

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

Cleveland National Forest Power Line Replacement Projects

Compliance Status Report: 062

February 10, 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 28, 2019 through February 10, 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, 682, 6957 (formerly TL 625D), 6958 (formerly TL 629D), 629E, 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.

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Implementation Actions

During this reporting period at TL 629C, CPUC ECMs observed construction crews mobilizing drill equipment, removing old poles (see Photo 1 – Attachment A), conducting overhead work, setting pole bases, tying secondary wire to underground boxes, and installing and maintaining sediment control best management practices (BMPs). At TL 6957 and TL 682, crews were observed stringing wire and performing helicopter operations. Crews were also observed installing ground rods along TL 682. At TL 6958, crews were observed mobilizing drill equipment, removing and chipping vegetation, installing erosion and sediment control BMPs, drilling micropile and direct bury foundations (see Photo 2 – Attachment A), hand digging, installing ground rods and anchors, and grouting and proof testing micropile foundations. At TL 629E, crews were observed performing road maintenance activities and removing sediment and erosion control Best Management Practices (BMPs) and work space stakes at completed work areas. Crews were observed pouring concrete, installing boxes, and trenching for the underground distribution line along C 449 (see Photo 3 – Attachment A).

To prevent fugitive dust emissions during project activities, construction crews were observed watering within staging yards, work areas, and along unpaved access roads as needed in accordance with APM AIR-02. Track-out on public roads was removed in accordance with APM AIR-05 and micropile drilling crews were observed utilizing cuttings containment boxes to control fugitive dust in accordance with APM AIR-05.

Approved workspaces and access routes were delineated with staking and flagging, and work crews were observed respecting the work space limits in accordance with MM BIO-1 (see Photo 4 – Attachment A). Biological monitors were observed present on site for vegetation clearing work in accordance with MM BIO-3. The arroyo toad (*Anaxyrus californicus*) Authorized Biologist helped design screened cut-outs in the down-slope sections of arroyo toad fencing at the Buckman Springs Fly Yard for water to flow through while still providing protection for arroyo toad (see Photo 5 – Attachment A). An avian biologist was observed 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. Construction crews used trash bags, which were removed from sites daily, to prevent littering and CPUC ECMs observed crew members picking up litter within the staging areas in accordance with MM BIO-26.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring project activities occurring within the vicinity of known cultural resource sites in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04. 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. Road maintenance was performed using only hand tools within the boundaries of known cultural resource sites (see Photo 6 – Attachment A).



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.

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 and proper labeling, and using double-walled tanks for fuel storage.

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, along underground alignments, and in staging yards (see Photo 2 – Attachment A). Crews were observed covering soil stockpiles to prevent erosion in accordance with the project SWPPP. During concrete pouring for pole installation and foundation grouting, 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 along Old Highway 80 and Morena Stokes Road, in accordance with APM TRANS-02 (see Photo 3 – Attachment A). 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.

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 1 Minor Deviation in this reporting period.

On February 1, an environmental inspector (EI) observed that a mini-drill was parked outside of delineated work limits near the entrance to the Kitchen Creek Staging Yard. The EI notified the construction crew of the issue and they moved the mini-drill to the Kitchen Creek Staging Yard in accordance with MM BIO-



1. Identification of approved work limits has been reinforced during the daily tailboards with the general foremen and crews and the issue has been discussed with crew management during the weekly meetings.

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 conducted punch-list items and inspected and maintained sediment and erosion control BMPs. The estimated completion date is February 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, installed guard structures, and conducted overhead work. The estimated completion date is March 2019. Approximately 62% 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, installed poles, and conducted punch-list items. The estimated completion date is May 2019. Approximately 79% complete.

TL 6957

During this reporting period, construction crews conducted overhead work and installed, inspected, and maintained sediment and erosion control BMPs. The estimated completion date is February 2019. Approximately 85% 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, installation, and grouting. The estimated completion date is June 2019. Approximately 15% complete.

C 157

During this reporting period, construction crews conducted punch-list items and installed, inspected, and maintained sediment and erosion control BMPs. The estimated completion date is February 2019. Approximately 93% 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 9% complete.

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ATTACHMENT A Photos



Photo 1: A construction crew observed removing the old wooden pole at Z40525 (TL 629C).



Photo 2: A construction crew observed drilling direct bury pole hole at Z40999 (TL 6958). Fiber rolls used for erosion and sediment control were observed to be in good condition, in accordance with the Erosion Control Plan and SWPPP.



Photo 3: A construction crew was observed trenching for the underground distribution line along Morena Stokes Road (C 449). Traffic was regulated along the road to maintain a safe travel lane for motorists in accordance with APM TRANS-02.



Photo 4: A construction crew was observed accessing the work site at Z43043 (TL 6958) for hand digging a pole anchor hole using the approved and delineated access route in accordance with MM BIO-1.



Photo 5: The Arroyo Toad Authorized Biologist approved screened cut-outs along the down-slope sections of the arroyo toad fencing at the Buckman Springs Fly Yard to allow water flow-through and maintain protections for arroyo toad.



Photo 6: A construction crew was observed performing road maintenance with hand tools to protect cultural resources along TL 629E.

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	Υ	
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)	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	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	

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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
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)	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