

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 026 September 17, 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 September 4 through September 17, 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) 6931, TL 682, and associated 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

During this reporting period, CPUC ECMs observed construction crews conducting overhead work (See Photo 1—Attachment A), conducting distribution pole realignment/relocation activities, setting new

poles, removing old wooden poles, and stringing wire along TL 6931. Along TL 682, crews were observed drilling and grouting for micropile foundations, trimming oaks mid-span to maintain required transmission line clearances, drilling pole holes for conventional foundations and installing direct embed poles, pouring concrete (See Photo 2—Attachment A), clearing vegetation, installing sediment and erosion control Best Management Practices (BMPs), installing Stephens' kangaroo rat exclusion barriers around pole replacement workspaces, setting up k-rail barrier around the perimeter of Mendenhall Fly Yard, and mowing/clearing vegetation at Lake Henshaw Staging Yard.

During construction activities, CPUC ECMs observed implementation of dust control measures, including the use of water trucks to control dust along access roads, pole replacement workspaces, and staging areas (APM AIR-02). On September 8, the CPUC third party ECM notified the SDG&E Lead Environmental Inspector (LEI) of dust observed at Pole Z118173 caused from helicopter rotor wash during an external load pick up. The LEI stated that watering needs and dust mitigation requirements were addressed with crews throughout the week and would remind crews of requirements for minimizing dust during helicopter activities in accordance with the Aviation Safety Plan (MM PHS-5). Dust issues were not observed through the remainder of the reporting period. 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 Highway 79 at TL 682 and Tierra del Sol Road at TL 6931 used to access construction access roads in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1, APM HYD-09, and MM BIO-7).

Crews were observed adhering to the delineated work limits and working only within existing access roads and delineated workspaces (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 and vegetation clearing occurring along TL 682, and monitoring other work activities to ensure compliance with mitigation measures and applicable plans and permits. On September 14, the CPUC ECM observed one biological monitor being utilized to monitor vegetation clearing activities that were occurring simultaneously at consecutive poles along TL 682 (Pole Z118024 and Pole P412832). The SDG&E LEI and CPUC Compliance Manager were notified to discuss the requirements of MM BIO-3, which states that a biological monitor must be present during all initial ground disturbing and vegetation clearing in undeveloped areas. Both the SDG&E LEI and CPUC Compliance Manager agreed that the intent of MM BIO-3 was being met through monitoring methods based on proximity of pole locations.

In accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) (MM BIO-28), an approved avian biologist was observed monitoring an active nest between Pole Z118146 and Pole Z118145 (TL 682) on September 9th during mid-span tree trimming within the required 150 foot nest buffer. The avian biologist informed the CPUC ECM that the tree trimming crew was being allowed to trim oaks within the nest buffer with the use of hand tools only (to reduce noise), and that the nesting birds had not displayed stressed or agitated behavior, consistent with the NBMP. Environmentally Sensitive Area (ESA) fencing was observed in place to protect butterfly host plants in accordance with MM BIO-16 along TL 682. Approved Stephens' kangaroo rat (SKR) biologists were

observed conducting activities along TL 682 in accordance with MM BIO-31, including monitoring construction activities within SKR habitat near Warner Substation, trapping SKR within the exclusion barriers installed around pole sites, flagging SKR burrows along the access road for avoidance, and constructing artificial SKR burrows to be used for the release of SKR trapped within exclusion barriers surrounding pole replacement workspaces (See Photo 3—Attachment A). On September 7, the SDG&E LEI, informed the CPUC ECM that to prevent potential impacts to SKR in burrows, a drilling crew was required to hand dig the first 9-10 inches of a pole hole at Pole Z216457 (TL 682), prior to drilling, while an approved SKR biologist monitored for SKR.

Cultural resource monitors, including archaeological and Native American monitors, were observed monitoring ground disturbing activities such as pole hole drilling/auguring, and inspecting excavated soils for potential sensitive cultural resources in accordance with MM CUL-1 (See Photo 4—Attachment A). In addition, an archeological monitor was observed directing a BMP installation crew to lay perimeter fiber rolls on the ground surface on the downslope side at certain pole locations along TL 682, instead of trenching them into the ground to prevent impacts to potentially buried cultural resources in the area. 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). In accordance with APM CUL-08, a paleontological monitor was observed monitoring pole hole drilling/auguring along TL 682 and inspecting excavated soils for the presence of fossils.

