

January 6, 2020

Mr. Michael Rosauer
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Monthly Report Summary #11 for the Sanger Substation Expansion Project

Dear Mr. Rosauer,

Construction for the Sanger Substation Expansion Project began on November 5, 2018. This report provides a summary of the compliance monitoring activities that occurred during the period from **September 1 to 30, 2019**, for the Sanger Substation Expansion Project in Fresno County, California. Compliance monitoring was performed to ensure that all project-related activities conducted by Pacific Gas & Electric (PG&E) and their contractors comply with the requirements of the Final Initial Study/Mitigated Negative Declaration (Final IS/MND) for the Sanger Substation Expansion Project, as adopted by the California Public Utilities Commission (CPUC) on July 13, 2017.

Table 1 summarizes CPUC-approved Notice to Proceed (NTP) activities to-date for the Sanger Substation Expansion Project, based on activities proposed in PG&E's Notice to Proceed Requests (NTPRs).

Table 1 CPUC-approved NTP Activities for the Sanger Substation Expansion Project

NTP#	Final NTPR Submittal Date	CPUC NTP Issuance Date	Description of Approved Activities
NTP #1	11/1/2018	11/2/2018	Work within both the existing Sanger Substation footprint and the expansion area, including laydown/staging area setup; installation of access driveways, fencing, foundations, substation equipment, and a microwave tower; and installation of two antenna dishes at an off-site location (Fence Meadow Repeater Station).
NTP #2	6/6/2019	6/7/2019	Work within both the existing Sanger Substation footprint and the expansion area, including laydown/staging area setup; installation of pole foundations, installation of poles, power line stringing, removal of pull sites, and restoration of impacted property.

Table 2 summarizes all CPUC-approved Minor Project Refinements (MPRs) to-date for the Sanger Substation Expansion Project.

Table 2 CPUC-approved MPRs for the Sanger Substation Expansion Project

MPR#	Final MPR Submittal Date	CPUC MPR Approval Date	Description of Minor Project Refinement
MPR #001	5/24/2018	6/12/2018	Minor modifications to the placement and types of poles in the "power line reconfiguration" project component to suit engineering refinements that were made after Final IS/MND approval. The

Table 2 CPUC-approved MPRs for the Sanger Substation Expansion Project

MPR#	Final MPR Submittal Date	CPUC MPR Approval Date	Description of Minor Project Refinement
			modifications would occur approximately 2,100 feet west; 750 feet east; and 165 feet south of the existing Sanger Substation footprint. In total, there would be modifications to seven poles.
MPR #002	7/17/2018	7/20/2018	An additional temporary laydown yard/staging area (approximately 974 feet by 112 feet) located north of the retention basin, running north between the western boundary of the substation expansion area and the western boundary of the existing Sanger Substation footprint. This area is owned in fee title by PG&E.
MPR #003	11/13/2018	11/14/2018	Use of an existing water well approximately 100 feet north of approved NTP #1 work areas, within the same parcel as the Sanger Substation footprint. PG&E has obtained permission from the landowner to use this well for a specified timeframe. PG&E will access the well pump by foot, and will obtain water from this well for dust control purposes. MPR #3 adds no additional ground disturbance to the existing disturbance footprint, other than impacts from light foot traffic and temporary ground placement of a water hose.

Project Compliance Incidents

Onsite compliance monitoring by the Ecology and Environment, Inc., member of WSP (hereafter referred to as E & E) compliance team during this reporting period focused on spot-checks of ongoing construction activities. Compliance Monitors Evan Studley and Sam Hopstone visited the Sanger Substation construction site on **September 13 and 26, 2019**. CPUC Compliance Monitoring Reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and applicant proposed measures (APMs) were completed for the site visits. These reports are attached below (Attachment 1).

Overall, the Sanger Substation Expansion Project has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program’s (MMCRP) Compliance Plan. Communication between the CPUC/E & E compliance team and PG&E has been regular and effective; the correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between the CPUC/E & E and PG&E, along with daily schedule updates and database notifications, provided additional compliance information and construction summaries. Furthermore, PG&E’s weekly compliance status reports provided a compliance summary, a description of construction activities that occurred each week, a summary of compliance with MMCRP conditions (MMs/APMs) for biological, cultural and paleontological resources; the Storm Water Pollution Prevention Plan (SWPPP); noise and traffic control; onsite hazards; and the Worker Environmental Awareness Program (WEAP), as well as any non-compliance issues and resolutions, and public complaints and notifications.

