

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p>
	<p>East County (ECO) Substation Project</p> <p>Compliance Status Report: 013</p> <p>September 29, 2013</p>

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 September 16 to September 29, 2013.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party environmental compliance monitor conducted site observations at the Boulevard Substation Rebuild Site, 138 kV Underground Transmission Line, ECO Substation, Jewell Valley Construction Yard, Domingo Lake Construction Yard and at Carrizo Gorge Construction Yards 1 and 2. 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

ECO Substation

Construction activities at the ECO Substation site primarily consisted of excavating and pouring concrete foundations for substation components at the 138/230 kV ECO Substation Pad site (see Attachment A –Photo 1). CPUC issued an approval letter on September 24th to authorize SDG&E to continue construction activities associated with rough grading as required in Non-Compliance

Report/Temporary Stop Work Order No. 001 (see Weekly Report No. 012). Construction activities associated with rough grading resumed on September 25th. Construction at the ECO Substation site is approximately 39% complete and anticipated to be completed in September 2014.

Construction activities at the 138/230 kV Pad site were monitored by biological, archeological and paleontological monitors in accordance with MM-PALEO-1C, MM-BIO-1C and MM-CUL-1D. In accordance with the Dust Control Plan and MM-BIO-4a crews were observed watering down areas of active construction during the reporting period.

In accordance with MM-HYD-1 trac-out measures consisting of a rock apron and rattle plate were being maintained at the point of ingress/egress to the ECO Substation along Old Highway 80. A CPUC third-party Environmental Compliance Monitor (ECM) notified the lead SDG&E Environmental Inspector (EI) of concerns with dirt and rocks along Old Highway 80 adjacent to the rock apron and rattle plate. SDG&E Lead EI notified construction crews of the concern and crews were observed sweeping the rocks and dirt from the paved roadway surface.

Construction crews were observed placing all trash debris in sealed storage containers in accordance with MM-BIO-7D. Wildlife escape ramps were installed with a gradient ratio of no greater than two to one to prevent wildlife entrapment in accordance with MM-BIO-7A at excavations within the 138/230 KV Substation Pad (see Attachment A –Photo 2).

Portable toilets were equipped with secondary containment in accordance with MM-HYD-1. A third-party ECM identified construction equipment leaking fluids onto soils as a result of containment not being placed beneath the construction equipment when staged along the right-of-way. The lead SDG&E EI was notified and in response construction crews were observed removing the stained soils and placed additional containment bins beneath construction equipment staged onsite.

Water trucks were observed being utilized throughout construction activities to minimize fugitive dust emissions in accordance with the Dust Control Plan and MM-BIO-4A. A third-party ECM notified the lead SDG&E EI of concerns related to excessive dust emissions. The concern was presented by the SDG&E lead EI to the construction contractors and in response additional water was applied to active work areas, which reduced dust emissions to acceptable levels.

Boulevard Substation Rebuild

Construction activities at the Boulevard Rebuild Site consisted of rough grading and excavation of soils to establish the Boulevard Rebuild Substation pad site. Soils excavated from the project site were transported to the ECO Substation located to the east (see Attachment A –Photo 3). Construction is approximately 10% complete and is anticipated to be completed in November 2014.

BMP's consisting of silt fence and straw wattles have been installed along the perimeter of the project site in accordance with the SWPPP and MM-HYD-1. A SWPPP inspector was observed completing

routine inspections to ensure BMP's were being maintained. Trac-out measures consisting of a rattle plate and rock apron have been installed at the point of ingress/egress to the Boulevard Substation Rebuild Site to minimize the potential for trac-out along Old Highway 80 (see Attachment A –Photo 4).

In accordance with MM-TRA-1, a flagger was utilized along Old Highway 80 to ensure safe ingress/egress for haul trucks accessing the Boulevard Rebuild Site. Construction traffic signage has also been placed along Old Highway 80 notifying motorists of construction activities.

Fire patrols were observed onsite during construction activities and completing vehicle inspections to ensure construction equipment and vehicles had the required fire safety equipment in accordance with MM-FF-1.

