

	<p><b>California Public Utilities Commission</b>  <b><i>Mitigation Monitoring, Compliance, and Reporting Program</i></b></p>
	<p><b>Cleveland National Forest Power Line Replacement Projects</b></p> <p><b>Compliance Status Report: 086</b></p> <p><b>January 12, 2020</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 December 30, 2019 through January 12, 2020.

**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 micropile foundations, digging direct bury pole holes, trenching for grounding rods and wire, spreading wire, and conducting wire work associated with customer service line stringing. Along TL 625C, CPUC ECMs observed construction crews mobilizing equipment and materials, grouting micropile foundations, drilling direct bury pole holes, conducting overhead work including installation of cross arms and transformers, setting new steel poles, and conducting helicopter external load operations in support of construction activities. Along TL6923, CPUC ECMs observed crews setting up equipment, clearing vegetation, installing erosion control BMPs, drilling direct bury pole holes (Photo 1 – Attachment A), and installing Arroyo toad exclusionary fencing. Along C 440, CPUC ECMs observed construction crews trenching, installing conduit package and adding slurry, grinding and paving, setting pads, covering trenches with steel plates, saw cutting, street sweeping, conducting hot work (welding), and excavating a retaining wall for a hillside vault. Along C 79A, CPUC ECMs observed construction crews cleaning snow from the road, conducting erosion control BMP maintenance, grinding, trenching, installing conduit, and backfilling.

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 perforating and 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 (Photo 1 – 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. CPUC ECMs confirmed with biological monitors that surveys for nesting raptor species were conducted prior to vegetation clearing activities along TL 6293. 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. Where construction can occur in habitat where Arroyo toads are widely distributed, work sites were fenced at the direction of the Arroyo Toad Authorized Biologist in accordance with APM BIO-3 (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 (Photo 3 – Attachment A). Cultural ESAs were signed and roped off to prevent construction access to areas with cultural and/or historical resources in accordance with the HPMP, 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; Photo 1 – Attachment A). Construction crews were observed staging a set of fire tools within 50 feet of work activities as required by APM HAZ-04 (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. 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, 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, 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 tack-out and debris on paved surfaces (Photo 5 – Attachment A). 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. During this reporting period, CPUC ECMs communicated areas warranting inspection, such as a partially uncovered spoils stockpile at a site

on TL 629A and a concrete washout bin at risk of overflowing on C 440. Follow-up observations by CPUC ECMs in these areas concluded that repairs had been made in accordance with the timing requirements in mitigation. Additional BMP maintenance was observed, including the removal of excess sediment along installed silt fencing and fiber rolls.

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 625C, C 440 Phase 1, and TL 629A (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. Traffic was observed being temporarily stopped when helicopter external load operations crossed over public roadways, 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 MMRP.

### ***Compliance Status***

Three Level 1 Minor Deviations occurred during this reporting period.

SDG&E reported that on January 6, an Environmental Inspector observed an uncovered spoils stockpile at Pole Z273027 on TL 625C. This was first reported to the construction contractor's Inspector on December 13, 2019 in order to schedule appropriate maintenance. The issue was reported again on December 16 and 19, 2019 after BMP inspections on those dates revealed that no maintenance had occurred. An additional BMP inspection on December 20, 2019 revealed that the stockpile was still uncovered. The stockpile remained uncovered as of January 6, 2020. The incident is in violation of the ECP and SWPPP and resulted in a Level 1 Minor Deviation. At the morning tailboard, the importance of proper stockpile management was conveyed to all crews.

SDG&E reported that on January 10, a crew member walked beyond the approved work area between Old Highway 80 and Pole Z40406 on TL 629A. "No Project Access" signs had been installed at this location to prevent access, but the crew member ignored the signs as well as directions from the Environmental Inspector. The incident violated MM BIO-1 and resulted in a Level 1 Minor Deviation. At the morning tailboard, the importance of staying within approved work areas and reading and obeying field signage was conveyed to all crews.

