

California Public Utilities Commission Mitigation Monitoring, Compliance, and Reporting Program

Cleveland National Forest Power Line Replacement Projects

Compliance Status Report: 072

June 30, 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 June 17, 2019 through June 30, 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) 629A, TL 6957, Circuit (C) 449, C 440 Phase I, 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 construction crews clearing vegetation, installing Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs), drilling direct bury pole holes, conducting micropile drilling, and conducting overhead work (see Photos 1 through 3 – Attachment A). Along C 449, construction crews were observed removing old poles and removing pole tops via helicopter, and installing transformers, which involved cleaning conduit and preparing concrete backfill (see Photo 4 – Attachment A). Along C 440, ECMs observed construction crews preparing designated workspaces for vault installation, including vegetation removal and BMP installation, and conducting vault work including excavation, saw cutting, grinding pavement, and pouring slurry (see Photo 5 – Attachment A). Along TL 6957, ECMs observed a construction crew close out a workspace by removing construction-related staking and erosion control BMPs and maintaining a water bar and energy dissipater along an access road.

To prevent fugitive dust emissions during project activities, construction crews were observed watering down staging areas, unpaved access roads, and active construction areas in accordance with APM AIR-02. Access roads were observed signed and posted with approved project speed limits in accordance with APM AIR-03 and MM BIO-24. Containment boxes were observed being utilized during micropile drilling to contain drill cuttings and minimize dust emissions 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 (see Photo 1 – 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 were observed conducting full-time monitoring of initial ground-disturbing activities such as vegetation clearing and SWPPP BMP installation along TL 629A in accordance with MM BIO-3. Salvaged topsoil was observed stockpiled along the edge of the work areas and secured with erosion and sediment controls (such as natural fiber covering and fiber rolls per the SWPPP) in order to minimize sediment transport and to ensure topsoil was preserved for future restoration efforts in accordance with the Habitat Restoration Plan (MM BIO-4). To prevent wildlife entrapment, trenches and excavations along C440 and TL 629A were observed to be securely covered by steel plates or backfilled in accordance with MM BIO-23. On one occasion during this reporting period, an ECM observed loose trash located adjacent to a dumpster at the Merrigan Staging Yard and notified the on-site biological monitor. The biological monitor informed project personnel and later that day the trash was observed cleaned up and secured in a project dumpster in accordance with MM BIO-26. ECMs observed construction crews avoiding Environmentally Sensitive Areas (ESA) flagged for active nests along TL 629A in accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) and MM BIO-28 (see Photo 2 – Attachment A).

CPUC ECMs observed cultural resource monitors, including Archaeological and Native American Monitors, monitoring construction activities that occured 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, including vault installations within C 440, direct-bury pole installations, and vegetation removal along C440 and TL 629A (see Photo 5 – Attachment A). Cultural resource ESAs were observed marked with signage stating an archaeological monitor was required to be present in accordance with the HPMP and MM CUL-1.

In accordance with the Construction Fire Protection/Prevention Plan (CFPPP) (MM FF-1), all projectrelated 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) and these tools were observed within 50 feet of work activities (see Photo 1 -Attachment A). ECMs observed asphalt grinding activities taking place with the area wetted down and 100 gallons of water (with pump and hose) on site in preparation for vault excavation and steel plate cover installation on Sunrise Highway (C 440) in accordance with the CFPPP (see Photo 5 - 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 (SRNP) and MM PHS-2. Drip pans and secondary catchments were observed under fuel cans, heavy equipment and generators along project segments and staging and fly yards (see Photo 6 – Attachment A).

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-01, MM BIO-7) and APM HYD-09. During micropile cap installation in TL 629A, dried concrete rubble left from foundation grouting operations was cleaned up for off-site disposal in accordance with the SWPPP and APM HYD-01. Silt fencing were observed being installed as perimeter controls at project sites along TL 629A in accordance with the ECP and SWPPP (see Photo 1 – Attachment A). Groundwater encountered during vault installations on C 449 was observed discharged to land through a filter sock in accordance with APM HYD-08.

During this reporting period, micropile drilling took place in proximity to a small local business in TL 629A. Although the noise levels were reported below the 8-hour L_{eq} of 75 dBA threshold, ECMs observed a construction crew utilize a portable noise barriers to minimize noise impact in accordance with MM NOI-1 (see Photo 3 – Attachment A).

