	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 073** **July 14, 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 July 1, 2019 through July 14, 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 6957, Circuit (C) 449, C 440 Phase I, 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 installing Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs), conducting micropile foundation drilling, installing anchors, and cleaning-out pole hole locations (see Photos 1 through 2 – Attachment A). Near the Descanso substation (TL 629A), construction crews were observed installing poles, wire stringing, and setting up to remove circuits. At the Merrigan Staging Yard (TL 629A), crews were observed conducting vegetation removal. Along C 440, ECMs observed construction crews surveying work areas, marking underground alignments, removing vegetation, and installing BMPs. When fire risk conditions allowed such activity in accordance with the Construction Fire Protection/Prevention Plan (CFPPP) (MM FF-1), construction crews were observed excavating and grinding vault sites, placing shoring, and preparing a vault setting (see Photo 3 – Attachment A). Along C 449, construction crews were observed conducting 12 kV termination work, which included splicing underground distribution lines at a vault (see Photo 4 – Attachment A). Along TL 6957, ECMs observed construction crews closing out workspaces and installing or maintaining various erosion controls, including maintaining water bars and energy dissipaters (see Photo 5 – Attachment A), installing jute netting, and application of hydraulic mulch at various post-construction sites (see Photo 6 – Attachment A).

To prevent fugitive dust emissions during project activities, construction crews were observed applying water to prevent or mitigate fugitive dust at staging areas, unpaved access roads, and active construction areas in accordance with APM AIR-02. ECMs observed water trucks in use for compaction and dust control at the Merrigan Staging Yard (TL 629A) and Barrett Lake Road (TL 6957). Construction personnel were observed maintaining posted speeds of 15 miles per hour on unpaved roads in accordance with APM AIR-03 and MM BIO-24. ECMs observed street sweeping of sediment to minimize dust emissions from Staging Area 5 along C 440, and from an access road along TL 629A in accordance with APM AIR-05.

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, and biological monitors were observed conducting full-time monitoring of initial ground-disturbing activities such as vegetation removal along TL 629A and C 440 in accordance with MM BIO-3, as well as general biological monitoring (MM BIO-22) (see Photo 1 – Attachment A). ECMs observed the application of hydromulch at completed work sites along TL 6957 (see Photo 6 – Attachment A) in accordance with the Habitat Restoration Plan (HRP) (MM BIO-4). Environmentally Sensitive Area (ESA) signs were observed along access roads on TL 6957 marking the presence of Quino checkerspot butterfly (QCB) host plants to be avoided by construction crews in accordance with MM BIO-16. Following vault excavations along C 440, excavations were securely covered or backfilled and prevented wildlife entrapment in accordance with MM BIO-23. On July 10th, an ECM observed loose trash located adjacent to bins at the Merrigan Staging Yard and notified the on-site biological monitor. The biological monitor informed project personnel and later that day the trash was observed removed in accordance with MM BIO-26. ECMs observed pre-construction sweeps and monitoring in accordance with the Avian Protection Plan/Nesting

Bird Management Plan (APP/NBMP) and MM BIO-28 and installation of ESA signage and flagging for an active nest along C 440.

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, including vault installations along C 440 (see Photo 3 – Attachment A).

In accordance with the 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. ECMs observed activities occurring along project segments as allowed by CFPPP and fire prevention practices implemented during construction as required by the CFPPP (see Photo 5 – 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 this reporting period, an oil leak was observed by an ECM beneath staged construction equipment at the Merrigan Staging Yard (TL 629A), and an environmental monitor was notified. The oil was cleaned and additional drip pans were put in place in accordance with the SRNP. Additional drip pans and secondary catchments were observed under fuel cans, heavy equipment and generators along project segments and staging and fly yards.

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-01, MM BIO-7) and APM HYD-09. Work areas along Buckman Springs Road (C 449) were observed to have secured erosion and sediment controls (such as natural fiber covering and fiber rolls per the SWPPP) in order to minimize sediment transport and slow the flow of potential runoff in accordance with the ECP and SWPPP (see Photo 4 – Attachment A). Additionally, ECMs observed crews conducting erosion control maintenance along an access road near Barrett Lake Road (TL 6957) in accordance to MM HYD-4 (see Photo 5 – Attachment A).

