	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 094** **May 3, 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 20 through May 3, 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 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 or direct-bury pole holes; trenching for ground rod installation; using helicopter external load

operations to set up testing equipment, mobilize drilling equipment, and set poles; conducting overhead work; and maintaining vegetation. Along TL 626 Conversion North (C 222), CPUC ECMs observed crews digging for direct-bury pole holes and anchors, dewatering, and managing materials at the Santa Ysabel Staging Yard. Along C 79A, CPUC ECMs observed crews managing spoils stockpiles at the Wilderness Staging Yard; setting vaults; excavating trenches, installing conduit, and backfilling; pulling underground cable; and maintaining erosion control Best Management Practices (BMPs) at the Azalea Staging Yard and along the alignment. Along C 440 Phase I, CPUC ECMs observed crews trimming trees, potholing, excavating trenches, pulling underground cable, paving, wire saw cutting, installing and slurrying-in conduit, digging for direct-bury pole holes and anchors, removing spoils, installing grounding rods, and conducting clean-up activities.

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 (see Photo 2 – 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 (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 (see Photo 2 – 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. 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 Photo 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 and other tools as required by the CFPPP (see Photos 2, 4, and 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 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, 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 and MM BIO-7), and APM HYD-09. Other BMPs in the SWPPP, such as hydromulch application, concrete waste containment, and street sweeping were also were observed along the alignments (see Photo 6 – 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.

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 April 23, a crew stockpiled excavation spoils at a non-project location on TL 626 Conversion North at the request of the landowner, who wanted to fill erosion features at a culverted creek crossing along a driveway. However, the crew and its environmental liaison failed to follow established protocol for vetting potential soil-gifting sites. Runoff from the stockpile or from the landowner's eventual work could have resulted in deposition into the creek. The incident was a violation of MM BIO-1 and resulted in a Level 1 Minor Deviation. The stockpiled material was removed using hand tools, brooms, and a vacuum, and the incident was discussed by SDG&E in the field and at the tailboard meeting.

CPUC and SDG&E reported that on May 1, crews utilized a filter bag to dewater a pole hole and placed it on a dirt access road north of the work area at pole Z972804 on TL 6923. Typically, filter bags are placed in a vegetated upland area to allow for the water to filter through the vegetation and into the ground; however, due to sensitive resources in the area, the crew placed the bag on an existing access road. As a result, some of the water from the bag flowed down the access road, across a portion of the work area, and out of the work area, which resulted in some off-site sedimentation. In addition, the hose briefly detached from the filter bag, resulting in a temporary increase in the volume and velocity of the water. The incident was a violation of MM HYD-1, APM HYD-05, and APM HYD-08, and resulted in a Level 1 Minor Deviation. Per SDG&E, no jurisdictional waterways or other sensitive resources were impacted, and the crew removed the off-site sedimentation. The importance of BMPs and runoff prevention was discussed with crews at the tailboard meeting.

SDG&E reported that on April 28, a crew working on C 79A parked a truck on Burnt Pine Fire Road, which is unapproved for project use. Per SDG&E, the crew was asked to move the truck back into the project work limits on Lookout Road. Later in the day, two more trucks were parked on Burnt Pine Fire Road. The incident was a violation of MM BIO-1 and resulted in a Level 1 Minor Deviation. SDG&E discussed the incident at the tailboard meeting.

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; trimmed trees; excavated for and removed poles; installed fencing; excavated for, installed, topped, rotated, and removed poles; poured concrete; conducted overhead and wire-stringing operations; and conducted backfill and compaction operations. The estimated completion date is May 2020. Approximately 98% complete.

TL 6923

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; removed and chipped vegetation; dewatered; drilled for, capped, grouted, tested, and installed micropiles; drilled for, topped, and installed poles; assembled, topped, installed, and removed poles; installed grounding rods; poured concrete; conducted backfill operations; and conducted overhead and wire-stringing operations. The estimated completion date is August 2020. Approximately 63% complete.

TL 626 Conversion North (C 222)

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; dewatered; maintained access roads; trimmed trees; excavated for pole and anchor holes; conducted overhead work; and conducted backfill operations. The estimated completion date is September 2020. Approximately 7% complete.

TL 626 RFS

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs. 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; trimmed trees; maintained and graded access roads; drilled for, assembled, and installed poles; conducted overhead and wire-stringing operations; excavated for and installed conduit; drilled for and installed anchors and bollards; conducted wire-stringing operations; poured concrete and grouted; stripped and finished handholds; mandrelled between vaults; set bases, pads, and vaults; conducted underground cable-pulling operations; conducted backfill operations; paved; and removed spoils. The estimated completion date is August 2020. Approximately 88% complete.

C 79A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; excavated for and installed conduit; installed, painted, mandrelled, racked, and proofed vaults; conducted backfill and compaction operations; hydromulched; conducted underground cable-pulling operations; and conducted wire-stringing operations. The estimated completion date is June 2020. Approximately 86% complete.

ATTACHMENT A
Photos

Photo 1: A water tender was observed applying water to the surface at Sol Valley South Staging Yard (TL 6923) throughout the day to reduce dust emissions, especially in areas where helicopter activity was occurring, in accordance with APM AIR-02.

Photo 2: A crew was observed digging a direct-bury pole hole at P259369 (TL 626 Conversion North (C 222)) within clearly delineated work limits in accordance with MM BIO-1. Fire tools were observed on site in accordance with the CFPPP (MM FF-1).

Photo 3: A biological monitor was observed monitoring trench excavation near 26+00 (C 79A) in accordance with MM BIO-22. In addition, a full set of fire tools was observed within 50 feet in accordance with the CFPPP (MM FF-1).

Photo 4: A nest buffer sign for a nesting pair of red-tailed hawks in an adjacent lattice transmission tower was documented along the access road near Z972848 (TL 6923) in accordance with the APP/NBMP (MM BIO-28). The sign (and others) were installed by the avian biologist after the nest was reported to the avian biologist by the on-site biological monitor the previous work day.

Photo 5: A crew was observed removing spoils from a pole location along TL 626 Conversion North (C 222). Archaeological and cultural monitors were observed monitoring the activity in accordance with the HPMP (MM CUL-1) and APM CUL-04.

Photo 6: A street sweeper was used to remove debris from the C 440 Phase I road during trench patching in accordance with the project SWPPP (MM HYD-1 and MM BIO-7).

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
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

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
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	7/26/29	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