

California Public Utilities Commission Mitigation Monitoring, Compliance, and Reporting Program

East County (ECO) Substation Project

Compliance Status Report: 027

April 13, 2014

SUMMARY

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS) for the East County (ECO) Substation Project. 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/EIS to mitigate or avoid significant 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. This compliance status report covers construction activities from March 31 2014 through April 13 2014.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party environmental compliance monitor conducted site observations along the right-of-way associated with the 138 kV Underground Transmission Line, 138 kV Overhead Transmission Line, East County Substation and Boulevard Substation Rebuild. Areas of active and inactive construction within the project limits were observed to verify implementation of the mitigation measures stipulated in the project's MMCRP. Daily observations were documented on daily site inspection forms and applicable mitigation measures were reviewed in the field.

Implementation Actions

138 kV Underground Transmission Line

Construction activities during this reporting period consisted of repair and maintenance of erosion control devices along the ROW; excavation, conduit placement, and backfilling; continued jack-and-bore drill

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activities; vault installation and in-and-out tie-in activities; horizontal directional drilling; and the initiation of saw-cutting and trench excavation within Carrizo Gorge.

Biological monitors were onsite to ensure construction activities remained within the approved work limits and to monitor for sensitive wildlife species (MM-BIO-1a and MM-BIO-1c). Nesting bird surveys were completed in advance of construction activities and monitors were diligent in enforcing nesting bird buffers in accordance with MM-BIO-7j.

Dust control measures in line with MM-AQ-1 and MM-BIO-4a, including watering areas of active construction and maintaining rattle plates and rock aprons at points of ingress/egress were observed to be effective. All project vehicles were observed to be maintaining speed limits of 15 MPH or less, and tracout was observed being removed daily from Old Highway 80.

Erosion control measures consisting of straw wattles, silt fence and gravel bags are being maintained along the right-of-way in accordance with the SWPPP and MM-HYD-1. Staged and active stationary equipment had containment in place as required by MM-HAZ-1a (see Photo 1 – Attachment A). Jurisdictional waterways were marked off with blue flagging to highlight their location for avoidance. ESA's that identified special status plants as stipulated by MM-BIO-5b were clearly identified with signage throughout the right-of-way.

Per the Construction Fire Prevention/Protection Plan, SDG&E was observed inspecting equipment along the right-of-way to ensure fire suppression equipment was present. Routine patrols were completed by the fire inspection team throughout the construction activities and fire tools were observed at all construction sites as required by MM-FF-1.

138 kV Overhead Transmission Line

Construction activities during this reporting period consisted of continued rough-grading and rock and spoil removal at pole pad sites and access roads; continued drilling and construction of foundations; wood chipping and vegetation clearing; rock-drilling and pad development; and continued maintenance and repair of sediment and erosion control devices throughout all active pole sites.

In accordance with MM-BIO-1c, biological monitors were onsite to survey areas of active construction for compliance with biological mitigation measures. Topsoil was observed staged along the limits of work that will be utilized for restoration activities in accordance with MM-BIO-1d. Drip pan containment bins were observed beneath equipment staged along the right-of-way in accordance with MM-HAZ-1a and spill kits were accessible in case of hazardous materials leak.

During chipping activities, crews were diligent in spreading vegetation and wood chippings to minimize fire risk (see Photo 2 – Attachment A).



Archaeological and Native American observers were onsite monitoring initial ground disturbance and construction activities in proximity to ESA's in accordance with MM-CUL-1d. Additionally, the limits of work and ESAs were clearly marked in the field per MM-CUL-1a.

Water trucks were being utilized during rock breaking and pad site finish grading to minimize fugitive dust emissions in accordance with the Dust Control Plan and MM-BIO-4a. Track-out measures consisting of rumble plates and rock aprons were also observed to be in place and being maintained (see Photo 3 – Attachment A).

East County Substation

Construction activities during this reporting period consisted of continued delivery of spoil for rough-grading of the southeast corner of the 500 kV pad; continued topsoil spreading; continued concrete form building and substation structures and buildings construction; continued foundation drilling for the piers within the 500 kV pad; continued installation of ground grid and electrical systems; installation and wiring of circuit breakers; erection of steel A-frames and H-braces; continued wiring within the control shelter and other buildings; pouring of Class II base within the 230/138 kV substation pad; installation of drivable grass pavers along both sides of the southern access road; and continued repair and maintenance of installed sediment and erosion control devices throughout the site.

