

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i></p>
	<p>Cleveland National Forest Power Line Replacement Projects</p> <p>Compliance Status Report: 068</p> <p>May 5, 2019</p>

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 April 22, 2019 through May 5, 2019.

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) 6958 (formerly TL 629D), TL 629A, TL 629C, Circuit (C) 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 at TL 629A, CPUC third-party environmental compliance monitors (ECMs) observed construction crews readying work spaces, which included installing temporary fence and exclusion fence for arroyo toad (*Anaxyrus californicus*), vegetation brushing, installing Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) (such as fiber rolls and silt fencing) at pole site and stringing sites, and trimming trees for workspace clearance along the existing utility alignment. Crews were observed readying the Merrigan Staging Yard expansion area for use, including installing perimeter fence and SWPPP BMPs around the perimeter of the yard, and were observed importing and compacting rock for helicopter landing areas at the yard. Along C 449, ECMs observed construction crews conducting work for the underground portion of the 12kV line including trenching for and installing duct banks, conduit, and communication boxes; conducting hot work (removing welding debris from steel plates); and paving over completed excavation areas along Buckman Springs Road (see Photo 3 – Attachment A). In the trench excavations occurring on Morena Stokes Road, ECMs observed construction crews conducting dewatering activities in accordance with APM HYD-08 (see Photo 4 – Attachment A). Along TL 6958, construction crews were observed performing overhead work at various pole site, which included transferring distribution wire and clipping conductor wire (see Photo 5 – Attachment A). Along TL 629C, construction activities observed by ECMs included access road maintenance, site re-contouring, and removing erosion control BMPs (see Photo 6 – Attachment A).

To prevent fugitive dust emissions during project activities, construction crews were observed watering down unpaved access roads, and staging and fly yards in accordance with APM AIR-02 (see Photo 4 – Attachment A) and sweeping track out from Old Highway 80. Project personnel were observed maintaining posted speeds of 15 miles per hour on unpaved roads in accordance with APM AIR-03 and MM BIO-2. Along TL 629C, a street sweeping machine was observed removing track out from Old Highway 80 at the entrance to Kitchen Creek Staging Yard in accordance with the APM AIR-05 and the SWPPP (MM HYD-1, MM BIO-7).

Approved workspaces were observed delineated with staking and flagging, and work crews were observed adhering to work space limits in accordance with MM BIO-1. In accordance with MM BIO-3 and MM BIO-22, biological monitors were observed conducting full-time monitoring of initial ground-disturbing activities including vegetation clearing and SWPPP BMP installation. Environmentally Sensitive Area (ESA) signage and flagging was observed in place along the right-of-way to prevent impacts to sensitive plant and animal species, such as special status and/or butterfly host plant populations in accordance with MM BIO-14 and MM BIO-16. To prevent wildlife entrapment, trenches and excavation areas were securely covered in accordance with MM BIO-23 and crews were observed containing food-related trash in secured trash bags and cans in work spaces along TL 629A and C449 in accordance with MM BIO-26. ECMs observed construction crews avoiding areas posted as having active nests, and observed approved avian biologists monitoring active nests and surveying, ahead of construction crews in accordance with the Avian Protection Plan/Nesting Bird Management Plan (MM BIO-28).

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring trenching activities occurring within C 449 and monitoring SWPPP BMP removal along TL 629C throughout the reporting period in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (see Photo 6 – Attachment A). In addition, cultural resource ESAs were fenced to prevent unauthorized access into areas with previously recorded cultural resources.

In accordance with the Construction Fire Protection/Prevention Plan (CFPPP) (MM FF-1), all project-related vehicles and equipment were observed carrying the required set of fire tools (including a 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) and these tools were observed within 50 feet of work activities. Designated fire patrols were observed monitoring and wetting areas around hot work activities along C449 accordance with the CFPPP (see Photo 3 – Attachment A).

Crews were observed utilizing drip pans beneath staged wire pulling equipment on TL 6958, chainsaw fuel on TL 629A, and using spill catchment pallets under generators and fuel cans at the Merrigan Staging Yard in order to prevent to prevent leaks and spills from being discharged into the soil in accordance with MM PHS-2.

To prevent impacts to hydrology and water quality, site-specific sediment and erosion control BMPs were observed being implemented and maintained along project alignments in accordance with the project Erosion Control Plan (ECP), SWPPP (MM HYD-1, MM BIO-7) and APM HYD-09. At TL 629A, crews were observed installing straw wattles along the perimeter of the Merrigan Staging Yard expansion and newly established work areas at pole sites (see Photo 2 – Attachment A), as well as silt fencing that in some cases served as exclusion fencing for arroyo toad (see Photo 1 – Attachment A). Crews were observed pumping encountered groundwater along C449 onto an approved discharge area in accordance with APM HYD-08 (see Photo 4 – Attachment A). Visqueen was observed being placed in trench areas along C449 to prevent concrete poured in the trench from entering a stream channel in accordance with the Streambed Alteration Agreement.