138 kV Underground Transmission Line

Construction crews have completed construction activities associated with the 138 kV Underground Transmission Line between Old Highway 80 and the ECO Substation. A third-party ECM identified BMP's consisting of gravel bags, straw wattles, and silt fence that were in need of repair. The concern associated with BMP maintenance was presented to the lead SDG&E EI. The lead SDG&E EI indicated repairs were scheduled to be completed during the reporting period; however repairs still remain outstanding. A follow-up will be provided in Weekly Report No. 014.

Construction Yards

Construction crews continued to mobilize construction materials to the Carrizo Gorge Construction Yard and Jewel Valley Construction Yard during this reporting period. Gravel base was observed being placed at the Jewel Valley Construction Yard (see Attachment A –Photo 5). Clearing of vegetation at the Domingo Lake Construction Yard commenced during the reporting period. A biological monitor was present overseeing vegetation removal in accordance with MM-VEG-1C (see Attachment A –Photo 6). A Non-Compliance was reported by SDG&E on September 24, 2013 as a result of construction crews clearing vegetation beyond the approved work limits at the Domingo Lake Construction Yard (see Compliance section below).

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

SDG&E submitted Non Compliance Report No. 003 to the CPUC on September 25, 2013 following vegetation clearing being completed beyond the approved work limits at the Domingo Lake Construction Yard. A biological monitor was present as required in MM-BIO-1C and the work limits

had been staked prior to vegetation removal; however the limits of work was not correctly interpreted by the construction crews and biological monitor. An approximately 300 square foot area was impacted beyond the approved work limits. In response to Non Compliance Report No. 003, SDG&E will be implementing the following corrective measures to minimize the potential from a similar incident occurring in the future (1) Stakes will be flagged with different colors for delineating work limits vs offset stakes, (2) Construction personnel will walk the limits prior to clearing to identify the authorized work limits, (3) Rope will be strung between work limits staking to clearly delineate the approved work limits.

See Attachment D – SDG&E Non-Compliance Report No. 003.

The CPUC issued a letter to SDG&E on September 24th authorizing ground disturbing activities at the ECO Substation site to resume. The letter issued by CPUC stated that both the ECO Substation Pad Site Archeological Monitoring Plan and Archeological Monitoring Communication and Reporting Protocol met the corrective active requirements identified in Temporary Stop Work Order No. 001 (see Weekly Report No. 012).

See Attachment E – CPUC Authorization to Resume Work

CONSTRUCTION PROGRESS

Boulevard Substation Rebuild Site

All abatement activities at the Boulevard Substation Rebuild Site have been completed. Construction crews have completed demolishing existing structures and initiated rough grading to establish the substation pad.

ECO Substation Site Construction

SDG&E began clearing, grubbing, and grading activities associated with the ECO Substation site on March 11, 2013. Construction crews have completed fine grading at the 138/230 kV substation pad site and rough grading activities continue at the 500 kV substation pad site.

138 kV Underground Construction

SDG&E completed the 138 kV Underground Transmission Line between the ECO Substation and Old Highway 80.

Construction Yards

SDG&E has cleared vegetation, installed perimeter fencing and begun mobilizing construction equipment and materials at the Carrizo Gorge Construction Yard 1 and 2 and Jewell Valley Construction Yard. Clearing vegetation at the Domingo Lake Construction Yard was initiated during this reporting period.

Geotechnical Investigations

All geotechnical investigations authorized by CPUC NTP No. 003, No. 004, and BLM NTP No. 001 to conduct 24 geotechnical borings were completed as of March 14, 2013.

CONSTRUCTION SCHEDULE

ECO Substation 500 kV and 230/138 kV Yards –SDG&E began construction activities on March 11, 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 October 2014.

138 kV Transmission Line –SDG&E has completed construction activities associated with the underground portion of the 138 kV transmission line between Old Highway 80 and the ECO Substation. SDG&E is anticipated to complete construction in October 2014.

Boulevard Substation Rebuild –SDG&E began abatement activities on December 31, 2012 and is anticipated to complete construction in November 2014.

ATTACHMENT A Photos



Photo 1: Construction crews completing concrete foundations for substation components at the 138/230 kV ECO Substation pad.



Photo 2: Wildlife escape ramps being utilized at the 138/230 kV ECO Substation pad site to prevent wildlife entrapment in accordance with MM-BIO-7A.

