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|  | California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i> |
| | Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 031 November 26, 2017 |

SUMMARY

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Report (FEIR)/Final Environmental Impact Statement (FEIS) for the Cleveland National Forest Power Line Replacement Projects. 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 FEIR/FEIS 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. Photos of site observations are included in Attachment A of this report. A summary of the Notices to Proceed (NTP) and Minor Project Refinement Requests (MPRRs) are provided in Attachments B and C, respectively.

This compliance status report covers construction activities from November 13 through November 26, 2017.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party environmental compliance monitor conducted site observations in areas under active construction, which included Transmission Line (TL) 682, Circuit (C) 78, and the associated staging/fly yards. Areas of active and inactive construction were observed to verify implementation of the mitigation measures stipulated in the project's MMCRP. Observations were documented using site inspection forms. Applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed for implementation in the field.

Implementation Actions

During this reporting period along C 442, construction activities observed by Dudek third party ECMs included clearing vegetation (See Photo 1 – Attachment A), installing erosion control BMPs (i.e. fiber

rolls) (See Photo 2 – Attachment A), drilling pole holes (See Photo 3 – Attachment A), digging anchor holes, grading/repairing existing access roads (See Photo 4 – Attachment A), and delineating a designated helicopter landing area at Corte Madera Staging Area. Along C 78, crews were observed clearing vegetation (See Photo 5 – Attachment A), installing erosion control BMPs, digging anchor holes, and pulling rope for wire stringing with the assistance of a helicopter. Along TL 682, construction crews were observed chipping vegetation, installing ground wire and rods (See Photo 6 – Attachment A), drilling pole holes, setting poles, and proof-testing micropiles.

During this reporting period, CPUC ECMs observed implementation of dust control measures including the application of water on access roads and in work areas, in accordance with APM AIR-02, and project personnel maintaining posted speeds of 15 miles per hour on unpaved roads, in accordance with APM AIR-03 and MM BIO-24. During helicopter external load operations, water was used to prevent dust emissions caused by rotor wash in accordance with the Aviation Safety Plan (MM PHS-5).

During construction activities, crews were observed adhering to delineated work limits and working within existing access roads in accordance with MM BIO-1 (See Photo 4 – Attachment A). In accordance with MM BIO-3 and MM BIO-22, biological monitors were observed conducting full time monitoring of initial ground-disturbing activities as well as vegetation clearing (See Photo 5 – Attachment A). To prevent wildlife entrapment, completed pole holes were observed securely covered in accordance with MM BIO-23. Crews were observed using trash bags to contain and collect trash at worksites in accordance with MM BIO-26. On November 15, during pole hole drilling at Z118016 (TL 682), a steel plate used to cover the pole hole after completion was observed laying down outside of the delineated workspace on a sheet of plastic. The SDG&E Lead Environmental Inspector (LEI) was notified of the issue, who then directed the crew to bring the steel plate back into the workspace. Sensitive biological resources were not impacted as a result. On November 17, the third party ECM notified the on-site biological monitor that a bucket truck outrigger being used during rope stringing (in preparation for wire stringing) was observed just outside of the workspace limits at Pole P172711. The biological monitor said that the area would be documented.

Cultural resource monitors, including archaeological and Native American monitors, were observed monitoring ground disturbing activities, such as trenching associated with ground wire and rod installation, and inspecting excavated soils for potential sensitive cultural resources along TL 682 and in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (See Photo 6 – Attachment A). In addition, cultural resource monitors were observed monitoring construction activities near adjacent cultural resource ESAs along C 442, which were fenced off to prevent unauthorized access into areas with previously recorded cultural resources.

During construction activities along all rights-of-way, construction fire patrols were observed inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1). Construction crews were observed staging the required fire tools and equipment based on the Project Activity Level (on Cleveland National Forest (CNF land)/Fire Potential Index (off CNF land) and the construction activity being performed as allowed in the Fire Prevention Matrices CFPPP (MM FF-1 and

APM HAZ-01) (See Photo 1 – Attachment A). In addition to a set of fire tools (5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher), 100 gallons of water with a pump and hose was observed on site for activities that required it, such as access road grading near Pole P177005 (C 442), chipping of vegetation at Pole P176998 (C 442), and trenching for ground wire and rod installation at Pole Z118056 (TL 682).

Site-specific erosion and sediment control BMPs continued to be observed along the project rights-of-way in accordance with the project SWPPP, MM HYD-1, APM HYD-09, and MM BIO-7. Sediment control BMPs included the use of fiber rolls, silt fencing, and prowattle at pole replacement sites and staging yards. During this reporting period, crews were observed installing fiber rolls around the perimeter of Corte Madera Staging Yard (C 442) (See Photo 2 – Attachment A), and at pole replacement sites along the C 442 and C 78 alignments. Tracking control BMPs designed to prevent offsite dirt and mud tracking onto public roadways included the use of rock aprons at entrances to project access roads and staging yards. Recently installed tracking control BMPs were documented at the entrance to Corte Madera Staging Yard.

To prevent leaks and spills from being discharged into the soil in accordance with the Spill Response and Notification Plan (MM PHS-2), crews were observed implementing spill prevention BMPs which included the use of secondary containment beneath hazardous materials and fuel tanks, double walled fuel tanks, drip pans beneath staged equipment and sanitary facilities, and spill kits.

In accordance with the aviation safety plan (MM PHS-5), a crew member was observed delineating a designated helicopter landing area at Corte Madera Staging Yard (C 442), and during wire stringing activities at C 78, helicopter landing and fueling were observed being conducted at an approved staging area at P172713.

In accordance with APM TRANS-02, implementation of traffic control measures continued to be observed in this reporting period. Traffic control measures, such as the placement of signage and cones as well as the use of flag persons were observed along C 78 and Viejas Grade Road, and along TL 682 when work occurred adjacent to Highway 76.

