

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p>
	<p>Cleveland National Forest Power Line Replacement Projects</p> <p>Compliance Status Report: 035</p> <p>January 21, 2018</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 January 8, 2017 through January 21, 2018.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party environmental compliance monitor (ECM) 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 clearing vegetation and installing erosion control Best Management Practices (BMPs),

excavating/drilling pole and anchor holes, performing maintenance grading of existing access roads, spreading wire and installing wire protectors (See Photo 1 – Attachment A), and setting poles, removing old pole butts, and stringing wire. Along TL 682, crews were observed clearing vegetation and installing erosion control BMPs (See Photo 2 – Attachment A), drilling poles holes, constructing a foundation rebar cage and pouring concrete for conventional foundations (See Photo 3 – Attachment A), mobilizing equipment and materials, spreading wire, conducting helicopter external load operations to assist in micropile foundation construction activities, proof testing for micropile foundations (See Photo 4 – Attachment A), and stringing wire. Along TL 629A, a construction crew was observed conducting geotechnical borings (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 and in work areas in accordance with APM AIR-02. Project personnel were observed 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 along the TL 682 alignment, the ECM observed containment boxes being used to capture drill cuttings and prevent dust emissions. During helicopter external load operations being conducted at Corte Madera Staging Yard (C 442) and Love Valley Staging Yard (TL 682), water trucks were observed being used for as-needed watering to prevent dust emissions from rotor wash in accordance with the aviation safety plan and 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. On January 8, a water buffalo was observed staged outside of the workspace at Pole P176980, and on January 11, a PAR bucket truck slid slightly off of the access road between poles P176894 and P176895 (C 442). Both areas were surveyed by biological monitors and there were no impacts to sensitive environmental resources.

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 to be securely covered or an earthen ramp was constructed (for shallow excavations) 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 the Avian Protection Plan/Nesting Bird Management Plan and MM BIO-28, avian biologists were observed surveying for nesting raptors ahead of scheduled work activities along C 442, TL 682, and TL 629A. On January 11, the lead biological monitor at C 442 notified the CPUC ECM that a nest buffer reduction had been approved to reduce a 1-mile nest buffer around a Bald Eagle nest to 3,335 feet, which would allow work to continue along the entire C 442 alignment.

In accordance with the Streambed Alteration Agreement, an authorized biologist monitored construction activities in Arroyo Toad habitat along TL 682 and inspected exclusionary fencing along the access road near Pole Z118180. The Lead Environmental Inspector (LEI) ensured that construction crews vacated work sites in Arroyo Toad habitat prior to sunset. On January 17, the LEI notified the CPUC ECM that during fiber optic stringing between poles Z118181 and Z118180, fiber optic cable had sagged into the

cottonwood trees located between the two poles. To achieve proper clearance, a tree trimming crew was dispatched to the location, and since the cottonwood trees were located in Arroyo Toad habitat, the Arroyo Toad authorized biologist accompanied the tree trimming crew and monitored for Arroyo Toads.

During this reporting period, construction activities occurring in Stephens' Kangaroo Rat (SKR) habitat (TL 682) were monitored by both an approved SKR biologist and biological monitors. SKR barriers around pole replacement work sites appeared to be in good condition and functional. Pin flags were placed at SKR burrows by the approved SKR biologist to ensure construction crews avoid impacting the burrows. On January 18, the project LEI notified the CPUC ECM that ground conditions would be monitored during and after a forecasted rain event to ensure SKR burrows would not be impacted by heavy equipment due to potentially saturated and softened soil conditions.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities, such as vegetation clearing, BMP installation, and pole hole drilling. Cultural resources monitors inspected excavated soils for potential sensitive cultural resources in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (See Photo 2 – Attachment A). In addition, cultural resources environmental sensitive areas (ESAs) were fenced to prevent unauthorized access into areas with previously recorded cultural resources.

During construction activities, construction fire patrols were observed inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) and MM FF-1 (See Photo 1 – 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 CFPPP Fire Prevention Matrices. A set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) was observed at all active construction sites in accordance with APM HAZ-01 and APM HAZ-04. During rebar foundation construction at Nursery Staging Yard (TL 682), a Capstone fire patrol was observed issuing a hot work permit, wetting down the surrounding area, and monitoring the hot work activity in accordance with the CFPPP.

Site-specific erosion and sediment control BMPs continued to be observed along the project rights-of-way in accordance with the project Storm Water Pollution Prevention Plan (SWPPP), MM HYD-1, MM BIO-7, and APM HYD-09. Sediment control BMPs included fiber rolls, silt fencing, and prowattle were observed to be in good condition at pole replacement sites and staging yards (See Photo 4 – Attachment A). During drilling and excavating of pole holes, dirt spoil was placed on visqueen and/or covered.

