

	<b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting Program</i></b>
	<b>Cleveland National Forest Power Line Replacement Projects</b>  <b>Compliance Status Report: 039</b>  <b>March 18, 2018</b>

## 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 March 5, 2018 through March 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 C 442, construction activities observed by Dudek third party ECMs included setting poles and backfilling, excavating for anchor holes, removal of a wooden pole butt, wire

pulling, and crews conducting overhead work. Along TL 682, crews were observed conducting helicopter external load operations, drilling pole holes, installing pole tops, drilling and grouting micropile foundations, capping poles, trenching for installation of grounding wire and rods, constructing an earthen ramp in preparation for concrete pouring, conducting overhead work, transferring wire, staging and framing poles, and setting up and demobilizing 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 (See Photo 1 – Attachment A). 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. 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 and establishing no-disturbance buffers around active nests. Nest sites were observed being monitored while work occurred within the vicinity. Cultural resource monitors, including Archaeological and Native American Monitors, were also observed monitoring ground disturbing activities, such as pole hole drilling and anchor hole excavation (See Photo 2 – Attachment A). 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.

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 (See Photo 3—Attachment A).

Along line segments, crews were observed implementing spill prevention best management practices (BMPs) to prevent leaks and spills from being discharged into the soil in accordance with the Spill Response and Notification Plan (MM PHS-2). Spill prevention BMPs 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 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, and silt fencing at pole replacement sites and staging yards. On March 6, the third party ECM notified the SDG&E Lead Environmental Inspector (LEI) that erosion control BMPs at Pole Z118051 (TL 682)

were observed to be in need of maintenance (See Photo 4 – Attachment A). On March 8, the third party ECM observed that the BMPs had been repaired.

In accordance with MM NOI-1, noise barriers were used during micropile drilling activities at Z118042 (TL 682) to minimize noise disturbance to adjacent residences (See Photo 5 – Attachment A).

In accordance with MM REC-2, proper gate protocol was observed being implemented at staging yards (See Photo 6 – Attachment A).

In accordance with APM TRANS-02, traffic control measures were implemented. Traffic control measures, including the placement of signage and cones as well as the use of flag persons were observed along Highway 76. 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-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 inspected and maintained erosion control BMPs. The estimated completion date is March 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 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 20% 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, and completed site cleanup. This work was 100% completed.

#### C 442

During this reporting period, construction crews installed poles, anchors, and ground rods, conducted stringing operations, removed poles, drilled pole holes, conducted overhead work, and inspected and maintained erosion control BMPs. The estimated completion date is March 2018. Approximately 95% complete.

## ATTACHMENT A Photos

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**Photo 1:** During micropile drilling at Z118042 (TL 682), a crew member was observed spraying water in a drill hole to reduce dust in accordance with APM AIR-02.

## ATTACHMENT A (Continued)



**Photo 2:** During anchor hole excavation, an ESA fence was observed and cultural resource monitors were on-site in accordance with the Historic Properties Management Plan, MM CUL-1, MM CUL-3, and APM CUL-04.

## ATTACHMENT A (Continued)



**Photo 3:** 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 during ground wire and rod trenching at Z118106 (TL 682).

## ATTACHMENT A (Continued)



**Photo 4:** During capping at Pole Z118051 (TL 682), erosion control BMPs were observed to be in need of maintenance. The project Lead Environmental Inspector was notified, and BMPs were subsequently repaired.

## ATTACHMENT A (Continued)



**Photo 5:** Noise barriers were observed being used during micropile drilling activities at Z118042 (TL 682) to minimize noise disturbance at an adjacent residence, in accordance with MM NOI-1.

## ATTACHMENT A (Continued)



**Photo 6:** Proper gate protocol being implemented at the gate leading to the Love Valley Staging Yard. The gate was observed to be locked when not being used for ingress and egress, in accordance with MM REC-2.

## ATTACHMENT B Notices to Proceed

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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
CPUC-012	January 9, 2018	Reconstruct TL 6957 (formerly referred to as 625D)	Y

## ATTACHMENT C

### Minor Project Refinement Request

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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.	Approved	4/5/18
015	2/22/18	Request to move a pole, per permittee request and additional pole work outside of the Rincon Substation.	Approved	3/14/18