

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i></p>
	<p>Cleveland National Forest Power Line Replacement Projects</p> <p>Compliance Status Report: 055</p> <p>October 28, 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 October 15, 2018 through October 28, 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 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 6957, CPUC ECMs observed construction crews drilling, setting rebar, grouting, and capping for micropile foundations (See Photo 1 – Attachment A); trenching and installing grounding; spreading and transferring wire to create overhead space needed for helicopter operations at pole locations; conducting wire work, framing poles, setting new poles, and transferring wire to new poles; and conducting helicopter operations. At TL 629C, crews were observed mobilizing equipment and setting up drill platforms, drilling, setting rebar, grouting, and proof-testing for micropile foundations; trenching and installing grounding (See Photo 2 – Attachment A); perforating new pole holes, drilling and excavating new direct bury pole holes (See Photo 3 – Attachment A), and grading dirt spoil into existing access roads; clearing vegetation and installing sediment control Best Management Practices (BMPs) to ready sites for construction (See Photo 4 – Attachment A); conducting helicopter operations; trimming oak trees for pole and line clearance; spreading transmission and distribution lines, lowering fiber optic lines, and framing and installing new steel poles (See Photo 5 – Attachment A). At TL 682, crews were observed removing poles and pole anchors (See Photo 6 – Attachment A), conducting helicopter operations, and performing quality control inspections remotely with a drone.

To reduce fugitive dust emissions, CPUC ECMs observed construction crews watering staging yards, access roads, and workspaces in accordance with APM AIR-02. Project personnel were observed obeying the 15 mph project speed limit when traveling on unpaved roads in accordance with APM AIR-03. Crews were observed watering during trenching and access road grading work (See Photo 2 – Attachment A), and utilizing cuttings containment boxes during micropile drilling to reduce dust emission in accordance with APM AIR-05. To reduce dust emissions from helicopter rotor wash, crews were observed watering pole replacement workspaces in preparation for helicopter external load operations and watering fly yards/designated helicopter landing areas in accordance with the Aviation Safety Plan (ASP) (MM PHS-5).

To prevent unauthorized impacts to biological resources, approved workspaces were clearly delineated with staking and flagging, and crews were observed respecting workspace boundaries in accordance with MM BIO-1. Biological monitors (BMs) were present on site for vegetation clearing work in accordance with MM BIO-3, and were observed communicating with the clearing crews to ensure the workspace limits were understood prior to allowing work to start (See Photo 4 – Attachment A). BMs were also observed conducting general environmental compliance monitoring along project alignments to ensure compliance with all mitigation measures, applicant proposed measures, and permit conditions in accordance with MM BIO-22. To prevent wildlife entrapment, trenches were sloped to allow wildlife egress, and direct-bury pole holes were securely covered in accordance with MM BIO-23. To prevent attracting wildlife and littering, trash was contained and removed from sites daily in accordance with MM BIO-26.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities, and Environmentally Sensitive Areas (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.

In accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1), dedicated fire patrols were observed inspecting areas of active construction along the project alignments to ensure fire compliance and safety, and crews were observed staging complete sets of fire tools (i.e. 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) within 50 feet of work activities (See Photo 1 – Attachment A). Project activities were observed complying with activity-specific CFPPP fire prevention matrix stipulations for work on and off the CNF based on the day's stated fire conditions. Dedicated fire patrols were observed monitoring overhead wire work involving energized lines, such as wire spreading, and hot work, such as the cutting of an old/existing pole for removal (See Photo 5 and Photo 6 – Attachment A). Construction crews were equipped with 150 gallons of water (with pump and hose) and were observed wetting down work areas sufficiently to prevent ignitions during trenching and grading work (See Photo 2 – Attachment A). Combustion engines/compressors were given the required 5 feet of clearance from vegetation and other fuels, and a complete set of fire tools were staged with each stand alone engine/compressor. For micropile drilling work at remote sites on the CNF on days with Project Activity Levels (PALs) of E with a variance (Ev), water buffalos holding at least 150 gallons of water (with pump and hose) were flown in, and a dedicated fire patrol was observed present during the work activity. During vegetation chipping at remote workspaces, tanks with 100 gallons of water (with pump and hose) were flown in, and the area was watered to prevent ignition.

To prevent leaks and spills from being discharged into the soil in accordance with the Spill Response and Notification Plan (SRNP) and MM PHS-2, crews were observed implementing spill prevention BMPs such as the use of double-walled fuel tanks, the carrying of stocked spill kits, and the use of drip pans beneath staged equipment, fuel cans, generators, and pumps. Hazardous waste was properly stored over containment pallets in a designated hazardous waste staging areas (in yards), and barrels containing waste were labeled in accordance with the SPNP and MM PHS-2. In addition, pop-up containment was observed beneath trailers holding fuel tanks in designated helicopter staging areas in accordance with the ASP and MM PHS-5.

