

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

**Cleveland National Forest Power Line Replacement Projects** 

**Compliance Status Report: 057** 

November 25, 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 November 12, 2018 through November 25, 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 Lines (TL) 629C, 682, 6957 (formerly TL625D), Circuit (C) 157, 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.

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#### Implementation Actions

During this reporting period at TL 629C, CPUC ECMs observed construction crews mobilizing equipment and setting up drill platforms; drilling (See Photo 1 – Attachment A), setting rebar, grouting, and prooftesting for micropile foundations; trenching and installing grounding (See Photo 2 – Attachment A); grading an access road; clearing vegetation (See Photo 3 – Attachment A); conducting helicopter operations; spreading transmission and distribution lines; and framing and installing new steel poles (See Photo 4 – Attachment A). At TL 6957, crews were observed staging equipment in preparation for wire stringing operations and installing a temporary guy wire. At TL 682, crews were observed removing old wooden poles and extracting pole butts, and conducting helicopter external load operations in assistance of those activities (See Photo 5 – Attachment A). At C 157, crews were observed assembling and framing poles (See Photo 6 – Attachment A), installing poles, and conducting helicopter operations assisting in pole installation.

To reduce fugitive dust emissions, CPUC ECMs observed construction crews watering staging yards, access roads, and workspaces in accordance with APM AIR-02. Project personnel were observed obeying the 15 mph project speed limit when traveling on unpaved roads in accordance with APM AIR-03. Crews were observed watering during trenching and access road grading work, and utilizing cuttings containment boxes during micropile drilling to reduce dust emission in accordance with APM AIR-05. To reduce dust emissions from helicopter rotor wash, crews were observed watering pole replacement workspaces in preparation for helicopter external load operations and watering fly yards/designated helicopter landing areas in accordance with the Aviation Safety Plan (ASP) (MM PHS-5).

To prevent unauthorized impacts to biological resources, approved workspaces were clearly delineated with staking and flagging, and crews were observed respecting workspace boundaries in accordance with MM BIO-1. Biological monitors (BMs) were present on site for vegetation clearing work in accordance with MM BIO-3 (See Photo 3 – Attachment A), and were observed communicating with the clearing crews to ensure the workspace limits were understood prior to allowing work to start. BMs were also observed conducting general environmental compliance monitoring along project alignments to ensure compliance with all mitigation measures, applicant proposed measures, and permit conditions in accordance with MM BIO-22 (See Photo 2 – Attachment A). To prevent wildlife entrapment, trenches were sloped to allow wildlife egress, and direct-bury pole holes were securely covered in accordance with MM BIO-23. To prevent attracting wildlife and littering, trash was contained and removed from sites daily in accordance with MM BIO-26.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities, and Environmentally Sensitive Areas (ESAs) were marked to prevent unauthorized access into areas with previously recorded cultural resources in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, APM CUL-04, and APM CUL-05 (See Photo 2 – Attachment A).

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In accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1), dedicated fire patrols were observed inspecting areas of active construction along the project alignments to ensure fire compliance and safety, and crews were observed staging complete sets of fire tools (i.e. 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) within 50 feet of work activities (See Photo 1 – Attachment A). Project activities were observed complying with activity-specific CFPPP fire prevention matrix stipulations for work on and off the CNF based on the day's stated fire conditions.

To prevent leaks and spills from being discharged into the soil in accordance with the Spill Response and Notification Plan (SRNP) and MM PHS-2, crews were observed implementing spill prevention Best Management Practices (BMPs) such as the use of double-walled fuel tanks, the carrying of stocked spill kits (See Photo 6 – Attachment A), and the use of drip pans beneath staged equipment, fuel cans, generators, and pumps. Hazardous waste was properly stored over containment pallets in a designated hazardous waste staging areas (in yards), and barrels containing waste were labeled in accordance with the SPNP and MM PHS-2. In addition, pop-up containment was observed beneath trailers holding fuel tanks in designated helicopter staging areas in accordance with the ASP and MM PHS-5.

