

PROJECT MEMORANDUM SYCAMORE-PEÑASQUITOS 230-KV TRANSMISSION LINE PROJECT

Date: June 12, 2017

To: Billie Blanchard, CPUC Project Manager
From: Sheila Hoyer, CPUC Monitoring Supervisor

Subject: Weekly Report #22 – May 30 to June 2, 2017

INTRODUCTION

This report provides a summary of the construction and compliance activities associated with the SDG&E Sycamore-Peñasquitos 230-kV Transmission Line Project for the week of May 30 to June 2, 2017.

A summary of the Notices to Proceed, and Minor Project Refinement, and Temporary Extra Workspace Requests are provided in Tables 1, 2, and 3, respectively. A summary of Noncompliance, Project Memoranda and Incidents is provided in Table 4. Daily Inspection Reports are provided in Appendix A.

CPUC/Panorama Environmental Monitors (EMs): Jerry Scott and Korey Klutz

STAGING YARDS

Summary of Activity:

Stonebridge Staging Yard:

1. Delivering materials and equipment, and maintaining BMPs.

Driving Range Staging Yard:

1. Maintaining BMPs, and delivering materials and equipment.

Underground Transmission Line:

- 1. Construction occurred in Segment 5 along sections 4, 5, 6, 7, 9, 11, 15 and 16 (approximately at stations 60+00 to 260+00).
- 2. Saw cutting for trench and vaults, installing vaults and conduit, potholing to locate existing utilities, laying asphalt, maintaining BMPs, and installing storm drain inlet protection.

Environmental Compliance:

- 1. During this reporting period, all pavement was kept clean. No winds occurred that were higher than 20 mph. All off-road diesel-powered construction equipment used on the Project met a minimum of EPA Tier 3 standards.
- 2. Monitoring for special-status species and inspections for wildlife was implemented to avoid and minimize impacts to biological resources. Construction activities within the Stonebridge Staging Yard and Driving Range Staging Yard were initiated outside of the nesting season, and construction activities remain ongoing. Nest surveys were conducted on May 30 and 31, 2017 in areas for anticipated construction. Daily pre-construction nest monitoring of the red-tailed hawk nest occurred on May 31, June 1 and 2, 2017. Daily pre-construction nest monitoring of the American crow nest and Cassin's kingbird nest occurred on June 1, 2017. On June 1, 2017, the pair of Cassin's kingbirds were observed relocating the nest outside of the project buffer (nest relocation was not caused by construction activities), and as a result of the relocation, the nest is no longer actively monitored. No other nest monitoring occurred during this reporting period. All project equipment arrived clean and free of mud and/or vegetation.
- 3. During this reporting period, archaeological, paleontological, and Native American monitors were on site for ground-disturbing activities in areas with moderate to high potential to encounter resources. Potholing activities continued during the week, both by vacuum method and by backhoe. Under the direction of the CPUC-approved archeologist, spot checking by archaeological and Native American monitors occurred in the trenching excavations which were in disturbed soil/fill material where the potential to encounter historical or archaeological resources was low. Cultural monitoring teams will continue spot-checking and if the soil composition changes, full time monitoring may be recommended by the CPUC-approved archeologist. Additionally, spot checking of the utility relocation at station 154+90 was recommended by the Qualified Paleontologist and the CPUC-approved archaeologist due to the low potential to encounter resources within or near the disturbed trench line. No paleontological or archaeological resources were observed during this reporting period.
- 4. No spills occurred during this reporting period.
- 5. Daytime construction activities during this reporting period were confined to Monday through Friday and occurred between 7:00 a.m. and 5:30 p.m. A noise permit was obtained from the City of San Diego for nighttime construction activities. Nighttime construction activities were confined to Tuesday through Thursday and occurred between 9:00 p.m. and 5:00 a.m.
- 6. Project personnel parked their personal vehicles within a designated personal vehicle parking area within the project limits within the Stonebridge Staging Yard. Workers parked within the work limits of the Driving Range Staging Yard or parked on the adjacent public street.
- 7. During this reporting period, the QSP conducted daily and pre-rain inspections. During sawcutting activities, a vacuum was used to collect excess water and a street sweeper was used to clean up excess sediment/dust. All equipment staged

- along the ROW had drip pans in place to capture oil drips/leaks and all trash facilities were covered daily.
- 8. All construction and compliance personnel on site during this reporting period completed the Project Safety and Environmental Awareness Program (SEAP). To date, approximately 738 Project personnel have received the required SEAP training, and 625 Project personnel have received the UXO training.
- 9. No Compliance Level Incidents occurred during this reporting period.
- 10. No public complaints were received during this reporting period.

