

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 075 August 11, 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 July 29, 2019 through August 11, 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, TL 6957, 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 removing and chipping vegetation and trimming trees, installing Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs), drilling direct bury foundation holes, dewatering, setting pole bases, pouring concrete, trenching for ground rod installation, framing pole tops, removing old wooden pole tops, installing crossarms and spreading and relocating overhead wire, and conducting helicopter operations out of the Creekside Staging and Fly Yard. Along TL 625C, ECMs observed construction crews installing erosion control BMPs, removing and chipping vegetation at work sites and tree trimming along access roads, setting up drilling equipment, hand digging direct bury poles, drilling micropile foundations, and wire stringing. At the Bookout Staging Yard, crews were observed ripping and compacting soil, installing fence posts, and setting up chain link fence. Along TL 6957, crews were observed conducting road maintenance on Carveacre Road near Fog Ridge Road. Along C 440, CPUC ECMs observed construction crews sawcutting to prepare for trenching, installing PVC pipe in trenches behind excavators, pouring concrete, excavating vaults, replacing steel plates after setting vaults, conducting hot work (welding), and grinding the recess for steel plate placement along Sunrise Highway.

To prevent fugitive dust emissions during project activities, construction crews were observed applying water to prevent or mitigate fugitive dust at staging areas prior to helicopter use (see Photo 1 – Attachment A), unpaved access roads, and active construction areas in accordance with APM AIR-02. Trucks that exported dirt spoil off were observed utilizing a load cover to prevent dust in accordance with APM AIR-02 (see Photo 2 – Attachment A). 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.

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 and 4 – Attachment A). In accordance with MM BIO-14 and MM BIO-16, Environmentally Sensitive Area (ESA) signs and flagging were observed around areas with special-status species and observed being avoided. Excavation areas were observed by ECMs to be covered to prevent wildlife entrapment in accordance with MM BIO-23. Crews were observed containing trash at work areas in accordance with MM BIO-26. ECMs observed pre-construction sweeps and monitoring in accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) and MM BIO-28. One Level 1 minor deviation of MM BIO-1 was observed this reporting period (see Compliance Section).

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 Photos 3 and 4 – Attachment A). ESAs flagging sensitive work areas were observed in place in accordance with 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) and were observed within 50 feet of work activities. Fire boxes were observed at staging yards and to ensure 5-gallon backpack pumps were full at all times, fire patrols were observed setting up a “fire tool filling station” after the morning tailboards at the staging yards before project personnel entered the right of ways. ECMs observed activities occurring along project segments as allowed by CFPPP and fire prevention practices implemented during construction as required by the CFPPP (see Photo 5 – Attachment A). One Level 2 non-compliance was observed this reporting period (see Compliance Section).

To prevent leaks and spills from being discharged into the soil, construction crews were observed implementing spill prevention BMPs, such as using secondary catchment and drip pans under parked equipment and using visqueen under concrete hoppers during use (TL 629A), in accordance with the Spill Response and Notification Plan (SRNP) 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) and SWPPP (MM HYD-01, MM BIO-7) and APM HYD-09 (see Photo 4 and Photo 6—Attachment A). Gravel bag dams were observed in good condition and work areas 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. Crews were observed sweeping dirt track-out on paved roadways at the end of work days.

Traffic control measures were observed being implemented in accordance with APM TRANS-01 through APM TRANS-05 during this reporting period. Along TL 629A, ECMs observed cones and flagging stages and traffic flaggers re-directing traffic to avoid construction activities (drilling and overhead work) along Viejas Blvd (see Photo 6 – Attachment A) and were observed halting traffic during helicopter transport of equipment over Old Highway 80. At C440, a clearly marked pilot vehicle was used to shuttle traffic through Sunrise Highway where one lane was closed for trenching activities.

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

Three Level 1 Minor Deviations were reported this reporting period:

On July 29, the CPUC ECM observed silt fencing overrun with groundwater at Pole Z172800 on TL629A and a series of trenches approximately six inches deep that were dug outside the work limits (in bare ground) in attempt to diver the water, which was a deviation of MM BIO-1. SDG&E reported that no sensitive resources were impacted and that the importance of working within the delineated work limits was reiterated during the tailboard meetings.

