

SOUTHERN CALIFORNIA EDISON'S SANTA BARBARA COUNTY RELIABILITY PROJECT

FINAL CONSTRUCTION COMPLETION REPORT





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Abbreviations and Acronyms

APM	applicant proposed measure
Caltrans	California Department of Transportation
CALFIRE	California Department of Forestry and Fire Service
CDFW	California Department of Fish and Wildlife
CDPR	California Department of Parks and Recreation
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulation
CPCN	Certificate of Public Convenience and Necessity
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CRMP	Cultural Resources Monitoring Plan
CSFPF	Carpinteria-Summerland Fire Protection District
ENA	Electrical Needs Area
ESA	Environmentally Sensitive Area
FAA	Federal Aviation Administration
Final EIR	Final Environmental Impact Report
GANDA	Garcia and Associates
FCERP	Fire Control and Emergency Response Plan
FRED	Field Reporting Environmental Database
HFMMP	Hydrologic Features and Mitigation Monitoring Plan
H&M	Henckels & McCoy, Inc.
HRMP	Habitat Restoration and Mitigation Plan
JMA	John Minch and Associates, Inc.
kV	kilovolt
LWS	lightweight steel
MM	mitigation measure
MMCRP	Mitigation Monitoring, Compliance, and Reporting Program
MPR	Minor Project Refinement
N/A	Not applicable
NCCP	Natural Community Conservation Plan
NCR	Non-compliance Report
NIWCP	Noxious and Invasive Weed Control Plan

NMFS	National Marine Fisheries Service
NOx	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NTP	Notice to Proceed
OB	Observation
O&M	operations and maintenance
Project	Santa Barbara County Reliability Project
PMTP	Paleontological Monitoring and Treatment Plan
PRC	Public Resources Code
QSD	Qualified SWPPP Developer
QSP	Qualified SWPP Practitioner
Rincon	Rincon Consultants, Inc.
ROG	reactive organic gas
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SBCAPCD	Santa Barbara County Air Pollution Control District
SBCFD	Santa Barbara County Fire Protection District
SBCRP	Santa Barbara County Reliability Project
SCE	Southern California Edison
SWMP	Solid Waste Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TDC	turbine-driven compressor
TSP	tubular steel pole
USACE	United States Army Corps of Engineers
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
VCAPCD	Ventura County Air Pollution Control District
VCFPD	Ventura County Fire Protection District
WEAP	Worker Environmental Awareness Program
WEP	Water Efficiency Plan

1 Introduction and Project Overview

This Final Construction Completion Report has been prepared to summarize the construction and monitoring activities conducted for the Southern California Edison (SCE) Santa Barbara County Reliability Project (referred to herein as “the project” or “the SBCRP”). The project involved reconstruction of existing 66-kilovolt (kV) subtransmission facilities and modifications of subtransmission and substation equipment within various Southern California substations. As the Lead Agency for the project, the California Public Utilities Commission (CPUC) conducted the environmental review process and granted final approval of the project. The CPUC issued a Certificate of Public Convenience and Necessity (CPCN) and certified the Final Environmental Impact Report (Final EIR) on November 15, 2015 (Decision 15-11-003). WSP USA (WSP), under contract with the CPUC, prepared the Final EIR in accordance with the California Environmental Quality Act (CEQA) to inform the public and meet the requirements of local, state, and federal agencies in their evaluation of the SCE proposed project.

In May 2018, the CPUC and WSP, in coordination with SCE, developed the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to provide guidance and procedures for environmental monitoring during project construction. WSP implemented the MMCRP to ensure compliance with the project mitigation measures (MMs), applicant proposed measures (APMs), compliance plans, and permit conditions during all phases of construction. The implementation of the MMCRP for the SBCRP is summarized in this Final Report and outlined as follows:

Section 1, Introduction and Project Overview

Section 1 provides an overview of the SBCRP and approvals granted by the CPUC as the lead agency and other responsible agencies. Additionally, this section outlines the roles and responsibilities undertaken by SCE, the CPUC, and WSP as the compliance monitoring team, including permit tracking, notices to proceed with preparation, review of minor project refinements, SCE project commitments, and mitigation implementation.

Section 2, CEQA Compliance

Section 2 summarizes the potential significant impacts identified in the Final EIR and the mitigation measures or project commitments implemented to reduce those impacts.

Section 3, Construction and Compliance

Section 3 provides an overview of construction and compliance activities for the SBCRP, including preconstruction and post-construction activities.

1.1 Overview of the SBCRP

The SBCRP is located in northwestern Ventura County and southeastern Santa Barbara County, California. The project objectives are to:

- Provide long-term reliability and continuity of service to the Electrical Needs Area (ENA);
- Enhance operational flexibility by providing the ability to transfer the electrical load between local substations and remove existing 220-kV and 66-kV lines from service, when needed, for maintenance purpose; and
- Increase energy efficiency of the 66-kV subtransmission line.

1.1.1 Schedule

A summary of construction on the Project is as follows; overall construction began on September 1, 2017 and was delayed due to the non-project related Thomas Fire on December 4, 2017 and heavy rains resulting in mudslides through January 2018. Project construction resumed until November 2018, when the Woolsey Fire in Los Angeles and Ventura Counties and Hill Fire in Ventura Counties caused electrical grid instability. Overall construction was completed on September 19, 2019. Post-construction and habitat restoration activities continued for one to five years, depending on the disturbance, restoration level, and success criteria in accordance with the SBCRP Habitat Restoration and Mitigation Plan (HRMP).

1.1.2 Major Project Components

The SBCRP includes the following main components:

- Removal and/or replacement of existing 66-kV subtransmission facilities, primarily within existing utility rights-of-way (ROWs) between the existing Santa Clara Substation in Ventura County and the existing Carpinteria Substation in Santa Barbara County;
- Installation of marker balls on overhead wire, where determined necessary;
- Modification of subtransmission and substation equipment within the existing Carpinteria Substation, Casitas Substation, and Santa Clara Substation;
- Replacement of line protection relays within existing substation equipment rooms or cabinets at the Getty Substation, Goleta Substation, Ortega Substation, and Santa Barbara Substation;
- Installation of telecommunications facilities to connect the project to SCE's existing telecommunications system for the protection, monitoring, and control of subtransmission and substation equipment;
- Installation of new telecommunications facilities along reconstructed subtransmission segments and at the Carpinteria Substation, Casitas Substation, Santa Clara Substation, and Ventura Substation;
- Transfer of distribution lines (and third-party infrastructure as necessary) to new subtransmission structures; and
- Removal of subtransmission infrastructure, such as tower foundation footings, that had been decommissioned during previous 66-kV reconstruction activities between 1999 and 2004.

Project components pass through unincorporated Ventura and Santa Barbara counties and the cities of Ventura, Carpinteria, Santa Barbara, and Goleta.

