

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 084 December 15, 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 December 2 through December 15, 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, TL 6923, Circuit (C) 440, and C 79A, and the associated staging/fly yards. Areas of active and inactive construction were observed to verify implementation of the mitigation measures stipulated in the project's MMCRP. Observations were documented using site inspection forms. Applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed for implementation in the field.

Implementation Actions

During this reporting period along TL 629A, CPUC ECMs observed construction crews drilling and digging pole holes; drilling for and proof testing micropile foundations; conducting overhead work, spreading overhead wire, and framing and setting new poles (see Photo 1 – Attachment A); backfilling and compacting around new poles; conducting line work to service homes; transporting equipment via helicopter external load operations; trimming trees for line clearance and chipping; and trenching for the installation of grounding wire. Along TL 625C, CPUC ECMs observed construction crews mobilizing equipment; drilling for, pressure grouting, proof testing, and capping micropile foundations; drilling and digging pole holes; conducting overhead work, installing grounds; installing cross arms, spreading wire, installing wire protectors, framing and setting new poles; backfilling around new poles with concrete; conducting earth work; and trenching and installing grounding rods and wire. Along TL6923, CPUC ECMs observed crews mobilizing equipment and materials; conducting maintenance grading of access roads; and clearing vegetation and installing erosion control BMP's for pole work spaces. Along C 440, CPUC ECMs observed construction crews saw-cutting and removing asphalt; trenching; excavating vaults; installing conduit package and slurring it in; paving over trench; de-watering vaults and trench; and street sweeping. Along C 79A, CPUC ECMs observed construction crews trenching; excavating vaults; installing conduit package; transporting dirt and managing dirt stockpiles; conducting erosion control BMP maintenance; 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 access roads in accordance with APM AIR-03 and MM BIO-24. Construction crews applied water during drilling and used cuttings containment boxes to prevent dust emissions in accordance with APM AIR-05.

Approved workspaces were observed delineated with staking and flagging, and work crews were observed adhering to work space limits and staying on approved access roads in accordance with MM BIO-1. In order to ensure crews were clear on approved access routes, CPUC ECMs observed “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 (see Photo 2 – Attachment A). In accordance with MM BIO-14 and MM BIO-16, Environmentally Sensitive Area (ESA) signs and flagging were observed around areas with special-status 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 crews were observed containing trash at work areas in accordance with MM BIO-26.

CPUC ECMs observed cultural resource monitors, including archaeological and Native American monitors, monitoring construction activities that occurred within or adjacent to identified archaeological or cultural resource site boundaries in accordance with the Historic Properties Management Plan (HPMP), MM CUL-1, MM CUL-3, and APM CUL-04 (see Photo 3 – Attachment A). 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, and work crews were observed respecting cultural ESA boundaries.

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.

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, beneath equipment during mechanical work and re-fueling (see Photo 4 – Attachment A), staging spill kits at work sites, using double walled fuel tanks or implementing secondary containment beneath staged fuel tanks, covering containment that may contain hazardous materials during rain events, 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 (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). 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 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.

Construction sites were observed being 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. Traffic was observed being temporarily stopped when helicopter external load operations crossed over public roadways (see Photo 6 – Attachment A), and construction and traffic control crews adhered to specific traffic control restrictions within a half mile of schools.

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

Nine Level 1 Minor Deviations occurred during this reporting period.

SDG&E reported that on December 3, 6, and 10, pole holes along TL 625 C were improperly covered at Z272990, Z273009, and P275837, respectively. A Western toad (*Anaxyrus boreas*) and a deceased mouse of an unknown species were removed from the hole at Z272990; 10 Baja California tree frogs (*Pseudacris hypochondriaca*) were removed from the hole at Z273009; and a Western toad (*Anaxyrus boreas*) was removed from the hole at P275837. Improper covering resulted in a Level 1 Minor Deviation (MM BIO-23). Per SDG&E, all crew members responsible for covering holes were given an additional training on proper hole protection.

SDG&E reported that on December 5, a construction contractor truck slid off the north side of a construction-only access road between Poles Z273030 and Z273031 on TL 625C. The impacted area was approximately 18 feet in length by 3 feet in width. The Marooka crane used to pull out the truck impacted the same area on the north side of the road, this time the impact area was approximately 15 feet in length by 3 feet in width. The impacted area had native vegetation, but no sensitive plants were observed. An archeological monitor confirmed that no cultural resources were impacted. The off-road incident resulted in a Level 1 Minor Deviation (MM BIO-1). Per SDG&E, at the morning tailboard, it was relayed to all crews the importance of assessing road conditions prior to use to prevent such incidents from occurring, and the importance of staying on approved access roads.

SDG&E reported that on December 11, multiple tire tracks were observed outside of the access road to Pole Z272952 on TL 625C. It appears that in order to leave the site, construction crews drove their vehicles around a staged bucket truck instead of moving the bucket truck out of the way. Minimal vegetation – non-native black mustard (*Brassica nigra*) and vinegar weed (*Trichostema lanceolatum*) – was impacted in the area, which was approximately 20 feet by 10 feet. The off-road incident resulted in a Level 1 Minor Deviation (MM BIO-1). Per SDG&E, at the morning tailboard, the importance of staying on approved access roads was relayed to all crews.

