

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

Cleveland National Forest Power Line Replacement Projects

Compliance Status Report: 010

February 5, 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 January 23 through February 5, 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 and 629E and Staging 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, and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

Implementation Actions

TL 625B

Activities occurring along TL 625B this reporting period included perimeter fence repair at the Japatul Spur Yard, installation and maintenance of erosion control best management practices (BMP) per the Erosion Control Plan (ECP) and Storm Water Pollution Prevention Plan (SWPPP) (APM HYD-05, MM BIO-7, and MM HYD-1), clearing and/or trimming of vegetation within approved work areas, and micropile foundation construction activities including platform and drill setup, and drilling. Helicopters were used to aid in wire rolling and to deliver equipment to areas inaccessible by vehicle.

Heavy rain and wind occurred during this reporting period, resulting in extensive BMPs repairs along roads and work spaces within the rights-of-way. At the Japatul Spur Yard, gravel bag berms and velocity dissipaters were used in accordance with the SWPPP to slow the rate of water flow through the yard. Due to the wind and water flow, the visual screening fence installed along the perimeter of the yard was damaged and observed repaired during the reporting period in accordance with APM VIS-02 (See Photo 1—Attachment A).

During activities, work limits were observed clearly delineated and being adhered to by crews per MM BIO-1 and pre-determined access roads, including footpaths (where vehicular access was infeasible) were observed signed and maintained in accordance with MM BIO-22. Prior to vegetation removal biological monitors were observed sweeping areas in accordance with MM BIO-3 and were observed present during vegetation removal activities (See Photo 2—Attachment A). Environmentally Sensitive Areas (ESAs) were observed delineated (flagged/roped) and avoided in accordance with MM BIO-13, 14, and 16, APM CUL-03, and the Historic Properties Management Plan (HPMP) (MM CUL-1). Fire patrols were observed monitoring micropile foundation activities in accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1) (See Photo 3—Attachment A) and construction crews were observed carrying a five-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher within 50 feet of the vegetation chipping activities. Crews were observed implementing traffic control measures such as the use of flag persons and cones along access roads during micropile foundation construction activities in accordance with APM TRANS-02 (See Photo 4—Attachment A). Traffic control measures were also implemented during helicopter operations supporting equipment staging and wire rolling. Prior to the workday, all personnel were made aware of helicopter operations and safety measures being implemented (MM PHS-5).

<u>TL 629E</u>

During this reporting period, micropile foundation activity continued, which included drill set up, platform set up, drilling, foundation bar installation, capping, grouting, micropile strength testing, and grounding. Steel replacement poles were staged, assembled, and installed. Wire stringing occurred and included wire pulling, sagging, clipping, stacking, and dead-ending (See Photos 5 and 6—Attachment A).

Access roads were observed signed and maintained in accordance with MM BIO-22, and posted with approved project speed limits in accordance with APM AIR-03 and MM BIO-24. Rumble plates installed at construction entrances/intersection of paved and unpaved roads (such as La Posta Road, entrances to established staging yards, etc.) were observed being kept clear of debris and street-sweeping vehicles

and/or street sweepers were observed clearing remnant sediment track-out from paved roadways in accordance with APM AIR-05 and the project SWPPP. Crews were observed inspecting and repairing BMPs throughout the rights-of-way and road easements, including repairing silt fencing, fiber rolls, and water bars. The access road traversing the CNF between poles Z44162 and Z44163 adjacent to the Border Patrol station was observed being smoothed and water bars being repaired. Where groundwater was observed being encountered during micropile foundation drilling activities, sump pumps, sediment rotary tank systems, and filtration bags were observed being deployed accordance with APM HYD-08.

Biological monitors were observed conducting pre-construction sweeps and monitoring during micropile foundation construction activities (MM BIO-22). Work limits were observed delineated and being adhered to by construction personnel (MM BIO-1). As part of weekly reporting (MM BIO-22) SDG&E reported on pre-construction survey efforts, nesting observations, and coordination with the USFWS and CDFW in accordance with the Nesting Bird Management Plan (MM BIO-28). During inspections of other work areas along TL 629E, protective measures for arroyo toad (*Anaxyrus californicus*) were observed damaged by the rain event and subsequently repaired in accordance with the Streambed Alteration Agreement. ESA signage for other sensitive areas was observed in place per MM BIO-13, 14, and 16. Topsoil that was previously salvaged was observed stockpiled along the edge of the work area and secured with erosion and sediment controls (such as natural fiber covering and fiber rolls per the SWPPP) in order to minimize sediment transport and to ensure topsoil was preserved for future restoration efforts in accordance with MM BIO-4 and the Habitat Restoration Plan.

