	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 056** **November 11, 2018**

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 29, 2018 through November 11, 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 and 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, and grouting micropile foundations; trenching and installing grounding; spreading and transferring wire to create overhead space needed for helicopter operations at pole locations; conducting wire work, framing poles, and setting new poles; conducting helicopter operations (See Photo 1 – Attachment A); clearing vegetation from work areas; and removing old wood poles. At TL 629C, crews were observed drilling for micropile foundations, trenching and installing grounding, drilling and excavating new direct bury pole holes, clearing and chipping vegetation (See Photo 2 – Attachment A), installing sediment control Best Management Practices (BMPs) (See Photo 3 – Attachment A), conducting helicopter operations, trimming oak trees for pole and line clearance (See Photo 4 – Attachment A), spreading transmission and distribution lines, and framing and installing new steel poles.

To reduce fugitive dust emissions, CPUC ECMs observed construction crews watering staging yards, access roads, and workspaces in accordance with APM AIR-02. Crews were observed watering during trenching 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).

ECMs worked in the field with crews and environmental monitors to ensure approved workspaces were clearly delineated with staking and flagging. 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 (See Photo 2 – 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 (See Photo 2 – Attachment A).

In accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1), dedicated fire patrols were observed inspecting areas of active construction including hot work activities along the project alignments to ensure fire compliance and safety. CPUC ECMs also observed crews 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. 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. During vegetation chipping at remote workspaces, tanks with 100 gallons of water (with pump and hose) were flown or driven into the work area and the area was watered to prevent ignition (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 (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. 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 installed along project alignments (See Photo 3 – Attachment A). At direct bury excavation sites, excavated soils were covered with plastic sheets on site or spoils were gathered and removed 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 Old Highway 80 in accordance with APM TRANS-02 (See Photo 6 – Attachment A). Signage and cones were used for shoulder closers, and flaggers and pilot cars were utilized to temporarily hold and direct traffic when needed.

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 replaced the lock by end of day to maintain proper gate protocols in accordance with MM REC-2. During this reporting period, ECMs continued discussions with the project LEI regarding this issue and it was determined that the cut lock was not project related and no additional action was necessary.

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

SDG&E provided Non-Compliance Report #2 dated November 2, 2018 to document 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 as well as work that had occurred beyond allowable construction hours along TL 682 on October 18, and to detail corrective actions taken by SDG&E management.

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; installed poles; conducted overhead work; and trimmed trees. The estimated completion date is March 2019. Approximately 20% 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 cleared vegetation from workspaces. The estimated completion date is May 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; installed poles; and conducted overhead work. The estimated completion date is February 2019. Approximately 55% complete.

C 157

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs and removed spoils. The estimated completion date is January 2019. Approximately 45% 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 CPUC ECM observed installation of the middle segment of Pole Z571428 (TL 6957) using a helicopter.

Photo 2: A construction crew observed clearing vegetation at Pole Z40507 (TL 629C). A biological monitor was present to explain the workspace limits in accordance with MM BIO-1 and MM BIO-3. An archaeological monitor was also observed onsite to explain the work limits as they related to cultural resources in the vicinity in accordance with the HPMP, MM CUL-1, APM CUL-03, and APM CUL-04.

Photo 3: A construction crew observed installing silt fence at Z40506 (TL 629C) in accordance with the Erosion Control Plan and SWPPP (MM HYD-1, MM BIO-7) .

Photo 4: A construction crew observed trimming a nearby oak at Z40539 (TL 629C) for pole installation and line clearance.

Photo 5: During vegetation chipping at Pole Z206014S (TL 629C), the crew was equipped with at least 100 gallons of water with a pump and hose, as required by the CFPPP Fire Matrix for the activity, location, and FPI.

Photo 6: A construction crew observed conducting a lane closure along Old Highway 80 between Z40529 and Z100056 (TL 629C) and using a pilot car to lead motorists around construction areas in accordance with APM TRANS-02.

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

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