

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 071 June 16, 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 June 3, 2019 through June 16, 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) 629A, Circuit (C) 449, C 440 Phase I, 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 along TL 629A, CPUC ECMs observed construction crews readying work spaces by trimming trees, clearing ground vegetation, and installing Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) at pole sites, stringing sites, and staging yards. Crews were observed conducting micropile foundation drilling, setting pole bases, installing ground rods and anchors, and spreading wire (see Photos 1 and 2 – Attachment A). Along C 449, ECMs observed construction crews re-paving along Buckman Springs Road where previous vault work was conducted, excavating for an intercept, and tightening and securing pole anchors at various pole sites (see Photo 3 – Attachment A). Additionally, ECMs observed construction crews conducting overhead work, which included sagging, dead ending, and clipping 12 kV wire. Along C 440 Phase I, construction crews were observed surveying and marking workspaces, installing sediment and erosion BMP, and clearing vegetation in preparation for upcoming vault installation activities (see Photo 4 – Attachment A).

To prevent fugitive dust emissions during project activities, construction crews were observed watering down access routes and active construction areas in accordance with APM AIR-02 (see Photo 5 – Attachment A) and street sweeping to remove mud and debris from Sunrise Highway (C 440). Project personnel were observed maintaining posted speeds of 15 miles per hour on unpaved roads in accordance with APM AIR-03 and MM BIO-24.

Approved workspaces were observed delineated with staking and flagging, and work crews were observed adhering to work space limits and staying on approved access roads 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 conducting full-time monitoring of initial ground-disturbing activities on TL 629A while vegetation clearing and SWPPP BMP installation took place in accordance with MM BIO-3 (see Photo 1 – Attachment A). During inspections of the Rodriguez Staging Yard and the Anderson Staging Yard, the CPUC ECM observed trash at the entrances but observed trash being collected and removed within the same day in accordance with MM BIO-26; other work areas were observed to have trash contained. ECMs observed construction crews avoiding Environmentally Sensitive Areas (ESA) and signage and flagging were observed present in accordance with MM BIO-14, MM BIO-16, and MM BIO-28 along C 440 and TL 629A. Additionally, approved avian biologists were observed monitoring active nests and surveying ahead of construction crews along C 440, C 449, and TL 629A in accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) and MM BIO-28.

CPUC ECMs observed cultural resource monitors, including archaeological and Native American Monitors, monitoring construction activities occurring within or adjacent to identified archaeological or cultural resource site boundaries in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (see Photo 4 – Attachment A).

In accordance with the Construction Fire Protection/Prevention Plan (CFPPP) (MM FF-1, MM BIO_6), 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) and these tools were observed within 50 feet of work activities (see Photo 4 – Attachment A). Designated fire patrols with 100-150 gallons of water were observed mobilized along TL 629A, C 449, C 440 while construction crews performed overhead work, tree trimming, vegetation removal, and wire stringing activities in accordance with the fire prevention matrix in the CFPPP.

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. Visqueen and drip pans were observed to be utilized under stationary generators and heavy equipment to prevent leaks and spills of hazardous liquids (see Photo 6 – Attachment A).

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 SWPPP (MM HYD-1, MM BIO-7) and APM HYD-09. Fiber rolls and silt fencing were observed being used as perimeter controls at vegetation clearing sites, pole replacement sites, and at intercept installation sites along TL 629A, C 449, and C 440 (see Photos 2 through 5 – Attachment A). Soil stock piles were observed secured with fiber rolls and covering for erosion control in accordance with the ECP and SWPPP. Additionally, cut materials following saw cutting at C 449 were observed to be cleaned from the road using a vacuum and street sweeper in accordance with the ECP and SWPPP.

During this reporting period, micropile drilling took place in proximity to a private residences along TL 629A. Portable noise barriers were observed being set up to surround the drill to minimize noise in accordance with MM NOI-1.

Traffic control measures were observed being implemented along TL 629A and C 440 during this reporting period. While setting pole bases on segment TL 629A, crews were observed while utilizing cones, signage, and traffic flaggers to maintain a safe travel corridor for motorists in accordance with APM TRANS-02 (see Photo 2 – Attachment A). Additionally, traffic control signage along Corral Canyon Truck Trail on C 440 was observed in accordance with the Traffic Control Plan (TCP) (APM TRANS-05) (see Photo 5 – 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. New poles observed being installed were reddish-brown in color and weathered-steel in accordance with APM VIS-05.

