

October 23, 2020

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

Re: Monthly Report Summary #23 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, 2020, 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 offsite 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 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 WSP) 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 4 and 24, 2020. 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.

Mr. Michael Rosauer  
October 23, 2020  
Page 3

#### Compliance Incidents and Minor Compliance Observations

During the September 2020 reporting period, PG&E did not self-report any compliance incidents, and the CPUC did not issue any compliance incident reports.

#### Noise Compliance

During the September 2020 reporting period, there were no exceedances of the stipulated noise levels.

#### Public Concerns

No public concerns were reported during September 2020.

Sincerely,  
Ecology and Environment, Inc.

A handwritten signature in black ink, appearing to read 'Silvia Yanez', with a horizontal line underneath.

Silvia Yanez  
Project Manager

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

# ATTACHMENT 1

## CPUC COMPLIANCE MONITORING REPORTS SEPTEMBER 4 AND 24, 2020



## Sanger Substation Expansion Project CPUC Compliance Monitoring Report

Project Proponent	Pacific Gas & Electric (PG&E)	Report No.	CM-CPUCDG-090420
Lead Agency	California Public Utilities Commission (CPUC)	Date (mm/dd/yy)	09/04/20
CPUC Project Manager	Mike Rosauer	Monitor(s)	Sam Hopstone
CPUC (E & E) Monitoring Manager	Silvia Yanez	AM/PM Weather	Smoky, 83°F, calm
CPUC (E & E) Monitoring Supervisor	Angelica Oregel	Start/End time	0900 AM – 0930 AM
Project NTP(s)	Notice to Proceed (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 on-site 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 work areas and on approved roads?	X		
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		
<b>Biology</b>	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	
<b>Cultural and Paleontological Resources</b>	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	
<b>Hazardous Materials</b>	Yes	No	N/A
Are hazardous materials that are stored or used on-site 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		

AREAS MONITORED Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.

DESCRIPTION OF OBSERVED ACTIVITIES

0900 AM – I arrived onsite and entered through the south gate into the existing substation footprint. I checked in with the SWCA biologist Angelica Oregel. Current activity included setting switches and testing breakers. Future activities included resetting switches and hanging wires to connection points around the expansion footprint. Ms. Oregel conducted daily sweeps for sensitive species before commencement of work (MM BIO-2, MM BIO-3). She reported that no special status species had been observed onsite. A water truck was performing dust suppression in vehicular paths of travel (Photo 1) (APM AIR-1).

0910 AM – I proceeded along the detention basin to the south boundary and observed that weed suppression was performed at the bottom of the basin (Photo 2). The stormwater detention basin was dry, and concrete sidewalls remained in good condition. I proceeded north into the expansion footprint and observed that vaults and conduit paths were covered (APM HAZ-3) (Photo 3). I turned left and headed west into the temporary staging area.

0915 AM – I observed that the roll-on rain cover was installed on the main waste dumpster (Photo 4). At the north end of the temporary staging area, the water truck was refilled at the water tank. I observed secondary containment for both the generator and refill fuel container for the generator. I returned to the south gate of the temporary staging area and proceeded east into the expansion footprint.

0920 AM – I proceeded north along the west boundary of the expansion footprint to the north boundary. Vehicles were parked out of the path of travel, delineated when needed, and turned off when not in use (APM-NOI-3, APM NOI-4). I turned right and continued east along the north boundary and headed south along the east boundary. I observed crews setting switches throughout the expansion footprint. Dumpsters, vehicles, and equipment were staged outside the path of travel and delineated for visibility (Photo 5). I continued south to the control buildings, turned right, proceeded west to the west site boundary. I continued south into the existing substation.

0925 AM – I entered the construction trailer and checked the SWPPP binder. The reports were current through late August (APM WQ-1). I exited the construction trailer and checked in with Ms. Oregel who confirmed that there were no concerns to report.

0930 AM – I exited the site through the south gate onto McCall Avenue.

NEW SENSITIVE RESOURCE DISCOVERIES

**MITIGATION MEASURES VERIFIED**

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

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

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
09/04/20	Existing Substation Footprint		Photo 1- Dust suppression underway in paths of vehicle travel. Photo facing northeast.
09/04/20	Existing Substation Footprint		Photo 2- Vegetation suppression underway in the detention basin. Photo facing west.

