



Aspen *Environmental Group*

PROJECT MEMORANDUM PG&E – TRI-VALLEY 2002 CAPACITY INCREASE PROJECT

To: Jensen Uchida, CPUC
From: Vida Strong, Aspen Project Manager
Date: November 2, 2005
Subject: Weekly Report #82: October 23, 2005 – October 29, 2005
CPUC Environmental Monitor (EM): Christopher Meyer

Current construction of the PG&E Tri-Valley Project includes the Phase Three portion of the project, including construction of the overhead transmission line, underground alignment, North Dublin Substation, and Transition Station; all roadway and vault pad grading; and preparation of the 0.33-acre and 0.94-acre mitigation areas. Opus Environmental is providing the Environmental Inspectors for PG&E (PG&E EIs). Opus is providing environmental, as well as biological monitoring and oversight, including conducting environmental training of all new crew personnel. Road improvement and installation is being conducted by Granite Construction. The tower work is being conducted by PG&E. The underground construction is being engineered by Wilson Construction and is being completed by Ranger Construction. The substation work is being engineered by Black and Veatch who has subcontracted construction to Granite Construction.

Summary of Phase Three Activity:

Weather was variable throughout the subject week with light rain in the afternoon of Wednesday, October 26th. During the subject week, the PG&E EIs conducted environmental trainings as new crew members joined the project.

The CPUC Lead EM monitored construction on October 26th, 27th and 28th.

Vault installation and tie-ins continued on the underground sections. Crews worked on preparing the forms for the concrete rings on Vault 6. Crews at this location also worked on compacting the right-of-way following backfill on the trench west of Vault 6. The trench east of Vault 6 needed additional concrete over the communication conduit prior to backfilling. Topsoil is being placed over the right-of-way after backfilling is completed. Crews are continuing restoration activities, including placement of erosion prevention and sediment control devices; however, resident pasturing cows have begun to dismantle and eat the wattle rolls. Solutions to this problem are being investigated, including working with landowners to install fencing around the restored areas. Crews also continued conduit proofing and clean out of the vaults north of the Cayetano Substation.

Trenching through Cayetano Creek, which parallels Road 5, has been completed and backfill was completed during the prior week. California red-legged frogs (CRLF) were identified in the project right-of-way and surrounding areas of the creek. An approved biologist was at the location monitoring for frogs preceding and during construction. The temporary culvert through this area must be removed prior to October 31st, as required by the CDFG Streambed Alteration Agreement. As of October 28th, the crossing was still in place (see Figure 1). Silt fencing was installed at the approved crossing of the creek at the beginning of Road 6. The contractor removed excess spoils above the culvert and material that had fallen into the culvert from the road slope.

Granite Construction continued grading and compaction activities along Access Road 6 during the subject week. The area appeared to be watered frequently to cut down on construction related dust. At the Transition Station, Ranger Construction continues vault installation activities.

Sediment control devices were installed around the new culvert installations on Moller Road (see Figure 2). The CPUC Lead EM expressed concerns that problems such as the lack of proper installation of the straw bales could lead to failure of the devices and possibly lead to plugging the culverts. The concerns expressed by the CPUC EM previously that existing wetland areas adjacent to the roads could be impacted by the new drain features are being addressed by PG&E and the RWQCB. PG&E and a RWQCB hydrologist have a meeting scheduled for this week to address the issue.

Granite Construction worked with a backhoe to remove the access road across the creek to the mitigation pond site. The material was carefully removed from above the fabric placed above the natural drainage. The spoils removed from the crossing were placed on the section of the abandoned road to the mitigation pond directly above the Congdon's tarplant. The CPUC Lead EM expressed concern that the material could be transported downslope during winter rains and impact both the Congdon's tarplant population and the red legged frog habitat. A PG&E EI was present during all the work in the area in order to avoid any impact to the Congdon's tarplant. At least two populations of the rare plant were identified adjacent to the mitigation pond site and these areas were fenced off with orange fence for avoidance. In addition, the CPUC Lead EM noted that the hydroseeding and straw placed on the disturbed margin on the mitigation pond does not address storm water run off entering the mitigation area from the adjacent hillside.

A crew hydroseeded and spread straw over the straw wattles on the slopes along Moller Ranch Road (see Figure 3). The crews used a hose to spread the straw on the upper sections of the slope and spread the straw directly from the unit on the lower portions of the slope. No installation of a bonding agent was noted during the site visit.

Grading activities continued at the new substation site during the week.

