

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 083 December 1, 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 November 18 through December 1, 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 perforating, drilling, and digging pole holes; drilling for and proof testing micropile foundations; installing micropile rebar; framing and setting new poles; backfilling and compacting around new poles; transporting equipment via helicopter external load operations; trimming trees for line clearance and chipping; repairing 69 kV insulators; and cleaning up sites. Along TL 625C, CPUC ECMs observed construction crews mobilizing equipment; installing grounds; drilling for, pressure grouting, and proof testing micropile foundations; drilling and digging pole holes; digging anchor excavations; setting new poles; conducting overhead work, including transferring 69 kV conductor to new poles; trenching and installing grounding rods and wire; testing concrete; removing old wooden pole tops. Along C 440, CPUC ECMs observed construction crews cleaning out conduit; excavating for vaults; street sweeping; managing stockpiles; and cleaning up sites. Along C 79A, CPUC ECMs observed construction crews excavating trenches; installing conduit; transporting dirt; managing stockpiles; and cleaning up sites.

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 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. A CPUC ECM communicated with a lead on-site biological monitor regarding a fly basket that was observed outside the work limits on TL 629A, which SDG&E reported as a Level 1 Minor Deviation (see Compliance Status section below). 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. Crews were observed containing trash at work areas in accordance with MM BIO-26 (see Photo 2 – Attachment A).

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. During this reporting period, a tree trimming crew on TL 629A was observed coordinating with an on-site Fire Patrol to ensure that 100 gallons of water was on site prior to chipping vegetation, as required by the CFPPP.

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, using double walled fuel tanks or implementing secondary containment beneath staged fuel tanks, and covering containment that may contain hazardous materials during rain events (see Photo 4 – Attachment A).

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 (see Photo 5 – Attachment A) or watered (if in use). A street sweeper was used to clean up excavated dirt on paved surfaces, and a worker was observed cleaning up trackout on a paved road along TL 625C before a street sweeper arrived (see Photo 6 – Attachment A). 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 and TL 629A where sediment runoff was observed over fiber rolls. A CPUC ECM observed a crew digging an anchor excavation at a site along TL 625C that did not have any erosion control BMPs present, and contacted the lead on-site Biological Monitor who noted that BMPs would be installed by the end of the day. Follow-up observations by CPUC ECMs in these areas concluded that repairs had 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. 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 MMCRP.

Compliance Status

Four Level 1 Minor Deviations occurred during this reporting period.

SDG&E reported that on November 15, after a slurry seal operation was completed on C 449, the slurry seal aggregate material was spread in the turnout, instead of being removed as recommended by an Environmental Inspector (EI). The material is not appropriate to be spread on a County of San Diego Turnout and near a drainage feature. The SDG&E Field Construction Advisor and a County representative confirmed that the material needed to be removed. When the material had not been removed by November 18, it resulted in a Level 1 Minor Deviation (APM HYD-01, APM HYD-05, and APM HYD-09). Per SDG&E, the incident and the correct procedure for storing materials were discussed with crews at the daily tailboard.

SDG&E reported that on November 21, a crew swept up trackout on Viejas Grade Road and used a street sweeper to clean up the remaining wet sediment following drill demobilization from a nearby site. SDG&E compliance personnel later observed trackout from a different drill rig. The crew attempted to sweep up the wet sediment but eventually used a water buffalo to spray the remaining sediment off the public road without consulting with the EI/Biological Monitor, resulting in a Level 1 Minor Deviation (APM HYD-

05). Per SDG&E, the incident and correct procedures regarding trackout were discussed at the daily tailboard.

