

	<p><b>California Public Utilities Commission</b>  <b><i>Mitigation Monitoring, Compliance, and Reporting Program</i></b></p>
	<p><b>East County (ECO) Substation Project</b></p> <p><b>Compliance Status Report: 018</b></p> <p><b>December 8, 2013</b></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 November 25 to December 8, 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, 138 kV Overhead Transmission Line, and ECO Substation. 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***

**Boulevard Substation Rebuild Site**

Construction activities at the Boulevard Substation Rebuild Site consisted of construction of concrete forms for the substation foundations and piers. In addition, construction crews completed the finish-grade of the substation pad and began to prepare for the delivery of transformers.

Concrete washout stations were being utilized by construction crews during foundation pours in accordance with the Stormwater Pollution Prevention Plan (SWPPP) and Mitigation Measure HYD-1 (see photo 1 – Attachment A). In addition, containment bins were observed to be placed under staged equipment, hazardous materials, and portable sanitary facilities.

A fire box containing fire equipment was observed to be maintained on-site at the Boulevard Substation Rebuild Site and fire patrols were on-site during construction activities to provide ongoing fire patrols in accordance with the Construction Fire Prevention Plan (Mitigation Measure FF-1) (see photo 2 – Attachment A).

### 138 kV Underground Transmission Line

Construction activities during this reporting period consisted of excavation, installation, and pouring concrete for underground transmission vaults. Construction crews also began the underground transmission line excavation and conduit installation.

Speed limit signs were observed to be posted along access roads during construction (see photo 3 – Attachment A). In accordance with Mitigation Measure BIO-7b, construction vehicles are not to exceed 15 miles per hour on unpaved roads and the right-of-way accessing the construction site. Third-party environmental compliance monitors observed construction vehicles adhering to the posted speed limits.

Erosion control devices including silt fence and straw wattles have been placed along the limits of work to minimize the potential for pollutants and sediment to be discharged offsite. The erosion control features have been observed to be maintained in accordance with the SWPPP and Mitigation Measure HYD-1. In addition, yellow ropes have been installed to delineate the approved project work limits during construction activities associated with underground transmission line alignment in accordance with Mitigation Measure BIO-1a (see photo 4 – Attachment A).

### 138 kV Overhead Transmission Line

During this reporting period, construction crews continued to install environmentally sensitive area (ESA) fencing in accordance with Mitigation Measures CUL-1a and CUL-1d. Construction crews also were observed clearing vegetation and installing erosion and sediment control devices including energy dissipaters, straw wattles, and silt fencing.

Construction crews were observed grading the pad site for Steel Pole 75. In accordance with the Dust Control Plan and Mitigation Measure BIO-4a, water trucks were observed watering down areas of active construction to prevent fugitive dust (see photo 5 – Attachment A).

Steel Pole 75 was fully erected during this reporting period on Friday, December 6. An Air Crane helicopter was used to set the steel pole due to the weight of the pole and accessibility to the site (see photo 6 – Attachment A).

## ECO Substation

Construction activities at the ECO Substation 500 kV substation pad site consisted of pouring concrete and constructing the control shelter, and delivery and installation of the 500 kV transformers. The transformers were delivered during regular construction hours and flaggers were observed along Old Highway 80 to ensure the safe passage of haul trucks carrying the transformers. In accordance with the Surface Treatment Plan (Mitigation Measure VIS-3g) the control shelter was observed to be constructed with an Otay Ranch Brown colored split faced concrete block (see photo 7 – Attachment A) to reduce glare and minimize visual intrusion and contrast by blending the control shelter with the landscape.

Construction crews at the 230/138 kV substation pad site were observed drilling foundations, constructing fire walls, and erecting the steel A-frames and H-braces on the substation pad. Construction crews were also observed spreading topsoil along the slopes of both the 500 kV and 230/138 kV substation pads and performing routine erosion control maintenance. Erosion control maintenance included the installation of straw wattles to prevent sediment erosion in accordance with the SWPPP and Mitigation Measure HYD-1.

