	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 080** **October 20, 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 October 7, 2019 through October 20, 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 clearing vegetation; drilling and hand-digging direct bury pole holes; mobilizing construction equipment to and from work sites; drilling micropile foundation holes; rock drilling; conducting overhead work, including installing 69 kV jumpers, spreading wire, setting up for wire stringing operations, and stringing sock-line; and conducting helicopter external load operations to support dirt spoil export and equipment mobilization and demobilization. Along TL 625C, CPUC ECMs observed construction crews removing and chipping vegetation; trimming vegetation along access roads; installing Stormwater Pollution and Prevention Plan (SWPPP) erosion control best management practices (BMPs); perforating the surface (pre-drilling) for pole holes; drilling and hand digging pole and pole anchor holes; drilling, setting rebar, and proof testing for micropile foundations; setting new steel poles; trenching and installing grounding wire and rods; mobilizing equipment to and from work sites; grounding de-energized overhead lines; transferring wire and spreading wire; and conducting helicopter external load operations to support pole setting, dirt spoil export, and equipment mobilization and demobilization. Along C 440, CPUC ECMs observed construction crews excavating trenches for underground distribution line; installing conduit; slurrying-in conduit; excavating vault sweeps; installing vaults; preparing for paving over trenched areas; and pulling through mule tape in preparation for underground wire pulling. Along C 79A, CPUC EMs observed construction crews trimming vegetation along the underground work space limits; trenching, excavating vaults, installing vaults, installing conduit, and exporting dirt spoil off-site.

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, in preparation for helicopter external load operations (See Photo 1 – Attachment A), and in work 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, and spoil piles were watered and covered to prevent wind erosion.

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 “no project access” and “approved access” signs at the entrances to access roads. 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. In accordance with MM BIO-14 and MM BIO-16, Environmentally Sensitive Area (ESA) signs and flagging were observed around areas with

special-status plant species, and those areas were observed being avoided by construction personnel. Excavations were covered to prevent wildlife entrapment in accordance with MM BIO-23, and the CPUC ECM communicated with the lead biological monitor to ensure no gaps were present. 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. In areas with a high probability of cultural resources to occur, archeological and cultural monitors were observed initiating pole hole and grounding trench excavations per the HPMP and screening soils for potential cultural resources (See Photo 2 – Attachment A). Cultural ESAs were signed and roped off to prevent construction access to areas with cultural and/or historical resources in accordance with the HPMP.

In accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1), SDG&E and their construction contractors were observed communicating Fire Potential Index (FPI) and Project Activity Levels (PALs) to work crews at daily tailboard meetings, during which daily fire requirements and restrictions for work on private land and on National Forest System (NFS) land were discussed. 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 (See Photo 3 – Attachment A), and within 50 feet of truck-mounted stand-alone combustion engines and compressors in accordance with the CFPPP fire prevention matrices. Fire boxes were observed at staging yards and stocked with the required firefighting tools, including 3 round point shovels, 2 Pulaskis, 2 McLeods, and 1 full 5 gallon backpack pump. 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 vegetation mowing and chipping, wetting down surrounding areas before conducting hot work, and staffing dedicated fire patrols during hot work and when work occurred with overhead lines. For work on NFS land on days with the PAL designation of EV, dedicated fire patrols were present at each work site in accordance with the CFPPP fire prevention matrix for work on NFS land.

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 and beneath equipment during mechanical work (See Photo 4 – Attachment A), 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 (See Photo 5 – Attachment A), silt fence, plywood, and track out controls such as rattle plates and rock aprons at points of ingress and egress with 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 (See Photo 6 – Attachment A). CPUC ECMs observed biological monitors instructing construction crews to ensure plastic covers over dirt spoil piles were secure to prevent wind erosion during forecasted high wind events. 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, and a filter bag was utilized for discharge to land operations of rain water that had accumulated in an underground electrical vault along C 440 Phase 1.

