	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 070** **June 2, 2019**

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 May 20, 2019 through June 2, 2019.

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 Lines (TL) 629A, TL 6958, TL 682, 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 629A, CPUC ECMs observed construction crews readying work spaces for drilling. This included trimming trees for line and pole clearance, clearing ground vegetation, potholing, setting up drill platforms, spreading wire for drill space, and installing Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) at various pole locations (see Photos 1 through 4 – Attachment A). Additionally, crews were observed conducting trenching for the installation of ground rods and micropile foundation drilling at pole sites. Along TL 6958, construction crews were observed performing overhead work at various pole sites, which included spotting poles, conducting cutover prep work, and repairing an insulator. Along TL 682, ECMs observed crews removing temporary disconnects at several poles, conducting punch-list work, and fixing insulators (see Photo 5 – Attachment A).

To prevent fugitive dust emissions during project activities in accordance with APM AIR-05, a crew was observed using a containment box to trap drill cutting from micropile drilling along TL 629A (see Photo 2 – Attachment A). Additionally, project personnel were observed maintaining the posted speed limit of 15 miles per hour on unpaved 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 5 – Attachment A). Biological monitors were observed monitoring work sites when initial ground-disturbing or vegetation-removal activities were taking place in accordance with MM BIO-3 and MM BIO-22. During construction and overhead activities along TL 629A, previously-installed arroyo toad (*Anaxyrus californicus*) exclusionary fencing (APM BIO-03) was observed intact (see Photo 1 – Attachment A) and Environmentally Sensitive Area (ESA) signage and flagging per MM BIO-14 and MM BIO-16 were observed in place and ESAs were observed being avoided. To prevent wildlife entrapment, trenches and excavations were observed securely covered or backfilled in accordance with MM BIO-23 along TL 6958 and TL 629A (see Photo 4 – Attachment A). A crew was observed containing food-related trash in secured trash bags and cans in work spaces along TL 629A while performing micropile drilling in accordance with MM BIO-26. Approved avian biologists were observed conducting pre-construction sweeps and monitoring active nests prior to vegetation removal and tree trimming activities along TL 629A and prior to overhead work along TL 6958 in accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) and MM BIO-28 (see Photo 6 – Attachment A).

Cultural resource monitors, including archaeological and Native American monitors, were observed monitoring excavations and occurring within the vicinity of known cultural resources and examining excavated soils along TL 629A 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 resource ESA fencing was observed to be in place to prevent unauthorized access/construction activities in areas containing known cultural resources per the HPMP.

In accordance with the Construction Fire Protection/Prevention Plan (CFPPP) (MM FF-1), all project-related vehicles and equipment were observed carrying the required set of fire tools (including a 5 gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) and these tools were observed within 50 feet of work activities (see Photo 3 – Attachment A).

To prevent leaks and spills from being discharged into the soil, construction crews were observed implementing spill prevention BMPs in accordance with the Spill Response and Notification Plan (SRNP) and MM PHS-2. During drilling activity along TL 629A, double-walled cells were observed being utilized when storing fuel on site to ensure containment (see Photo 2 – Attachment A). Additionally, during pressure grouting along TL 629A, visqueen was observed beneath grout holding tanks to collect potential leaks and spills in accordance with the SRNP and APM HYD-01.

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) and SWPPP (MM HYD-1, MM BIO-7) and APM HYD-09. Fiber rolls and silt fencing were observed being used as perimeter controls at drilling and pole replacement sites (see Photo 1 and 2 – Attachment A). Groundwater encountered during micropile drilling along TL 629A was observed discharged to land via filter bags in accordance with APM HYD-08 and additional fiber rolls were observed placed around the filter bags for additional erosion control. Crews were observed covering soil stockpiles to prevent erosion in accordance with MM HYD-1 and MM BIO-7 (see Photo 4 – Attachment A).

During this reporting period, micropile drilling took place in proximity to private residences in TL 629A. Although the noise levels were reported below the 8-hour Leq of 75 dBA threshold, additional portable noise barriers were observed transported from Anderson Staging Yard to the segment to ensure compliance with MM NOI-1.

