

	<p><b>California Public Utilities Commission</b>  <b><i>Mitigation Monitoring, Compliance, and Reporting Program</i></b></p>
	<p><b>Tie Line (TL) 637 Wood-to-Steel Pole Replacement Project</b></p>
	<p><b>Compliance Status Report: 003</b>   <b>March 30, 2014</b></p>

**SUMMARY**

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Mitigated Negative Declaration (MND) for the TL 637 Wood-to-Steel Pole Replacement 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 MND to mitigate or avoid impacts are implemented in the field. This MMCRP status report is intended to provide a description of construction activities on 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 March 17 through 30, 2014.

**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 mitigation measures were reviewed in the field.

***Implementation Actions***

Staging Yards

Delivery of materials for pole replacement and Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) was observed throughout the reporting period (see Photo 1—Attachment A). Installation of perimeter fencing, gravel base, opaque green mesh screening material, straw wattles and rock aprons occurred at the Warnock, Creelman, and Santa Ysabel Staging Yards.

### Micro pile Pole Replacement Sites

Crews were observed conducting the following activities associated with micro pile sites: setting up and demobilizing equipment at pole locations (see Photo 2—Attachment A), grouting operations (see Photo 3—Attachment A), vegetation trimming at sites and along access roads, wire spreading, capping micro pile foundations and compacting spoils on existing access roads.

### Conventional Pole Drill Sites

Crews were observed conducting the following activities associated with conventional pole replacement sites: machine auguring pole holes (see Photo 4—Attachment A), hand digging pole holes (see Photo 5—Attachment A), installation of BMPs, vegetation trimming, and refreshing access roads to pole sites.

Crews were also observed installing nest preventative material (filler foam) into cavities in a wooden pole at Location 156. A biological monitor was present during these activities in accordance with Mitigation Measure (MM) BIO-2.

### ***Mitigation Implementation***

#### Staging Yards

Crews were observed finalizing opaque green mesh for visual screening purposes in accordance with Applicant Proposed Measure (APM) AES-1 at the Santa Ysabel Staging Yard. SWPPP BMPs (APM HYD-1) including straw wattles were observed being maintained at all Staging Yards and track-out was not observed at points of ingress/egress. Portable equipment and temporary structures were observed staged on secondary containment as required by the project SWPPP.

#### Wood Pole Replacement

During wood pole replacement activities, CPUC third-party monitors observed biological, archaeological, and aquatic monitoring as required under MMs BIO-2, MM CUL-1, and MM HYD-4. In accordance with MM BIO-4, prior to activities commencing at work sites, CPUC-approved biological monitors conducted nesting bird surveys and staked buffers around active nest areas for avoidance. Nest buffers were delineated with wooden stakes that were painted green and had the words “do not enter without bio.” CPUC-approved biological monitors were also observed sweeping for nests immediately prior to work occurring in areas (see Photo 6—Attachment A) and monitored buffer zones to ensure full avoidance by crews.

In order to minimize fire risk during pole replacement activities or BMP installation, vegetation trimming was scheduled and was observed being conducted by crews. In accordance with the project Fire Plan (APM HAZ-2), CPUC third-party monitors observed crews carrying backpack water pumps and serving as immediate fire watch during vegetation trimming (such as weed whacking). Water tenders were observed adjacent to these activities and during other site work, such as constructing micro

pile foundations (see Photo 7—Attachment A). Other equipment such as backpack pumps, fire extinguishers, and shovels were observed mounted on vehicles and/or available at each work site.

In accordance with the project SWPPP and APM-HYD-1, erosion control BMPs such as silt fencing were observed being maintained at all sites (see Photo 5—Attachment A), and water bars were observed along the access road to appropriately divert running water. In accordance with the RWQCB Clean Water Act Section 401 Certification and MM-HYD-4, an aquatic resource monitor was observed stationed at designated work location sites that were adjacent to jurisdictional waterways. Crews were observed staging equipment on visqueen to ensure containment of any potential mechanical leaks. On March 28, a small leak/spill was observed by a CPUC third-party monitor following the completion of a micro pile drill at location 59 and was reported to the Lead Environmental Inspector (LEI), who communicated the issue at the following morning tailboard. The leak was reported to be cleaned by crews in the weekly report.

In accordance with MM NOI-2, CPUC third-party monitors continued to observe noise monitoring at work sites. Noise meters were observed stationed adjacent to work sites behind installed noise barriers, recording noise levels behind the barriers and along the property line of adjacent residences (see Photo 8—Attachment A).

In accordance with MM CUL-3, crews were observed avoiding Environmentally Sensitive Areas (ESAs), which were delineated and crews were observed staying within the approved work areas.

