

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 103 September 6, 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 August 24 through September 6, 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) 626 Conversion South (Circuit (C) 79B) and C 440, 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 626 Conversion South (C 79B), CPUC ECMs observed crews trimming trees, digging pole and anchor excavations, installing anchors, framing and setting poles, installing grounding rods, and removing pole butts. Along C 440, CPUC ECMs observed crews removing and chipping vegetation, installing erosion control BMPs, trimming trees, setting up equipment, potholing for underground utilities, drilling and digging pole and anchor excavations, installing anchors, spreading and transferring conductor, setting poles, removing old poles, installing grounding rods, pulling underground cable, using helicopter external load operations to support construction activities, pouring concrete (see Photo 2 – Attachment A), conducting overhead and transformer work, grinding pavement, excavating trenches, slurring in the conduit package, and adjusting castings in preparation for concrete pouring.

To prevent fugitive dust emissions during project activities, crews were observed applying water along unpaved access roads and in work areas in accordance with APM AIR-02 and during helicopter operations in accordance with the Aviation Safety Plan (MM PHS-5) (see Photo 1 – Attachment A). 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.

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. 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 installed around areas with special-status species, and ESAs were observed being avoided by crews. 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.

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. Additionally, a Paleontological Monitor was observed

monitoring excavations at locations with underlying sensitive geologic deposits in accordance with APM CUL-08 (see Photo 3 – 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 and other tools as required by the CFPPP (see Photo 4 – Attachment A), and appropriate Fire Patrols were observed on site during activities that required their presence. 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 and beneath equipment during mechanical work and refueling (see Photo 5 – Attachment A), staging spill kits at work sites, using double-walled fuel tanks or implementing secondary containment beneath staged fuel tanks, 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-1 and MM BIO-7), and APM HYD-09 (see Photo 6 – Attachment A). Other BMPs in the SWPPP, such as hydromulch application, concrete waste containment, and street sweeping, were also observed along the alignments. Hydrological resources were flagged for avoidance, and work activities occurred outside of hydrological resources in accordance with APM HYD-06.

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 MMCRP.

Compliance Status

One Level 3 Non-Compliance occurred during this reporting period.

SDG&E reported that on September 3, archaeological monitors observed that a line crew had removed three T-posts delineating an access road on Phase II of C 440 in order to navigate around a black oak (*Quercus kelloggii*). The archaeological monitor told the foreman that crews cannot move ESA delineations and spotters should be used when maneuvering around ESAs. The foreman informed the archaeological monitors that the T-posts would be returned to their original positions. No impacts to cultural resources were observed at this ESA location.

SDG&E reported that on the morning of September 4, archaeological monitors accompanying a tree trimming crew to a pole on Phase II of C 440 observed that the ESA delineation within a Turnaround (TA) and pole workspace had been moved 30 to 40 feet by a line crew. Based on the tire tracks present within the cultural resource boundary, it appeared that line and bucket trucks had used the area to turn around and surface resources were driven over multiple times. Artifacts were present within the disturbed portion of the site where tire tracks were observed. The soils and the artifacts within the ESA were impacted, but only minor impacts to the resources were observed. The line crew indicated that only T-posts were present at the TA and no ESA signage was present, which led to confusion regarding constraints at this location.

In addition to impacts to cultural resources, several small black oaks in the area suffered damage from the line and bucket trucks. A tree trimming crew trimmed trees to remedy this issue. These incidents were in violation of MM CUL-3 and Section 3.1.3.4 of the HPMP, resulting in a Level 3 Non Compliance due to deficient ESA signage and impacts to cultural resources at one location and repeated removal of ESA delineations that introduced the threat of damage to cultural resources. At the tailboard meeting, crews were reminded not to remove or reposition ESA boundaries. On September 8, a stand-down with the crew and a meeting between SDG&E project management personnel, SDG&E environmental compliance personnel, and the crew's general foreman and foreman occurred; discussion topics included ESA boundaries and cultural resource protection requirements for the Project. Additional signage was installed at the affected locations on September 4. Non-confidential ESA mapping will be provided to line crews as an additional corrective action to ensure awareness of all sensitive locations.

