

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 066 April 7, 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 March 25, 2019 through April 7, 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) 6958 (formerly TL 629D), TL 682, 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 C 449, CPUC ECMs observed construction crews conducting work for the underground portion of the 12kV line including trenching, installing shoring, installing PVC pipe and

conduit, pouring slurry, and conducting hot work such as grinding, welding, and saw cutting (see Photo 1 – Attachment A). Additionally, ECMs observed crews installing stream diversion water catchment, tubing and associated Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) such as sand and gravel bags, rip rap, and filtration fabric at the historic bridge and jurisdictional drainage crossing (see Photo 2 – Attachment A). Crews were observed drilling and digging for direct-bury pole locations, pole setting, trenching for and installing ground rods, using helicopter external load operations for placement of construction materials at sites, and conducting site clean up at various pole locations (see Photo 3 – Attachment A). At TL 6958, construction crews were observed spreading wire in preparation for pole setting and stringing 12kV wire drilling for new direct bury poles, setting and framing poles, wrecking out old poles, and clipping fiber optic lines (see Photo 4 & 5 – Attachment 4). At TL 682, crews were observed sagging and dead ending fiber optic lines, removing wooden mats and crane pads used for erosion control/rutting mitigation at temporary access/entry roads, preparing to setup for wire stringing activities, and clipping 69 kV wire (see Photo 6 – Attachment A).

To prevent fugitive dust emissions during project activities, construction crews were observed watering along unpaved access roads and staging areas as needed to prevent fugitive dust. In some cases where water observed in direct-bury pole locations, water was pumped via a vacuum and transported to locations where helicopter operations were being conducted to prevent dust from rotor downwash in accordance with the Aviation Safety Plan (ASP), MM PHS-5, and MM AIR-2 (see Photo 3 – Attachment A).

Approved workspaces were observed delineated with staking and flagging, and work crews were generally observed adhering to 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 and Biological Monitors (BMs) were observed at work sites along the right-of-way in accordance with MM BIO-3 and MM BIO-22. ECMs observed the arroyo toad (*Anaxyrus californicus*) Authorized Biologist directing inspections of arroyo toad exclusionary fence along TL 6958 in accordance with APM BIO-5. Environmentally Sensitive Area (ESA) signage and flagging was observed in place along the right-of-way 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. An avian biologist was observed monitoring active red-tailed hawk nests at TL 6958 in accordance with the APP/NBMP and MM BIO-28 (see Photo 4 - Attachment A).

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring project activities occurring within the vicinity of known cultural resources along C 449 and TL 682 in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (see Photo 1 – Attachment A). Environmentally Sensitive Area (ESA) fences used to prevent unauthorized access and or construction activities in areas containing known cultural resources were observed in place per the HPMP.

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 the rights-of-way. An on-site water truck was observed during road maintenance/grading on Buckman Springs Road during pole work along TL 6958. Designated fire patrols were observed monitoring hot work activities along the right-of-ways and areas surrounding these activities were wetted in accordance with the CFPPP matrices.

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), 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 (see Photo 5 – Attachment A). Jute netting was observed being utilized to stabilize the ephemeral stream channel along C 449. Crews were observed covering soil stockpiles to prevent erosion in accordance with the project SWPPP, such as at Pole Z258869 along C 449 prior to pole setting (see Photo 3 – Attachment A). 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. BMPs such as street sweepers were observed being used to remove paving debris from the surface within Mountain Empire school grounds in accordance with the SWPPP. On April 5, the CPUC ECM notified the on-site BM of sediment that had breached the fiber rolls along the western perimeter of the workspace when a crane's outriggers pushed the soil over the top of the rolls. The BM directed the crew to scoop up the sediment and bring it back into the work space, and scheduled BMP maintenance due to the sediment load present on the fiber rolls.

Traffic control measures were observed being implemented in accordance with APM TRANS-02 by CPUC ECMs on several occasions during this reporting period. Traffic control signage indicating the closure of Cameron Truck Trail (for through traffic) was documented at the intersection with Buckman Springs Road and pilot vehicles were observed leading traffic along temporary lane closures during underground activities along C449 in accordance with the Traffic Control Plan. Additionally, traffic personnel were observed directing one-way traffic around staged equipment along Highway 76 during wire clipping along (TL 682) in accordance with APM TRANS-02 (see Photo 6 – Attachment A).

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

No non-compliance issues occurred during this reporting period.

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. Completion pending final inspection. The estimated completion date is April 2019. Approximately 99% complete.

TL 629C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, and completed punch-list items and clean-up. The estimated completion date is April 2019. Approximately 95% complete.

TL 629E

During this reporting period, construction crews conducted punch-list items. Completion pending final inspection. The estimated completion date is April 2019. Approximately 99% complete.

TL 6931

Completion pending final inspection. The estimated completion date is April 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 applied hydromulch. The estimated completion date is May 2019. Approximately 88% complete.

TL 6957

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, and conducted punch-list items. Completion pending final inspection. The estimated completion date is April 2019. Approximately 97% complete.

TL 6958

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, and conducted overhead work. The estimated completion date is June 2019. Approximately 50% complete.

C 157

During this reporting period, construction crews removed sediment and erosion control BMPs. The estimated completion date is April 2019. Approximately 99% complete.

C 449

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; trenched for undergrounding; installed underground duct banks, conduit, and communication boxes; cleared vegetation within delineated work limits; installed ground rods and anchors; and excavated direct-bury pole holes. The estimated completion date is August 2019. Approximately 35% complete.

C79

During this reporting period, construction crews conducted geotechnical boring. This Project component is approximately 100% complete.

ATTACHMENT A Photos



Photo 1: Construction crews were observed trenching for the installation of 12 kV underground line at C449. Due to the presence of a cultural resources ESA within 50 feet, an archeological and Native American monitor were observed inspecting excavated soils in accordance with the HPMP, MM CUL-1, and APM CUL-04.

ATTACHMENT A (Continued)



Photo 2: Construction crews were observed installing culvert pipe to carry water over the area of stream planned for trenching/underground 12kV installation (C449). BMPs were observed installed to prevent the downstream discharge of silty/turbid water in accordance with the SAA. A BM was observed monitoring the activity in accordance with MM BIO-22. An archeological monitor was observed monitoring the activity to ensure there were no impacts to the historic bridge in accordance with the HPMP.

ATTACHMENT A (Continued)



Photo 3: A construction crew was observed pumping groundwater out of the pole excavation at P258869 (C 449) prior to pole setting. A Biological Monitor was present in accordance with MM BIO-22 and the spoils stockpile was observed to be securely covered in accordance with the Erosion Control Plan and SWPPP. The water was transported in the vacuum machine to Buckman Springs Fly Yard, where it was dispersed for dust control in accordance with APM AIR-02.

ATTACHMENT A (Continued)



Photo 4: During pole setting activities at Z40989 (TL 6958), the Lead Environmental Inspector was observed monitoring a nearby red-tailed hawk (*Buteo jamaicensis*) nest for signs of disturbance in accordance with the APP/NBMP and MM BIO-28.

ATTACHMENT A (Continued)



Photo 5: Construction crews were observed drilling for a direct bury pole hole at Z409970. Silt fence was observed in good condition in accordance with the SWPPP.

ATTACHMENT A (Continued)



Photo 6: During 69 kV wire clipping at Z115713 (TL 682), traffic personnel directed one way traffic around staged equipment along Highway 76 in accordance with APM TRANS-02.

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	Intersect 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	Approved	3/12/19
028	3/7/19	Underground workspaces at three existing pole locations on C 449	Approved	3/12/19