

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> Program
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 106 October 18, 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 October 5 through October 18, 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 digging and drilling direct buy pole holes, digging anchor excavations, conducting overhead work associated with wire stringing, and using helicopter external load operations to mobilize equipment to sites and set poles. Along C 440, CPUC ECMs observed crews removing and chipping vegetation; installing erosion control Best Management Practices (BMPs); trimming trees; drilling and digging direct bury pole holes; excavating for, installing, and testing anchors; installing grounding rods; covering pole holes; framing and setting poles; installing cross arms; installing guy wire; covering, spreading, transferring, stringing, and replacing conductor; removing poles and pole butts; excavating trenches for underground conduit; pulling underground cable; tying in conduit; conducting backfill operations; removing native backfill; and conducting cleanup activities.

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 (see Photo 1 – Attachment A) and during helicopter operations in accordance with the Aviation Safety Plan (MM PHS-5). 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 (see Photo 2 – 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, 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. 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. During this reporting period, a CPUC ECM worked with an on-site Biological Monitor to ensure that partially uncovered pole holes and anchor excavations were addressed in a timely manner.

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 3 – Attachment A). 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), 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 equipped with a full 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 implementing other fire prevention measures as required by the CFPPP, and appropriate Fire Patrols were observed on site during activities that required their presence (see Photo 4 – 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 (see Photo 5 – Attachment A) and 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, 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 1 Minor Deviation occurred during this reporting period.

On October 5, a CPUC ECM observed a two-person crew conducting site cleanup activities with shovels near Pole P45859 on Phase II of C 440. A set of fire tools was not observed within 50 feet of the activity,

which is a requirement of the CFPPP for general construction activities with hand tools on United States Forest Service land with a Project Activity Level of D. The fire tools were located approximately 130 feet from the crew's work activities. The CPUC ECM asked the crew if they had fire tools and the crew relocated the fire tools to within 50 feet of work activities before continuing work. No other issues were noted. This incident was a violation of MM FF-1 and the CFPPP and resulted in a Level 1 Minor Deviation. The following corrective actions are being implemented by the contractor:

- All foremen will assign one person from each crew to ensure fire tools are within the defined work limits and within 50 feet of the work. This person will be identified each morning at the tailboard meeting.
- The contractor will continue to have daily discussions with crews about fire tool compliance.

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, TL 626RFS, TL 682, and TL 6958

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

TL 629A

During this reporting period, construction crews conducted punch-list closeout work. The estimated completion date is November 2020. Approximately 99% 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 conducted cleanup activities and punch-list closeout work. The estimated completion date is November 2020. Approximately 98% complete.

TL 626 Conversion South (C 79B)

During this reporting period, construction crews inspected and maintained erosion control BMPs; removed vegetation; excavated and drilled for, installed, removed, and topped poles; excavated for and installed

anchors; performed conductor work; and conducted wire stringing operations. The estimated completion date is December 2020. Approximately 59% complete.

C 440 Phase I

During this reporting period, construction crews conducted cleanup activities and punch-list closeout work. The estimated completion date is November 2020. Approximately 99% 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 vegetation; excavated and drilled for, removed, and installed poles; excavated and drilled for, installed, and tested anchors; performed conductor work; conducted wire stringing activities; excavated for, mandrelled, and installed conduit and vaults; poured concrete; and conducted backfill and compaction operations. The estimated completion date is December 2020. Approximately 38% complete.

C 79A

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

ATTACHMENT A Photos



Photo 1: A water tender was observed applying water on Morris Ranch Road (C 440) to minimize dust emissions from Project vehicular traffic in accordance with APM AIR-02.

ATTACHMENT A (Continued)



Photo 2: A crew was observed digging a direct bury pole hole at Pole P258496 (C 79B) within clearly delineated work limits in accordance with MM BIO-1.

ATTACHMENT A (Continued)



Photo 3: Archaeological and Cultural Monitors were observed monitoring pole hole digging at a site on C 440 in accordance with the HPMP, APM CUL-04, MM CUL-1, and MM CUL-3.

ATTACHMENT A (Continued)



Photo 4: During overhead line work associated with wire stringing at Pole P258564 (C 79B), a Designated Fire Patrol was present and equipped with at least 150 gallons of water with pump and hose in accordance with the CFPPP Fire Prevention Matrix for conductor work with de-energized lines on USFS land with a PAL D.

ATTACHMENT A (Continued)



Photo 5: A drip pan was observed under a staged project vehicle at Pole P258472 (C 79B) to prevent leaks or spills from being discharged onto the ground in accordance with MM PHS-2.

ATTACHMENT A (Continued)



Photo 6: During anchor excavation at Pole P40392 (C 440), site-specific erosion control BMPs were observed in good condition in accordance with the ECP and SWPPP (MM HYD-1) 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
047	4/9/20	Shift Pole P259353, P259354, P259355, addition of anchors and temporary work areas, and addition of construction-only access road between Boulder Creek Road and the Boulder Creek Fly Yard.	Approved	4/22/20
049	9/2/20	Remove 43 trees along C 440	Approved	10/9/20