

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 078 September 22, 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 September 9, 2019 through September 22, 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 Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs); drilling, installing and trimming rebar, and grouting for micropile foundations; drilling direct bury foundation holes; exporting dirt spoil; pouring concrete for pole installation; setting new steel poles; trenching and installing pole grounding wire and rods; spreading overhead distribution and transmission lines; dead-ending distribution and transmission lines after wire stringing; installing 12 kV disconnects; grounding de-energized lines; and conducting helicopter operations out of staging yards. Along TL 625C, CPUC ECMs observed construction crews removing and chipping vegetation; installing erosion control BMPs; mobilizing equipment; drilling and excavating pole and anchor holes; exporting dirt spoil; trenching and installing grounding wire and rods; drilling, grouting, and proof-testing for micropile foundations; spreading overhead lines; setting new steel poles; and installing anchors. Along C440, CPUC ECMs observed construction crews staging equipment, saw-cutting pavement, trenching, installing underground distribution line conduit, backfilling, covering open trench with steel plates and welding the plate, and paving over trenches with asphalt.

To prevent fugitive dust emissions during project activities, construction crews were observed applying water to prevent or mitigate fugitive dust at staging and fly yards, along unpaved access roads, and in active construction areas in accordance with APM AIR-02. 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 roads in accordance with APM AIR-03 and MM BIO-24. Construction crews applied water during drilling and used cuttings containment boxes to prevent dust emissions in accordance with APM AIR-05 (See Photo 1 – Attachment A).

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 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 around areas with special-status species, and those areas were observed being avoided by construction personnel. Excavations were 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.

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 signed and roped off to prevent construction access to areas with cultural resources 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 (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. Fire boxes were observed at staging yards and stocked with the required firefighting tools. Fire patrols were observed monitoring construction activities, checking 5-gallon backpack pumps to ensure they were completely full of water, and inspecting fire extinguishers to ensure they were fully charged and serviced within the year. In accordance with the CFPPP fire prevention matrices, construction crews were observed watering vegetation prior to and during mowing and chipping (See Photo 4 – Attachment A), wetting down surrounding areas before conducting hot work, and staffing dedicated fire patrols during hot work and when work occurred with energized lines.

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 parked equipment, staging spill kits at work sites, using double walled fuel tanks or implementing secondary containment beneath staged fuel tanks, 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), SWPPP (MM HYD-01, MM BIO-7), and APM HYD-09. Sediment and erosion control BMPs were observed being implemented along rights-of-way, and included the use of gravel bag check dams, gravel bag berms, perimeter fiber rolls or straw wattles, silt fence, and track out controls such as rattle plates and rock aprons at staging yards. Dirt stockpiles were managed by being covered with plastic sheets and surrounded with fiber rolls or watered (if in use), and a street sweeper was used for track out cleanup on paved surfaces. Biological monitors and a Qualified SWPPP Practitioner were observed inspecting BMPs along rights-of-way and communicated with SDG&E construction contractors where repairs and maintenance were needed at tailboard meetings and throughout the day. Hydrological resources were flagged for avoidance, and work activities occurred outside of hydrological resources in accordance with APM HYD-06 (See Photo 5 – Attachment A).

Construction sites were observed to be kept clean and tidy, and visual screening fence was observed in place around staging yards to reduce visual impacts in accordance with APM VIS-02.

Traffic control measures were observed being implemented in accordance with APM TRANS-01, APM TRANS-02, APM TRANS-03, APM TRANS-04, and APM TRANS-05 during this reporting period. Along TL 629A, ECMs observed traffic control crews stopping traffic during helicopter external load

operations occurring adjacent to Old Highway 80, and directing one-way traffic along Viejas Blvd and River Drive during overhead line work (See Photo 6 – Attachment A). Along TL 625C, lane closures were conducted to allow crews to work safely at work sites along Japatul Valley Road. At C 440, a clearly marked pilot vehicle was used to shuttle traffic through the construction zone along Sunrise Highway where one lane was closed for trenching activities.

Proper gate protocols were observed being implemented for access road authorized by the United States Forest Service (USFS). Gates were observed being closed and locked after ingress and egress in accordance with MM REC-2.

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

Seven Level 1 Minor Deviations were reported this reporting period.

SDG&E reported that on September 10, a construction crew member cleared vegetation beyond the delineated work space limits at Pole Z272982 on TL 629C, a deviation in MM BIO-1 (work spaces). Per SDG&E, the on-site biological monitor and other members of the construction crew stopped the crew member when they noticed him mowing outside of the approved work space limits. The topic of remaining within the approved work space limits and proper planning for difficult terrain was discussed with the crews.

