

	<b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting</i></b> <b><i>Program</i></b>
	<b>Cleveland National Forest Power Line Replacement</b> <b>Projects</b>  <b>Compliance Status Report: 024</b>  <b>August 20, 2017</b>

## 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 August 7 through August 20, 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, 6931, and 682, and Staging Yards. Geotechnical activities occurring along Circuit (C) 440 were also observed. 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*

During this reporting period, CPUC ECMs observed implementation of dust control measures, including use of water trucks to control dust along access roads, pole replacement workspaces, and staging areas

(APM AIR-02). Water trucks were also observed being utilized to spray water in and around the designated helicopter landing area in Nursery Staging and Fly Yard to prevent potential dust emissions caused by rotor wash in accordance with the Aviation Safety Plan (MM PHS-5). Additionally, 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, and a street sweeper was observed being utilized on paved public roadways such as Tierra del Sol Road in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1, APM HYD-09, and MM BIO-7).

During this reporting period, construction crews were observed setting poles (See Attachment A – Photo 1) and removing old poles along TL 6931, as well as installing underground transmission line to Crestwood Substation along TL 629E/6931. Along TL 682, Crews were observed drilling for micropile foundations, trimming oaks mid-span and within workspaces to maintain required transmission line clearances, clearing vegetation at pole sites, and installing perimeter chain link fence around Warner Substation Staging and Fly Yard. Helicopter external load operations and human external load operation were observed being performed to support drilling and overhead transmission line work along TL 682 in accordance with the Aviation Safety Plan (MM PHS-5). At C 440, Seismic Refraction Testing work was observed being conducted along the underground transmission line right-of-way (See Attachment A – Photo 2).

During all activities, crews were observed adhering to the delineated work limits and working only within existing access roads and delineated work spaces (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 such as vegetation clearing occurring along TL 682, and monitoring other work activities to ensure compliance with mitigation measures and applicable plans and permits. An approved avian biologist was observed surveying for nesting birds ahead of seismic refraction testing along C 440, and surveying for/ monitoring active nests along TL 682 and TL 6931 in accordance with the Avian Protection Plan/Nesting Bird Management Plan (MM BIO-28). Arroyo toad exclusionary fence installed at the recommendation of the authorized arroyo toad biologist, remained in place at TL 682 between poles Z117172 and Z118180 in accordance with the Streambed Alteration Agreement. The authorized biologist was also observed continuing to monitor for arroyo toad at a stream crossing along Fink Road (an approved access road used for heavy equipment transport) to prevent impacts to the species during equipment crossing. Environmentally Sensitive Area (ESA) fencing was observed between delineated workspaces and access road along TL 682 (MM BIO-16) and crews were observed initiating installation of Stephens' kangaroo rat (SKR) exclusion barrier fencing (as well as perimeter fencing) around the Warner Sub Staging and Fly Yard (MM BIO-31) (See Attachment A – Photo 3). At TL 6931, a crew was observed performing succulent salvage at the Z44270 stringing site (See Attachment A – Photo 4). Cactus and agave species that had been previously flagged and avoided during vegetation clearing activities were salvaged and transported to a nearby staging area/nursery so that they may be used in accordance with the Habitat Restoration Plan (MM BIO-4), Special Status Species Salvage and Relocation Plan (MM BIO-15), and California Desert Native Plant Act. On August 11, the CPUC third party ECM observed loose trash concentrated along the perimeter chain-link fence at Live Oak Springs Staging Area near the trash

receptacles. The on-site biological monitor informed the CPUC third party ECM that the trash had been reported, and that it would be picked up as soon as possible in accordance with MM BIO-26.

Cultural resource monitors, including archaeological and native American monitors, were observed monitoring construction activities within the vicinity of previously recorded cultural resources in accordance with MM CUL-1. Cultural resource monitors were observed spot checking cultural ESA fencing installed to prevent unauthorized access into areas with previously recorded cultural resources in accordance with the Historic Properties Management Plan (HPMP) (See Attachment A – Photo 5).

During construction activities along the rights-of-way, construction fire patrols were observed inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1). 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/equipment being used as stipulated in the Fire Prevention Matrices CFPPP (MM FF-1, APM HAZ-01).

