

	<p><b>California Public Utilities Commission</b>  <b><i>Mitigation Monitoring, Compliance, and Reporting</i></b>  <b><i>Program</i></b></p>
	<p><b>Cleveland National Forest Power Line Replacement</b>  <b>Projects</b></p> <p><b>Compliance Status Report: 054</b></p> <p><b>October 14, 2018</b></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 October 1, 2018 through October 14, 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) 629C, 682, 6957 (formerly TL625D), and Circuit (C) 157, 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 682, CPUC ECMs observed construction crews excavating new pole holes, cutting existing/old steel poles and removing them, spreading wire and installing new poles, sagging and dead-ending newly installed distribution lines (See Photo 1 – Attachment A), staging equipment in preparation for fiber optic line stringing, conducting helicopter external load operations, re-contouring old work areas, managing sediment spoils, and maintaining erosion control best management practices (BMPs). At TL 6957, crews were observed drilling, installing rebar, grouting, proof-testing, and capping for micropile foundations, installing grounding, cutting existing/old steel poles and removing them, and installing new poles and conducting helicopter external load operations (See Photo 2 – Attachment A). At C 157 crews were observed excavating new pole holes (See Photo 6 – Attachment A), letting down de-energized lines and installing new poles, installing grounding, wrecking out old wire, removing old poles, stringing new wire, sagging and clipping wire, and conducting helicopter external load operations. At TL 629C, crews were observed clearing vegetation and installing erosion control BMPs (See Photo 4 – Attachment A), perforating, drilling, and installing gravel for new pole holes, drilling and proof testing for micropile foundations, and conducting helicopter external load operations.

CPUC ECMs observed construction crews reducing dust emissions by watering access roads, work areas, and staging in accordance with APM AIR-02, and project vehicles and equipment were observed traveling less than 15 MPH along unpaved access roads in accordance with APM AIR-03. To reduce dust from helicopter rotor wash, helicopter water drops were observed at remote sites along TL 6957 in accordance with MM AIR-05 (See Photo 5 – Attachment A), and fly yards were routinely watered using water trucks in accordance with the Aviation Safety Plan and MM PHS-05. During micropile drilling, dust control BMPs were observed being implemented, including the addition of water into the drill hole and the use of dust containment systems to capture fine/dusty drill cuttings in accordance with APM AIR-05.

During construction activities, approved work spaces were delineated with flagging and/or staking, and crews were observed respecting the work space limits in accordance with MM BIO-1. Prior to vegetation clearing activities, biological monitors were observed communicating the extent of the approved work space limits to clearing crews to prevent un-authorized impacts outside of the work space in accordance with MM BIO-1. During vegetation clearing, Biological Monitors (BMs) were observed on-site for full time monitoring in accordance with MM BIO-3. BMs were observed monitoring all construction activities to ensure compliance with all environmental mitigation measures, regulations, and permit conditions in accordance with MM BIO-22. Pole hole excavations were observed being securely covered to prevent wildlife entrapment in accordance with MM BIO-23, and trash was contained and removed from work sites daily in accordance with MM BIO-26. Where benches were dug out of a sloped work space for level equipment staging at Pole Z118096 (TL 682), a construction crew was observed re-contouring the slope to near pre-construction condition in accordance with Habitat Restoration Plan and MM BIO-4.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities, and ESAs were marked to prevent unauthorized access into areas with previously recorded cultural resources in accordance with the Historic Properties Management Plan

(HPMP), MM CUL-1, MM CUL-3, APM CUL-04, and APM CUL-05 (See Photos 4 and 6 – Attachment A).

CPUC ECMs observed fire patrols inspecting sites for compliance with the Construction Fire Prevention/Protection Plan (CFPPP) and MM FF-1 throughout the reporting period (See Photo 6 – Attachment A). Dedicated fire patrols were observed on-site for hot work such as the cutting of old steel poles, for overhead work with energized lines such as wire spreading, and were observed conducting 1 hour fire watches at those sites after work completion. Construction crews were observed staging a set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC extinguisher) within 50 feet of work activities, and staging the required activity-specific fire tools and equipment based on the days stated fire conditions as described in the CFPPP Fire Prevention Matrices (See Photos 3, 4, and 6 – 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 BMP's such as the use of double walled fuel tanks, the carrying of stocked spill kits, the use of drip pans beneath staged equipment, fuel cans, generators, and pumps (See Photo 3 – Attachment A), and use of absorbent pads during equipment maintenance and under hydraulic fluid line connection points.