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. CPUC ECM's observed traffic control crews helping to facilitate construction activities by directing one-way traffic along roads associated with TL 629A, TL 625C, and C 440 Phase 1. Motorists were notified of construction activities with signage, and guided around construction activities on or near public roadways with signs, cones, signals, and the use of a pilot car.

Proper gate protocols were observed being implemented for access roads authorized by the United States Forest Service. 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

One Level 1 Minor Deviation was reported this reporting period. SDG&E reported that on October 7, a line crew crane operator attempting to access Pole Z272919 (TL 625C) slid off an access road onto a non-Project related road, a deviation to MM BIO-1 (work spaces). A sloped area of approximately 35 feet by 10 feet was impacted, which included California Buckwheat (*Eriogonum fasciculatum*), laurel sumac

(*Molosma laurina*), black mustard (*Brassica negra*), and California scrub oak (*Quercus xacutidens).* No other biological resources or cultural resources were impacted. A "No Project Access" sign was placed on the road to prevent further incidents and the topic of remaining within approved work limits was discussed with construction crews.

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; removed and chipped vegetation within delineated work areas; trimmed trees; perforated and drilled for pier foundations; drilled for, grouted, and tested micropile foundations; excavated for and installed poles and grounding rods and wire; removed poles; and conducted overhead work and wire stringing. The estimated completion date is July 2020. Approximately 36% 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; perforated pole holes; excavated for direct bury poles, anchor holes, and grounding rods; installed anchors, grounding rods, and line protectors; installed poles; conducted pole top work; and conducted overhead work. The estimated completion date is August 2020. Approximately 38% complete.

C 440 Phase I

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; trimmed trees; installed vault lids; saw-cut and cored; excavated for, installed, and cleaned conduit and sweeps; slurried in conduit package; conducted backfill operations; and paved trench. The estimated completion date is May 2020. Approximately 55% complete.

C79A

During this reporting period, construction crews installed, inspected, and maintained sediment control BMPs; removed vegetation from delineated work areas; trimmed trees; 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 9% complete.

ATTACHMENT A
Photos

Photo 1: In preparation for the removal of micropile drilling equipment via helicopter external load operations at Pole Z172744 (TL 629A), the area was observed being watered down to mitigate dust emissions anticipated from rotor wash in accordance with APM AIR-02, APM AIR-05, the Aviation Safety Plan, and MM PHS-5.

Photo 2: Cultural monitors were observed leading an excavation of both the pole hole and the trench used for ground wire and rod installation at a site along TL 629A, and screening excavated material for potential cultural resources in accordance with the Historic Properties Management Plan, MM CUL-1, and APM-CUL-04.

Photo 3: During vegetation clearing within the designated work space at Pole Z273027 (TL 625C), two complete sets of fire tools, each containing 1 five gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher, were strategically placed within the work space so that no work would occur without a set within at least 50 feet, and without a round point shovel within at least 25 feet of an operating chainsaw. In addition, the crew was equipped with 100 gallons of water (with pump and hose), as is required by the CFPPP fire prevention matrix for work on NFS land that day.

Photo 4: While a worker conducted equipment maintenance on a chipping machine at Pole Z273032 (TL 625C), a drip pan was placed beneath the machine to prevent potential leaks or spills from being discharged into the soil in accordance with the Spill Response and Notification Plan and MM PHS-2.

Photo 5: To prevent off-site erosion during pole hole drilling at Pole Z272949 (TL 625C), the drill operator placed dirt spoils within the designated workspace surrounded by fiber rolls in accordance with the ECP (MM HYD-1) and SWPPP (MM BIO-7).

Photo 6: During preparation for paving over the underground distribution line trench at C 440 Phase 1, a street sweeper was observed being operated along Sunrise Highway to clean the road and prevent off-site erosion in accordance with the Erosion Control Plan and 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	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

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
040	9/12/19	Addition of Underground Alignment to C440	Approved	10/10/19