SDG&E reported that on August 6, work occurred on Phase I of C440 beyond the permitted work hours due to lightning and opening too much trench, which required extra time to cover all open excavations. Crews exited the right-of-way at 9:00 p.m. Working beyond the permitted work hours was a deviation of MM NOI-4. SDG&E reported that the importance of proper planning for opening and plating trench was reiterated during the tailboard meetings.

SDG&E reported that on August 7, two project vehicles on Phase I of C440 drove off of Sheephead Mountain Road and through non-native grassland to avoid other vehicles parked in the road. SDG&E reported that no sensitive resources were impacted. Driving beyond the approved work limits and access road deviated from MM BIO-1. SDG&E reported that the importance of working within the delineated work limits was reiterated during the tailboard meetings.

One Level 2 Minor Deviation was reported this reporting period:

On August 9, the CPUC ECM observed a crew at Pole Z40406 on TL629A that removed and chipped vegetation and installed BMPs in a Fire Danger Rating Area with a Project Activity Level (PAL) of EV. Per the CFPPP, chipping is prohibited on NFS land during EV PAL. Upon identification of the violation, the entire site was wet down and fire patrol performed a one-hour fire watch. SDG&E reported that corrective actions included a safety stand down, discussing Fire Danger Rating Areas where crews will be working at tailboard meetings, revisiting communication procedures in the field, distributing hard copies of the CFPPP to all crew leads, adjusting the review protocols for the plan of the day, and installing signs listing the Fire Danger Rating Areas in the field.

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. 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

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

TL 6957

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

TL 629C

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

TL 6958

Completion pending final inspection and punch-list items. 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, tested, and capped micropile foundations; excavated for direct-bury pole installations and conventional foundations; installed grounding rods and poles, and; conducted overhead work. The estimated completion date is July 2020. Approximately 17% complete.

TL625C

During this reporting period, construction crews staked workspaces and installed ESA signs, installed sediment and erosion control BMPs, removed vegetation and trimmed trees within delineated work areas, drilled for and tested micropile foundations, perforated pole holes, excavated for direct bury holes, developed the Wildwood Glen Fly Yard and the Bookout Staging and Fly Yard, The estimated completion date is August 2020. Approximately 6% 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 and wrecked out former overhead circuit. The estimated completion date is August 2019. Approximately 98% complete.

C 440 Phase I

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, potholed, removed vegetation, excavated for and installed underground vaults, trenched and installed conduit, and saw cut for trenching. 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 35% complete.

C79A

During this reporting period, construction of the Paso Picacho Staging Yard occurred. The estimated completion date is April 2020. Approximately 0% complete.

ATTACHMENT A Photos



Photo 1: Helicopter activities supporting Geo Pacific brushing work at Z173122 (TL 629A) was observed being conducted out of Creekside Staging and Fly Yard. A water truck watered the designated and delineated helicopter landing area to prevent dust emissions in accordance with the Aviation Safety Plan (MM PHS-5) and APM AIR-02.

ATTACHMENT A (Continued)



Photo 2: A crew was observed drilling a pole foundation hole at Z163042 (TL 629A), and exporting dirt spoil off-site. The haul truck exporting dirt spoil utilized a load cover to prevent dust in accordance with APM AIR-02.

ATTACHMENT A (Continued)



Photo 3: Biological, Archaeological, and Cultural Monitors were observed monitoring initial ground-disturbing activities (vegetation removal) along TL 625C in accordance with MM BIO-3, APM CUL-04, and MM CUL-1.

ATTACHMENT A (Continued)



Photo 4: Archaeological and Cultural Monitors were observed monitoring ground rod trenching along TL 629A in accordance with the HPMP, APM CUL-04, and MM CUL-1. Cultural ESA fencing was observed to be in tact in accordance with APM CUL-03. SWPPP BMPs were in place in accordance with MM HYD-1 and MM BIO-7.

ATTACHMENT A (Continued)



Photo 5: A dedicated fire patrol was observed wetting down the area near 439+50 (C 440) prior to hot work (welding), and a complete set of fire tools was observed within 50 feet of the activity in accordance with the CFPPP for the day's fire conditions (PAL C on CNF land).

ATTACHMENT A (Continued)



Photo 6: A crew was observed directing traffic along Viejas Boulevard while setting a pole top at Z373147 (TL 629A) in accordance with the TCP (APM TRANS-05).

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

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