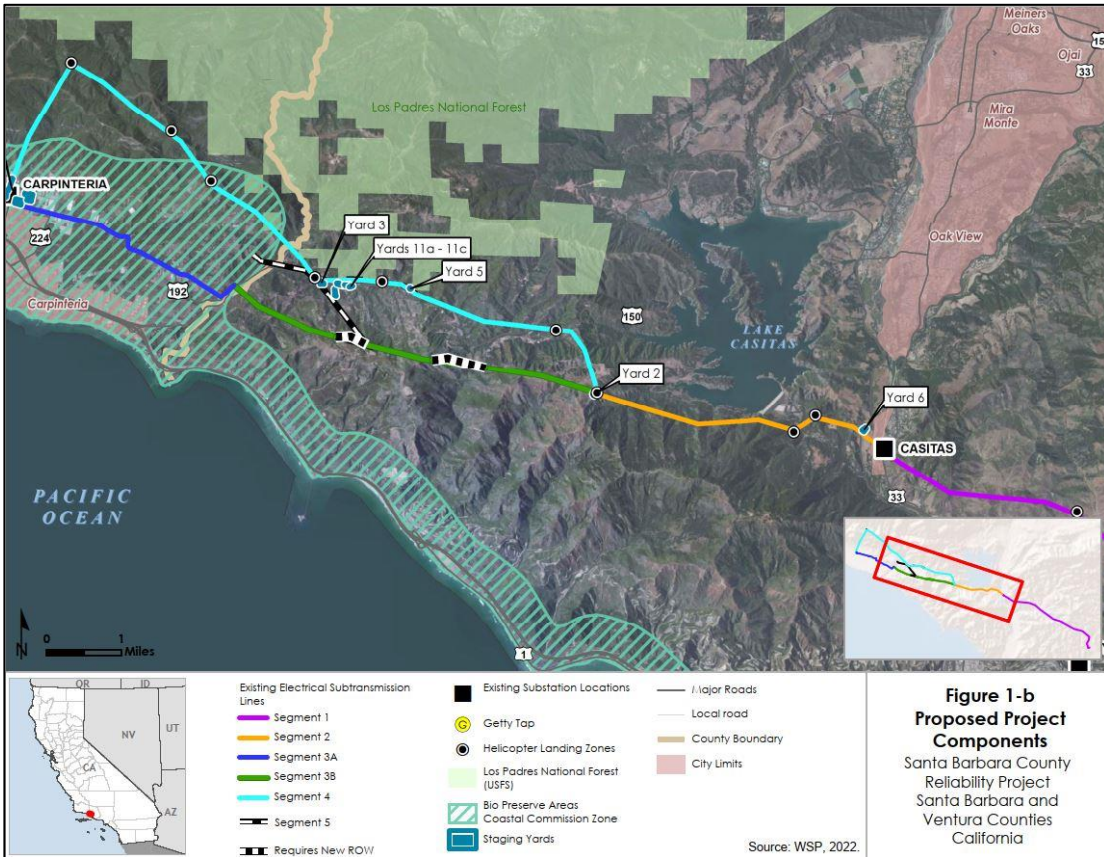
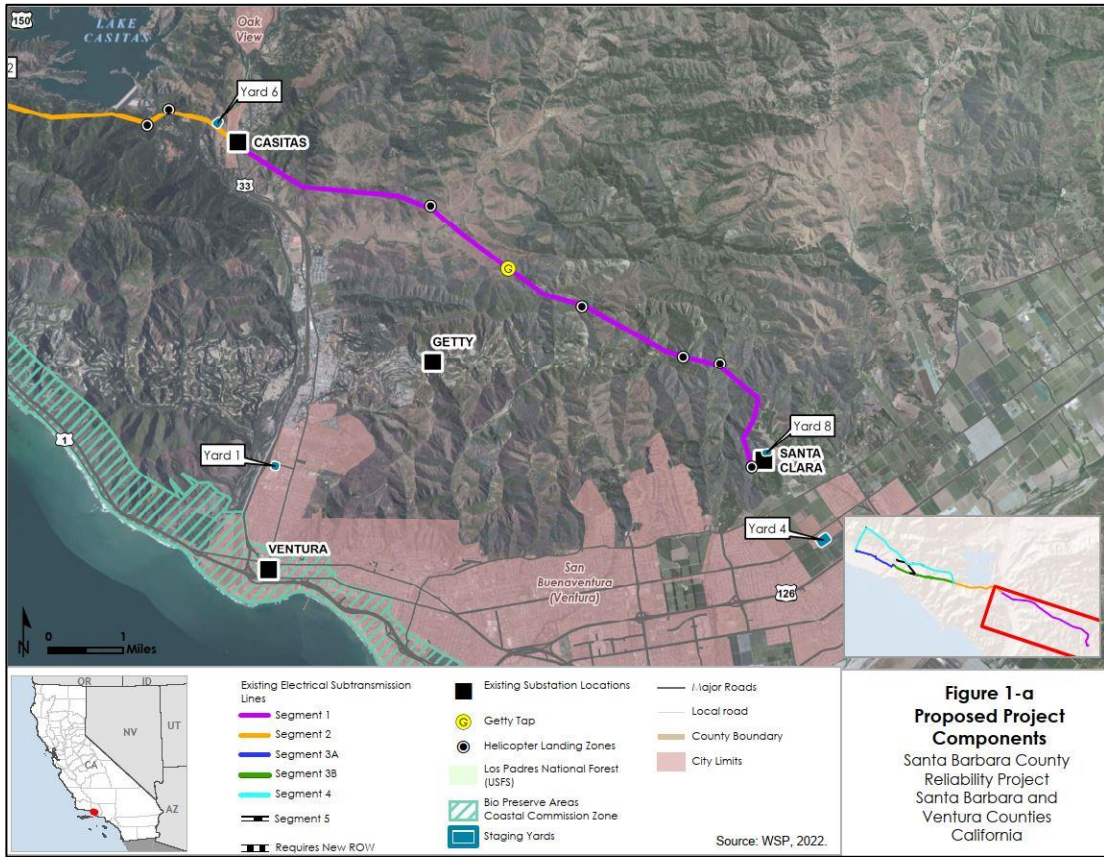
1.1.3 Major Project Phases

Construction was completed in several major phases, as described below.

Phase 1: *Establishment of staging yards in Ventura County.* In October 2016, SCE established eight staging yards in Ventura County, which were used throughout construction for reporting locations for workers, vehicle and equipment parking, and material storage.

Phase 2: *Reconstruction of the 66-kV line, telecommunications installation, substation upgrades, and staging yard establishment.* In May 2017, SCE began reconstruction on the 66-kV line, which involved modification, removal, or installation of towers, tubular steel poles (TSPs), lattice steel towers, lightweight steel (LWS) poles, and foundations in Segments 1, 2, 3A, 3B, 4, 5, Getty Tap, and Casitas and Carpinteria substations. This phase also included telecommunication cable installation and undergrounding at the Santa Clara and Casitas substations, substation work at Santa Clara, Casitas, Carpinteria, Ortega, Goleta, and Getty substations, and development of Staging Yards 9 and 10.

Phase 3: *Post-construction and restoration.* Restoration and revegetation of applicable SBCRP temporary disturbance areas. Post-construction activities during Phase 3 included restoration of sites requiring jurisdictional water permits.



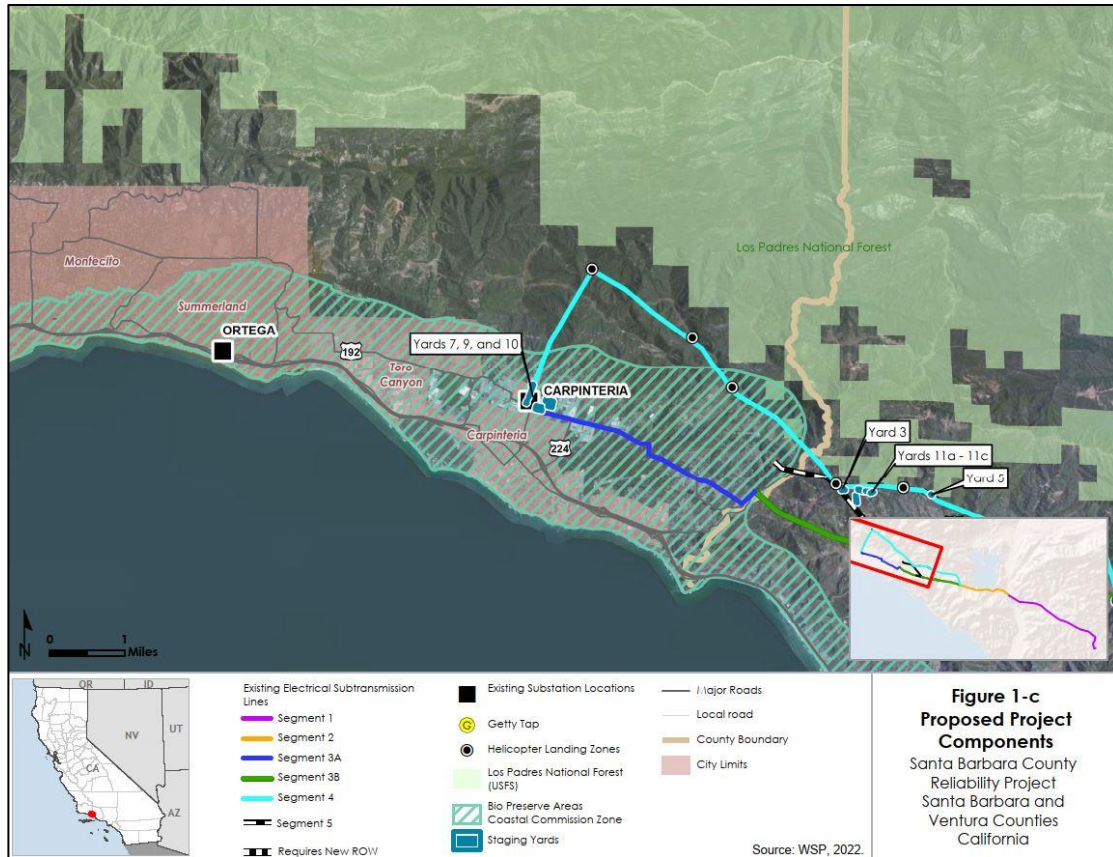


Figure 1. Subtransmission Line Route

1.2 Roles and Responsibilities of SCE, CPUC, and the WSP Monitoring Team

Roles and responsibilities described in Chapter 2 of the MMCRP were implemented during construction. Mitigation monitoring took place to ensure that MMs and PCs identified in the Final EIR were implemented as proposed.

1.2.1 SCE

SCE, as the project applicant, had the primary responsibility to ensure compliance with its aspects of the Compliance Plan and relevant local, state, or federal regulations or authorizations. In addition, SCE was required to obtain and comply with all required permits and approvals. The CPUC monitored SCE's compliance by verifying that SCE had adequately implemented MMs and PCs and that construction and operation activities were consistent with the Final EIR's project description.

