	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 060 January 13, 2019

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 December 31, 2018 through January 13, 2019. Construction activities did not occur between December 23, 2018 and January 2, 2019.

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, TL 682, 6957 (formerly TL625D) and Circuit (C) 157, C 449, 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 629C, CPUC ECMs observed construction crews clearing vegetation, installing caps and proof-testing for micropiles, installing grounding wire and rods, spreading wire and conducting overhead work, setting poles and backfilling (See Photo 1 – Attachment A), flying sockline and pulling 12 kV distribution lines, installing underground conduit, and conducting helicopter operations. At TL 682, crews were observed conducting wire stringing operations for both 69 kV transmission and 12 kV distribution line installations (See Photo 2 – Attachment A) and conducting helicopter operations assisting in those activities. In addition, a crew was observed maintaining sediment and erosion control Best Management Practices (BMPs) identified in the Storm Water Pollution Prevention Plan (SWPPP). At TL 6957, crews were observed conducting 12 kV distribution line stringing work (See Photo 3 – Attachment A) including helicopter operations supporting those activities. In addition, a crew was observed maintaining and installing new sediment and erosion control BMPs. At C 157, a crew was observed hand digging a pole hole, extracting water from the pole hole, backfilling for a pole anchor, and conducting helicopter external load operations in support of those activities (See Photo 5 – Attachment A). At C 449, crews were observed trenching, and installing pipe casing and underground conduit (See Photo 6 – Attachment A).

To prevent fugitive dust emissions during project activities, construction crews were observed watering within staging yards and work areas, and along unpaved access roads as needed to prevent fugitive dust in accordance with APM AIR-02. Anti-dirt tracking control BMPs, such as rattle plates and rock aprons, were maintained at staging yard entrances, and trackout on public roads was removed in accordance with APM AIR-05.

To prevent unauthorized impacts to sensitive biological resources, approved workspaces were delineated with staking and flagging, and work crews were observed respecting the work space limits in accordance with MM BIO-1. Topsoil, collected during grading work, was observed stockpiled and secured for later use in accordance with the Habitat Restoration Plan and MM BIO-4. Biological monitors were also observed inspecting project construction activities along rights-of-way to ensure compliance with measures in the MMCRP (See Photos 2 and 6 – Attachment A). Environmentally Sensitive Area (ESA) signage and flagging were in place to prevent impacts to sensitive plant and animal species along rights-of-way in accordance with MM BIO-14 and MM BIO-16, including a nesting Golden Eagle (*Aquila chrysaetos*) pair near TL 629C in accordance with the Avian Protection Plan/Nesting Bird Monitoring Plan (APP/NBMP) and MM BIO-28. To prevent wildlife entrapment direct-bury pole holes were observed to be securely covered in accordance with MM BIO-23.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring ground disturbing activities and conducting spot checks for project activities occurring within the vicinity of known cultural resources in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (See Photos 1 and 6 – Attachment A). ESA fences, used to prevent unauthorized access and or construction activities in areas containing known cultural

resources, were observed in working order in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, and APM CUL-05.

In accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1), all project related vehicles and equipment were observed carrying the required complete set of fire tools (i.e. 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) (See Photo 4 – Attachment A). Complete sets of fire tools were observed within 50 feet of work activities, and additional fire safety and compliance requirements, stipulated in the CFPPP Fire Prevention Matrices, were observed being implemented along rights-of-way. Designated fire patrols monitored construction activities with a higher fire risk, such as work with energized lines, and inspected fire tools and equipment to ensure it was up to date and functional.

To prevent leaks and spills from being discharged into the soil, construction crews were observed implementing spill prevention BMPs in accordance with the Spill Response and Notification Plan (SRNP) and MM PHS-2. Crews were observed utilizing drip pans beneath staged equipment and stand-alone generators and pumps, carrying stocked spill kits with absorbent materials used for spill cleanup, and using double-walled tanks for fuel storage.