In accordance with MM-BIO-1a the limits of work were clearly delineated and respected by construction crews during ongoing construction activities along access road and within the substation. Erosion control measures consisting of straw wattles, silt fencing and hydromulched slopes were in place and being maintained in accordance with MM-HYD-1 and the Project SWPPP. Hazardous materials staged onsite were placed within proper containment and labeled in accordance with MM-HAZ-1a. No smoking signs were clearly marked and adjacent to the hazardous waste areas (see Photo 4 – Attachment A).

A fire patrol was on site and actively checking all entering personnel for WEAP training stickers and required fire equipment in accordance with MM-FF-1. Throughout the substation, fire tools were set out at individual areas of work for easy access in case of an emergency and in accordance with the Construction Fire Prevention/Protection Plan and MM-FF-1.

Water trucks equipped with hoses were observed being utilized to water down areas of active construction and access roads to minimize fugitive dust emissions in accordance with MM-BIO-4 and MM-AQ-1. Topsoil salvaged during initial grading was stockpiled along slopes of the substation, set aside to be used during restoration efforts in accordance with MM-BIO-1d and the Habitat Restoration Plan.



Boulevard Substation

Construction activities during this reporting period consisted of concrete form and foundation construction, continued installation of circuit breakers and wiring, continued form building for the wing walls associated with the box culvert under Old Highway 80, and installation of drivable concrete pavers for the irrigation V-ditch.

In accordance with MM-BIO-4a and MM-AQ-1, water buffaloes were used to control dust within work areas during substation construction, including trenching around foundations and backfilling. Water trucks were observed watering down access roads and commonly used routes within the substation boundaries. A rock apron and rattle plate was also observed being maintained at the primary point of ingress/egress along Old Highway 80 to minimize the potential for track-out and associated fugitive dust emissions.

MM-VIS-3e requires that opaque visual screening material be used in areas of high public visibility to reduce visibility of construction activities and equipment. Project personnel responded in a timely manner when high winds resulted in the visual screening material needing to be repaired (see Photo 5 – Attachment A).

Hazardous materials stored onsite were observed to be labeled and staged in proper containment bins per MM-HAZ-1a. As required by MM-HYD-1, stockpiled materials had erosion control devices in good condition and concrete truck operators were utilizing designated concrete washout stations following concrete pours.

Construction equipment and staged materials throughout the substation were equipped with drip pan containment as stipulated by MM-HAZ-1a and fire suppression equipment per MM-FF-1. Fire patrol was on site and actively checking all entering personnel for SWEAP training stickers in accordance with MM-FF-1 and the Project Health and Safety Plan outlined in MM-HAZ1-b. As specified in MM-HAZ-1c, trash storage bins were equipped with covers to avoid dispersal due to weather or wildlife (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/FEIS for the ECO Substation Project, as adopted by the CPUC on April 19, 2012 (Decision 12-04-022).

Compliance

On April 4, a flatbed truck traveled off the approved access road and traveled along an existing dirt access road that was not approved for use during construction. A SDG&E environmental monitor notified the truck driver and directed him back to the approved access road. The event was determined to



be a deviation from MM-BIO-1a, which requires that all project related vehicles travel along the approved access roads. Following the incident, environmental monitors surveyed the area to determine whether any sensitive resources were impacted. No issues/concerns were reported by the SDG&E environmental monitors. In order to minimize the potential for similar incidents occurring in the future, the construction contractor will be responsible for escorting all new subcontractors to the work areas.

CONSTRUCTION PROGRESS

Boulevard Substation Rebuild Site

Construction activities associated with foundation and concrete forms, drilling pier foundations, and installing circuit breakers and the associated wiring continued during this reporting period.

ECO Substation Site Construction

Crews continue completing activities associated with the concrete form building, drilling pier foundations and installation of the ground grid and electrical system. Crews were also observed erecting A-frames and H-braces.

138 kV Underground Construction

Construction crews have completed 29 vaults and 49% of trenches have been excavated and backfilled.

138 kV Overhead Construction

Forty-seven steel pole pads/spur roads have been completed, eight pole foundations are complete, and one pole has been erected.

CONSTRUCTION SCHEDULE

ECO Substation 500 kV and 230/138 kV Yards – SDG&E began construction activities in March 2013 and is anticipated to complete construction in September 2014.

SWPL Loop-In – SDG&E has not initiated any construction activities at this time associated with the SWPL Loop-In. SDG&E is anticipated to complete construction in June 2014.

138 kV Underground Transmission Line – SDG&E began construction activities in October 2013 and is anticipated to complete construction in November 2014.

138 kV Overhead Transmission Line – SDG&E began construction activities in November 2013 and is anticipated to complete construction in November 2014.

Boulevard Substation Rebuild – SDG&E began construction in December 2012 and is anticipated to complete construction in November 2014.