Traffic control measures were observed being implemented in accordance with APM TRANS-02 during this reporting period. Traffic flaggers were observed directing one-way traffic around a work zone on TL 629A while construction crews mobilized micropile drilling equipment (see Photo 2 – Attachment A). ECMs observed the use of cones and traffic flagging on Buckman Springs Road (C 449) and Sunrise Highway (C 440) to facilitate overhead work and vault excavation, respectively. These activities were performed in accordance with the Traffic Control Plan (TCP) (APM TRANS-05).

Staging yards were observed having opaque fencing to screen the area from close-range view in accordance with APM VIS-02.

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

SDG&E reported that on July 2nd, two construction crews conducted potholing on TL 629A at locations without the required archaeological monitors present. Because neither site was listed on the plan of the day, appropriate monitors were not assigned/notified prior to work occurring. Archaeological and Native American monitors reviewed each site after the work took place and determined that no cultural resources were impacted. The incident resulted in a Level 1 Minor Deviation (APM CUL-04, MM CUL-1). At subsequent tailboard meetings, crews were reminded of the importance of notifying environmental monitors of work locations so that the required monitors are present during work activities.

CONSTRUCTION SCHEDULE AND PROGRESS

San Diego Gas & Electric (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 July 2019. Approximately 99% complete.

TL 629A

During this reporting period, construction crews installed sediment and erosion control BMPs, removed vegetation and trimmed trees within delineated work areas, drilled for, grouted, and tested micropile foundations, excavated for direct-bury pole installations, installed anchors, grounding rods, and poles, and conducted overhead work. The estimated completion date is July 2020. Approximately 13% complete.

TL 629C

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

TL 629E

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

TL 6931

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

TL 682

During this reporting period, construction crews removed BMPs, conducted site clean-up, and applied hydromulch. The estimated completion date is July 2019. Approximately 98% complete.

TL 6957

During this reporting period, construction crews conducted SWPPP and overhead punch-list work, as well as clean-up. The estimated completion date is July 2019. Approximately 99% complete.

TL 6958

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

C 157

During this reporting period, construction crews conducted punch-list work. Completion pending final inspection. The estimated completion date is July 2019. Approximately 99% complete.

C 449

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, as well as pulled and spliced underground cable. The estimated completion date is August 2019. Approximately 89% complete.

C 440 Phase I

During this reporting period, construction crews installed sediment and erosion control BMPs, and excavated for underground vaults. The estimated completion date is May 2020. Approximately 32% complete.

ATTACHMENT A
Photos

Photo 1: A biological monitor was observed clarifying the work limits to construction crew members at an anchor installation site associated with Pole P163905 (TL 629A) in accordance with MM BIO-22. Additionally, the workspace was observed to be clearly delineated with staking in accordance with MM BIO-1.

Photo 2: During micropile drilling operations along River Drive at Pole Z373253 (TL 629A). A traffic flagger was observed conducting a lane closure and directed one-way traffic in accordance with the TCP (APM TRANS-05) and APM TRANS-02.

Photo 3: A biological, archaeological, and Native American monitor were present for the excavation of a vault site along Sunrise Highway (C 440) in accordance with MM BIO-22, MM CUL-1, APM CUL-04, and the HPMP.

Photo 4: A construction crew was observed splicing 12 kV lines at a vault along C 449. Fiber rolls were observed along the work space in good condition in accordance with the ECP and SWPPP (MM HYD-1, MM BIO-7).

Photo 5: Crews were observed conducting erosion control work along the access road between Pole Z571454 (TL 6957) and Barrett Lake Road, such as maintaining a water bar and energy dissipater in accordance with MM HYD-4. The crew was observed watering the work area to prevent ignitions with a 150-gallon tank, pump, and hose. These activities were performed in accordance with the CFPPP fire prevention matrix for grading work on CNF land with a PAL of D. Additionally, a complete set of fire tools was staged on site (5-gallon backpack pump, round point shovel, Pulaski, and 2A10BC fire extinguisher) within 50 feet in accordance with the CFPPP (MM FF-1).

Photo 6: Hydraulic mulch was observed applied at completed Pole Z571463 (TL 6957) and along the access road for post-construction erosion control in accordance with the ECP, SWPPP, and HRP (MM HYD-1, MM BIO-9, MM BIO-4).

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
CPUC-022	June 18, 2019	Reconstruction of TL 625C	Y
CPUC-023	July 11, 2019	Reconstruction/Removal of C440 Phase I Overhead	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
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
037	6/28/19	Expansion of the Merrigan Staging Yard	Approved	7/03/19