Traffic control measures were observed being implemented in accordance with APM TRANS-02 during this reporting period. For example, traffic flaggers were observed directing one-way traffic along River Drive on TL 629A while construction crews trimmed oak trees to provide clearance for work along the power line. On C449, ECMs observed the completion of construction activities within a half-mile radius of Mountain Empire Unified School District between 14:00 and 15:00 in accordance with the Traffic Control Plan (TCP) (APM TRANS-05). Additionally along C 449, traffic was observed to be regulated along Buckman Springs Road to maintain a safe one-way travel lane for motorists during construction activities in accordance with APM TRANS-02 and the TCP.

In accordance with APM VIS-02 and VIS-03, opaque fencing was observed installed around the newly established Merrigan Staging Yard expansion (see Photo 2 – Attachment A).

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

SDG&E self-reported one Level 1 Minor Deviation this reporting period. Overhead crews worked past the allowable work hours on April 23rd which violated MM NOI-4. The allowable hours requirement were reiterated during tailboard meetings.

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

Completion pending final inspection and punch-list items. The estimated completion date is May 2019. Approximately 99% complete.

TL 629A

During this reporting period, construction crews installed sediment and erosion control BMPs, as well as Project access and ESA signs. Additionally, crews removed vegetation and trimmed trees within delineated work areas. The estimated completion date is July 2020. Approximately 1% complete.

TL 629C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, and conducted SWPPP punch-list items and clean-up. The estimated completion date is May 2019. Approximately 98% complete.

TL 629E

Completion pending final inspection and punch-list items. The estimated completion date is May 2019. Approximately 99% complete.

TL 6931

Completion pending final inspection. The estimated completion date is May 2019. Approximately 99% complete.

TL 682

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; conducted overhead work; pole removal; access road maintenance; and punch-list work. The estimated completion date is May 2019. Approximately 92% complete.

TL 6957

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, conducted access road work and punch-list items. Completion pending final inspection. The estimated completion date is May 2019. Approximately 99% complete.

TL 6958

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

C 157

Completion pending final inspection. The estimated completion date is May 2019. Approximately 99% complete.

C 449

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; trenched for undergrounding; installed underground duct banks, conduit, and communication boxes; paved completed excavations; and excavated direct-bury pole and anchor holes. The estimated completion date is August 2019. Approximately 60% complete.

ATTACHMENT A Photos



Photo 1: A construction crew was observed installing silt fence at Pole Z172800 (TL 629A) in accordance with the Erosion Control Plan (MM HYD-1) and was installed under the supervision of the Authorized Biologist per the recommended impact avoidance and minimization measures for the line.

ATTACHMENT A (Continued)



Photo 2: A crew member was observed finishing the installation of BMPs (straw wattles) along the perimeter of Merrigan Staging Yard expansion on TL 629A in accordance with the Erosion Control Plan and SWPPP. Opaque visual screening fencing was observed installed at the Merrigan Staging Yard (TL 629A) in accordance with APM VIS-02.

ATTACHMENT A (Continued)



Photo 3: A dedicated fire patrol was observed wetting down the area surrounding hot work near along C449 and a complete set of fire tools was staged on site (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) in accordance with the CFPPP (MM FF-1).

ATTACHMENT A (Continued)



Photo 4: Groundwater encountered in the ephemeral stream channel near 19+96 was pumped into a water truck and later dispersed onto Morena Stokes Road on C 449 in accordance with APM HYD-08 and MM BIO-1.

ATTACHMENT A (Continued)



Photo 5: A water tender was observed applying water to the access road along TL 6958 to minimize dust emissions in accordance with APM AIR-02.

ATTACHMENT A (Continued)



Photo 6: Archaeological and Cultural Monitors were observed monitoring BMP removal along TL 629C in accordance with the HPMP, APM CUL-04, and MM CUL-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-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
CPUC-012	January 9, 2018	Reconstruct TL 6957 (formerly referred to as 625D)	Y
CPUC-013	April 5, 2018	Reconstruct TL 682 Phase III	Y
CPUC-014	June 26, 2018	Reconstruct/Relocate C157	Y
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
CPUC-019	November 30, 2018	Reconstruction of TL 6958 (formerly referred to as TL629D)	Y
CPUC-020	April 19, 2019	Reconstruction of TL 629A	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)	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	Intersect Pole on TL 682	Approved	9/24/18
022	10/16/18	Refinements to TL 6958 (formerly TL 629D)	Approved	11/30/18
023	11/15/18	Expansion of the Buckman Springs Fly Yard and addition of the Old Buckman Springs Staging Yard and Rodriguez Staging Yard	Approved, with Conditions	12/4/18
024	11/26/18	Request to use the Pacific Crest Trail for access along C 449 and TL 629C	Approved	1/3/19
025	12/11/18	Bartlett Staging Yard	Approved	1/22/19
026	2/22/19	Refinements to TL 629A	Approved	4/19/19
027	3/1/19, Revised 3/8/19	Expansion of the Cameron Staging Yard	Approved	3/12/19
028	3/7/19	Underground workspaces at three existing pole locations on C 449	Approved	3/12/19