	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 025** **September 3, 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 August 21 through September 3, 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 Lines (TL) 625B, 6931, and 682, and Staging Yards. Geotechnical activities occurring along Circuit (C) 440 were also observed. 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

During this reporting period, CPUC ECMs observed implementation of dust control measures along the project right-of-ways, including use of water trucks to control dust along access roads, pole replacement

workspaces, and staging areas (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, and a street sweeper was observed being utilized on paved public roadways in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1, APM HYD-09, and MM BIO-7).

During this reporting period, along TL 682 construction crews were observed clearing vegetation, installing SWPPP Best Management Practices (BMPs) and installing exclusion barrier fencing for Stephen's kanagroo rat (SKR) at work sites (See Attachment A—Photo 1), conducting drilling activities for micropile foundations (See Attachment A – Photo 2), and conducting helicopter operations (See Attachment A—Photo 3). Helicopter external load operations and human external load operations supporting drilling and overhead transmission line work along TL 682 were conducted in accordance with the Aviation Safety Plan (MM PHS-5) and in accordance with the Avian Protection Plan/Nesting Bird Management Plan (MM BIO-28) as avian biologists and biological monitors were observed monitoring an active nest adjacent to external load operations to assist in site mobilization for drilling (See Attachment A—Photo 4). During all activities, crews were observed adhering to the delineated work limits and working only within existing access roads and delineated work spaces (MM BIO-1), and in accordance with MM BIO-3 and MM BIO-22 biological monitors were observed conducting full time monitoring of initial ground-disturbing activities such as vegetation clearing and monitoring other work activities to ensure compliance with mitigation measures and applicable plans and permits. Arroyo toad exclusionary fencing remained in place at TL 682 between poles Z117172 and Z118180 in accordance with the Streambed Alteration Agreement and at the recommendation of the authorized arroyo toad biologist. Environmentally Sensitive Area (ESA) fencing was observed between delineated workspaces and access roads along TL 682 (MM BIO-16). Cultural resource monitors, including archaeological and native American monitors, were observed monitoring construction activities within the vicinity of previously recorded cultural resources in accordance with MM CUL-1. Cultural resource monitors were observed spot checking cultural ESA fencing installed to prevent unauthorized access into areas with previously recorded cultural resources in accordance with the Historic Properties Management Plan (HPMP).

Along C440, geotechnical was observed being conducted in accordance with mitigation measures. During geotechnical boring biological monitors cultural resource monitors including archaeological and native American monitors, and fire patrols were observed on site in accordance with MM BIO-3, MM BIO-22, MM CUL-1, the Historic Properties Management Plan (HPMP), and the Construction Fire Prevention/ Protection Plan (CFPPP) (MM FF-1) (See Attachment A – Photo 5).

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). 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/equipment being used as stipulated in the Fire Prevention Matrices CFPPP (MM FF-1, APM HAZ-01) (See Attachment A—Photo 6).

Site specific erosion and sediment control BMPs were observed being implemented in accordance with the project SWPPP. BMPs designed to prevent off-site erosion and sedimentation included the use of fiber rolls, silt fencing, and prowattle. On August 30, the on-site biological monitor at Z118151 (TL 682) informed the CPUC Environmental Compliance Monitor (ECM) that groundwater had been encountered during drilling, and that the construction crew was advised on how to address the issue to remain in compliance with mitigation (i.e. keep water from flowing offsite, collecting the water and using for dust control etc.). The on-site monitor also communicated to the CPUC ECM that a gap between the ground and the silt fence was identified at Pole Z118141 and the crew was instructed to repair the silt fence by eliminating the gap. At Pole Z118164 the CPUC ECM informed the project's LEI that a wooden block and a drill platform leg had been set down on the installed erosion control BMP on the downslope perimeter of the site and the LEI committed to addressing the issue within the work day.

Implementation of traffic control measures continued to be observed this reporting period. Traffic control measures, such as placement of signage and cones as well as the use of flagpersons to direct traffic along were implemented in accordance with APM TRANS-02, specifically along Pala Road to temporarily stop traffic during equipment delivery to pole sites along TL 682, and along Sunrise Highway during geotechnical activities along C 440.

In accordance with APM VIS-02, construction activities were observed being kept as clean and inconspicuous as possible and opaque mesh used as a visual screen was observed in good condition around the perimeter of staging areas.

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 observed or reported.

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 maintained erosion control Best Management Practices (BMPs); conducted grading and trenching; installed the drainage feature at road-widening location;

performed overhead conductor work; and removed old poles. The estimated completion date is September 2017. Approximately 95% complete.

TL 629E

During this reporting period, construction crews maintained erosion control BMPs. The estimated completion date is September 2017. Approximately 90% complete.

TL 6931

During this reporting period, construction crews maintained erosion control BMPs; drilled and grouted foundations; assembled and installed poles; removed old poles; and conducted overhead work. The estimated completion date is September 2017. Approximately 45% complete.

TL 682

During this reporting period, construction crews continued development of the Warner Substation Staging Yard; cleared work areas; installed erosion control BMPs; drilled and grouted foundations; installed poles; conducted overhead work; and installed Stephens' kangaroo rat exclusion barrier around poles near the Warner Springs Substation. The estimated completion date is November 2018. Approximately 2% complete with construction.

C 440

During this reporting period, crews completed geotechnical activities.

C 449

During this reporting period, crews completed geotechnical activities.

ATTACHMENT A
Photos

Photo 1: A crew observed installing fiber rolls (sediment control BMP) at Z210619 in accordance with the SWPPP, MM HYD-1, APM HYD-09, and MM BIO-7. The crew worked within the Stephens' kangaroo rat exclusion fence in accordance with MM BIO-31. Fire tools were observed on site in accordance with the CFPPP (MM FF-1).

Photo 2: A construction crew was observed conducting micropile activities at Pole Z118168 (TL 682).

Photo 3: Along TL 682, longlines were utilized for equipment transport to pole sites and crews were observed scouting tree clearances from pole tops and relaying monitoring needs to staff below (Pole Z118148, above).

Photo 4: In accordance with the Avian Protection Plan/Nesting Bird Management Plan (MM BIO-28), an avian biologist and biological monitor were observed monitoring an active passerine nest 60 feet west of Pole Z118146 (TL 682), where a construction crew was conducting helicopter external load operations to assist in site mobilization for drilling.

Photo 5: During geotechnical boring at B14 (C440), a biological monitor was observed on-site in accordance with MM BIO-3 and MM BIO-22, and a fire patrol was present in accordance with the CFPPP (MM FF-1).

Photo 6: During preparation for wire stringing at the Z44294 stringing site (TL 6931), a fire patrol was observed inspecting the site in accordance with the CFPPP (MM FF-1).

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-006	August 23, 2017	Geotechnical activities associated with TL 682 Phase II: Rincon Substation to Pole Z118064	Y
CPUC-007	August 15, 2017	Construction activities associated with C78	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
008	8/14/17	Mendenhall Fly Yard (TL 682)	Approved	9/1/17