To prevent impacts to hydrology and water quality, site- specific sediment and erosion control BMPs were observed being implemented and maintained along project alignments in accordance with the project Erosion Control Plan (ECP) and SWPPP (MM HYD-1, MM BIO-7), and APM HYD-09. Fiber rolls, pro wattle, and silt fencing were observed being used as perimeter controls at pole replacement sites, along underground alignments, and in staging yards. Steel plates were placed over access road puddles to prevent rutting and increased erosion. Crews were observed covering soil stockpiles to prevent erosion, and covering waste containers in accordance with the SWPPP. Erosion control mats were observed being utilized for long term erosion control in areas where construction is largely complete. During concrete pouring for pole installation, concrete washout containers were used for concrete wash and waste and visqueen was placed under hose joints carrying concrete while filling pole holes to prevent concrete from being discharged onto the ground in accordance with APM HYD-01 and MM PHS-2.

Traffic control measures were observed being implemented in accordance with APM TRANS-02. Signage and cones were used for shoulder closers and flaggers were utilized to temporarily hold traffic when needed (See Photo 3 – Attachment A) or when helicopter operations crossed or occurred next to public roadways.

In accordance with MM REC-2, construction personnel were observed following proper gate protocol, and locking gates authorized by the MSUP immediately after ingress and egress occurred.

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 self-issued a non-compliance this reporting period. On January 8, crews worked beyond the permitted hours at poles Z40534 through Z40540 along TL 629C. In order to complete work required to be completed on January 8 to safely secure the line prior to restoring power to customers in the area, crews worked until 10:30 pm on the right-of-way and personnel left the Anderson Staging yard by 11:00pm. This incident was out of compliance with MM NOI-4. Commitments to better communication and planning between crews and SDG&E have been made to avoid future incidents.

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 January 2019. Approximately 99% complete.

TL 629C

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, mobilized equipment, drilled for, installed, and grouted micropiles, excavated direct-bury foundation and anchor holes, assembled and framed poles, installed poles, installed grounding rods, and conducted overhead work. The estimated completion date is March 2019. Approximately 42% complete.

TL 629E

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, and conducted punch-list items. The estimated completion date is January 2019. Approximately 99% complete.

TL6931

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs. The estimated completion date is January 2019. Approximately 99% complete.

TL 682

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work, and conducted punch-list work. The estimated completion date is May 2019. Approximately 78% complete.

TL 6957

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work, and conducted punch-list work. The estimated completion date is February 2019. Approximately 80% complete.

TL 6958

During this reporting period, construction crews installed project access and ESA signs. The estimated completion date is June 2019. Approximately 0% complete.

C 157

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, excavated direct-bury foundations, installed poles and anchors, removed old wood poles, and conducted overhead work. The estimated completion date is February 2019. Approximately 85% complete.

C 449

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, trenched for undergrounding, and installed underground duct banks, conduit, and communication boxes. The estimated completion date is August 2019. Approximately 3% complete.

ATTACHMENT A Photos



Photo 1: During pole setting at Pole Z100055 (TL 629C), biological, archeological, and Native American monitors were present in accordance with MM BIO-22, the HPMP, MM CUL-1, and APM CUL-04.

ATTACHMENT A (Continued)



Photo 2: During 69 kV transmission line stringing operations at TL 682, a crew was observed sagging and dead ending wire at Pole Z118076 and the associated stringing site.

ATTACHMENT A (Continued)



Photo 3: During 12 kV distribution line stringing activities along TL 6957, such as sagging and dead ending wire at Pole Z571424 (pictured), traffic notification signage was set out and traffic control personnel were observed flagging traffic around staged equipment along Carveacre Road in accordance with APM TRANS-02.

ATTACHMENT A (Continued)

