

	<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: 005</b>   <b>April 27, 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 April 14 through April 27, 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 and staging of steel poles and construction material continued at the Warnock and Santa Ysabel Staging Yards during this reporting period (see Photo 1 – Attachment A).

Micropile Drill Sites

At micropile drill sites, construction crews were observed setting up and demobilizing equipment at pole locations, drilling micropile foundation holes (see Photo 2 – Attachment A), installing rebar, grouting, and strength testing micropiles.

### Conventional Drill Sites

At conventional drill sites, construction crews were observed machine auguring, air track drilling, and hand digging pole holes (see Photo 3 – Attachment A).

### Access Roads, Best Management Practices (BMPs), and Other Activities

Construction crews were observed spreading wire and preparing to set steel poles (see Photo 4 – Attachment A), trimming vegetation along access roads and at pole replacement work sites (see Photo 5 – Attachment A), installing and/or maintaining erosion control and stockpile management BMPs (i.e. silt fencing, straw wattles, visqueen coverings, etc.) at pole replacement work sites (see Photo 5 – Attachment A), and refreshing access roads (see Photo 6 – Attachment A).

### ***Mitigation Implementation***

#### Wood Pole Replacement

During wood pole replacement activities, CPUC third-party monitors observed biological monitors working with construction crews to minimize or prevent impacts to biological resources in accordance with mitigation measure (MM) BIO-2. In accordance with MM-BIO-4, CPUC approved biologists were observed conducting pre-construction nesting bird surveys along access roads and at pole replacement work sites. Wooden stakes (painted green) were observed marking the locations of active nests along the project alignment for avoidance by construction personnel. In addition, location-specific nesting bird survey status was tracked by the Lead Environmental Inspector (LEI) and provided to biological monitors and construction management. Bird deterrents were observed at some pole replacement work sites, and netting was observed covering staged steel pole openings to prevent nesting within the poles. In accordance with MM-BIO-3, open holes and micropile foundations were covered to prevent wildlife entrapment (see Photo 8 – Attachment A), and in accordance with Applicant Proposed Measure (APM) BIO-1, work areas were free of trash and debris.

During this reporting period, archeological monitors were observed monitoring work activities near known sensitive cultural resources, and avoidance measures, such as the roping off of cultural Environmentally Sensitive Areas (ESA's), were implemented per APM CUL-3 and MM CUL-1.

Fire risk was observed being minimized during project construction through implementation of measures in the Project Fire Plan (APM HAZ-2). Water tenders were observed near work sites (approximately two minutes travel time) where energized equipment was being used in wire spreading or pole installation activities, and were also observed being utilized during road refreshing activities. Maintenance crews were observed mowing and trimming vegetation that while carrying the required fire safety equipment (i.e. fire extinguisher, backpack pump, shovel, and Pulaski) (see Photo 5 – Attachment A), and trailing a water buffalo when required. Fire safety equipment was observed at both micropile and conventional drill sites, and fire extinguishers or a backpack pack and shovel were observed

mounted on or next to staged internal combustion engines and generators (see Photo 2 – Attachment A). Assigned ‘Fire Patrols’ were also observed along the project throughout the reporting period.

As described in the SWPPP required by APM HYD-1, new erosion control BMPs such as silt fencing and straw wattles were observed being installed at pole replacement work sites prior to pole hole drilling (see Photo 5 – Attachment A). Previously installed erosion control and stockpile management BMPs, including water bars along access roads (see Photo 6 – Attachment A), silt fencing (see Photo 2 – Attachment A), straw wattles, and visqueen stockpile covers, were observed being maintained. Third-party monitors inspected public roadways for construction related dirt/mud trac-out, and ensured trac-out control BMPs such as rattle plates and rock aprons were in good condition. In accordance with MM HYD-4 and the Clean Water Act Section 401 Certification, an aquatic resource monitor was observed monitoring construction activity near adjacent waterways helping to prevent or minimize impacts to jurisdictional features.

Construction crews were observed carrying spill kits, and staging equipment over visqueen sheets to prevent leaks and spills from being discharged into the soil per the requirements in MM HAZ-2 (see Photo 4 – Attachment A).

Noise barriers were observed being utilized during pole hole drilling to reduce noise at adjacent residences (see Photo 3 – Attachment A). A noise meter was also utilized by the LEI to record noise levels and to ensure they did not exceed limits allowable in mitigation (MM-NOI-2).

