

May 28, 2019

Michael Rosauer
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Monthly Report Summary #4 for the Sanger Substation Expansion Project

Dear Mr. Rosauer,

Construction for the Sanger Substation Expansion Project began on November 5, 2018. This report provides a summary of the compliance monitoring activities that occurred during the period from **February 1 to 28, 2019**, for the Sanger Substation Expansion Project in Fresno County, California. Compliance monitoring was performed to ensure that all project-related activities conducted by Pacific Gas & Electric (PG&E) and their contractors comply with the requirements of the Final Initial Study/Mitigated Negative Declaration (Final IS/MND) for the Sanger Substation Expansion Project, as adopted by the California Public Utilities Commission (CPUC) on July 13, 2017.

Table 1 summarizes CPUC-approved Notice to Proceed (NTP) activities to-date for the Sanger Substation Expansion Project, based on activities proposed in PG&E's Notice to Proceed Requests (NTPRs).

Table 1 CPUC-approved NTP Activities for the Sanger Substation Expansion Project

NTP#	Final NTP Submittal Date	CPUC NTP Issuance Date	Description of Approved Activities
NTP #1	11/1/2018	11/2/2018	Work within both the existing Sanger Substation footprint and the expansion area, including laydown/staging area setup; installation of access driveways, fencing, foundations, substation equipment, and a microwave tower; and installation of two antenna dishes at an off-site location (Fence Meadow Repeater Station).

Table 2 summarizes all CPUC-approved Minor Project Refinements (MPRs) to-date for the Sanger Substation Expansion Project.

Table 2 CPUC-approved MPRs for the Sanger Substation Expansion Project

MPR#	Final MPR Submittal Date	CPUC MPR Approval Date	Description of Minor Project Refinement
MPR #001	5/24/2018	6/12/2018	Minor modifications to the placement and types of poles in the "power line reconfiguration" project component to suit engineering refinements that were made after Final IS/MND approval. The modifications would occur approximately 2,100 feet west; 750 feet east; and 165 feet south of the existing Sanger Substation footprint. In total, there would be modifications to seven poles.

Table 2 CPUC-approved MPRs for the Sanger Substation Expansion Project

MPR#	Final MPR Submittal Date	CPUC MPR Approval Date	Description of Minor Project Refinement
MPR #002	7/17/2018	7/20/2018	An additional temporary laydown yard/staging area (approximately 974 feet by 112 feet) located north of the retention basin, running north between the western boundary of the substation expansion area and the western boundary of the existing Sanger Substation footprint. This area is owned in fee title by PG&E.
MPR #003	11/13/2018	11/14/2018	Use of an existing water well approximately 100 feet north of approved NTP #1 work areas, within the same parcel as the Sanger Substation footprint. PG&E has obtained permission from the landowner to use this well for a specified timeframe. PG&E will access the well pump by foot, and will obtain water from this well for dust control purposes. MPR #3 adds no additional ground disturbance to the existing disturbance footprint, other than impacts from light foot traffic and temporary ground placement of a water hose.

Project Compliance Incidents

Onsite compliance monitoring by the Ecology and Environment, Inc., member of WSP (hereafter referred to as E & E) compliance team during this reporting period focused on spot-checks of ongoing construction activities. Compliance Monitor Ben Arax visited the Sanger Substation construction site on **February 14 and 26, 2019**. CPUC Compliance Monitoring Reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and applicant proposed measures (APMs) were completed for the site visits. These reports are attached below (Attachment 1).

Overall, the Sanger Substation Expansion 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 PG&E has been regular and effective; the correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between the CPUC/E & E and PG&E, along with daily schedule updates and database notifications, provided additional compliance information and construction summaries. Furthermore, PG&E’s weekly compliance status reports provided a compliance summary, a description of construction activities that occurred each week, a summary of compliance with MMCRP conditions (MMs/APMs) for biological, cultural and paleontological resources; the Storm Water Pollution Prevention Plan (SWPPP); noise and traffic control; onsite hazards; and the Worker Environmental Awareness Program (WEAP), as well as any non-compliance issues and resolutions, and public complaints and notifications.

