

	<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: 044</p> <p>May 27, 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 May 14, 2018 through May 27, 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 Lines (TL) 629E, 682 and 6957 (TL625D), 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 TL629E, construction activities observed by Dudek third party ECMs included sagging and dead ending of line, replacing a transmission insulator, installing line jumpers,

clipping lines, and completing transmission line punch list work. Along TL682, crews were observed clearing vegetation and installing best management practices (BMPs), drilling for micropile foundations, grouting and dropping bar, trenching for ground rod installation, setting a rebar cage, drilling pole and anchor holes, framing and preparing to set a pole top, and applying hydromulch to work spaces. Along TL 6957 (TL625D), crews were observed clearing vegetation, pruning trees and installing BMPs, installing and trimming rebar, grading at stringing sites, digging a pole holes and mobilizing 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. Track-out was not observed along paved access roads in accordance with APM AIR-05.

During construction activities, crews were observed adhering to delineated work limits and working within existing access roads in accordance with MM BIO-1 and SDG&E biological monitors were observed conducting full-time monitoring of initial ground-disturbing activities and vegetation clearing (MM BIO-3 and MM BIO-22) (See Photo 2 – Attachment A). During road grading activities, crews were observed salvaging and stockpiling topsoil for later restoration use at work sites in accordance with the Habitat Restoration Plan (MM BIO-4) (See Photo 3 – Attachment A). Avian biologists were observed surveying for nesting birds ahead of scheduled work activities and crews were observed coordinating work schedules with avian biologists to ensure work was initiated prior to expiration of nesting bird surveys for the area per the Nesting Bird Management Plan (MM BIO-28) (See Photo 4—Attachment A). Environmentally sensitive area (ESA) signage was observed posted to delineate nesting bird buffers and provide further instruction to field crews on allowed activities (e.g. signage indicating “drive through access allowed” was observed on certain access roads adjacent to buffers) (Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP; MM BIO-28).

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities as recommended in the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04. In addition, ESA signs and fencing was observed 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 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. A water tender was observed wetting down work areas during grading to reduce fire risk and control dust emission, in accordance with CFPPP (See Photo 1 – Attachment A).

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 including 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 including fiber rolls, silt fencing, and prowattle were observed at pole replacement sites and staging yards. Crews were observed applying hydro-mulch to work areas in accordance with the Erosion Control Plan (MM HYD-1) and the Habitat Restoration Plan (MM BIO-4).

In accordance with MM REC-2, proper gate protocol was observed being implemented (See Photo 5 – 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 (See Photo 6 – Attachment A).

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 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 cleanup activities and conducted punch-list work. The estimated completion date is June 2018. Approximately 99% complete.

TL 629E

During this reporting period, construction crews inspected and maintained erosion control BMPs, and conducted overhead work and stringing activities. The estimated completion date is June 2018. Approximately 95% complete.

TL 6931

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

TL 682

During this reporting period, construction crews drilled pole holes, grouted, capped, and tested micropiles, installed poles and grounds, removed and/or topped poles, conducted overhead work and stringing activities, cleared Phase III work areas, and inspected and maintained erosion control BMPs. The estimated completion date is November 2018. Approximately 45% complete.

TL 629C Geotechnical Work (On Hold)

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

TL 6957

During this reporting period, construction crews cleared work areas, drilled pole holes, and installed and maintained erosion control BMPs. The estimated completion date is December 2018. Approximately 5% complete.

C 442

During this reporting period, construction crews conducted vegetation trimming, and installed and maintained erosion control BMPs. The estimated completion date is June 2018. Approximately 99% complete.

ATTACHMENT A Photos



Photo 1: During grading of stringing site 6 (TL6957), a water tender was used to follow behind the movement of steel-tracked equipment, to wet down the work area for fire risk during grading in accordance with the CFPPP fire prevention matrix (on CNF land - PAL B), and to prevent dust emissions in accordance with APM AIR-2. In addition, the required fire tools were staged on-site, and observed on/in all equipment and vehicles on the ROW in accordance with the CFPPP, MM FF-1, MM BIO-7, and APM HAZ-04.

ATTACHMENT A (Continued)



Photo 2: Prior to SWPPP BMP installation, a biological monitor observes vegetation clearing activities/initial ground-disturbing activities at Pole Z571417 (TL6957) in accordance with MM BIO-22. Fire equipment was observed on site in accordance with the Construction Fire Protection /Prevention Plan (CFPPP) (MM FF-1).

ATTACHMENT A (Continued)



Photo 3: During grading of stringing site 5 (TL 6957), topsoil was salvaged and stockpiled for later use in restoration, in accordance with the Habitat Restoration Plan (MM BIO-4). Fiber rolls along the downslope perimeter of the work limits were effective in retaining sediment within the work limits and stockpiled topsoil was covered with jute mesh in accordance with the Erosion Control Plan and SWPPP (MM HYD-1).

ATTACHMENT A (Continued)



Photo 4: In accordance with the APP, NBMP, and MM BIO-28, an Avian Biologist was observed monitoring an active nest near Pole Z118096 (TL 682) to ensure no impacts were occurring as a result of nearby vegetation removal.

ATTACHMENT A (Continued)



Photo 5: Construction crews were observed implementing proper gate protocol for forest service lands by locking gates immediately after ingress and egress in accordance with MM REC-2 (picture of gate used to access Z571436 and Z571435 (TL6957)), where vegetation clearing was observed.

ATTACHMENT A (Continued)



Photo 6: In accordance with APM TRANS-02, flaggers were present to maintain a safe travel corridor along Highway 76 during pole and equipment ingress to Pole Z115712 (TL682).

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
CPUC-012	January 9, 2018	Reconstruct TL 6957 (formerly referred to as 625D)	Y
CPUC-013	April 5, 2018	Reconstruct TL 682 Phase III	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.	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
016	3/29/18	Refinements to TL 629E	Approved	4/3/18