The PG&E tower crews installed four towers on October 25th using a sky crane helicopter. The crews worked to install additional bracing on the four towers during the site visit. Two towers required rotation of the upper section of the towers and this was completed during the site visit.

The primary focus on the site visit by the CPUC Lead EM was compliance with the Storm Water Pollution Prevention Plan and the installation of Best Management Practices (BMPs) on the project. The PG&E contractors worked in the final days of October to complete several activities prior to October 31st, as required by the CDFG Streambed Alteration Agreement. The CPUC Lead EM discussed many concerns related to the installation of BMPs on the project with the PG&E EIs. The greatest concerns are related to the sections of right-of-way above Cayetano Creek completed by Ranger Construction. The long and steep slope lacked any means to move water off the right-of-way (see Figure 4). Any water entering at the top of the slope would eventually hit the base of the disturbed slope, potentially transporting sediment into the sensitive resource. Straw wattles are usually not a recommended BMP for a slope of this nature and waterbars are generally used to take water off the right-of-way. Silt fencing in the Moller Ranch area was installed too tightly in several places, severely reducing the ability of the BMP to trap sediment and allow screened water to pass through the fence. In addition, the silt fencing was not placed perpendicular to the slope in several locations, outletting any sediment-laden water either at minor drainages or low areas of the fencing (see Figure 5). The CPUC Lead EM strongly recommended that a BMP specialist review all SWPPP issues on the project prior to any additional rainfall and that the issues discussed during the site visit be addressed promptly. The CPUC EM will continue to monitor and document the effectiveness of installed sediment control devices, and document compliance accordingly.

ENVIRONMENTAL COMPLIANCE:

The CPUC EM observed that with the exception of two off right-of-way incidents, all Phase Three construction activities were in compliance with mitigation measures adopted in the EIR and other permit requirements. Both a water truck and a Utility Vault truck were observed driving off the right-of-way by the CPUC Lead EM during the site visit. The PG&E EI addressed the issue with the contractor.

The PG&E EI issued a Non-Compliance due to the lack of response by the contractor on placing erosion prevention devices on or around a spoil pile adjacent to Cayetano Creek.

The PG&E EI at Moller Ranch observed at burrowing owl south of the Dublin Substation site and initiated the process of contacting the resource agencies. The burrow was identified and exclusion fencing and signs were placed on the access road and work space that were within 160 feet of the burrow (see Figure 6). PG&E is coordinating with representatives from the resource agencies on mitigation to allow work to continue in the area. The burrow appears to have been established after the current work started in the area.

Three Non-Compliance Reports (NCRs) and two Project Memoranda (PMs) have been issued for the Phase Three portion of the project as of October 31, 2005 (see Table 1).

TABLE 1
ENVIRONMENTAL COMPLIANCE STATUS
(Updated 10-31-05)

Project Memo or NCR	Date Issued	Description	Follow-Up Activities
PHASE THREE			
Project Memorandum	7/20/05	Crews have installed exclusion fencing as well as sediment fencing in areas with potential for spoils to slide in to sensitive areas. Numerous gaps were left in the fencing to allow moving cows. However, no exclusion signs have been installed in the gaps after repeated requests. In addition, the CTS exclusion zone was toured and no sensitive resource or exclusion signs to notify crews of the resource have been installed. Notifications were made to the PG&E EI. On July 14, an operator was not aware of the 500-foot CTS exclusion zone and a 400-foot by 20-foot area was scraped within the zone coming within 100 feet of the CTS burrow. The site Foreman when he realized what was occurring immediately stopped the operator. Opus notified Mary Hammer of the USFWS in an e-mail.	
NCR	7/26/05	A drainage off Manning Road was bridged by steel plates and the area extending upslope from the bridge had been graded up to and possibly within the drainage without an approved CDFG Streambed Alteration Agreement.	CDFG notification required
NCR	7/26/05	Construction at Pole location 9, 10, 11, and 12 and use of associated access roads were started prior to the CPUC EM verifying that proper flagging and exclusion fencing had been installed as required by Project mitigation measures. Directly upslope of a CTS/CRLF breeding pond burrow clusters were not fenced off and the site was left unmonitored though construction was occurring within 200 feet of the pond. Crews were using new routes which were not previously surveyed or approved.	PG&E must properly flag and fence the work and access areas, and provide maps and survey results. Burrow clusters must be fenced for exclusion.
NCR	7/29/05	Crews graded the other side of the drainage referred to in an NCR issued 7/26/05. Note that a CDFG Streambed Alteration Agreement has not been issued for the site.	CDFG notification required
Project Memorandum	8/21/05	Crews placed a dumpster outside of the project area and did not move it for three days.	Dumpster was removed 8/19/05

NOTICES TO PROCEED (NTP):

Table 2 presents the NTPs issued by the CPUC for the Tri-Valley Project to date. No additional NTPs are anticipated.

