

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p>
	<p>Cleveland National Forest Power Line Replacement Projects</p> <p>Compliance Status Report: 037</p> <p>February 18, 2018</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 February 5, 2018 through February 18, 2018.

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 Line (TL) 682, Circuit (C) 442, 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 C442, construction activities observed by Dudek third party ECMs included drilling pole holes, digging, installing, and backfilling anchor holes, removing vegetation,

conducting helicopter external load operations at the Creekside Staging Yard to assist in pole installation, hanging dollies, and replacing overhead bolts. Along TL682, crews were observed conducting helicopter external load operations at the Lake Henshaw Staging Yard to assist in pole setting activities, installing erosion control best management practices (BMPs), drilling pole holes, installing a pole top, drilling micropile foundations and proof testing micropiles, removing sediment buildup and loading it into a container for helicopter external load transport, and potholing using hand tools.

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. On February 13, during setup of a crane at Z118059 (TL 682), crane pads were observed approximately 3-4 feet outside of the limits of the site access road. The on-site biological monitor informed the third party ECM that biological and cultural monitors had pre-cleared the area and approved the crew to construct the two crane pads the previous day, when the work was first initiated.

During construction activities, crews were observed adhering to delineated work limits and working within existing access roads in accordance with MM BIO-1. On February 6, a third party ECM observed that a foundation form had been set approximately three feet outside of the work limits at Z118018 (TL 682) where a crew was setting up for pole hole drilling (See Photo 1 – Attachment A). The Lead Environmental Inspector (LEI) notified the crew foreman to move the form into the delineated work area. No impacts to sensitive resources were observed.

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. In accordance with the Avian Protection Plan/Nesting Bird Management Plan and MM BIO-28, avian biologists were observed surveying for nesting raptors ahead of scheduled work activities along C442, and TL682. No-disturbance buffers were established around active nests and nest sites were monitored while work occurred within the vicinity.

On February 12, the Lead Biological Monitor (BM) informed the third party ECM that silt fencing had been installed as exclusionary fencing surrounding the Creekside Staging Yard at the recommendation of the authorized arroyo toad biologist (See Photo 2 – Attachment A).

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities, such as vegetation clearing, BMP installation, and pole hole drilling. Cultural resource monitors inspected excavated soils for potential sensitive cultural resources in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04. In addition, environmentally sensitive areas (ESAs) were fenced to prevent unauthorized access into areas with previously recorded cultural resources. During this reporting period, new discoveries were recorded and treated in accordance with the Historic Properties Management Plan.

During construction activities, construction fire patrols were observed inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) and MM FF-1. Construction 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 CFPPP Fire Prevention Matrices. A set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) was observed at active construction sites in accordance with APM HAZ-01 and APM HAZ-04.

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. On February 8, a crew was observed repairing a leak on a drilling rig and conducting cleanup of stained soil (See Photo 3 – Attachment A). Absorbent pads and drip pans were observed being used, and stained soil was placed in a drum for disposal in accordance with the Spill Response and Notification Plan and MM-PHS-2.

Site-specific erosion and sediment control BMPs continued to be observed along the project rights-of-way in accordance with the project Storm Water Pollution Prevention Plan (SWPPP), MM HYD-1, MM BIO-7, and APM HYD-09. Sediment control BMPs including fiber rolls, silt fencing, and prowattle were observed to be in good condition at pole replacement sites and staging yards. Track-out control BMP's, such as rattle plates and a rock apron were observed at the ingress and egress of the Creekside Staging Yard, in accordance with the SWPPP, Erosion Control Plan, MM-HYD-1, MM-BIO-7, and APM-HYD-09 (See Photo 4 – Attachment A). Sediment control BMPs are monitored and maintained onsite in accordance with the Erosion Control Plan, SWPPP, MM HYD-1, MM BIO-7, and APM HYD-09.