In accordance with the project Erosion Control Plan (ECP) and Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1, MM BIO-7) 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 (See Photo 3 – Attachment A), and soil stockpiles were covered to prevent erosion. Groundwater containment systems were utilized to prevent silt 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. At direct bury excavation sites, excavated soils were covered with plastic sheets on site or spoils were gathered and flown off site to prevent erosion. During micropile grouting operations, concrete waste was managed and excess concrete was not discharged onto the ground in accordance with APM HYD-01.

Traffic control measures were observed being implemented along 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 TRANS-02. Signage and cones were used for shoulder closers (See Photo 5 – Attachment A), and flaggers were utilized to temporarily hold traffic when needed, or when helicopter operations crossed or occurred next to public roadways. A pilot car was observed being utilized along Old Highway 80 (TL 629C) to control one-way traffic and to lead motorists around construction activities.

In accordance with MM REC-2, access roads on the CNF authorized for project use were observed closed and locked after ingress and egress of project personnel, unless permanently manned by a worker. On 10/26/18, the project LEI informed the CPUC ECM of a reported cut CNF gate lock and that an SDG&E site representative would be replacing the lock by end of day to maintain proper gate protocols in accordance with MM REC-2.

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

Two Level 1 Minor Deviations were self-reported by SDG&E for work that occurred beyond the allowable construction hours stipulated by MM NOI-4 (7:00 a.m. to 7:00 p.m.) at Barrett Substation (TL 625B) on October 26 and 27.

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 sediment and erosion control BMPs. The estimated completion date is December 2018. Approximately 99% complete.

TL 629C

During this reporting period, construction crews cleared vegetation from workspaces, installed, inspected, and maintained sediment and erosion control BMPs, mobilized equipment, drilled for, installed, and grouted micropiles, excavated direct-bury foundation and anchor holes, and installed poles. The estimated completion date is March 2019. Approximately 17% complete.

TL 629E

During this reporting period, construction crews inspected and maintained sediment and 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, removed old poles, conducted overhead work, 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, capped, and tested micropiles, removed old poles, installed poles, conducted overhead work. The estimated completion date is December 2018. Approximately 43% complete.

C 157

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, 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.

C 449

No construction activities were conducted during this reporting period. The estimated completion date is August 2019. Approximately 0% complete.

ATTACHMENT A Photos



Photo 1: A construction worker observed installing a micropile foundation cap at Pole Z571460 (TL 6957). A complete set of fire tools, including a 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher, were located on-site in accordance with the CFPPP (MM FF-1) and APM HAZ-04.

ATTACHMENT A (Continued)



Photo 2: A construction crew observed trenching for the installation of grounding at Pole Z40535 (TL 629C). As required by the CFPPP (MM FF-1) for trenching work during fire conditions for the day, the construction crew was equipped with 150 gallons of water (with pump and hose), and was observed watering the area to prevent ignition. The area was also watered to reduce dust emissions in accordance with APM AIR-02 and APM AIR-05.

ATTACHMENT A (Continued)



Photo 3: A construction crew observed excavating a direct-bury pole hole at Pole Z40464 (TL 629C). Sediment control BMPs (fiber rolls) were observed along the downslope side of the workspace to prevent off-site erosion in accordance with the ECP and SWPPP (MM HYD-1, APM HYD-09, MM BIO-7).

ATTACHMENT A (Continued)



Photo 4: A construction crew observed clearing vegetation within the approved workspace for Pole Z40423 (TL 629C). A biological monitor was present on site for the vegetation clearing work in accordance with MM BIO-3, and was observed communicating with the construction crew about the delineated workspace limits to ensure all impacts to vegetation occurred within the approved workspace in accordance with MM BIO-1.

ATTACHMENT A (Continued)



Photo 5: A construction crew spreading wire and installing a new pole at Pole Z40556 (TL 629C). A dedicated fire patrol was present for the work with energized lines in accordance with the CFPPP for the day's stated fire conditions. Traffic control personnel were observed implementing a lane closure along Old Highway 80, and utilizing a pilot car to guide motorists around the construction activity in accordance with APM TRANS-02.

ATTACHMENT A (Continued)



Photo 6: A construction crew observed cutting an existing/old steel pole for removal at Pole Z118088 (TL 682). A dedicated fire patrol was present on-site for the hot work as required by the CFPPP (MM FF-1) for the day's stated fire conditions.

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)	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	Interset Pole on TL 682	Approved	9/24/18