

	<b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting</i></b> <b><i>Program</i></b>
	<b>Cleveland National Forest Power Line Replacement</b> <b>Projects</b>  <b>Compliance Status Report: 109</b>  <b>November 29, 2020</b>

## 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 16 through November 29, 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) 629A, 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 pole butts and pole tops, conducting hot work, and conducting overhead work associated with wire stringing. Along TL 629A, CPUC ECMs observed crews conducting cleanup activities and installing jute netting. Along C 440, CPUC ECMs observed crews installing, inspecting, and maintaining erosion control BMPs; trimming trees and chipping; digging and drilling pole and anchor excavations; testing anchors; felling, cutting, and removing an old pole; framing, setting, and topping poles; letting down wire; conducting wire stringing operations; replacing conductor; potholing; excavating trenches; installing intercepts; hauling and removing spoils; removing asphalt; setting and wiring electrical boxes; pulling underground cable; and conducting access road maintenance.

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 (see Photo 2 – Attachment A), and crews were observed containing trash at work areas in accordance with MM BIO-26. Habitat restoration activities were observed to be conducted in accordance with MM BIO-4 and the Habitat Restoration Plan (HRP) (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 (see Photo 4 – 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 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 (see Photo 6 – 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 2 – 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.

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***

Five Level 1 Minor Deviations occurred during this reporting period.

SDG&E reported that on November 18, monitors observed that rope and staking had been knocked down at the cultural area at Pole P258482 on TL 626 Conversion South (C 79B); there were also tire tracks

outside the roped area. No cultural or biological impacts were observed by SDG&E. 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 properly delineate and remain inside the approved work areas.

SDG&E reported that on November 18, two crew bucket trucks parked in an unauthorized area across from Pole P775459 on TL 626 Conversion South (C 79B). The area was dominated by black mustard (*Brassica nigra*) and native and non-native grasses. The crews moved the vehicles after being informed that they were parked in an unapproved area and were creating a fire hazard. The impacted area was approximately 40 feet by 50 feet. No cultural impacts were observed by SDG&E. 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 remain inside the approved work areas.

SDG&E reported that on November 18, a monitor observed tire tracks and crushed vegetation at the site entrance to Pole P258530 on TL 626 Conversion South (C 79B). Approximately three feet of vegetation on each side of the site entrance was impacted. The impacted vegetation consisted of California lilac (*Ceanothus* sp.), scrub oak (*Quercus berberidifolia*), and California buckwheat (*Eriogonum fasciculatum*). No cultural impacts were observed by SDG&E. 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 remain inside the approved work areas.

SDG&E reported that on November 19, a crew drove a bucket truck down an access footpath on Phase II of C 440. The area of impact was approximately 180 feet long and nine feet wide. The crew was stopped by a Cultural Monitor and backed out of the area. The Cultural Monitor stated that the footpath access sign had been knocked over prior to the arrival of the crew. A non-Project-related back hoe was also parked inside this area, and tire tracks from that piece of equipment were observed. Native and non-native grasses were impacted. No cultural impacts were observed by SDG&E. The incident was a violation of MM BIO-1 and resulted in a Level 1 Minor Deviation. A new footpath sign was installed with a T-post to ensure that it will not fall over again. Crews were reminded at the tailboard meeting to properly delineate and remain inside the approved work areas.

SDG&E reported that on November 19, tire tracks from a Project-related bucket truck were observed outside of the Pole P260425 access road on Phase II of C 440. The area of impact was approximately 19.5 feet long and seven feet wide. Native and non-native grasses were impacted. The incident was a violation of MM BIO-1 and resulted in a Level 1 Minor Deviation. T-posts and yellow rope were installed in this area to prevent future impacts and crews were reminded at the tailboard meeting to remain inside the approved 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 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, removed poles, trimmed trees, hydroseeded, and maintained access roads. 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 December 2020. Approximately 99% complete.

TL 626 Conversion North (C 222)

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

TL 626 Conversion South (C 79B)

During this reporting period, construction crews inspected and maintained erosion control BMPs; removed spoils; excavated for, installed, topped, and removed poles; installed anchors; conducted backfill operations; and conducted wire stringing activities. The estimated completion date is December 2020. Approximately 88% complete.

C 440 Phase I

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

C 440 Phase II

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; installed signage; trimmed, chipped, and removed trees; excavated and drilled for, assembled, installed, topped, and removed poles; excavated anchor holes; installed grounding rods and locator balls; performed conductor work; conducted wire stringing operations; excavated for and installed conduit; excavated for, grouted, and constructed a retaining wall; excavated for and installed bollards; poured concrete; conducted backfill and compaction operations; ground asphalt; paved; removed spoils; and maintained access roads. The estimated completion date is December 2020. Approximately 69% complete.

C 79A

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

## ATTACHMENT A Photos

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**Photo 1:** During pole hole digging at Pole P40352 (C 440), crew members and equipment were observed within clearly delineated work limits in accordance with MM BIO-1.

## ATTACHMENT A (Continued)



**Photo 2:** During anchor excavation at Pole P40354 (C 440), the pole hole was observed to be securely covered to prevent wildlife entrapment in accordance with MM BIO-23. Additionally, the associated spoils stockpile was observed to be covered in accordance with the ECP, the SWPPP, and APM HYD-09.



## ATTACHMENT A (Continued)



**Photo 3:** A crew was observed installing jute netting at Pole Z40256 (TL 629A) as part of habitat restoration activities in accordance with MM BIO-4 and the HRP.

## ATTACHMENT A (Continued)



**Photo 4:** Archaeological and Cultural Monitors were observed monitoring pole butt removal on C 440 in accordance with the HPMP, MM CUL-1, MM CUL-3, and APM CUL-04.

## ATTACHMENT A (Continued)



**Photo 5:** A Dedicated Fire Patrol was observed wetting the area prior to steel pole cutting at Pole P258494 (C 79B) in accordance with the CFPPP for hot work on NFS land with a PAL C.

## ATTACHMENT A (Continued)



**Photo 6:** During pole butt removal at Pole P258545 (C 79B), a chain saw was observed to be staged in a drip pan to prevent leaks or spills from being discharged onto the ground in accordance with MM PHS-2 and the SRNP.

## 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

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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