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 6957, TL 629C, TL 625B, TL 625C, and TL 6958

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

TL 682

During this reporting period, construction crews conducted punch-list closeout work. The estimated completion date is September 2020. Approximately 99% complete.

TL 6957

During this reporting period, construction crews conducted punch-list closeout work. The estimated completion date is September 2020. Approximately 99% complete.

TL 629A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, installed and pulled cable, removed spoils, and conducted punch-list closeout work. The estimated completion date is September 2020. Approximately 97% complete.

TL 6923

During this reporting period, construction crews conducted punch-list closeout work. The estimated completion date is October 2020. Approximately 99% complete.

TL 626 Conversion North (C 222)

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs and conducted punch-list closeout work. The estimated completion date is September 2020. Approximately 98% complete.

TL 626 RFS

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, removed poles, and conducted backfill operations. The estimated completion date is December 2020. Approximately 47% complete.

TL 626 Conversion South (C 79B)

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; removed vegetation; excavated for, installed, removed, and topped poles; excavated for and installed anchors; installed grounding rods; conducted wire-stringing operations; and conducted pole maintenance. The estimated completion date is December 2020. Approximately 37% complete.

C 440 Phase I

During this reporting period, construction crews conducted punch-list closeout work. The estimated completion date is September 2020. Approximately 98% complete.

C 440 Phase II

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; installed signage; trimmed trees; removed and chipped vegetation; spread mulch; drilled and excavated for, removed, and installed poles; excavated anchor holes; installed grounding rods; conducted wire-stringing operations; constructed retaining walls; potholed; performed vault maintenance; excavated for, mandrelled, and installed conduit; ground asphalt; poured concrete; and paved. The estimated completion date is December 2020. Approximately 20% complete.

C 79A

During this reporting period, construction crews conducted punch-list closeout work. The estimated completion date is September 2020. Approximately 99% complete.

ATTACHMENT A Photos



Photo 1: A water tender was observed applying water to the surface at Morris Ranch Staging Yard (C 440) before and during helicopter activities to minimize dust emissions from rotor wash in accordance with APM AIR-02 and the Aviation Safety Plan (MM PHS-5).

ATTACHMENT A (Continued)



Photo 2: A crew was observed pouring concrete at Pole P45113 (C 440). A Biological Monitor was observed monitoring construction activities along the alignment to ensure compliance with mitigation measures, applicant proposed measures, and permit conditions in accordance with MM BIO-22.

ATTACHMENT A (Continued)



Photo 3: In accordance with APM CUL-08, a Paleontological Monitor was observed monitoring excavations at locations with underlying Potential Fossil Yield Classification Class 3 geologic deposits where new poles were unable to be installed in the same location as the existing poles along C 440.

ATTACHMENT A (Continued)



Photo 4: During vegetation chipping at Pole P260427 (C 440), a full set of fire tools was observed within 50 feet of the activity, at least 100 gallons of water with pump and hose were observed on site, and a crew member was observed wetting down the area in accordance with the CFPPP Fire Prevention Matrix for chipping on USFS land with a PAL C.

ATTACHMENT A (Continued)



Photo 5: A drip pan was used during truck refueling along C 79B to prevent leaks and spills from being discharged into the soil in accordance with MM PHS-2 and the SRNP.

ATTACHMENT A (Continued)



Photo 6: A crew was observed digging a direct bury pole hole and digging an anchor excavation at Pole P40245 (C 440). Site-specific erosion control BMPs were observed in good condition in accordance with the ECP, SWPPP (MM HYD-1 and MM BIO-7), and APM HYD-09.

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
CPUC-026	April 23, 2020	Convert the southern portion of TL 626 from a 69 kV transmission line to 12 kV distribution line from Johnson Creek (Pole P258599) to the Descanso Substation	Y
CPUC-027	June 5, 2020	Reconstruct Phase II of the C 440 Component	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
044	2/10/20	Refinements to TL 626 Conversion South	Approved	4/23/20
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