

	<b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting Program</i></b>
	<b>Cleveland National Forest Power Line Replacement Projects</b>  <b>Compliance Status Report: 027</b>  <b>October 2, 2017</b>

## 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 September 18 through October 2, 2017.

## MITIGATION MONITORING, COMPLIANCE, AND REPORTING

### *Site Inspections/Mitigation Monitoring*

A CPUC third-party environmental compliance monitor conducted site observations in areas under active construction, which included Transmission Line (TL) 6931, TL 682, Circuit (C) 78, and associated Staging 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, and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

### *Implementation Actions*

During this reporting period along TL 6931, CPUC ECMs observed construction crews conducting overhead work, conducting distribution wire stringing activities (See Photo 1—Attachment A), and

removing old wooden poles. Along TL 682, CPUC ECMs observed drilling and grouting for micropile foundations and drilling pole holes/installing direct embed poles (See Photo 2—Attachment A). Additionally crews were observed trimming oaks mid-span to maintain required transmission line clearances, clearing vegetation and installing sediment and erosion control Best Management Practices (BMPs), installing Stephens' kangaroo rat exclusion barrier around pole replacement workspaces, and refueling helicopters at Mendenhall Fly Yard. Along C 78, crews were observed clearing vegetation and installing erosion control BMPs (See Photo 3—Attachment A), and digging/drilling pole holes.

During this reporting period, CPUC ECMs observed implementation of dust control measures along the rights-of-way, including application of water to control dust on access roads and in pole replacement workspaces and staging yards (APM AIR-02). 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. BMPs designed to minimize dirt trackout onto public roads such as rattle plates and rock aprons were observed at the ingress and egress of staging yards in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1, APM HYD-09, and MM BIO-7). During helicopter external load operations at the Lake Henshaw Staging Yard (TL 682), which included mobilization of equipment and materials for transport to remote pole replacement work sites, watering occurred to manage and control dust in accordance with the Aviation Safety Plan (MM PHS-5) (See Photo 4—Attachment A).

During construction activities, crews were observed adhering to delineated work limits and working within existing access roads in accordance with MM BIO-1. In accordance with MM BIO-3 and MM BIO-22, biological monitors were observed conducting full time monitoring of initial ground-disturbing activities and vegetation clearing that were occurring along TL 682 and C 78 and monitoring other work activities to ensure compliance with mitigation measures, plans, and permits. To prevent impacts to butterfly host plants along C 78, biological monitors flagged spiny redberry located within the workspaces in accordance with MM BIO-16, and directed clearing crews to leave shrubs in place (See Photo 5—Attachment A). To prevent wildlife entrapment along C 78 and TL 682, crews were observed securely covering completed pole holes in accordance with MM BIO-23. Approved Stephens' kangaroo rat (SKR) biologists were observed monitoring the construction of SKR exclusion barrier at pole replacement sites within SKR habitat along TL 682 (eastern end), trapping SKR within the exclusion barriers installed around pole sites, and flagging SKR burrows along the access road for avoidance in accordance with MM BIO-31.

In accordance with the Habitat Restoration Plan (MM BIO-4), stockpiles of salvaged topsoil were observed along the right-of-ways for future use during restoration activities. On September 20, a biological monitor notified the CPUC third party ECM that restoration personnel would not be collecting succulent plant species along C 78 as SDG&E has previously done on during construction on other transmission lines, because collecting the requisite number needed for the future habitat restoration activities had been achieved (Habitat Restoration Plan, MM BIO-4).

Cultural resource monitors, including archaeological and Native American monitors, were observed monitoring ground disturbing activities such as pole hole drilling/auguring, and inspecting excavated

soils for potential sensitive cultural resources along TL 682 in accordance with MM CUL-1. Cultural resource monitors were also observed surveying workspaces for sensitive cultural resources prior to construction activities (See Photo 6—Attachment A) and were observed spot checking cultural ESA fencing installed to prevent unauthorized access into areas with previously recorded cultural resources in accordance with the Historic Properties Management Plan (HPMP). Signage indicating where old poles would be cut at the base and remain in place to prevent undue ground disturbance in accordance with the HPMP recommendations were observed. In accordance with APM CUL-08, a paleontological monitor was observed monitoring pole hole drilling/auguring along both TL 682 and C 78 and inspecting excavated soils for the presence of fossils.

During construction activities along all rights-of-way, construction fire patrols were observed inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1) (See Photo 2—Attachment A). Crews were observed staging the required fire tools and equipment based on the Project Activity Level (on CNF land)/Fire Potential Index (off CNF land) and the construction activity being performed as allowed in the Fire Prevention Matrices CFPPP (MM FF-1, APM HAZ-01). On September 27, a CPUC third party ECM notified the SDG&E Lead Environmental Inspector (LEI) that an SKR exclusion barrier installation crew at Pole Z118194 (TL 682) had a square point shovel instead of the required round point shovel staged with their other fire tools (i.e. a 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher). The SDG&E LEI said that he would remind the crew of the round point shovel requirement and remedy the issue.

