	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 047** **July 8, 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 June 25, 2018 through July 8, 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) 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 TL682, construction activities observed by Dudek third party ECMs included removing wooden pole butts, spreading wire, conducting helicopter operations to assist with wire

spreading, micropile drilling, setting poles, and drilling and hand digging pole and anchor holes. Along TL 6957, crews were observed trimming and chipping vegetation, installing poles, assembling pole components, drilling, excavating, and backfilling pole and anchor holes, letting down wire, installing sediment control Best Management Practices (BMPs), and capping micropile foundations.

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. Track-out was not observed along paved access roads in accordance with APM AIR-05 (See Photo 1 – Attachment A).

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 2 – Attachment A). In accordance with MM BIO-3 and MM BIO-22, SDG&E biological monitors were observed conducting full-time monitoring of initial ground-disturbing activities as well as vegetation clearing (See Photo 3—Attachment A). Excavation areas were covered to prevent wildlife entrapment, in accordance with MM BIO-23 (See Photo 4 – Attachment A). Environmentally sensitive area (ESA) signs and flagging were observed in work locations and being avoided by construction crews in accordance with MM BIO-14 (special-status plants) and MM BIO-28 (nesting bird buffers). In accordance with the Avian Protection Plan/Nesting Bird Management Plan and MM BIO-28, avian biologists were observed surveying for birds and nesting activity ahead of scheduled work activities and establishing nesting bird buffers. Nest deterrent methods approved in the Nesting Bird Management Plan, such as placing netting over staged equipment, were observed in use at pole sites and staging yards.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04. In addition, cultural resources ESAs were fenced and signed to prevent unauthorized access into areas with previously recorded cultural resources (See Photo 5 – 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. 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, APM HAZ-04 and MM FF-1 (See Photo 6 – 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's Storm Water Pollution Prevention Plan (SWPPP) and Erosion Control Plan (ECP) (MM BIO-7, MM HYD-1). Sediment control BMPs, including fiber rolls, silt fencing, and prowattle, were observed at pole replacement sites and staging yards. During inspection of the staging yards, rattle plates at the entrance/exit were observed to be clean and functional in accordance with the project's SWPPP and ECP (See Photo 1 – 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.

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 observed or reported 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 July 2018. Approximately 99% complete.

TL 629E

During this reporting period, construction crews inspected and maintained erosion control BMPs, conducted overhead work, and tested and spliced fiber optic cable. The estimated completion date is July 2018. Approximately 99% complete.

TL 6931

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

TL 682

During this reporting period, construction crews drilled for, grouted, capped, and tested micropiles, installed poles, anchors, and grounds, removed pole butts, topped and removed old poles, sagged, tensioned, and secured fiber optic cable, repaired and replaced fencing, transferred conductor to new poles, cleared Phase III work areas, excavated for direct-bury pole installation, anchor installation, and grounding, and installed, inspected and maintained erosion control BMPs. The estimated completion date is January 2019. Approximately 55% complete.

TL 629C Geotechnical Work (On Hold)

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

TL 6957

During this reporting period, construction crews cleared work areas, drilled pole holes, drilled for, grouted, capped, and tested micropiles, excavated for direct-bury pole installation, installed anchors, grounds, and poles, established the SWAT Staging and Fly Yard and the Lyons Valley Staging and Fly Yard, and installed and maintained erosion control BMPs. The estimated completion date is December 2018. Approximately 10% complete.

ATTACHMENT A
Photos

Photo 1: To prevent sediment trackout onto Lyons Valley Road a worker was observed maintaining the rock apron and clearing debris from the rattle plate installed at the ingress/egress point to the Swat Yard, in accordance with the Erosion Control Plan and SWPPP (MM HYD-1, MM BIO-7). Track-out was not observed (APM AIR-05).

Photo 2: During pole hole drilling at Z571441 (TL 6957), crews were observed using approved access roads (marked with signage) in accordance with MM BIO-1.

Photo 3: A Biological Monitor was present during vegetation removal at Pole Z118090 (TL 682) in accordance with MM BIO-3.

Photo 4: Hand- digging that occurred at pole P971138 (TL 6957) during the previous work day was observed completed. To prevent wildlife entrapment per MM BIO-23, the hole was covered and fenced and spoils were covered with black visqueen to prevent erosion in accordance with the Erosion Control Plan (ECP) and the SWPPP (MM HYD-1, MM BIO-7). Straw wattles installed around the site were observed in good condition.

Photo 5:. A crew was observed spreading wire at Z118024 (TL 682) to allow for the overhead space necessary for the helicopter transport of drilling equipment to the site. To prevent workers from entering an environmentally sensitive area (ESA), the footpath and workspace were delineated with yellow rope and ESA signage in accordance with the Historic Properties Management Plan (MM CUL-1).

Photo 6: During grounding installation at Z571447 (TL6957), a truck-mounted water tank with over 150 gallons of water, including a pump and a hose, was observed on-site (in addition to the standard required fire tools) to satisfy CFPPP fire prevention matrix requirements for trenching work off CNF land with an elevated FPI

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
CPUC-014	June 26, 2018	Reconstruct/Relocate C157	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
017	4/12/18	Refinements to C157	Approved	6/26/18