### ***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. 004 to the CPUC on December 3, 2013 to document a non-compliance event that occurred on November 26, 2013. A tracked D-8 bulldozer traveled off the approved access road while mobilizing to Section 2 of the 138 kV Overhead Transmission Line Steel Pole 86 work site. The bulldozer disturbed an area measuring approximately three by six feet that was adjacent to the access road and within an ESA.

In response to Non Compliance Report No. 004, SDG&E has implemented the following corrective measures to minimize the potential for a similar incident occurring in the future: (1) The access road was roped off and additional ESA signs were installed at consistent intervals along the access road. (2) A follow-up meeting was held between SDG&E and its contractors to review mobilization procedures and the importance of remaining within approved work areas and on approved access roads. (3) Extensive tailboard training will be conducted for the operators and other crew personnel that are primarily responsible for the mobilization of heavy equipment to the various work areas associated with the Section 2 138 kV Overhead Transmission Line. (4) ESAs along narrow roads will be delineated, even if ground disturbance is not anticipated, to visually reinforce the importance of all equipment remaining within the limits of existing access roads.

See Attachment D – SDG&E Non-Compliance Report No. 004.

## **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 have completed the finish-grade of the substation pad. Construction activities are approximately 21 percent complete.

### ***ECO Substation Site Construction***

Construction crews have completed fine grading at the 138/230 kV and 500 kV substation pad sites. Construction activities associated with foundation excavations, rebar placement and pouring concrete continued at the 138/230 kV substation pad and construction of the control shelter at the 500 kV substation pad site continued during this reporting period. Construction activities are approximately 55 percent complete.

### ***138 kV Underground Construction***

SDG&E has completed the 138 kV Underground Transmission Line between the ECO substation and Old Highway 80. Construction crews continued to install and maintain erosion control devices along, grading along the right-of-way, and vault excavation and installation during this reporting period.

### ***138 kV Overhead Construction***

SDG&E continued to place ESA fencing along the right-of-way, remove vegetation, install erosion control devices, grade a single steel pole pad, and erect a single steel pole.

## **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. Construction activities are approximately 55 percent complete.

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

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

***Boulevard Substation Rebuild*** – SDG&E began construction in December 2012 and is anticipated to complete construction in November 2014. Construction activities are approximately 21 percent complete.

## ATTACHMENT A Photos



**Photo 1:** A concrete washout is utilized at the Boulevard Substation Rebuild site during concrete pours associated with substation foundations in accordance with MM-HYD-1 and the SWPPP.



**Photo 2:** A Fire Box containing fire equipment is maintained onsite at the Boulevard Substation Rebuild Site in accordance with the Construction Fire Prevention Plan (Mitigation Measure FF-1).

## ATTACHMENT A (Continued)



**Photo 3:** In accordance with MM-BIO-7b, speed limit signage is posted along access roads during construction of the 138 kV underground alignment. Construction vehicles are not to exceed 15 miles per hour on unpaved roads and the right-of-way accessing the construction site.



**Photo 4:** Yellow ropes are utilized to delineate the approved work limits during construction activities associated with the underground alignment in accordance with MM-BIO-1a. BMPs consisting of straw wattles are also placed along the work limits in accordance with MM-HYD-1 and the SWPPP.

## ATTACHMENT A (Continued)



**Photo 5:** Water trucks are utilized during clearing and grading activities associated with steel pole pad sites for the overhead alignment in accordance with MM-BIO-4a.



**Photo 6:** Steel pole 75 was erected during this reporting period. Work activities were observed being completed within the approved work limits as required in MM-BIO-1a.

## ATTACHMENT A (Continued)



**Photo 7:** The control shelter at the ECO substation was observed being constructed with an Otay Ranch Brown-colored split face concrete block in accordance with the Surface Treatment Plan and MM-VIS-3g.



**Photo 8:** BMPs consisting of straw wattles were observed being placed along slopes at the ECO substation site in accordance with the SWPPP and MM-HYD-1.



