	California Public Utilities Commission ***Mitigation Monitoring, Compliance, and Reporting Program***
	Cleveland National Forest Power Line Replacement Projects **Compliance Status Report: 098** **June 28, 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 June 15 through June 28, 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) 629A, TL 626 Conversion North (Circuit (C) 222), TL 626 Conversion South (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 629A, CPUC ECMs observed crews digging a direct-bury pole hole and framing the rack near Glencliff Substation, framing setting poles, and conducting overhead work. Along TL 626 Conversion North (C 222), CPUC ECMs observed crews dewatering, digging direct-bury pole holes, excavating a trench for ground rod installation, backfilling for installation of new poles, removing old wooden poles, framing poles, conducting overhead work, and wrecking-out wire. Along TL 626 Conversion South (C 79B), CPUC ECMs observed crews removing vegetation and installing erosion control Best Management Practices (BMPs), trimming trees, digging direct-bury pole holes, covering open excavations and spoils stockpiles, and trenching for ground rod installation. Along C 440, CPUC ECMs observed crews removing vegetation and installing erosion control BMPs, drilling direct-bury pole holes and anchor excavations, excavating a trench for ground rod installation, backfilling the trench after installation, and conducting overhead work.

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 (see Photo 1 – Attachment A). 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. Construction crews were observed removing track-out from paved access roads 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, 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 (see Photo 3 – 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. Paleontological monitoring was observed at work locations in accordance with the Paleontological Monitoring and Treatment Plan (APM CUL-08) (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 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 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-1 and MM BIO-7), and APM HYD-09 (see Photos 3 and 4 – 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).

In accordance with APM VIS-02, construction activities were observed being kept as clean and inconspicuous as practical.

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

Four Level 1 Minor Deviations and two Level 2 Non-Compliances occurred during this reporting period.

SDG&E reported that on June 15, discarded rods were observed within a cultural ESA on TL 6923. Cultural monitors inspected the area and found no impacts. The incident was a violation of MM BIO-1 and the conditions of the HPMP Section 3.1.3.4 "Avoidance Measures for Resources with ESAs" and resulted in a Level 1 Minor Deviation.

SDG&E reported that on June 16, it was discovered that crews working on TL 6923 had, without the presence of cultural monitors, pulled existing wood poles, cut existing wood poles at ground level, and pulled an existing wood pole that should have been cut at ground level. In the case of one of the locations, a crew removed the pole base immediately after a cultural monitor instructed the crew not to do so. The crew was shut down for the day. For the other pole locations, SDG&E was not able to determine exactly when the removal activities occurred. Cultural monitors did not visually identify any disturbed cultural resources on the ground surface at these locations, but it was difficult to conclude whether subsurface resources were disturbed. These incidents were violations of MM CUL-3, APM CUL-04, and the conditions of the HPMP Section 3.1.3.4, "Avoidance Measures for Resources with ESAs," and resulted in a Level 2 Non-Compliance. Corrective actions for June 15 and June 16 are described in the following paragraph.

The pattern of non-compliance related to cultural resource protection resulted in the termination of two crew members. Per SDG&E, the importance of staying within the approved work limits and outside of ESAs, as well as the requirement for archaeological monitors to be present during certain activities, have been reinforced during daily tailboards with the general foremen and crews. In addition, two field safety stand-downs occurred on June 11 and 17 with construction management and crews to further emphasize the importance of environmental compliance on this Project. A Non-Compliance Report was submitted to the CPUC and U.S. Forest Service (USFS) on June 23, 2020. SDG&E solicited additional corrective actions from its contractor, which will be communicated to the CPUC and USFS upon implementation.

SDG&E reported that on June 17, a CPUC ECM observed a crew clearing vegetation at P259701 on TL 626 Conversion South without a biological monitor present. Per SDG&E, construction at this pole was not mentioned at the tailboard meeting. The crew cleared approximately 4 square feet of chamise (*Adenostoma fasciculatum*) in the middle of the workspace; the chamise was approximately 1 foot tall. No sensitive species were impacted. The incident was a violation of MM BIO-3 and resulted in a Level 1 Minor Deviation. Per SDG&E, the importance of proper planning and scheduling was stressed at the tailboard meeting.

SDG&E reported that on June 19, an avian biologist observed a crew replacing the old wood pole at P258597 on TL 626 Conversion South. The avian biologist had previously observed an active house finch (*Haemorhous mexicanus*) nest within the bracket of the old wood pole. When the avian biologist arrived on site, the old pole had been cut and was on the ground. The area was inspected for nestlings and nest material; nest material and a viable egg were observed, but no nestlings were present. The avian biologist

determined that the nest failed due to construction activities. No signage was present to indicate that there was an active nest buffer at this pole location. Construction at this pole was not mentioned at the tailboard meeting. The incident was a violation of the Nesting Bird Management Plan and resulted in a Level 1 Minor Deviation. Per SDG&E, the importance of proper planning and scheduling was stressed at the tailboard meeting.

