

California Public Utilities Commission *Mitigation Monitoring, Compliance, and Reporting Program* 

South of Palermo 115 kV Reinforcement Project

**Compliance Status Report: 03** 

**September 30, 2018** 

## SUMMARY

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Initial Study (FIS)/Mitigated Negative Declaration (MND) for the South of Palermo 115 kV Reinforcement Project. 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 FIS/MND 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. Summaries of the Notices to Proceed (NTP) and Minor Project Refinements (MPR) are provided in Attachments B and C, respectively.

This compliance status report covers construction activities from September 1 through September 30, 2018.

### CONSTRUCTION SCHEDULE AND PROGRESS

PG&E began construction activities associated with NTP-1 on July 1, 2018. Additional construction activities associated with NTP-2 were started concurrently on September 6, 2018. All project activities are scheduled to be complete by the end of 2021.

#### **Bogue Sub-Line Segment**

During this reporting period, vegetation crews cleared work areas as required to support foundation installation and tower installation. Tower crews completed installation of foundations on the Bogue Sub Segment and installed lower structure sections. Line crews began to install the tops on the towers after which the lower sections and existing foundations of the old towers and poles were removed by tower crews. Crews have finished establishing winterized landing zones and pull sites to support reconductoring once all towers are replaced.

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#### South of Palermo Line

A pre-construction survey for special status-species and sensitive resource areas was performed at pull site 9/67 on the South of Palermo Line Segment. Following the survey, the pull site was winterized and a silt fence was installed as a part of best management practices to protect nearby vernal pool habitat during future construction at the site.

## MITIGATION MONITORING, COMPLIANCE, AND REPORTING

#### Site Inspections/Mitigation Monitoring

A CPUC third-party environmental monitor (EM) conducted site observations in areas under active construction along the Bogue Sub-Line Segment. 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, and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

#### Implementation Actions

#### Bogue Sub-Line Segment

Activities observed during this reporting period along the Bogue Sub-Line Segment included tower midspan, top, and transmission line installations, vegetation clearance in work areas as required for the installation of foundations (MM HAZ-1), installation of Storm Water Pollution Prevention Plan Best Management Practices (SWPPP BMPs) to control erosion and prevent disturbance to vernal pool habitat (APM HYDRO-1, APM BIO-6) (see photo 1), and installation of gravel to winterize any sites for reconductoring work in the coming fall/winter (APM HYDRO-1; see photo 2).

During the reporting period, the EM observed appropriate buffers marked to prevent impacts to previously identified resources within the vicinity of work areas, including Valley Elderberry Longhorn Beetle (VELB) host plants, in accordance with APM BIO-8. Preconstruction surveys for special-status species (including Giant Garter Snakes) were conducted in accordance with APM-BIO 2, and construction areas near suitable Giant Garter Snake habitat had exclusion fencing installed in accordance with APM BIO-9 (see photo 3) and biological monitors were observed onsite during fence installation. Water trucks were observed operating along roads and in work areas in accordance with APM AQ-1 and the Fugitive Dust Control Plan (see photo 4).

#### South of Palermo Line

The CPUC EM observed winterizing activities at pull site 9/67, including silt fence installation and maintenance as well as gravel base installation.

### Mitigation Measure Tracking

Mitigation measures applicable to the construction activities were verified in the field and documented in the CPUC's mitigation measure tracking table. A complete list of mitigation measures and applicant

proposed measures is included in the FIS/MND in the Decision for the Power Line Reinforcement Project, as adopted by the CPUC on May 16, 2018 (Decision 18-05-014) and the MMCRP.

#### **Compliance** Status

No minor deviations or non-compliances were issued this reporting period.

## ATTACHMENT A Photos



**Photo 1**: Exclusion fencing and installation of SWPPP BMPs are installed in accordance with APM BIO-6.



**Photo 2:** Completed winterization of landing/pull site for future reconductoring work at structure Palermo 0/1. Silt fencing has also been installed in accordance with SWPP BMPs.



**Photo 4:** Wildlife exclusion fencing is installed along access to structure 1/13 in accordance with APM BIO-9.



**Photo 5:** Water truck running to suppress dust during work at Pull Site 9/67 in accordance with APM AQ-1.

# ATTACHMENT B Notices to Proceed

NTP No.	Date Issued	Description	Conditions Included (Y/N)	
CPUC - 001	June 14, 2018	Construction activities at select locations along the Bogue Sub-Line Segment, the Pease Sub-Line Segment, and the South of Palermo Line.	Y	
CPUC - 002	September 6, 2018	Construction activities which would take place concurrently with work covered under NTP-1 at select locations along the Bogue Sub Line Segment, the Pease Sub Line Segment, and the South of Palermo Line.	Y	

# ATTACHMENT C Minor Project Refinement Request

Minor Project Refinement Request No.	Submitted	Description	Status	Approval
001	July 09, 2018	Requested to add an approximately 400-by-600 foot landing zone/pull site along the Pease Sub-Line Segment and also the relocation of an approximately 200-by-200 foot landing zone along the Bogue Sub-Line Segment.	Approved	07/19/18