

	<b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting</i></b> <b>Program</b>
	<b>Cleveland National Forest Power Line Replacement</b> <b>Projects</b>  <b>Compliance Status Report: 082</b>  <b>November 17, 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 November 4 through November 17, 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 mobilizing and staging equipment; excavating and drilling direct bury pole holes and anchor holes; excavating 12kV intercepts; framing new steel poles; removing old poles; conducting overhead work; conducting wire stringing work, including sagging and dead-ending 69kV conductor; and conducting helicopter external load operations in support of construction activities along the alignment. Along TL 625C, CPUC ECMs observed construction crews mobilizing and setting up equipment; removing and chipping vegetation; perforating pole holes; drilling and pressure grouting micropile foundations; drilling direct bury pole holes; digging pole and anchor excavations; cleaning out open excavations; setting rebar; trenching and installing grounding rods and wire; installing anchors; setting new steel poles; pouring concrete; conducting overhead work, including spreading wire and installing cross arms, installing wire protectors, and transferring wire to new steel poles; and using helicopter external load operations to mobilize equipment to work sites. Along C 440, CPUC ECMs observed construction crews grinding the pavement in preparation for trenching; excavating trenches for underground distribution line; installing conduit; setting vaults; and paving over trenched areas. Along C 79A, CPUC ECMs observed construction crews excavating for vaults, grinding the pavement in preparation for trenching; and installing conduit.

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, along unpaved access roads, 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 trenching (see Photo 1 – Attachment A) 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 “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 (see Photo 2 – Attachment A). 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 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, 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. 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 wetting down vegetation prior to removal and chipping (see Photo 4 – Attachment A) 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 staged equipment and beneath equipment during mechanical work, staging spill kits at work sites, and using double walled fuel tanks or implementing secondary containment beneath staged fuel tanks.

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 (see Photo 5 – Attachment A). 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. Biological monitors and a Qualified SWPPP Practitioner were observed inspecting BMPs along the alignments 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 gap in fiber rolls, downed silt fence, and sediment topping fiber rolls were observed. 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 through 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 (see Photo 6 – Attachment A). 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.

### ***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***

Three Level 1 Minor Deviations occurred during this reporting period.

SDG&E reported that on November 7, a skip loader was observed parked outside the work limits near station 83+00 on Phase I of C 440, near trench patching work, and several other tire tracks were also observed outside the work limits, resulting in a Level 1 Minor Deviation (MM BIO-1). Per SDG&E, 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 the crews.

SDG&E reported that on November 13, a biological monitor observed that a foundation hole cover was compromised at Pole Z173119 (TL 629A), resulting in a Level 1 Minor Deviation (MM BIO-23). Per SDG&E, the incident and the correct procedure for covering pole holes was discussed with all crews at the daily tailboard. In addition, all covered holes were inspected by construction and environmental crews.

SDG&E reported that on November 13, crews worked beyond the allowable construction hours at Poles Z273069 to Z172800 (TL 629A) without prior authorization. Wire transfers and equipment complications during stringing of new transmission conductor onto the new steel poles resulted in the work concluding at approximately 8:00 PM, resulting in a Level 1 Minor Deviation (MM NOI-4). Generator-powered light

plants were used to facilitate the work after dark. Per MM BIO-25, they were positioned and aimed away from adjacent native habitats to the extent possible. Per SDG&E, MM NOI-4 requirements and the need for proper planning to avoid future minor deviations were discussed at the daily tailboard.

## **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, 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 installed, inspected, and maintained sediment and erosion control BMPs; removed vegetation and spoils; trimmed trees; potholed; drilled for and capped micropile foundations; excavated and drilled for, perforated, assembled, topped, and installed poles; excavated anchor holes; installed anchors, grounding rods, and disconnects; poured concrete; conducted compaction and backfill operations; and conducted overhead work and wire stringing. The estimated completion date is July 2020. Approximately 41% complete.

### TL 625C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; removed vegetation and spoils; drilled for, installed, tested, capped, and grouted micropile foundations; excavated, perforated, and drilled pole holes; excavated for and installed anchors; assembled, topped, and installed poles; installed grounding rods; conducted compaction and backfill operations; poured concrete; topped old wooden poles; and conducted overhead work. The estimated completion date is August 2020. Approximately 42% complete.

### C 440 Phase I

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; removed vegetation; potholed; 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 59% complete.

### C 79A

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 17% complete.

## ATTACHMENT A Photos

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**Photo 1:** A crew at Pole Z293927 (TL 625C) was observed using water to minimize dust emissions during ground rod trenching in accordance with APM AIR-05.

## ATTACHMENT A (Continued)



**Photo 2:** The pole hole at Pole Z273006 (TL 625C) was observed to be securely covered to prevent wildlife entrapment in accordance with MM BIO-23.

## ATTACHMENT A (Continued)



**Photo 3:** Along C 79A, project personnel were observed avoiding 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. Additionally, Archaeological and Cultural Monitors were present to monitor excavations in accordance with the HPMP, MM CUL-1, MM CUL-3, and APM CUL-04.

## ATTACHMENT A (Continued)



**Photo 4:** A crew member was observed wetting down vegetation prior to removal and chipping at Pole Z273018 (TL 625C) in accordance with the CFPPP Fire Prevention Matrix for the activity on NFS land with a Project Activity Level (PAL) D. In addition, a complete set of fire tools was observed on site.

## ATTACHMENT A (Continued)

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**Photo 5:** The entrance to Staging Yard 2A (C 440) was observed to be stabilized with rattle plates and rock aprons in accordance with project Erosion Control Plan (ECP), SWPPP (MM HYD-01, MM BIO-7), and APM HYD-09.

## ATTACHMENT A (Continued)



**Photo 6:** During overhead dead-end activities at Pole Z172800 (TL 629A), one-way traffic was directed around the work site with the use of signage, cones, and flaggers in accordance with APM TRANS-02 and 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 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

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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	7/26/19	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