Compliance Incidents and Minor Compliance Observations

During the February 2019 reporting period, PG&E did not self-report any compliance incidents, and the CPUC did not issue any compliance incident reports. During the February 2019 reporting period, the CPUC Compliance Monitors observed some erosion control best management practice (BMP) repair needs following large rain events, particularly for silt fence installations. However, the BMPs continued to function as intended and repairs were addressed promptly.

Mr. Michael Rosauer
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Noise Compliance

During the February 2019 reporting period, there were no exceedances of the stipulated noise levels.

Public Concerns

No public concerns were reported during February 2019.

Sincerely,



Ilja Nieuwenhuizen
Project Manager, Ecology and Environment, Inc.

cc:

Michael Calvillo, PG&E
Carie Montero, Parsons
Lincoln Allen, SWCA

ATTACHMENT 1

CPUC Compliance Monitoring Reports

February 14 and 26, 2019



Sanger Substation Expansion Project CPUC Compliance Monitoring Report

Project Proponent	Pacific Gas & Electric (PG&E)	Report No.	CM-CPUCBA-021419
Lead Agency	California Public Utilities Commission (CPUC)	Date (mm/dd/yy)	02/14/19
CPUC Project Manager	Michael Rosauer	Monitor(s)	Ben Arax
CPUC (Ecology and Environment, Inc., member of WSP [E & E]) Monitoring Manager	Ilja Nieuwenhuizen	AM/PM Weather	62°F, partly cloudy, wind SSE 17 miles per hour (mph)
CPUC (E & E) Monitoring Supervisor	Aileen Cole	Start/End Time	10:28 AM – 11:00 AM
Project Notices to Proceed NTP(s)	NTP #1		

SITE INSPECTION CHECKLIST *(Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)*

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all onsite personnel (e.g., construction workers, managers, inspectors, monitors)?	X		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (best management practices [BMPs]) been installed in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP)?	X		
Are erosion and sediment control measures (BMPs) installed correctly (without apparent deficiencies) and functioning as intended during rain events?	X		
Are measures in place to avoid/minimize mud tracking onto public roadways?	X		
Is dust control being implemented, in accordance with the Dust Control Plan (e.g., access roads watered, haul trucks covered, dirt piles are covered with tarps, pull-outs and streets cleaned on a regular basis)?	X		
Are work areas being effectively watered prior to excavation or grading?	X		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	X		
Equipment	Yes	No	N/A
Are vehicles maintaining speed limits: 15 mph on unpaved roads/10 mph off-road?	X		
Are observed vehicles/equipment arriving onsite clean of sediment/mud and noxious weeds or other plant debris?	X		

Are observed vehicles/equipment turned off when not in use?	X		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	X		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources, as appropriate?	X		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	X		
Are trenches/excavations covered at night, or when not possible, are wildlife escape ramps installed, constructed of earth fill or wooden planks no less than 10 inches wide?	X		
Biology	Yes	No	N/A
Have required preconstruction surveys been completed for biological resources (special status species, raptors and other nesting birds, burrowing owls, San Joaquin kit fox), as appropriate?	X		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, appropriate buffer distance enacted)?	X		
Is project complying with biological monitoring requirements (e.g., if required, are monitors present)?	X		
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features (e.g., is the refueling/maintenance buffer in place within 100 feet of the irrigation ditch)?	X		
Has wildlife (sensitive species or not) been relocated from work areas? If yes, describe below.		X	
Have impacts occurred on adjacent habitat (sensitive or not sensitive)? If yes, describe below.		X	
Did you observe any threatened or endangered species? If yes, describe below.		X	
Have there been any work stoppages for biological resources? If yes, describe below.		X	
Cultural and Paleontological Resources	Yes	No	N/A
Are appropriate buffers/exclusion zones for identified sensitive cultural/paleo resources (e.g., cultural sites) clearly marked and being maintained?	X		
Is the project in compliance with cultural/archaeological monitoring requirements (e.g., if required, are monitors present)?	X		
Is the project in compliance with paleontological monitoring requirements (e.g., if required, are monitors present)?	X		
Have there been any work stoppages for potential archaeological, cultural, or paleontological resources? If yes, describe below.		X	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used onsite properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		