During foundation installation activities crews were observed carrying required fire equipment in vehicles and staging required tools adjacent to work areas, and fire patrols were observed along the project alignment in accordance with the CFPPP. Drip pans and absorbent materials were observed under staged equipment in order to minimize the potential for soil staining in accordance with the SWPPP. Spill kits were observed staged adjacent to work areas and hazardous materials were observed stored at the staging yards in accordance with MM PHS-2.

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 monitors observed overall compliance with mitigation measures throughout the reporting period.

SDG&E reported a Level 1 Minor Deviation (MM PHS-2) that occurred on January 25. The SDG&E Environmental Inspector/Biological Monitor (EI/BM) on site observed that there were absorbent pads

soiled with hydraulic fluid within the designated trash bag at Pole Z40589 (TL 625B). Per MM PHS-2, proper storage of hazardous waste, including "not placing incompatible waste streams into the same container" is required. The EI/BM notified the crew on site and requested that the pads be separated out of the trash and placed in the designated plastic bag containing only soiled absorbent pads, which was verified to be completed by SDG&E.

On January 31, 2016, during vegetation chipping at Pole Z272898 (TL 625B), the CPUC ECM observed a Level 1 Minor Deviation (MM FF-1), as the construction crew did not have 100 gallons of water with a pump and hose on site, as required by the fire prevention matrix (off CNF land) for an FPI of Normal (crews did, however, have all other fire tools required for the chipping activity staged on site, including a 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher). The CPUC ECM immediately notified the on-site biological monitor, who communicated with the crew about the issue, and stopped the chipping activity until the crew obtained the required fire prevention equipment. The SDG&E fire coordinator discussed the observation and immediate response action with the CPUC ECM. After obtaining the fire safety equipment required for chipping, the construction crew resumed work on site.

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.

<u>TL 625B</u>

During this reporting period, crews conducted fence repair at the Japatul Spur Yard, installed and maintained erosion control BMPs, cleared and/or trimmed vegetation within approved work areas, conducted drill platform setup, drill setup, and drilling activities for micropile foundations, and utilized helicopters for rolling wires and delivering equipment to areas inaccessible by vehicle. The estimated completion date is May 2017. Approximately 5% complete.

<u>TL 629E</u>

During this reporting period micro pile foundation activity continued, which included drill platform set up, drill set up, drilling, installing foundation bar, capping, grouting, strength testing, and grounding. Poles were staged, assembled, and installed. Overhead wire work occurred including pulling, sagging, clipping, stacking and dead-ending wires. The estimated completion date is April 2017. Approximately 60% complete.

ATTACHMENT A Photos



Photo 1: Due to the rain event that occurred this reporting period, velocity dissipaters and other erosion control BMPs were used to slow the rate of water flow at the Japatul Spur Yard in accordance with the SWPPP (MM HYD-1). Post-rain event, visual screening fence was observed repaired in accordance with APM VIS-02.



Photo 2: A construction crew was observed clearing vegetation within the approved workspace at Pole Z272870 (TL 625B) in accordance with MM BIO-1. A biological monitor was on site to monitor the activity in accordance with MM BIO-3.



Photo 3: A fire patrol was observed monitoring a crew setting up to drill at Pole Z272879 (TL 625B) in accordance with MM FF-1.



Photo 4: During micropile drilling at Pole Z272901 (TL 625B), a traffic control flagmen and cones were observed in place adjacent to the construction site along Japatul Road in accordance with APM TRANS- 02. Fiber Rolls were observed in place in accordance with the Erosion Control Plan (ECP) and SWPPP (MM HYD-1).



Photo 5: A line crew was observed dead-ending overhead wire at Pole Z44178 (TL 629E).



Photo 6: A construction crew was observed installing a steel replacement pole at Pole Z44168 (TL 629E). Vehicles were observed staged within existing access roads.

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	

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