

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i></p>
	<p>Cleveland National Forest Power Line Replacement Projects</p> <p>Compliance Status Report: 087</p> <p>January 26, 2020</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 January 13 through January 26, 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 installing erosion control BMPs and Arroyo toad exclusionary fencing, applying hydraulic mulch at work sites, framing pole tops, installing wire protectors and re-configuring overhead lines, and conducting 12 kV wire stringing work including conductor sagging and dead-end operations. Along TL 625C, CPUC ECMs observed construction crews drilling for, testing, and capping micropile foundations; dewatering; drilling direct bury pole holes; transporting equipment via helicopter external load operations; setting up equipment; trenching for grounding rods and wire; removing old wooden pole tops; and conducting overhead work associated with wire stringing operations. Along TL 6923, CPUC ECMs observed construction crews removing vegetation, installing erosion control BMPs, mobilizing equipment, drilling micropile foundations (Photo 1 – Attachment A), and perforating and drilling direct bury pole holes. Along C 440, CPUC ECMs observed construction crews removing vegetation (Photo 2 – Attachment A), installing erosion control BMPs, conducting hot work, grinding, trenching and breaking rock, installing conduit and adding slurry, trench patching, paving, and building forms for a hillside vault retaining wall. Along C 79A, CPUC ECMs observed construction crews maintaining erosion control BMPs, trenching and breaking rock, managing spoils stockpiles, patching the road, cleaning up sites, and loading boulders for demobilization from the site.

To prevent fugitive dust emissions during project activities, construction crews were observed applying water 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 (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 an on-site biological monitor regarding equipment observed outside the approved work limits on TL 625C, 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 (see Photo 2 – Attachment A), and monitoring all other construction activities to ensure compliance with mitigation measures, applicant proposed measures, and permit conditions in accordance with MM BIO-22. Excavations were observed to be 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. Along TL 629A, hydromulch was installed where necessary, and a CPUC ECM communicated with a lead on-site

biological monitor to ensure proper seeding had occurred in accordance with the Habitat Restoration Plan and MM BIO-4. A helicopter buffer was implemented to prevent impacts to nesting bird species observed and monitored along TL 625C, in accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) and MM BIO-28.

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. Cultural ESAs were marked 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 hot work (see Photo 3 – Attachment A) and 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. A CPUC ECM communicated with the SDG&E Fire Coordinator to clarify fire mitigation requirements for a brush mower, which was being used to chip vegetation on TL 6923, and ensure the crew was meeting the requirements.

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. BMPs included the use of gravel bag check dams, gravel bag berms, perimeter fiber rolls or straw wattles, silt fence (see Photo 5 – Attachment A), 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 (see Photo 6 – Attachment A), 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, 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

Two Level 1 Minor Deviations occurred during this reporting period.

SGD&E reported that on January 23, stringing equipment and a bucket truck were staged on vegetation outside the approved work limits at Stringing Site 12 on TL 625C. The impacted native vegetation included scrub oak (*Quercus berberidifolia*), chamise (*Adenostoma fasciculatum*), and buckwheat (*Eriogonum fasciculatum*). The area was also labeled as occupied habitat for Hermes copper butterfly (*Lycanea hermes*). The incident violated MM BIO-1 and resulted in a Level 1 Minor Deviation. Crews were able to remove the bucket truck from the vegetation at the end of the day but were unable to move the stringing equipment during wire-stringing activities. Correct parking procedures were reviewed with crews.

SGD&E reported that on January 23, PAR crews completely removed Pole P246936S from TL629A; however, due to cultural constraints, this pole was only supposed to be cut at ground level and left in place. Work at this location was not outlined in the Plan of the Day, although removing the pole was within

the scope of wire-stringing operations between Poles P208905 and Z173062. The incident violated MM-CUL-03 requiring cultural monitoring at this location for any ground disturbance, as well as HPMP guideline 3.1.3.7 Distribution Pole in Site and resulted in a Level 1 Minor Deviation. No environmental resources were damaged, and cultural monitors determined that there were no cultural resources impacts. Correct procedures were reviewed with crews during a tailboard meeting, and signage will be posted in the future for poles that are planned for removal.

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 installed, inspected, and maintained sediment and erosion control BMPs; trimmed trees; removed exclusion fencing; drilled for, grouted, tested, and capped micropile foundations; drilled and excavated for, assembled, installed, and topped poles; set pole bases; conducted backfill and cleanup operations; graded; removed spoils; and conducted overhead operations. The estimated completion date is July 2020. Approximately 58% complete.

TL 625C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; drilled for, installed, capped, grouted, tested, and trimmed micropile foundations; assembled, topped, installed, and removed poles; installed grounding rods and rock base; poured concrete; conducted backfill operations; removed spoils; and conducted overhead and wire stringing operations. The estimated completion date is May 2020. Approximately 69% complete.

TL 6923

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; maintained exclusion fencing; removed and chipped vegetation; drilled for micropile foundations; excavated for, assembled, and installed poles; excavated for anchors; poured concrete; and conducted backfill operations. The estimated completion date is October 2020. Approximately 10% complete.

C 440 Phase I

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, removed vegetation, excavated for and installed conduit, slurried-in conduit package, mandrelled

the installed conduit, and paved. The estimated completion date is August 2020. Approximately 71% complete.

C 79A

During this reporting period, construction crews inspected and maintained sediment control BMPs; excavated for and installed conduit, vaults, and ductbanks; and conducted compaction and backfill operations. The estimated completion date is May 2020. Approximately 45% complete.

ATTACHMENT A Photos



Photo 1: During micropile drilling at Pole Z972890 (TL 6923), a containment box was used to trap drill cuttings and reduce dust emissions in accordance with APM AIR-05.

ATTACHMENT A (Continued)



Photo 2: During vegetation removal on the access road to Pole P40065 (C 440), a biological monitor was observed monitoring the activity in accordance with MM BIO-3, and the crew was observed remaining within clearly delineated work limits in accordance with MM BIO-1.

ATTACHMENT A (Continued)



Photo 3: A Dedicated fire patrol, equipped with a full set of fire tools (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher), was observed monitoring hot work near station 211+20 (C 440) in accordance with the CFPPP. The fire patrol noted that he had also wet down the surrounding area prior to the activity.

ATTACHMENT A (Continued)



Photo 4: A vegetation removal crew was observed using a drip pan while refueling tools at Pole Z571489 (TL 6923) to prevent leaks or spills from being discharged onto the ground in accordance with MM PHS-2 and the SRNP.

ATTACHMENT A (Continued)



Photo 5: Silt fence at Azalea Staging Yard (C 79A) was observed to be in good condition in accordance with the ECP and SWPPP.

ATTACHMENT A (Continued)



Photo 6: During overhead work associated with 12 kV wire stringing at Pole Z172738 (TL 629 A), a traffic control crew directed one-way traffic around the activity on Oak Grove Drive in accordance with the TCP and 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 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	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

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