

|   |   |
|---|---|
|  | <p><b>California Public Utilities Commission</b><br/><b><i>Mitigation Monitoring, Compliance, and Reporting</i></b><br/><b><i>Program</i></b></p>             |
|   | <p><b>Cleveland National Forest Power Line Replacement</b><br/><b>Projects</b></p> <p><b>Compliance Status Report: 081</b></p> <p><b>November 3, 2019</b></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 October 21, 2019 through November 3, 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, and 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 excavating direct bury pole holes; rock drilling; drilling for micropile foundations; conducting erosion control maintenance; installing intercepts; conducting overhead wire stringing work, including sagging and dead-ending 69kV wire, and adjusting jumpers and installing disconnects for 12kV wire. Along TL 625C, CPUC ECMs observed construction crews hand digging or drilling for direct-bury poles and anchors and cleaning out excavation areas; perforating the surface (pre-drilling) for pole holes; drilling and proof-testing for micropile foundations; setting new steel poles and backfilling; installing grounding rods and wire; spreading overhead wire; and using helicopter external load operations to export spoils from sites. Along C 440, CPUC ECMs observed construction crews removing steel plates covering trenches; excavating trenches for underground distribution line; rock breaking; installing conduit; slurring-in conduit; and preparing for paving over trenched areas.

To prevent fugitive dust emissions during project activities, construction crews were observed applying water to prevent fugitive dust at staging and fly yards in preparation for helicopter external load operations, and along unpaved access roads (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. Additionally, track-out was observed being removed from paved access roads 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 (See Photo 2 – Attachment A). 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 observed 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 a grounding trench excavation per the HPMP, and screening soils for potential cultural resources. Cultural ESAs were signed and roped off to prevent construction access to areas with cultural and/or historical resources in accordance with the HPMP (See Photo 3 – Attachment A).

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 4 – 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 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 staged equipment (See Photo 5 – Attachment A) and beneath equipment during mechanical work, 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 Best Management Practices (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, 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 to clean up excavated dirt on paved surfaces (See Photo 6 – Attachment A). CPUC ECMs observed biological monitors working with construction crews to ensure plastic covers over dirt spoil piles were secure to prevent wind erosion. 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 at work sites along TL 625C where a spoil stockpile appeared to be partially uncovered, and along C 440 where gravel bags were observed to be ripped. Follow-up observations by CPUC ECMs in these areas concluded that repairs has been made in accordance with the timing requirements in mitigation. 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. CPUC ECMs 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 MMRP.

### ***Compliance Status***

No non-compliances or deviations occurred during 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 682, TL 6957, TL 629C, TL 6958, C157, and C449

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

TL 629A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; drilled for, grouted, and installed micropile foundations; perforated pole holes; excavated and drilled for, assembled, and installed poles; excavated conduit intercepts; installed grounding; conducted compaction and backfill operations; and conducted overhead work. The estimated completion date is July 2020. Approximately 37% complete.

#### TL625C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; drilled for, grouted, tested, and capped micropile foundations; installed poles, anchors, and grounding rods; tested anchors; conducted backfill operations; potholed; removed spoils; assembled and installed poles; installed grounding rods; poured concrete; and conducted overhead work. The estimated completion date is August 2020. Approximately 39% 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; installed vault lids; conducted backfill operations; and paved trench patches. The estimated completion date is June 2020. Approximately 56% complete.

#### C79A

During this reporting period, construction crews inspected and maintained sediment control BMPs; ground pavement; installed conduit and shoring; excavated for and installed vaults; and conducted compaction and backfill operations. The estimated completion date is April 2020. Approximately 11% complete.

## ATTACHMENT A Photos

---



**Photo 1:** Prior to crew ingress into Pole Z276634 (TL 629A), a water truck was observed wetting down the area to prevent dust emissions in accordance with APM AIR-02 and APM AIR-05.

## ATTACHMENT A (Continued)



**Photo 2:** During direct bury pole and anchor excavations at Pole P33490 (TL 625C), crews were observed remaining within clearly delineated work limits in accordance with MM BIO-1. SWPPP BMPs were observed in place in accordance with MM HYD-01, MM BIO-7, and APM HYD-09.

## ATTACHMENT A (Continued)



**Photo 3:** Along TL 629A, a micropile drilling crew was observed respecting a clearly delineated cultural ESA in an area with cultural and/or historical resources in accordance with APM CUL-03, the HPMP, and MM CUL-1.

## ATTACHMENT A (Continued)



**Photo 4:** During intercept installation at Pole Z172741 (TL 629A), a set of fire tools was observed within 50 feet of the activity in accordance with APM HAZ-04 and the CFPPP (MM FF-1).

## ATTACHMENT A (Continued)



**Photo 5:** During pole hole drilling at Pole Z172739 (TL 629A), the crew was observed using a drip pan beneath staged equipment to prevent leaks or spills from being discharged into the soil in accordance with MM PHS-2.

## ATTACHMENT A (Continued)



**Photo 6:** After trenching for the underground distribution line 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 ECP (MM HYD-1) and SWPPP (MM BIO-7).

## 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,<br>Revised<br>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,<br>Revised<br>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 | 7/26/19 | 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 |