

	<p><b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting Program</i></b></p>
	<p><b>Cleveland National Forest Power Line Replacement Projects</b></p> <p><b>Compliance Status Report: 034</b></p> <p><b>January 7, 2018</b></p>

**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 25, 2017 through January 7, 2018. Due to a holiday break, no work occurred between December 25, 2017 and January 2, 2018.

**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 framing steel replacement poles (See Photo 1 – Attachment A), drilling anchor holes (See

Photo 2 – Attachment A), and installing ground rods. Along TL 682, crews were observed installing erosion control best management practices (BMPs), setting up drill platforms and drilling micropile foundation holes (See Photo 3 – Attachment A), spreading wire in preparation for helicopter external load delivery, trimming trees and chipping (See Photo 4 – Attachment A), drilling pole holes (See Photo 5 – Attachment A), installing ground rods, 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 micropile drilling activities at Pole Z118106 (TL 682), the ECM observed a containment box being used to capture drill cuttings and prevent dust emissions.

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 2 – Attachment A). However, on January 3, a construction crew let down two legs of the drill platform outside the work limits at Pole Z118111 (TL 682), and on January 5, a construction crew staged a workbox outside the work limits at Pole Z118128 (TL 682) due to the steepness of the site and safety concerns. Both sites were surveyed by Biological and Archaeological Monitors in advance to ensure no sensitive resources would be damaged.

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. 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. In accordance with MM BIO-28, the Avian Protection Plan, and the Nesting Bird Management Plan, sites along the alignments were surveyed for nesting raptors prior to work activities. On January 4, a Biological Monitor on C 442 notified the CPUC ECM that a one-mile nesting buffer had been established around a Bald Eagle nest originally observed on December 23, 2017, and that all work is being conducted outside the buffer until a buffer reduction is approved (See Photo 6 – Attachment A).

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 in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (See Photo 5 – Attachment A). In addition, cultural resources ESAs were fenced off to prevent unauthorized access into areas with previously recorded cultural resources.

During construction activities along both 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 4 – 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). A set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) was observed at all active construction sites.

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.

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. On January 3, a construction crew member was observed cleaning up concrete that had leaked from grouting equipment at Pole Z118113 (TL 682). The concrete was properly cleaned up and disposed of.

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 Corte Madera Road (C 442) to prevent congestion on the one-lane road, as well as 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

No work was conducted on this component during this reporting period. The estimated completion date is January 2018. Approximately 99% complete.

TL 629E

No work was conducted on this component during this reporting period. The estimated completion date is March 2018. Approximately 85% complete.

TL 6931

No work was conducted on this component during this reporting period. The estimated completion date is January 2018. Approximately 98% complete.

TL 682

During this reporting period, construction crews drilled pole holes, grouted and tested micropiles, installed poles with insulators, tested and capped poles, removed and/or topped poles, performed wire stringing, conducted tree trimming, and installed and maintained erosion control BMPs. The estimated completion date is November 2018. Approximately 12% complete.

C 78

No work was conducted on this component during this reporting period. The estimated completion date is February 2018. Approximately 40% complete.

C 442

During this reporting period, construction crews installed poles, anchors, and ground rods, removed poles, drilled pole holes, conducted vegetation clearing, adjusted workspaces, conducted overhead work, maintained access roads, and installed and maintained erosion control BMPs. The estimated completion date is February 2018. Approximately 18% complete.

## ATTACHMENT A Photos

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**Photo 1:** A construction crew observed framing a steel pole at Pole P176991 (C 442).

## ATTACHMENT A (Continued)



**Photo 2:** During anchor hole drilling at Pole P176988 (C 442), crews were observed adhering to the delineated work space limits in accordance with MM BIO-1.

## ATTACHMENT A (Continued)



**Photo 3:** During micropile foundation drilling at Pole Z118106 (TL 682), ESA fencing was observed around the work space in accordance with the Historic Properties Management Plan.

## ATTACHMENT A (Continued)



**Photo 4:** During tree trimming and chipping at the wire stringing site between Poles Z202586 and Z118122 (TL 682), a fire patrol was observed monitoring the activity in accordance with the CFPPP.

## ATTACHMENT A (Continued)



**Photo 5:** During pole hole drilling at Pole Z118002 (TL 682), Archaeological and Native American Monitors were observed monitoring the activity in accordance with the HPMP, MM CUL-1, MM CUL-3, and APM CUL-04.

## ATTACHMENT A (Continued)



**Photo 6:** Nesting buffer signage was observed on Corte Madera Road to mark the limits of a one-mile buffer surrounding a Bald Eagle nest (C 442).

## ATTACHMENT B Notices to Proceed

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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

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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