SCE Project Manager, Ken Spear, provided overall direction, management, leadership, and corporate coordination for the project. He was responsible for the project construction schedule and ensured the project was completed as required by project contract documents and conditions, including PCs, MMs, and permit requirements.

SCE Environmental Project Manager (EPM), Marcus Obregon, was responsible for developing and implementing preconstruction environmental planning, permitting, and compliance activities. SCE's environmental consultant, Rincon Consultants, supported the EPM with onsite monitoring and was ultimately responsible for ensuring SCE's construction crews maintained compliance with all project permits.

1.2.2 CPUC

The CPUC Project Managers, Jensen Uchida and Connie Chen, provided SCE and the WSP monitoring team with direction and clarification regarding protocols. In addition, they were responsible for reviewing and issuing Notice to Proceed (NTP) authorization letters, reviewing and approving Minor Project Refinements (MPRs), and issuing Non-Compliance Reports (NCRs).

1.2.3 WSP Monitoring team

The WSP monitoring team consisted of the Compliance Manager, Deputy Compliance Manager, Compliance Monitors, and office support staff. WSP's Compliance Managers, Jenny Vick (2017-2018), and Fernando Guzman (2018-completion), were SCE's points of contact and were responsible for overseeing all monitoring activities. In addition, the Compliance Manager was responsible for direct communication with the CPUC, including preparing monthly compliance reports. Other responsibilities included:

- Managing the field monitoring team
- Reviewing compliance documentation
- Reviewing NTP and MPR requests
- Providing the CPUC with recommendations for approval

WSP's Deputy Compliance Manager supported the Compliance Manager by reviewing preconstruction compliance materials, NTP and MPR requests, compliance monitoring reports, and survey results.

The CPUC Compliance Monitor, Vince Semonsen of Ecotech Resources Inc., performed onsite monitoring, reported compliance issues, and prepared monitoring reports. Additionally, he provided field input on NTP or MPR requests. Furthermore, various resource specialists and office staff assisted in reviewing plans or documents as needed.

1.3 Coordination and Communications

In field communications were conducted by the CPUC, WSP, and SCE/contractor field representatives in accordance with the MMCRP. As such, the CPUC, WSP, and SCE held regular teleconference meetings before and during construction. The meetings allowed the parties to discuss construction schedule updates, environmental issues and concerns, and compliance incidents. SCE provided daily species and incident reports, weekly status updates on the project, as well as monthly compliance reports, nesting bird trackers, Storm Water Pollution Prevention Plan (SWPPP) reports, and spill logs.

Verbal warnings and written communications (emails and photographs) were utilized to notify SCE and its contractors of non-compliance activities. Meanwhile, field observations were logged into a site inspection report by the CPUC Compliance Monitor for every site visit. The Compliance Monitor also regularly communicated with SCE's environmental consultant and other project personnel during site visits as needed. All field observations by the Compliance Monitor were then included as an attachment to the compliance report WSP prepared monthly.

In addition, a CPUC SBCRP Project web site was regularly updated to reflect ongoing Project construction activities (<https://ia.cpuc.ca.gov/environment/info/ene/sbcpr/sbcpr.html>). The project's MMCRP, NTPs, MPRs, and Monitoring Reports were available via the website.

SCE also provided daily species and incident reports, weekly status updates on the project, monthly compliance reports, nesting bird trackers, Storm Water Pollution Prevention Plan (SWPPP) reports, and spill logs.

2 CEQA Compliance

In the CPUC's Final Decision to approve the project, the Mitigation Monitoring and Reporting Plan was adopted, as presented in Chapter 10 in the Final EIR. The Mitigation Monitoring and Reporting Plan list all MMs and PCs that an applicant is required to implement for the project to reduce potential impacts to less than significant. The CPUC and WSP then developed the MMCRP, with input from SCE, to serve as a working guide to maintain environmental compliance for the project and included specific protocols, guidelines, and standard procedures for environmental compliance with the CEQA document.

2.1 Potential Significant Impacts

The Final EIR identified potentially significant impacts in several resource sections. Below is a summary of the various potential significant impacts and MMs or APMs that were identified to reduce these impacts.

Aesthetics. Potential significant impacts included impacts on visual character and quality and introduction of glare. SCE was required to implement MM AE-1, MM AE-2, MM AE-3, and MM AE-4, which required restoring disturbed areas to conditions that would blend with the landscape, keep construction sites clean and equipment and building materials inconspicuous, reduce the aesthetic impacts of retaining walls and access roads using finishes that blend with the landscape, and use non-reflective or colored treatments on transmission structures to reduce glare and color contrast.

Air Quality. Potential significant impacts included violation of air quality standards for particulate (PM₁₀ and PM_{2.5}) emissions and a cumulatively considerable net increase in nitrogen oxide (NO_x), reactive organic gas (ROG), and PM₁₀ emissions within the Santa Barbara County Air Pollution Control District (SBCAPCD). SCE was required to implement MM AQ-1, a measure requiring minimizing nitrogen oxides and particulate matter emissions from off-road diesel-powered construction equipment greater than 75 horsepower used during 66-kV subtransmission line or access road construction to meet Tier 3 and Tier 4 off-road emissions standards. Additionally, the applicant implemented two APMs: APM AQ-1, which required SCE to undertake control measures stated in the Ventura County Air Pollution Control District (VCAPCD) Air Quality Assessment Guidelines to minimize the generation of fugitive dust, and APM AQ-2, which required SCE to implement select control measures from the VCAPCD Air Quality Assessment Guidelines.

Biological Resources. Potentially significant impacts to biological resources included impacts to special status species (including coast range newt, California red-logged frog, Southwestern willow flycatcher, burrowing owl, least Bell's vireo, and ringtails, and American badgers), riparian habitat or sensitive natural communities, federally protected wetlands, and wildlife migration corridors or nursery sites. The SBCRP could also conflict with local policies or ordinances protecting biological resources.

To reduce potential impacts to biological resources to less than significant, SCE implemented APM BIO-1 (pre-construction surveys), APM BIO-2 (minimize impacts on vegetation), APM BIO-3 (biological monitoring), APM BIO-4 (nesting bird surveys), APM BIO-5 (San Diego desert woodrat avoidance), APM BIO-6 (burrowing owl surveys), APM BIO-7 (SWPPP measures), APM AQ-1 (minimization of fugitive dust, including vehicle speed limits), and APM GEN-1 (Worker Environmental Awareness Program [WEAP]). In addition, SCE was required to implement MM BIO-1 through MM BIO-14:

MM BIO-1 required all project-related construction activities to be restricted to approved access roads and construction areas that are clearly indicated, and all sensitive resources to be clearly marked and avoided.

MM BIO-2 required preconstruction surveys for special status species. MM BR-3 required biological monitoring during construction by CPUC-approved qualified biologists.

MM BIO-3 required the development of a noxious and invasive species control plan. MM BR-5 required SCE to implement California gnatcatcher surveys and avoid its habitat.

MM BIO-4 limited the impacts on native vegetation and trees, thereby also reducing impacts on special status wildlife habitats by limiting habitat removal.

BIO-5 required SCE to develop a habitat restoration and monitoring plan prior to construction and mitigate for impacts on specific special status plants, trees, and natural communities that may be important to native wildlife habitats.

MM BIO-6 provided measures to prevent entrapment of wildlife in project trenches and other excavations as well as to protect wildlife by preventing access to project-related trash.

MM BIO-7 provided guidelines for reducing impacts on special status wildlife resulting from lighting during nighttime construction.

MM BIO-8 reduces impacts on special status aquatic wildlife species by placing restrictions on travel and construction near hydrologic features.

BIO-9 required SCE to implement California red-legged frog surveys and avoid its habitat.

MM BIO-10 required SCE to develop an agency-approved Nesting Bird Management Plan before the start of construction if any portion of the project was scheduled to occur during the general bird breeding season.

MM BIO-11 required slightly more stringent measures than those provided under APM BIO-6, including the requirement for preconstruction burrowing owl surveys no more than 14 days prior to construction during breeding season.

MM BIO 12 required habitat assessments at all jurisdictional drainages identified by the applicant and any other drainage where Southwestern willow flycatcher or least Bell's vireo could be affected, including the Ventura River (due to overhead stringing by helicopter), with follow-up protocol nesting season surveys where habitat was present.

MM BIO-13 required avoidance of ringtail and badger burrows.

MM BR-18 required SCE to implement all project commitments except in cases where they were superseded or modified by mitigation measures.

BIO-14 required SCE to assess whether grading and vegetation removal would impact resources in the project area and issue an Environmental Clearance to operations and maintenance (O&M) staff outlining appropriate MMs, APMs, and state and federal permit conditions.

Cultural Resources. The project had the potential to significantly impact historical, archaeological, and paleontological resources and/or human remains. Therefore, the applicant was required to implement APM CUL-1, APM CUL-2, and APM CUL-3, which required them to conduct cultural surveys for all areas not previously surveyed and to avoid, minimize, and mitigate impacts to cultural and paleontological resources. In order to reduce impacts to less than significant, SCE was also required to implement MM CUL-1 through CUL-15:

MM CUL-1 required SCE to conduct cultural resource surveys for all areas to be disturbed that had not already been surveyed for cultural resources.

