

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 033 December 24, 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 December 11 through December 24, 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) 442, 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 trenching and installing ground rods, clearing vegetation (See Photo 1 – Attachment A), hand excavating pole holes (See Photo 2 – Attachment A), drilling pole holes, removing wooden poles, installing pole anchors, framing and setting poles (See Photo 3 – Attachment A), and installing erosion control best management practices (BMPs). Along TL 682, crews were observed drilling pole holes, spreading wire, capping micropiles, grouting, trenching and installing ground rods, using helicopter external load operations to mobilize poles and site materials, setting poles (See Photo 4 – Attachment A), pouring concrete foundations, and drilling micropiles (See Photo 5 – Attachment A).

During this reporting period, CPUC ECMs observed implementation of dust control measures including the application of water on access roads, work areas, and staging yards 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 generally observed working within delineated work limits and remaining on existing access roads in accordance with MM BIO-1, however, a Level 1 Minor Deviation was observed on TL 682 on December 12 (See Compliance Status on Page 4).

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. Crews were observed using trash bags to contain and collect trash at worksites in accordance with MM BIO-26. On December 13, when the excavation at Pole P176990 was uncovered to install ground rods, one ground squirrel and five field mice were observed deceased at the bottom of the excavation. After the excavation had initially been drilled, it had been securely covered to prevent wildlife entrapment (MM BIO-23), but it is believed that during the previous week's extreme wind events, a small part of the plastic sheeting that had been covering the hole may have blown open.

Cultural resource monitors, including Archaeological and Native American monitors, were observed monitoring ground disturbing activities, such as pole hole drilling, and inspecting excavated soils for potential sensitive cultural resources along TL 682 and C 442 in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (See Photo 2 – Attachment A). Cultural resources ESAs were fenced off along TL 682 and C 442 to prevent unauthorized access into areas with previously recorded cultural resources. On December 11, an Archaeological Monitor was observed recording a sensitive cultural resource along C 442.

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) (See Photo 3 – Attachment A). Construction crews were observed staging the required fire tools and equipment based on the Project Activity Level (on 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). In addition to a set of fire tools (5 gallon backpack pump, round point shovel,

Pulaski, and 2A10BC fire extinguisher), 150 gallons of water with a pump and hose was observed on site for activities that required it, such as trenching for ground rod installation at Pole Z118138 (TL 682) during PAL C conditions on CNF land. On December 21, vegetation clearing crews did not work on CNF land due to PAL Ev conditions; neither chain saw use nor chipping was allowed on CNF land (CFPPP Fire Prevention Matrix).

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. Tracking control BMPs designed to prevent offsite dirt and mud tracking onto public roadways included the use of rock aprons and rattle plates at entrances to project access roads and staging yards.

On December 15, the third party ECM informed an on-site Biological Monitor that track out was observed on the pavement at the entrance to Mendenhall Staging Yard and on Highway 76 (TL 682), even after the water truck was observed being driven over the rattle plates multiple times to shake excess mud off the tires. The Biological Monitor informed the Blackhawk Environmental Monitor and the project lead environmental inspector (LEI), and shortly after, the LEI and construction personnel were observed cleaning the track out (in accordance with the SWPPP).

On December 16, the third party ECM notified the project LEI about a small sediment breach over the prowattle at Pole Z118164 (TL 682). The LEI passed along the info to the Blackhawk environmental monitor, who was preparing a BMP repair punch list. On December 20, the third party ECM notified the project LEI of approximately 2.5 feet of prowattle detached from the ground surface at Pole Z118114 (TL 682) and of sediment overload on the perimeter prowattle at Pole Z118132. Shortly after, the on-site Biological Monitor was observed shoveling away the sediment load on the perimeter prowattle (See Photo 6 – Attachment A). The BMP maintenance needs were communicated to the Blackhawk environmental monitor.

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 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 during helicopter external load activities across East Grade Road and activities adjacent to Highway 76 (TL 682), and along Corte Madera Road to prevent congestion on the one-lane road (C 442).

In accordance with APM VIS-02, construction activities were kept as clean and inconspicuous as possible.

On December 16, the third party ECM asked the project LEI about measures being taken in regard to arroyo toad protection between Poles Z118180-Z118172 (TL 682). The LEI stated that the arroyo toad Authorized Biologist is monitoring weather conditions and is in contact with the LEI about monitoring needs and protection measures to be implemented once arroyo toads become more active (in accordance with the Streambed Alteration Agreement). It was noted that although it is officially arroyo toad season, weather conditions have not been suitable for increased activity quite yet.

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.

A Level 1 Minor Deviation (MM BIO-1) was observed on TL 682 on December 12. In the morning, the project LEI had notified the third party ECM that on Saturday, December 2, 2017 a water pipe adjacent to the work site had broken at Pole Z310149. The pipe had been repaired on December 3, 2017 by the landowner, resulting in some ground disturbance adjacent to the work site. This disturbance was not project related. No work occurred at this site from December 4 to December 10 due to a National Weather Service issued Red Flag Warning. On December 12, 2017, the third party ECM observed construction crews using the additional disturbed area that had been created by the land owner on Saturday, December 2, 2017. No work limits stakes were visible in this particular area. The LEI was on site and discussed the use of the space with the crew. The crew agreed to be more mindful of the space they use and the Blackhawk Environmental Monitor was notified to re-stake the work site. No sensitive resources were impacted by the land use.

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 January 2018. 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 January 2018. Approximately 98% complete.

TL 682

During this reporting period, construction crews maintained erosion control BMPs, conducted overhead work, drilled pole holes, grouted and tested micropiles, conducted slope stabilization, and maintained Stephens' kangaroo rat exclusion barriers. The estimated completion date is November 2018. Approximately 9% complete.

C 78

During this reporting period, construction crews maintained erosion control BMPs, installed poles, and conducted limited overhead work. The estimated completion date is February 2018. Approximately 40% complete.

C 442

During this reporting period, construction crews cleared workspaces and installed erosion control BMPs, dug pole holes, installed poles, and strung conductor. The estimated completion date is February 2018. Approximately 14% complete.

ATTACHMENT A Photos



Photo 1: A construction crew is observed clearing vegetation at the wire stringing site near Pole P176988 (C 442).

ATTACHMENT A (Continued)



Photo 2: A construction crew observed using a jackhammer and hand tools to dig an excavation at Pole P177004 (C 442). Archaeological and Native American Monitors were observed inspecting excavated soil in accordance with MM CUL-1.

ATTACHMENT A (Continued)



Photo 3: A construction crew observed framing and preparing the pole to be set at Pole P177016 (C 442). A Fire Patrol was observed accompanying the crew and inspecting the site for compliance with the CFPPP.

ATTACHMENT A (Continued)



Photo 4: During pole setting along TL 682, a cultural resources ESA was observed adjacent to the work area in accordance with the Historic Properties Management Plan.

ATTACHMENT A (Continued)



Photo 5: A construction crew observed drilling micropiles at Pole Z118113 (TL 682).

ATTACHMENT A (Continued)



Photo 6: A Biological Monitor was observed removing excess sediment piled up on the perimeter of a prowatte at Pole Z118132 (TL 682), shortly after the Lead Environmental Inspector was notified of the issue.

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
CPUC-009	December 12, 2017	Geotechnical borings and seismic surveys along TL 629A and TL 625D	Y
CPUC-010	December 18, 2017	Construction activities associated with Phase 1 of C 440	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