ATTACHMENT A (Continued)



Photo 3: An excavator is utilized to load haul trucks to export soil from the Boulevard Substation Rebuild Site.



Photo 4: Trac-out measures consisting of a rattle plate and rock apron are being maintained at the point of ingress/egress to the Boulevard Substation Rebuild Site along Old Highway 80.

ATTACHMENT A (Continued)



Photo 5: Gravel base being delivered to the Jewel Valley Construction Yard that will be utilized to stage construction equipment and materials.



Photo 6: Biological monitors present during vegetation clearing at the Domingo Lake Construction Yard in accordance with MM-BIO-1C.

ATTACHMENT B Notices to Proceed

NTP No.	Date Issued	Description	Conditions Included (Y/N)
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
CPUC - 001	November 30, 2012	Abatement activities at the Boulevard Substation rebuild site.	Y
CPUC - 002	February 1, 2013	Construction of a new substation (a 500 kV yard and a 230/138 kV yard).	Y
CPUC - 003	February 1, 2013	Geotechnical Activities.	Y
CPUC - 004	March 4, 2013	Geotechnical Activities.	Y
CPUC - 005	May 21, 2013	Construction Yards	Y
CPUC-006	July 2, 2013	138 kV Underground Transmission Line along Southern Access Road	Y
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	Y
CPUC-009	September 25, 2013	138 kV Underground Transmission Line from Boulevard Substation to 138 kV Overhead Transmission Line	Y

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

ATTACHMENT D
SDG&E Non-Compliance Report No. 003



East County Substation Project

Non-Compliance Report #3

September 25, 2013

Activity Summary

On September 24, 2013, at approximately 1600, Natalie Uriarte (Environmental Inspector [EI], Insignia Environmental) observed that Sukut Construction conducted work outside of the staked limits of the Domingo Lake Construction Yard (Yard). At approximately 1620, the EI notified Steve Diaz (Lead Environmental Inspector [LEI], Insignia Environmental) and Jeffry Coward (Environmental Field Supervisor [EFS], Insignia Environmental) that during mowing of the Yard, work occurred outside of the limits of the approved workspace for the Yard, as described and approved by Minor Project Refinement #2 and Notice to Proceed #5. An approximately 10-foot by 20-foot portion of the vegetation removal that occurred along the outside southwestern edge of the Yard was within the disturbance limits of the Section 1 138 kilovolt (kV) Underground Alignment right-of-way (ROW). The NTP request for Section 1 was submitted to the California Public Utilities Commission (CPUC) on August 30, 2013 but had not yet been approved at the time of the off-ROW activity. In addition, an area approximately 10 feet by 10 feet was mowed that was outside of the work limits of both the Yard and Section 1 ROW.

The EFS and LEI met with Kirstie Reynolds (Environmental Compliance Lead, SDG&E) at approximately 1650 to discuss the incident. It was determined that the Section 1 ROW limits and the Yard limits were staked and flagged with the same color ribbon causing the equipment operator to misinterpret the staked limits for the yard with the staked limits for the Section 1 underground alignment. In addition, offset staking was utilized as a portion of the yard overlaps with the adjacent dirt access road. Offset staking was used to avoid installing stakes in the middle of the road bed. This offset stake was mistaken for the proper Yard "construction limits" stake causing a more acute angle and resulting in the off-ROW activities. Approximately seven big sage brush (*Artemisia tridentata*) within an approximately 300-square-foot area were impacted.

Amy Baker (Project Manager, CPUC) and David Hochart (Environmental Compliance Manager, CPUC/Dudek) were notified by Kirstie Reynolds via telephone of the incident at approximately 1700.

Resource Assessment

The LEI conducted an investigation of the impacted area outside of the work limits on September 24, 2013. Approximately 200 square feet of native big sage brush scrub was mowed outside of the Yard limits but within the Section 1 ROW, and approximately 100 square feet of big sage brush scrub was mowed outside of the Yard limits and the Section 1 ROW limits. The root systems remained intact, and little soil disturbance occurred. The impacted area is located more than 100 feet away from any known cultural Environmentally Sensitive Area. No rare plant species were impacted, and no drainages under the jurisdiction of the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, or Regional Water Quality Control Board were disturbed.