On January 10, a CPUC ECM observed that a complete set of fire tools was not present during chipping activities at Pole Z972835 on TL 6923. The incident violated the project's CFPPP, MM FF-1, and APM HAZ-04 and resulted in a Level 1 Minor Deviation. At the morning tailboard, all crews were reminded of the importance of fire tools.

## **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 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 inspected and maintained sediment and erosion control BMPs; drilled for, grouted, installed, and tested micropile foundations; excavated and drilled for, installed, and topped poles; installed cross arms; set pole bases; excavated for and installed conduit; removed spoil; and conducted overhead and wire stringing operations. The estimated completion date is July 2020. Approximately 53% complete.

### TL 625C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; removed vegetation, concrete, spoils, and sand bags; drilled for, installed, grouted, and trimmed micropile foundations; excavated for, assembled, framed, and topped poles; installed grounding rods and rock base; poured concrete; spread stockpiled soil; and conducted overhead operations. The estimated completion date is May 2020. Approximately 66% complete.

### TL 6923

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; removed and chipped vegetation; installed fencing and flagged areas for avoidance; assembled and installed poles; poured concrete; and conducted grading and maintenance work on access roads.

### 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; conducted backfill operations; mandrelled the installed conduit; conducted backfill operations; set vault pads; stripped and finished vault lids; and graded and paved. The estimated completion date is August 2020. Approximately 69% complete.

C 79A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; cleared snow and ice; trimmed trees; excavated for and installed conduit and vaults; conducted compaction and backfill operations; and ground asphalt. The estimated completion date is May 2020. Approximately 37% complete.

## ATTACHMENT A Photos

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**Photo 1:** A crew was observed drilling a direct bury pole hole at Pole Z46586 (TL 6923) within the approved work limits in accordance with MM BIO-1 and with a complete set of fire tools on the drill equipment in accordance with APM HAZ-04 and the CFPPP.

## ATTACHMENT A (Continued)



**Photo 2:** In accordance with APM BIO-3, a crew was observed installing Arroyo toad exclusionary fencing at Pole Z972845 (TL 6923) at the direction of the Arroyo Toad Authorized Biologist.

## ATTACHMENT A (Continued)



**Photo 3:** During trenching along C 79A, Archaeological and Cultural Monitors were observed inspecting soils and viewing trench sidewalls in accordance with the HPMP, MM CUL-1, and APM CUL-04.

## ATTACHMENT A (Continued)



**Photo 4:** During grinding near station 57+50 on C 79A, a full set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) was staged within 50 feet of the activity in accordance with APM HAZ-04 and the CFPPP.

## ATTACHMENT A (Continued)

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**Photo 5:** A street sweeper was used to clean up debris resulting from saw cutting near station 230+50 (C 440) along Sunrise Highway, in accordance with the ECP and SWPPP.

## ATTACHMENT A (Continued)



**Photo 6:** During wire work associated with the stringing of a customer service line at Pole Z774865 (TL 629A), cones and flagpersons were used to direct one-way traffic around construction equipment on Pine Valley Road in accordance with APM TRANS-02.

## 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	Interset Pole on TL 682	Approved	9/24/18
022	10/16/18	Refinements to TL 6958 (formerly TL 629D)	Approved	11/30/18
023	11/15/18	Expansion of the Buckman Springs Fly Yard and addition of the Old Buckman Springs Staging Yard and Rodriguez Staging Yard	Approved, with Conditions	12/4/18
024	11/26/18	Request to use the Pacific Crest Trail for access along C 449 and TL 629C	Approved	1/3/19
025	12/11/18	Bartlett Staging Yard	Approved	1/22/19
026	2/22/19	Refinements to TL 629A	Approved	4/19/19
027	3/1/19, Revised 3/8/19	Expansion of the Cameron Staging Yard	Approved	3/12/19
028	3/7/19	Underground workspaces at three existing pole locations on C 449	Approved	3/12/19

## 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
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
043	12/27/19	Replacement pole location adjustment and addition of temporary workspace at Pole Z272939	Approved	1/9/20