

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 100 July 26, 2020

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 July 13 through July 26, 2020.

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) 629A, TL 626 Conversion South (Circuit (C) 79B), and C 440, 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 along TL 629A, CPUC ECMs observed crews conducting overhead work. Along TL 626 Conversion South (C 79B), CPUC ECMs observed crews digging direct-bury pole holes and anchor excavations, conducting perforation drilling, removing vegetation, conducting overhead work, covering conductors and removing guy wires, trenching for ground rod installation, covering pole holes and spoils stockpiles, framing and setting poles, and placing rock in pole holes. Along C 440, CPUC ECMs observed crews digging direct-bury pole holes and anchor excavations, installing anchors, removing and chipping vegetation, spotting and framing poles, conducting overhead work, potholing for underground utilities, installing erosion control Best Management Practices (BMPs), setting poles, conducting base paving, excavating trenches, and conducting horizontal drilling.

To prevent fugitive dust emissions during project activities, crews were observed applying water to prevent fugitive dust along unpaved access roads and in work areas in accordance with APM AIR-02 (see Photo 1 – Attachment A). Haul trucks used for dirt export were observed utilizing load covers to prevent dust emissions in accordance with APM AIR-02, and construction personnel were observed maintaining posted speeds of 15 miles per hour on unpaved access roads in accordance with APM AIR-03 and MM BIO-24. Construction crews were observed removing track-out from paved access roads in accordance with APM AIR-05.

Approved workspaces were observed delineated with staking and flagging, and work crews were observed adhering to work space limits and staying on approved access roads 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. Authorized biologists surveyed all work areas for special-status plant and wildlife species prior to the commencement of construction, in accordance with APM BIO-02. Biological monitors were observed conducting full-time monitoring of initial ground-disturbing activities such as vegetation removal in accordance with MM BIO-3 (see Photo 2 – Attachment A), and monitoring all other construction activities to ensure compliance with mitigation measures, applicant proposed measures, and permit conditions in accordance with MM BIO-22. In accordance with MM BIO-14 and MM BIO-16, Environmentally Sensitive Area (ESA) signs and flagging were observed installed around areas with special-status species, and ESAs were observed being avoided by crews. Excavations were observed covered to prevent wildlife entrapment in accordance with MM BIO-23, and crews were observed containing trash at work areas in accordance with MM BIO-26. Avian biologists were observed conducting nesting bird surveys and were present to monitor bird nests during construction activities in accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) and MM BIO-28.

CPUC ECMs observed cultural resource monitors, including archaeological and Native American monitors, monitoring construction activities that occurred within or adjacent to identified archaeological or cultural resource site boundaries in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (see Photo 3 – Attachment A). Cultural ESAs were marked

to prevent construction access to areas with cultural and/or historical resources in accordance with the HPMP, and work crews were observed respecting cultural ESA boundaries.

In accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1), San Diego Gas & Electric (SDG&E) and their construction contractors were observed communicating Fire Potential Index (FPI) and Project Activity Levels (PALs) to work crews at daily tailboard meetings, during which daily fire requirements and restrictions for work on private land and on National Forest System (NFS) land were discussed. All project-related vehicles and equipment were observed carrying the required set of fire tools (each set containing a 5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher). Construction crews were observed staging a set of fire tools within 50 feet of work activities as required by APM HAZ-04 and other tools as required by the CFPPP (see Photo 4 – Attachment A). Fire boxes were observed at staging yards and stocked with the required firefighting tools.

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, construction crews were observed implementing spill prevention BMPs, such as using drip pans under staged equipment and beneath equipment during mechanical work and refueling, staging spill kits at work sites, using double-walled fuel tanks or implementing secondary containment beneath staged fuel tanks, covering containment that may contain hazardous materials during rain events, and cleaning up spills and disposing of contaminated soils in the designated and properly labeled hazardous waste barrels.

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), Stormwater Pollution Prevention Plan (SWPPP; MM HYD-1 and MM BIO-7), and APM HYD-09 (see Photo 5 – Attachment A).

Traffic control measures were observed being implemented in accordance with APM TRANS-01 through APM TRANS-05 during this reporting period (see Photo 6 – Attachment A).

In accordance with APM VIS-02, construction activities were kept as clean and inconspicuous as practical.

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 MMCRP.

Compliance Status

Six Level 1 Minor Deviations occurred during this reporting period.

