

	<p><b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting</i></b> <b><i>Program</i></b></p>
	<p><b>Cleveland National Forest Power Line Replacement</b> <b>Projects</b></p> <p><b>Compliance Status Report: 059</b></p> <p><b>December 23, 2018</b></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 December 10, 2018 through December 23, 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 Circuit (C) 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 installing temporary grounds, spreading wire, cutting a newly installed steel pole, and removing a pole top. At TL629C, crews were observed performing maintenance on sediment control Best Management Practices (BMPs); conducting staging yard set-up activities for the Buckman Springs Fly Yard expansion, Old Buckman Springs Staging Yard, and Rodriguez Staging Yard including vegetation removal, installation of fiber rolls, rattle plates and rock aprons, and installing arroyo toad perimeter fencing; setting up micropile drill platforms; trenching for ground rod installation; pressure grouting; setting pole tops; and conducting overhead line work; and conducting helicopter operations out of the Buckman Springs Fly Yard. At C449, crews were observed installing BMPs along Corral Canyon Road and trenching for a utility box; saw cutting the underground distribution line on Buckman Springs Road; trenching and installing conduit and PVC pipe along Morena Stokes Road; and pouring concrete within trenches.

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 utilizing cuttings containment boxes during micropile drilling to reduce dust emission in accordance with APM AIR-05 (See Photo 1—Attachment A). 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. Biological monitors (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, and ensuring crews were aware of a newly-implemented buffer for golden eagles (*Aquila chrysaetos*) in accordance with the Nesting Bird Management Plan (MM BIO-28). 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. Qualified monitors were observed overseeing the installation of arroyo toad (*Anaxyrus californicus*) exclusion fencing along recently approved staging yards in accordance with the project's Streambed Alteration Agreement (See Photo 2—Attachment A). 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. In accordance with MM BIO-14 and MM BIO-28, environmentally sensitive area (ESA) signs and flagging were observed around areas with special-status species.

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 3—Attachment A).

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 (See Photo 2—Attachment A). 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.

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 and maintained along project alignments. Fiber rolls were observed being installed at new staging areas, as well as new rattle plates and rock aprons at the entrances to prevent sediment track out onto paved roadways (See Photo 4—Attachment A). Crews were observed maintaining silt fencing along the right-of-ways and soil stockpiles were observed covered to prevent erosion (See Photo 5—Attachment A) in accordance with the SWPPP and Habitat Restoration Plan (MM BIO-4). During saw cutting along Old Buckman Springs Road, a vacuum was observed containing cuttings in accordance with the SWPPP (See Photo 6—Attachment A). During micropile grouting operations, concrete waste was managed and excess concrete was not discharged onto the ground in accordance with APM HYD-01.

Traffic control measures were observed being implemented in accordance with APM TRANS-02. Signage and cones were used for shoulder closers 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 visual screening was present around staging yards (See Photo 2—Attachment A). 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***

SDG&E self-reported two Level 1 Minor Deviations this reporting period. On December 18, the BMPs at Pole Z40422 on TL629C failed and drill cuttings went beyond the workspace and onto Old Highway 80 (MM HYD-1). The drill cuttings from the hillside and Old Highway 80 were cleaned and new BMPs were installed. On December 20, an SDG&E Environmental Inspector reported dried grout along Old Highway 80 between Pole Z40504 and Pole Z40506 (TL629C) that had breached the BMPs at the workspace/left the workspace at Pole Z40504 during water spraying related to a track-out clean up effort. A street sweeper cleaned the grout and replaced the BMPs at Pole Z40504.

## **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 January 2019. 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 42% complete.

### **TL 629E**

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs. The estimated completion date is January 2019. 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 78% complete.

TL 6957

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work, and installed foundations. The estimated completion date is February 2019. Approximately 75% complete.

