

	<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: 074</p> <p>July 28, 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 July 15, 2019 through July 28, 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 625C, Circuit (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 construction crews conducting vegetation removal, drilling anchor holes, potholing, and backfilling pole bases with concrete. Near the Descanso substation (TL 629A), construction crews were observed performing overhead work, which included installing and removing wire protectors, stringing wire, and installing pole arms (see Photo 1 – Attachment A). Construction crews were observed conducting helicopter external load operations at Creekside Staging and Fly Yard to support brushing and BMP installation. Additionally, ECMs observed crews drilling pole foundation holes, installing grounds at several pole locations, conducting micropile foundation drilling, and installing Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) (see Photo 2 – Attachment A). Along TL 625C, ECMs observed construction crews installing BMPs and removing vegetation by tree trimming (see Photo 3 – Attachment A). Additionally, crews were observed setting up drilling equipment at various pole locations. Along C 440, CPUC ECMs observed construction crews saw cutting to prepare for locating underground utilities (potholing), tree trimming at Wooded Hill Road, and conducting vault work, which included pouring concrete, bringing excavations to depth, setting vaults, and placing rock in vault excavations (see Photo 4 – Attachment A).

To prevent fugitive dust emissions during project activities, construction crews were observed applying water to prevent or mitigate fugitive dust at staging areas, unpaved access roads, and active construction areas in accordance with APM AIR-02. ECMs observed water trucks in use for compaction and dust control at the Merrigan Staging Yard (TL 629A). Construction personnel were observed maintaining posted speeds of 15 miles per hour on unpaved roads in accordance with APM AIR-03 and MM BIO-24. Along TL 625C, an ECM observed a containment box in use to trap drill cuttings during micro pile drilling to 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. 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 conducting full-time monitoring of initial ground-disturbing activities such as vegetation removal along TL 629A and TL 625C in accordance with MM BIO-3 (see Photo 3 – Attachment A). The pole holes were observed by ECMs to be covered to prevent wildlife entrapment in accordance with MM BIO-23. During this reporting period, an ECM observed loose trash located adjacent to portable restrooms at the Merrigan Staging Yard (TL 629A) and notified the lead biological monitor. The biological monitor informed project personnel and later that day confirmed the trash would be removed in accordance with MM BIO-26. ECMs observed pre-construction sweeps and monitoring in the eastern portion of TL 629A in accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) and MM BIO-28. ESA signage and flagging for an active nest was observed by an ECM along TL 629A.

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, including vault installations along C 440 (see Photo 4 – Attachment A). On July 25th, SDG&E implemented three stop-work orders on pole locations in order to conduct further investigations in accordance with the HPMP. Crews were observed flagging the area to preclude all work.

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) and these tools were observed within 50 feet of work activities. ECMs observed activities occurring along project segments as allowed by CFPPP and fire prevention practices implemented during construction as required by the CFPPP (see Photos 2, 4 and 6 – 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 (see Photo 5 – Attachment A). During this reporting period, secondary containment was observed on a number of occasions by ECMs beneath fuel canisters on TL 629A during vegetation removal activities.

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. Work areas along TL 629A were observed to have secured erosion and sediment controls (such as natural fiber covering and fiber rolls per the SWPPP) in order to minimize sediment transport and slow the flow of potential runoff in accordance with the ECP and SWPPP (see Photo 2 – 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 on several occasions during this reporting period. Along TL 629A, traffic flaggers were observed re-directing traffic to avoid construction activities along Viejas Blvd, River Drive, Corte Madera Road, Old Highway 80, and Highway 79. ECMs observed the use of cones and traffic flagging on Boulder Creek Road and Oak Grove Drive (TL 629A) to facilitate overhead work. These activities were performed in accordance with the Traffic Control Plan (TCP) (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 non-compliances occurred 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.

TL 625B

Completion pending final inspection. Removal of one wooden pole occurred. The estimated completion date is August 2019. Approximately 99% complete.

TL 629A

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; removed vegetation within delineated work areas; drilled for, grouted, and tested micropile foundations; excavated for direct-bury pole installations and conventional foundations; and installed grounding rods and poles. The estimated completion date is July 2020. Approximately 13% complete.

TL 629C

Completion pending final inspection and punch-list items. Inspected and maintained sediment and erosion control best management practices (BMPs). The estimated completion date is August 2019. Approximately 99% complete.

TL 629E

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

TL 6931

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

TL 682

During this reporting period, construction crews conducted tree trimming, punch-list items, applied hydromulch, removed BMPs, and conducted site clean-up. The estimated completion date is August 2019. Approximately 99% complete.

TL 6957

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

TL 6958

Completion pending final inspection and punch-list items. Inspected and maintained sediment and erosion control BMPs. The estimated completion date is August 2019. Approximately 99% complete.

C 157

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

C 449

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs. Additionally, crews wrecked out a former overhead circuit, and tested and completed the installation of underground cables. The estimated completion date is August 2019. Approximately 97% complete.

C 440 Phase I

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, and potholed. Additionally, crew removed vegetation and trimmed trees within delineated work areas, and excavated for and installed underground vaults.. The estimated completion date is May 2020. Approximately 34% complete.

ATTACHMENT A Photos



Photo 1: A construction crew was observed removing 12 kV wire protectors used during pole setting, and backfilling around the pole base with concrete on TL 629A. A crew member was conducting traffic control along Viejas Boulevard during the activities in accordance with the TCP (APM TRANS-05).

ATTACHMENT A (Continued)



Photo 2: A construction worker observed installing perimeter fiber rolls at Pole Z173110 (TL 629A) for erosion control in accordance with the ECP and SWPPP (MM HYD-01, MM BIO-7).

ATTACHMENT A (Continued)



Photo 3: A crew member at Pole P275795 (TL 625C) was observed holding a tree pruner at a work limits stake to increase the visibility of the stake to the crew member in the tree, ensuring that tree trimming remained within approved work limits in accordance with MM BIO-1. Biological monitors were present to oversee the vegetation removal activity in accordance with MM BIO-3.

ATTACHMENT A (Continued)



Photo 4: A biological, archaeological, and cultural monitor were present during vault excavation (C 440) in accordance with MM BIO-22, MM CUL-1, and APM CUL-04. A complete set of fire tools were staged on site (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) in accordance with the CFPPP (MM FF-1).

ATTACHMENT A (Continued)



Photo 5: During vegetation removal activities along TL 629A, a drip pan was observed in use during chain saw fueling to prevent the release of hazardous materials onto the ground in accordance with MM PHS-2. The fueling took place first thing in the morning while the chain saw was still cool in accordance with the CFPPP (MM FF-1).

ATTACHMENT A (Continued)



Photo 6: In preparation for vegetation at Pole Z272905 (TL 625C) to be chipped upon removal, the area was wet down prior to the activity in accordance with the CFPPP for the day's fire conditions (Elevated FPI off CNF land). A Fire Patrol was also present with at least 100 gallons of water and a complete set of fire tools on site.

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
CPUC-023	July 11, 2019	Reconstruction/Removal of C440 Phase I Overhead	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	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