

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 030 November 12, 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 30 through November 12, 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) 682, Circuit (C) 78, 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 along TL 682, construction activities observed by Dudek third party ECMs included vegetation clearing, installing sediment and erosion control BMPs, installing pole ground wire,

drilling, grouting, trimming rebar, proof testing for micropile foundation construction (See Photo 1 – Attachment A), helicopter external load operations to support micropile foundation drilling and construction, drilling into a concrete foundation to install strength testing equipment, spreading wire, drilling pole holes (See Photo 3 – Attachment A), removing old wooden poles, setting new steel poles (See Photo 2 – Attachment A), and backfilling and pouring concrete. Along C 78, crews were observed excavating/drilling pole holes and anchor sites (See Photo 5 – Attachment A), setting new poles, installing pole anchors, installing disconnects, installing anchors, and stringing rope in preparation for wire stringing (See Photo 6 – Attachment A).

During this reporting period, CPUC ECMs observed implementation of dust control measures including the application of water on access roads and in work areas, in accordance with APM AIR-02, and project personnel maintaining posted speeds of 15 miles per hour on unpaved roads, in accordance with APM AIR-03 and MM BIO-24. In accordance with APM AIR-05, drill cuttings were observed being captured in a containment box during micropile drilling operations to minimize dust emissions. During helicopter external load operations, water was used to prevent dust emissions caused by rotor wash in accordance with the Aviation Safety Plan (MM PHS-5).

During construction activities, crews were observed adhering to delineated work limits and working within existing access roads 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 as well as vegetation clearing. To prevent wildlife entrapment, completed pole holes were observed securely covered in accordance with MM BIO-23. Crews were observed using trash bags to contain and collect trash at worksites in accordance with MM BIO-26. To prevent potential impacts to a nesting bird during micropile rebar trimming at Pole Z118149 (TL 682), nest buffer signage was observed posted along the site footpath access in accordance with Nesting Bird Management Plan (MM BIO-28). During construction activities taking place in Stephens' kangaroo rat (SKR) habitat (east end of TL 682), mitigation and avoidance measures were observed being implemented to prevent impacts to SKR in accordance with MM BIO-31. Observed mitigation and avoidance measures included the use of exclusion barriers around pole replacement sites (See Photo 2 – Attachment A) and Warner Substation Staging Yard as well as monitoring by approved SKR biologists and biological monitors during work activities. On November 3, an SKR biologist was observed trapping SKR outside of an exclusion barrier at Pole 118210 while conducting a study to determine the success of individuals trapped, tagged, and then released in the same area.

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 the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (See Photo 3 – Attachment A). In accordance with the HPMP, cultural resource ESA fencing was observed to prevent unauthorized access into areas with previously recorded cultural resources.

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 Cleveland National Forest (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 and APM HAZ-01). During hot work (welding) conducted at Pole Z118044, a dedicated fire patrol was observed wetting down the surrounding area prior to the hot work and monitoring the activity to ensure fire safety and compliance (See Photo 4 – Attachment A).

Site-specific erosion and sediment control BMPs continued to be observed along the project rights-of-way in accordance with the project SWPPP, MM HYD-1, APM HYD-09, and MM BIO-7. Sediment control BMPs included the use of fiber rolls, silt fencing, and prowattle at pole replacement sites and staging yards (See Photo 1 – Attachment A). On November 3, the CPUC ECM notified the SDG&E Lead Environmental Inspector (LEI) of sediment build up on the prowattle along the eastern perimeter of the site at Pole Z118155 (TL 682). Later in the day, the LEI reported that a BMP maintenance crew removed the sediment load. Tracking control BMPs designed to prevent offsite dirt and mud tracking onto public roadways included the use of rock aprons at entrances to project access roads and staging yards.

To prevent leaks and spills from being discharged into the soil in accordance with the Spill Response and Notification Plan (MM PHS-2), crews were observed implementing spill prevention BMPs which included the use of secondary containment beneath hazardous materials and fuel tanks, double walled fuel tanks, drip pans beneath staged equipment and sanitary facilities, and spill kits. During pole backfill and concrete pouring activities, crews were observed capturing concrete wash and excess concrete in accordance with APM HYD-01. On November 7, the CPUC ECM observed concrete drips/spills along the access road between poles Z118049 and Z118048 (TL 682), and notified the LEI. The CPUC ECM verified that the concrete was cleaned up the following day.