C 157

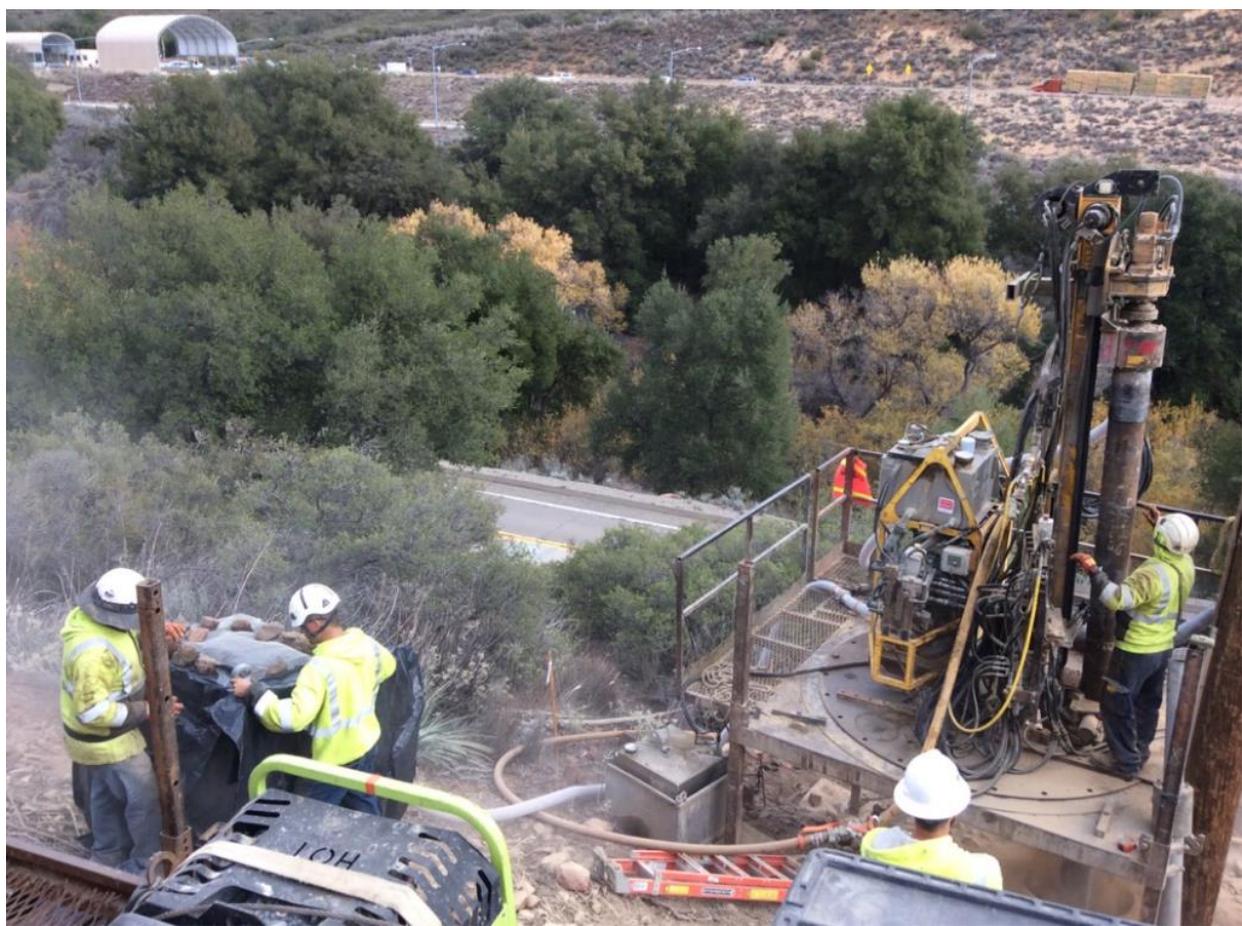
During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, assembled and framed poles, installed poles and anchors, removed old wood poles, and conducted overhead work. The estimated completion date is December 2018. Approximately 80% complete.

C 449

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, trenched for undergrounding, and installed underground duct banks, conduit, and communication boxes. The estimated completion date is August 2019. Approximately 3% complete.

## ATTACHMENT A Photos

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**Photo 1:** Crew members at Pole Z40423 (TL629C) were observed covering the drill cutting containment box to reduce dust emissions during micropile drilling in accordance with APM AIR-05.

## ATTACHMENT A (Continued)



**Photo 2:** Arroyo toad fence was observed being installed at the Buckman Springs Fly Yard expansion site in accordance with the Streambed Alteration Agreement (TL 629C). Additionally, opaque visual screening was observed along the perimeter of the yard in accordance with MM VIS-1.

## ATTACHMENT A (Continued)



**Photo 3:** Archaeological and Cultural Monitors were present during trenching along Morena Stokes Road (C449) in accordance with the HPMP, APM CUL-03, and MM CUL-1. Work was observed occurring within the delineated work limits in accordance with MM BIO-1.

## ATTACHMENT A (Continued)



**Photo 4:** In accordance with the SWPPP (MM HYD-1, MM BIO-7) crews were observed installing a rock apron and rattle plates at the entrance to the Old Buckman Springs Staging Yard to prevent sediment track out onto the paved roadway.

## ATTACHMENT A (Continued)



**Photo 5:** A topsoil stockpile near St 93+65 along Morena Stokes Road (C449) was observed securely covered with jute netting and enclosed by fiber rolls in accordance with the Habitat Restoration Plan (MM BIO-4), and Erosion Control Plan and SWPPP (MM HYD-1, MM BIO-7).

## ATTACHMENT A (Continued)



**Photo 6:** In accordance with the SWPPP (MM HYD-1, MM BIO-7), a vacuum was used to remove debris resulting from saw cutting along Buckman Springs Road. In addition, crews were equipped with a complete set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) in accordance with the CFPPP (MM FF-1).

## 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