In accordance with the project Erosion Control Plan (ECP) and Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1, MM BIO-7) and APM HYD-09, site- specific sediment and erosion control BMPs were observed being implemented along project alignments. Fiber rolls and silt fencing were observed being maintained along rights-of-way (See Photo 1 – Attachment A), and soil stockpiles were covered to prevent erosion. Groundwater containment systems were utilized to prevent silt runoff during micropile drilling along TL 629C. During micropile grouting operations, concrete waste was managed and excess concrete was not discharged onto the ground in accordance with APM HYD-01.

Traffic control measures were observed being implemented along Highway 76 (TL 682), Lyons Valley Road (TL 6957), and Old Highway 80, Buckman Springs Road, and Old Buckman Springs Road (TL 629C) in accordance with APM TRANS-02. Signage and cones were used for shoulder closers, and flaggers were utilized to temporarily hold traffic when needed, or when helicopter operations crossed or occurred next to public roadways.

In accordance with APM VIS-02, construction sites were kept as clean and inconspicuous as possible, and opaque screening was present around staging yards. New poles observed being installed were reddish-brown in color and weathered-steel in accordance with APM VIS-05, and newly installed conduit was non-specular in accordance with APM VIS-03.

#### 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

No non-compliances occurred 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 inspected and maintained sediment and erosion control BMPs. The estimated completion date is December 2018. Approximately 99% complete.

#### TL 629C

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, cleared vegetation from delineated workspaces, mobilized equipment, drilled for, installed, and grouted micropiles, excavated direct-bury foundation and anchor holes, assembled and framed poles, installed poles, installed grounding rods, and conducted overhead work. The estimated completion date is March 2019. Approximately 30% complete.

#### TL 629E

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs. The estimated completion date is December 2018. Approximately 99% complete.

#### TL 682

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work, installed poles, and removed old wooden poles. The estimated completion date is May 2019. Approximately 75% complete.

#### TL 6957

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work, drilled for, installed, and grouted micropiles, installed grounding rods, removed old poles, and conducted access road maintenance. The estimated completion date is February 2019. Approximately 62% complete.

#### C 157

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, assembled and framed poles, installed poles, installed marker balls, and conducted overhead work. The estimated completion date is January 2019. Approximately 55% complete.

#### C 449

During this reporting period, surveyors staked delineated workspaces. The estimated completion date is August 2019. Approximately 0% complete.



## ATTACHMENT A Photos



**Photo 1:** During micropile foundation drilling at Pole Z100047 (TL 629C), a Dedicated Fire Patrol was present on-site in accordance with the CFPPP fire prevention matrix for foundation drilling on CNF land with a PAL of Ev. The designated fire patrol was equipped with 150 gallons of water for fire fighting (with a pump and hose), and a full set of fire tools (i.e. 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) were observed within 50 feet of work activities. The designated fire patrol was also observed regularly wetting down the surrounding area for fire prevention. In addition, fiber rolls were observed to be functional in accordance with the ECP and SWPPP.



**Photo 2:** During trenching for the installation of grounding wire and rods at Pole Z100051 (TL 629C), archeological and cultural monitors were present for the ground disturbing activity, and the boundaries of a cultural ESA surrounding the work space were respected in accordance with the HPMP, MM CUL-1, APM CUL-03, APM CUL-04, and APM CUL-05. In addition, a biological monitor was observed conducting a general environmental compliance site inspection in accordance with MM BIO-22.



**Photo 3:** During vegetation removal activities to prepare the site at Pole Z40424 (TL 629C) for construction, a biological monitor was present in accordance with MM BIO-3. A complete set of fire tools was also observed within 50 feet of the activity in accordance with the CFPPP fire prevention matrix for vegetation clearing work on CNF land with a PAL of C.



**Photo 4:** During pole installation at Pole Z40553 (TL 629C), traffic control personnel were observed safely flagging motorists around equipment staged within the south bound lane of Old Highway 80 in accordance with APM TRANS-02.



**Photo 5:** During old wooden pole removal at Pole Z118109 (TL 682), helicopter external load operations were observed being utilized in accordance with the ASP and MM PHS-5.



