

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 064 March 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 February 25, 2019 through March 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, 6957 (formerly TL 625D), 6958 (formerly TL 629D), 682, Circuits (C) 157, 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 629C, CPUC ECMs observed construction crews setting anchor blocks and poles, pulling rope, clipping and dead ending lines (see Photo 1 – Attachment A), and conducting helicopter operations. At the Rodriguez Staging Yard, crews were observed installing a water barrier, repairing, and moving the perimeter fence line. Crews were also observed cutting an old steel pole at TL 6957 (see Photo 2 – Attachment A). At TL 6958, crews were observed drilling and proof testing micropile foundations (see Photo 3 – Attachment A), trimming rebar and installing caps, grouting, spreading wire, staging poles, drilling direct bury foundations, removing spoils piles following excavation, and conducting helicopter operations. At TL 682, crews were observed framing poles, installing a transformer, hanging travelers, pulling wire (see Photo 4 – Attachment A), removing silt fence, installing hydromulch, and conducting helicopter operations. Crews were observed conducting helicopter operations to demobilize equipment and remove spoils piles at work sites along C 157 (see Photo 5 – Attachment A). At C 449, CPUC ECMs also observed crews drilling for direct bury foundations, stabilizing drill holes with slurry, installing anchors and grounding wire, removing and chipping vegetation, installing sediment and erosion control Best Management Practices (BMPs), trenching and installing conduit underground, and backfilling trenches and grading along Buckman Springs Road (see Photo 6 – Attachment A).

To prevent fugitive dust emissions during project activities, construction crews were observed watering within staging yards 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. In addition, micropile drilling crews were observed utilizing cuttings containment boxes to control fugitive dust in accordance with APM AIR-05.

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. 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. To prevent wildlife entrapment, trenches and direct-bury pole holes were securely covered in accordance with MM BIO-23. The arroyo toad (*Anaxyrus californicus*) authorized biologist surveyed at Pole Z40981 along TL 6958 where arroyo toad fencing was removed temporarily for equipment access to the work area in accordance with the Streambed Alteration Agreement avoidance and minimization measures. The arroyo toad authorized biologist was also consulted during temporary arroyo toad fencing installation in preparation for repair activities at the perimeter fence of the Rodriguez Staging Yard.

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. 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.

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, including hot work activities associated with the cutting of the old steel pole at Z571453 along TL 6957 (see Photo 2 – Attachment A).

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 and carrying stocked spill kits with absorbent materials used for spill cleanup.

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, and rattle plates and rock aprons were observed at the entrances/exits of staging yards and project access roads. 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. While pouring concrete slurry from the mix truck to transport vehicles, crews placed drip cloths below the pouring activity 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.

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 March 6, a bucket truck slid off the access road to Pole Z118075 on TL 682, impacting an area that totaled approximately 120 square feet. The impacted area was inspected by an Environmental Inspector, archaeological monitor, and Native American monitor. No identified resources were located within 50 feet of the impacted area and no impacts to cultural resources within the area were observed. The Environmental Inspector recorded damage to native grasses, two California buckwheat (*Eriogonum fasciculatum*) plants, and two California sagebrush (*Artemisia californica*) plants. The incident was in violation of MM BIO-1, and a resulted in a Level 1 Minor Deviation.

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 March 2019. Approximately 99% complete.

TL 629C

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, installed and removed poles, installed ground rods, and conducted overhead work. The estimated completion date is March 2019. Approximately 85% 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 March 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 March 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 conduit, and removed poles and backfilled pole holes. The estimated completion date is May 2019. Approximately 84% complete.

TL 6957

During this reporting period, construction crews 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, inspected, and maintained sediment and erosion control BMPs; conducted micropile drilling, installation, testing, capping, trimming, and grouting; installed ground rods; and excavated pole foundations. The estimated completion date is June 2019. Approximately 25% complete.

C 157

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

C 449

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; trenched for undergrounding; installed underground duct banks, conduit, and communication boxes; cleared vegetation within delineated work spaces; installed arroyo toad exclusion fencing; and excavated direct-bury pole holes. The estimated completion date is August 2019. Approximately 18% complete.

ATTACHMENT A Photos



Photo 1: A construction crew was observed conducting human external cargo operations to assist with dead ending the 69 kV line at Z40509 (TL 629C).

ATTACHMENT A (Continued)



Photo 2: A dedicated fire patrol was observed wetting down surrounding vegetation prior to the commencement of hot work at Pole Z571453 (TL 6957), in accordance with the CFPPP Fire Matrix.

ATTACHMENT A (Continued)



Photo 3: A construction crew was observed removing steel beams used for micropile foundation proof testing at Z40997 (TL 6958).

ATTACHMENT A (Continued)



Photo 4: A temporary guard structure was observed near Pole Z118073 (TL 682) to protect the road from wire that may sag during the pulling process.

ATTACHMENT A (Continued)



Photo 5: Helicopter external load operations were used to demobilize equipment and remove spoils piles from Pole P278719 (C 157).

ATTACHMENT A (Continued)



Photo 6: A construction crew was observed backfilling and grading along Buckman Springs Road following trenching and underground installation.

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
026	2/22/19	Refinements to TL 629A	Pending	
027	3/1/19, Revised 3/8/19	Expansion of the Cameron Staging Yard	Pending	
028	3/7/19	Underground workspaces at three existing pole locations on C 449	Pending	