Are required fire prevention and control measures in place, and no crew members, managers, or monitors are smoking onsite?	X		
Are contaminated soils properly managed for onsite storage or off-site disposal?	X		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	X		
Is construction occurring within approved work hours?	X		
Are required noise control measures in place?	X		

<p>AREAS MONITORED Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.</p>
<p>DESCRIPTION OF OBSERVED ACTIVITIES 10:28 AM- I arrived at the Sanger Substation Expansion Project site. Conditions onsite were muddy (Photo 1), but I observed no mud trackout or off-site runoff (Photo 8) (APM GEO-2/APM WQ-1). I did not observe any active construction crews onsite (stand down due to muddy conditions). All construction vehicles were staged within the existing Sanger Substation site (Photo 2).</p> <p>10:35 AM- I began conducting a site inspection. I observed that the new retention basin was filled with rainwater (Photos 3 and 4). New fencing was installed south of the retention basin (Photo 4). I noted that repairs were made to the silt fencing surrounding the substation expansion footprint (Photos 5, 7, and 10); however, a few new areas contained sags and minor holes in the silt fence and required repair (Photos 6 and 9). Some holes that were previously repaired were opened again, due to recent storms (Photo 9). Generally, the fence appeared well-maintained.</p> <p>10:55 AM- I completed site inspection.</p> <p>11:00 AM- I left the project site.</p>
<p>MITIGATION MEASURES VERIFIED MM BIO-1, APM HAZ-3, MM HAZ-2, APM GHG-1, MM HAZ-1, APM GEO-2, APM WQ-1</p> <p>See additional applicant proposed measures (APMs) and mitigation measures (MMs) listed in the Description of Observed Activities section.</p>
<p>RECOMMENDED FOLLOW-UP Silt fence needs to be repaired in several locations to address sags and minor holes. Inspect silt fence during next visit.</p>

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS

COMPLIANCE SUMMARY Below please describe any Compliance Incidents (Level 1, 2, or 3) that have occurred since your last visit. If you observe a compliance issue in the field, please note this on this monitoring form. In addition, Level 1, 2, or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.

- Level 0 Acceptable.** *(no compliance incidents)*
- Level 1: Minor Problem.** An event or observation that slightly deviates from project requirements, but does not put a resource at unpermitted risk. If you checked this box, describe the incident below and fill out a separate Compliance Incident Form.
- Level 2: Compliance Deviation.** An event or observation that deviates from project requirements and puts a resource at risk, or shows a trend toward placing resources at risk, but is corrected without affecting the resource. Repeated Level 1 Minor Problems left unaddressed may also rise to a Level 2 Compliance Deviation. If box is checked, summarize below and fill out a separate Compliance Incident Form.
- Level 3: Non-Compliance.** An event or observation that violates project requirements and affects a resource. Repeated Level 2 Compliance Deviations left unaddressed may also rise to a Level 3 Incident. An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) APMs or MMs, permit conditions, or approval requirements (e.g., minor project changes, NTP), and/or violates local, state, or federal law. If box is checked, summarize below and fill out a separate Compliance Incident Form.

Compliance Incidents reported by PG&E’s Compliance Team

- PG&E’s Compliance Team reported Compliance Incidents since last CPUC Compliance Monitor visit. If boxed checked, describe issues and resolution status below.

Description: *(include PG&E’s report number)*

New Sensitive Resources




- New biological, environmental, cultural/archaeological, or paleontological discovery requiring compliance with mitigation measures, permit conditions, etc., has occurred since last CPUC Compliance Monitoring visit. If checked, please describe the new discoveries and documentation/verification below.