Agency Representatives during Construction (other than CPUC EMs): None

CPUC NOTICES TO PROCEED (NTPs)

Table 1 summarizes the CPUC NTP activity for the SDG&E Sycamore-Peñasquitos 230-kV Transmission Line Project to date.

Table 1 CPUC NTPs

NTP #	Date Submitted	Date Issued	Segment #	Description	
1	12/05/16	12/29/16	N/A	Mobilize and begin operations at the construction staging yards.	
2	01/23/17	02/07/17	Segment B	Construct the underground portion of the Project from Sycamore Substation to Structure P03, and from Structure P05 to Structure CC MM CP.	
3	02/03/17	02/27/17	Segment A	Overhead construction from Sycamore Substation to Structure P06	
			Segment C	2. Overhead construction from Structure CC MM CP to the Peñasquitos Substation	
				3. Deepwell AC mitigation installation	
				 Construction activities at Sycamore Canyon and Peñasquitos Substations 	

MINOR PROJECT REFINEMENT & TEMPORARY EXTRA WORKSPACE REQUESTS

Tables 2 and 3 summarize the Minor Project Refinements (MPRs) and Temporary Extra Workspace (TEWS) Requests have been submitted to date.

Table 2 Minor Project Refinement (MPR) Requests

MPR	Date	Date	Segment	Description
Request	Submitted	Issued	#	
#1	12/06/16	1/11/17	Segment A	Underground 230-kV getaway from Sycamore Substation to Structure P03.

MPR Request	Date Submitted	Date Issued	Segment #	Description
#2	01/17/17	01/24/17	Segment B	Realignment of the 230-kV underground transmission line from Miramar Road north on Black Mountain Road and west on Activity Road.
#3	03/06/17	03/08/17	Segment A	Provides temporary power to the SDG&E trailer at the Stonebridge Staging Yard through the existing power box located outside of the existing Project boundary.
#4	04/18/17	04/20/17	Segment B	Modifies the approved 2.61-acre Vulcan Mine Yard location approximately 884 feet to the west to an approximately 1.71-acre paved area.

Table 3 Temporary Extra Workspace (TEWS) Requests

TEWS	Date	Date	Segment	Description
Request	Submitted	Issued	#	
None to date				

NON-COMPLIANCES, PROJECT MEMORANDA & INCIDENTS

No non-compliances, project memoranda or incidents were reported during this reporting period.

Table 4 Non-Compliances, Project Memoranda, and Other Incidents

Туре	Date	Location	Description
Level 1	04/12/2017	Segment B	Potable water was used in a street sweeper
Memoranda	04/19/2017	Segment B	Traffic incident at Driving Range Staging Yard
Level 1	04/24/2017	Segment B	Presence of trash along the project alignment
Level 1	05/01/2017	Segment B	Working outside of City-approved hours
Memoranda	05/03/2017	Segment B	Traffic incident at Snapple/7-Up Plant
Memoranda	05/18/2017	Segment B	Traffic incident at Station 169+89

ATTACHMENT A INSPECTION REPORTS

2017-05-30 PM Inspection Report

SDG&E Sycamore-Peñasquitos 230-kV Transmission Line Project: Daily Inspection Report

Inspection Date 2017-05-30 Start Time 19:45:00 **End Time** 23:45:00 Monitor Name Jerry Scott

Organization The Sanberg Group (Sanberg)

Summary of Construction Activities

Crews are potholing, excavating, trenching, and doing asphalt work. Steel plates being removed and installed. Dump trucks hauling away fill. Continuing installation of the vault.

Summary of Compliance Activities

Adequate lighting was in place and facing downward. All traffic flaggers and signage etc. were in place. BMPs were in place and in good working order.

Were any issues encountered?

Photo Log

Photo



Caption Potholing.

Capture Date/Time: Tue May 30 2017 23:57:36 GMT-0700 (PDT) Coordinates: 32.889120, -117.157681 Photo Attributes

View Direction: North



Caption Vault work being done.

Photo Attributes Capture Date/Time: Tue May 30 2017 22:59:00 GMT-0700 (PDT) Coordinates: 32.895542, -117.143634

View Direction: Northeast

Photo



Caption All BMPs in place and in good working order.