MM CUL-2 required SCE to fence off and avoid known cultural resources.

MM CUL-3 required SCE to retain a qualified cultural resource consultant and submit their resumes to CPUC for approval.

MM CUL-4 required SCE to develop and submit Cultural Resource Plans for each project component.

MM CUL-5 required SCE to provide evidence of Native American consultation and that tribes that had expressed interest in the project during any phase were given the opportunity to participate in additional cultural resources surveys and cultural resources monitoring.

MM CUL-6 required that qualified archaeologists monitor cultural resources mitigation and ground-disturbing activities in culturally sensitive areas during construction and restoration.

MM CUL-7 required SCE to stop work for unanticipated cultural resource discoveries and allow a qualified archaeologist to assess the discovery for potential eligibility for the California Register of Historic Resources (CRHR) or local registers and implement appropriate measures in accordance with the Cultural Resources Plans.

MM CUL-8 required a qualified cultural consultant to submit a Testing and Evaluation Plan to the CPUC for approval prior to further disturbance of a newly discovered cultural resource.

MM CUL-9 required a qualified cultural consultant to prepare a Data Recovery Plan that outlines the extent of excavation, recovery/salvage, curation, and recordation that would occur if construction activities were not able to avoid impacting a cultural resource found during construction that was eligible for listing in the CRHR or local registers or as “unique” archaeological resources pursuant to CEQA.

MM CUL-10 required the applicant’s qualified archaeologists to submit reports to the CPUC summarizing all monitoring and mitigation activities and confirming that all mitigation measures had been implemented.

MM CUL-11 required SCE to submit a Paleontological Monitoring and Treatment Plan for each project component.

MM CUL-12 required SCE to retain the services of qualified professional paleontological consultants and submit their resumes to CPUC for approval.

MM CUL-13 required the applicant to undertake paleontological construction monitoring during ground disturbance in areas with high paleontological sensitivity.

MM CUL-14 required the applicant to ensure that ground-disturbing work was halted or diverted from an unanticipated paleontological discovery.

MM CUL-15 required all construction and restoration personnel involved in ground-disturbing activities and the supervision of such activities to undergo worker environmental awareness training, which would include segments on cultural and paleontological resources.

Geology, Soils, and Mineral Resources. Potentially significant impacts were associated with landslides, liquefaction, and/or lateral spreading. SCE implemented APM GEO-1, which required SCE to design project components to minimize the potential for landslides, lateral spreading, subsidence, liquefaction, or collapse based on the findings of a geotechnical analysis. To reduce impacts to less than significant, SCE also implemented MM GEO-1, which required SCE to conduct annual, or more often as needed, maintenance patrols to identify areas of active slope instability and submit an annual report to the CPUC.

Greenhouse Gases. No potentially significant impacts.

Hazards and Hazardous Materials. Potentially significant impacts resulting from project construction and operations included exposing the public or environment to contaminants and an increased risk of wildfire, and impairing implementation of an emergency response or evacuation plan. SCE implemented APM GEN-1, which required SCE to develop a WEAP. In addition, to reduce potentially significant impacts to less than significant, SCE implemented MM HZ-1, which required SCE to submit a Contaminated Soil/Groundwater Contingency Plan to address unanticipated unearthing or exposure of buried hazardous materials, contamination, or contaminated groundwater, and MM HZ-2, which required the applicant to develop a Fire Control and Emergency Response Plan.

Hydrology and Water Quality. No potentially significant impacts.

Land Use and Planning. No potentially significant impacts.

Noise. Potentially significant impacts related to noise included an increase in ambient noise levels during construction. In order to reduce potentially significant impacts to less than significant, SCE implemented the following APMs:

APM NV-1: Construction activities were conducted or phased to ensure that noise generated during construction would not exceed thresholds or durations identified by the City of Carpinteria Resolution No. 408, the County of Ventura noise regulations set forth in the County's Construction Noise Criteria and Control Plan, or the County of Santa Barbara Environmental Thresholds and Guidelines Manual.

APM NV-2: Equipment and trucks used for the proposed project employed the best available noise control techniques to the extent feasible.

APM NV-3: Stationary sources were located as far from adjacent noise-sensitive receptors as reasonably possible and were enclosed, if feasible.

APM NV-4: Where feasible, temporary portable sound barriers were deployed where construction noise would cause noise levels at sensitive receptor locations to be in excess of an applicable criteria threshold. For purposes of this APM, schools were considered sensitive receptor locations during instruction hours only.

APM NV-5: At least two weeks prior to the anticipated start of construction at a particular location, the applicant notified all property owners within 300 feet of that location that construction activities were about to commence at that location.

In addition, SCE implemented MM NS-1, which required SCE to employ noise reduction and control practices during construction to ensure that the temporary increase in ambient noise did not exceed maximum allowable levels identified by the applicable jurisdiction.

Population and Housing. No potentially significant impacts.

Public Services and Utilities. Potentially significant impacts related to public services and utilities included decreased performance or response times from fire protection and emergency response, insufficient water supplies, and noncompliance with federal, state, or local statutes and regulations related to solid waste. In order to reduce impacts to less than significant, the applicant was required to implement MM HZ-2 (described above), MM PS-1 (Water Efficiency Plan), and MM PS-2 (Solid Waste Management Plan).

Recreation. Potentially significant impacts associated with recreation included temporary closures or detours along the Ojai Valley Trail and Franklin Trail. The applicant was required to implement MM RE-1, which required SCE to provide users of the Ojai Valley Trail and the Franklin Trail with at least one-week notice of expected trail closures or detours.

Transportation. Potentially significant impacts related to transportation could result from lane closures or lane reductions during construction of the 66-kV line, incidents or accidents involving helicopters, inadequate emergency access, decrease the performance or safety of public transit, bicycle, or pedestrian facilities, and contribute to traffic safety hazards. In order to reduce impacts to less than significant, the applicant was required to implement MMs TT-1 through TT-4, which required SCE to develop a Traffic Control Plan and Helicopter Safety Plan, notify nearby residents and the Van Nuys Flight Standards District Office at least one week in advance of all days during which helicopter operations were planned to occur, and repair damaged trails.

2.2 Permits

The applicant was also required to obtain several permits from various federal, State, and local agencies for the project, as summarized in Table 1. WSP tracked the necessary permitting requirements to ensure that all applicable agency permits and approvals were issued prior to construction. In addition, SCE provided copies of all permits to the CPUC.

Table 1. SBCRP Summary of Consultation and Permit Requirements

Consultation/Permits	Agency/Group	Purpose
Federal		
Clean Water Act Section 404 Nationwide Permit	U.S. Army Corps of Engineers	Section 404 regulates discharge of “fill” into “Waters of the United States”. Section 401 requires that any applicant for a Section 404 Permit also obtain a Clean Water Act Certification from the state (see below).
Federal Aviation Regulations Part 77 (Objects Affecting Navigable Airspace), Part 133 (Rotorcraft External-Load Operations)	Federal Aviation Administration	Consultation regarding objects that may affect navigable airspace. Consultation to determine whether Congested Area Plan approval for helicopter external-load operations is required.
Federal Endangered Species Act Incidental Take Permit or Authorization under Natural Communities Conservation Plan	United States Fish and Wildlife Service	Special status species surveys and mitigation as required, take authorization (i.e., Incidental Take Permits, if required), and informal or formal consultation.
National Marine Fisheries Service consultation	National Oceanic and Atmospheric Administration	Consultation to determine appropriate best management practices for widening an access road in Sutton Creek.
United States National Forest System land, Los Padres National Forest consultation and permission	United States Forest Service	Permission to construct components within the Los Padres National Forest. NEPA review for these components as well as additional SCE work on forest lands, which is not related to the proposed project, will be conducted separately by Los Padres National Forest Service staff.

Table 1. SBCRP Summary of Consultation and Permit Requirements

Consultation/Permits	Agency/Group	Purpose
State		
California Public Utilities Code Section 1001 et seq. and CPUC General Order No. 131-D	California Public Utilities Commission	CEQA review and overall approval of the proposed project, including approval of a CPCN or CPCN exemption and approval of a Permit to Construct electrical subtransmission line facilities designed for operation at 66-kV.
Clean Water Act Section 401 Permit	California State Water Resources Control Board	Required for discharge into Waters of the U.S. or Waters of the State.
California Department of Fish and Game Code Section 2081 California Endangered Species Act and 1600 Lake and Streambed Alteration Agreement	California Department of Fish and Wildlife	Consultation for Section 2081 of the California Endangered Species Act. Consultation for Section 1600 of the Fish and Game Code (streambed alteration agreement). Streambed Alteration Agreement when an activity will: divert or obstruct the natural flow of any river, stream, or lake, change the bed, channel, or bank of any river, stream, or lake, use material from any river, stream, or lake, or deposit or dispose of material into any river, stream, or lake.
California Streets and Highways Code 660 to 711.21, California Code of Regulations 1411.1 to 1411.6	California Department of Transportation	Caltrans requires that all work done within or spanning a state or interstate highway Right-of-Way receive an encroachment permit. Permits are also required for oversize and/or overweight truckloads that exceed legal load limits as defined by the California Vehicle Code.
National Historic Preservation Act Section 106, California Register of Historical Resources, California Public Records Act	State Historic Preservation Office,	Consultation for Section 106 of the National Historic Preservation Act. Consultation regarding known cultural resources. Consultation regarding the listing of cultural or historic resources in the National Register of Historic Places or California Register of Historical Resources.
Native American Consultation	Native American Heritage Commission	Identifies the local recognized Native American groups.