On February 13 the on-site BM informed the third party ECM that during micropile drilling at Z118054 (TL 682) on the previous day, the crew had encountered groundwater. Prowattle along the downslope perimeter of the site was not sufficient, so the crew had installed silt fencing and created earthen berms to contain the water. In order to manage groundwater for the current day's drilling; the crew had installed additional BMPs and was prepared to pump water into truck mounted storage tanks. A precipitation event occurred between February 12 and 13, 2018. Trace amounts of precipitation were observed in the rain gauges along TL625B, TL629E, TL6931, and C442. No storm water runoff was observed leaving active work areas as a result of the precipitation event.

In accordance with APM TRANS-02, traffic control measures were implemented during this reporting period. Traffic control measures, such as the placement of signage and cones as well as the use of flag persons were observed along Pine Creek Road and Highway 76 (See Photo 5 – Attachment A).

In accordance with APM VIS-01, construction activities were kept as clean and inconspicuous as possible.

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-compliance events were recorded during 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.

Transmission Line (TL) 625B

During this reporting period, construction crews conducted punch-list work, and inspected and maintained erosion control best management practices (BMPs). The estimated completion date is February 2018. Approximately 99% complete.

TL 629E

During this reporting period, construction crews inspected and maintained erosion control BMPs. The estimated completion date is April 2018. Approximately 85% complete.

TL 6931

During this reporting period, construction crews conducted fence repair, conducted punch-list work, and inspected and maintained erosion control BMPs. The estimated completion date is February 2018. Approximately 99% complete.

TL 682

During this reporting period, construction crews drilled pole holes, grouted and tested micropiles, installed poles, removed and/or topped poles, performed wire stringing, removed SKR fencing, and inspected and maintained erosion control BMPs. The estimated completion date is November 2018. Approximately 15% complete.

TL 629C Geotechnical Work

During this reporting period, no work occurred. The estimated completion date is February 2018. Approximately 10% complete.

Circuit (C) 78

During this reporting period, construction crews removed poles, completed wire stringing, conducted punch-list work, and inspected and maintained erosion control BMPs. The estimated completion date is February 2018. Approximately 98% complete.

C 442

During this reporting period, construction crews installed poles, anchors, and ground rods, removed poles, drilled pole holes, conducted tree trimming, conducted overhead work, maintained environmental signs and flagging, developed the Creekside Ranch Staging and Fly Yard, installed arroyo toad fencing around the Creekside Ranch Staging and Fly Yard, and inspected and maintained erosion control BMPs. The estimated completion date is March 2018. Approximately 75% complete.

ATTACHMENT A Photos



Photo 1: During drill site set up at Z118018 (TL 682), a foundation form was observed being staged approximately three feet outside of the delineated workspace. The LEI was notified, who contacted the crew foreman and had the form brought back inside the approved workspace (MM-BIO-1).

ATTACHMENT A (Continued)



Photo 2: At the recommendation of the authorized biologist, arroyo toad protective measures for exclusionary purposes, such as the use of silt fencing around the yard and a rubber flap and gravel bags at the yard entrance, were observed being implemented at Creekside Staging Yard (Section 2.11 - Streambed Alteration Agreement).

ATTACHMENT A (Continued)



Photo 3: A drilling crew was observed repairing a hydraulic fluid leak on a drill rig and conducting stained soil cleanup. Absorbent pads and drip pans were observed being utilized, and stained soils were placed in a drum for disposal in accordance with the Spill Response and Notification Plan and MM-PHS-2.

ATTACHMENT A (Continued)



Photo 4: Track-out control BMPs, such as rattle plates and a rock apron were observed at the ingress and egress of Creekside Staging Yard in accordance with the SWPPP, Erosion Control Plan, MM-HYD-1, MM-BIO-7, and APM-HYD-09.

ATTACHMENT A (Continued)



Photo 5: During steel pole installation with helicopter assistance, traffic control was setup in multiple locations along Highway 76 to temporarily stop traffic when work occurred adjacent to the highway in accordance with MM-TRANS-2.

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

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)	Pending	
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.	Pending	