

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 061 January 27, 2019

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 January 14, 2018 through January 27, 2019.

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 TL 625D), and TL6958 (formerly TL 625D), TL 629E, 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 629C, CPUC ECMs observed construction crews spreading wire (see Attachment A – Photo 1) and setting poles (see Attachment A – Photo 2), conducting overhead work, conducting wire stringing operations, clipping sagging, and dead ending 12 kV and 69 kV lines, and conducting helicopter operations. At TL 6957, crews were observed staging equipment at staging yards, and conducting overhead work and helicopter operations. At TL 6958, crews were observed clearing vegetation and installing erosion and sediment control Best Management Practices (BMPs) (see Attachment A – Photo 3), installing Arroyo Toad exclusionary fencing (see Attachment A – Photo 4), and setting up and drilling for micropile foundation construction (see Attachment A – Photo 5). At TL 629E, crews were observed conducting punch-list work to close out construction of the line, such as removing all construction debris and construction sediment control BMPs, grading water bars in access roads (see Attachment A – Photo 6), and re-contouring a work space.

To prevent fugitive dust emissions during project activities, construction crews were observed watering within staging yards and work areas, and along unpaved access roads as needed to prevent fugitive dust in accordance with APM AIR-02. Watering occurred in areas where helicopter operations were being conducted to prevent dust from rotor downwash in accordance with the Aviation Safety Plan (ASP) and MM PHS-5. Anti-dirt tracking control BMPs, such as rattle plates and rock aprons, were maintained at staging yard entrances, and trackout on public roads was removed in accordance with APM AIR-05. In addition, micropile drilling crews were observed utilizing cuttings containment boxes to control fugitive dust in accordance with APM AIR-05 (see Attachment A – Photo 5).

Approved workspaces were delineated with staking and flagging, and work crews were observed respecting the work space limits in accordance with MM BIO-1. Workers were observed having completed the Worker Environmental Awareness Program (WEAP), as shown by project hard hat stickers in accordance with MM BIO-2. Biological monitors were observed present on site for vegetation clearing work in accordance with MM BIO-3 (see Attachment A – Photo 3). Along TL 629E, sediment control BMPs and other construction-related debris, such as work limit and engineering stakes, were removed and work spaces were re-contoured, where necessary, in accordance with the Habitat Restoration Plan and MM BIO-4. Environmentally Sensitive Area (ESA) signage and flagging was in place to prevent impacts to sensitive plant and animal species, such as special status and/or butterfly host plant populations along rights-of-way in accordance with MM BIO-14 and MM BIO-16. An avian biologist was observed conducting pre-construction nesting raptor surveys along TL 6958, and monitoring a nesting Golden Eagle (*Aquila chrysaetos*) pair near TL 629C in accordance with the Avian Protection Plan/Nesting Bird Monitoring Plan (APP/NBMP) and MM BIO-28. To prevent wildlife entrapment, trenches and direct-bury pole holes were securely covered in accordance with MM BIO-23. To prevent littering, construction crews used trash bags which were removed from sites daily in accordance with MM BIO-26. The Arroyo Toad (*Anaxyrus californicus*) authorized biologist was observed overseeing the installation of Arroyo Toad exclusionary fencing at Pole Z40980 and Pole Z40981 (TL 629C) in accordance with the Streambed Alteration Agreement avoidance and minimization measures (see Attachment A – Photo 4).

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring project activities occurring within the vicinity of known cultural resources in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (see Attachment A – Photo 1). Environmentally Sensitive Area (ESA) fences, used to prevent unauthorized access and or construction activities in areas containing known cultural resources, were observed in working order in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, and APM CUL-05 (see Attachment A – Photo 1).

In accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1), all project related vehicles and equipment were observed carrying the required set of fire tools (including a 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher). Complete sets of fire tools were observed within 50 feet of work activities, and additional fire safety and compliance requirements, stipulated in the CFPPP Fire Prevention Matrices, were observed being implemented along rights-of-way. Designated fire patrols monitored construction activities with a higher fire risk, such as work with energized lines, and inspected fire tools and equipment to ensure it was up to date and functional. Fire boxes were observed in major operation worksites (staging yards), and included the minimum number of fire tools, including 3 shovels, 2 Pulaskis, 2 McLeods, and one 5 gallon backpack pump.

To prevent leaks and spills from being discharged into the soil, construction crews were observed implementing spill prevention BMPs in accordance with the Spill Response and Notification Plan (SRNP) and MM PHS-2. Crews were observed utilizing drip pans beneath staged equipment and stand-alone generators and pumps, carrying stocked spill kits with absorbent materials used for spill cleanup, utilizing drip pans beneath sanitary facilities, using designated hazardous material staging areas (in staging yards) equipped with secondary containment, in which barrels of hazardous waste was properly labeled, and using double-walled tanks for fuel storage. In helicopter landing areas, ground persons staged jet fuel tanks over pop-up spill containment in accordance with the ASP and MM PHS-5.

