	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 032** **December 10, 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 November 27 through December 10, 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) 682 and 629E, 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, construction activities observed by Dudek third party ECMs included setting direct bury steel poles (See Photo 1 – Attachment A), trenching and installing ground rods (See

Photo 2 – Attachment A), drilling pole holes (See Photo 3 – Attachment A), trimming vegetation and grading/repairing existing access roads (See Photo 4 – Attachment A), and preparing poles and drilling equipment for helicopter transport at Corte Madera Staging Yard. Along TL 682, crews were observed drilling pole holes (See Photo 5 – Attachment A), trenching and installing ground rods, digging anchor holes, conducting wire stringing activities, mobilizing equipment for helicopter transport at Love Valley Staging Yard, and drilling for micropiles. Along TL 629E, construction crews were observed splicing a 69 kV underground transmission line near Crestwood Substation and the underground crossing of Old Highway 80 (See Photo 6 – 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 (See Photo 4 – Attachment A), 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 construction activities, crews were observed working within delineated work limits and remaining on existing access roads in accordance with MM BIO-1 (See Photo 3 – Attachment A). 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.

Cultural resource monitors, including Archaeological and Native American monitors, were observed monitoring ground disturbing activities, such as trenching associated with ground rod installation, and inspecting excavated soils for potential sensitive cultural resources along TL 682 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, a Paleontological Monitor was observed monitoring pole hole drilling activities along C 442 in accordance with APM CUL-08. Cultural resources ESAs were fenced off along TL 682 and C 442 to prevent unauthorized access into areas with previously recorded cultural resources.

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). 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) (See Photo 2 – Attachment A). In addition, a set of fire tools (5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) and 100 gallons of water with a pump and hose was observed on site for activities that required it. This includes access road grading near Pole P176969 (C 442) and trenching for ground rod installation at Pole P177017 (C 442) and Poles Z118011 and Z118015 (TL 682).

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 (See Photo 1 – Attachment A). Tracking control BMPs designed to prevent offsite dirt and mud tracking onto public roadways included the use of rock aprons at entrances to project access roads 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. During this reporting period, hazardous waste barrels at Nursery Staging Yard (TL 682) were observed to be labeled and staged on secondary containment pallets in accordance with the SWPPP.

In accordance with APM TRANS-02, implementation of traffic control measures continued to be observed 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 during wire stringing activities across Highway 79 and during work occurring adjacent to Highway 76 (TL 682), along Corte Madera Road to prevent congestion on the one-lane road (C 442), and near Crestwood Substation along Old Highway 80 (TL 629E) (See Photo 6 – Attachment A).

In accordance with APM VIS-02, construction activities were kept as clean and inconspicuous as possible. Specifically, opaque mesh screening material was observed around the perimeter of Corte Madera Staging Yard.

On November 28, the Lead Environmental Inspector notified the third party ECM that the Arroyo Toad Biologist had visited TL 682 and been informed of the upcoming construction schedule so that appropriate monitoring and minimization measures can be implemented during construction activities near Arroyo Toad habitat, in accordance with the Streambed Alteration Agreement.

No construction activities occurred along all rights-of-way from December 4 through December 10, 2017 due to a National Weather Service issued Red Flag Warning.

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

During this reporting period, construction crews conducted punch-list work and site cleanup. The estimated completion date is December 2017. 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 December 2017. 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, and inspected 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. The estimated completion date is January 2018. Approximately 40% complete.

C 442

During this reporting period, construction crews cleared workspaces and installed erosion control BMPs, dug pole holes, installed poles, trimmed trees, and installed Environmentally Sensitive Area (ESA) signs. The estimated completion date is February 2018. Approximately 14% complete.

ATTACHMENT A
Photos

Photo 1: A construction crew observed setting a direct bury steel pole (C 442). Fiber rolls were present and functional in accordance with the project's Erosion Control Plan, SWPPP (MM HYD-1, MM BIO-7) and APM HYD-09.

Photo 2: A construction crew observed trenching and installing ground rods at Pole P177017 (C442). The crew was observed staging the required 5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher, along with 100 gallons of water and pump hose (not pictured) in accordance with the Fire Prevention Matrix (off CNF land), CFPPP (MM FF-1 and APM HAZ-01), and APM HAZ-04.

Photo 3: During pole hole drilling at Pole P258121 (C 442), crews remained within the delineated work limits in accordance with MM BIO-1.

Photo 4: During the grading and maintenance of an existing access road between Poles P176961 to P176964 (C 442), a water tender was used to prevent dust emissions in accordance with APM AIR-02.

Photo 5: During pole hole drilling at Pole Z118011 (TL 682), Archaeological and Native American Monitors were observed inspecting excavated soil in accordance with MM CUL-1. A Biological Monitor was also present (not pictured) in accordance with MM BIO-3 and MM BIO-22.

Photo 6: During splicing of the underground transmission line near Crestwood Substation (TL 629E), cones and traffic control flaggers were used in accordance with APM TRANS-02.

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

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