Due to high winds during this reporting period, areas of visual screening opaque mesh installed along the Santa Ysabel staging yard perimeter fence (APM-AES-1) were observed in need of repair. The issue/concern was communicated by the CPUC environmental monitor to the LEI and construction crews were subsequently observed repairing the opaque mesh. Visual screening around the Warnock Staging Yard remained intact during the reporting period (see Photo 1 – Attachment A).

During work along Creelman Lane, construction crews utilized signage, cones, and flaggers to direct traffic around construction areas safely in accordance with APM-TRA-1.

With the exception of the minor deviation reported below, crews were observed adhering to requirements to stay within approved access roads to pole location sites. Third-party monitors observed further delineation of approved work areas and access road limits to ensure crews were aware of authorized spaces and travel routes (see Photo 7 – Attachment A). Additionally, signs stating “NO PROJECT ACCESS” were observed posted on existing roads that could be mistaken for approved project access roads.

### ***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. All 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. On April 14, the LEI was notified of silt fencing in need of repair at Structure No. P84, and on April 21, the SWPPP monitor (and LEI) were notified of silt fencing over weighted with dirt spoil at Structure No. P8. On April 23, the LEI was notified of some concrete rubble observed on the main access road near Structure No. 56, and was asked to confirm that the nesting bird survey status was current at Structure No. P56, as work at that location had been omitted from the daily schedule, in which nesting bird survey status is displayed.

A Level 1 Minor Deviation was reported by SDG&E during this reporting period. On April 23, a project-related skip loader was parked in bare ground on an existing access road, not approved for project use, located adjacent to the approved project access road and the overland travel route to Structure Nos. P91. As corrective action, construction lead personnel were informed, no project access signage was installed in the area, and announcements were made at morning tailboards meetings to spread awareness among construction crews that only approved roads and parking areas may be utilized.

## **CONSTRUCTION PROGRESS**

### **Staging Yards**

Staging Yards are approximately 90 percent complete.

### **Wood Pole Replacement**

Approximately 36 percent of micro-pile foundations drilling and 30 percent grouting have been completed.

Capping and testing is 22 percent complete.

Approximately 42 percent of hole excavations (for directly embedded poles) have been completed.

Power line pole construction (setting bases) is 12 percent complete.

Temporary Pole Installation started on April 16, 2014 is 23 percent complete.

### **Best Management Practices**

Approximately 65 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:** Delivery of steel poles and construction materials continued during the reporting period (above, Warnock Staging Yard). In accordance with APM-AES-1, the opaque mesh used as visual screening remains intact around the perimeter of the yard.



## ATTACHMENT A (Continued)



**Photo 2:** In accordance with APM-HYD-1 and the Project SWPPP, silt fencing installed around work areas was observed in good condition and functional. In accordance with APM-HAZ-2 and the Project Fire Plan, fire safety equipment was staged on site and a fire extinguisher was mounted on the compressor.

## ATTACHMENT A (Continued)



**Photo 3:** In accordance with MM-NOI-2, a noise barrier was observed being implemented adjacent to sensitive receptors (above, Location 56) during pole hole hand digging. Silt fencing on site was observed in good condition and functional in accordance with APM-HYD-1 and the Project SWPPP.



## ATTACHMENT A (Continued)



**Photo 4:** Construction crews were observed installing steel poles (above, Location 32). In accordance with MM-HAZ-2, visqueen was observed beneath staged equipment to prevent leaks/spills from being discharged into the soil.

## ATTACHMENT A (Continued)



**Photo 5:** Construction crews were observed trimming vegetation at pole replacement work areas in accordance with APM-HAZ-2 and Project Fire Plan, and installing erosion control BMPs including silt fencing and/or straw wattles in accordance with APM-HYD-1 and the Project SWPPP (above, Location 97).



## ATTACHMENT A (Continued)

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**Photo 6:** Construction crews were observed refreshing the main access road and maintaining existing water bars in accordance with APM-HYD-1 and Project SWPPP.

## ATTACHMENT A (Continued)



**Photo 7:** Construction crews were observed staying within the project approved access, and limits were clearly delineated via signage and colored posts. An approved footpath to Location 106 (above) was marked using green-colored posts.



## ATTACHMENT A (Continued)



**Photo 8:** In accordance with MM-BIO-3, open holes and micropile foundations were covered to prevent wildlife entrapment.

## 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
001	4/9/14	Structure P5- Change from Micro Pile to Direct Bury	Approved	4/10/14
002	4/18/14	Overland Travel	Approved	4/23/14