Photo Attributes Capture Date/Time: Tue May 30 2017 21:57:09 GMT-0700 (PDT) Coordinates: 32.888691, -117.165148 View Direction: Southeast



Caption Excavating with no dust being created.

Photo Attributes Capture Date/Time: Tue May 30 2017 21:53:59 GMT-0700 (PDT)

Coordinates: 32.888798, -117.165401

View Direction: Southwest

Photo



Caption Traffic flagger at work with ample lighting in place.

Capture Date/Time: Tue May 30 2017 21:44:47 GMT-0700 (PDT) Coordinates: 32.889288, -117.155225 Photo Attributes

View Direction: Southwest

Daily Checklist

Q1 - General Avoidance and Minimization: (a) Were the limits of work areas and access roads clearly marked? (b) Were construction activities limited to CPUC-approved work areas?

Q1 Notes

Q2 - Air Quality/GHG: (a) Were dust avoidance and minimization requirements implemented and monitored adequately? (b) Was dust generation below required thresholds? (c) Were equipment

Met Requirements

All work areas are clearly marked and within CPUC-approved limits.

and vehicles maintained and operated in a manner to limit emissions? (d) Was organic waste collected and separated from non-organic waste for appropriate composting or recycling, as appropriate? Q2 Notes Dust generation was very low and no vehicles were observed idling over the 5-minute limit. Q3 - Special-Status Plants: Were impact avoidance and minimization requirements for special-status plants implemented adequately (e.g., avoiding sensitive areas)? Q3 Notes No special-status plants in tonight's work areas. Q4 - Wildlife (Non-Avian): Were impact avoidance and Met Requirements minimization requirements for wildlife implemented adequately (e.g., avoiding sensitive areas, covering excavations, and inspecting equipment/trenches)? Q4 Notes All trenches were covered when not in use and were inspected by the monitors on site. Q5 - Nesting and Burrowing Birds: (a) Were active nests and Met Requirements occupied burrows identified and monitored during applicable seasons, as required? (b) Were impact avoidance and minimization requirements for any active nests or occupied burrows implemented adequately? Q5 Notes All nesting buffers were in place and monitored by the bios in order to remain in compliance. Q6 - Water Features and Aquatic Habitat: Were water features avoided? Q6 Notes No water features within the work areas. Q7 - Stormwater, Erosion, and Sediment Control: (a) Were erosion Met Requirements and sediment control BMPs in place and functioning properly? (b) Were inactive or completed work areas stabilized and/or restored adequately? Q7 Notes All BMPs were in place and properly maintained. Q8 - Invasive Weed Control: Were procedures to prevent the Met Requirements spread of invasive weeds implemented adequately? Q8 Notes Steel shaker plates are installed at the entrance to the maintenance vard. Q9 - Hazardous Materials and Waste Management: (a) Were Met Requirements hazardous materials stored and labeled properly? (b) Was hazardous material waste disposed of appropriately? (c) Were any spills or leaks addressed adequately? (d) Was solid waste collected and disposed of adequately? Q9 Notes All hazardous materials are clearly labeled and stored within secondary containment. Q10 - Fire Management: (a) Were fire prevention procedures in Met Requirements place? (b) Was firefighting equipment available on site? Q10 Notes All fire prevention measures were in place. Q11 - Cultural, Paleontological, and Tribal Resources: (a) Were Met Requirements cultural, paleontological, and tribal resources monitoring and impact avoidance occurring as required? (b) If potential resources or human remains were inadvertently discovered, were response procedures and protocols implemented as required? Q11 Notes All monitors were in place and no human remains reported. Q12 - Construction Noise: (a) Were noise minimization measures Met Requirements in place, as required? (b) If noise complaints were received, were they documented and addressed, as required? Q12 Notes Construction noise was kept to a minimum. Q13 - Maintain Access: (a) Was access to driveways (e.g. Met Requirements businesses, schools, residences) maintained as required? (b) Was access to recreational areas maintained and appropriate signage installed? (c) Was pedestrian and bicycle access maintained, or were detours clearly defined? Q13 Notes Access to local business and driveways was maintained throughout Q14 - Traffic Control (a) Were flaggers present at all times? (b) Met Requirements Were barriers, cones, and signs in place? (c) Were detours clearly marked? All traffic flaggers, cones, barriers, signage etc, were in place. Q15 - Helicopter Use (a) Were helicopter use restrictions N/A implemented adequately? (b) Were helicopter take-off and landing sites within prescribed limits? No helicopters in use. Q16 - Worker Training and Communication: Have all workers on Met Requirements

site received the required environmental trainings for the project?

