

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p>
	<p>Cleveland National Forest Power Line Replacement Projects</p> <p>Compliance Status Report: 042</p> <p>April 29, 2018</p>

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 April 16, 2018 through April 29, 2018.

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) 682 and 629E, 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 TL682, construction activities observed by Dudek third- party ECMs included vegetation clearing and tree trimming; dead-ending of transmission lines; helicopter operations

for equipment, crew, and pole transport (See Photo 1 – Attachment A); drill set-up and drilling for poles and micropiles; installing grounding rods; conducting wire stringing activities; and installing BMPs for sediment control. Along TL 629E, crews were observed excavating holes for pole anchors.

During this reporting period, CPUC ECMs observed implementation of dust control measures including the application of water on access roads and in work areas in accordance with APM AIR-02 (See Photo 2 – Attachment A). 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. Track-out was not observed along paved access roads in accordance with APM AIR-05.

During construction activities, crews were observed adhering to delineated work limits and working within existing access roads in accordance with MM BIO-1. Construction crews were observed collecting trash and disposing of it in covered dumpsters, in accordance with MM BIO-26. In accordance with MM BIO-3 and MM BIO-22, SDG&E biological monitors were observed conducting full-time monitoring of initial ground-disturbing activities as well as vegetation clearing. In accordance with the Avian Protection Plan/Nesting Bird Management Plan and MM BIO-28, avian biologists were observed surveying for nesting raptors ahead of scheduled work activities along TL 682.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground-disturbing activities (See Photo 3 – Attachment A). Cultural resources monitors inspected excavated soils for potential sensitive cultural resources in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04. In addition, cultural resources environmental sensitive areas (ESAs) were fenced to prevent unauthorized access into areas with previously recorded cultural resources (See Photo 4 – Attachment A).

During construction activities, construction fire patrols were observed inspecting sites for compliance with the CFPPP and MM FF-1. Construction 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 CFPPP Fire Prevention Matrices. A set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) was observed at active construction sites in accordance with APM HAZ-01 and APM HAZ-04 (See Photo 5 – Attachment A).

To prevent leaks and spills from being discharged into the soil in accordance with the Spill Response and Notification Plan (MM PHS-2), crews were observed implementing spill prevention BMPs including the use of secondary containment beneath hazardous materials and fuel tanks, double walled fuel tanks, drip pans beneath staged equipment and sanitary facilities, and spill kits.

Site-specific erosion and sediment control BMPs continued to be observed along the project rights-of-way in accordance with the project Storm Water Pollution Prevention Plan (SWPPP), MM HYD-1, MM BIO-7, and APM HYD-09. Sediment control BMPs including fiber rolls, silt fencing, and prowattle were observed at pole replacement sites and staging yards (See Photo 6 – Attachment A).

In accordance with APM TRANS-02, traffic control measures were implemented. Traffic control measures, including the placement of signage and cones as well as the use of flag persons were observed along Highway 76.

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.

A Level 1 Minor Deviation was observed on April 17, 2018 along TL 682. The Dudek third-party environmental compliance monitor observed that during drill set up activities, a 5-gallon backpack pump was not included among the fire tools required on site (MM FF-1; MM BIO-6; APM HAZ-04). The Lead Environmental Inspector was informed and the 5-gallon backpack pump was brought to the work site prior to activities resuming.

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 cleanup activities. The estimated completion date is May 2018. Approximately 99% complete.

TL 629E

During this reporting period, construction crews inspected and maintained erosion control BMPs, completed foundation work, and conducted punch-list work. The estimated completion date is May 2018. Approximately 87% complete.

TL 6931

During this reporting period, construction crews inspected and maintained erosion control BMPs, and conducted punch-list work. The estimated completion date is May 2018. Approximately 99% complete.

TL 682

During this reporting period, construction crews drilled pole holes, grouted, capped, and tested micropiles, installed poles and grounds, removed and/or topped poles, conducted overhead work and stringing activities, cleared work areas, and inspected and maintained erosion control BMPs. The estimated completion date is November 2018. Approximately 35% complete.

TL 629C Geotechnical Work (On Hold)

During this reporting period, no work occurred. The estimated completion date is May 2018. Approximately 10% complete.

C 442

During this reporting period, construction crews removed silt fences and straw wattle, removed spoil piles, removed project signage, applied hydro-mulch, and conducted punch-list work. The estimated completion date is May 2018. Approximately 99% complete.

ATTACHMENT A Photos



Photo 1: A crew is observed dead-ending transmission lines at Z118145 (TL 682). A helicopter was used to transport linemen to the tower using human external cargo operations in accordance with the Aviation Safety Plan and MM PHS-5.

ATTACHMENT A (Continued)



Photo 2: During grounding rod installation at TL 682, a crew member waters down spoils before backfilling in order to reduce fugitive dust emissions in accordance with APM AIR-02.

ATTACHMENT A (Continued)



Photo 3: A crew digs a trench with hand tools to install grounding rods at pole Z118035 (TL 682) with biological and archaeological monitors present, in accordance with MM BIO-3, MM CUL-1, and APM CUL-04.

ATTACHMENT A (Continued)



Photo 4: During drill site setup at a pole site along TL 682, a cultural ESA fence was observed installed around the perimeter of the workspace by the archeological monitor, in accordance with the HPMP and MM CUL-1. A containment box was staged on site to catch drill cuttings and reduce dust emissions in accordance with APM AIR-02.

ATTACHMENT A (Continued)



Photo 5: A crew is observed removing vegetation at Pole Z118074 (TL 682). Fire tools were observed within 50 feet of activity in accordance with the Construction Fire Protection and Prevention Plan (MM FF-1). Native American and biological monitors were present to observe vegetation clearing and removal in accordance with MM BIO-3, APM CUL-04, and the HPMP.

ATTACHMENT A (Continued)



Photo 6: At Z44226 (TL 629E), perimeter fiber rolls were observed installed in accordance with the Erosion Control Plan and SWPPP.

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

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)	Pending	
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