Table 1. SBCRP Summary of Consultation and Permit Requirements

Consultation/Permits	Agency/Group	Purpose
Regional and Local		
CEQA review and approval, Coastal Development Permit	Santa Barbara County Planning Development Department	CEQA review and approval of work within the California Coastal Zone. Coastal Development Permit for Segment 3A and portions of Segment 4.
CEQA review and approval, Coastal Development Permit	City of Carpinteria Community Development Department	CEQA review and approval of work within the California Coastal Zone. Coastal Development Permit for a portion of Segment 3A.
Section 402 of the Federal Clean Water Act, National Pollutant Discharge Elimination System General Permit for Discharge of Construction Related Storm Water	Central Coast and Los Angeles Regional Water Quality Control Board	Notice of Intent to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ.
Access permits, flood control areas, temporary land occupancy and staging areas, grading, excavation, afterhours work, encroachment, tree trimming/removal, and traffic control/lane closures	City/County (other ministerial)	Permits for crossing flood control areas, temporary use/occupancy, grading, excavation and shoring, and afterhours work (if required).

Source: CPUC, 2020 MMCRP.

Key:

Caltrans = California Department of Transportation

CPCN = Certificate of Public Convenience and Necessity

CPUC = California Public Utilities Commission

CEQA = California Environmental Quality Act

kV = kilovolt

NEPA = National Environmental Policy Act

SCE = Southern California Edison

3 Construction and Compliance

As presented in Section 2, the intent of the monitoring program was to ensure compliance with all Final EIR Mitigation Measures (MM) and Applicant Proposed Measures (APMs) to reduce impacts to less than significant. In addition, the development of many compliance plans was required, as well as resource and local agency permitting, as described in Section 2.2. These MMs, APMs, compliance plans, and permit conditions had pre-construction, during construction, and post-construction requirements. This section presents these various phases of compliance, as well as construction activities, as follows:

- Section 3.1 Pre-construction compliance activities,
- Section 3.2 Construction activities,
- Section 3.3. Compliance during construction activities, and

- Section 3.4 Post-construction compliance activities.

3.1 Preconstruction Compliance

3.1.1 Compliance Plans

In addition to obtaining the necessary regulatory permits and approvals (as identified in Section 2.2), several mitigation measures or APMs required the applicant to develop specific compliance plans. As such, prior to construction, SCE submitted various compliance plans to the CPUC to satisfy federal, state, and local agency mitigation and permit requirements. Once submitted, WSP reviewed the compliance plans on behalf of CPUC to ensure appropriate environmental protection would occur. Upon CPUC approval, SCE distributed the approved plans to applicable jurisdictions in accordance with relevant MMs. In addition, SCE updated compliance plans as necessary in response to changing Project needs. Moreover, compliance with the plans during construction and post-construction restoration was monitored by the WSP compliance monitoring team and by a third-party compliance monitor. A list of compliance plans implemented during construction and required compliance verification is presented in Table 2.

Item	MM or PC	Responsible Action Agency	SBCRP Implementation
Burrowing Owl Compensation Plan	MM BIO-11	CPUC, CDFW	Yes
Construction Equipment Tier 3 and Tier 4 off-road emission annual report	MM AQ-1	CPUC	Yes
Contaminated Soil/Groundwater Contingency Plan	MM HZ-1	CPUC	Yes
Cultural Resources Plan If discoveries: 1. Testing and Evaluation Plan 2. Data Recovery Plan	APM CUL-1, MM CR-1, MM CR-3, MM CR-8, MM CR-9	CPUC	Yes
Fire Control and Emergency Response Plan	MM HZ-2	CPUC, CALFIRE, USFS, SBCFD, VCFPD, CSFPD	Yes
Habitat Restoration and Mitigation Plan	MM BIO-5	CPUC, NMFS, CDFW, USFWS, Santa Barbara and Ventura Counties	Yes
Helicopter Safety Plan and External Load Training; WEAP training	MM TT-2	CPUC	Yes
Hydrologic Features and Mitigation Monitoring Plan	MM BIO-5	CPUC, NMFS, CDFW, USFWS, Santa Barbara and Ventura Counties	Yes
Jurisdictional Delineation	MM BIO-5	CPUC, CDFW, NMFS, USFWS, USACE, Santa Barbara and Ventura Counties	Yes

Table 2. SBCRP: Plans and Other Documentation Required for Compliance Verification

Item	MM or PC	Responsible Action Agency	SBCRP Implementation
Native American Consultation and Participation Plan	MM CR-5	CPUC	Yes
Nesting Bird Management Plan	APM BIO-4, MM BIO-10	CPUC, USFWS, CDFW	Yes
Noise Control Plan	MM NV-1	CPUC	Yes
Notification and Monitoring Helicopter Use	MM TT-3	CPUC, Van Nuys Flight Standard District	Yes
Notification and Report of Discovery of Human Remains	APM CUL-1	CPUC, County Coroner	NA ¹
Notification of Trail Closures	MM RE-1	CPUC, City of Carpinteria Parks and Recreation Department, County of Ventura Parks Department	Yes
Noxious and Invasive Weed Control Plan	MM BIO-3	CPUC, CDFW, Santa Barbara and Ventura Counties	Yes
Paleontological Monitoring and Treatment Plan	APM CUL-2, MM CR-11, MM CR-14	CPUC	Yes
Repair of Damaged Trails	MM TT-4	CPUC	Yes
Solid Waste Management Plan	MM PS-2	CPUC, Santa Barbara and Ventura Counties	Yes
Surface Treatment Plan	MM AE-4	CPUC	Yes
Traffic Control Plan	MM TT-1	CPUC, City of Carpinteria, CSFPD, City of Ventura, Santa Barbara and Ventura Counties	Yes
Water Efficiency Plan	MM PS-1	CPUC, SWRCB	Yes
Stormwater Pollution Prevention Plan	APM BIO-7	CPUC, RWQCB	Yes

¹ NA = Not applicable. No discovery of human remains occurred during SBCRP construction and post-construction activities. Therefore, notification and reporting were not required.

Table 2. SBCRP: Plans and Other Documentation Required for Compliance Verification

Item	MM or PC	Responsible Action Agency	SBCRP Implementation
Worker Environmental Awareness Program: dust control, biological resources, cultural and paleontological resources, SWPPP, spill protection	APM GEN-1, MM BIO-9, MM CR-15	CPUC	Yes

Source: CPUC, 2017 MMCRP.

Key:

APM = Applicant proposed Measures
 CALFIRE = California Department of Forestry and Fire Protection
 CDFW = California Department of Fish and Wildlife
 CPUC = California Public Utilities Commission
 CSFPD = Carpinteria-Summerland Fire Protection District
 MM = Mitigation Measure
 NA = Not applicable
 NMFS = National Marine Fisheries Service

SBCFD = Santa Barbara County Fire Protection District
 SBCRP = Santa Barbara County Reliability Project
 SWPPP = Stormwater Pollution Prevention Plan
 SWRCB = State Water Resources Control Board
 USACE = United States Army Corps of Engineers
 USFS = United States Forest Service
 USFWS = United States Fish and Wildlife Service
 VCFPD = Ventura County Fire Protection District
 WEAP = Worker Environmental Awareness Program

3.1.2 Field Efforts

Prior to the start of construction at any given location, SCE and their construction contractors were required to follow established construction practices, including but not limited to the list below. Many of these practices were also included as permit requirements or mitigation measures with ongoing/time-sensitive requirements.

- **Work Site Staking/Flagging.** Prior to any construction, equipment, or crew mobilization at each work site, SCE marked resource and work areas with staking or flagging to identify the limits of work and biological resources. As required by the noted mitigation, lead biologists established avoidance buffers to minimize biological resource impacts. SCE provided CPUC final engineering GIS shapefiles depicting all temporary and permanent disturbance areas, as well as summary data on temporary and permanent disturbance for each vegetation or habitat type within each jurisdictional area. This staking/flagging was field validated by the CPUC Compliance Monitor.
- **SWPPP BMPs.** Installation of stormwater best management practices at worksites as required by the Project Storm Water Pollution Prevention Plan.
- **Worker Environmental Awareness Program Training.** A WEAP was prepared to educate on-site workers about the proposed Project’s sensitive environmental issues. Throughout the construction, SCE/contractor was responsible for ensuring that all on-site project personnel received the WEAP training before beginning work. SCE/contractor maintained a list of all personnel who completed the WEAP training. This list was made available to the CPUC Compliance Monitor upon request. Additionally, brief WEAP refresher presentations were held at morning tailboards to help construction crews and other personnel maintain awareness of environmental sensitivities and requirements.