Traffic control measures were observed being implemented along TL 629A. Traffic flaggers were observed directing one-way traffic during overhead wire spreading along River Drive to maintain a safe travel corridor for motorists in accordance with APM TRANS-02 (see Photo 1 – Attachment A). Similarly, one-way traffic was directed by traffic flaggers during tree trimming activities in accordance with the Traffic Control Plan (TCP) (APM TRANS-05) (see Photo 3 – 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

No compliance issues were noted during this reporting period.

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 625B

Completion pending final inspection and punch-list items. The estimated completion date is June 2019. Approximately 99% complete.

TL 629A

During this reporting period, construction crews installed sediment and erosion control BMPs, as well as Project access and ESA signs, removed vegetation and trimmed trees within delineated work areas, drilled for, grouted, and tested micropile foundations, drilled for pole installation, and conducted wire spreading and potholing. The estimated completion date is July 2020. Approximately 4% complete.

TL 629C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs and conducted SWPPP punch-list items and clean-up. The estimated completion date is June 2019. Approximately 99% complete.

TL 629E

Completion pending final inspection. The estimated completion date is June 2019. Approximately 99% complete.

TL 6931

Completion pending final inspection. The estimated completion date is June 2019. Approximately 99% complete.

TL 682

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs, conducted overhead work and fiber splicing, removed wooden poles, and conducted punch-list work. The estimated completion date is July 2019. Approximately 96% complete.

TL 6957

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, and punch-list items. The estimated completion date is June 2019. Approximately 99% complete.

TL 6958

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, removed wooden poles, and conducted overhead work. The estimated completion date is June 2019. Approximately 84% complete.

C 157

During this reporting period, construction crews conducted punch-list items. The estimated completion date is June 2019. Approximately 99% complete.

C 449

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, trenched for the underground alignment, installed underground duct banks, conduit, and communication boxes, conducted overhead work, and conducted paving. The estimated completion date is August 2019. Approximately 75% complete.

C 440 Phase 1

During this reporting period, construction crews installed sediment and erosion control BMPs. The estimated completion date is May 2020. Approximately 0% complete.

ATTACHMENT A
Photos

Photo 1: A construction crew was observed spreading wire at Pole Z172804 (TL 629A). Flagmen and signs were used to regulate traffic and maintain a safe transportation corridor in accordance APM TRANS-02. Exclusionary fencing for arroyo toad was observed to be secure and in good condition in accordance with APM BIO-3.

Photo 2: A containment box was used to trap drill cuttings during micropile drilling in order to reduce dust emissions at Z173104 (TL 629A) in accordance with APM AIR-05. Fuel for the micropile equipment was observed stored within a double-walled cell to prevent the release of hazardous materials onto the ground in accordance with MM PHS-2.

Photo 3: During tree trimming at Pole Z172807 (TL 629A), archaeological and cultural monitors were observed on site in accordance with the HPMP, MM CUL-1, and APM CUL-04. Construction personnel conducted a lane closure and traffic flaggers directed one-way traffic when necessary in accordance with the Traffic Control Plan (APM TRANS-05). A complete set of fire tools was staged on site (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) in accordance with the CFPPP (MM FF-1).

Photo 4: Spoils from pole excavations occurring along TL 629A were stabilized with fiber rolls in accordance with the Erosion Control Plan and SWPPP (MM HYD-1, MM BIO-7) and excavations were securely covered in accordance with MM BIO-23.

Photo 5: A construction crew was observed removing temporary disconnects at Pole Z128035 on TL 682. Construction work occurred within the work limits and approved access road in accordance with MM BIO-1.

Photo 6: An approved avian biologist was observed monitoring a red-tailed hawk (*Buteo jamaicensis*) nest during overhead work being performed near Pole Z40987 (TL 6958) in accordance with the APP/NBMP and MM BIO-28.

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
CPUC-021	May 29, 2019	Reconstruction of C79A	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

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