

	<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: 067</p> <p>April 21, 2019</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 April 8, 2019 through April 21, 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) 6958 (formerly TL 629D), TL 629C, TL 682, Circuits (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 C 449, CPUC ECMs observed construction crews conducting work for the underground portion of the 12kV line including excavating trenches for the distribution line and communication box and pouring concrete to set the conduit and box. Crews were observed conducting hot work hot work along the steel plates covering the trenches (see Photos 1 and 2 – Attachment A).

At TL 6958, construction crews were observed installing poles and setting pole tops, grounding, conducting overhead work (hanging travelers, spreading wire, sagging and dead-ending wire), removing old wooden poles, and performing punch list clean-up work (see Photos 3 and 4 – Attachment A). At TL 682, ECMs observed construction crews conducting 12 kV cutover work, splicing fiber optic line, conducting final site stabilization work, and conducting maintenance and repair of Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) on access roads (see Photo 5 – Attachment A). At TL 629C, construction crews were observed removing erosion control BMPs as part of site closeout punch list activities (see Photo 6 – Attachment A).

To prevent fugitive dust emissions during project activities, construction crews were observed watering along unpaved access roads and various staging and fly yards as needed to prevent fugitive dust in accordance with APM AIR-02.

Approved workspaces were observed delineated with staking and flagging, and work crews were generally observed adhering to work space limits in accordance with MM BIO-1 (See Photos 1 through 4 – Attachment A). Workers were observed having completed the Worker Environmental Awareness Program (WEAP) as shown by project hard hat stickers in accordance with MM BIO-2 and Biological Monitors (BM) were observed at work sites along the right-of-way in accordance with MM BIO-3 and MM BIO-22. ESA signage and flagging was observed in place along the right-of-way to prevent impacts to sensitive plant and animal species, 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 monitoring an active red-tailed hawk nest at TL 6958 and an avian biologist was observed conducting a nesting bird survey on TL 682 in accordance with the APP/NBMP and MM BIO-28 (see Photo 5 – Attachment A).

Cultural resource monitors, including Archaeological and Native American Monitors, were observed monitoring project activities occurring within the vicinity of known cultural resources along C 449 and TL 682 in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (see Photo 1 – Attachment A). ESA fences were observed to be in place to prevent unauthorized access and to prevent construction activities in areas containing known cultural resources per the HPMP.

In accordance with the 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 the rights-of-way. Designated fire patrols were observed

monitoring hot work activities along the right-of-ways and areas surrounding these activities were wetted in accordance with the CFPPP matrices (see Photo 2 – Attachment A).

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 and MM PHS-2. During this reporting period, crews were observed utilizing drip pans beneath staged equipment and stand-alone generators and pumps during construction activities along Buckman Springs Road and hazardous waste drums in the Nursery Staging Yard were observed labeled and stored over secondary containment pallets in accordance with the Spill Response and Notification Plan and MM PHS-2.

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), SWPPP (MM HYD-1, MM BIO-7) and APM HYD-09. Fiber rolls and silt fencing were observed being used as perimeter controls and in good condition in accordance with the ECP and SWPPP (see Photo 2 and 4 – Attachment A). At TL 682, jute netting was observed being installed to stabilize the soil and prevent erosion, while silt fence removal was observed with crews removing and redistributing accumulated sediment. On April 17, the CPUC ECM notified the on-site BM of damaged fiber rolls surrounding a stockpile of cold mix asphalt staged on Buckman Springs Road. The BM confirmed that the contractor would replace the damaged fiber rolls.

Traffic control measures were observed being implemented in accordance with APM TRANS-02 by CPUC ECMs during this reporting period. Traffic flaggers were observed along Cameron Truck Trail to stop traffic when necessary and turn around through traffic during repositioning of power lines in TL 6958. Signage and cones were used when necessary in accordance with the Traffic Control Plan (APM TRANS-05). Additionally, traffic personnel were observed stopping traffic on Highway 76 during close out work along TL 682 in accordance with APM TRANS-02 to eliminate risk of sediment or rocks rolling onto the road.

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 two Level 1 Minor Deviations that occurred in this reporting period.

On April 8, a crew was unable to demobilize from Buckman Springs Road before 2:00 p.m., in violation of the Project's Traffic Control Plan (APM TRANS-05). A partial lane reopening was achieved at 2:10

p.m. On April 9, a crew pouring concrete experienced delays that resulted in a lane closure beyond 2:00 p.m. The crew achieved lane reopening at 2:30 p.m. The requirements for finishing road closure work on time was reiterated at Project tailboard meetings.

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

Completion pending final inspection and punch-list items. The estimated completion date is April 2019. Approximately 99% complete.

TL 629C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, and conducted SWPPP punch-list items and clean-up. The estimated completion date is April 2019. Approximately 97% complete.

TL 629E

Completion pending final inspection and punch-list items. The estimated completion date is April 2019. Approximately 99% complete.

TL 6931

Completion pending final inspection. The estimated completion date is April 2019. Approximately 99% complete.

TL 682

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work, removed poles, conducted access road maintenance, and punch-list work. The estimated completion date is May 2019. Approximately 90% complete.

TL 6957

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, conducted access road work and punch-list items. Completion pending final inspection. The estimated completion date is April 2019. Approximately 99% complete.

TL 6958

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, installed poles, and conducted overhead work. The estimated completion date is June 2019. Approximately 60% complete.

C 157

Completion pending final inspection. The estimated completion date is April 2019. Approximately 99% complete.

C 449

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; trenched for undergrounding; installed underground duct banks, conduit, and communication boxes; paved completed excavations; and excavated direct-bury pole and anchor holes. The estimated completion date is August 2019. Approximately 45% complete.

ATTACHMENT A Photos



Photo 1: A Cultural Monitor was observed monitoring trench excavation along C449 in accordance with the HPMP and APM CUL-04.

ATTACHMENT A (Continued)



Photo 2: Hot work (using a torch to cut welding debris off steel plates) was observed along the trench at C449. A Dedicated Fire Patrol was observed wetting down the surrounding area and staging a complete set of fire tools in accordance with the CFPPP Fire Matrix for the day's fire conditions (PAL C on CNF land).

ATTACHMENT A (Continued)



Photo 3: Construction crews were observed repositioning 69 kV lines on an old pole after spreading wire and installing a new pole at Z40792 (TL 6958). Traffic flaggers were observed along Cameron Truck Trail to stop and redirect traffic when necessary in accordance with APM TRANS-02.

ATTACHMENT A (Continued)



Photo 4: Construction crews were observed conducting overhead work (hanging travelers) at Pole Z40968 (TL 6958) in preparation for wire stringing. SWPPP BMPs (silt fencing) were observed in good condition in accordance with the MM HYD-1.

ATTACHMENT A (Continued)



Photo 5: In accordance with the APP/NBMP (MM BIO-28), an avian biologist on TL 682 was observed conducting a nesting bird survey along Cuca Loop East in preparation for planned erosion repair/maintenance.

ATTACHMENT A (Continued)



Photo 6: Helicopter external load operations were utilized to remove erosion control BMPs at Pole Z40421 (TL 629C). At the Buckman Springs Fly Yard, a water tender was observed applying water to the surface to minimize dust emissions from rotor wash in accordance with APM AIR-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 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
CPUC-020	April 19, 2019	Reconstruction of TL 629A	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
025	12/11/18	Bartlett Staging Yard	Approved	1/22/19
026	2/22/19	Refinements to TL 629A	Approved	4/19/19
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