

	<p><b>California Public Utilities Commission</b>  <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p>
	<p><b>Cleveland National Forest Power Line Replacement Projects</b></p> <p><b>Compliance Status Report: 092</b></p> <p><b>April 5, 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 March 23 through April 5, 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 Line (TL) 6923, TL 625C, TL 626 Conversion North (Circuit 222), Circuit (C) 440, 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 6923, CPUC ECMs observed crews conducting overhead work, micropile drilling, helicopter activities, and equipment staging at the Sol Valley Staging Yards. Along TL 625C, CPUC ECMs observed crews conducting overhead work, setting new steel poles, helicopter external load operations, and road maintenance at the entrance to Bookout Staging Yard. Along TL 626 Conversion North (C 222), CPUC ECMs observed crews trenching, digging for direct-bury pole holes, vegetation removal and trimming trees. Along C 79A, CPUC ECMs observed crews setting asphalt at vaults, trenching, and installing conduit. Along C 440 Phase I, CPUC ECMs observed crews trenching, excavating for bollards, slurring in conduit packages, digging for direct-bury pole holds, conducting external load operations and conducting erosion control Best Management Practices (BMPs) maintenance.

To prevent fugitive dust emissions during project activities, crews were observed applying water to prevent fugitive dust 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 were observed applying water during drilling and using 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 1 – Attachment A). 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. In accordance with MM BIO-14 and MM BIO-16, Environmentally Sensitive Area (ESA) signs and flagging were observed installed around areas with special-status species, and ESAs were observed being avoided by crews (see Photo 2 – Attachment A). 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. Avian biologists were observed conducting nesting bird surveys and were present to monitor bird nests during construction activities in accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) and MM BIO-28. Bat buffers were observed being implemented in accordance with MM BIO-30 (see Photo 3 – 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. 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 (see Photo 4 – Attachment A).

In accordance with the Construction Fire Prevention/Protection Plan (CFPPP) (MM FF-1), San Diego Gas & Electric (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 (see Photo 5 – Attachment A). Fire boxes were observed at staging yards and stocked with the required firefighting tools.

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 refueling, 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 BMPs were observed being implemented and maintained along project alignments in accordance with the project Erosion Control Plan (ECP), Stormwater Pollution Prevention Plan (SWPPP; MM HYD-01, MM BIO-7), and APM HYD-09. Hydrological resources were flagged for avoidance, and work activities occurred outside of hydrological resources in accordance with APM HYD-06 (see Photo 6 – Attachment A).

Traffic control measures were observed being implemented in accordance with APM TRANS-01 through APM TRANS-05 during this reporting period.

### ***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***

One Level 1 Minor Deviation occurred during this reporting period.

SDG&E reported that on March 23, a project vehicle was observed beyond the approved work limits along Sheephead Mountain Road near Station Number 25+00 on Phase I of C 440. The incident was a violation of MM BIO-1 (work limits) and resulted in a Level 1 Minor Deviation. Approximately 100 square feet of non-native grassland was impacted per SDG&E, and an archaeological monitor and Native American monitor surveyed the area for cultural resources on March 24. No sensitive resources were observed. Per SDG&E, additional signage and staking were installed, and staying within the work limits was discussed in the field and at the tailboard meeting.

### **CONSTRUCTION SCHEDULE AND PROGRESS**

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 inspected and maintained sediment and erosion control BMPs and installed fencing. The estimated completion date is July 2020. Approximately 76% complete.

#### TL 625C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, installed and topped poles, installed grounding rods, conducted backfill operations, and conducted overhead and wire-stringing operations. The estimated completion date is May 2020. Approximately 93% complete.

#### TL 6923

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; drilled for, perforated, installed, capped, tested, and grouted micropile foundations; drilled, excavated for, and installed poles; excavated for and installed grounding rods; poured concrete; removed spoils; and conducted compaction and backfill operations. The estimated completion date is August 2020. Approximately 52% complete.

#### TL 626 Conversion North (C 222)

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; cleared, chipped, and removed vegetation; and trimmed trees. The estimated completion date is September 2020. Approximately 6% complete.

#### TL 626 RFS

No work was conducted this reporting period. The estimated completion date is October 2020.

#### C 440 Phase I

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; drilled and excavated for and installed conduit, poles anchor, grounding rods, and bollards; slurried in conduit package; mandrelled the installed conduit; conducted plate maintenance; conducted backfill operations; paved; and conducted overhead and wire-stringing activities. The estimated completion date is August 2020. Approximately 84% complete.

#### C 79A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; removed snow; mandrelled; excavated for, maintained, painted, and proofed vaults; excavated for and installed vaults and conduit; conducted compaction and backfill operations; and conducted wire-stringing operations. The estimated completion date is June 2020. Approximately 79% complete.

## ATTACHMENT A

### Photos

---



**Photo 1:** A crew was observed using helicopter external load operations to set P258404 (C 440 Phase I). The associated line truck was observed on the approved access road in accordance with MM BIO-1.

## ATTACHMENT A (Continued)



**Photo 2:** Vegetation clearing crews at P259357 (TL 626 Conversion North/C 222) were observed avoiding Engelmann oak within the work space in accordance with MM BIO-13 and MM BIO-14, and a biological monitor was observed on site during vegetation clearing in accordance with MM BIO-3.

## ATTACHMENT A (Continued)



**Photo 3:** A bat avoidance buffer was implemented by the project's bat biologist between P259332 and P259333 (TL 626 Conversion North/C 222) in accordance with MM BIO-30.



## ATTACHMENT A (Continued)



**Photo 4:** ESA signs were observed posted along an access road along TL 6923 to ensure protection of cultural resources in accordance with APM CUL-09 and the HPMP (MM CUL-1).

## ATTACHMENT A (Continued)



**Photo 5:** During excavation along C 440 Phase I, a complete set of fire tools per the CFPPP (MM FF-1) was observed on site.

## ATTACHMENT A (Continued)



**Photo 6:** A hydrological resource within Sol Valley Staging Yard South (TL 6923) was flagged and roped off to prevent impacts in accordance with APM HYD-06.

## 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

## ATTACHMENT B

### Notices to Proceed

---

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

## ATTACHMENT C

### Minor Project Refinement Request

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
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

**ATTACHMENT C**  
**Minor Project Refinement Request**

---

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	
045	2/21/20	Temporary shoo-fly along TL629A	Approved	3/9/20
046	3/6/20	Additional anchor locations and access road modifications along C 440 Phase I.	Approved	3/26/20