Description:




Date	Level	Compliance Incident and Resolution	Relevant Mitigation Measure	Corresponding Level 1, 2, or 3 Report #

PREVIOUS COMPLIANCE INCIDENTS OR ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

Sags and rips in portions of the silt fence were repaired since the last visit. However, some areas have opened again, and new holes and sagging has occurred in different areas due to recent storms. The silt fencing will require additional maintenance to ensure continued compliance.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
02/14/19	Temporary laydown/staging area		Photo 1- Muddy and saturated conditions at the laydown area. Photo facing west.
02/14/19	Existing substation		Photo 2- Parked vehicles inside the existing substation were turned off when not in use. Photo facing southeast.
02/14/19	Retention basin		Photo 3- Completely full retention basin. Photo facing west.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
02/14/19	Retention basin		Photo 4- New fencing installed immediately south of the retention basin. Photo facing southwest.
02/14/19	Expansion footprint		Photo 5- Silt fence held together with zip ties on western edge of the expansion footprint. Photo facing west.
02/14/19	Expansion footprint		Photo 6- Sagging silt fence on western edge of expansion footprint. Photo facing northwest.
02/14/19	Expansion footprint		Photo 7- The silt fencing adjacent to the water tower was repaired since the previous site visit. Photo facing north.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
02/14/19	Expansion footprint		Photo 8- Overall, the substation expansion footprint appears to be well maintained. Photo facing south.
02/14/19	Expansion footprint		Photo 9- A recent silt fence repair that reopened, likely during the recent storm events. Photo facing south.
02/14/19	Expansion footprint		Photo 10- Tape repair on silt fence along the eastern edge of the substation expansion footprint. Photo facing north.

Completed by:	Ben Arax
Firm:	Soar Environmental Consulting, Inc.
Date:	02/14/19
Reviewed by:	Danielle Gutierrez
Firm:	Soar Environmental Consulting, Inc.
Date:	02/14/19



Sanger Substation Expansion Project CPUC Compliance Monitoring Report

Project Proponent	Pacific Gas & Electric (PG&E)	Report No.	CM-CPUCBA-022619
Lead Agency	California Public Utilities Commission (CPUC)	Date (mm/dd/yy)	02/26/19
CPUC Project Manager	Michael Rosauer	Monitor(s)	Ben Arax
CPUC (Ecology and Environment, Inc., member of WSP [E & E]) Monitoring Manager	Ilja Nieuwenhuizen	AM/PM Weather	66° F, Cloudy, Wind 7 miles per hour (mph)
CPUC (E & E) Monitoring Supervisor	Aileen Cole	Start/End Time	12:50 PM – 1:48 PM
Project Notices to Proceed NTP(s)	NTP #1		

SITE INSPECTION CHECKLIST *(Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)*

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all onsite personnel (e.g., construction workers, managers, inspectors, monitors)?	X		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (best management practices [BMPs]) been installed in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP)?	X		
Are erosion and sediment control measures (BMPs) installed correctly (without apparent deficiencies) and functioning as intended during rain events?	X		
Are measures in place to avoid/minimize mud tracking onto public roadways?	X		
Is dust control being implemented, in accordance with the Dust Control Plan (e.g., access roads watered, haul trucks covered, dirt piles are covered with tarps, pull-outs and streets cleaned on a regular basis)?	X		
Are work areas being effectively watered prior to excavation or grading?	X		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	X		
Equipment	Yes	No	N/A
Are vehicles maintaining speed limits: 15 mph on unpaved roads/10 mph off-road?	X		
Are observed vehicles/equipment arriving onsite clean of sediment/mud and noxious weeds or other plant debris?	X		

Are observed vehicles/equipment turned off when not in use?	X		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	X		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources, as appropriate?	X		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	X		
Are trenches/excavations covered at night, or when not possible, are wildlife escape ramps installed, constructed of earth fill or wooden planks no less than 10 inches wide?	X		
Biology	Yes	No	N/A
Have required preconstruction surveys been completed for biological resources (special status species, raptors and other nesting birds, burrowing owls, San Joaquin kit fox), as appropriate?	X		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, appropriate buffer distance enacted)?	X		
Is project complying with biological monitoring requirements (e.g., if required, are monitors present)?	X		
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features (e.g., is the refueling/maintenance buffer in place within 100 feet of the irrigation ditch)?	X		
Has wildlife (sensitive species or not) been relocated from work areas? If yes, describe below.		X	
Have impacts occurred on adjacent habitat (sensitive or not sensitive)? If yes, describe below.		X	
Did you observe any threatened or endangered species? If yes, describe below.		X	
Have there been any work stoppages for biological resources? If yes, describe below.		X	
Cultural and Paleontological Resources	Yes	No	N/A
Are appropriate buffers/exclusion zones for identified sensitive cultural/paleo resources (e.g., cultural sites) clearly marked and being maintained?	X		
Is the project in compliance with cultural/archaeological monitoring requirements (e.g., if required, are monitors present)?	X		
Is the project in compliance with paleontological monitoring requirements (e.g., if required, are monitors present)?	X		
Have there been any work stoppages for potential archaeological, cultural, or paleontological resources? If yes, describe below.		X	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used onsite properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		

