

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 038 March 5, 2018

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 19, 2018 through March 4, 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 and 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 C 442, construction activities observed by Dudek third party ECMs included drilling pole holes, excavating for anchor holes, and crews conducting overhead work. Along

TL 682, crews were observed conducting helicopter external load operations, drilling pole holes, installing a pole top, drilling and grouting micropile foundations, cutting an old steel distribution pole, demobilizing drilling equipment and deconstructing a drill platform, and setting up drilling equipment.

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. 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 construction activities, crews were observed adhering to delineated work limits and working within existing access roads in accordance with MM BIO-1 (See Photo 1 – Attachment A).

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 C 442 and TL 682. No-disturbance buffers were established around active nests and nest sites were monitored while work occurred within the vicinity. Arroyo toad exclusionary fencing surrounding the Creekside Staging Yard, in place at the recommendation of the authorized biologist, remained in place in accordance with the Streambed Alteration Agreement (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 resources 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, cultural resources environmental sensitive areas (ESAs) were fenced to prevent unauthorized access into areas with previously recorded cultural resources (See Photo 3 – Attachment A).

During construction activities, construction fire patrols were observed inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) and MM FF-1 (See Photo 4 – Attachment A). 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.

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 included fiber rolls, silt fencing, and pro-wattle were observed to be in good condition at pole replacement sites and staging yards (See Photo 5 – Attachment A).

On February 26, an on-site biological monitor informed the third party ECM that pre-storm BMP inspections were conducted earlier that morning, in anticipation of a forecast rain event, as required by the SWPPP, the Erosion Control Plan, and Construction General Permit for C 442. Light precipitation occurred between February 21 and 24. Trace amounts of precipitation were observed in the rain gauges located along TL 625B, TL 629E, TL 691, C442, and TL 682. No storm water runoff was observed leaving active work areas as a result of the precipitation.

Additional precipitation occurred on February 27, 28, and on March 3. Varying amounts of precipitation were observed in the rain gauges located along TL 625B, TL 629E, TL 6931, C442, and TL 682 for the storm event on February 27 and 28, ranging from 1.1 inches at the Japatul Spur Construction Yard to trace precipitation on TL 6931. Only trace precipitation was recorded for all project components as a result of the March 3 precipitation.

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 Highway 76.

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 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.

TL 625B

During this reporting period, construction crews conducted site cleanup, and removed project signage. The estimated completion date is March 2018. Approximately 99% complete.

TL 629E

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

TL 6931

During this reporting period, construction crews conducted fence repair, conducted access road repair, conducted punch-list work, and inspected and maintained erosion control BMPs. The estimated completion date is March 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, conducted overhead work, 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 March 2018. Approximately 10% complete.

C 78

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

C 442

During this reporting period, construction crews installed poles, anchors, and ground rods, removed poles, drilled pole holes, conducted overhead work, maintained environmental signs and flagging, and inspected and maintained erosion control BMPs. The estimated completion date is March 2018. Approximately 85% complete.

ATTACHMENT A Photos



Photo 1: A construction crew is observed installing a pole top at Z118150 (TL 682). All work was observed being conducted within the designated workspace in accordance with MM-BIO-1.

ATTACHMENT A (Continued)



Photo 2: Arroyo toad exclusionary fence surrounding the Creekside Staging Yard remains in place at the recommendation of the authorized biologist in accordance with the Streambed Alteration Agreement.

ATTACHMENT A (Continued)



Photo 3: During crane setup/mobilization for drilling at along TL 682, an ESA was observed along the eastern perimeter of the site in accordance with the Historic Properties Management Plan.

ATTACHMENT A (Continued)



Photo 4: During cutting of the existing steel distribution pole at Z118048 (TL 682), a fire patrol was observed monitoring the hot work and wetting down the surrounding area in accordance with the CFPPP.

ATTACHMENT A (Continued)



Photo 5: At P178056 (C 442), dirt spoil was covered and fiber rolls were in place to prevent erosion in accordance with the Erosion Control Plan and SWPPP. The pole hole was securely covered for safety and to prevent wildlife entrapment in accordance with MM-BIO-23.

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 combed with NTP #13.	Pending	
015	2/22/18	Request to move a pole, per permittee request and additional pole work outside of the Rincon Substation.	Pending	