

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 065 March 24, 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 March 11, 2019 through March 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, TL6958 (formerly TL 629D), 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

Construction activities primarily took place at TL 6958 and C 449, with a lesser amount of construction activities performed at TL 629C and TL 682 during this reporting period. At TL 6958 CPUC ECMs observed construction crews clearing vegetation, installing ground rods and poles (see Attachment A – Photo 1), drilling for micropile foundations (see Attachment A – Photo 3), excavating pole foundations and pouring concrete to set a pole base, and conducting overhead work. Construction crews were also observed stringing and transferring 12 kV wire to new steel poles. At C 449, crews were observed drilling direct-bury pole holes and hand-digging anchor excavations (See Attachment A – Photo 2 & Photo 4), as well as trenching and installing underground conduit and PVC pipe in the underground trench. Rock drills were observed to be used to perforate pole holes and trenching was observed for ground rock installation. At TL 629C, crews were observed conducting punch list items at various locations along the alignment and conducting remove-from-service pole wreckout, including steel pole cutting (see Attachment A – Photo 5). At TL 682, crews were observed removing, cutting, and installing poles, as well as removing a pole butt (see Attachment A – Photo 6).

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.

Approved workspaces were delineated with staking and flagging, and work crews were observed adhering to work space limits in accordance with MM BIO-1 (see Attachment A – Photo 6). 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 at C 449 for vegetation clearing work in accordance with MM BIO-3. Along TL 6958, C 449, TL 629C, and TL 682, sediment and erosion control BMPs were regularly inspected and maintained. Environmentally Sensitive Area (ESA) signage and flagging was in place to prevent impacts to sensitive plant and animal species (see Attachment A – Photo 2), such as special status and/or butterfly host plant populations along rights-of-way in accordance with MM BIO-14 and MM BIO-16. An avian biologist was observed conducting pre-construction nesting bird surveys along C449 prior to vegetation-clearing crews 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. To prevent littering, construction crews used trash bags which were removed from sites daily in accordance with MM BIO-26. The Arroyo Toad (*Anaxyrus californicus*) authorized biologist was observed checking the integrity of the Arroyo toad fencing and spot checking construction activities at various locations along the alignment on C449 in accordance with APM BIO-5. Previously- installed Arroyo Toad exclusionary fencing surrounding the site at Pole Z40980 (TL 6958) was observed to stretch outward along the ground and be secured with a continuous line of gravel bags in accordance with the Arroyo Toad Monitoring and Relocation Plan (see Attachment A – Photo 1).

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 (see Attachment A – Photo 2). 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 (see Attachment A – Photo 2).

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 Attachment A – Photo 2). 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, utilizing drip pans beneath sanitary facilities, using designated hazardous material staging areas (in staging yards) equipped with secondary containment, in which barrels of hazardous waste was properly labeled, and using double-walled tanks for fuel storage. In helicopter landing areas, ground persons staged jet fuel tanks over pop-up spill containment in accordance with the ASP and MM PHS-5.

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 drilling sites (see Attachment A – Photo 4), 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. 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 staged equipment, materials, and waste containers at staging yards in accordance with the project SWPPP. During concrete pouring for pole installation, 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. Dewatering at sites along TL 6958 were observed using dewatering techniques in accordance with APM HYD-08 (see Attachment A – Photo 4).

Traffic control measures were observed being implemented in accordance with APM TRANS-02 (see Attachment A – Photo 5). Signage and cones were used for shoulder closers and flaggers were utilized

to temporarily hold traffic when needed, or when helicopter operations crossed or occurred next to public roadways.

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.

In accordance with MM REC-2, construction personnel were observed following proper gate protocol, and locking gates authorized by the Master Special Use Permit (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-reported three Level 1 Minor Deviations in this reporting period.

On March 12, an existing wood pole at Pole Z100056 dragged on the ground approximately 20 feet outside of the work limits while it was being removed via helicopter. The SDG&E biological monitor, an archaeological monitor, a Native American monitor, and an SDG&E construction adviser were observed present during the incident and surveyed the area of disturbance for cultural and sensitive biological resources; none were impacted. The impacted area was approximately 20 feet long by six inches wide and consisted of disturbed habitat. The incident violated MM BIO-1 and resulted in a Level 1 Minor Deviation.