Compliance Incidents and Minor Compliance Observations

During the September 2019 reporting period, PG&E did not self-report any compliance incidents, and the CPUC did not issue any compliance incident reports.

Noise Compliance

Mr. Michael Rosauer
January 6, 2020
Page 3

During the September 2019 reporting period, there were no exceedances of the stipulated noise levels.

Public Concerns

No public concerns were reported during September 2019.

Sincerely,

A handwritten signature in black ink, appearing to read 'Silvia Yanez', with a horizontal line extending from the end of the signature.

Silvia Yanez
Project Manager, Ecology and Environment, Inc.

cc:
Michael Calvillo, PG&E
Carie Montero, Parsons
Lincoln Allen, SWCA

ATTACHMENT 1

CPUC COMPLIANCE MONITORING REPORTS

SEPTEMBER 13 AND 26, 2019



Sanger Substation Expansion Project CPUC Compliance Monitoring Report

Project Proponent	PG&E	Report No.	CM-CPUCDG-091319
Lead Agency	California Public Utilities Commission	Date (mm/dd/yy)	09/13/19
CPUC Project Manager	Michael Rosauer	Monitor(s)	Evan Studley
CPUC (E & E) Monitoring Manager	Silvia Yanez	AM/PM Weather	Clear, 97°F, calm
CPUC (E & E) Monitoring Supervisor	Fernando Guzman	Start/End time	12:55-14:05
Project NTP(s)	NTP #2		

SITE INSPECTION CHECKLIST *(Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)*

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all onsite personnel (e.g., construction workers, managers, inspectors, monitors)?	X		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (BMPs) been installed, in accordance with the project's SWPPP?	X		
Are erosion and sediment control measures (BMPs) installed correctly (without apparent deficiencies) and functioning as intended during rain events?	X		
Are measures in place to avoid/minimize mud tracking onto public roadways?	X		
Is dust control being implemented, in accordance with the Dust Control Plan (e.g., access roads watered, haul trucks covered, dirt piles are covered with tarps, pull-outs and streets cleaned on a regular basis)?	X		
Are work areas being effectively watered prior to excavation or grading?	X		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	X		
Equipment	Yes	No	N/A
Are vehicles maintaining speed limits: 15 mph on unpaved roads/10 mph off-road?	X		
Are observed vehicles/equipment arriving onsite clean of sediment/mud and noxious weeds or other plant debris?	X		
Are observed vehicles/equipment turned off when not in use?	X		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	X		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources, as appropriate?	X		
Are observed vehicles, equipment, and construction personnel staying within approved	X		

work areas and on approved roads?			
Are trenches/excavations covered at night, or when not possible, are wildlife escape ramps installed, constructed of earth fill or wooden planks no less than 10 inches wide?	X		
Biology	Yes	No	N/A
Have required preconstruction surveys been completed for biological resources (special status species, raptors and other nesting birds, burrowing owls, San Joaquin kit fox), as appropriate?	X		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, appropriate buffer distance enacted)?	X		
Is project complying with biological monitoring requirements (e.g., if required, are monitors present)?	X		
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features (e.g., is the refueling/maintenance buffer in place within 100 feet of the irrigation ditch)?	X		
Has wildlife (sensitive species or not) been relocated from work areas? If yes, describe below.		X	
Have impacts occurred on adjacent habitat (sensitive or not sensitive)? If yes, describe below.		X	
Did you observe any threatened or endangered species? If yes, describe below.		X	
Have there been any work stoppages for biological resources? If yes, describe below.		X	
Cultural and Paleontological Resources	Yes	No	N/A
Are appropriate buffers/exclusion zones for identified sensitive cultural/paleo resources (e.g. cultural sites) clearly marked and being maintained?			X
Is the project in compliance with cultural/archaeological monitoring requirements (e.g., if required, are monitors present)?	X		
Is the project in compliance with paleontological monitoring requirements (e.g., if required, are monitors present)?	X		
Have there been any work stoppages for potential archaeological, cultural, or paleontological resources? If yes, describe below.		X	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used onsite properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		
Are required fire prevention and control measures in place, and no crew members, managers, or monitors are smoking onsite?	X		
Are contaminated soils properly managed for onsite storage or offsite disposal?	X		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	X		
Is construction occurring within approved work hours?	X		

Are required noise control measures in place?	X		
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AREAS MONITORED Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.