On January 9, construction work was called off for the day due to rainy, wet, and slippery conditions. On January 10 (post rain event), the LEI notified the CPUC ECM that biological monitors and construction contractor environmental monitors would be inspecting BMPs and compiling a list of those that needed maintenance along TL 682. The CPUC ECM observed prowattle in need of maintenance at poles Z118179 and Z118180, and relayed that information to the LEI so that those sites could be added

to the list. On January 11, the lead biological monitor at C 442 informed the CPUC ECM that BMPs were also being inspected along the C 442 right-of-way, and a list of sites with BMPs needing maintenance would also be sent to the construction contractor for repairs. On January 18, the project LEI notified the CPUC ECM that additional rocks would be added to the Nursery Staging Yard (TL 682) entrance to maintain the trackout prevention BMP in accordance with the SWPPP and APM AIR-02. To prevent impacts to streambeds and triggering compensatory measures required by Section 3 of the Streambed alteration agreement, “no grading” signage was observed posted on both sides of access road stream crossings along C 442.

To prevent leaks and spills from being discharged into the soil in accordance with the Spill Response and Notification Plan and 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 (See Photo 5 – Attachment A). On January 8, the CPUC ECM notified the C 442 lead biological monitor of an observed backhoe staged near an adjacent drainage at Pole P258119 without drip/spill containment as required by Section 2.25 of the Streambed Alteration Agreement. The lead biological monitor said that the crew would be reminded to use proper drip/spill prevention BMPs or to stage the backhoe away from the drainage when not in use.

On January 10 (post rain event), construction contractor environmental monitors were observed using absorbent material to separate and clean oil and gas sheens from accumulated rainwater in drip/spill prevention containers at Warner Substation Staging Yard (TL 682) (See Photo 6 – Attachment A). Construction crews were also reminded at the morning tailboard to notify an environmental monitor if sheens were detected in drip/spill containment bins at their worksites so that proper cleanup and disposal could occur. During foundation construction, all concrete washouts were conducted into excavations where the concrete was poured, into a designated washout container, or captured in a holding tank in accordance with APM HYD-01 (See Photo 3 – Attachment A).

In accordance with APM TRANS-02, traffic control measures were implemented during 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, along Highway 76, and along River Drive.

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.

Transmission Line (TL) 625B

During this reporting period, construction crews inspected and maintained erosion control best management practices (BMPs). The estimated completion date is February 2018. Approximately 99% complete.

TL 629E

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

TL 6931

During this reporting period, construction crews inspected and maintained erosion control BMPs. The estimated completion date is February 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 inspected and maintained erosion control BMPs. The estimated completion date is November 2018. Approximately 12% complete.

TL 629A Geotechnical Work

During this reporting period, construction crews conducted geotechnical borings and inspected and maintained BMPs. This work was 100% completed.

Circuit (C) 78

During this reporting period, construction crews removed poles, installed poles, conducted overhead work, and inspected and maintained erosion control BMPs. 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 March 2018. Approximately 24% complete.

ATTACHMENT A Photos



Photo 1: A construction crew was observed spreading wire at Pole P176995 (C 442) to provide the overhead space needed for helicopter delivery of equipment and materials. A fire patrol was observed monitoring the work activity in accordance with the Construction Fire Prevention/Protection Plan and MM FF-1.

ATTACHMENT A (Continued)



Photo 2: During vegetation clearing at Pole Z118029 (TL 682), archeological and Native American monitors were present in accordance with the Historic Properties Management Plan, MM CUL-1, MM CUL-3, and APM CUL-04.

ATTACHMENT A (Continued)



Photo 3: A construction crew observed pouring concrete at Pole Z118004. A dirt stockpile leftover from drilling was covered with visqueen to prevent erosion in accordance with the Storm Water Pollution Prevention Plan, MM HYD-1, MM BIO-7, and APM HYD-09. Concrete washout was placed in a washout bin in accordance with APM HYD-01.

ATTACHMENT A (Continued)



Photo 4: A construction crew observed drilling for a micropile foundation at Pole Z118109 (TL 682). Silt fencing was observed along the down slope side of the work space in accordance with the Storm Water Pollution Prevention Plan, MM HYD-1, MM BIO-7, and APM HYD-09.

ATTACHMENT A (Continued)



Photo 5: During geotechnical boring at B-4 (TL 629A), a drip pan was observed beneath a gas powered pump to prevent leaks/spills from being discharged into the soil in accordance with the Spill Response and Notification Plan and MM PHS-2.

ATTACHMENT A (Continued)



Photo 6: A construction contractor environmental compliance monitor is observed using absorbent pads to separate and soak up oil/gas sheens from accumulated rain water in spill prevention containers at the Warner Substation Staging Yard (TL 682) in accordance with the Spill Response and Notification Plan and MM PHS-2.

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