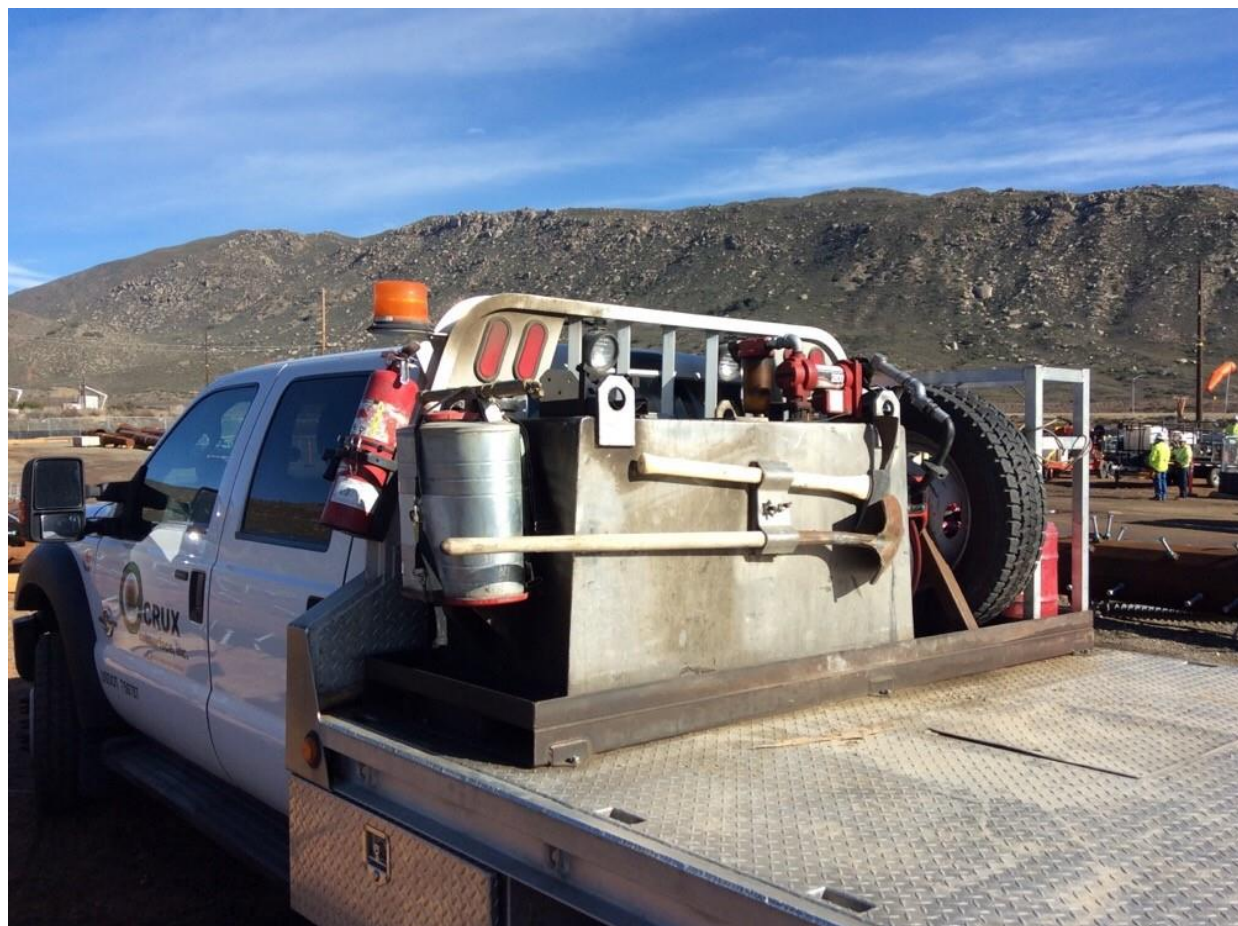


Photo 4: In accordance with the CFPPP, all project vehicles were observed with a complete set of fire tools, including a 5 gallon backpack pump, round point shovel, pulaski, and 2A10BC fire extinguisher. Picture taken at Buckman Springs Staging Yard (TL 629C).

ATTACHMENT A (Continued)



Photo 5: During pole hole excavation and anchor hole backfilling at Pole P278750 (C 157), a helicopter was utilized to transport equipment to and from the remote site using helicopter external load operations in accordance with the Aviation Safety Plan and MM PHS-5.

ATTACHMENT A (Continued)



Photo 6: During trenching for the installation of underground conduit along C 449, biological, archeological, and Native American monitors were present in accordance with MM BIO-22, the HPMP, MM CUL-1, and APM CUL-04. Fiber rolls, installed as a sediment control BMP along the limits of construction, were observed in functional condition in accordance with the ECP, SWPPP, and APM HYD-09.

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
CPUC-019	November 30, 2018	Reconstruction of TL 6958 (formerly referred to as TL629D)	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
022	10/16/18	Refinements to TL 6958 (formerly TL 629D)	Approved	11/30/18
023	11/15/18	Expansion of the Buckman Springs Fly Yard and addition of the Old Buckman Springs Staging Yard and Rodriguez Staging Yard	Approved, with Conditions	12/4/18
024	11/26/18	Request to use the Pacific Crest Trail for access along C 449 and TL 629C	Approved	1/3/19