In accordance with APM TRANS-02, 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 during pole setting, anchor drilling and installation, preparation for wire stringing along C 78 and Viejas Grade Road (See Photo 6 – Attachment A), and during helicopter external load operations along TL 682 where work occurred adjacent to Highway 76.

In accordance with APM VIS-01, construction activities were kept as clean and inconspicuous as possible. For visual screening, opaque mesh was observed around the perimeters of staging yards, including Merrigan (C 78), Warner Substation, Nursery, and Orchard (TL 682).

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.

On November 6, SDG&E reported a Level 1 Minor Deviation when dirt spoils overflowed the workspace limits at Pole Z118055 (TL 682) during pole hole drilling, which damaged some vegetation and therefore violated MM BIO-1, which requires that construction related activities are confined to the minimum necessary area.

On November 9, SDG&E reported a Level 1 Minor Deviation when it was discovered that a construction worker was working on the project without having attended the Worker Environmental Awareness Program (WEAP) training. Though the individual was under the direct supervision of trained project personnel and no sensitive resources were impacted, it was a deviation from MM BIO-2, which requires that all project personnel complete the WEAP training.

On November 9, the CPUC ECM reported a Level 1 Minor Deviation when, during grounding installation at pole Z118149 (TL 682), a trench was dug extending four to five feet outside the work limits within an existing, bare footpath that had been previously disturbed. According to the project LEI, biological and cultural monitors had already surveyed the area for sensitive resources and helped plan where the trench was dug. While no impacts to sensitive resources or vegetation were recorded, excavation outside a work area was not identified in the applicable NTP and no Workspace Adjustment was submitted for the area. The CPUC notified SDG&E verbally of the deviation and SDG&E confirmed that corrective action was taken to remind the crews and monitors that any work outside the approved workspaces is not allowed and confirmed that there were no other plans to work outside the approved workspaces.

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 conducted punch-list work and site cleanup. The estimated completion date is November 2017. Approximately 98% complete.

TL 629E

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

TL 6931

During this reporting period, construction crews maintained erosion control BMPs and conducted punch-list work. The estimated completion date is November 2017. Approximately 90% complete.

TL 682

During this reporting period, construction crews cleared workspaces and installed BMPs, drilled foundations, trimmed trees for overhead work clearance, spread conductor, installed poles, and maintained Stephens' kangaroo rat exclusion barriers. Approximately 7% complete with construction, with a completion date of November 2018.

C 78

During this reporting period, construction crews cleared workspaces and installed erosion control BMPs, drilled pole holes, installed poles, and installed anchors. The estimated completion date is December 2017. Approximately 15% complete.

ATTACHMENT A Photos



Photo 1: Micropile foundation drilling observed at Pole Z118126 (TL 682). Silt fencing was observed along the downslope side of the workspace for sediment control in accordance with the project's Erosion Control Plan and SWPPP (MM HYD-1), APM HYD-09, and MM BIO-7.

ATTACHMENT A (Continued)



Photo 2: A construction crew observed removing the old wooden pole and preparing the new steel pole for installation at Pole Z118216 (TL 682). Stephens' kangaroo rat exclusion barrier was observed surrounding the workspace in accordance with MM BIO-31.

ATTACHMENT A (Continued)



Photo 3: During pole hole drilling at Pole Z118044 (TL 682), archeological and Native American monitors were observed monitoring the construction activity and inspecting excavated soil for the presence of sensitive cultural resources in accordance with the HPMP, MM CUL-1, MM CUL-3, and APM CUL-04.

ATTACHMENT A (Continued)



Photo 4: During welding work conducted by the pole hole drilling crew at Pole Z118044 (TL 682), a dedicated fire patrol was observed wetting down the surrounding area prior to the hot work and monitoring the activity to ensure fire safety and compliance in accordance with the CFPPP, MM FF-1, and APM HAZ-01.

ATTACHMENT A (Continued)



Photo 5: A construction crew observed excavating a hole for pole anchor installation at Pole P172702 (C 78) within the approved and delineated workspace in accordance with MM BIO-1.

ATTACHMENT A (Continued)



Photo 6: During the rope stringing in preparation for conductor wire stringing at P257760 (C 78), cones and traffic control flaggers (not pictured) were in place along Viejas Grade Road to ensure traffic safety in accordance with 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-007	August 15, 2017	Construction activities associated with C78	Y
CPUC-008	November 8, 2017	Construction activities associated with C442	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
010	10/16/17	Addition of staging area and shift of pole P257776 (C78)	Approved	10/27/17