DESCRIPTION OF OBSERVED ACTIVITIES

12:55 PM- Arrived on site through north gate. Observed rumble strip was actively swept clean between soil dump truck arrivals and departures. Signed JHS and checked in with AJ Excavation foreman Gary Edwards. Met Chennie Castañon, who explained Jeff Clarkson will be off site for a few weeks and Ted Boyett is acting civil inspector for PGE until then. No biological resources were encountered during sweeps, and bird nesting season will be over on Sep 15th. Recent activities included more TSP foundations completed, V-ditch on south and western project boundary concrete forms set, microwave tower installed, and the southeast retention pond freshly bladed. Current activities include forming the V-ditch along western project boundary, off-hauling soil, and pulling wire through underground and pole conduits. Future work planned includes installing shotcrete in the v-ditches, completing BMPs in preparation for wet season, and installing TSPs.

During the inspection, Soar Environmental observed frequent rounds throughout the Site by the water truck; soil and soil stockpiles experienced dust relief as well. All open pits have been coned and roped off for safety.

- 13:30: Check SWPPP binder for most current reports;
- 13:35 Met Ted Boyett, reviewed current and future planned activities;
- 13:45 Checked in with Chennie Castanon;
- 14:05 Exited site through north gate.

The inspector observed no apparent non-compliance activities during the inspection. During the inspection, all SWPPP BMPs were in place and functioning as intended, work crews were seen observing safe practices, and the construction area was well delineated.

NEW SENSITIVE RESOURCE DISCOVERIES

MITIGATION MEASURES VERIFIED

APM AES-3, APM AIR-1, MM BIO-3, APM GEO-2/APM WQ-1, APM NOI-4, MM TRAN-1

See additional APMs and MMs listed in the description of observed activities section.

RECOMMENDED FOLLOW-UP

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS

COMPLIANCE SUMMARY Below please describe any Compliance Incidents (Level 1, 2, or 3) that have occurred since your last visit. If you observe a compliance issue in the field, please note this on this monitoring form. In addition, Level 1, 2 or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.

- Level 0 Acceptable.** (*no compliance incidents*)
- Level 1: Minor Problem.** An event or observation that slightly deviates from project requirements, but does not put a resource at unpermitted risk. If you checked this box, describe the incident below and fill out a separate Compliance Incident Form.
- Level 2: Compliance Deviation.** An event or observation that deviates from project requirements and puts a resource at risk, or shows a trend toward placing resources at risk, but is corrected without affecting the resource. Repeated Level 1 Minor Problems left unaddressed may also rise to a Level 2 Compliance Deviation. If box is checked, summarize below and fill out a separate Compliance Incident Form.
- Level 3: Non-Compliance.** An event or observation that violates project requirements and affects a resource.

Repeated Level 2 Compliance Deviations left unaddressed may also rise to a Level 3 Incident. An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the MMCRP applicant proposed measures (APMs) or mitigation measures (MMs), permit conditions, or approval requirements (e.g. minor project changes, notice to proceed), and/or violates local, state, or federal law. If box is checked, summarize below and fill out a separate Compliance Incident Form.

Compliance Incidents reported by PG&E's Compliance Team

PG&E's Compliance Team reported Compliance Incidents since last CPUC Compliance Monitor visit. If boxed checked, describe issues and resolution status below.

Description: *(include PG&E's report number)*

New Sensitive Resources

New biological, environmental, cultural/archaeological, or paleontological discovery requiring compliance with mitigation measures, permit conditions, etc., has occurred since last CPUC Compliance Monitoring visit. If checked, please describe the new discoveries and documentation/verification below.

Description: None.