### ***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 MND for the Tie-Line 637 Wood-to-Steel Pole Replacement Project, as adopted by the CPUC on February 5, 2014 (Decision D.14-02-04).

### ***Compliance Status***

CPUC third-party monitors observed overall compliance with mitigation measures throughout the reporting period. Observations that had potential to become an area of concern if left uncorrected were addressed to the LEI on site by the CPUC third-party monitor. An example of this occurred on March 21, when a third-party monitor observed track-out on pavement adjacent from a pole location work site from equipment being taken off-site and loaded onto a flatbed truck for transfer. The issue was noted to the LEI, who communicated the location and need for clean up by end of day to the crews responsible for road clean-up.

Two Level 1 Minor Deviations were reported by SDG&E during this reporting period. On March 22, a work crew was identified staging equipment and materials in a disturbed open area (approximately 3,500 sq ft; 90% bareground, 10% non-native vegetation), south of Stringing Site no. 6, bounded by

Gymkhana Road, Structure No. D46 access road, and Stringing Site No. 6. The crew was informed that the area was not an approved staging area and to discontinue use. The stringing site perimeter was subsequently delineated for the crews to utilize this area for construction.

On March 24, a work crew was observed inadvertently parking in disturbed coastal sage scrub habitat near Structure No. P29. SDG&E monitors clarified with the crew which routes were authorized for project use and the vehicle was moved to an area that allowed parking of equipment. Additional communication at construction meetings as well as at daily morning tailboard meetings to further facilitate awareness and compliance will occur.

As a follow-up to the recently reported Level 1 deviations, a meeting was held on March 27 between CPUC, Dudek and SDG&E to discuss existing measures being implemented in the field and future actions that could be taken to prevent deviations from occurring. Additionally, clarification was provided by CPUC and Dudek regarding protocols identified in the MMCRP, including reporting protocols and foreseeable project actions that could warrant submittal of a Minor Project Refinement.

## **CONSTRUCTION PROGRESS**

### Staging Yards

Staging Yards are approximately 90 percent complete.

### Wood Pole Replacement

Approximately 13 percent of micro-pile foundations drilling and grouting have been completed.

Capping and testing is 5 percent complete.

Approximately 31 percent of hole excavations (for directly embedded poles) have been completed.

### Best Management Practices

Approximately 50 percent of SWPPP BMPs have been installed along the project right-of-way.

## **CONSTRUCTION SCHEDULE**

***Tie-Line 637 Wood-to-Steel Pole Replacement Project (CPUC NTP No. 001)*** – SDG&E began clearing activities at the project site on February 19, 2014. All project activities are scheduled to be completed by September 2014.

## ATTACHMENT A Photos

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**Photo 1:** Staging Yards have been established and visual mitigation (opaque green mesh) and SWPPP mitigation (straw wattles, rock aprons, and gravel base) were observed installed. Deliveries for pole installation were observed at the staging yards.



## ATTACHMENT A (Continued)



**Photo 2:** Crews were observed setting up equipment for micro pile foundation installation. Silt fencing was observed in the work area in accordance with the project SWPPP.

## ATTACHMENT A (Continued)



**Photo 3:** Crews were observed staging grouting equipment for micro pile foundations within approved work areas.



## ATTACHMENT A (Continued)



**Photo 4:** Crews were observed using approved access roads to mobilize conventional drilling equipment.



## ATTACHMENT A (Continued)



**Photo 5:** Crews were observed hand-digging pole sites within installed silt fencing required by the SWPPP.

## ATTACHMENT A (Continued)

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**Photo 6:** CPUC-approved biological monitors were observed conducting nesting bird surveys in accordance MM BIO-4 and conducting additional clearance sweeps prior to initiating ground work at pole locations.



## ATTACHMENT A (Continued)



**Photo 7:** Fire Watch/water tenders were observed adjacent to vegetation trimming activities and construction activity in accordance with the project Fire Plan and APM HAZ-2.

## ATTACHMENT A (Continued)



**Photo 8:** Noise Monitoring Equipment and sound walls were observed in place adjacent to micro pile drilling activities to ensure that noise levels during construction activities did not exceed thresholds at the nearest property line or adjacent to noise sensitive areas in accordance with MM NOI-2.



## ATTACHMENT B Notices to Proceed

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NTP No.	Date Issued	Description	Conditions Included (Y/N)
CPUC - 001	February 14, 2014	Construction of the Tie Line 637 Wood-to-Steel Pole Replacement Project	Y

## ATTACHMENT C

### Minor Project Refinement Request

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Minor Project Refinement Request No.	Submitted	Description	Status	Approval
N/A	N/A	N/A	N/A	N/A