SDG&E reported that on June 19, a CPUC ECM observed a crew conducting overhead work at P259376 on TL 626 Conversion North with no fire tools on site. The CPUC ECM inquired twice about where the crew's fire tools were before the crew retrieved the tools out of a parked truck approximately 400 feet away. The incident was a violation of the Project's CFPPP and resulted in a Level 2 Non-Compliance. The crew was removed from the Project pending an investigation into the incident. In addition, SDG&E met with construction management about maintaining compliance with the Project's CFPPP. The same message was relayed to the field crews during the tailboard meeting.

SDG&E reported that on June 24, oil-stained soil was observed at P258593 on TL 626 Conversion South from a spill that had not been reported to environmental personnel. The spill had not been properly cleaned up and contaminated soil had not been removed from the right-of-way since foundation drilling work occurred at that location on June 23. Environmental personnel were notified and the contaminated soil was cleaned up on June 25. The incident was a violation of MM PHS-2 and the Project's Spill Response and Notification Plan and resulted in a Level 1 Minor Deviation. Per SDG&E, the requirement of immediate clean-up and reporting of hazardous material spills was reiterated to crews during tailboard meetings.

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, and TL 6958

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

TL 625C

During this reporting period, construction crews removed poles and conducted site cleanup. 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; poured concrete; excavated for and assembled, installed, and topped poles; graded for pads; installed plates over water crossings; and conducted overhead and wire-stringing operations. The estimated completion date is August 2020. Approximately 82% complete.

TL 6923

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; removed and assembled poles; conducted backfill operations; and conducted overhead and wire-stringing operations. Completion pending site clean-up and punch-list items. The estimated completion date is August 2020. Approximately 92% complete.

TL 626 Conversion North (C 222)

During this reporting period, construction crews installed, inspected, and maintained sediment and erosion control BMPs; poured concrete; removed, assembled, and installed poles; conducted compaction and backfill operations; and conducted overhead and wire-stringing operations. The estimated completion date is August 2020. Approximately 55% complete.

TL 626 RFS

During this reporting period, construction crews installed and maintained sediment and erosion control BMPs, removed poles, and conducted overhead operations. The estimated completion date is December 2020. Approximately 16% complete.

TL 626 Conversion South (C 79B)

During this reporting period, construction crews installed sediment and erosion control BMPs; installed signage and flagging; removed and chipped vegetation; trimmed trees; maintained access roads; excavated for, drilled, and perforated for pole holes; and excavated for and installed grounding rods. The estimated completion date is December 2020. Approximately 12% complete.

C 440 Phase I

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs, worked on pavement striping, and excavated for pole installation. The estimated completion date is August 2020. Approximately 97% complete.

C 440 Phase II

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; trimmed trees; removed and chipped vegetation; excavated for and installed fencing; installed signage; excavated for and installed poles and anchors; graded access road; developed the Shrine Camp and Air Force Staging and Fly Yards and Rec Barn Staging Yard; excavated for and installed grounding rods; potholed; marked out trench; and saw-cut and ground asphalt. The estimated completion date is December 2020. Approximately 3% complete.

C 79A

During this reporting period, construction crews inspected and maintained sediment and erosion control BMPs; spliced and terminated cable; removed vegetation; installed switches; and conducted overhead operations. The estimated completion date is July 2020. Approximately 98% complete.

ATTACHMENT A
Photos

Photo 1: A water tender was observed applying water to the access road near Shrine Camp Staging Yard (C 440 Phase II) after the morning tailboard to minimize dust emissions during crew egress in accordance with APM AIR-02.

Photo 2: A "drive-through only" avian nest buffer/ESA was documented along the access road to P258481 (TL 626/C 79B) in accordance with the APP/NBMP (MM BIO-28).

Photo 3: Archaeological and Cultural Monitors were observed monitoring anchor excavation and inspecting spoils for sensitive resources along C 440 Phase II in accordance with the HPMP, APM CUL-04, and MM CUL-1. In addition, the pole hole and spoils stockpile were observed to be covered in accordance with MM BIO-23, the ECP (MM HYD-1), and the SWPPP (MM HYD-1, MM BIO-7).

Photo 4: A Paleontological Monitor was observed monitoring pole hole digging along C 440 Phase II in accordance with APM CUL-08.

Photo 5: A Designated Fire Patrol was observed monitoring conductor work with de-energized lines at P260436 (C 440 Phase II) in accordance with the CFPPP Fire Prevention Matrix for the activity on USFS land with a PAL D (MM FF-1). A Project WEAP sticker was observed on the Fire Patrol's hard hat in accordance with MM BIO-2.

Photo 6: Cones, signage, and flagpersons were used to direct one-way traffic around the work area for Vault 71 and P259843 and P259844 (C 440) in accordance with the Traffic Control Plan (APM TRANS-05) and 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 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
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	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
047	4/9/20	Modify components of TL 626 Conversion North /TL 626 RFS	Approved	4/22/20