To prevent impacts to hydrology and water quality, site-specific sediment and erosion control BMPs were observed being implemented and maintained along project alignments 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. Fiber rolls and silt fencing were observed being used as perimeter controls at pole replacement sites (see Attachment A – Photo 5), along underground alignments, and in staging yards, and rattle plates and rock aprons were observed at the entrances/exits of staging yards and project access roads. Steel plates were placed over access road puddles to prevent rutting and increased erosion. Crews were observed covering soil stockpiles to prevent erosion, and covering staged equipment, materials, and waste containers at staging yards in accordance with the project SWPPP. In addition, a crew was observed maintaining water bars along TL 629E (see Attachment A – Photo 6). During concrete pouring for pole installation, concrete washout containers were used for concrete wash and waste to prevent concrete from being 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. 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.

In accordance with MM REC-2, construction personnel were observed following proper gate protocol, and locking gates authorized by the Master Special Use Permit (MSUP) immediately after ingress and egress occurred.

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 a Level 2 Non-Compliance and a Level 1 Minor Deviation in this reporting period.

On January 22, a construction crew removed Pole Z118083 (TL 682), though it was inadvertently identified as a pole-top work location in Notice to Proceed #13/Minor Project Refinement #14 maps, and the crew impacted an area 15 feet by 20 feet outside the approved/delineated work area (MM BIO-1). An SDG&E Environmental Inspector, Cultural Monitor, and Native American Monitor surveyed the impacted area for sensitive resources. The impacted area consisted of non-native grassland; no other biological resources were impacted and no aquatic resources were impacted. The Cultural and Native American monitors confirmed there were no impacts to cultural resources. The incident resulted in a Level 2 Non-Compliance.

On January 23, an SDG&E biological monitor reported tire tracks going over straw wattles and then continuing outside of the approved work limits at Pole Z40618 and the associated stringing site (TL 629C). Additionally, an SDG&E biological monitor observed a crane going beyond the approved work limits at Pole Z203063. The incidents were in violation of MM BIO-1, and a resulted in a Level 1 Minor Deviation.

As a follow-up to the non-compliances this reporting period, SDG&E met with construction upper management to discuss approved work limits and communication protocols with field crews to ensure

understanding of approved workspace delineations. Additionally, construction management will conduct additional quality control of geographic information systems data prior to submittal of NTPs/MPRs.

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 installed, inspected, and maintained sediment and erosion control BMPs, mobilized equipment, drilled for, installed, and grouted micropiles, excavated direct-bury foundation and anchor holes, assembled and framed poles, installed poles, installed grounding rods, and conducted overhead work. The estimated completion date is March 2019. Approximately 48% complete.

TL 629E

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, conducted punch-list items, and conducted site close-out items. The estimated completion date is February 2019. Approximately 99% complete.

TL 6931

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, and conducted punch-list items. The estimated completion date is February 2019. Approximately 99% complete.

TL 682

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work, and conducted punch-list items. 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, and conducted overhead work. The estimated completion date is May 2019. Approximately 78% complete.

TL 6958

During this reporting period, construction crews installed project access and environmentally sensitive area (ESA) signs, cleared vegetation within delineated work limits, and conducted micropile drilling. The estimated completion date is June 2019. Approximately 5% complete.

C 157

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, and excavated direct-bury foundations. The estimated completion date is February 2019. Approximately 90% 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 5% complete.

ATTACHMENT A Photos



Photo 1: A construction crew observed setting up a bucket truck in order to spread wire at Pole Z100051 (TL 629C). Archeological and Native American monitors were on-site monitoring the activity, and ensuring that no disturbance occurred to an adjacent cultural ESA in accordance with the HPMP, MM CUL-1, and APM CUL-04.

ATTACHMENT A (Continued)



Photo 2: A construction crew observed utilizing helicopter external load operations to set a new steel pole at Pole Z100056 (TL 629C).

ATTACHMENT A (Continued)



Photo 3: During vegetation clearing at Pole Z41019 (TL 6958), the crew was observed clearing within the approved work space in accordance with MM BIO-1, and a biological monitor was present in accordance with MM BIO-3.

ATTACHMENT A (Continued)



Photo 4: The authorized Arroyo Toad biologist observed overseeing the installation of Arroyo Toad exclusionary fence at Pole Z40981 in accordance with the SAA avoidance and minimization measures.

ATTACHMENT A (Continued)



Photo 5: During micropile foundation hole drilling at Pole Z41007, the construction crew was observed cleaning out the cuttings containment box, which is used to trap drill cuttings and control dust emissions in accordance with APM AIR-05.

ATTACHMENT A (Continued)



Photo 6: A construction crew observed conducting maintenance grading of water bars along the access road near Pole Z44170 (TL 629E) in accordance with the ECP and SWPPP. In accordance with the CFPPP for today's stated fire conditions (PAL C), a water truck provided the requisite water for fire safety (150 gallons with pump and hose), and a full set of fire tools (i.e. 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) was observed within 50 feet of the activity.

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 begin 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
024	11/26/18	Request to use the Pacific Crest Trail for access along C 449 and TL 629C	Approved	1/3/19
025	12/11/18	Bartlett Staging Yard	Approved	1/22/19