Q16 Notes

Q17 – MMCRP Implementation: (a) Were project activities consistent with the approved project as defined in the EIR and subsequent CPUC authorizations? (b) Were MMCRP procedures implemented adequately?

Q17 Notes

All personnel were properly trained and displayed their training stickers on their hard hats as required.

Met Requirements

All mitigation measures were in place and in practice in order to remain in compliance.

2017-05-31 AM Inspection Report

SDG&E Sycamore-Peñasquitos 230-kV Transmission Line Project: **Daily Inspection Report**

Inspection Date 2017-05-31 Start Time 04:04:00 **End Time** 06:04:00 Monitor Name Jerry Scott

Organization The Sanberg Group (Sanberg)

Summary of Construction Activities The crews were potholing, excavating, trenching and shoring, installing conduit, and asphalt work.

Removing and replacing steel plates, hauling away fill, and street sweeping.

Summary of Compliance Activities

LEI, all monitors, SDG&E representatives, inspectors, and superintendent were on site. All trenches that were opened were inspected and covered when not in use. Access was maintained to local business throughout the night. Dust was kept to a minimum as well as construction noise.

All traffic flaggers, cones, barricades etc. were in place.

Were any issues encountered? No

Photo Log

Photo



Caption Vault construction cleared and street returned to public use.

Photo Attributes Capture Date/Time: Wed May 31 2017 05:47:32 GMT-0700 (PDT)

Coordinates: 32.895770, -117.142198

View Direction: West



Caption Steel plates covering trenches.

Photo Attributes Capture Date/Time: Wed May 31 2017 05:38:26 GMT-0700 (PDT) Coordinates: 32.887525, -117.178097 View Direction: East

Photo



Caption Drip pans in place.

Capture Date/Time: Wed May 31 2017 05:34:39 GMT-0700 (PDT) Coordinates: 32.891189, -117.191711 View Direction: East Photo Attributes



Caption Steel shaker plates at construction yard entrance.

Photo Attributes Capture Date/Time: Wed May 31 2017 05:33:12 GMT-0700 (PDT)

Coordinates: 32.891272, -117.191879

View Direction: Southeast

Photo



Caption Digital signage.

Capture Date/Time: Wed May 31 2017 05:29:25 GMT-0700 (PDT) Coordinates: 32.889768, -117.200355 Photo Attributes

View Direction: Northeast

Daily Checklist

Q1 - General Avoidance and Minimization: (a) Were the limits of work areas and access roads clearly marked? (b) Were construction activities limited to CPUC-approved work areas?

Q1 Notes

Q2 – Air Quality/GHG: (a) Were dust avoidance and minimization requirements implemented and monitored adequately? (b) Was dust generation below required thresholds? (c) Were equipment

Met Requirements

Work areas were clearly marked and within CPUC-approved areas.