In accordance with APM VIS-01, construction activities were kept as clean and inconspicuous as possible.

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 FEIR/EIS in the Decision for the Power Line Replacement Projects, as adopted by the CPUC on May 26, 2016 (Decision D.16-05-038) and the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP).

Compliance Status

CPUC third-party environmental monitors observed overall compliance with mitigation measures throughout the reporting period.

No non-compliances were recorded during this reporting period.

CONSTRUCTION SCHEDULE AND PROGRESS

SDG&E began construction activities associated with NTP-1 on September 23, 2016. All project activities are scheduled to be complete by 2020.

TL 625B

During this reporting period, construction crews conducted punch-list work and site cleanup. The estimated completion date is November 2017. Approximately 99% complete.

TL 629E

During this reporting period, construction crews maintained erosion control BMPs and conducted punch-list work. The estimated completion date is March 2018. Approximately 85% complete.

TL 6931

During this reporting period, construction crews maintained erosion control BMPs and conducted punch-list work. The estimated completion date is November 2017. Approximately 98% complete.

TL 682

During this reporting period, construction crews drilled foundations, spread conductor, installed poles, and maintained Stephens' kangaroo rat exclusion barriers. The estimated completion date is November 2018.. Approximately 7% complete.

C 78

During this reporting period, construction crews cleared workspaces and installed erosion control BMPs, dug pole holes, installed poles, and installed anchors. The estimated completion date is January 2018. Approximately 40% complete.

C 442

During this reporting period, construction crews cleared workspaces and installed erosion control BMPs, installed Environmentally Sensitive Area (ESA) signs, completed the development of Corte Madera Staging Yard, trimmed trees, and dug pole holes. The estimated completion date is February 2018. Approximately 12% complete.

ATTACHMENT A Photos



Photo 1: A construction crew observed clearing vegetation at Pole P176998 (C 442). The crew was observed staging the required 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher, along with 100 gallons of water with pump and hose (not pictured) in accordance with Fire Prevention Matrix (off CNF land), CFPPP (MM FF-1 and APM HAZ-01), and APM HAZ-04.

ATTACHMENT A (Continued)



Photo 2: A construction crew observed installing perimeter fiber rolls at Cortez Madera Staging Yard (C 442) in accordance with the project's Erosion Control Plan, SWPPP (MM HYD-1, MM BIO-7) and APM HYD-09.

ATTACHMENT A (Continued)



Photo 3: During pole hole drilling at Pole Z118044 (TL 682), drill spoils were placed on a sheet of plastic to prevent erosion in accordance with the project's Erosion Control Plan, SWPPP (MM HYD-1, MM BIO-7) and APM HYD-09.

ATTACHMENT A (Continued)



Photo 4: During the grading and maintenance of an existing access road near Pole P177001 (C 442), stakes were installed along the road limits to ensure grading was conducted only within approved areas in accordance with MM BIO-1.

ATTACHMENT A (Continued)



Photo 5: During vegetation clearing at Pole P257735 (C 78), a biological monitor was observed on site in accordance with MM BIO-3 and MM BIO-22.

ATTACHMENT A (Continued)



Photo 6: During trenching for ground wire and rod installation, an archeological monitor was observed on site inspecting excavated soils for the presence of sensitive cultural resources in accordance with the Historic Properties Management Plan, MM CUL-1, MM CUL-3, and APM CUL-04.

ATTACHMENT B Notices to Proceed

| NTP No. | Date Issued | Description | Conditions Included (Y/N) |
|----------------|--|---|----------------------------------|
| CPUC – 001 | September 21, 2016, updated October 31, 2016 | Construction activities associated with TL 625B and TL 629E | Y |
| CPUC-002 | March 15, 2017 | Construction activities associated with TL 6931 | Y |
| CPUC-003 | March 24, 2017 | Geotechnical activities associated with TL 682 | Y |
| CPUC-004 | June 27, 2017 | Construction activities associated with TL 682 Phase I : Pole Z118102 to Warners Substation | Y |
| CPUC-005 | July 10, 2017 | Geotechnical activities associated with C440 and C449 | Y |
| CPUC-007 | August 15, 2017 | Construction activities associated with C78 | Y |
| CPUC-008 | November 8, 2017 | Construction activities associated with C442 | Y |

ATTACHMENT C

Minor Project Refinement Request

| Minor Project Refinement Request No. | Submitted | Description | Status | Approval |
|--------------------------------------|---------------------------------|--|---------------------------------|----------|
| 001 | 10/5/16, Revised 10/18/16 | Request for Modifications to the Anderson, Merrigan and Japatul Spur Staging Yards | Approved | 10/21/16 |
| 002 | 2/21/16 | Modifications to TL 625B and TL 629E | Approved, with Conditions | 2/10/17 |
| 003 | 1/18/17 | Use of Additional Water Source | Approved, with Conditions | 4/4/17 |
| 004 | 3/20/17 | Use of Orchard Staging Yard and Nursery Staging and Fly Yard | Approved, with Conditions | 5/16/17 |
| 005 | 5/9/17 | Modifications to C78 | Approved | 8/15/17 |
| 006 | 6/20/17 | Drainage Structure Installation at Pole Z272867 (TL 625B) | Approved | 7/6/17 |
| 007 | 8/1/17 | Love Valley Staging and Fly Yard | Approved | 9/25/17 |
| 008 | 8/14/17 | Mendenhall Fly Yard (TL 682) | Approved | 9/1/17 |
| 009 | 10/10/17 | Request for refinements for Phase I and Phase II of TL682 | Approved | 11/22/17 |
| 010 | 10/16/17 | Addition of staging area and shift of pole P257776 (C78) | Approved | 10/27/17 |