

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 036 February 4, 2018

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 22, 2018 through February 4, 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, Circuits (C) 78, 442, 449, 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 78, construction activities observed by Dudek third party ECMs included pole assembly, setting poles, removing old poles, and stringing and spreading wire. Along C

442, crews were observed clearing vegetation, installing erosion control Best Management Practices (BMPs), chipping vegetation, drilling pole holes, installing ground rods, and installing pole anchors. ECMs also observed helicopter assisted pole setting and backfilling as well as helicopter external load operations at the Corte Madera Staging Yard to assist in pole setting activities. Along C 449, a construction crew was observed conducting geotechnical borings (See Photo 1 – Attachment A). Along TL 682, crews were observed trimming trees, clearing vegetation, installing erosion control BMPs, grouting and drilling pole holes, stringing and spreading wire, deconstructing and removing Stephens' kangaroo rat (SKR; *Dipodomys stephensi*) barriers, conducting helicopter external load operations in assistance of drilling operations, drilling micropile foundations, splicing fiber optic cable, cutting and removing wooden poles, setting a rebar foundation cage, and conducting site cleanup activities.

On January 29, the National Weather service issued a Red Flag Warning for the project area, and work did not occur.

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 construction activities, crews were observed adhering to delineated work limits and working within existing access roads in accordance with MM BIO-1. On January 25, a third party ECM observed that the pole was staged on wooden cribbing outside of the limits of the access road at P176944 (C 442) so as not to block access to other pole sites. The lead biological monitor (BM) stated that a biological and archaeological monitor were on site during the activity and pre-cleared the area prior to allowing the crew to stage the pole there. No damage to sensitive environmental resources occurred.

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 along C 442 were observed to be securely covered or an earthen ramp was constructed (for shallow excavations) in accordance with MM BIO-23 (See Photo 2 – Attachment A). 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, and C 449. No-disturbance buffers were established around active nests and nest sites were monitored while work occurred within the vicinity (See Photo 3 – Attachment A).

During this reporting period, ECMs observed crews removing SKR barriers, along TL 682 (See Photo 4 – Attachment A). The ECM was informed that after barrier removal, additional crews would be conducting site cleanup, BMP removal, and any necessary soil removal and re-contouring.

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 (See Photo 5 – Attachment A). 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. In addition, cultural resources environmental sensitive areas (ESAs) were fenced to prevent unauthorized access into areas with previously recorded cultural resources. On January 26, the on-site BM informed the ECM that pole P172705 (C 78) would not be removed due to its location within a Cultural ESA. Crews let down the wire and removed the arm, but did not remove the pole. Cultural monitors were present for the arm removal, in accordance with MM CUL-1.

During construction activities, construction fire patrols were observed inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) and 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 CFPPP Fire Prevention Matrices. A set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) was observed at active construction sites in accordance with APM HAZ-01 and APM HAZ-04.

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. ECM observed concrete washout and excess concrete captured during grouting at Z118106 (TL 682).

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. During drilling and excavating of pole holes, dirt spoil was covered and fiber rolls were in place (See Photo 5 – 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.

A Level 1 Minor Deviation (APM HAZ-04) was observed on TL 682 on February 2. The ECM observed a PAR crew preparing to remove the old wooden pole at Z118170 without any of the required fire tools within 50 feet. The fire tools were located approximately 150 feet away, down the footpath access trail, in the crew trucks. The project LEI was notified, and subsequently directed the construction crew to place the required fire tools within the required 50 feet, which they then did. The LEI stated that he would address the issue at the next day morning tailboard meeting, along with the SDG&E Fire Coordinator.

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 completed underground terminations, conducted punch-list work, and inspected and maintained erosion control BMPs. The estimated completion date is February 2018. Approximately 99% complete.

TL 682

During this reporting period, construction crews drilled pole holes, grouted and tested micropiles, installed poles with insulators, removed and/or topped poles, performed wire stringing, conducted tree trimming, removed SKR exclusion structures, and inspected and maintained erosion control BMPs. The estimated completion date is November 2018. Approximately 15% complete.

TL 629C Geotechnical Work

During this reporting period, construction crews conducted geotechnical borings, and inspected and maintained BMPs. The estimated completion date is February 2018. Approximately 10% complete.

Circuit (C) 78

During this reporting period, construction crews removed poles, installed poles, conducted overhead work, conducted wire stringing, and inspected and maintained erosion control BMPs. The estimated completion date is February 2018. Approximately 85% complete.

C 442

During this reporting period, construction crews installed poles, anchors, and ground rods, removed poles, drilled pole holes, conducted vegetation clearing, conducted tree trimming, adjusted workspaces, conducted overhead work, maintained access roads, and installed and maintained erosion control BMPs. The estimated completion date is March 2018. Approximately 55% complete.

C 449

During this reporting period, construction crews completed potholing. This work was 100% completed.

ATTACHMENT A Photos



Photo 1: During potholing near P222133 (C 449), a biological monitor, archeological monitor, and Native American monitor were present, in accordance with MM-BIO-03, MM-BIO-22, MM-CUL-3, APM-CUL-04, and the HPMP.

ATTACHMENT A (Continued)



Photo 2: Following drilling at pole P176946 (C 442), the pole hole was securely covered in accordance with MM-BIO-23 and spoils were contained within a tarp in accordance with the Erosion Control Plan.

ATTACHMENT A (Continued)



Photo 3: On January 22, a 500-foot nest buffer was established around a Red-tailed hawk nest near pole P176950 (C 442) in accordance with the Avian Protection Plan/Nesting Bird Management Plan and MM BIO-23.

ATTACHMENT A (Continued)



Photo 4: An Icon crew observed deconstructing and removing SKR exclusion barrier at Z118190 (TL 682).

ATTACHMENT A (Continued)



Photo 5: Biological and archeological monitors were observed monitoring the grouting activity at pole Z118106 (TL 682).

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
CPUC-011	January 24, 2018	Request to implement geotechnical investigation program, which includes geotechnical borings along TL629C	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
011	1/9/18	Modifications to TL 6957 (formerly TL 625D)	Pending	
012	1/22/18	Request for an additional staging/fly yard (Creekside Ranch Staging and Fly Yard)	Pending	