**TABLE 2
NOTICES TO PROCEED**
(Updated 10/29/05)

NTP #	Date Issued	Description
#1	September 12, 2002	Phase One: Construction on of six different sections of the underground portion of the Vineyard Segment, within the City of Pleasanton, City of Livermore, and unincorporated Alameda County.
#2	October 10, 2002	Phase One: Construction of six additional sections of the underground portion of the Vineyard Segment, within the Cities of Pleasanton, Livermore, and unincorporated Alameda County
#3	December 12, 2002	Phase One: Construct the final sections of the Phase One portion Tri-Valley 2002 Capacity Increase Project, within the City of Pleasanton.
#4	May 5, 2003	Phase Two: Construction of the new 5-acre Cayetano Substation located at the intersection of North Livermore Avenue and May School Road.
#5	July 14, 2003	Phase Two: Construction of 2.3 miles of underground transmission line installation extending from the Cayetano Substation to the North Livermore Transition Station to be constructed at the Contra Costa–Newark Transmission Line Corridor
UAD NTP		Phase Two: Allow construction within the exclusion boundary of the May School road cultural resource discovery area.
#6	June 29, 2005	Phase Three: Construction of the overhead transmission line, the transition station, all roadway and vault pad grading, and preparation of 0.33-acre mitigation area.
#7	August 4, 2005	Phase Three: Underground construction and preparation of the 0.94-acre mitigation area.
#8	August 18, 2005	Phase Three: North Dublin Substation.

VARIANCE REQUESTS:

No Variance Requests were submitted for review during the subject week. Table 3 presents the Phase Three Variance Requests reviewed to date.

TABLE 3
VARIANCE REQUEST STATUS
(Updated 11/02/05)

Variance Request #	Date Submitted	Description	Status	CPUC Approval Date
PHASE THREE				
11	7/7/05	Variance to allow travel through home-stead archaeological site C-Livermore-1H.	Completed	7/8/05
12	7/15/05	Variance to allow the use of staging areas as outlined in road plan drawings along the Phase 3 alignment.	Completed	7/26/05
13	7/29/05	Variance to use three staging areas. Two are located along the Moller Ranch Road. The last is located adjacent to the Cayetano Substation.	Incorporated into NTP #7	
14	8/12/05	Variance to use three access roads, and a laydown area.	Completed	8/19/05
15	8/19/05	Variance to use two laydown areas and one access road near road 6.	Completed	8/26/05
16	9/15/05	Variance for use of a temporary overland access connector route to access two vault installation sites	Completed	9/19/05
17	10/25/05	Variance for installation of guard structures at Collier Canyon Road and grading a work space for a boom truck near the Dublin Substation.	Under Review	Pending

AGENCY PERSONNEL CONTACTS:

On October 28, Michelle Barlow notified Brian Wines that a response to the potential impacts to the wetlands identified in the CPUC's Weekly Report #80 and Mr. Wines' October 20th email would be delayed, since the meeting with PG&E, PG&E's engineers and hydrologists was rescheduled to October 27th. As a result, PG&E would not be submitting the results of the meeting to Mr. Wines on October 28th. As noted above, PG&E and Mr. Wines have a meeting scheduled for this week to address the issue.

On October 28, Brian Wines, RWQCB, contacted Aspen regarding concerns on wattle installation and cattle interference. Michelle Barlow, Opus Environmental, responded to the concerns on October 31.

Photographs



Figure 1 – Crossing of Cayetano Creek was in place on October 28th.



Figure 2 – Straw bales upstream of culvert installation along Moller Ranch Road.



Figure 3 – Crew spreading straw over slopes after hydroseeding along Moller Ranch Road.



Figure 4 – Long slope over Cayetano Creek lacks adequate BMPs to address erosion prevention and sediment control.



Figure 5 – The silt fencing in several locations was installed either too tightly or at an angle allowing water and sediment to flow along the silt fencing towards resources.



Figure 6 – Exclusion tape and signs were placed on a section of Moller Ranch Road within 160 feet of the burrowing owl burrow discovered on October 27th.