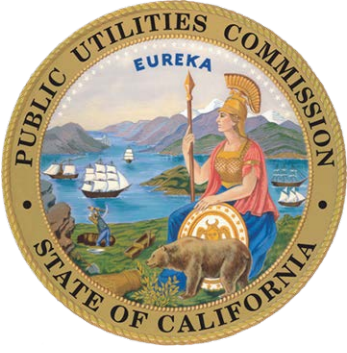


| | |
|---|---|
|  | California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting</i> <i>Program</i> |
| | Cleveland National Forest Power Line Replacement Projects Compliance Status Report: 093 April 19, 2020 |

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 April 6 through April 19, 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 Lines (TL) 6923, TL 625C, TL 626 Conversion North (Circuit 222), Circuit (C) 440, C 79A, 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 6923, CPUC ECMs observed crews drilling for micropile foundations, conducting overhead work, trimming micropile casing and rebar, grouting, testing ground

wire, and helicopter operations. Along TL 625C, CPUC ECMs observed crews conducting overhead line work. Along TL 626 Conversion North (C 222), CPUC ECMs observed crews removing vegetation, installing erosion control Best Management Practices (BMPs), digging for direct-bury pole holes, and tree trimming. Along C 79A, CPUC ECMs observed crews installing erosion control BMP reinforcements at Azalea Staging Yard, cleaning and painting a manhole, mandrelling a conduit near 50+00, and conducting BMP maintenance along the alignment. Along C 440 Phase I, CPUC ECMs observed crews excavating trenches, pulling underground cable, paving, wire saw cutting, installing and slurring-in conduit, digging for direct-bury pole holes and anchors, installing grounding rods, and inspecting erosion control BMPs along Sheephead Mountain Road.

To prevent fugitive dust emissions during project activities, crews were observed applying water to prevent fugitive dust along unpaved access roads and in work areas in accordance with APM AIR-02. 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 (see Photo 1 – Attachment A). Construction crews were observed applying water during drilling and using cuttings containment boxes to prevent dust emissions 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. 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 (see Photo 2 – Attachment A), 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. Avian biologists were observed conducting nesting bird surveys and were present to monitor bird nests during construction activities in accordance with the Avian Protection Plan/Nesting Bird Management Plan (APP/NBMP) and MM BIO-28.

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. 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 (see Photos 3 and 4 – Attachment A).

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 observed carrying the required 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. 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, 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, covering containment that may contain hazardous materials during rain events, 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-01, MM BIO-7), and APM HYD-09 (see Photo 5 – Attachment A). 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 (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

One Level 1 Minor Deviation occurred during this reporting period.

CPUC reported on April 15 that previously observed sediment discharge off Sheephead Mountain Road in the area of P40059 on Phase I of C 440 was still observed. This sediment had been observed and reported in early April before a series of storms restricted access for inspections and corrective actions. The incident was a violation of MM HYD-1, and the CPUC issued a Level 1 Minor Deviation on April 15. As reported by SDG&E, construction crews cleaned up the sediment, increased the capacity of the

gravel bag berm with the installation of a gravel bag spillway three bags high and ten bags long, installed fiber rolls on both ends of the gravel bag spillway to extend perimeter controls, and installed fiber roll perimeter controls to control run-on along the east side of Sheephead Mountain Road.

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 682, TL 6957, TL 629C, TL 6958, and C 449

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

TL 629A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs and installed fencing. The estimated completion date is July 2020. Approximately 76% complete.

TL 625C

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; removed vegetation; dewatered; maintained and graded access roads; assembled, installed, and removed poles; installed conduit; and conducted overhead and wire-stringing operations. The estimated completion date is May 2020. Approximately 95% complete.

TL 6923

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; drilled for, capped, grouted, tested and installed micropiles; assembled, installed, and removed poles; excavated for anchor holes; installed grounding rods; conducted overhead operations; and replaced pole hole covers. The estimated completion date is August 2020. Approximately 58% complete.

TL 626 Conversion North (C 222)

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; maintained and graded access roads; removed vegetation; and trimmed trees. The estimated completion date is September 2020. Approximately 7% complete.

TL 626 RFS

No work was conducted this reporting period. The estimated completion date is October 2020.

C 440 Phase I

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, maintained and graded access roads, excavated for and installed anchors and conduit, installed grounding rods, conducted overhead operations, ground asphalt and paved, stripped and finished handolds, and conducted backfill operations. The estimated completion date is August 2020. Approximately 85% complete.

C 79A

During this reporting period, construction crews installed sediment and erosion control BMPs at the Wilderness Staging Yard and Azalea Springs Staging and Fly Yard, and inspected/maintained BMPs; removed snow; excavated for, installed, and mandrelled conduit; cleaned and mandrelled manholes; proofed and painted vaults; conducted backfill and compaction operations; and conducted wire-stringing operations. The estimated completion date is June 2020. Approximately 81% complete.

ATTACHMENT A Photos



Photo 1: In accordance with APM AIR-03 and MM BIO-24, project personnel were observed abiding by the posted 15 mph speed limit (access road off Round Potrero Road near Z972808 (TL 6923)).

ATTACHMENT A (Continued)



Photo 2: A biological monitor was observed monitoring vegetation removal at P259374 (TL 626 Conversion North (C 222)) in accordance with MM BIO-3 and MM BIO-22.

ATTACHMENT A (Continued)



Photo 3: Perimeter fiber rolls at a micropile location along TL 6923 were weighted down with gravel bags instead of being trenched into the ground in order to prevent ground disturbance in an area with a higher potential for cultural resources, in accordance with the HPMP (MM CUL-1) and APM CUL-03.

ATTACHMENT A (Continued)



Photo 4: A cultural ESA surrounding a pole and access road along TL 626 Conversion North (C 222) was clearly delineated, and “no grading” signage was present on the road in accordance with the HPMP (MM CUL-1) and APM CUL-03.

ATTACHMENT A (Continued)



Photo 5: A designated concrete washout station at Staging Area 1 (C 440 Phase I) was observed to be covered in the morning, indicating that it had been covered during recent rain events in accordance with the project's SWPPP (MM HYD-1 and MM BIO-7).

ATTACHMENT A (Continued)



Photo 6: During clipping in of 12-kilovolt wire at Z272989 (TL 625C), personnel directed one-way traffic along Japatul Valley Road 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 |

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 | Pending | |
| 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 |