Compliance Summary

The mowing that occurred outside of the Yard was conducted in a location that had not been authorized by Minor Project Refinement #2 (approved by the CPUC on May 20, 2013) nor NTP #5 - Construction Yards issued by the CPUC on May 20, 2013. This incident was documented as a Non-Compliance as there was minor resource damage to a native vegetation community (big sage brush scrub) outside of the approved work limits. Mitigation Measure BIO-1a of the Project's Mitigation Monitoring, Compliance, and Reporting Program requires that all construction-related activities be limited to approved work limits.

Corrective Action and Follow-Up

A follow-up meeting will be held between SDG&E and its Contractors within one week (by October 1, 2013) to review Quality Control/Quality Assurance procedures intended to ensure that staking is confirmed and easily decipherable by construction personnel in the field prior to clearing or grading activities. SDG&E's Contractors will also evaluate the existing procedures for adequacy, assess if any procedures were not properly implemented, and develop new procedures, as necessary, within one week (by October 1, 2013) to minimize the potential for a similar incident to occur in the future.

Photographs



Photograph 1: View facing west of the area of disturbance outside of the approved limits for the Yard but within the Section 3 ROW.



Photograph 2: View facing southwest of the area of disturbance outside of the approved limits for the Yard and the Section 3 ROW.

ATTACHMENT **E**
CPUC Authorization to Resume Work

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 24, 2013

Mr. Don Houston
Project Manager II, Environmental Services
San Diego Gas & Electric
1010 Tavern Road
Alpine CA, 91901

Subject: CPUC approval to resume all ground disturbing activities at the East County Substation 138/230 and 500 kV substation pad sites

Dear Mr. Houston:

On September 8, 2013, the CPUC issued Temporary Stop Work Order (TSWO) #1 for all ground disturbing activities at the East County Substation 138/230 and 500 kV substation pad sites. The TSWO was the result of SDG&E's failure to effectively implement MM-CUL-1D, which states the following:

Prior to issuance of grading permit(s), SDG&E shall retain a qualified archaeologist, in accordance with the Secretary of the Interior's Standards and Guidelines (Secretary's Standards) (36 CFR 61), and Native American observer to monitor ground-disturbing activities in culturally sensitive areas in an effort to identify any unknown resources... All construction activities in environmentally sensitive areas, or any other area of the project deemed sensitive for containing cultural resources, shall be monitored by a qualified archaeologist. Since significant portions of the project site contain sedimentary deposits that have the potential to contain buried cultural resources, then full-time cultural resources monitoring shall be implemented during all phases of ground-disturbing work in these areas.

The TSWO required that SDG&E complete the following corrective actions:

- ECO Substation Pad Site Archeological Monitoring Plan – SDG&E shall develop an Archeological Monitoring Plan that will provide steps to be implemented during the day-to-day monitoring program at the ECO Substation pad site. The Archeological Monitoring Plan at a minimum should identify how SDG&E will balance safety concerns while ensuring archeological monitors are able to effectively monitor all initial ground disturbance activities.
- Archeological Monitoring Communication and Reporting Protocol – SDG&E shall develop an Archeological Monitoring Communication and Reporting Protocol that identifies all responsible parties for ensuring compliance with archeological

Don Houston
September 24, 2013

measures and the associated chain of command. At a minimum the Archeological Monitoring Communication and Reporting Protocol should include an archeological deliverables distribution list and a field communication protocol.

This letter documents the CPUC has reviewed both the ECO Substation Pad Site Archeological Monitoring Plan & Archeological Monitoring Communication and Reporting Protocol and has determined corrective actions identified in TWSO #1 have been met by SDG&E. SDG&E is authorized to resume ground disturbing activities at the ECO Substation 138/230 and 500 kV substation pad sites.

Sincerely,

/s/ Amy Baker

Amy Baker

CPUC Environmental Project Manager

cc: *M. Hale, Dudek*
D. Hochart, Dudek
B. Williams, ASM
K. Reynolds, SDG&E
N. Morgan, SDG&E
C. Simmons, BLM
J. Sahagun, BLM
B. Paul, BLM