3.2 Construction

Construction activities are described in this section by NTP.



Figure 2. Establishment of the Teen Challenge Yard, October 19, 2017



Figure 4. Foundation drilling at Construct 94, March 8, 2018



Figure 3. Installation of welded wire walls at Construct 64. Burned areas from the non-project related Thomas Fire shown in the background, December 21, 2017



Figure 5. Tower construction in Carpinteria Yard B, March 19, 2018



Figure 7. Wire pulling at TSP 81, April 12, 2018



Figure 6. TSP installation at Construct 83, April 17, 2018



Figure 8. Foundation preparation at Construct 107, June 27, 2018



Figure 9. Marker balls installed on wires in Segment 4, September 7, 2018



Figure 10. Hilfiker wall installed along the TSP 76 access road, November 16, 2018



Figure 11. Restored and revegetated slope near the Segment 1 TSP 201E, December 14, 2018



Figure 13. New guard rail installed near TSP 99 in Segment 4, March 26, 2019



Figure 12. Restoration evaluation near TSP 55 in Segment 4, March 26, 2019

3.2.1 Notice to Proceed Request

The applicant must obtain CPUC authorization before initiating construction activities through the NTP process. The NTP process involves the applicant submitting an NTP request to the CPUC and the CPUC Project Manager issuing an NTP authorization letter. The CPUC Energy Division will only issue an NTP for a project if all applicable preconstruction requirements for the relevant stage of the project are satisfied. In addition, resource-specific plans and reports must comply with the goals, performance standards, and associated MMs and PCs.

In general, multiple NTPs are issued for large-scale projects with various components allowing for a phased construction review process where compliance with all applicable mitigation measures and conditions are documented. The SBCRP included various components (material yards, substations, distribution, telecommunications, and transmission). Accordingly, SCE requested three NTP requests from the CPUC to authorize the start of certain phases of the SBCRP. The applicant submitted NTP

requests with the following information, as described in the MMCRP, to confirm that the applicant complied with the CEQA document:

- Descriptions of the work to be performed, including a brief comparison of the proposed work and the project component, as described in the Final EIR;
- Descriptions of all ancillary activities required for the project component or components (e.g., electrical, plumbing, excavation, paving, landscaping, site restoration);
- Identification of any staging areas that would be used during construction;
- Detailed descriptions of the location of the project component or components covered in the NTP, including maps, photographs, and other supporting documents;
- An estimate of the area of total new land disturbance associated with project component or components;
- The date of expected construction and the duration of work;
- The anticipated number of construction workers, including the total workers and peak number;
- The anticipated equipment required for construction;
- Verification that all relevant preconstruction MMs and PCs have been completed or implemented;
- Verification that all applicable jurisdictional permits or agency approvals have been obtained for the work covered by the NTP request, if required;
- If some preconstruction compliance items could not be completed prior to issuance of the NTP, an identification and description of the outstanding submittals, as well as how they would be completed and approved in a timely manner prior to construction; and
- Up-to-date biological resource surveys or a commitment to survey and submit results prior to construction.

WSP reviewed the applicant-provided NTP requests and the applicable preconstruction requirements to ensure completeness. Additional information or clarification was requested from the applicant if needed. The NTPs that were approved for the project are described in Table 3.

Table 3. Notices to Proceed

NTP Number	Approval Date	Description
1	October 21, 2016	NTP-1 activities included vegetation management, establishing and temporarily using Staging Yards 1A, 1B, 2, 4, 5, 8, 11A, 11C, and the Teen Challenge Yard in Ventura County.
2	May 23, 2017	NTP-2 activities included vegetation management, establishing and temporarily using the approved Staging Yards in Ventura County.
Amendment	March 15, 2018	Additionally, activities included modification removal, or installation of towers, TSPs, lattice steel towers, LWS poles, and foundations in Segments 1, 2, 3B, portions of Segment 4, Getty Tap, and Casitas Substation; telecommunication cable installation and undergrounding in Segments 1 and 2, portions of Segment 4, and Santa Clara and Casitas substations; and substation work at Santa Clara, Casitas, and Getty substations. Furthermore, an amendment to NTP-2 was approved on March 15, 2018, for the addition of a helipad at Ventura Service Center for helicopter storage.
3	May 23, 2017	NTP-3 activities included vegetation management, establishing and temporarily using the approved Staging Yards in Ventura County. Furthermore, activities included modification, removal, or installation of TSPs, lattice steel towers, LWS poles, and foundations in Segments 3A, 3B, 4, 5, and Carpinteria Substation; telecommunication cable installation and undergrounding in Segment 4 and Carpinteria Substation; substation work at Carpinteria, Ortega, and Goleta substations; and development of Staging Yards 9 and 10.

3.2.2 Minor Project Refinement Request

The applicant prepared several MPR requests and submitted them to the CPUC and WSP for review. The MMCRP outlined procedures and requirements for MPR requests. The CPUC and WSP reviewed all MPR requests to ensure any proposed deviations from the approved project were consistent with approved CEQA requirements. Correspondingly, the MPRs did not trigger additional permit requirements, did not increase the severity of an impact or create a new impact, and were within the geographic scope of the Final EIR.

WSP reviewed MPR requests for completeness, and additional information or clarification was requested from the applicant as needed. After review and analysis, WSP would recommend approving or denying a request to the CPUC. Table 4 summarizes the MPRs submitted for the SBCRP.

Table 4. Minor Project Refinements and Authorizations

MPR	Associated NTP	Approval Date	Description
A	NTP-1	October 21, 2016	MPR-A involved the use of the Teen Challenge Yard as a laydown yard instead of laydown Yard 6 identified in the Final EIR.
B	NTP-1	April 12, 2018	MPR-B activities involved the removal of idle poles throughout the project area.
C	NTP-2	May 3, 2018	MPR-C activities involved constructing a temporary access road to Construct 97 while permit procurement with the Los Padres National Forest was ongoing.
D	NTP-2	May 25, 2018	MPR-D involved the use of an alternative existing access road to remove Tower M8-T2. The access road required trimming of oak trees but eliminated portions of the previously disturbed access road and reduced impacts on an avocado orchard.
E	NTP-1	July 3, 2018	MPR-E involved use of an alternative existing access road to remove Tower M7-T4 due to the access road approved in the Final EIR being washed out. The proposed access road required trimming of one oak tree and some avocado trees but did not require grading.
F	NTP-2	November 2, 2018	MPR-F involved the modification in size of the stabilization wall (welded wire wall), erosion control berm, access road (Level 5), crane pad, and temporary and permanent grading limits at Construct 97.

3.3 Compliance During Construction

Compliance monitoring was performed prior to and during construction through email, phone conversations, meetings, site inspections, and various forms of documentation described in this document. Additionally, the applicant provided CPUC-approved biological, cultural, and paleontological monitors for daily monitoring. The CPUC compliance monitoring team conducted regular site inspections, either biweekly during construction or as determined by the WSP Compliance Manager, for a total of 38 site visits. The CPUC Compliance Monitor's site visit reports were attached to a Monthly Report that WSP prepared each month for the CPUC.

3.3.1 Compliance Requirements During Construction

This section describes compliance activities performed as required by approved mitigation measures once CPUC granted construction authorization. Section 3.1 describes the preconstruction compliance requirements that had to be satisfied before construction at specific locations. These preconstruction compliance requirements were implemented throughout construction because the start of construction was phased over the years. Section 3.1.1 describes the various compliance plans that had to be submitted and approved before construction and their implementation. The construction and restoration of the project are shown in Section 3.4. The CPUC compliance monitoring team field validated the implementation of construction compliance requirements.

Aesthetics

- **MM AE-1: Minimize Permanent Disturbance Aesthetic Impacts.** SCE and its contractors implemented methods to restore permanent disturbed areas to conditions that would blend with the overall landscape and character to the extent feasible. Correspondingly, a Surface Treatment Plan was implemented to minimize glare and color contrast.
- **MM AE-2: Construction Site Upkeep.** All project personnel completed the WEAP training, which included the importance of cleaning up trash and minimizing trash on the Project. The contractor monitored the cleanliness of the Project during construction and post-construction activities. Additionally, SCE uploaded WEAP training logs in the FRED document library.

Moreover, as described in Section 2.3.1 of the SBCRP Final EIR, construction of the Project required establishing temporary staging areas. As a result, NTP-1 authorized the establishment and temporary use of staging areas in Ventura County (Staging Yards 1A, 1B, 2, 4, 5, 8, 11A, 11C, and the Teen Challenge Yard) that were listed in the Final EIR and identified as suitable for the SBCRP. NTP-2 did not require establishment of yards since the staging yards utilized for SBCRP activities within Ventura County were previously approved under NTP-1. Additionally, NTP-3 authorized the establishment of temporary use of Staging Yards 9 and 10 in Santa Barbara County.

