

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p>
	<p>Cleveland National Forest Power Line Replacement Projects</p> <p>Compliance Status Report: 079</p> <p>October 6, 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 September 23, 2019 through October 6, 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 C 79A, 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 drilling direct bury pole holes; hand-digging direct bury pole holes; installing pole anchors; trimming micropile casing; installing 12 kV intercepts; installing cross arms; preparing for cutout installation; stringing 12 kV wire; installing grounding wire and rods; cleaning up concrete rubble from pole installation; mobilizing construction equipment to and from work sites; conducting hot work (welding); and placing hazardous waste containers on secondary containment in staging yards. Along TL 625C, CPUC ECMs observed construction crews removing and chipping vegetation; installing Stormwater Pollution and Prevention Plan (SWPPP) erosion control best management practices (BMPs); perforating the surface (pre-drilling); drilling direct bury pole holes; placing rock in direct bury pole excavations to bring the excavation to depth; drilling, setting rebar, pressure grouting, and proof testing micropile foundations; setting new steel poles; installing pole anchors; installing grounding wire and rods; and mobilizing equipment to and from work sites, including via helicopter external load operations. Along C 440, CPUC ECMs observed construction crews excavating trenches for underground distribution line; installing PVC pipe in the trench; pouring concrete; paving over trenches with asphalt; conducting vault work; conducting grade repair work; and cleaning up spoils on the road. Along C 79A, CPUC ECMs observed construction crews trimming vegetation along the access road; installing erosion control BMPs; grinding asphalt; trenching; and installing conduit.

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 (See Photo 1 – Attachment A), 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.

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. In order to ensure crews were clear on approved access routes, CPUC ECMs observed additional “no project access” signs placed at the entrance to roads that were not approved for use. 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, and monitoring all other construction activities to ensure compliance with mitigation measures, applicant proposed measures, and permit conditions in accordance with MM BIO-22 (See Photo 2 – 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 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. The CPUC ECM confirmed pole locations that would be monitored along TL 625C per APM CUL-08.

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, 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 (see Photo 5 – Attachment A) 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. CPUC ECMs also communicated areas warranting inspection, such as the River Drive Staging Yard where sediment track-out was observed or where gaps in silt fencing occurred, and areas were observed to be repaired/maintained in accordance with the SWPPP. Hydrological resources

were flagged for avoidance, and work activities occurred outside of hydrological resources in accordance with APM HYD-06.

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 directing one-way traffic along Viejas Blvd, Oak Grove Drive, and River Drive during construction activities along the road. 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 (See Photo 6 – Attachment A).

Proper gate protocols were observed being implemented for access roads 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 MMRP.

Compliance Status

Two Level 1 Minor Deviations were reported this reporting period.

SDG&E reported that on September 27, a construction crew worked beyond the allowable construction hours, remaining on the Project right-of-way (ROW) until approximately 7:45 p.m. This occurred during the execution of the 12 kV cutover from Pole Z172809 to Pole Z373148 on TL 629A, which required sequential tasks to be finished before departing the ROW, resulting in a deviation to MM NOI-4. Per SDG&E, permitted work hours and extra-hour notification requirements were reviewed with necessary personnel.

SDG&E reported that on September 30, a construction crew worked beyond the allowable construction hours, remaining on the Project ROW until approximately 8:30 p.m. Crews had demobilized after completing 12 kV cutover work from Poles Z172800 to Pole Z172801 on TL 629A. However, SDG&E personnel observed that some customers were still operating generators because their service had not been restored. The problem was traced to Pole Z173875 where it was determined that one of the service drops had not been connected at the transformer. A Hot Line Order was secured to cover the work and the necessary connections were made to restore service; however, working beyond allowable construction

hours deviated from MM NOI-4. Per SDG&E, permitted work hours and extra-hour notification requirements were reviewed with necessary personnel.

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 October 2019. Approximately 99% complete.

TL 629A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; trimmed trees; perforated and drilled for direct bury pole holes and pier foundations; drilled for, grouted, and tested micropile foundations; excavated for and installed conduit; excavated for and installed poles and anchors; graded a parking area; removed poles; and conducted overhead work. The estimated completion date is July 2020. Approximately 33% complete.

TL625C

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; installed signage and flagging; removed spoils and vegetation from delineated work areas; drilled for, installed, grouted, and capped micropile foundations; excavated for direct bury poles, anchor holes, and grounding rods; installed anchors, grounding rods, and line protectors; assembled and installed poles and pole tops; poured concrete; and conducted overhead work. The estimated completion date is August 2020. Approximately 29% complete.

C 440 Phase I

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; excavated for and installed conduit; slurried in conduit package; conducted backfill operations; paved trench; and hydroseeded. The estimated completion date is May 2020. Approximately 51% complete.

C79A

During this reporting period, construction crews installed, inspected, and maintained sediment control BMPs; removed vegetation from delineated work areas; salvaged seedlings and saplings; ground pavement; excavated for and installed conduit, vaults, and ductbanks; and conducted compaction and backfill operations. The estimated completion date is April 2020. Approximately 7% complete.

ATTACHMENT A Photos



Photo 1: During direct bury pole hole drilling at Pole Z172738 (TL 629A), the crew was observed exporting spoils using a haul truck with a load cover in accordance with APM AIR-02.

ATTACHMENT A (Continued)



Photo 2: During pole base setting at Pole Z272930 (TL 625C), a Biological Monitor was observed monitoring the activity to ensure compliance with mitigation measures, applicant proposed measures, and permit conditions in accordance with MM BIO-22.

ATTACHMENT A (Continued)



Photo 3: During pole anchor excavation on TL 625C, 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 on the access road to Pole P119857 (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: Dirt stockpiles staged within a stringing site on Lookout Road (C 79A) were covered with plastic sheeting and surrounded by fiber rolls in accordance with the Erosion Control Plan and Storm Water Pollution Prevention Plan (MM HYD-01, MM BIO-7), and APM HYD-09.

ATTACHMENT A (Continued)



Photo 6: 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 (C 440) 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 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
038	7/26/29	Refinements to TL 629A	Approved	8/14/19
039	9/5/19	Refinements to TL 625C	Approved	9/19/19