SDG&E reported that on July 15, a crew worked past the allowable construction hours to restore power to a landowner's property near P40228 on Phase II of C 440. The crew was off the right-of-way by 8:00

p.m. The incident was a violation of MM NOI-4 and resulted in a Level 1 Minor Deviation. Per SDG&E, crews were reminded at the tailboard meeting to adhere to the allowable construction hours.

SDG&E reported that on July 16, it was discovered that two fire watch crew members working on Phase II of C 440 had not attended the required WEAP training. The incident was a violation of MM BIO-2 and resulted in a Level 1 Minor Deviation. The crew members were asked to leave the right-of-way, and construction was stopped until WEAP-trained fire crews arrived. Per SDG&E, the importance of the environmental awareness education was stressed to the crews at the tailboard meeting.

SDG&E reported that on July 18, trucks working on Phase II of C 440 drove along Morris Ranch Road, creating 20-foot-tall dust plumes. The incident was a violation of APM AIR-02 and resulted in a Level 1 Minor Deviation. After the plumes were noticed, a water truck was dispatched to water the access road in order to reduce dust. Per SDG&E, crews were reminded at the tailboard meeting to adhere to dust-control measures.

SDG&E reported that on July 20, crews staged a drill outside of the work area during excavation work at P258484 on TL 626 Conversion South. The drill had traveled approximately 12 feet across vegetation between the pole and anchor workspaces. Access between these two workspaces is supposed to be via footpath. The impacted area measured approximately 12 feet long with a width of between 10 and 20 feet. Dominant plant species included Cryptantha and non-native grasses. No impacts to cultural resources were identified. The incident was a violation of MM BIO-1 and resulted in a Level 1 Minor Deviation. Per SDG&E, crews were reminded at the tailboard meeting to adhere to workspace limits.

SDG&E reported that on July 20, spoils were observed that extended past the approved work limits at P258484 on TL 626 Conversion South. The impacted area measured approximately 15 feet long and 2 feet wide. Dominant plant species included scrub oak (*Quercus berberidifolia*) and non-native grasses. The incident was a violation of MM BIO-1 and resulted in a Level 1 Minor Deviation. Per SDG&E, crews were reminded at the tailboard meeting to adhere to workspace limits.

SDG&E reported that on July 20, a crew began working prior to the allowable construction hours on TL 629A without prior authorization. The incident was a violation of MM NOI-4 and resulted in a Level 1 Minor Deviation. Per SDG&E, crews were reminded at the tailboard meeting to adhere to the allowable construction hours.

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 682, TL 6957, TL 629C, and TL 6958

Completion pending final inspection and punch-list items. Approximately 99% complete.

TL 625C

During this reporting period, construction crews maintained access roads, removed poles, sagged wires, and completed SWPPP punch-list close-out work. Approximately 99% complete.

TL 629A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, installed travelers; spread, clipped, and pulled wire; conducted overhead operations and wire-stringing operations; assembled and installed poles; and poured concrete. The estimated completion date is August 2020. Approximately 90% complete.

TL 6923

During this reporting period, construction crews conducted punch-list close-out work; removed anchors, poles, and BMPs; and conducted overhead operations. The estimated completion date is August 2020. Approximately 99% complete.

TL 626 Conversion North (C 222)

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; assembled, installed, and removed poles; conducted backfill and compaction operations; and conducted overhead and wire-stringing operations. The estimated completion date is August 2020. Approximately 89% complete.

TL 626 RFS

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; topped and removed poles; conducted backfill operations; and conducted overhead operations. The estimated completion date is December 2020. Approximately 30% complete.

TL 626 Conversion South (C 79B)

During this reporting period, construction crews installed sediment and erosion control BMPs; removed vegetation and spoils; drilled for, excavated for, and perforated pole foundations; excavated for, assembled, installed, and removed poles; excavated for, installed, and relocated anchors; installed grounding rods and switches; conducted overhead and wire-stringing operations; maintained access roads; and conducted backfill operations. The estimated completion date is December 2020. Approximately 26% complete.

C 440 Phase I

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, removed vegetation; excavated for, assembled, removed and installed poles; poured concrete; installed jumper switches; conducted overhead work and wire-stringing operations; conducted backfill operations; and graded. The estimated completion date is August 2020. Approximately 98% complete.

C 440 Phase II

During this reporting period, construction crews installed sediment and erosion control BMPs; installed signage; removed and chipped vegetation; marked, trimmed, and removed trees; drilled and perforated pole foundations; drilled and excavated for, assembled, installed, and removed poles; drilled and excavated for, installed, and tested anchors; installed grounding rods and vaults; conducted overhead operations and wire-stringing operations; potholed; saw-cut asphalt; drilled and excavated for, and installed conduit; conducted backfill operations; paved; and poured concrete. The estimated completion date is December 2020. Approximately 9% complete.