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
09/04/20	Expansion Footprint		Photo 3- Cable vaults near the control buildings were covered and protected when not in use. Photo facing east.
09/04/20	Temporary Staging Area		Photo 4- Rain cover installed on the dumpster in anticipation of rainy weather. Photo facing west.
09/04/20	Expansion Footprint		Photo 5- Dumpsters and equipment were staged out of the path of travel, and delineated. Photo facing southwest.

Completed by:	Sam Hopstone
Firm:	Soar Environmental Consulting, Inc.
Date:	09/04/20

Reviewed by:	Laura Satterlee
Firm:	Soar Environmental Consulting, Inc.
Date:	09/04/20



## Sanger Substation Expansion Project CPUC Compliance Monitoring Report

Project Proponent	Pacific Gas & Electric (PG&E)	Report No.	CM-CPUCDG-092420
Lead Agency	California Public Utilities Commission (CPUC)	Date (mm/dd/yy)	09/24/20
CPUC Project Manager	Mike Rosauer	Monitor(s)	Ben Arax
CPUC (E & E) Monitoring Manager	Silvia Yanez	AM/PM Weather	Smoky, 74°F, breezy
CPUC (E & E) Monitoring Supervisor	Angelica Oregel	Start/End time	1000 AM – 1033 AM
Project NTP(s)	Notice to Proceed (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 on-site 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 work areas and on approved roads?	X		
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		
<b>Biology</b>	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	
<b>Cultural and Paleontological Resources</b>	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	
<b>Hazardous Materials</b>	Yes	No	N/A
Are hazardous materials that are stored or used on-site 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		

<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>1000 AM – I arrived onsite and entered through the south gate into substation expansion footprint.</p> <p>1003 AM – I checked in with the SWCA biologist Angelica Oregel. Current activity included tagging rented equipment for return and testing wiring. Ms. Oregel conducted daily sweeps for sensitive species before commencement of work (MM BIO-2, MM BIO-3). She reported that no biological resources had recently been observed onsite.</p> <p>1007 AM – I conducted a site inspection starting from the western edge of the expansion footprint, heading north towards the egress point, then west to the water tank to the existing footprint, then back south. I observed a water truck spraying the expansion footprint for dust suppression (Photo 1) (APM AIR-1). The concrete channels leading to the south detention basin were in good condition (Photo 2). Vaults and conduit paths were covered (APM HAZ-3).</p> <p>1015 AM – Ms. Oregel stated that security lighting had been installed. Vehicles were parked out of the path of travel, delineated when needed, and turned off when not in use (APM-NOI-3, APM NOI-4). A crew member was observed leaving the site through the egress point (Photo 3). I observed crew testing wiring on towers (Photo 4). Extra materials were kept in the existing substation footprint away from construction (Photo 5, Photo 6)</p> <p>1033 AM – I exited the site through the egress point onto McCall Avenue.</p>
<p>NEW SENSITIVE RESOURCE DISCOVERIES</p>
<p>MITIGATION MEASURES VERIFIED</p> <p>APM AES-3, APM-AIR-1, MM BIO-1, MM BIO-2, MM BIO-3, APM GEO-2/APM WQ-1, APM-NOI-3, APM NOI-4</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 addition, Level 1, 2 or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.</p>

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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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
09/24/20	Expansion Footprint		Photo 1- Water truck spraying soil for dust suppression. Photo facing northwest.
09/24/20	Expansion Footprint		Photo 2- Well maintained channels leading to the detention pond. Photo facing south.
09/24/20	Expansion Footprint		Photo 3- Crew were using the egress point on the north side of the footprint. Photo facing north.
09/24/20	Expansion footprint		Photo 4- Crew working on power lines with a boom lift. Photo facing north.



REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
09/24/20	Temporary Staging Area		Photo 5- Materials stored in the temporary staging area. Photo facing southwest.
09/24/20	Temporary Staging Area		Photo 6- Additional materials stored in temporary staging area. Photo facing south.

Completed by:	Ben Arax
Firm:	Soar Environmental Consulting, Inc.
Date:	09/24/20
Reviewed by:	
Firm:	Soar Environmental Consulting, Inc.
Date:	