

January 6, 2020

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

Re: Monthly Report Summary #14 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 **December 1 to 31, 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 NTPR 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).
NTP #2	6/6/2019	6/7/2019	Work within both the existing Sanger Substation footprint and the expansion area, including laydown/staging area setup; installation of pole foundations, installation of poles, power line stringing, removal of pull sites, and restoration of impacted property.

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

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
			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.
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

On-site 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 Monitors Evan Studley and Sam Hopstone visited the Sanger Substation construction site on **December 10, 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; on-site 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 December 2019 reporting period, PG&E did not self-report any compliance incidents, and the CPUC did not issue any compliance incident reports.

Noise Compliance

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

Public Concerns

No public concerns were reported during December 2019.

Sincerely,
Ecology and Environment, Inc.

A handwritten signature in black ink, appearing to read 'Silvia Yanez', with a horizontal line underneath the name.

Silvia Yanez
Project Manager

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

ATTACHMENT 1

CPUC COMPLIANCE MONITORING REPORTS

DECEMBER 10, 2019



Sanger Substation Expansion Project CPUC Compliance Monitoring Report

Project Proponent	Pacific Gas & Electric (PG&E)	Report No.	CM-CPUCDG-121019
Lead Agency	California Public Utilities Commission (CPUC)	Date (mm/dd/yy)	12/10/19
CPUC Project Manager	Michael Rosauer	Monitor(s)	Evan Studley, Sam Hopstone
CPUC (Ecology and Environment, Inc., member of WSP [E & E]) Monitoring Manager	Silvia Yanez	AM/PM Weather	Mostly Cloudy, 51°F, calm
CPUC (E & E) Monitoring Supervisor	Fernando Guzman	Start/End Time	9:00 AM – 10:15 AM
Project Notices to Proceed NTP(s)	NTP #2		

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 on-site 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 miles per hour (mph) on unpaved roads/10 mph off-road?	X		
Are observed vehicles/equipment arriving on-site 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 on-site 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 on-site?	X		
Are contaminated soils properly managed for on-site 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		

AREAS MONITORED

Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.

DESCRIPTION OF OBSERVED ACTIVITIES

9:00 AM- We arrived on-site through southernmost gate in the old substation and checked in with Jeff Clarkson (PG&E Senior Civil Inspector) and Ryan Slezak (CPUC Monitoring Supervisor). Mr. Clarkson provided a construction progress update. Past work included completion of the south fence and continuation of general contractor (GC) work. Current work includes the maintenance crew inspecting an existing bank, as well as replacing a foundation and barrier post at the microwave tower. The SWPPP compliance team is scheduled to update the SWPPP documentation today. The GC crews have paused work until conditions in the trenches dry up. Future work planned includes continuation of GC trench work and completion of the microwave tower. Jeff Clarkson’s civil crews plan to conclude activities in the next two weeks.

9:25 AM- We observed that retention pond holds water and remains in good condition (Photo 1). No erosion in the vicinity of the pond occurred, concrete swales conveyed stormwater to the pond, and little to no standing water was observed in the swales upstream of the pond.

9:30 AM- We entered the construction trailer and checked the SWPPP binder (APM GEO-2/APM WQ-1). Inspections from November have been added.

9:35 AM- We exited the construction trailer, proceeded north along western boundary. I observed that the ground in the new substation footprint was compacted with a sheeps foot prior to the rains, so little erosion occurred in the area. The open trenches were filled with water. The western swale contained little to no water, demonstrating that it drains well.

9:40 AM- We reached the north end of the western boundary. Both entries to the laydown yard were locked, materials inside were staged neatly, and no trash was observed. We proceeded east along the northern boundary. The north gate was locked and no evidence of trackout was observed. We turned south and proceeded along the eastern boundary.

9:50 AM- I observed crews excavating the area of a former foundation and barrier post around the microwave tower. South of them, in the old substation footprint, another crew was draining a bank to 55-gallon oil drums to inspect the container. The drums were stored off the ground (Photo 5), and a spill kit was kept handy in case of emergency (APM HAZ-1).

9:55 AM- We checked in with Mr. Clarkson and Mr. Slezak.

10:15 AM- We exited the project site through southernmost gate in old substation.

NEW SENSITIVE RESOURCE DISCOVERIES

MITIGATION MEASURES VERIFIED

APM AES-3, APM AIR-1, APM BIO-11, MM BIO-2, APM GEO-2/APM WQ-1, MM-HAZ-1, APM NOI-4, MM TRAN-1

See additional applicant proposed measures (APMs) and mitigation measures (MMs) listed in the Description of Observed Activities section.

RECOMMENDED FOLLOW-UP

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:

None.

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:

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
12/10/19	Detention pond		Photo 1- Retention pond remains in good condition; scarified bottom has increased infiltration rate. Photo facing southwest.
12/10/19	Expansion footprint		Photo 2- Equipment on-site use drip pans under every potential leak, not just oil sump. Photo facing south.
12/10/19	Expansion footprint		Photo 3- Open pits are covered to prevent wildlife access and roped off to prevent pedestrian access. Photo facing southwest.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
12/10/19	Expansion footprint		Photo 4- Crews excavate a damaged foundation under microwave tower. Photo facing southeast.
12/10/19	Expansion footprint		Photo 5- Crews inspecting tanks stage oil drums off the ground, and keep spill kits within immediate reach. Photo facing south.

Completed by:	Evan Studley, Sam Hopstone
Firm:	Soar Environmental Consulting, Inc.
Date:	12/10/19
Reviewed by:	Sam Hopstone
Firm:	Soar Environmental Consulting, Inc.
Date:	12/13/2019