

	<b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting</i></b> <b><i>Program</i></b>
	<b>Cleveland National Forest Power Line Replacement</b> <b>Projects</b>  <b>Compliance Status Report: 077</b>  <b>September 8, 2019</b>

## 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 August 26 through September 8, 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 removing and chipping vegetation, installing and maintaining Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs), drilling pole holes and setting new poles, excavating trenches for grounding wire and rods, potholing to test for underground utilities, and conducting overhead work such as hanging travelers and preparing for wire stringing. Helicopter operations out of the Creekside Staging and Fly Yard were observed transporting materials to support drilling operations along the alignment. Along TL 625C, CPUC ECMs observed construction crews removing and chipping vegetation at work sites, setting up for and drilling micropile foundations, drilling pole holes and installing poles, and installing anchors. Along C 440, CPUC ECMs observed construction crews saw-cutting, excavating trenches for underground distribution line (including jackhammering to break up rock), installing PVC pipe and conduit in trenches, backfilling with concrete, and covering trenches with steel plates and welding.

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, 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. 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 (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. Biological monitors were observed conducting full-time monitoring of initial ground-disturbing activities such as vegetation removal in accordance with MM BIO-3. 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 and nesting bird buffers were observed being posted and avoided by crews.

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 2 – 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 3 – Attachment A).

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, 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. Hydrological resources were observed flagged for avoidance during construction in accordance with APM HYD-06 (See Photo 4 – Attachment A). 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 (See Photos 2, 3, and 6 – Attachment A). Street sweeper machines were observed being used to clean roads after asphalt work along C 440 and crews were observed sweeping dirt track-out on paved roadways at the end of work days in accordance with the SWPPP (See Photo 5 – Attachment A). Concrete washout bins in staging areas were observed being covered prior to rain events in accordance with the SWPPP (See Photo 6 – Attachment A).

Traffic control measures were observed being implemented in accordance with APM TRANS-01 through APM TRANS-05 during this reporting period. Along C440, a clearly marked pilot vehicle was used to safely shuttle traffic along Sunrise Highway in accordance with the Traffic Control Plan (TCP) (APM TRANS-05). Traffic control crews were observed directing one way traffic along the Japatul Valley Road during activities along TL 625C and during wire spreading along TL 629A, traffic control crews set up cones along Old Highway 80 to direct traffic around staged equipment in accordance with the TCP.

### ***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 were observed or reported 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 629E and TL 6931

Complete.

### TL 682, TL 629C, TL 6958, C449

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

### TL 6957

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

### TL 629A

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; removed vegetation and trimmed trees within delineated work areas; removed spoils; drilled for, grouted, and tested micropile foundations; excavated trenches for and installed grounding rods; drilled direct-bury holes; drilled to perforate pole holes; poured concrete for pole foundations; installed grounding rods and poles; conducted overhead work; and conducted backfill operations. The estimated completion date is July 2020. Approximately 24% complete.

### TL625C

During this reporting period, construction crews installed sediment and erosion control BMPs; removed vegetation and trimmed trees within delineated work areas; drilled for, grouted, tested, and capped micropile foundations; perforated pole holes; excavated for direct bury poles and anchor holes; installed direct-bury poles; poured concrete; conducted backfill operations; installed step bolts; and imported, spread and compacted gravel for the Bookout Staging and Fly Yard. The estimated completion date is August 2020. Approximately 14% complete.

### C 157

Completion pending final inspection and punch-list items; conducted tree-trimming. The estimated completion date is September 2019. Approximately 99% complete.

### C 440 Phase I

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, saw-cut, excavated for, and installed conduit, poured slurry into conduit packages, paved trenches, conducted potholing operations, and installed vault lids. The estimated completion date is May 2020. Approximately 38% complete.

#### C79A

During this reporting period, vegetation and tree trimming and installation of a drop tank occurred. The estimated completion date is April 2020. Approximately 1% complete.

## ATTACHMENT A Photos

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**Photo 1:** While installing a new pole at Z276646 (TL 629A), equipment was staged within the limits of the approved access road in accordance with MM BIO-1.

## ATTACHMENT A (Continued)



**Photo 2:** During fiber roll installation at TL 629A, two cultural monitors were present, a cultural resources ESA was delineated along the eastern perimeter of the work space, and gravel bags were used to weigh down the fiber rolls instead them being dug into the ground in accordance with the HPMP (MM CUL-1), APM CUL-03, and APM CUL-04.

## ATTACHMENT A (Continued)



**Photo 3:** A crew was observed drilling a pole hole at Z163184 (TL 629A). To comply with the CFPPP fire prevention matrix (on CNF land, PAL-C), a complete set of fire tools were staged on-site during drilling, and the crew were equipped with a water truck that would follow behind during the movement of the steel-tracked drill.



## ATTACHMENT A (Continued)



**Photo 4:** During pole setting at Z276641 (TL 629A), a hydrological resource was observed flagged along the approved road to the site, and a sign stating 'no grading, lift blade' was posted to minimize impacts to the stream in accordance with APM HYD-06.

## ATTACHMENT A (Continued)



**Photo 5:** A street sweeping machine was observed cleaning up debris associated with asphalt removal near 406+50 (C 440) in accordance with the SWPPP.

## ATTACHMENT A (Continued)



**Photo 6:** The concrete washout bin at Staging Area 2A (C 440) was observed to be covered in preparation for forecasted rain in accordance with the SWPPP.

## 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	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

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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	7/26/29	Refinements to TL 629A	Approved	8/14/19