In accordance with the project Storm Water Pollution Prevention Plan (SWPPP), Erosion Control Plan, and APM HYD-09, site-specific sediment and erosion control BMPs were observed being implemented along project alignments. Fiber rolls and silt fencing were observed being maintained along rights-of-way, and soil stockpiles were covered to prevent erosion. Groundwater containment systems were utilized to prevent silt containing runoff during micropile drilling along TL 629C. At TL 629C, fiber rolls and silt fencing were observed being installed to ready pole replacement sites for construction activities, while at TL 682, prowattle was installed to ready a stringing site. For long-term erosion control along TL 682, crews were observed applying hydro mulch and installing erosion control matting at sites where construction activities were complete.

In accordance with APM TRANS-02, traffic control measures, including the placement of signage and cones as well as the use of flag persons were observed being implemented as necessary. Traffic was observed being temporarily stopped during helicopter external load operations, when they passed over or near public roadways, such as Highway 76 (TL 682), Lyons Valley Road and Carveacre Road (TL 6957), and Old Highway 80, Buckman Springs Road, and Old Buckman Springs Road (TL 629C).

In accordance with APM VIS-02, construction sites were kept as clean and inconspicuous as possible, and opaque 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, and newly installed conduit was non-specular in accordance with APM VIS-03.

### ***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***

On October 4, a Level 1 Minor Deviation was reported by the CPUC third party ECM, after a construction crew was observed clearing vegetation at Pole Z40529 on TL 629C without a BM being present. The event resulted in a deviation from MM BIO-3, which requires that a BM is present during vegetation clearing.

## **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 erosion control BMPs. The estimated completion date is October 2018. Approximately 99% complete.

### **TL 629 C**

During this reporting period, construction crews cleared work areas, installed, inspected, and maintained sediment and erosion control BMPs, mobilized equipment, drilled for and installed micropiles, conducted utility potholing, excavated direct-bury pole holes, and installed direct-bury poles. The estimated completion date is March 2019. Approximately 17% complete.

### **TL 629E**

During this reporting period, construction crews inspected and maintained erosion control BMPs. The estimated completion date is December 2018. Approximately 99% complete.

### **TL 682**

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, applied hydro-mulch, removed old wooden poles, conducted overhead work, conducted stringing operations, and conducted pole inspections. The estimated completion date is February 2019. Approximately 72% complete.

TL 6957

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, excavated direct-bury pole holes, drilled for, installed, grouted, and tested micropiles, removed old poles, installed poles, conducted overhead work, removed old wooden poles, and conducted access road maintenance. The estimated completion date is December 2018. Approximately 43% complete.

C157

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, cleared work areas, excavated direct-bury pole foundation holes and anchor holes, installed direct-bury poles, grounds, and anchors. The estimated completion date is December 2018. Approximately 40% complete.

## ATTACHMENT A Photos

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**Photo 1:** A CPUC ECM observed a wire stringing construction crew dead-ending new 12 kV conductor wire at Pole Z118111 along TL 682.

## ATTACHMENT A (Continued)

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**Photo 2:** A crew observed installing a new steel pole top at Pole Z571421 (TL 6957).

## ATTACHMENT A (Continued)



**Photo 3:** While inspecting a micropile drill site at Pole Z571459 (TL 6957), the ECM observed a water pump staged over a drip pan to prevent the release of hazardous materials onto the ground in accordance with the Spill Response and Prevention Plan and MM PHS-2. In addition, a complete set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) was staged within 50 feet of work activities in accordance with the Construction Fire Prevention/Protection Plan (CFPPP), MM FF-1, and APM HAZ-04, and a trash bag was used to contain trash throughout the day in accordance with MM BIO-26.



## ATTACHMENT A (Continued)



**Photo 4:** During vegetation clearing at Pole Z40510 (TL 629C), the construction crew staged a set of fire tools within 50 feet of work activities in accordance with the CFPPP, MM FF-1, and MM HAZ-04. The work space was surrounded by a ESA (rope and signage) and archeological and Native American monitors were present on-site during work activities in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, APM CUL-03, and APM CUL-04, and APM CUL-05.

## ATTACHMENT A (Continued)

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**Photo 5:** In order to minimize dust emissions from helicopter rotor wash during pole setting at Pole Z571449 (TL 6957), water was dropped on the site prior to pole delivery in accordance with APM AIR-05.

## ATTACHMENT A (Continued)



**Photo 6:** In accordance with the HPMP, MM CUL-1, and APM CUL-04, an Archaeological Monitor (pictured) and Cultural Monitor (present but out of frame) were present during pole hole excavation at Pole P278749 (C 157). A Fire Patrol was also present in accordance with the CFPPP.

## 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

## 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
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