Are required fire prevention and control measures in place, and no crew members, managers, or monitors are smoking onsite?	X		
Are contaminated soils properly managed for onsite storage or off-site disposal?	X		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	X		
Is construction occurring within approved work hours?	X		
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<p>AREAS MONITORED Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.</p>
<p>DESCRIPTION OF OBSERVED ACTIVITIES 12:50 PM- I arrived onsite. Conditions remained slightly muddy, but overall, the site was drier than during previous visits.</p> <p>12:55- I began site inspection. I observed multiple trenches that had been appropriately demarcated (Photo 1). AJ Excavation crews were wetting and compacting soil, and installing a temporary fence (Photos 2 and 4). I inspected erosion control BMPs on the eastern side of the expansion footprint (Photo 3) (APM GEO-2/WQ-1). The silt fencing remained in good condition (Photo 5) and was repaired. I observed a water truck filling at the water tank in the northwestern corner of the substation expansion footprint (Photo 6); the truck sprayed the soil (Photo 7) in compliance with fugitive dust mitigation requirements (APM AIR-1). The new retention basin remained filled with water from recent storm events (Photo 8), but was still functioning as intended (APM HAZ-1).</p> <p>1:13 PM- I completed the site inspection. No compliance issues were observed.</p> <p>1:46 PM- I met with Jeff Clarkson (PG&E Civil Inspector) after a project meeting, and reviewed the up-to-date SWPPP storm reports from the last several rain events.</p> <p>1:48 PM- I left the project site.</p>
<p>MITIGATION MEASURES VERIFIED MM BIO-1, APM AIR-1, APM HAZ-3, MM HAZ-2, APM GHG-1, MM HAZ-1, APM GEO-2, APM WQ-1</p> <p>See additional applicant proposed measures (APMs) and mitigation measures MMs listed in the Description of Observed Activities section.</p>
<p>RECOMMENDED FOLLOW-UP None</p>

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS

COMPLIANCE SUMMARY Below please describe any Compliance Incidents (Level 1, 2, or 3) that have occurred since your last visit. If you observe a compliance issue in the field, please note this on this monitoring form. In addition, Level 1, 2 or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.

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New Sensitive Resources

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Description:

Date	Level	Compliance Incident and Resolution	Relevant Mitigation Measure	Corresponding Level 1, 2, or 3 Report #

PREVIOUS COMPLIANCE INCIDENTS OR ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

Silt fence sagas and minor holes were repaired. No further actions are necessary.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
02/26/19	Expansion footprint		Photo 1- Trenches were dug out for further construction. Photo facing east.
02/26/19	Expansion footprint		Photo 2- Crews loaded fencing into a truck bed for installation. Photo facing northeast.
02/26/19	Expansion footprint		Photo 3- Soil piles were adequately covered to prevent erosion. Photo facing north.
02/26/19	Expansion footprint		Photo 4- Newly installed temporary fence. Photo facing east.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
02/26/19	Expansion footprint		Photo 5- The silt fence is intact and working as intended. Photo facing east.
02/26/19	Expansion footprint		Photo 6- Water truck refilling to mitigate dust. Photo facing west.
02/26/19	Expansion footprint		Photo 7- Water truck spraying soil. Photo facing east.
02/26/19	Retention basin		Photo 8- The retention basin was full; however, it was working as intended. Photo facing south.

Completed by:	Ben Arax
Firm:	Soar Environmental Consulting, Inc.
Date:	02/26/19
Reviewed by:	Danielle Gutierrez
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