Site-specific erosion and sediment control BMPs continued to be observed along the project rights-of-way in accordance with the project SWPPP (MM HYD-1, APM HYD-09, and MM BIO-7). BMPs designed to prevent off-site erosion and sedimentation included the use of fiber rolls, silt fencing, and prowattle. In addition, dirt stockpiles were watered and/or covered and surrounded with fiber rolls. At some mountain side pole replacement sites along the TL 682 alignment, rock fence was used in addition to silt fence to provide rock erosion protection and silt fence fortification. To prevent dirt/mud from being tracked onto paved or public roadways, rattle plates and rock aprons were in place at the ingress and egress with project access roads and staging yards, and a street sweeper was utilized on public roads when needed. On September 27, a biological monitor informed the CPUC third party ECM that during pole hole drilling activities at Pole Z118163 (TL 682), sediment had breached the perimeter prowattle. The biological monitor said that the issue was reported, and that a BMP maintenance crew was contacted to clean up any sediment that had been pushed outside of the work limits, and to repair the perimeter prowattle.

To prevent unauthorized leaks/spills from being discharged into the soil, fuel and other hazardous materials were observed stored in double walled tanks or above secondary containment in accordance with MM PHS-2 and the project SWPPP. Drip pans were observed beneath small fuel canisters, small combustion engines, staged equipment in staging yards, and sanitary facilities. BMPs for grouting activities were observed being implemented during this reporting period in accordance with the SWPPP and APM HYD-01 and included the use of visqueen sheets beneath staged concrete/grouting equipment and concrete washout containers.

Implementation of traffic control measures continued to be observed in this reporting period. Traffic control measures, such as the placement of signage and cones as well as the use of flagpersons were observed in accordance with APM TRANS-02. During helicopter external load operations along TL 682, traffic control notification signs, cones, and flagpersons were observed being utilized to temporarily stop traffic when loads were transported over public roads, including Highway 76 and East Grade Road. Signage, cones, and flagperson were also utilized along C 78 to direct traffic around construction vehicles and equipment staged on one side of Viejas Grade Road (See Photo 3—Attachment A).

In accordance with APM VIS-02, construction activities were observed being kept as clean and inconspicuous as possible and opaque mesh used as a visual screen was observed around the perimeter of staging areas.

### ***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***

CPUC third-party environmental monitors observed overall compliance with mitigation measures throughout the reporting period. No non-compliances were reported or observed 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 work and site cleanup. The estimated completion date is October 2017. Approximately 95% complete.

### **TL 629E**

During this reporting period, construction crews maintained erosion control BMPs, conducted punch-list work, and conducted site cleanup. The estimated completion date is January 2018. Approximately 90% complete.

### **TL 6931**

During this reporting period, construction crews maintained erosion control BMPs, conducted overhead work, connected underground electric work, and removed old poles. The estimated completion date is November 2017. Approximately 85% complete.

#### TL 682

During this reporting period, construction crews completed Lake Henshaw Staging Yard and Mendenhall Fly Yard, drilled and grouted foundations, installed poles, conducted overhead wire spreading, cleared workspaces and installed BMPs, maintained erosion control BMPs, and constructed and maintained Stephens' kangaroo rat exclusion barriers. The estimated completion date is November 2018. Approximately 5% complete with construction, with a completion date of November 2018. Approximately 50% complete with geotechnical activities, with a completion date of October 2017.

#### C 78

During this reporting period, construction crews cleared workspaces and installed erosion control BMPs. The estimated completion date is December 2017. Approximately 2% complete.

## ATTACHMENT A Photos

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**Photo 1:** A construction crew observed conducting overhead line work in preparation for distribution line wire stringing at Pole P45927 (TL 6931).

## ATTACHMENT A (Continued)



**Photo 2:** Pole hole drilling observed at Pole Z118221 (TL 682) within Stephens' kangaroo rat exclusion barrier (MM BIO-31). A fire patrol was observed monitoring construction activities in accordance with the Construction Fire Prevention/Protection Plan (MM FF-1, APM HAZ-1).

## ATTACHMENT A (Continued)



**Photo 3:** Vegetation clearing activities observed along C78. Traffic control notification signage, cones, and flagpersons were observed along Viejas Grade Road in accordance with APM TRANS-02.



## ATTACHMENT A (Continued)



**Photo 4:** Helicopter external load operations were observed being conducted out of Lake Henshaw Staging Yard (TL 682) to assist foundation drilling and grouting operations at remote site along the project alignment. To prevent potential dust emissions from rotor wash in accordance with the Aviation Safety Plan (MM PHS-5), a water truck was utilized to apply water within the work area.

## ATTACHMENT A (Continued)

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**Photo 5:** During vegetation clearing along C 78, a spiny redberry was flagged and avoided to prevent impacts to butterfly host plants in accordance with MM BIO-16.

## ATTACHMENT A (Continued)



**Photo 6:** Cultural resource monitors were observed surveying the pole replacement workspace along TL 682 for sensitive cultural resources ahead of planned ground disturbing construction activities in accordance with the Historic Properties Management Plan, MM CUL-1, and APM CUL-04.

## ATTACHMENT B Notices to Proceed

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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

## ATTACHMENT C

### Minor Project Refinement Request

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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