**Photo 6:** During pole assembly and framing at Swat Staging Yard (C 157), a spill kit was observed in a crew truck for potential spill cleanups in accordance with the SRNP and MM PHS-2.

## **ATTACHMENT B Notices to Proceed**

| NTP No.       | Date Issued  | Description   | Conditions Included (Y/N) |  |
|---------------|--|---|---------------------------|--|
| CPUC –<br>001 | September 21,<br>2016, updated<br>October 31, 2016 | Construction activities associated with TL 625B and TL 629E   | Y                         |  |
| CPUC-002      | March 15, 2017                                     | Construction activities associated with TL 6931   | Υ                         |  |
| CPUC-003      | March 24, 2017                                     | Geotechnical activities associated with TL 682  | Υ                         |  |
| 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   | Υ                         |  |
| CPUC-007      | August 15, 2017                                    | Construction activities associated with C78   | Υ                         |  |
| CPUC-008      | November 8,<br>2017                                | Construction activities associated with C442  | Y                         |  |
| CPUC-009      | December 12,<br>2017                               | Geotechnical borings and seismic surveys along TL 629A and TL 625D  | Y                         |  |
| CPUC-010      | December 18,<br>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                         |  |
| CPUC-012      | January 9, 2018                                    | Reconstruct TL 6957 (formerly referred to as 625D)  | Υ                         |  |
| CPUC-013      | April 5, 2018                                      | Reconstruct TL 682 Phase III  | Υ                         |  |
| CPUC-014      | June 26, 2018                                      | Reconstruct/Relocate C157   | Υ                         |  |
| CPUC-015      | August 30, 2018                                    | Request to begin construction on C 449  | Y                         |  |
| CPUC-016      | July 10, 2018                                      | Geotechnical Activities associated with TL 6923 and TL 625C   | Y                         |  |
| CPUC-017      | August 30, 2018                                    | Request to being construction on TL 629C  | Y                         |  |
| CPUC-018      | August 15, 2018                                    | Request to implement a geotechnical investigation program, including geotechnical borings, along C 79A.   | Y                         |  |

### ATTACHMENT C Minor Project Refinement Request

| Minor<br>Project<br>Refinement<br>Request | Cultura itta d            | Description  | Chahua                    | Amazaral                 |
|---|---------------------------|--|---------------------------|--------------------------|
| <b>No.</b> 001                            | <b>Submitted</b> 10/5/16, | Description  Request for Modifications to the Anderson, Merrigan and Japatul Spur                        | Status                    | <b>Approval</b> 10/21/16 |
| 001                                       | Revised<br>10/18/16       | Staging Yards  | Approved                  | 10/21/10                 |
| 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)  | Approved                  | 3/12/18                  |
| 012                                       | 1/22/18                   | Request for an additional staging/fly yard (Creekside Ranch Staging and Fly Yard)                        | Approved                  | 2/6/18                   |
| 013                                       | 2/7/18                    | Request to move Pole P178040, per permittee request  | Approved                  | 2/9/18                   |
| 014                                       | 2/15/18                   | Request to begin construction on Phase III of TL682. This request is combined with NTP #13.              | Approved                  | 4/5/18                   |
| 015                                       | 2/22/18                   | Request to move a pole, per permittee request and additional pole work outside of the Rincon Substation. | Approved                  | 3/14/18                  |
| 016                                       | 3/29/18                   | Refinements to TL 629E   | Approved                  | 4/3/18                   |
| 017                                       | 4/12/18                   | Refinements to C157  | Approved                  | 6/26/18                  |
| 018                                       | 5/29/18                   | Refinements to C 449   | Approved                  | 8/30/18                  |
| 019                                       | 7/2/18                    | Refinements to TL 629C   | Approved                  | 8/30/18                  |
| 020                                       | 8/23/18                   | Request for road maintenance and temporary access and pole workspaces along C 157                        | Approved                  | 8/29/18                  |
| 021                                       | 8/23/18                   | Interset Pole on TL 682  | Approved                  | 9/24/18                  |