncompliance Report would be prepared to address: 1) compliance with MMCRP reporting protocols; 2) minor deviation and noncompliance trends identified in Liberty Utilities' Weekly Compliance Status Reports; and 3) communication between compliance monitors and construction crews. The Noncompliance Report is currently being prepared and will be summarized in Compliance Status Report 004.

Liberty Utilities notified the CPUC that the location of a previously reported deviation at Pole #291082 on September 4, 2015 was erroneous. The incident occurred at #Pole 291083 and all other details of the reported deviation were accurate.

Liberty Utilities notified the CPUC that, on September 15, 2015, a hydraulic line ruptured in a line truck at Pole #291098, resulting in a release of hydraulic fluid in an upland area. The amount spilled was determined to be less than 1 gallon. Clean-up materials were available on site and the spill was cleaned up and disposed of properly.

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 this report, the following tasks were completed or initiated:

- On September 8, 2015, the road work contractor mobilized to the project site and began developing the new access to the Northstar fold and Poles #291262, #291263, #291265, and #291269, and accesses along the east side of SR 267, from Pole #291098 to #291101, and from Pole #291096 to #291097.
- All transmission and distribution conductor has been pulled, tensioned, sagged and clipped in between Poles #291039 and #291068. This segment was re-energized on September 8, 2015 and the three generators (supporting water well pump houses and the sanitary sewer lift station) were removed.
- Completion of installation work:
 - All new structures completely installed, including fiber and communications cable, through Martis Valley, between Poles #291039 to #291068;
 - Top half of existing wooden poles through Martis Valley cut and removed from site;
 - Existing wooden pole bases cut to ground through Martis Valley and removed from site;
 - Existing wooden pole tops and bases cut and removed from site from Poles #291035 to #291039;
 - Pole bases installed and backfilled up to Pole #291094 and from Pole #291102 to #291104;
 - Pole hole excavations completed up to Pole #291087 and #291095, #291096, #291098, and #291099;
 - Pole tops installed up to Pole #291083; and
 - Excavation drilled, rebar cage and anchor bolts set, and concrete poured for foundations for Poles #291105, #291261, and #291263.

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

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

Tree removal has been completed between Poles #291101 to just south of Pole #291105 and along the Northstar fold alignment, between Pole #291105 up to and around the Northstar substation (Pole #291273). Tree removal continued along the east side of SR 267, within the Truckee Donner Land Trust parcel.

The estimated completion date for the 2015 phase of vegetation management is November 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: Topsoil salvage piles covered with BMPs installed (straw wattles), consistent with APM-BIO-23.

ATTACHMENT A (Continued)



Photo 2: Concrete base at Pole #291101 covered and ROW fenced consistent with APM-BIO-26.

ATTACHMENT A (Continued)



Photo 3: Ineffective covering of excavated pole hole. Monitors to inspect excavated pole holes daily for trapped wildlife, consistent with APM-BIO-22.

ATTACHMENT A (Continued)



Photo 4: Firefighting equipment available within 25 feet of any chainsaw activity consistent with APM-HAZ-5.

ATTACHMENT A (Continued)



Photo 5: Tree felling near the Northstar substation.

ATTACHMENT A (Continued)



Photo 6: Cut stump less than 6 inches and treated with Sporax consistent with APM-BIO-4.

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
-	-	-	-	-