## ATTACHMENT B Notices to Proceed

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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
CPU -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
CPUC-010	October 17, 2013	138 kV Underground Transmission Line from Carrizo Gorge Road to Steel Pole 91	Y
CPUC-011	November 5, 2013	138 kV Overhead Transmission Line	Y
CPUC-012	November 19, 2013	Fault Investigations at the Southwest Powerlink (SWPL) Loop-In	Y
CPUC-013	December 4, 2013	138 kV Overhead Transmission Line Steel Pole- 105B and Steel Pole-108A	Y

## ATTACHMENT C

### Minor Project Refinement Requests

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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
008	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

ATTACHMENT D  
*SDG&E Non-Compliance Report No. 004*



## East County Substation Project

### Non-Compliance Report #4

December 3, 2013

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#### **Activity Summary**

On November 26, 2013, at approximately 1000, Steve Diaz (Lead Environmental Inspector [LEI], Insignia Environmental [Insignia]) was informed by Dean DiTommaso (Lead Avian Biologist/Environmental Inspector, Insignia) that while mobilizing to the Section 2 138 kilovolt (kV) Overhead Transmission Line steel pole (SP-) 86 work site, a tracked Caterpillar D-8 bulldozer traveled off of the approved access road for the East County Substation Project (Project). The bulldozer disturbed an area measuring approximately three by six feet that was adjacent to the access road.

The location of the off-road incident was within an environmentally sensitive area (ESA). At the time of the incident, the area was not flagged as it was more than 100 feet away from planned ground-disturbing activity at SP-86. The EI contacted the on-site Archaeological Monitor with ASM Affiliates, Inc. to assess whether any resource damage had occurred. This off-road activity was not in compliance with Mitigation Measures (MMs) BIO-1A and CUL-1A, which require all Project activities to occur within the approved work areas or access roads and outside of ESAs.

Upon review of the area by the on-site Archaeological Monitor, it was determined that additional roping and signage would be prudent to avoid additional off-road travel along the access road. The entire access road was roped off and additional ESA signs were installed at consistent intervals along the access road. At approximately 1700, the LEI contacted Marshall Paymard (California Public Utilities Commission [CPUC] Third-Party Environmental Monitor, Dudek) and Ed Iglesias (CPUC Third-Party Archeological Monitor, Dudek) to inform them of the off-road activity and potential encroachment into the ESA that occurred. At approximately 1730, Kirstie Reynolds (Environmental Compliance Lead, San Diego Gas & Electric Company [SDG&E]) contacted, via telephone, Lisa Orsaba (Project Manager, CPUC), David Hochart (Third-Party Project Manager, Dudek), and Keith Carwana (Third-Party Project Manager, Dudek) to inform them of the incident. In addition, Nicole Morgan (Lead Archaeologist, SDG&E) contacted, via telephone, Micah Hale (Third-Party Archaeological Project Manager, Dudek), Jeffrey Sahagun (Archaeologist, Bureau of Land Management [BLM]), and Carrie Simmons (Resource Branch Supervisor, BLM) to report the incident.

#### **Resource Assessment**

The EI and the on-site Archaeological Monitor determined that there was no visible damage to sensitive resources. Approximately 25 square feet of native salt bush scrub was disturbed outside of the access road limits. The root systems remained intact, and little soil disturbance occurred. No rare plant species were impacted and no drainages under the jurisdiction of the United States Army Corps of Engineers, California Department of Fish and Wildlife, or Regional Water Quality Control Board were disturbed.

## **Compliance Summary**

This incident was documented as a non-compliance because there was ground disturbance within an ESA and there was minor damage to a native vegetation community outside of the approved work limits. MMs BIO-1A and CUL-1A of the Project's Mitigation Monitoring, Compliance, and Reporting Program require that all construction-related activities be limited to approved work limits and outside of ESAs.

## **Corrective Action and Follow-Up**

A follow-up meeting will be held between SDG&E and its contractors within one week (by December 6, 2013) to review mobilization procedures and the importance of remaining within approved work areas and on approved access roads. Extensive tailboard training will be conducted for the operators and other crew personnel that are primarily responsible for the mobilization of heavy equipment to the various work areas associated with the Section 2 138 kV Overhead Transmission Line. In addition, ESAs along narrow roads will be roped off, even if ground disturbance is not anticipated, to visually reinforce the importance of all equipment remaining within the limits of existing access roads.

## Photographs



Photograph 1: View facing west of the area of disturbance along the left-hand side of the road.



Photograph 2: View of the area of disturbance outside of the existing road limits.