On December 11, a construction crew used a helicopter to set a pole base at Pole Z272956 on TL 625C. After the helicopter departed the site, the CPUC ECM inspected the site and did not observe any fire tools. The incident resulted in a Level 1 Minor Deviation (MM FF-1). Per SDG&E, at the morning tailboard, all crews and were reminded of the requirement for fire tools, which was also communicated to construction management.

SDG&E reported that on December 11, construction crews remained on the TL 629A right-of-way until 7:20 p.m., past the approved construction time frame. This resulted in a Level 1 Minor Deviation (MM NOI-4). Per SDG&E, at the morning tailboard, the importance of better planning and being in compliance with noise ordinances and associated MMs was relayed to all crews.

SDG&E reported that on December 12, while dewatering a trench near Station Number 12+00 for Phase I of C 440, a construction crew discharged water off site; this was not in compliance with the Construction General Permit (CGP). While dewatering discharges are allowed off site, they must be monitored and meet applicable numeric action levels (NALs), in accordance with the requirements of the CGP and SWPPP for C 440. The incident resulted in a Level 1 Minor Deviation (APM HYD-05 and APM HYD-08). Per SDG&E, the amount of water discharged was below the thresholds of reportable discharge. A water sample was taken for testing; it did not exceed the NALs.

SDG&E reported that on December 12, a construction crew removed hand-cut vegetation from the workspace at Pole Z46584 on TL 6923. The crew moved the vegetation by hand via a footpath to the adjacent access road, where it was chipped using a trailer chipper. The chipped material was then stockpiled on a vegetated slope along the edge of an access road within an unapproved area of native vegetation. The approximately six-square-foot impacted area included native grasses and perennials, and potentially contained small shrubs such as sagebrush (*Artemisia sp.*) and deerweed (*Acmispon glaber*) that were buried by the chipped vegetation. The incident resulted in a Level 1 Minor Deviation (MM BIO-1). Per SDG&E, prior to the incident, an Environmental Inspector and the construction foreman discussed and agreed upon a plan to remove the vegetation at Pole Z46584 by hand to a trailer parked on the access road, and then transport it to Bartlett Staging Yard where it would be chipped and properly disposed. Construction crews removed the chipped material from the edge of the access road the following morning, and the crew resumed the original plan of chipping the vegetation at Bartlett Staging Yard.

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 C 449

Completion pending final inspection and punch-list items. Approximately 99% complete.

TL 629A

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; installed flagging for sapling avoidance; removed and chipped vegetation; trimmed trees; drilled for, capped, tested micropile foundations; drilled and excavated pole holes; installed grounding wire and rods; assembled and installed poles; poured concrete; conducted backfill and tamping operations; and conducted overhead work. The estimated completion date is July 2020. Approximately 48% complete.

TL 625C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; removed spoils and rock; drilled and perforated for, installed, tested, capped, and grouted micropile foundations; excavated for, assembled, installed, and topped poles; installed grounding rods; poured concrete; conducted backfill operations; and conducted overhead work. The estimated completion date is May 2020. Approximately 62% complete.

TL 6923

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; installed signage; removed and chipped vegetation; trimmed trees; conducted access road maintenance; conducted compaction operations; and developed Sol Valley Staging and Fly Yard.

C 440 Phase I

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; ground pavement; excavated for and installed conduit; slurried in conduit package; mandrelled the installed conduit; installed, stripped and finished vault lids; and paved and graded. The estimated completion date is August 2020. Approximately 65% complete.

C 79A

During this reporting period, construction crews installed, inspected, and maintained sediment control BMPs; plowed snow and cleared workspaces; ground pavement; excavated for and installed vaults; installed conduit and duct banks; and conducted compaction and backfill operations. The estimated completion date is May 2020. Approximately 28% complete.

ATTACHMENT A Photos



Photo 1: A line crew observed conducting overhead wire work and installing wire protectors in preparation for pole setting at Poles P164041 and P164042 along TL 629A.

ATTACHMENT A (Continued)



Photo 2: While construction crews installed conduit package near Vault 1 along C 440, a biological monitor was observed inspecting the site to ensure compliance with MMs, APMS, and permit conditions in accordance with MM BIO-22.

ATTACHMENT A (Continued)



Photo 3: Along C 79A near station 36+00, during trenching, soil export, and conduit installation, cultural monitors were observed inspecting excavated soils and viewing trench sidewalls to prevent unauthorized impacts to potentially buried cultural resources in accordance with the HPMP, MM CUL-1, and APM CUL-04.

ATTACHMENT A (Continued)



Photo 4: To prevent leaks and spills from being discharged into the soil during vegetation clearing work at Pole Z46583 (TL 6923), the construction crew refueled equipment over a drip pan in accordance with the SNRP and MM PHS-2.

ATTACHMENT A (Continued)



Photo 5: A construction crew observed installing straw wattles for erosion and sediment control around the workspace perimeter at Pole Z46583 (TL 6923) in accordance with the ECP and SWPPP.

ATTACHMENT A (Continued)



Photo 6: In accordance with the APM TRANS-02 and the Aviation Safety Plan (MM PHS-5), traffic control measures such as cones, signage, and flaggers were observed being used to regulate traffic and prevent the public from accessing Wildwood Glen Fly Yard (TL 625C), where helicopter external load operations supporting pole installation were being conducted.

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
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
042	10/29/19	Addition of temporary access/entry/turnaround areas, temporary pole work areas, and footpaths at Poles Z774861, Z774862, Z774863, and Z774864	Approved	12/9/19