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 prowattle. On September 13th, a biological monitor notified the CPUC ECM that a silt fence was observed in poor condition at Pole Z118147 and that a BMP maintenance crew had been contacted to fix the fence. Dirt stockpiles were observed watered and/or covered and surrounded with fiber rolls. Rattle plates and rock aprons were observed in place at the ingress and egress with project access roads and staging yards to prevent dirt/mud from being tracked onto paved or public roadways, and a street sweeper was observed being utilized when necessary. 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 (See Photo 5—Attachment A). 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 in this reporting period. Traffic control measures, such as the placement of signage and cones as well as the use of flagpersons were observed in accordance with APM TRANS-02. During helicopter external load operations along TL 682, traffic control notification signs, cones, and flagpersons were observed being utilized to temporarily stop traffic when loads were transported over public roads, including Highway 76 and East Grade Road (See Photo 6—Attachment A).

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.

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 Level 1 Minor Deviation that occurred on August 29, but was not observed and reported on by a biological monitor until September 6th. The incident occurred when a helicopter was mobilizing a metal cribbing deck to the work site at Pole Z118145 (TL 682), which caused a coast live oak tree rooted approximately 2.5 feet outside of the delineated workspace to bend and sway, causing a hazard during the operation. To alleviate the hazard, the work crew bent the tree further down into the work area and tied it down so that it would not bend and sway during future helicopter mobilization activities. The incident resulted in the coast live oak being bent at the base, causing it to lean horizontally, and an unauthorized, permanent impact to a biological resource located outside of the delineated work limits in violation of MM BIO-1 (confine construction and construction related activities to the minimum necessary area).

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 BMPs, conducted punch-list work and began site cleanup. The estimated completion date is September 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, conducted overhead work, and removed old poles. The estimated completion date is September 2017. Approximately 45% complete.

TL 682

During this reporting period, construction crews developed Lake Henshaw Staging Yard and Mendenhall Fly Yard, drilled and grouted foundations, installed poles, conducted overhead work, cleared workspaces and installed BMPs, and constructed and maintained Stephens' kangaroo rat exclusion barriers. The estimated completion date is November 2018. Approximately 2% complete with construction, and 50% complete with geotechnical activities.

ATTACHMENT A Photos



Photo 1: A construction crew observed conducting overhead line work in preparation for wire stringing activities at Pole Z44247 (TL 6931).

ATTACHMENT A (Continued)



Photo 2: A construction crew observed pouring concrete during conventional foundation construction at Pole Z118232 (TL 682). Stephens' kangaroo rat exclusion barrier was observed around the perimeter of the workspace in accordance with MM BIO-31.

ATTACHMENT A (Continued)



Photo 3: In accordance with MM BIO-31, Stephens' kangaroo rat avoidance and minimization measures were observed being implemented, and included the use of traps (pictured) within the workspace at Pole Z118234 (TL 682). Trapping within the exclusion barrier is required for five consecutive nights prior to the commencement of construction activities.

ATTACHMENT A (Continued)



Photo 4: At a pole location along TL 682, archeological and Native American monitors were observed monitoring excavated soils for sensitive cultural resources in accordance with MM CUL-1. (9-10 inches of excavation were dug with hand tools to avoid potential impacts to SKR in accordance with MM BIO-31).

ATTACHMENT A (Continued)



Photo 5: At Warner Substation Staging Yard (TL 682), hazardous materials were observed being stored above catchment pallets in accordance with the SWPPP and MM PHS-2.

ATTACHMENT A (Continued)



Photo 6: During helicopter external load operations assisting in transport of materials and equipment used in foundation drilling and grouting along TL 682, traffic control notification signs, cones, and flagpersons were utilized to temporarily stop traffic when loads were transported over Highway 76 (APM TRANS-02).

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-006	August 23, 2017	Geotechnical activities associated with TL 682 Phase II: Rincon Substation to Pole Z118064	Y
CPUC-007	August 15, 2017	Construction activities associated with C78	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
008	8/14/17	Mendenhall Fly Yard (TL 682)	Approved	9/1/17