and vehicles maintained and operated in a manner to limit emissions? (d) Was organic waste collected and separated from non-organic waste for appropriate composting or recycling, as appropriate? Q2 Notes Dust was at a minimum and no vehicles were observed idling over the 5-minute limit. Q3 - Special-Status Plants: Were impact avoidance and N/A minimization requirements for special-status plants implemented adequately (e.g., avoiding sensitive areas)? Q3 Notes No special-status plants. Q4 - Wildlife (Non-Avian): Were impact avoidance and Met Requirements minimization requirements for wildlife implemented adequately (e.g., avoiding sensitive areas, covering excavations, and inspecting equipment/trenches)? All trenches were covered when not in use. Q5 - Nesting and Burrowing Birds: (a) Were active nests and Met Requirements occupied burrows identified and monitored during applicable seasons, as required? (b) Were impact avoidance and minimization requirements for any active nests or occupied burrows implemented adequately? Q5 Notes Bird buffers were in place. Q6 - Water Features and Aquatic Habitat: Were water features N/A avoided? Q6 Notes No water features Q7 - Stormwater, Erosion, and Sediment Control: (a) Were erosion Met Requirements and sediment control BMPs in place and functioning properly? (b) Were inactive or completed work areas stabilized and/or restored adequately? Q7 Notes All BMP's were in place and well maintained. Q8 - Invasive Weed Control: Were procedures to prevent the Met Requirements spread of invasive weeds implemented adequately? Q8 Notes Steel shaker plates installed Q9 - Hazardous Materials and Waste Management: (a) Were Met Requirements hazardous materials stored and labeled properly? (b) Was hazardous material waste disposed of appropriately? (c) Were any spills or leaks addressed adequately? (d) Was solid waste collected and disposed of adequately? Q9 Notes All hazardous materials were clearly marked and properly stored. Q10 - Fire Management: (a) Were fire prevention procedures in Met Requirements place? (b) Was firefighting equipment available on site? All fire preventative measures were in place. Q11 - Cultural, Paleontological, and Tribal Resources: (a) Were Met Requirements cultural, paleontological, and tribal resources monitoring and impact avoidance occurring as required? (b) If potential resources or human remains were inadvertently discovered, were response procedures and protocols implemented as required? All monitors were on site and no human remains reported. Q12 - Construction Noise: (a) Were noise minimization measures Met Requirements in place, as required? (b) If noise complaints were received, were they documented and addressed, as required? Q12 Notes No noise complaints were reported Q13 - Maintain Access: (a) Was access to driveways (e.g., Met Requirements businesses, schools, residences) maintained as required? (b) Was access to recreational areas maintained and appropriate signage installed? (c) Was pedestrian and bicycle access maintained, or were detours clearly defined? All access to local business and driveways were maintained Q13 Notes throughout the evening. Q14 - Traffic Control (a) Were flaggers present at all times? (b) Met Requirements Were barriers, cones, and signs in place? (c) Were detours clearly marked? Q14 Notes All traffic flaggers, cones, barriers, signage etc. were in place. Q15 - Helicopter Use (a) Were helicopter use restrictions N/A implemented adequately? (b) Were helicopter take-off and landing sites within prescribed limits? Q15 Notes No helicopters in use. Q16 - Worker Training and Communication: Have all workers on Met Requirements site received the required environmental trainings for the project?

their hard hats as required.

All personnel were properly trained and displayed their stickers on

Q16 Notes

Q17 – MMCRP Implementation: (a) Were project activities consistent with the approved project as defined in the EIR and subsequent CPUC authorizations? (b) Were MMCRP procedures implemented adequately?

Met Requirements

Q17 Notes

All mitigation measures were in place and observed.

2017-06-01 PM Inspection Report

SDG&E Sycamore-Peñasquitos 230-kV Transmission Line Project: Daily Inspection Report

 Inspection Date
 2017-06-01

 Start Time
 20:00:00

 End Time
 23:35:00

 Monitor Name
 Korey Klutz

Organization The Sanberg Group (Sanberg)

Summary of Construction Activities Construction included trenching on Carroll and Trade and vaults at the bookends of Trade and

Miralani Dr.

Summary of Compliance Activities LEI and monitors onsite ensuring compliance.

Observed an incident at approximately 2020 along Trade Place where a motorcycle was traveling west into oncoming traffic. This location was setup for one way traffic. The motorcycle avoided the oncoming vehicles. Traffic control was in place and when questioned they stated the

motorcycle did not obey their directions.

Were any issues encountered? No

Photo Log

Photo



Caption Excavation on Carroll Rd. (western edge)

Photo Attributes Capture Date/Time: Thu Jun 01 2017 23:13:13 GMT-0700 (PDT)

Coordinates: 32.892459, -117.187204

View Direction: Northwest



Caption Work along Carroll Rd.

Photo Attributes Capture Date/Time: Thu Jun 01 2017 23:09:13 GMT-0700 (PDT)
Coordinates: 32.886456, -117.174401
View Direction: Southeast

Photo



Caption Western edge of Trade Place.

Photo Attributes Capture Date/Time: Thu Jun 01 2017 23:03:07 GMT-0700 (PDT) Coordinates: 32.888794, -117.161119 View Direction: East



Caption Two lanes now clearly marked at Miralani Dr.

Photo Attributes Capture Date/Time: Thu Jun 01 2017 22:54:50 GMT-0700 (PDT) Coordinates: 32.895891, -117.138659

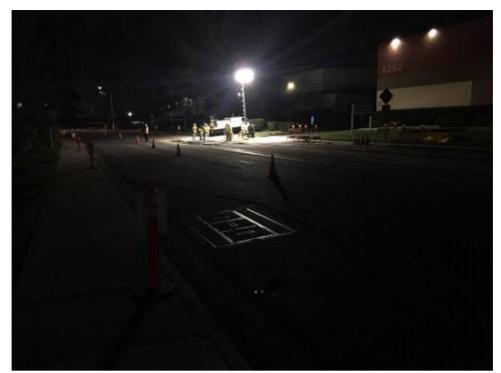
View Direction: East

Photo



Caption Westward traffic is crossing over the center divide. Tight lane west bound, approximately 10 feet wide next to shoring.

