

	<b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting Program</i></b>
	<b>Cleveland National Forest Power Line Replacement Projects</b>  <b>Compliance Status Report: 063</b>  <b>February 24, 2019</b>

## 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 February 11, 2019 through February 24, 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, 682, 6957 (formerly TL 625D), 6958 (formerly TL 629D), 629E, Circuits (C) 449, 157, and the associated staging/fly yards including the Bartlett Staging Yard. 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 CPUC ECMs observed construction crews installing grounds and performing maintenance activities at sediment and erosion control Best Management Practices (BMPs) along TL 629C and 6958 (see Photo 1 – Attachment A). Also along TL 629C, crews were observed setting poles (see Photo 2 – Attachment A), pouring direct bury foundations (see Photo 3 – Attachment A), spreading wire, clipping and dead ending lines, performing underground work, installing sediment and erosion control BMPs, and conducting helicopter operations. At TL 6958, crews were also observed drilling for micropile foundations, grouting, and digging for anchors. During this reporting period, crews implemented punch-list work to close out construction including sediment and erosion control BMP removal and re-contouring at finished worksites along C 157 and TL 629E (see Photo 4 – Attachment A). At TL 682, crews were observed removing sediment from paved roads, maintaining erosion and sediment control BMPs, and pulling wire. Along TL 6957, crews were observed conducting road maintenance activities, sagging and clipping fiber line, and conducting helicopter operations to remove old pole butts. Crews were also observed trenching for underground distribution line on Buckman Springs Road (see Photo 5 – Attachment A), grinding for steel plate installation, and installing silt fence and arroyo toad (*Anaxyrus californicus*) fencing along C 449. Construction crews were also observed establishing the Bartlett Staging Yard including fence installation, erosion and sediment control BMP installation, vegetation clearing, and grading at entrances and exits (see Photo 6 – Attachment A).

To prevent fugitive dust emissions during project activities, anti-dirt tracking control BMPs, such as rattle plates and rock aprons, were maintained at staging yard entrances, and track-out and sediment on public roads was removed in accordance with APM AIR-05. CPUC ECMs also observed watering within staging yards, work areas, and along unpaved access roads as needed in accordance with APM AIR-02 and micropile drilling crews were observed utilizing cuttings containment boxes in accordance with APM AIR-05.

Approved workspaces were delineated with staking and flagging, and work crews were observed respecting the work space limits in accordance with MM BIO-1. Workers were observed having completed the Worker Environmental Awareness Program (WEAP), as shown by project hard hat stickers in accordance with MM BIO-2. Biological monitors were observed present on site for vegetation clearing work in accordance with MM BIO-3 (see Photo 6 – Attachment A). Along TL 629E and C 157, sediment control BMPs and other construction-related debris, such as work limit and engineering stakes, were removed and work spaces were re-contoured, topsoil was replaced, and hydromulch/seeding was installed where necessary, in accordance with the Habitat Restoration Plan and MM BIO-4. Environmentally Sensitive Area (ESA) signage and flagging was in place to prevent impacts to nesting bird species observed and monitored along C 449, in accordance with the Avian Protection Plan/Nesting Bird Monitoring Plan (APP/NBMP) and MM BIO-28. To prevent wildlife entrapment, trenches and direct-bury pole holes were securely covered in accordance with MM BIO-23. The arroyo toad authorized biologist was observed overseeing the installation of arroyo toad exclusionary fencing along C 449 in accordance with the Streambed Alteration Agreement avoidance and minimization measures.

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring 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. Environmentally Sensitive Area (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 set of fire tools (including a 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher). 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 (see Photo 6 – Attachment A). Fire boxes were observed in major operation worksites (staging yards), and included the minimum number of fire tools, including 3 shovels, 2 Pulaskis, 2 McLeods, and one 5 gallon backpack pump.

To prevent leaks and spills from being discharged into the soil, construction crews were observed implementing spill prevention BMPs and removing stained soil after record by the onsite Biological Monitor 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.