On March 22, while construction crews were setting Pole Z40980 on TL6958, the helicopter operator placed the pole top outside of the delineated work area. The helicopter refueled at the Rodriguez Staging Yard, returned, and installed the pole top. The SDG&E biological monitor surveyed the area and no ground disturbance was observed or reported. The incident violated MM BIO-1 and resulted in a Level 1 Minor Deviation.

On March 22, trench plating at Station Number 66+65 on C449 was improperly recessed, creating a potential public safety hazard, as identified by construction crews. To correct the issue, Project crews worked until 8:00 p.m., which is beyond the permitted work hours. The work violated MM NOI-4 and resulted in a Level 1 Minor Deviation.

As a follow-up to the non-compliances this reporting period, construction crews were re-trained on proper rigging for helicopter removal poles, and the importance of remaining within delineated work spaces was reiterated at all tailboards.

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 conducted punch-list items, and removed sediment and erosion control best management practices (BMPs). Complete pending final inspection and punch-list items. The estimated completion date is March 2019. Approximately 99% complete.

TL 629C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs. Additionally constructions crews conducted punch-list items and clean-up, overhead work, and the removal of poles and pole butts. The estimated completion date is March 2019. Approximately 95% complete.

TL 629E

During this reporting period, construction crews conducted punch-list items. Completion pending final inspection. 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. Completion pending final inspection. 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. Construction crews removed and installed poles, as well as removed a pole butt. The estimated completion date is May 2019. Approximately 88% 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 May 2019. Approximately 97% complete.

TL 6958

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, conducted micropile drilling, installation, testing, capping, and grouting. Additionally construction crews installed ground rods and poles, excavated pole foundations, and conducted overhead work. The estimated completion date is June 2019. Approximately 40% complete.

C 157

During this reporting period, construction crews removed sediment and erosion control BMPs, and conducted clean-up. The estimated completion date is March 2019. Approximately 99% complete.

C 449

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, trenched for undergrounding, and installed underground duct banks, conduit, and communication boxes. Additionally construction crews excavated direct-bury pole and anchor holes, and installed ground rods and anchors. The estimated completion date is August 2019. Approximately 22% complete.

ATTACHMENT A Photos



Photo 1: A construction crew was observed setting rebar at Pole Z40980 (TL 6958). The lower portion of the Arroyo toad fencing surrounding the site was observed to stretch outward along the ground and be secured with a continuous line of gravel bags in accordance with the Arroyo Toad Monitoring and Relocation Plan.

ATTACHMENT A (Continued)



Photo 2: Project personnel were observed avoiding a clearly marked ESA surrounding the anchor at Pole P258862 (C 449) in accordance with the HPMP and APM CUL-03. In addition, Archaeological and Cultural Monitors were present in accordance with APM CUL-04 and MM CUL-1.

ATTACHMENT A (Continued)



Photo 3: A construction crew observed drilling for a micropile foundation at Pole Z40979 (TL 6958). Ground water encountered while drilling was pumped into tanks and through filter bags before being discharged to land in accordance with APM HYD-08.

ATTACHMENT A (Continued)



Photo 4: To prevent erosion of dirt spoil (from pole hole drilling) into a nearby jurisdictional drainage adjacent to P258855 (C 449), a construction crew removed the dirt spoil and cleaned-up/raked, and removed sediment buildup on fiber rolls in accordance with the ECP, SWPPP, and SAA. Work limits were clearly delineated in accordance with MM BIO-1.

ATTACHMENT A (Continued)



Photo 5: In accordance with APM TRANS-02, traffic was regulated on Buckman Springs Road (TL 629C) while helicopter external load operations were occurring across the road.

ATTACHMENT A (Continued)



Photo 6: A construction crew observed cutting the old pole at Z118069 (TL 682) and loading pieces onto a truck for off-site hauling. The crew was observed working within the approved work space in accordance with MM BIO-1.

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	
027	3/1/19, Revised 3/8/19	Expansion of the Cameron Staging Yard	Approved	3/12/19
028	3/7/19	Underground workspaces at three existing pole locations on C 449	Approved	3/12/19