- Under NTP-1: Construction trailers were placed where necessary at Staging Yards 1A/1B, 11A, and the Teen Challenge Yard. Electrical services were provided either by portable generator or by temporary electrical line strung between an existing SCE pole and the trailer. Additionally, temporary chain link fence and temporary gates were installed at Staging Yards 2, 11A, and at the Teen Challenge Yard. Furthermore, portions of the access roads leading to Staging Yards 2 and 11A/C required level 3 improvements.
- Under NTP-3: Material staging and contractor show-up occurred at Staging Yards 9 and 10. Staging Yard 10 included a helicopter landing area to support SBCRP helicopter operations. Additionally, portable sanitation facilities and construction trailers were placed at both Staging Yards and electrical service was provided by portable generators. Furthermore, containers (e.g., conex boxes) were placed at Staging Yards 9 and 10, as necessary.
- **MM AE-3: Reduce Aesthetic Impacts of Retaining Walls and Access Road Improvements.** Aesthetic impacts of retaining walls, other mechanically stabilized embankments (MSEs), and access road improvements (e.g., cut and fill slopes) visible to the public were reduced through application of techniques that minimized contrast with colors, forms, and textures within the surrounding landscape setting. Visible portions of concrete crib walls, other MSEs, and cut and fill slopes with exposed soil and/or rock used finish colors and/or surface applications to blend these structures with their surroundings. Compliance was verified by monitoring activities, as outlined in the SBCRP Biological Resources Daily Monitoring Reports.
- **MM AE-4: Glare and Color Contrast Reduction for Transmission Structures and Conductors.** Structure treatment/types were submitted to SCE (and CPUC) prior to procurement. Additionally, SCE prepared a Surface Treatment Plan that was approved by the CPUC. As a result, materials were used to minimize glare and color contrast. Application of glare-reducing Natina treatment to transmission structures was monitored in the field and CPUC-verified in Biological Resources Daily Monitoring Reports.

Air Quality

- **MM AQ-1: Tier 3 and 4 Off-Road Emissions Standards.** The equipment used on the SBCRP met Tier 3 and Tier 4 off-road emissions standards except for a Sag Cat with three winches (specialized equipment) to support conductor activities necessary to construct the SBCRP as approved in the FEIR. The use of specialized equipment that may not meet Tier 3 or 4 requirements was anticipated in the FEIR (Sections 4.3). The CPUC was provided advanced notification in compliance with MM AQ-1 for the use of equipment greater than 75-horsepower that did not meet Tier 3 or 4 off-road emissions standards.

Biological Resources

- **MM BR-1: Limit Construction Activities Project Boundaries and Sensitive Areas Clearly Marked.** SCE marked disturbance limits throughout the SBCRP. In addition, Environmentally Sensitive Areas were marked, staked, and monitored for compliance. Monitoring reports were prepared and uploaded in FRED. If additional disturbance was required outside the established construction areas, SCE submitted a notification and request to CPUC for approval.
- **MM BR-2: Timing and Location Stipulations.** CPUC-approved biologists performed pre-construction surveys and construction sweeps, documentation, protection, monitoring, and reporting for special-status plant and wildlife species. Additionally, SCE used baseline information for the composition of vegetation communities and compliance with the Habitat Restoration and Mitigation Plan.
- **MM BR-3: Noxious and Invasive Weed Control Plan.** The CPUC approved a NIWCP in May 2016. Pre-construction surveys and construction sweeps, documentation, monitoring, and reporting of noxious and invasive weeds were conducted by CPUC-approved qualified biologists. The contractor implemented the BMPs in the NIWCP and completed removal activities during pre-construction, construction, and restoration. Compliance was documented in Biological Resources Daily Monitoring Reports, Incident Reporting Forms, Species Events, and Restoration Installation Forms and was uploaded in FRED.
- **MM BR-4: Limit Removal of Native Plants, Trees, and Natural Communities.** SCE verified that appropriate staking and flagging were completed to ensure clearing, grading/ access road building, and construction remained within work limits. In addition, biological monitors documented that each work site was marked with staking or flagging to delineate the work boundaries and that the stakes or flagging remained in place during construction. Furthermore, qualified arborists were consulted and monitored the impacts on protected trees. SCE reported compliance documentation for MM BR-4 in FRED. This effort included areas where an impact to sensitive biological resources or jurisdictional waters, vegetation removal, trimming, or disturbance to vegetation could occur, as well as all ground disturbing work activities and initial “drive and crush” in work areas and access roads.
- **MM BR-5: Habitat Restoration and Mitigation.** A Biological Assessment (in April 2015) and Supplement (in March 2016) were prepared, and a Biological Opinion from the USFWS was received in September 2016. Pre- and during-construction surveys, documentation, protection, monitoring, and reporting of California red-legged frogs, and suitable habitat were conducted by CPUC-approved qualified biologists and USFWS-approved red-legged frog biologists following the BO. Compliance was documented in Biological Resources Daily Monitoring Reports, Incident Reporting Forms, and Species Events and uploaded in FRED.

- **MM BR-6: Wildlife Protection.** The applicant installed covers, ramps, and/or fencing to avoid trapping wildlife in excavation or trenches. Monitoring reports in FRED included documentation of compliance with this measure. Furthermore, pre-construction surveys and construction sweeps, documentation, protection, monitoring, and reporting to protect wildlife and contain trash were conducted by CPUC-approved qualified biologists. Compliance was documented in Biological Resources Daily Monitoring Reports, Incident Reporting Forms, and Species and Mortality Events in SCE's FRED.
- **MM BR-7: Night Lighting.** Pre-construction surveys and construction sweeps, documentation, protection, monitoring, and reporting to protect wildlife were conducted by CPUC-approved qualified biologists. The contractor shielded and directed lighting to minimize spillover onto adjacent properties and impacts on local wildlife. Compliance was documented in Biological Resources Daily Monitoring Reports and Incident Reporting Forms and was uploaded in FRED.
- **MM BR-8: Impact Reduction on Hydrologic Features and Aquatic Habitat.** A Hydrological Features Mitigation and Monitoring Plan was approved by the CPUC in June 2016 and necessary permits were obtained. Mitigation credits were purchased at the Santa Paula Creek Mitigation Bank (SPCMB). SWPPP BMPs were verified through construction monitoring and by inspection by a QSP. Pre-construction surveys, documentation, protection, monitoring, and reporting of jurisdictional features were conducted by CPUC-approved qualified biologists. Compliance was documented in Biological Resources Daily Monitoring Reports, Incident Reporting Forms, and Tree events and was uploaded in FRED. Temporarily impacted areas were restored as close to pre-construction conditions as possible (see Attachment A).
- **MM BR-9: California Red-Legged Frog Impact Reduction Measures.** A Biological Assessment (in April 2015) and Supplement (in March 2016) were prepared, and a Biological Opinion from the USFWS was received in September 2016. In addition, pre- and during-construction surveys, documentation, protection, monitoring, and reporting of California red-legged frogs, and suitable habitats were conducted by CPUC-approved qualified biologists and USFWS-approved red-legged frog biologists following the BO. Compliance was documented in Biological Resources Daily Monitoring Reports, Incident Reporting Forms, and Species Events and uploaded in FRED.
- **MM BR-10: Nesting Bird Management Plan.** The CPUC approved the SBCRP NBMP in July 2016. Pre-construction surveys, documentation, protection, monitoring, and reporting of nesting birds were conducted by CPUC-approved qualified biologists following guidelines in the Nesting Bird Management Plan. Additionally, lead biologists established nest buffers as necessary, and the contractors complied with nest buffer avoidance during construction. SCE documented compliance with the NBMP (in weekly and annual nesting bird reports, helicopter tracks, and species management memos. See also Biological Resources Daily Monitoring Reports, Incident Reporting Forms, Bird Nest Events, and Buffer Reduction Requests) and were uploaded in FRED.
- **MM BR-11: Burrowing Owl Impact Reduction Measures.** The CPUC-approved avian biologists performed surveys and monitored for active Burrowing Owl sites. A lead biologist established a 300-foot buffer for avoidance if an active nest was discovered. Additionally, the contractor complied with nest buffers during construction. As a result, no project-related impacts on burrowing owls occurred.