DUDEK

ATTACHMENT A Photos



Photo 1: Staged and active stationary equipment was observed to have containment in place as required by MM-HAZ-1a.



Photo 2: During chipping activities along the 138 kV overhead alignment, crews were diligent in spreading vegetation and wood chippings to minimize fire risk.

ATTACHMENT A (Continued)



Photo 3: Track-out measures consisting of rumble plates and rock aprons were observed to be in place along the 138kv overhead alignment and being maintained in accordance with MM-AQ-1 and MM-BIO4-a.



Photo 4: Hazardous materials staged on site at ECO Substation were placed within proper containment and labeled in accordance with MM-HAZ-1a. No smoking signs were clearly marked and adjacent to the hazardous waste areas.

ATTACHMENT A (Continued)



Photo 5: Opaque visual screening material is being maintained along the fence line at the Boulevard Substation in accordance with MM-VIS-3e.



Photo 6: Trash storage bins at Boulevard Rebuild Substation were equipped with covers in accordance with MM-HAZ-1c.

ATTACHMENT B Notices to Proceed

| NTP No. | Date Issued | Description | |
|----------|--------------------|---|---|
| BLM-001 | February 11, 2013 | A single geotechnical boring to finalize the design of the underground transmission alignments on lands administered by the BLM | Y |
| CPU -001 | November 30, 2012 | Abatement activities at the Boulevard Substation Rebuild Site | Υ |
| CPUC-002 | February 1, 2013 | Construction of a new substation (a 500 kV yard and a 230/138 kV yard) | Υ |
| CPUC-003 | February 1, 2013 | Geotechnical Activities | Υ |
| CPUC-004 | March 4, 2013 | Geotechnical Activities | Υ |
| CPUC-005 | May 21, 2013 | Construction Yards | Υ |
| CPUC-006 | July 2, 2013 | 138 kV Underground Transmission Line along Southern Access Road | Υ |
| CPUC-007 | July 30, 2013 | 138 kV Underground Transmission Line within Old Highway 80 and Carrizo Gorge Road | Y |
| CPUC-008 | August 2, 2013 | Construction activities associated with the Boulevard Substation Rebuild | Υ |
| CPUC-009 | September 25, 2013 | 138 kV Underground Transmission Line from Boulevard Substation to 138 kV Overhead Transmission Line | |
| CPUC-010 | October 17, 2013 | 138 kV Underground Transmission Line from Carrizo Gorge Road to Steel Pole 91 | |
| CPUC-011 | November 5, 2013 | 138 kV Overhead Transmission Line | Υ |
| CPUC-012 | November 19, 2013 | Fault Investigations at the Southwest Powerlink (SWPL) Loop-In | Υ |
| CPUC-013 | December 4, 2013 | 138 kV Overhead Transmission Line Steel Pole- 105B and Steel Pole- 108A | |
| CPUC-014 | March 18, 2014 | Construction of Southwest Powerlink (SWPL) loop-in to connect the existing 500 kV SWPL transmission line to the ECO Substation site | |



ATTACHMENT C Minor Project Refinement Requests

| Minor Project Refinement Request No. | Submitted | Description | Status | Approval |
|--|-------------------|--|----------|--------------------|
| 001 | January 25, 2013 | Temporary Retention Basin | Approved | February 7, 2013 |
| 002 | March 22, 2013 | Adjustments to the Domingo Lake and Jewel Valley Construction Yards | Approved | May 20, 2013 |
| 003 | March 22, 2013 | Adjustments to the Carrizo Gorge Construction Yard | Approved | May 20, 2013 |
| 004 | May 17, 2013 | Adjustments to the Southern Access Road and 138 kV Overhead and Underground Transmission Line | Approved | June 26, 2013 |
| 005 | June 27, 2013 | Adjustments to the Boulevard Substation Rebuild | Approved | July 26, 2013 |
| 006 | July 30, 2013 | Adjustments to the 138 kV Overhead Transmission Line | Approved | September 23, 2013 |
| 007 | August 16, 2013 | Relocation of Temporary Retention Basin | Approved | August 22, 2013 |
| 800 | August 20, 2013 | Construction Water Use | Approved | October 1, 2013 |
| 009 | November 22, 2013 | Additional Temporary Work Space for Fence Replacement | Approved | November 26, 2013 |
| 010 | December 19, 2013 | Access Road and Work Space Refinements at Steel Pole 63 and 64 | Approved | January 14, 2014 |
| 011 | January 16, 2014 | Temporary Meeting Location for Material and Equipment | Approved | January 22, 2014 |
| 012 | February 27, 2014 | Work Space Refinements to the Southwest Powerlink | Approved | March 11, 2014 |

