

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

Cleveland National Forest Power Line Replacement Projects

Compliance Status Report: 053

September 30, 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 17, 2018 through September 30, 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.

DUDEK

Implementation Actions

Dudek third party ECMs observed crews excavating for and installing poles, anchors, and grounds along TL 629C, 682, 6957, and C157 (See Photo 1 – Attachment A). Crews were observed drilling for, grounding, and proof testing micropiles along TL 629C and 6957. ECMs also observed helicopter external load operations along TL 682, 6957, and C157 (See Photo 2 – Attachment A). Crews cleared vegetation, and installed BMPs along TL 629C as well as installing rebar at TL 629C and conducting wire spreading and dead-ending activities along TL 682 and 629C (See Photo 3 – Attachment A).

During this reporting period, CPUC ECMs observed implementation of dust control measures including the application of water on access roads, in work areas, and in fly yards in accordance with APM AIR-02. Water was applied via water truck, portable tanks and hand-held hose, or helicopter drop based on accessibility of the work location. ECMs observed drill cuttings containment with covers to reduce dust emissions during operation in accordance with APM AIR-05 (See Photo 4 – Attachment A).

During construction activities, crews were observed adhering to delineated work limits and working within existing access roads and clearly marked footpaths, in accordance with MM BIO-1. Environmentally sensitive area (ESA) signs and flagging were observed in work locations, in accordance with MM BIO-16 (butterfly host species), and Arroyo Toad exclusion fencing was installed in accordance with the Arroyo Toad Monitoring and Relocation Plan (ATMRP; MM BIO-33) (See Photo 5 – Attachment A). CPUC ECMs confirmed that an Authorized Biologist checked roads for Arroyo Toad along C 157 in accordance with the ATMRP during this reporting period.

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, APM CUL-04, and APM CUL-05. Protective mats were placed on the ground, ESA fencing was installed, and "Monitor Required" signs were posted at entrances to sensitive cultural resource areas in accordance with the HPMP, APM CUL-04, and MM CUL-1.

During construction activities, construction fire patrols were observed inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) and MM FF-1. ECMs observed BMPs for refueling generators (See Photo 6 – Attachment A) as well as water application prior to vegetation trimming and chipping, in accordance with the CFPPP.

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, drip pans beneath staged equipment and sanitary facilities, and spill kits (See Photo 6 – Attachment A).

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). In accordance with APM TRANS-



02, traffic control measures were implemented including the placement of signage and cones as well as the use of flag persons were observed along Highway 76, Carveacre Road, and Old Highway 80.

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

A Level 1 Minor Deviation was reported by SDG&E on September 19, 2018. The CPUC third party ECM and the SDG&E Biological Monitor observed trash, including some food related items, on the ground adjacent to a construction contractor vehicle which had been staged overnight (MM BIO-26). A bag of trash had not been removed from the previous day's work and the monitors observed what they identified as coyote tracks at the site, indicating that coyotes had likely broken into the bag and dispersed the contents around the site. SDG&E reminded all crews of project requirements to contain and remove trash from the site on a daily basis.

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 vegetation in work areas; excavated for and installed poles and anchors; drilled for, installed, and grouted micropiles; conducted potholing; and installed, inspected and maintained erosion control BMPs. The estimated completion date is March 2019. Approximately 13% 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; excavated for and installed poles, anchors, and grounds; removed old poles; conducted overhead work; and installed, inspected and maintained erosion control BMPs. The estimated completion date is February 2019. Approximately 68% complete.

TL 6957

During this reporting period, construction crews excavated for and installed poles; drilled for, installed, grouted, capped, and tested micropiles; removed old poles; conducted overhead work; conducted access road maintenance; and installed, inspected, and maintained erosion control BMPs. The estimated completion date is December 2018. Approximately 35% complete.

C157

During this reporting period, construction crews cleared work areas, excavated direct-bury pole and anchor holes, installed poles, and installed, inspected, and maintained erosion control BMPs. The estimated completion date is December 2018. Approximately 35% complete.

DUDEK

ATTACHMENT A Photos



Photo 1: Crews were observed setting pole bases along TL 629C.



Photo 2: A crew was observed utilizing helicopter external load operations to set the pole at P278714 (C157).



Photo 3: Crews were observed sagging and dead-ending wire at Z118096 (TL 682).



Photo 4: A covered containment box was used to trap drill cuttings and reduce dust emissions during micropile drilling at Z571420 (TL 6957), in accordance with APM AIR-05.



Photo 5: Arroyo toad exclusion fencing was installed at P258086 (C157) in accordance with the Arroyo Toad Monitoring and Relocation Plan (MM BIO-33).



Photo 6: In accordance with the CFPPP, the generator at P258090 was fueled first thing in the morning after it had cooled overnight. In addition, a drip pan was staged under the fuel can to prevent potential spills or drips onto the ground during fueling in accordance with MM PHS-2.

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	Υ
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)	Υ
CPUC-013	April 5, 2018	Reconstruct TL 682 Phase III	Υ
CPUC-014	June 26, 2018	Reconstruct/Relocate C157	Υ
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	Υ
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				
No.	Submitted	Description 100 Marie 110	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
021	8/23/18	Request for a new pole on Phase III of TL 682	Approved	9/24/18