On September 18, the CPUC ECM contacted SDG&E regarding work occurring along Phase 1 of C 440 on National Forest System (NFS) land during days with a Project Activity Level (PAL) of EV. The USFS approved the revised Construction Fire Prevention and Protection Plan on August 6, 2019, allowing crews to conduct underground utility construction activities on USFS lands on days with a PAL of EV; however, the authorization was only valid for 30 days until an extension was requested from SDG&E. Work that occurred on September 12, 16, 17, and 18, 2019 was conducted on USFS lands on EV days without a valid USFS authorization. SDG&E classified this as a Level 1 Minor Deviation, and plans to ensure that the proper authorization is requested and approved by the USFS prior to any underground utility construction activities on USFS lands during days with a PAL of EV.

On September 16, the CPUC ECM observed a qualified electrical worker parked in a vehicle outside of the designated access road in an open field south of Pole Z272912 on TL 625C (a deviation to MM BIO-1), and notified the SDG&E lead Biological Monitor for TL 625C. Per SDG&E, a “no project access” sign was placed on the road to prevent further incidents from occurring, and the topic of remaining with approved work limits and project access roads was discussed with construction crews.

SDG&E reported that on September 18, construction crews left the Merrigan Staging Yard on TL 629A at 6:35 a.m. and accessed the right-of-way between Pole Z172800 and Pole Z275475 prior to 7:00 a.m. to set up for wire stringing operations (a deviation to MM NOI-4). Per SDG&E, SDG&E spoke to crews about the importance of maintaining approved work hours during tailboard meetings and in management meeting with SDG&E and its contractors.

One Level 2 Minor Deviation was reported this reporting period.

On September 17, the CPUC ECM observed a construction crew member disposing of waste water from a concrete washout bin onto the gravel within Bookout Staging and Fly Yard along TL 625C, and notified the SDG&E lead environmental inspector. The discharge of the concrete washout water was in violation of Attachment A, Section J.2.b. i and ix of the Construction General Permit (CGP). Failure to comply with the CGP was not in compliance with APM HYD-05, MM BIO-7, or MM HYD-1, and resulted in a Level 2 Non-Compliance. Per SDG&E, the practice was immediately discontinued and the topic of proper waste water disposal was discussed with construction crews. SDG&E plans to sample run-off generated from Bookout Staging and Fly Yard during the next rain event, and will test the samples for pH, note the pH levels, and report any effluent standards exceedances in the CGP Annual Report for TL 625C.

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 682, TL 6957, TL 629C, TL 6958, C157, and C449

Completion pending final inspection and punch-list items. 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; drilled and excavated direct-bury and anchor holes; drilled for, tested, and capped micropile foundations; poured concrete; assembled and installed poles, anchors, and grounding rods; and conducted overhead work. The estimated completion date is July 2020. Approximately 29% 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 and anchors; poured concrete; conducted backfill operations; and conducted overhead work. The estimated completion date is August 2020. Approximately 20% complete.

C 440 Phase I

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; removed trees and vegetation from delineated work limits; saw-cut, excavated for, and installed conduit; slurried in conduit package; paved trench; potholed; sprayed hydraulic mulch; and installed vault lids. The estimated completion date is May 2020. Approximately 45% complete.

C79A

During this reporting period, construction crews installed, inspected, and maintained sediment control BMPs; removed vegetation from delineated work areas; excavated for tree root exploration; ground pavement; excavated for and installed vaults, vault lids, and ductbanks; and conducted compaction and backfill operations. The estimated completion date is April 2020. Approximately 3% complete.

ATTACHMENT A Photos



Photo 1: During drilling for a micropile foundation at Pole Z272950 (TL 625C), a crew was observed using a containment box to trap drill cuttings and reduce dust emissions from drilling in accordance with APM AIR-05.

ATTACHMENT A (Continued)



Photo 2: During mowing the construction only access to Pole Z272982 (TL 625C), a crew was observed mowing only within the approved and delineated road in accordance with MM BIO-1, and a biological monitor was observed present on site for vegetation clearing work in accordance with MM BIO-3.

ATTACHMENT A (Continued)



Photo 3: During trenching for the installation of underground utilities along C 440 on Wooded Hill Road, archaeological and cultural monitors were observed inspecting the excavation in accordance with the HPMP (MM CUL-1) and APM CUL-04.