Site specific erosion and sediment control BMPs were observed being implemented in accordance with the project SWPPP (MM HYD-1, APM HYD-09, and MM BIO-7). BMPs designed to prevent off-site erosion and sedimentation included the use of fiber rolls, silt fencing, and prowwattle. In addition, dirt stockpiles were watered and/or covered and surrounded with fiber rolls. To prevent dirt/mud from being tracked onto paved or public roadways, rattle plates and rock aprons were in place at the ingress and egress with project access roads and staging yards (See Attachment A – Photo 6) and a street sweeper was utilized when necessary. On August 10, the CPUC third party ECM notified the SDG&E Lead Environmental Inspector (LEI) of a situation where sediment had built up on fiber rolls and breached the erosion and sediment control BMP at Pole Z189136 (TL 6931). The LEI contacted an erosion and sediment control BMP crew, who performed maintenance to the fiber rolls and scooped up excess sediment buildup and overflow that day. To prevent unauthorized leaks/spills from being discharged into the soil, fuel and other hazardous materials were stored in double walled tanks or above secondary containment in accordance with MM PHS-2 and the project SWPPP. In addition, drip pans were observed beneath small fuel canisters, small combustion engines, staged equipment in staging yards, and sanitary facilities.

Implementation of traffic control measures continued to be observed this reporting period. Traffic control measures, such as placement of signage and cones as well as the use of flagpersons to direct traffic along were implemented in accordance with APM TRANS-02, specifically along Pala Road to temporarily stop traffic during equipment delivery to pole sites along TL 682, and along Sunrise Highway during Seismic Refraction Testing along C 440.

In accordance with APM VIS-02, construction activities were observed being kept as clean and inconspicuous as possible and opaque mesh used as a visual screen was observed around the perimeter of staging areas (Attachment A – Photo 6).

### ***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.

During this reporting period, SDG&E reported a non-compliance that occurred August 10 when a survey crew accessed a site (Pole Z118148) to install centerline and alignment staking within a 500 foot setback buffer for a nesting southwest willow flycatcher. The incident violated MM BIO-28, which prohibits activities within 500 feet of active nests for federally and/or state listed birds. An approved avian biologist evaluated the nest the following day, observed an adult feeding nestlings, and determined that there was no apparent failure of the southwest willow flycatcher nest caused by the work.

## **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 maintained erosion control Best Management Practices (BMPs); performed overhead conductor work; and removed old poles. The estimated completion date is August 2017. Approximately 95% complete.

### **TL 629E**

During this reporting period, construction crews maintained erosion control BMPs. The estimated completion date is September 2017. Approximately 90% complete.

### **TL 6931**

During this reporting period, construction crews maintained erosion control BMPs; drilled and grouted foundations; assembled and installed poles; removed old poles; conducted underground work, and salvaged succulents. The estimated completion date is September 2017. Approximately 45% complete.

### **TL 682**

During this reporting period, construction crews continued receiving materials at Orchard Staging Yard; continued development of the Warner Substation Staging Yard; delineated workspaces; cleared work areas; installed erosion control BMPs; drilled foundations; and installed Stephens' kangaroo rat exclusion barrier around pole near the Warner Springs Substation. The estimated completion date is November 2018. Approximately 2% complete with construction, and 50% complete with geotechnical activities.

C 440

During this reporting period, crews performed Seismic Refraction Testing. The estimated completion date is September 2017. Approximately 50% complete with geotechnical activities.

C 449

During this reporting period, crews performed Seismic Refraction Testing. The estimated completion date is September 2017. Approximately 50% complete with geotechnical activities.

## ATTACHMENT A Photos

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**Photo 1:** A construction crew observed installing a new pole at Pole Z44270 (TL 6931).

## ATTACHMENT A (Continued)



**Photo 2:** Seismic Refraction Testing observed being performed at seismic line S12 for the C 440 underground distribution line along Sunrise Highway.

## ATTACHMENT A (Continued)

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**Photo 3:** In accordance with MM BIO-31, a construction crew was observed installing Stephens' kangaroo rat exclusion barrier around the perimeter of Warner Substation Staging Yard (TL 682).



## ATTACHMENT A (Continued)



**Photo 4:** A restoration crew observed salvaging succulents previously avoided during vegetation clearing at the Z44270 stringing site (TL 6931) in accordance with the Habitat Restoration Plan (MM BIO-4), Special Status Species Salvage and Relocation Plan (MM BIO-15), and California Desert Native Plant Act.

## ATTACHMENT A (Continued)



**Photo 5:** Cultural resource ESA fencing installed to prevent unauthorized access into areas with previously recorded cultural resources in accordance with the Historic Properties Management Plan (HPMP) was observed along all project rights-of-way.

## ATTACHMENT A (Continued)



**Photo 6:** In accordance with the SWPPP (MM HYD-1, APM HYD-09, and MM BIO-7), rattle plates and gravel aggregate were installed at the ingress and egress of Orchard Staging Yard (TL 682) to prevent dirt/mud from being tracked onto public roadways. In accordance with APM VIS-02, opaque mesh material was installed around the perimeter of the yard as a visual screening measure.

## ATTACHMENT B Notices to Proceed

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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

## ATTACHMENT C

### Minor Project Refinement Request

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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