Date	Level	Compliance Incident and Resolution	Relevant Mitigation Measure	Corresponding Level 1, 2, or 3 Report #

PREVIOUS COMPLIANCE INCIDENTS OR ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
09/13/19	Expansion Footprint		Photo 1- Soil stockpiles are being transported offsite. No visible dust was observed during soil transportation activities. View north
09/13/19	Expansion footprint		Photo 2- Portable restrooms appear well maintained, trashcans with fastenbale lids observed, no trash observed onsite. View northwest.
09/13/19	Expansion footprint		Photo 3- Conduit trench and associated foundations being constructed. View south.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
09/13/19	Expansion footprint		Photo 4- Drainage swale being constructed along western edge of expanded footprint. Laydown yard at right. View south.
09/13/19	Southeast basin		Photo 5- Newly graded infiltration pond. Bottom and sides have been recontoured. View southwest.

Completed by:	Evan Studley
Firm:	Soar Environmental Consulting, Inc.
Date:	09/13/19
Reviewed by:	Patrick Sauls
Firm:	Soar Environmental Consulting, Inc.
Date:	09/19



Sanger Substation Expansion Project CPUC Compliance Monitoring Report

Project Proponent	PG&E	Report No.	CM-CPUCDG-092619
Lead Agency	California Public Utilities Commission	Date (mm/dd/yy)	09/26/19
CPUC Project Manager	Michael Rosauer	Monitor(s)	Evan Studley, Sam Hopstone
CPUC (E & E) Monitoring Manager	Silvia Yanez	AM/PM Weather	Clear, 96°F, calm
CPUC (E & E) Monitoring Supervisor	Fernando Guzman	Start/End time	14:00-14:50
Project NTP(s)	NTP #2		

SITE INSPECTION CHECKLIST *(Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)*

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all onsite personnel (e.g., construction workers, managers, inspectors, monitors)?	X		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (BMPs) been installed, in accordance with the project's SWPPP?	X		
Are erosion and sediment control measures (BMPs) installed correctly (without apparent deficiencies) and functioning as intended during rain events?	X		
Are measures in place to avoid/minimize mud tracking onto public roadways?	X		
Is dust control being implemented, in accordance with the Dust Control Plan (e.g., access roads watered, haul trucks covered, dirt piles are covered with tarps, pull-outs and streets cleaned on a regular basis)?	X		
Are work areas being effectively watered prior to excavation or grading?	X		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	X		
Equipment	Yes	No	N/A
Are vehicles maintaining speed limits: 15 mph on unpaved roads/10 mph off-road?	X		
Are observed vehicles/equipment arriving onsite clean of sediment/mud and noxious weeds or other plant debris?	X		
Are observed vehicles/equipment turned off when not in use?	X		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	X		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources, as appropriate?	X		
Are observed vehicles, equipment, and construction personnel staying within approved	X		

work areas and on approved roads?			
Are trenches/excavations covered at night, or when not possible, are wildlife escape ramps installed, constructed of earth fill or wooden planks no less than 10 inches wide?	X		
Biology	Yes	No	N/A
Have required preconstruction surveys been completed for biological resources (special status species, raptors and other nesting birds, burrowing owls, San Joaquin kit fox), as appropriate?	X		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, appropriate buffer distance enacted)?	X		
Is project complying with biological monitoring requirements (e.g., if required, are monitors present)?	X		
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features (e.g., is the refueling/maintenance buffer in place within 100 feet of the irrigation ditch)?	X		
Has wildlife (sensitive species or not) been relocated from work areas? If yes, describe below.		X	
Have impacts occurred on adjacent habitat (sensitive or not sensitive)? If yes, describe below.		X	
Did you observe any threatened or endangered species? If yes, describe below.		X	
Have there been any work stoppages for biological resources? If yes, describe below.		X	
Cultural and Paleontological Resources	Yes	No	N/A
Are appropriate buffers/exclusion zones for identified sensitive cultural/paleo resources (e.g. cultural sites) clearly marked and being maintained?			X
Is the project in compliance with cultural/archaeological monitoring requirements (e.g., if required, are monitors present)?	X		
Is the project in compliance with paleontological monitoring requirements (e.g., if required, are monitors present)?	X		
Have there been any work stoppages for potential archaeological, cultural, or paleontological resources? If yes, describe below.		X	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used onsite properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		
Are required fire prevention and control measures in place, and no crew members, managers, or monitors are smoking onsite?	X		
Are contaminated soils properly managed for onsite storage or offsite disposal?	X		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	X		
Is construction occurring within approved work hours?	X		