C 79A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; paved; and conducted compaction operations. The estimated completion date is July 2020. Approximately 99% complete.

ATTACHMENT A Photos



Photo 1: A water tender was observed applying water on Los Huecos Road (C 440 Phase II) to minimize dust emissions throughout the day in accordance with APM AIR-02.

ATTACHMENT A (Continued)



Photo 2: A Biological Monitor was observed monitoring vegetation removal at the anchor site at P874922 (C 79B) in accordance with MM BIO-3.

ATTACHMENT A (Continued)



Photo 3: A crew was observed excavating a trench on Sunrise Highway along C 440 Phase II. Archaeological and Cultural Monitors were observed monitoring the activity, and an adjacent Cultural ESA was clearly delineated and avoided by crews in accordance with the HPMP (MM CUL-1), APM CUL-03, APM CUL-04, and MM CUL-1.

ATTACHMENT A (Continued)



Photo 4: A crew was observed drilling a direct bury pole hole at P258505 (C 79B). A Dedicated Fire Patrol, at least 150 gallons of water with pump and hose, and a full set of fire tools were observed on site in accordance with the CFPPP Fire Prevention Matrix (MM FF-1) for foundation drilling on USFS land with a PAL Ev.

ATTACHMENT A (Continued)



Photo 5: A crew was observed digging a direct bury pole hole at P45115 (C 440 Phase II). Erosion control BMPs at the site were observed in good condition in accordance with the ECP (MM HYD-1) and SWPPP (MM HYD-1, MM BIO-7).

ATTACHMENT A (Continued)



Photo 6: Signage, cones, flagpersons, and a clearly marked pilot vehicle were used to direct one-way traffic around the work area on Old Highway 80 (TL 629A) in accordance with the Traffic Control Plan (TCP; APM TRANS-05) and 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 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
CPUC-021	May 29, 2019	Reconstruction of C79A	Y
CPUC-022	June 18, 2019	Reconstruction of TL 625C	Y
CPUC-023	July 11, 2019	Reconstruction/Removal of C440 Phase I Overhead	Y
CPUC-024	November 22, 2019	Reconstruction of TL 6923	Y
CPUC-025	February 4, 2020	Remove TL 626 from service and convert the northern section of TL 626 from 69 kV to 12 kV	Y
CPUC-026	April 23, 2020	Convert the southern portion of TL 626 from a 69 kV transmission line to 12 kV distribution line from Johnson Creek (Pole P258599) to the Descanso Substation	Y
CPUC-027	June 5, 2020	Reconstruct Phase II of the C 440 Component	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

ATTACHMENT C

Minor Project Refinement Request

029	3/28/19	Refinements to C79A	Approved	5/29/19
030	3/29/19	Modify Route to Pole P45476 (C449)	Approved	4/05/19
031	4/26/19	Refinements to TL 625C	Approved	6/18/19
032	5/6/19	Refinements to C 440 Phase I Overhead	Approved	7/11/19
033	5/17/19	Convert Staging areas 2 and 2A from staging to staging and fly yards (C440)	Approved	6/04/19
034	5/17/19	Replace Stevens Ranch Staging Yard Relocation	Approved	5/29/19
035	6/06/19	Refinements to TL 629A Components	Approved	6/18/19
036	6/28/19	Addition of Paso Picacho Staging Yard	Approved	7/17/19
037	6/28/19	Expansion of the Merrigan Staging Yard	Approved	7/03/19
038	7/26/19	Refinements to TL 629A	Approved	8/14/19
039	9/5/19	Refinements to TL 625C	Approved	9/19/19
040	9/12/19	Addition of Underground Alignment to C440	Approved	10/10/19
041	10/2/19	Refinements to TL 6923	Approved	11/22/19
042	10/29/19	Addition of temporary access/entry/turnaround areas, temporary pole work areas, and footpaths at Poles Z774861, Z774862, Z774863, and Z774864	Approved	12/9/19
043	12/27/19	Replacement pole location adjustment and addition of temporary workspace at Pole Z272939	Approved	1/9/20
044	2/10/20	Refinements to TL 626 Conversion South	Approved	4/23/20
045	2/21/20	Temporary shoo-fly along TL629A	Approved	3/9/20
046	3/6/20	Additional anchor locations and access road modifications along C 440 Phase I.	Approved	3/26/20
047	4/9/20	Modify components of TL 626 Conversion North /TL 626 RFS	Approved	4/22/20