Capture Date/Time: Thu Jun 01 2017 22:03:35 GMT-0700 (PDT) Coordinates: 32.895997, -117.138305 View Direction: West Photo Attributes



Caption Miralani Dr.

Photo Attributes Capture Date/Time: Thu Jun 01 2017 21:47:13 GMT-0700 (PDT)

Coordinates: 32.895616, -117.142859

View Direction: West

Daily Checklist

Q1 – General Avoidance and Minimization: (a) Were the limits of work areas and access roads clearly marked? (b) Were construction activities limited to CPUC-approved work areas?

Q1 Notes

Q2 – Air Quality/GHG: (a) Were dust avoidance and minimization requirements implemented and monitored adequately? (b) Was dust generation below required thresholds? (c) Were equipment and vehicles maintained and operated in a manner to limit emissions? (d) Was organic waste collected and separated from non-organic waste for appropriate composting or recycling, as appropriate?

Q3 – Special-Status Plants: Were impact avoidance and minimization requirements for special-status plants implemented adequately (e.g., avoiding sensitive areas)?

Q4 – Wildlife (Non-Avian): Were impact avoidance and minimization requirements for wildlife implemented adequately (e.g., avoiding sensitive areas, covering excavations, and inspecting equipment/trenches)?

Q5 – Nesting and Burrowing Birds: (a) Were active nests and occupied burrows identified and monitored during applicable seasons, as required? (b) Were impact avoidance and minimization requirements for any active nests or occupied burrows implemented adequately?

Q6 – Water Features and Aquatic Habitat: Were water features avoided?

Q7 – Stormwater, Erosion, and Sediment Control: (a) Were erosion and sediment control BMPs in place and functioning properly? (b) Were inactive or completed work areas stabilized and/or restored adequately?

Q8 – Invasive Weed Control: Were procedures to prevent the spread of invasive weeds implemented adequately?

Q9 – Hazardous Materials and Waste Management: (a) Were hazardous materials stored and labeled properly? (b) Was hazardous material waste disposed of appropriately? (c) Were any spills or leaks addressed adequately? (d) Was solid waste collected and disposed of adequately?

Q10 – Fire Management: (a) Were fire prevention procedures in place? (b) Was firefighting equipment available on site?

Q11 - Cultural, Paleontological, and Tribal Resources: (a) Were

Met Requirements

Work was conducted within approved CPUC limits. Monitors were onsite ensuring compliance.

Met Requirements

N/A

N/A

N/A

N/A

Met Requirements

N/A

Met Requirements

Met Requirements

cultural, paleontological, and tribal resources monitoring and impact avoidance occurring as required? (b) If potential resources or human remains were inadvertently discovered, were response procedures and protocols implemented as required? Q12 – Construction Noise: (a) Were noise minimization measures Met Requirements in place, as required? (b) If noise complaints were received, were they documented and addressed, as required? Q13 – Maintain Access: (a) Was access to driveways (e.g., businesses, schools, residences) maintained as required? (b) Met Requirements Was access to recreational areas maintained and appropriate signage installed? (c) Was pedestrian and bicycle access maintained, or were detours clearly defined? Q14 – Traffic Control (a) Were flaggers present at all times? (b) Met Requirements Were barriers, cones, and signs in place? (c) Were detours clearly marked? Q14 Notes Observed an incident at approximately 2020 along Trade Place where a motorcycle was traveling west into on-coming traffic. This location was setup for one way traffic. The motorcycle did avoid the oncoming vehicles. Traffic control was in place. Q15 - Helicopter Use (a) Were helicopter use restrictions implemented adequately? (b) Were helicopter take-off and landing

sites within prescribed limits?

Q16 – Worker Training and Communication: Have all workers on

site received the required environmental trainings for the project?

Q17 – MMCRP Implementation: (a) Were project activities
consistent with the approved project as defined in the FIR and

Q17 – MMCRP Implementation: (a) Were project activities consistent with the approved project as defined in the EIR and subsequent CPUC authorizations? (b) Were MMCRP procedures implemented adequately?

Met Requirements