Are required noise control measures in place?	X		
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<p>AREAS MONITORED Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.</p>
<p>DESCRIPTION OF OBSERVED ACTIVITIES</p> <p>14:00 PM- Arrived on site through north gate. Observed that wattles have been trenched in and sandbagged along western fence, and the ends of the wattles turned upslope to contain flows. Checked in with Gary Edwards signed AJ Excavation JHA, and met acting PG&E civil inspector Ted Boyett, who provided a construction progress update. No biological resources were encountered during sweeps (MM BIO-2), and bird nesting season ended on September 15. Current activities include forming the concrete V-ditches along the west and southern boundaries, forming the concrete slope of the southwest basin, and off-hauling soil. Future work planned includes installing shotcrete in the V-ditches, completing BMPs in preparation for wet season (APM GEO-2/APM WQ-1), and installing TSPs.</p> <p>14:15 PM- Began site walk, headed south along west boundary of expansion footprint. Noted that off-road equipment that leak oil have a drip pan, concrete curing compounds were secondarily contained, and portable toilets were contained as well (APM HAZ-1).</p> <p>14:20 PM- Entered trailer, checked SWPPP. Noted that the SWPPP specifies that wattles shall be staked in, not sandbagged.</p> <p>14:25 PM- Headed west along southern boundary of expansion footprint to southwest basin. Observed crews preparing concrete forms for southwest detention basin. Turned north and walked along western v-ditch to entrance of laydown yard.</p> <p>14:30 PM- Walked through north half of laydown yard. Water pump under site water tank was secondarily contained. Construction materials were neatly staged out of the path of travel.</p> <p>14:35 PM- Walked east along north fence. Observed that wattles along north fence were trenched in, with ends overlapping and sandbagged.</p> <p>14:40 PM- Checked in with Boyett. Communicated that although SWPPP specified that wattles should be staked, the sandbags used in place provide an equal level of protection. Boyett concurred.</p> <p>14:50 PM- Exited site through north gate.</p>
<p>NEW SENSITIVE RESOURCE DISCOVERIES</p>
<p>MITIGATION MEASURES VERIFIED</p> <p>APM AES-3, APM AIR-1, MM BIO-2, APM GEO-2/APM WQ-1, APM HAZ-1, APM NOI-4, MM TRAN-1</p> <p>See additional APMs and MMs listed in the description of observed activities section.</p>
<p>RECOMMENDED FOLLOW-UP</p>
<p>COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS</p>
<p>COMPLIANCE SUMMARY Below please describe any Compliance Incidents (Level 1, 2, or 3) that have occurred since your last visit. If you observe a compliance issue in the field, please note this on this monitoring form. In</p>

addition, Level 1, 2 or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.

Level 0 Acceptable. *(no compliance incidents)*

Level 1: Minor Problem. An event or observation that slightly deviates from project requirements, but does not put a resource at unpermitted risk. If you checked this box, describe the incident below and fill out a separate Compliance Incident Form.

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Description: *(include PG&E's report number)*

New Sensitive Resources

New biological, environmental, cultural/archaeological, or paleontological discovery requiring compliance with mitigation measures, permit conditions, etc., has occurred since last CPUC Compliance Monitoring visit. If checked, please describe the new discoveries and documentation/verification below.

Description: None.

Date	Level	Compliance Incident and Resolution	Relevant Mitigation Measure	Corresponding Level 1, 2, or 3 Report #

PREVIOUS COMPLIANCE INCIDENTS OR ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
09/26/19	North Gate		Photo 1- Wattles along western slope are trenched in and sandbagged. View south
09/26/19	Expansion footprint		Photo 2- All off-road equipment that leaks oil has a drip pan. View northwest.
09/26/19	Expansion footprint		Photo 3- Chemical compounds are secondarily contained. View northwest.

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
09/26/19	Expansion footprint		Photo 4- Fugitive dust reduction underway. View north.
09/26/19	Southwest basin		Photo 5- Stormwater detention basin resurfaced, recompact, and prepared for concrete cap to prevent erosion. View southwest.
09/26/19	North Gate		Trackout is well maintained on north gate. View east.

Completed by:	Evan Studley
Firm:	Soar Environmental Consulting, Inc.
Date:	09/26/19
Reviewed by:	Sam Hopstone
Firm:	Soar Environmental Consulting, Inc.
Date:	09//29