

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

Cleveland National Forest Power Line Replacement Projects

Compliance Status Report: 028

October 15, 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 October 2 through October 15, 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 Line (TL) 6931, TL 682, Circuit (C) 78, and 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, and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

Implementation Actions

During this reporting period along TL 6931, CPUC ECMs observed construction crews conducting overhead work, maintaining sediment and erosion control Best Management Practices (BMPs), installing grounding rods, maintaining and removing old wooden poles. Along TL 682, CPUC ECMs

observed drilling and grouting for micropile foundations, drilling pole holes/installing direct embed poles, installing ground wire, and beginning the development of the Love Valley Fly Yard and associated access road. Initial development of the Love Valley Fly Yard included vegetation clearing, fence installation, and perimeter BMP installation. Additionally, crews were observed trimming oak trees to maintain required transmission line clearances, clearing vegetation and installing sediment and erosion control BMPs, and maintaining Stephens' kangaroo rat exclusion barrier around pole replacement workspaces. Along C 78, crews were observed clearing vegetation, installing erosion control BMPs, and digging/drilling pole holes.

During this reporting period, CPUC ECMs observed implementation of dust control measures including application of water to control dust on access roads, in pole replacement workspaces, and during ground wire install (APM AIR-02). 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. During drill spoil hauling from sites along TL 682; haul trucks were equipped with load covers to prevent dust emissions in accordance with APM AIR-03.

During construction activities, crews were observed adhering to delineated work limits and working within existing access roads in accordance with MM BIO-1. On October 2, the onsite biological monitor at Z118134 observed that a compressor had been placed approximately 1-2 feet outside of the workspace. The incident was documented in the biological monitor's daily report and no sensitive resources were impacted. In accordance with MM BIO-3 and MM BIO-22, biological monitors were observed conducting full time monitoring of initial ground-disturbing activities as well as vegetation clearing and trimming, which were occurring along TL 682, C 78, and at the Love Valley Fly Yard. To prevent wildlife entrapment along TL 682 and C 78, completed pole holes were observed securely covered in accordance with MM BIO-23 (See Photo 1 – Attachment A). Approved Stephens' kangaroo rat (SKR) biologists were observed monitoring the construction of SKR exclusion barrier at pole replacement sites within SKR habitat along TL 682 (eastern end), trapping SKR within the exclusion barriers installed around pole sites, and flagging SKR burrows along the access road for avoidance in accordance with MM BIO-31. In addition, access road limits were clearly staked to prevent potential impacts to SKR during pole hole drilling (See Photo 2 - Attachment A). CPUC ECMs observed construction crews using trash bags to contain and collect trash at worksites in accordance with MM BIO-26 and BIO-33.

CPUC ECMs documented applied hydro-mulch/hydro-seed in temporary work areas along TL 625B in accordance with the Habitat Restoration Plan (MM BIO-4) as well as the SWPPP and Erosion Control Plan (See Photo 3 – Attachment A).

Cultural resource monitors, including archaeological and Native American monitors, were observed monitoring ground disturbing activities, such as pole hole drilling, and inspecting excavated soils for potential sensitive cultural resources along TL 682 in accordance with MM CUL-1 (See Photo 4 – Attachment A). Unanticipated discoveries were collected and recorded in accordance with the HPMP during this reporting period.

During construction activities along all 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 as allowed in the Fire Prevention Matrices CFPPP (MM FF-1, APM HAZ-01). During brush clearing along the road shoulders of Love Valley Road, a water truck was used to water before and after clearing activities for fire safety in accordance with the CFPPP (See Photo 5 – Attachment A).

Site-specific erosion and sediment control BMPs continued to be observed along the project rights-ofway 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. In addition, dirt stockpiles were watered and/or covered and surrounded with fiber rolls or silt fence (See Photo 1 – Attachment A). At some mountain side pole replacement sites along the TL 682 alignment, rock fence was used in addition to silt fence to provide rock erosion protection and silt fence fortification. CPUC ECMs observed concrete washout containment used at pole foundation pours along TL 682 in accordance with APM-HYD-01. ECMs observed crews installing perimeter fiber rolls at the Love Valley Staging Yard in accordance with the SWPPP and Erosion Control Plan (See Photo 6 – Attachment A). On October 11, a biological monitor informed the CPUC third party ECM that immediate maintenance would be performed at the prowattle BMP at Z118163, which was observed to be overloaded with sediment, but not breached.

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 flag persons were observed in accordance with APM TRANS-02. During helicopter external load operations along TL 682, traffic control notification signs, cones, and flag persons were observed being utilized to temporarily stop traffic when loads were transported over public roads, including Highway 76 and East Grade Road. Signage, cones, and flag person were also utilized along C 78 to direct traffic around construction vehicles and equipment staged on Viejas Grade Road and during pole hole drilling.

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. No non-compliances were reported or observed 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.

<u>TL 625B</u>

During this reporting period, construction crews conducted punch-list work and site cleanup. The estimated completion date is October 2017. Approximately 95% complete.

<u>TL 629E</u>

During this reporting period, construction crews maintained erosion control BMPs, conducted punch-list work, and conducted site cleanup. The estimated completion date is January 2018. Approximately 90% complete.

<u>TL 6931</u>

During this reporting period, construction crews maintained erosion control BMPs, conducted overhead work, installed grounding rods, and removed old poles. The estimated completion date is November 2017. Approximately 85% complete.

<u>TL 682</u>

During this reporting period, construction crews drilled and grouted foundations, installed poles, conducted overhead wire spreading, cleared workspaces and installed BMPs, trimmed trees for overhead work clearance, began the development of the Love Valley Fly Yard and associated access road, and maintained Stephens' kangaroo rat exclusion barriers. Approximately 5% complete with construction, with a completion date of November 2018. Geotechnical activities are 100% complete as of October 2017.

<u>C 78</u>

During this reporting period, construction crews cleared workspaces, installed erosion control BMPs, and dug pole holes. The estimated completion date is December 2017. Approximately 2% complete.

ATTACHMENT A Photos



Photo 1: A completed pole hole was observed at P172688. The hole was covered to prevent wildlife entrapment in accordance with MM BIO-23 and the excavated spoil pile was covered with visqueen and surrounded by silt fence to prevent erosion in accordance with the project SWPPP (C 78).



Photo 2: During pole hole drilling at Pole Z118216 (TL 682), the access road limits were clearly staked to prevent potential impacts to SKR in accordance with MM BIO-31.



Photo 3: Hydro-mulch application at Z272860 (TL 625B) was observed in accordance with the Habitat Restoration Plan and project SWPPP. A biological monitor was present in accordance with MM BIO-3 and MM BIO-22.



Photo 4: Cultural resource monitors were onsite to inspect excavated spoils during pole hole drilling at Z118208 (TL 682) in accordance with MM CUL-1.



Photo 5: During brush clearing along the road shoulders of Love Valley Road, CPUC ECMs observed a water truck spraying vegetation before and after clearing for fire safety in accordance with the CFPPP.



Photo 6: Crews installed perimeter fiber rolls at the Love Valley Staging Yard in accordance with the SWPPP and Erosion Control Plan.

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	

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	Pending	N/A