	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 058** **December 9, 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 November 26, 2018 through December 9, 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, 6957 (formerly TL625D), and 6931, and Circuits (C) 157 and 449, 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 at TL 6957, CPUC ECMs observed crews performing maintenance on sediment control Best Management Practices (BMPs) such as fiber rolls and access road water bars, removing and disposing of pole butts, cleaning excess grout, and conducting wire stringing activities. At TL 629C, crews were observed trimming trees along access roads and removing vegetation within approved workpsaces; drilling direct bury holes; setting up and mobilizing drilling equipment; setting rebar; pouring concrete, trenching for grounding rod, proof-testing, capping, and drilling micropile foundations; and spreading wire, utilizing helicopter external load operations for micropile sites and letting down wire where needed to mobilize equipment. At C157, crews were observed excavating and installing poles and tightening affiliated anchors and stringing wire. At C449, crews were observed installing sediment control BMPs along the underground alignment along Morena Stokes Valley Road from Stringing Site 5 to Buckman Springs Road. At 6931, crews were observed coordinating with biological monitors (BMs) to maintain perimeter sediment control BMPs (old straw wattles were replaces with new ones) along the down slope side of Live Oak Springs Staging Yard.

To reduce fugitive dust emissions, CPUC ECMs observed construction crews watering staging yards, access roads, and workspaces in accordance with APM AIR-02. Project personnel were observed obeying the 15 mph project speed limit when traveling on unpaved roads in accordance with APM AIR-03. Crews were observed watering during trenching and access road grading work, and utilizing cuttings containment boxes during micropile drilling to reduce dust emission in accordance with APM AIR-05. To reduce dust emissions from helicopter rotor wash, crews were observed watering pole replacement workspaces in preparation for helicopter external load operations and watering fly yards/designated helicopter landing areas in accordance with the Aviation Safety Plan (ASP) (MM PHS-5).

To prevent unauthorized impacts to biological resources, approved workspaces were clearly delineated with staking and flagging, and crews were observed respecting workspace boundaries in accordance with MM BIO-1. BMs were present on site for vegetation clearing work in accordance with MM BIO-3, and were observed communicating with the clearing crews to ensure the workspace limits were understood prior to allowing work to start. BMs were also observed conducting general environmental compliance monitoring along project alignments to ensure compliance with all mitigation measures, applicant proposed measures, and permit conditions in accordance with MM BIO-22. To prevent wildlife entrapment, trenches were sloped to allow wildlife egress, and direct-bury pole holes were securely covered in accordance with MM BIO-23. To prevent attracting wildlife and littering, trash was contained and removed from sites daily in accordance with MM BIO-26.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities, and Environmentally Sensitive Areas (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 1—Attachment A). On November 27, the CPUC followed up with SDG&E regarding

drilling sediment that had breached BMPs along TL 629C and run into an adjacent ESA. Based on the CPUC ECM's observations, the breach in BMPs had not created new erosion channels and was not observed to impact the cultural resource. SDG&E confirmed through field monitoring crews that the resource had not been impacted but the BMPs had been re-stabilized in anticipated of future forecasted rain.

In accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1), dedicated fire patrols were observed inspecting areas of active construction along the project alignments to ensure fire compliance and safety, and crews were observed staging complete sets of fire tools (i.e. 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) within 50 feet of work activities. Project activities were observed complying with activity-specific CFPPP fire prevention matrix stipulations for work on and off the CNF based on the day's stated fire conditions (See Photo 2—Attachment A).

To prevent leaks and spills from being discharged into the soil in accordance with the Spill Response and Notification Plan (SRNP) and MM PHS-2, crews were observed implementing spill prevention BMPs such as the use of double-walled fuel tanks, the carrying of stocked spill kits, and the use of drip pans beneath staged equipment, fuel cans, generators, and pumps. Hazardous waste was properly stored over containment pallets in a designated hazardous waste staging areas (in yards), and barrels containing waste were labeled in accordance with the SPNP and MM PHS-2. In addition, pop-up containment was observed beneath trailers holding fuel tanks in designated helicopter staging areas in accordance with the ASP and MM PHS-5.

In accordance with the project Erosion Control Plan (ECP) and Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1, MM BIO-7) and APM HYD-09, site- specific sediment and erosion control BMPs were observed being implemented along project alignments. Fiber rolls and silt fencing were observed being maintained along rights-of-way and at staging yards and new fiber rolls, fencing, and gravel bags were observed installed along C449 (See Photo 3—Attachment A). Soil stockpiles were observed covered to prevent erosion. During micropile grouting operations, concrete waste was managed and excess concrete was not discharged onto the ground in accordance with APM HYD-01 (See Photo 4—Attachment A).