Traffic control measures were observed being implemented in accordance with APM TRANS-02 during this reporting period. Traffic flaggers were observed directing one-way traffic around a work zone on TL 629A while construction crews mobilized micropile drilling equipment (see Photo 2 – Attachment A). Additionally, on several occasions ECMs observed the use of cones and traffic flagging on River Drive and Old Highway 80 during micropile drilling activities in accordance with the Traffic Control Plan (TCP) and APM TRANS-05.

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

No compliance issues were noted during this reporting period.

CONSTRUCTION SCHEDULE AND PROGRESS

San Diego Gas & Electric (SDG&E) began construction activities associated with NTP-1 on September 23, 2016. All project activities are scheduled to be complete by 2020.

<u>TL 625B</u>

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

<u>TL 629A</u>

During this reporting period, construction crews installed sediment and erosion control BMPs, removed vegetation and trimmed trees within delineated work areas, drilled for, grouted, and tested micropile foundations, excavated for direct-bury pole installations, installed anchors, grounding rods, and poles, and conducted overhead work. The estimated completion date is July 2020. Approximately 9% complete.

<u>TL 629C</u>

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 July 2019. Approximately 99% complete.

<u>TL 629E</u>

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

<u>TL 6931</u>

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

<u>TL 682</u>

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

<u>TL 6957</u>

During this reporting period, construction crews conducted SWPPP punch-list work and clean-up. The estimated completion date is July 2019. Approximately 99% complete.

<u>TL 6958</u>

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs. The estimated completion date is July 2019. Approximately 93% complete.

<u>C 157</u>

During this reporting period, construction crews conducted punch-list work. Completion pending final inspection. The estimated completion date is July 2019. Approximately 99% complete.

<u>C 449</u>

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, as well as cleaned conduit. Additionally, crews conducted paving, overhead work, and pulled underground cables. The estimated completion date is August 2019. Approximately 85% complete.

<u>C 440 Phase I</u>

During this reporting period, construction crews installed sediment and erosion control BMPs, trimmed trees, saw-cut pavement and excavated for underground work, and installed vaults. The estimated completion date is May 2020. Approximately 2% complete.

ATTACHMENT A Photos



Photo 1: A crew was observed clearing vegetation within the approved workspace at Z173101 (TL 629A) in accordance with MM BIO-1. A biological monitor was present on site in accordance with MM BIO-03, and a set of fire tools was placed within 50 feet of activities in accordance with the CFPPP fire prevention matrix (off CNF land - FPI Normal).



Photo 2: During construction crew mobilization for micropile drilling at Pole Z173150 (TL 629A), a signed nesting bird buffer was observed along the western side of Corte Madera Road, and the construction crew was observed avoiding the area in accordance with the APP/NBMP and MM BIO-28. A traffic flagger conducted a lane closure and directed one-way traffic around the work zone in accordance with the TCP (APM TRANS-05).



Photo 3: Noise barriers were observed being implemented at Z173060 (TL 629A) during micropile drilling activities to reduce noise in accordance with MM NOI-1.



Photo 4: Crews were observed cutting off old wooden poles above communications lines and removing pole tops via helicopter external loads along C 449 (P45925, above).



Photo 5: During asphalt grinding at Station 422+74 (C 440) in preparation for vault excavation and steel plate installation, water was applied at the recommendation of the SDG&E fire coordinator for fire risk mitigation in accordance with the fire prevention matrix in the CFPPP. Cultural resource monitors were present on-site for upcoming vault excavation work in accordance with the HPMP, MM CUL-1, and APM CUL-04.



Photo 6: Containment placed under the generator and fuel tank at the Merrigan Staging Yard (TL 629A) in accordance with the SRNP and MM PHS-2.

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	
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	

ATTACHMENT C Minor Project Refinement Request

Minor Project Refinement Request No.	Submitted	Description	Status	Approval
001	10/5/16,	Request for Modifications to the Anderson, Merrigan and Japatul Spur	Approved	10/21/16
	Revised 10/18/16	Staging Yards		
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	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
033	5/17/19	Convert Staging areas 2 and 2A from staging to staging and fly yards (C440)	Approved	6/04/19