

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 089 February 23, 2020

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 February 10 through February 23, 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 setting up sites, excavating pole holes, setting new poles, and conducting 12 kV and fiber optic wire stringing operations including dead-end operations. Along TL 625C, CPUC ECMs observed construction crews loading materials, setting up sites, installing grounds, replacing fiber rolls, setting pole tops, and conducting overhead work associated with 69 kV and 12 kV wire stringing operations including jumper installation. Along TL 6923, CPUC ECMs observed construction crews mobilizing equipment; drilling for, installing, and trimming micropile foundations; perforating and drilling pole holes; digging anchor excavations; installing grounding rods and wire; removing spoils; and conducting helicopter external load operations. Along C 440, CPUC ECMs observed construction crews installing erosion control BMPs, trimming trees, removing and chipping vegetation, digging and drilling pole and anchor excavations, trenching for grounding rods and wire, setting poles, stripping pavement, breaking rock, trenching for underground distribution line, installing conduit and adding slurry, trench patching, drilling bollard excavations, exporting spoils, conducting hot work, and cleaning up sites. Along C 79A, CPUC ECMs observed construction crews dewatering and excavating around vaults and framing poles.

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 (see Photo 1 – Attachment A), 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 (see Photo 2 – 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. 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 also observed salvaged topsoil for use in restoration activities in accordance with the Habitat Restoration Plan and MM-BIO-4 (see Photo 3 – Attachment A). Biological Monitors were present to monitor bird nests during construction activities and ensure helicopter pilots respected helicopter bird nest buffers along TL 625C and TL 6923, 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 (see Photo 4 – Attachment A). During this reporting period, a CPUC ECM communicated with the Cultural monitoring team to ensure they were aware of a crew using shovels to level the ground for outriggers at a site on TL 625C that was recommended for Cultural Monitoring in the HPMP. 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. During this reporting period, a CPUC ECM observed a crew on TL 6923 that did not have a full set of tools within the required 50 feet and communicated with the crew, who stopped work immediately to retrieve the tools. Fire boxes were observed at staging yards and stocked with the required firefighting tools. Fire patrols were observed monitoring hot work and construction activities (see Photo 5 – Attachment A), 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. BMPs included the use of gravel bag check dams, gravel bag berms, perimeter fiber rolls or straw wattles, silt fence, plywood, and track out controls such as rattle plates and rock aprons at points of ingress and egress with staging yards (see Photo 6 – Attachment A). 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, 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 February 11, a crew drove a bucket truck outside the approved work limits on the access road between Poles Z272947 and Z272948 on TL 625C. The truck impacted an area of pastureland that was approximately six feet by 35 feet. This incident violated MM BIO-1 and resulted in a Level 1 Minor Deviation. Work limits were discussed in the field and at the tailboard meeting.

SDG&E reported that on February 15, tire tracks from a project bucket truck were observed outside the work limits of the access road between Poles Z272947 and Z272948 on TL 625C. One tire track impacted an area of pastureland that was approximately six feet by 15 feet. A second tire track impacted an area of pastureland that was approximately 12 feet by 20 feet. This incident violated MM BIO-1 and resulted in a Level 1 Minor Deviation. Additional signage and staking was placed, and work limits were discussed in the field and at the tailboard meeting.

SDG&E reported that on February 20, crews installed new steel poles at Poles Z46606 and Z46627 at the Cameron Substation on TL 6923. Because the new poles were taller than the old ones, the crew had to replace the conductors between the poles and the substation. Getting all of the conductors in place and

secured took longer than anticipated, and work ran beyond the permitted work hours. Work concluded at 7:00 p.m. and crews departed at 7:45 p.m. This incident violated MM NOI-4 and resulted in a Level 1 Minor Deviation. At the morning tailboard, the importance of being in compliance with noise ordinances and associated MMs was relayed to all crews.

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, tested, and capped micropile foundations; drilled and excavated for, installed, and topped poles; poured concrete; conducted overhead and wire stringing operations; removed poles and spoils; conducted backfill operations; and repaired fencing. The estimated completion date is July 2020. Approximately 72% complete.

TL 625C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; assembled, installed, and topped poles; and conducted overhead and wire stringing operations. The estimated completion date is May 2020. Approximately 81% complete.

TL 6923

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; drilled and perforated for, installed, capped, tested, and grouted micropile foundations; drilled and excavated for pole and anchor holes; assembled, installed, and topped poles; excavated for and installed grounding rods and anchors; conducted overhead work; and removed spoils. The estimated completion date is October 2020. Approximately 35% complete.

C 440 Phase I

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; removed and chipped vegetation; trimmed trees; excavated for pole holes; drilled for micropile foundations; assembled and installed poles; excavated for and installed conduit, bollards, and anchors; slurried in the conduit package; mandrelled the installed conduit; conducted overhead and wire

stringing operations; stipped and finished vaults; and paved and installed road plates. The estimated completion date is August 2020. Approximately 76% complete.

C 79A

During this reporting period, construction crews installed, inspected, and maintained sediment control BMPs; removed snow; drilled for, assembled, and installed poles; drilled and excavated for and installed grounding rods, conduit, vaults, anchors, and ductbanks; raised vault lids; poured concrete; and conducted backfill and compaction operations. The estimated completion date is May 2020. Approximately 65% complete.

ATTACHMENT A Photos



Photo 1: A crew member was observed wetting down the work area at Pole Z972788 (TL 6923) prior to helicopter external load operations to minimize dust emissions in accordance with APM AIR-02 and APM AIR-05.

ATTACHMENT A (Continued)



Photo 2: Crews remained within the designated construction only access route limits on the way to pole P258409, in accordance with MM-BIO-1.

ATTACHMENT A (Continued)



Photo 3: Salvaged topsoil was set aside after crane pad grading at pole Z774861. The topsoil will be used for restoration in accordance with the Habitat Restoration Plan and MM-BIO-4.

ATTACHMENT A (Continued)



Photo 4: During pole hole drilling at along C 440, Archaeological and Cultural Monitors were observed monitoring the activity in accordance with APM CUL-04 and MM CUL-1 and inspecting excavated spoils for cultural resources in accordance with Appendix A of the HPMP.

ATTACHMENT A (Continued)



Photo 5: During vegetation chipping on Sunrise Highway (C 440), a full set of fire tools was staged within 50 feet of the activity and a Fire Patrol was equipped with at least 100 gallons of water with pump and hose in accordance with the CFPPP specifications for chipping on CNF land with a PAL C.

ATTACHMENT A (Continued)



Photo 6: Rattle plates were observed at the point of ingress/egress to the Right of Way off Round Potrero Road (TL 6923) in accordance with the ECP and SWPPP.

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
CPUC-025	February 4, 2020	Remove TL 626 from service and convert the northern section of TL 626 from 69 kV to 12 kV	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
043	12/27/19	Replacement pole location adjustment and addition of temporary workspace at Pole Z272939	Approved	1/9/20
044	2/10/20	Refinements to TL 626 Conversion South	Pending	