

	<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: 006</p> <p>November 3, 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 October 18 through October 31, 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

The following summarizes CalPeco’s implementation of applicable APMs and MMs. In addition, CalPeco has submitted Weekly Compliance Reports, in accordance with the project’s MMCRP.

Scenic Resources:

All construction areas kept clean to the extent possible. Timber harvesting and cutting activities include chipping, mastication, and/or lop and scatter treatment, as appropriate and as agreed to with property owners included within the Timber Harvest Plan (THP). Log skidding trails that are no longer in use are re-graded as needed and are being rehabilitated as appropriate (i.e., seeding, mulching, wood chips).

Barriers, such as boulders and downed logs, are being placed as appropriate at access points no longer in use to discourage public access/use. Stumps were cut to meet the 6-inch maximum height requirement (APM-SCE-1).

Air Quality and Climate Change:

Water trucks were on-site to control fugitive dust (APM-AQ-2 and APM-AQ-4) and soil stockpiles were covered (APM-AQ-6). Monitors and all project personnel continue to ensure that traffic speeds are limited to 15 miles per hour or less on all unpaved roads and the project right-of-way (ROW). Signs stating that the speed limit is 15 miles per hour in these areas have been conspicuously placed along project access routes and the ROW (APM-AQ-7). Monitors and all project personnel continue to ensure that vehicle idling times are limited to a maximum of 5 minutes for vehicles and construction equipment, except where idling was required for the equipment to perform its task. No vehicles have been left unmanned and idling (APM-AQ-14).

Biological Resources:

Biological monitors were present during project construction activity (APM-BIO-1). Cut stumps were treated with borate compound (APM-BIO-4). In accordance with APM-BIO-5 (and APM-AQ-8), vehicles and equipment arrived at the project area clean and were inspected by the on-site monitors for mud or other signs that weed seeds or propagules could be present prior to use in the project area. Designated weed-cleaning stations were utilized to minimize the potential to spread noxious weeds (APM-BIO-6). Dens were flagged in accordance with APM-BIO-15. Pre-construction surveys to determine presence of active bat roosts were conducted in advance of timber harvest activities (APM BIO-20). Monitors with stop work authority were present with each vegetation removal crew to help ensure that impacts to biological resources were minimized (APM-BIO-21). Work activities were confined to approved and adequately delineated project areas (APM-BIO-26). Project work areas were kept free of trash/debris and no pets/firearms on project site (APM-BIO-33 and APM-BIO-34). Tree survey data provided to CPUC prior to tree removal activities (MM-4.7-4). Seed mixes being utilized on site for restoration have been approved by the USFS-LTBMU botanist. The Contractor obtained the approved seed in compliance with the project Habitat Restoration Plan, and completed restoration, seeding, and mulching disturbed areas is in compliance with the Habitat Restoration Plan (MM-4.7-5).

Heritage, Cultural, and Paleontological Resources:

Archaeological monitors were present where construction activity occurred near cultural resources areas (APM-CUL-1 and APM-CUL-8). As required by APM-CUL-1 and the Cultural Resources Protection, Monitoring and Unanticipated Discovery Plan, a cultural resources monitoring team has been present during project-related activities conducted within culturally sensitive areas.

Geology, Soils, Land Capability and Coverage:

Appropriate sediment control BMPs were in place, monitored, and maintained in accordance with the project's Stormwater Pollution Prevention Plan (SWPPP) and APM-SOILS-1.

Hazards and Hazardous Materials:

Fire suppression equipment was kept within 25 feet of chainsaw use areas, as required under APM-HAZ-5. Smoking occurred in designated areas (APM-HAZ-6).

Hydrology and Water Quality:

Refueling areas were identified with signs and located 100 feet from waterways (APM-WQ-1). Tree skidding did not occur through aquatic resources (WQ-4). BMPs installed to minimize rutting and sedimentation (APM-WQ-6).

Recreation:

Barriers, such as boulders and downed logs, have been placed at ROW access points no longer in use to discourage public access/use (APM-REC-7).

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 37 personnel during the reporting period. Additionally, topics included in the Worker Environmental Training Program are being reviewed daily during the morning contractor tailboard meetings.

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.

On October 20, 2015, Liberty Utilities notified the CPUC of a noncompliance action that involved removal of a mammal burrow before being properly cleared by a project biologist, as required under APM-BIO-16.

APM BIO-16, which requires pre-construction surveys to determine the status of unavoidable potentially active sensitive mammal burrows. The burrow was initially identified during project pre-construction surveys on July 29, 2015. In a subsequent attempt to assess the impact of the burrow removal, project biologists hand excavated and searched the disturbed area and the associated brush pile. No injured or dead animals were discovered during this search. Liberty Utilities notified the CPUC of this noncompliance action on October 20, 2015 via email.

On October 21, 2015, Liberty Utilities submitted a draft summary of the noncompliance action to the CPUC. On October 22, 2015, the CPUC requested that Liberty Utilities formalize their report into NCR 002 and include a work plan that indicates how similar non-compliant actions instances will be prevented in the future and a discussion of how the event relates to the actions identified in the Work Plan prepared by Liberty in response to NCR 001 issued by the CPUC. A revised NCR 002 was submitted to the CPUC on October 23, 2015, incorporating revisions requested by the CPUC. NCR 002 prepared by Liberty Utilities included a section addressing reinforcement of the MMCRP to ensure that such actions do not occur again, focusing on increased communication and reinforcement of compliance requirements at trainings (WEAP), tailboard meetings, and during conversations that occur throughout the day.

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:

- Completion of pulling in the fiber-optic cables, dead-ending, and clipping of the fiber optic line in the Northstar Fold.
- Completion of splicing the All-Dielectric Self-Supporting (ADSS) fiber-optic cable.
- Replacement of conduit at Pole #291101.
- Completion of revegetation/restoration work in all areas disturbed by the 650 Line Rebuild work conducted in 2015 under NTP-2.

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

Tree removal associated with the 650 Line rebuild were initiated on August 31, 2015. During the period covered by this report, the following tasks were completed or initiated:

- Timber harvest work between Pole #291105 and Brockway Summit, including gathering and piling limbs, lopping and scattering slash, and installing water bars and other erosion control devices.

Northstar Substation Rebuild (CPUC NTP No. 002)

Project tasks associated with the Northstar Substation rebuild were initiated on September 23, 2015. Project-related construction activity associated with the Northstar Substation Rebuild were completed in 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, completed in October 2015.

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

Initiated on August 31, 2015, estimated completion date is November 15, 2015.

ATTACHMENT A Photos



Photo 1: Revegetation/hydroseeding of Northstar fold area along a new ROW alignment, near the Northstar substation.

ATTACHMENT A (Continued)



Photo 2: Mulch applied within disturbed areas of the new ROW along the Northstar fold, near Pole #291263.

ATTACHMENT A (Continued)



Photo 3: Restored and mulched ROW, cut stumps treated with borate compound per APM-BIO-4.

ATTACHMENT A (Continued)



Photo 4: Spittler crossing near Pole #29110 removed and stream bank stabilized.

ATTACHMENT A (Continued)



Photo 5: Timber harvest activities near Pole #291169. Biological monitors present, in compliance with APM-BIO-21.

ATTACHMENT A (Continued)



Photo 6: Slash treatment following completion of construction activity in the ROW, in compliance with APM-SCE-1.

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
001	September 23, 2015	Additional Temporary Work Areas at Poles #291087 and #291098	Approved	September 29, 2015
-	-	-	-	-