

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i>
	Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 108 November 15, 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 November 2 through November 15, 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 removing vegetation, digging direct bury pole holes and anchor excavations, excavating for intercepts, installing grounding rods, removing pole butts, dewatering, framing poles, conducting access road maintenance, stringing conductor, and conducting overhead work. Along C 440, CPUC ECMs observed crews removing snow, removing and maintaining erosion control BMPs, trimming and topping trees, chipping, digging and drilling pole holes and anchor excavations, placing gravel in pole holes, covering pole holes, setting poles and backfilling, conducting overhead work, converting overhead conductor to underground, conducting electrical work, installing bollards, and striping the road.

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). 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 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, 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 project-related food trash was 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 2 – 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 3 – 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 4 – 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 5 – Attachment A). Other BMPs in the SWPPP, such as hydromulch application, concrete waste containment, street sweeping, and access road entrance stabilization 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. During this reporting period, a CPUC ECM worked with a Biological Monitor to ensure that a damaged spoils stockpile cover on C 440 was repaired in a timely manner.

Traffic control measures were observed being implemented in accordance with APM TRANS-01 through APM TRANS-05 during this reporting period (see Photo 6 – Attachment A).

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

Three Level 1 Minor Deviations occurred during this reporting period.

SDG&E reported that on November 9, a crew at Pole P130614 on C 79B used a chain saw to cut vegetation and tree branches without a Biological Monitor present. The crew cut portions of a California lilac

(*Ceanothus* sp.) and Scrub oak (*Quercus berberidifolia*) to clear a path for pole-setting operations. The vegetation cleared was within the work limits. The incident was a violation of MM BIO-3 and resulted in a Level 1 Minor Deviation. Per SDG&E, the crew was told that vegetation clearing and tree cutting must be discussed with a Biological Monitor before taking place; they were also told that cuts to vegetation and trees must be clean and organized. Crews were reminded at the tailboard meeting to consult Biological Monitors before clearing vegetation.

SDG&E reported that on November 13, empty water bottles associated with various Project personnel were observed scattered along Boulder Creek Road on C 79B. The loose trash was collected. The incident was a violation of MM BIO-26 and resulted in a Level 1 Minor Deviation. Crews were reminded at the tailboard meeting to collect their debris each day.

SDG&E reported that on November 14, a temporary spoils stockpile was observed beyond the work area at Pole P258491 on C 79B. The impacted area was approximately 50 square feet and impacted chamise (*Adenostoma fasciculatum*), California buckwheat (*Eriogonum fasciculatum*), and white sage (*Salvia apiana*). The incident was a violation of MM BIO-1 and resulted in a Level 1 Minor Deviation. Crews were reminded at the tailboard meeting to keep spoils stockpiles inside the work areas.

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 629C, TL 625B, TL 625C, TL 626RFS, 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 December 2020. Approximately 99% complete.

TL 6923

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

TL 626 Conversion North (C 222)

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

TL 626 Conversion South (C 79B)

During this reporting period, construction crews inspected and maintained erosion control BMPs; removed vegetation; excavated for, assembled, installed, and removed poles; excavated and drilled for, tested, and installed anchors; installed grounding rods; removed spoils; conducted wire stringing activities; maintained access roads; and conducted cleanup activities. The estimated completion date is December 2020. Approximately 80% 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 and removed trees; excavated and drilled for, installed, and removed poles; excavated and drilled for and installed anchors; performed conductor work; conducted wire stringing activities; potholed; excavated for and installed bollards and grounding rods; excavated for, installed, and mandrelled conduit; excavated for and installed vaults; excavated for, installed, and maintained electrical boxes; excavated for and constructed a retaining wall; poured concrete; conducted backfill operations; paved; maintained access roads; and removed snow. The estimated completion date is December 2020. Approximately 57% complete.

C 79A

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

ATTACHMENT A Photos



Photo 1: During pole and anchor excavation at Pole P40478 (C 440), crews were observed remaining within clearly delineated work limits in accordance with MM BIO-1.

ATTACHMENT A (Continued)



Photo 2: Archaeological and Cultural Monitors were observed monitoring pole hole excavation at a site on C 440 in accordance with the HPMP, MM CUL-1, MM CUL-3, and APM CUL-04.

ATTACHMENT A (Continued)



Photo 3: A Designated Fire Patrol was present during overhead work at Pole P258558 (C 79B) in accordance with the CFPPP for conductor work with energized lines off NFS land with a Normal FPI.

ATTACHMENT A (Continued)



Photo 4: Drip pans were observed under staged equipment at Shrine Camp Staging Yard (C 440) to prevent leaks or spills from being discharged onto the ground in accordance with the SRNP and MM PHS-2.

ATTACHMENT A (Continued)



Photo 5: A crew was observed drilling a pole hole at Pole P40470 (C 440). An anchor excavation at the site was observed to be covered to prevent wildlife entrapment in accordance with MM BIO-23, and the associated spoils stockpile was observed to be covered in accordance with the ECP, SWPPP, and APM HYD-09.

ATTACHMENT A (Continued)



Photo 6: Cones, signage, and flagpersons were used to direct one-way traffic on Boulder Creek Road during construction activities at Pole P258511 (C 79B) in accordance with 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 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	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	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
048	8/25/20	Shift Pole P259378 and add a temporary work area along TL 626 Conversion North	Approved	10/21/20
049	9/2/20	Remove 43 trees along C 440	Approved	10/9/20
050	10/21/20	Modify components of TL 626 Conversion South/ C79B	Approved	11/2/20