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 Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1, MM BIO-7) and APM HYD-09. Fiber rolls and silt fencing were observed being used as perimeter controls at pole replacement sites, along underground alignments, and in staging yards, and rattle plates and rock aprons were observed at the entrances/exits of staging yards and project access roads. CPUC ECMs observed a street sweeper cleaning up construction debris from grinding activities on Buckman Springs Road in accordance with the SWPPP (see Photo 5 – Attachment A). Crews were observed covering soil stockpiles to prevent erosion, and covering staged equipment, materials, and waste containers at staging yards in accordance with the project SWPPP. During grouting and concrete pouring activities, concrete washout containers were used for concrete wash and waste to prevent concrete from being discharged onto the ground in accordance with APM HYD-01 (see Photo 3 – Attachment A).

Traffic control measures were observed being implemented in accordance with APM TRANS-02 along Buckman Springs Road, Highway 76, and Old Highway 80. Signage and cones were used for shoulder closers and flaggers were utilized to temporarily hold traffic when needed.

In accordance with APM VIS-02, construction sites were kept as clean and inconspicuous as possible, and opaque visual 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***

A Level 1 Minor Deviation was recorded during this reporting period.

On February 11, a construction crew misread the installed work limit stakes and cleared vegetation beyond the delineated work limits at Stringing Site 4 on C 449. An environmental monitor onsite observed the mowing outside the work limits and halted work immediately to clarify the staking limits with the onsite Biological Monitor and crew. Approximately 172 square feet of big sagebrush (*Artemisia tridentata*) scrub was impacted outside the work limits. No other sensitive resources were observed to be impacted when an Environmental Inspector, archaeological monitor, and Native American monitor surveyed the area of impact following the incident. The incident violated MM BIO-1, and resulted in a Level 1 Minor Deviation. Identification of approved work limits has been reinforced during the daily tailboards with the foremen and crews.

## **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 March 2019. Approximately 99% complete.

### **TL 629C**

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; tested, capped, and grouted micropiles; assembled and framed poles; installed poles; and conducted overhead work. The estimated completion date is March 2019. Approximately 72% complete.

### **TL 629E**

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

TL 6931

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

TL 682

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs and conducted overhead work. The estimated completion date is May 2019. Approximately 82% complete.

TL 6957

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs and conducted overhead work. The estimated completion date is March 2019. Approximately 90% complete.

TL 6958

During this reporting period, construction crews installed project access and environmentally sensitive area (ESA) signs, cleared vegetation within delineated work limits, and conducted micropile drilling, installation, and grouting. The estimated completion date is June 2019. Approximately 23% complete.

C 157

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs and conducted punch-list items. The estimated completion date is March 2019. Approximately 98% complete.

C 449

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; trenched for undergrounding; installed underground duct banks, conduit, and communication boxes; and cleared vegetation within delineated work limits. The estimated completion date is August 2019. Approximately 13% complete.

## ATTACHMENT A Photos



**Photo 1:** A construction crew was observed conducting sediment and erosion control BMP maintenance at Pole Z40990 (TL 6958) during micropile foundation drilling in accordance with the Erosion Control Plan and SWPPP.



## ATTACHMENT A (Continued)

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**Photo 2:** A construction crew was observed installing a pole base recently delivered via helicopter external load and preparing to receive the pole top at Z40511 (TL 629C).

## ATTACHMENT A (Continued)



**Photo 3:** BMPs were implemented during direct bury foundation pouring at Z40425 (TL 629C) including fiber rolls and concrete waste containment to prevent excess concrete and waste from being discharged onto the ground in accordance with APM HYD-01.



## ATTACHMENT A (Continued)

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**Photo 4:** CPUC ECMs observed redistributed topsoil and a newly installed fiber roll for erosion and sediment control at the completed worksite at Z44201 (TL 629E).

## ATTACHMENT A (Continued)



**Photo 5:** Construction crews were observed trenching and installing conduit along Buckman Springs Road (C 449).



## ATTACHMENT A (Continued)



**Photo 6:** A complete set of fire tools was placed within 50 feet of the observed vegetation clearing and chipping activities at the southern entrance/exit to the Bartlett Staging Yard, in accordance with the CFPPP fire prevention matrix. A Biological Monitor was also observed monitoring the activities in accordance with MM BIO-3.

## 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
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	Interset 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
025	12/11/18	Bartlett Staging Yard	Approved	1/22/19
026	2/22/19	Refinements to TL 629A	Pending	