

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i></p>
	<p>Cleveland National Forest Power Line Replacement Projects</p> <p>Compliance Status Report: 049</p> <p>August 5, 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 July 23, 2018 through August 5, 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, 6923, 6931, 6957 (TL625D), and Circuit (C) 157, 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 TL 629E, construction activities observed by Dudek third party ECMs included crews removing a steel pole and cutting a wooden pole. Along TL682, crews were observed trenching for and installing ground rods, digging pole holes, conducting helicopter external load operations, framing poles, installing a pole top, micropile drilling, grouting, and capping, setting bar, excavating, installing, and backfilling anchor and pole holes, spreading wire, and maintaining and removing BMPs. Along TL 6923, crews were observed conducting geotechnical investigations. Along TL 6931, crews were observed grading water bars and maintaining energy dissipaters. Along TL 6957, crews were observed testing grounding, conducting line work, tree trimming and chipping, framing poles, excavating for, installing, and backfilling poles and anchors, and conducting helicopter external load operations. Along C 157 crews were observed clearing and chipping vegetation, excavating for poles and anchors, and installing Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).

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 Photos 1 and 2 – 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. 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 3 – 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), MM BIO-28 (nesting bird buffers), and MM BIO-30 (bat 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.

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 (See Photo 3 – Attachment A). In addition, cultural resources ESAs were fenced and signed 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, APM HAZ-04 and MM FF-1 (See Photos 2 and 3 – 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 Erosion Control Plan (ECP) and SWPPP (APM HYD-09, MM HYD-1, MM BIO-7). Sediment control BMPs, including fiber rolls, silt fencing, and pro-wattle, were observed at pole replacement sites and staging yards. During inspection of the staging yards and intersections of paved and unpaved roads, rattle plates were observed to be clean and functional in accordance with the Project SWPPP and ECP.

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 and along Lyons Valley Road (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

During this reporting period, SDG&E self-reported a Level 1 Minor Deviation that occurred on July 23, 2018. A truck and a water buffalo were driven outside the delineated work workspace on TL 6957. This resulted in approximately twenty feet of superficial tire tracks through disturbed habitat and non-native grassland. Upon inspection from SDG&E's monitors, it was determined that no sensitive resources were affected. As a follow-up to the deviation, crews were reminded of the requirements set forth in MM BIO-1, which requires confinement of all construction activity to approved and delineated workspaces. MM BIO-1 requirements were also addressed during the July 24th morning tailboard meeting prior to starting work for the day.

On August 2nd, the CPUC third-party monitor observed and documented a Level 1 Minor Deviation at Pole Location P101608 (TL 682); a crew was observed hand-digging around the conduit riser without an archaeological or cultural monitor present per recommendations in the HPMP (Appendix A). The CPUC ECM notified the lead archaeological monitor for the TL 682 component who arrived on site and halted

digging until a cultural monitor could be called out to the site to assess and monitor the activity. The cultural monitor arrived and collectively, the monitors reviewed the area that had been excavated by the crews prior to their arrival and no cultural resources were observed, nor were any resources observed for the remainder of the trenching work that day. SDG&E addressed the deviation with the contractor at the morning tailboard and weekly construction meeting to enforce when and where and during which activities require specific monitors such as archaeological and cultural monitors.

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 August 2018. Approximately 99% complete.

TL 629E

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

TL 6931

During this reporting period, construction crews inspected and maintained erosion control BMPs, and completed SWPPP punch list item work, including waterbar maintenance along access roads. This work was 100% completed.

TL 682

During this reporting period, construction crews drilled for, installed, grouted, capped, and tested micropiles, installed poles, anchors, and grounds, removed old 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 58% complete.

TL 629C Geotechnical Work

During this reporting period, crews drilled geotechnical bores. This work is 100% completed.

TL 6923 Geotechnical Work

During this reporting period, crews drilled geotechnical bores. The estimated completion date is August 2018. Approximately 10% complete.

TL 6957

During this reporting period, construction crews trimmed vegetation, drilled pole holes, excavated for direct-bury pole and anchor installation, installed anchors, grounds, and poles, improved access roads, installed, inspected, and maintained erosion control BMPs. The estimated completion date is December 2018. Approximately 10% complete.

C157

During this reporting period, construction crews cleared work areas, improved access roads, Conducted archeological investigations at pole foundation and anchor hole sites, and installed, inspected, and maintained erosion control BMPs. The estimated completion date is December 2018. Approximately 1% complete.

ATTACHMENT A Photos



Photo 1: Track-out was not observed along paved access roads, in accordance with APM AIR-05 and the SWPPP (APM HYD-09, MM HYD-1, MM BIO-7). Rattle plates were documented at the ingress/egress of Love Valley Road, and the gate was kept closed and locked to prevent unauthorized access in accordance with MM REC-2.

ATTACHMENT A (Continued)



Photo 2: During water bar grading and energy dissipater maintenance between Poles Z44282 and Z44281 (TL 6931), a 150-gallon water truck was used to aid in soil compaction and dust control in accordance with APM AIR-02 and to comply with the CFPPP fire prevention matrix (off CNF land - FPI elevated) (MM FF-1)

ATTACHMENT A (Continued)



Photo 3: Biological, archaeological, and Native American monitors were present for initial ground disturbance at Pole P103493 (TL682) in accordance with MM BIO-3, MM BIO-22, APM CUL-04, MM CUL-1e, and the HPMP. A complete set of fire tools as required by the CFPPP (MM FF-1) were on site, and work limits were clearly delineated in accordance with MM BIO-1. Erosion control BMPs were installed and in good condition in accordance with the SWPPP (APM HYD-09, MM HYD-1, MM BIO-7).

ATTACHMENT A (Continued)



Photo 4: A completed pole hole at Pole P618317 (TL682) was observed securely covered to prevent wildlife entrapment in accordance with MM BIO-23. In addition, the spoils stockpile was covered with plastic sheeting to prevent erosion in accordance with the Erosion Control Plan and SWPPP (APM HYD-09, MM HYD-1, MM BIO-7).

ATTACHMENT A (Continued)



Photo 5: In accordance with MM BIO-30, a 100-foot exclusion buffer was observed around a maternity bat roost at C157.

ATTACHMENT A (Continued)



Photo 6: During helicopter external load operations assisting activities at Z118101 (TL682), flaggers were observed temporarily stopping traffic along Highway 76 in accordance with the Aviation Safety Plan (MM PHS-5) and APM TRANS-02.

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
CPUC-016	July 10, 2018	Geotechnical Activities associated with TL 6923 and TL 625C	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