SDG&E reported that during SWPPP inspections during a rain event, it was found that concrete waste and washout had not been properly managed at Staging Yard 2A on C 440. A disposable cardboard washout bin had been left uncovered and its structure had been compromised when soaked by the rain, allowing concrete washout to spill or drain onto the ground. Nearby, concrete waste had been discharged onto visqueen or the ground and left uncovered. The uncontained and uncovered bin potentially allowed stormwater to become contaminated prior to discharging from the Project workspace. The management of materials resulted in a Level 1 Minor Deviation (APM HYD-01). The failure to contain and cover the material prior to a rain event is a general SWPPP violation (APM HYD-05). Discharge of contaminated, potentially hazardous stormwater from the poorly managed material is in violation of APM HYD-09. Personnel collected and covered the material (to the extent possible) during the rain event, but handling of some of the material required equipment that was unavailable at the time. The material has since been collected and contained. The incident deviated from APM HYD-01, APM HYD-05, and APM HYD-09 and resulted in a Level 1 Minor Deviation. Per SDG&E, EIs coordinated with construction contractors to institute more stringent supervision and management of the concrete washout operation and the concrete waste containment and storage site.

On November 25, a CPUC ECM observed a fly basket staged outside of the work area for Pole Z173111 (TL 629A) during pole setting activities. The incident resulted in a Level 1 Minor Deviation (MM BIO-1). SDG&E reiterated to construction contractors the importance of following communication and approval protocols for extra workspace.

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 December 2019. Approximately 99% complete.

TL 629A

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; installed flagging; removed and chipped vegetation; trimmed trees; drilled and perforated for, capped, tested, and installed micropile foundations; excavated for foundations; removed poles; excavated, drilled, and perforated pole holes; installed poles and grounding rods; installed poles; poured concrete; conducted backfill and tamping operations; and conducted overhead work. The estimated completion date is July 2020. Approximately 43% complete.

TL 625C

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

C 440 Phase I

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; excavated for and installed conduit; slurried in conduit package; mandrelled the installed conduit; installed, stripped, grouted, and finished vault lids; and paved. The estimated completion date is August 2020. Approximately 61% complete.

C 79A

During this reporting period, construction crews installed, inspected, and maintained sediment control BMPs; ground pavement; potholed; excavated for and installed vaults; installed conduit and duct banks; set vault lids; and conducted compaction and backfill operations. The estimated completion date is April 2020. Approximately 17% complete.

ATTACHMENT A Photos



Photo 1: A micropile drilling crew at Pole Z273014 (TL 625C) was observed using a covered containment box to trap drill cuttings and reduce dust emissions during micropile drilling in accordance with APM AIR-05.

ATTACHMENT A (Continued)



Photo 2: During pole hole digging at Pole Z276631 (TL 629A), the crew was observed working within clearly delineated work limits in accordance with MM BIO-1, and a trash bag was observed on site to contain trash throughout the day in accordance with MM BIO-26.

ATTACHMENT A (Continued)



Photo 3: Along C 79A, rope and signage delineating cultural resources ESAs were in place and being adhered to by crews in accordance with the HPMP, APM CUL-03, and MM CUL-1. Additionally, fiber rolls were observed to be in good condition and spoils stockpiles were observed to be covered, in accordance with the Erosion Control Plan and SWPPP.

ATTACHMENT A (Continued)



Photo 4: In accordance with the SNRP and MM PHS-2, a fuel cell at Pole Z173163 (TL 629A) was observed to be covered during a rain event in order to prevent the containment from filling up and any possible hazardous materials from making contact with the ground.

ATTACHMENT A (Continued)



Photo 5: Crews were observed covering an asphalt stockpile and securing surrounding fiber rolls at a Staging Area along C 440 in preparation for a forecasted rain event, in accordance with the ECP and SWPPP.

ATTACHMENT A (Continued)



Photo 6: In accordance with the ECP and SWPPP, a worker was observed cleaning up trackout left on Viejas Grade Road that was left by drill demobilization. The worker noted that a street sweeper was being mobilized to the area as well.

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
CPUC-024	November 22, 2019	Reconstruction of TL 6923	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	7/26/19	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
041	10/2/19	Refinements to TL 6923	Approved	11/22/19