

# California Public Utilities Commission Mitigation Monitoring, Compliance, and Reporting Program

**Cleveland National Forest Power Line Replacement Projects** 

**Compliance Status Report: 052** 

**September 16, 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 September 3, 2018 through September 16, 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) 629C, 682, 6957 (formerly 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.

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#### Implementation Actions

Dudek third party ECMs observed crews drilling foundations as well as installing poles, anchors, and grounds along TL 629C, 682, 6957, and C157 (See Photo 1 – Attachment A). ECMs also observed helicopter external load operations, pole removal, and pole framing and setting along TL 682 and 6957. Crews were observed clearing vegetation and installing erosion and sediment control best management practices (BMPs) along TL 629C and 682, applying hydromulch along TL 682 (See Photo 2 – Attachment A), and maintaining access roads along TL 6957.

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. ECMs observed use of helicopters to water remote work areas along TL 6957. Containment systems were used to limit dust emissions during jackhammering, in accordance with APM AIR-05 (See Photo 3 – Attachment A).

During construction activities, crews were observed adhering to delineated work limits, in accordance with MM BIO-1, and environmentally sensitive area (ESA) signs and flagging were installed to protect sensitive biological resources. Excavation areas were covered to prevent wildlife entrapment, in accordance with MM BIO-23, and crews were observed containing trash in bags throughout the day, in accordance with MM BIO-26.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities and ESAs were marked to prevent unauthorized access into areas with previously recorded cultural resources, in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, APM CUL-04, and APM CUL-05 (See Photo 4 – Attachment A).

CPUC ECMs observed fire patrols inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) and MM FF-1 throughout the reporting period. Construction crews were also observed staging the required fire tools and equipment based on site-specific conditions as described in the CFPPP Fire Prevention Matrices.

To prevent leaks and spills from being discharged into the soil in accordance with the Spill Response and Notification Plan (MM PHS-2), crews implemented 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. CPUC ECMs continued to observe installation and maintenance of site-specific erosion and sediment control BMPs, including fiber rolls, silt fence, netting, prowattle, and hydromulch along the project rights-of-way in accordance with the project's Erosion Control Plan (ECP) and Storm Water Pollution Prevention Plan (SWPPP) (APM HYD-09, MM HYD-1, MM BIO-7) (See Photo 5 – Attachment A).

In accordance with APM TRANS-02, traffic control measures, including the placement of signage and cones as well as the use of flag persons were observed along Highway 76 and 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 two Level 1 Minor Deviations, both of which occurred on September 5, 2018. The first consisted of equipment that was staged outside of the delineated work area at Pole Z118042 (TL 682) and the second consisted of a pole that was staged and framed outside of the delineated workspace at Pole Z118045 (TL 682) (MM BIO-1). Neither event resulted in impacts to sensitive resources and both were reported as Level 1 Minor Deviations.

A Level 1 Minor Deviation was reported by the CPUC third-party ECM on September 14, 2018. The ECM observed a wire equipment basket (delivered by helicopter) set down outside of the approved workspace limits at P412526 (TL 682) (MM BIO-1) due to safety concerns associated with an adjacent coast live oak (*Quercus agrifolia*) tree branches overhanging the workspace. The basket was placed in an area that consisted of mowed, non-native grasses and oak leaf litter. The Biological Monitor on site ordered the basket moved to an area within the approved workspace. Upon inspection of the area where the basket had been placed outside the delineated work limits, biological and cultural monitors were able to determine that no sensitive biological or cultural resources were impacted by the basket placement. In effort to avoid repeating this type of workspace incident, SDG&E, in coordination with project contractors and environmental inspectors implemented additional advanced planning aimed at reviewing potential overhead obstructions prior to conducting work at locations.

#### 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 October 2018. Approximately 99% complete.

#### TL 629 C

During this reporting period, construction crews cleared work areas, developed the Buckman Springs Fly Yard, drilled for and installed micropiles, conducted potholing, and maintained erosion control BMPs. The estimated completion date is March 2019. Approximately 10% complete.



#### TL 629E

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

#### TL 682

During this reporting period, construction crews drilled for, installed, grouted, capped, and tested micropiles; installed poles, anchors, and grounds; removed old poles; conducted overhead work; excavated for direct-bury pole installation, anchor installation, and grounding; applied hydromulch; and installed, inspected and maintained erosion control BMPs. The estimated completion date is January 2019. Approximately 65% complete.

#### TL 6957

During this reporting period, construction crews excavated for and installed poles; drilled for, installed, grouted, and tested micropiles; removed old poles; conducted overhead work; conducted access road work; and installed, inspected, and maintained erosion control BMPs. The estimated completion date is December 2018. Approximately 20% complete.

#### C157

During this reporting period, construction crews cleared work areas, completed access road maintenance, excavated direct-bury pole foundation holes and anchor holes, installed grounds, and installed, inspected, and maintained erosion control BMPs. The estimated completion date is December 2018. Approximately 30% complete.

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## ATTACHMENT A Photos



**Photo 1:** CPUC ECMs observed a crew drilling at Z293658 along TL 6957.



**Photo 2:** A crew is observed applying hydromulch at Z118153 (TL 682), in accordance with the Erosion Control Plan and SWPPP.



**Photo 3:** The hand digging crew at Pole P258090 (C 157) was observed using a containment system to capture dust emissions from rock jackhammering, in accordance with APM AIR-05.



**Photo 4:** During grounding installation at Z118080 (TL 682), an archaeological monitor was observed inspecting the trench and excavated soils for cultural resources in accordance with MM CUL-1 and APM CUL-04.



**Photo 5:** During micropile drilling at Z40517 (TL 629C), silt fencing and a gravel bag berm were installed along the downslope side of the work area to contain groundwater from being expelled from the drill hole, in accordance with the Erosion Control Plan and SWPPP.



**Photo 6:** During pole framing and installation at Z112236, crews implemented a lane closure along Highway 76 in accordance with 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	Υ
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	Υ
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-015	August 30, 2018	Request to begin construction on C 449	Y
CPUC-016	July 10, 2018	Geotechnical Activities associated with TL 6923 and TL 625C	Υ
CPUC-017	August 30, 2018	Request to being construction on TL 629C	Y
CPUC-018	August 15, 2018	Request to implement a geotechnical investigation program, including geotechnical borings, along C 79A.	Y

## ATTACHMENT C Minor Project Refinement Request

Minor Project Refinement Request	Submitted	Dogovinskion	Ctatus	A
No.		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
800	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
018	5/29/18	Refinements to C 449	Approved	8/30/18
019	7/2/18	Refinements to TL 629C	Approved	8/30/18
020	8/23/18	Request for road maintenance and temporary access and pole workspaces along C 157	Approved	8/29/18