In accordance with APM NOI-02 stationary equipment was observed to be positioned in a way that would maximize its distance from residences and noise barriers were installed in accordance with MM NOI-1 (See Photo 5—Attachment A).

Traffic control measures were observed being implemented along Lyons Valley Road (TL 6957) and Old Highway 80 (TL 629C) in accordance with APM TRANS-02. Signage and cones were used for shoulder closers (See Photo 6 – Attachment A), and flaggers were utilized to temporarily hold traffic when needed, or when helicopter operations crossed or occurred next to public roadways.

In accordance with APM VIS-02, construction sites were kept as clean and inconspicuous as possible, and opaque screening was present around staging yards. New poles observed being installed were reddish-brown in color and weathered-steel in accordance with APM VIS-05, and newly installed conduit was non-specular in accordance with APM VIS-03.

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

On December 3, a Level 2 Non-Compliance (MM BIO-1) was documented by CPUC at Pole Z40568 (TL 629C). The CPUC ECM observed downed work limit staking and tire tracks over vegetation that appeared to extend beyond the approved workspace in the NTP. Upon SDG&E's re-staking of the workspace, SDG&E confirmed that the tire tracks extended beyond the approved workspace in violation of MM BIO-1. SDG&E provided a follow-up on December 12, including an accounting of disturbance resulting from the incident and corrective actions, which included reiteration of project requirements during weekly construction meetings and installation of low-profile cattle-proof landscaping nails to be used as guides to quickly re-install work limit staking as needed prior to crews mobilizing to the site.

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 sediment and erosion control BMPs. The estimated completion date is December 2018. Approximately 99% complete.

TL 629C

During this reporting period, construction crews cleared vegetation from workspaces, installed, inspected, and maintained sediment and erosion control BMPs, cleared vegetation from workspaces, mobilized equipment, drilled for, installed, and grouted micropiles, excavated direct-bury foundation and anchor holes, installed poles, installed grounding rods, and conducted overhead work. The estimated completion date is March 2019. Approximately 38% complete.

TL 629E

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

TL 682

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work, removed old poles, installed new poles, and trimmed trees. The estimated completion date is May 2019. Approximately 77% complete.

TL 6957

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work, drilled for, installed, and grouted micropiles, installed grounding rods, removed old wood poles, and conducted access road maintenance. The estimated completion date is February 2019. Approximately 70% complete.

C 157

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, assembled and framed poles, installed poles and anchors, removed old wood poles, and conducted overhead work. The estimated completion date is December 2018. Approximately 70% complete.

C 449

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, and staked delineated workspaces. The estimated completion date is August 2019. Approximately 0% complete.

ATTACHMENT A
Photos

Photo 1: Archaeological and Cultural Monitors were present during ground rod trenching at Pole Z40515 (TL629C) in accordance with the HPMP, APM CUL-04, and MM CUL-1. In addition, crew members were observed adhering to ESA fencing in accordance with the HPMP and APM CUL-03.

Photo 2: A Fire Patrol remained with the UTS tree trimming crew along the Access Road between Poles Z100048-Z100049 (TL 629C) to ensure the crew was equipped with at least 100 gallons of water with pump and hose during chipping, as required by the CFPPP Fire Matrix (MM FF-1) for the day's fire conditions (PAL D on CNF land).

Photo 3: Crews were observed trenching for the installation of silt fence, installing fiber rolls, and installing gravel bag berms along a drainage swale/area of higher velocity flow along Morena Stokes Valley Road in accordance with the ECP, SWPPP (MM HYD-1, MM BIO-7) and APM-HYD-09.

Photo 4: In accordance with APM HYD-01, concrete washout was observed to be taking place at a designated concrete washout station at Kitchen Creek Staging Yard.

Photo 5: A noise barrier was observed being utilized at Z571469 (TL 6957) in accordance with MM NOI-1 and equipment was observed positioned as far away from the house as possible in accordance with APM NOI-02.

Photo 6: In accordance with APM TRANS-02, Pro Traffic flaggers closed one lane of Lyons Valley Road to allow the staging of a PAR guard structure during fiber optic stringing between Z571432 and Z571451 (TL 6957).

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-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	Y
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
CPUC-019	November 30, 2018	Reconstruction of TL 6958 (formerly referred to as TL629D)	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)	Approved	3/12/18
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	Interset Pole on TL 682	Approved	9/24/18
022	10/16/18	Refinements to TL 6958 (formerly TL 629D)	Approved	11/30/18
023	11/15/18	Expansion of the Buckman Springs Fly Yard and addition of the Old Buckman Springs Staging Yard and Rodriguez Staging Yard	Approved, with Conditions	12/4/18