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 MMCRP.

Compliance Status

On June 14th, an SDG&E environmental inspector observed that a concrete tube form at a project work area on C449 was improperly covered and a dead Dulzura kangaroo rat (*Dipodomys simulans*) was found at the bottom of the form. The incident violated MM BIO-23 and resulted in a Level 1 Minor Deviation. The importance of properly covering excavations and holes was reiterated during tailboard meetings.

CONSTRUCTION SCHEDULE AND PROGRESS

San Diego Gas & Electric (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

Completion pending final inspection and punch-list items. The estimated completion date is June 2019. Approximately 99% complete.

TL 629A

During this reporting period, construction crews installed sediment and erosion control BMPs, as well as Project access and ESA signs; removed vegetation and trimmed trees within delineated work areas; drilled for, grouted, and tested micropile foundations; installed anchors, grounding rods, and poles; and conducted road maintenance and overhead work. The estimated completion date is July 2020. Approximately 8% complete.

TL 629C

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

TL 629E

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

TL 6931

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

TL 682

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, conducted punch-list work, and applied hydro-mulch to the Cucca Loop Staging and Fly Yard. The estimated completion date is July 2019. Approximately 97% complete.

TL 6957

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

TL 6958

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, removed wooden poles, and conducted punch-list work. The estimated completion date is June 2019. Approximately 93% complete.

C 157

During this reporting period, construction crews mowed Stringing Site 01 and conducted punch-list work. The estimated completion date is June 2019. Approximately 99% complete.

C 449

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs and cleaned conduit. Additionally, crews conducted paving and overhead work. The estimated completion date is August 2019. Approximately 82% complete.

C 440 Phase I

During this reporting period, construction crews installed sediment and erosion control BMPs, marked vault and alignment boundaries, and saw-cut pavement. The estimated completion date is May 2020. Approximately 0% complete.

ATTACHMENT A Photos



Photo 1: A biological, archaeological, and Native American monitor were observed monitoring vegetation removal and chipping on the temporary access road to Pole Z40494 (TL 629A) in accordance with MM BIO-3, the HPMP, MM CUL-1, and APM CUL-04.

ATTACHMENT A (Continued)



Photo 2: A construction crew was observed setting the pole base at Pole Z172804 (TL 629A). Cones, signage, and traffic flaggers were used to maintain a safe travel corridor for motorists in accordance with the Traffic Control Plan and APM TRANS-02. Arroyo toad exclusion fencing was observed in good condition with gravel bags in accordance with arroyo toad avoidance and minimization measures (APM BIO-03).

ATTACHMENT A (Continued)



Photo 3: During excavation work to install intercepts at P161903 (C 449), perimeter fiber rolls were observed functional in accordance with the ECP and SWPPP. A complete set of fire tools was staged on site (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) in accordance with the CFPPP (MM FF-1).

ATTACHMENT A (Continued)



Photo 4: While a construction crew was performing vegetation clearing at a vault along C 440, ESA signs were posted to notify crews that cultural resource monitoring was required at this location per Appendix A of the HPMP. Staking and flagging clearly delineated approved workspace in accordance with MM BIO-1.

ATTACHMENT A (Continued)



Photo 5: A water truck was observed being used to control fugitive dust emissions along Corral Canyon Truck Trail in accordance with APM AIR-02 and APM AIR-05. Traffic control signage was also observed along the road in accordance with the Traffic Control Plan.

ATTACHMENT A (Continued)



Photo 6: Visqueen was observed staged beneath a stationary generator at a C 440 staging yard for drip and spill protection in accordance with the SRNP and MM PHS-2.

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
CPUC-020	April 19, 2019	Reconstruction of TL 629A	Y
CPUC-021	May 29, 2019	Reconstruction of C79A	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	Approved	4/19/19
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

ATTACHMENT C

Minor Project Refinement Request

029	3/28/19	Refinements to C79A	Approved	5/29/19
030	3/29/19	Modify Route to Pole P45476 (C449)	Approved	4/05/19
033	5/17/19	Convert Staging areas 2 and 2A from staging to staging and fly yards (C440)	Approved	6/04/19