ATTACHMENT A (Continued)



Photo 4: In preparation for vegetation clearing and chipping at Pole Z272992 (TL 625C), the area was wet down in accordance with the CFPPP Fire Matrix (MM FF-1) for chipping work on private land with a FPI of Elevated.

ATTACHMENT A (Continued)



Photo 5: During micropile drilling at Pole Z40255 (TL 629A), a jurisdictional drainage crossing along the site access road was flagged, gravel bags were installed, and timber mats were used to prevent impacts to the stream channel in accordance with APM HYD-06.

ATTACHMENT A (Continued)

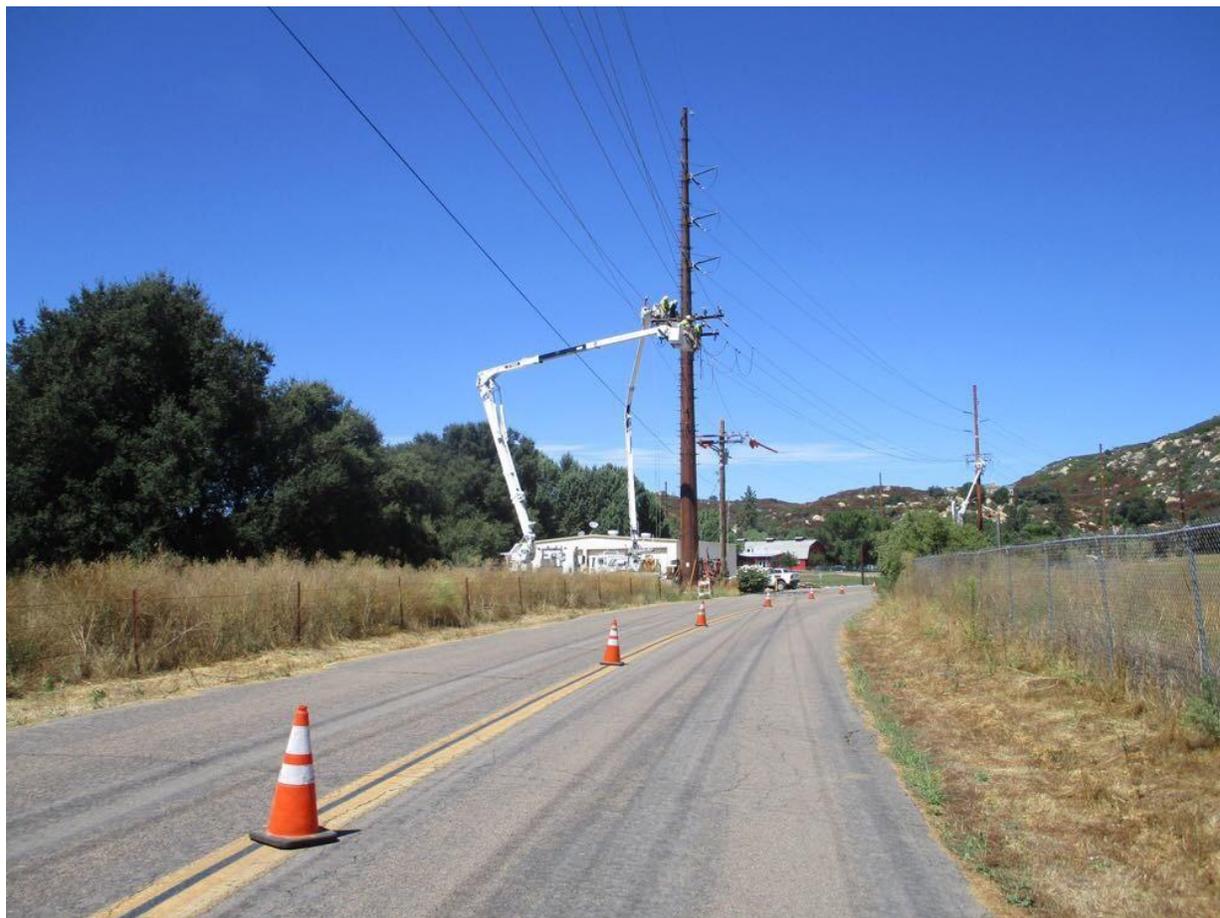


Photo 6: Construction crews observed dead-ending 12 kV lines at Pole Z872453 and Pole Z872452 (TL 629A). A Pro Traffic crew directed one-way traffic around staged equipment on River Drive in accordance with APM TRANS-02.

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

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	7/26/29	Refinements to TL 629A	Approved	8/14/19
039	9/5/19	Refinements to TL 625C	Approved	9/19/19