- **MM BR-12: Southwestern Willow Flycatcher and Least Bell's Vireo Impacts Reduction Measures.** A Biological Assessment (in April 2015) and Supplement (in March 2016) were prepared, and a Biological Opinion from the USFWS was received in September 2016. Qualified biologists conducted pre- and during-construction surveys, documentation, protection, monitoring, and reporting of southwestern willow flycatcher, least Bell's vireo, and yellow-billed cuckoo in suitable habitat. Additionally, CPUC-approved avian biologists performed surveys and monitoring during construction. Compliance was documented in Biological Resources Daily Monitoring Reports, Incident Reporting Forms, and Species Events and was uploaded in FRED.
- **MM BR-13: Ringtail and American Badger Impacts Reduction Measures.** Pre-construction surveys, documentation, protection, monitoring, and reporting for ringtails and American badgers were conducted by CPUC-approved qualified biologists. No ringtail or American badger-occupied dens or burrows were observed. Surveys were performed, and observations were recorded in Biological Resources Daily Monitoring Reports, Incident Reporting Forms, and Habitat and Species events and uploaded in FRED.
- **MM BR-14: O&M Mitigation.** During O&M activities, the SBCRP adhered to all applicable APMs and MMs identified in the MMRP. Additionally, SCE submitted to the CPUC environmental reviews before conducting O&M activities that required ground disturbance or vegetation clearance, including tree trimming, to determine potential risks to resources and whether additional permitting is required.

Cultural Resources

- **MM CR-1: Additional Cultural Resources Surveys.** Garcia and Associates (GANDA) performed cultural resource assessments as part of the NTPR process. Additionally, they reviewed all new proposed work areas and conducted surveys for the applicant as necessary.
- **MM CR-2: Avoid Known Cultural Resources.** The CPUC approved the Cultural Resources Plan. The contractor provided GANDA with the construction schedule in order to prepare a monitoring schedule. As a result, GANDA monitored ground disturbance activities and documented compliance with the CRP in FRED.
- **MM CR-3: Qualified Cultural Resources Consultant.** GANDA performed archaeological monitoring and uploaded archaeological monitoring reports in FRED.
- **MM CR-4: Cultural Resources Plan.** The CPUC approved the SBCRP Cultural Resources Plan. Accordingly, CPUC-approved qualified archaeological monitors conducted full-time construction monitoring in areas with high archaeological sensitivity. Monitoring consisted of the visual inspection of construction activities including any trench sidewalls and excavated or graded areas for roadways and structures. No cultural resources were discovered during construction that could not be avoided. Additionally, monitoring reports were submitted to the CPUC.
- **MM CR-5: Native American Consultation and Participation Planning.** A Native American Participation Plan was approved by the CPUC in October 2016. GANDA, under contract with H&M and in coordination with Rincon provided archaeological construction monitoring to SCE for the SBCRP. Additionally, SCE ensured coordination with Native American monitors to have them present during construction activities as necessary and as determined by the Native American tribes. GANDA and Rincon documented the presence of Native American monitors during construction in FRED.

- **MM CR-6: Construction Monitoring.** Protection, monitoring, documentation, and reporting of cultural resources, including unanticipated discoveries, were conducted by CPUC-approved qualified archaeologists. One archaeological site was disturbed during emergency road repairs related to the Thomas Fire (i.e., non-project related). No cultural resource were discovered during construction that could not be avoided. Compliance was documented in Cultural Resources Daily Monitoring Reports, Incident Reporting Forms, and uploaded in FRED.
- **MM CR-7: Stop Work for Unanticipated Cultural Resources Discoveries.** In the event that human remains were discovered during construction, all work would be diverted from the discovery area, and SCE would inform the CPUC immediately. In addition, the remains were to be treated following applicable laws concerning human remains, including: CEQA Guidelines section 15064.5(e); PRC sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code section 7050.5. No human remains were discovered during construction.
- **MM CR-8: Testing and Evaluation Plan.** No unanticipated cultural resources were discovered during construction, and therefore, an archaeological Testing and Evaluation Plan was not required.
- **MM CR-9: Data Recovery Plan.** No unanticipated cultural resources were discovered during construction, and therefore, an archaeological Data Recovery Plan was not required.
- **MM CR-10: Cultural Resources Reporting.** Protection, monitoring, documentation, and reporting of cultural resources, including unanticipated discoveries, were conducted by qualified archaeologists. Cultural Resources Daily Monitoring Reports and Incident Reporting Forms were uploaded in FRED. Additionally, an SBCRP Archaeological Monitoring Final Report was submitted to the CPUC
- **MM CR-11: Paleontological Monitoring and Treatment Plan.** A Paleontological Monitoring and Treatment Plan was prepared in December 2014 and implemented during construction. Protection, monitoring, documentation, and reporting of paleontological resources were conducted by CPUC-approved qualified paleontologists. Compliance was documented in Paleontological Resources Daily Monitoring Reports, Incident Reporting Forms, and uploaded in FRED.
- **MM CR-12: Qualified Paleontological Consultants.** John Minch and Associates, Inc. (JMA) implemented a Paleontological Monitoring and Treatment Plan during ground disturbance activities for the SBCRP. JMA laboratory and field personnel included Supervising paleontologists and Paleontological Monitors. All paleontological personnel were CPUC-approved to ensure required education and experience levels for paleontological resource work on the SBCRP.
- **MM CR-13: Paleontology Construction Monitoring.** The construction of earthen equipment pads and, to a lesser extent, the drilling of tubular steel pole (TSP) foundations were the main focus of paleontological monitoring due to the comparative potential impact on paleontological resources. Equipment pad construction consisted of bulk excavation and spoils processing over the course of days or weeks. The relatively deep (up to ~3 m) and large footprints (up to 40 m²), combined with the constant processing of colluvium and rock, increased the potential for fossil discovery in these areas. The drilling of TSP foundations primarily involved using an excavator-mounted foundation drill, a backhoe loader, and a skid-steer loader. Due to the lack of visible paleontological resources in excavations, the Supervising Paleontologist determined that sample sediment washing, per the PMTP, was not necessary.

Additionally, protection, monitoring, documentation, and reporting of paleontological resources, including unanticipated discoveries, were conducted by CPUC-approved qualified paleontologists. Compliance was documented in Paleontological Resources Daily Monitoring Reports, Incident Reporting Forms, and uploaded in FRED.

- **MM CR-14: Stop Work for Unanticipated Paleontological Discoveries.** A total of four fossil localities were identified during SBCRP construction (see Section 3.4 for additional details). In accordance with MM CR-14, ground-disturbing work was halted or diverted away from the discoveries until a CPUC-approved paleontological monitor inspected the site. No paleontological resources were discovered during construction that could not be avoided.
- **MM CR-15: Cultural and Paleontological Resources Training Requirements.** A Worker Environmental Awareness Program covering cultural and paleontological resources was prepared and implemented. Furthermore, WEAP Training Sign-in Sheets and Incident Reporting Forms were updated and uploaded in FRED.

Geology, Soils, and Minerals

- **MM GEO-1:** During construction, SCE conducted maintenance patrols to identify areas of active slope instability and submitted an annual report to the CPUC. Additionally, the SBCRP adhered to SWPPP requirements, including installing BMPs throughout the SBCRP work areas for sediment control and minimizing erosion impacts.

Hazards

- **MM HZ-1: Contaminated Soil/Groundwater Contingency Plan.** The CPUC approved the Contaminated Soil and Groundwater Contingency Plan in May 2016. Additionally, workers received training relevant to the Contaminated Soil and Groundwater Contingency plan via the WEAP, site-specific safety training, and tailboard meetings throughout construction. WEAP training logs were kept and submitted to the CPUC as necessary. If stained or odorous soil or groundwater was encountered, workers were to stop work and notify the environmental field representatives. Additionally, the Contaminated Soil and Groundwater Contingency Plan was to be followed, including notification, storage, testing of materials, and disposal.
- **MM HZ-2: Fire Control and Emergency Response Plan.** SCE, in consultation with their contractors, developed a site-specific fire control and emergency response plan to address the risk of fire or other emergencies (e.g., flooding) during construction, operation, and maintenance of the Project. The CPUC approved SCE's FCERP in August 2016. During construction, the CPUC verified the implementation of the FCERP. Accordingly, SCE and its contractor provided a full-time Fire Risk Manager to support compliance with the FCERP. Additionally, project personnel received fire hazard training prior to starting construction. WEAP training logs were updated as necessary and uploaded in FRED.

Noise

- **MM NV-1: Noise Reduction and Control Practices.** Prior to the start of construction, SCE prepared and submitted a Noise Control Plan that the CPUC approved in May 2016. Noise monitoring was conducted to assess the need for noise reduction and control practices. It was determined that no noise reduction and control practices were required. Affected parties were notified prior to helicopter flights. All relevant notifications were documented and uploaded in FRED. Furthermore, Project personnel received training regarding compliance with the Noise Control Plan in the WEAP, and training logs were submitted to the CPUC.

Public Services and Utilities

- **MM PS-1: Water Efficiency Plan.** The WEP was submitted to the CPUC and approved in September 2016. The WEP detailed SCE's attempts to secure reclaimed water. As a result, no potable water was required for use during construction activities since an efficient reclaimed water supply was obtained for SBCRP.
- **MM PS-2: Solid Waste Management Plan.** The SWMP was submitted to the CPUC and approved in May 2016. The SWMP outlined how SCE will sort, measure, and record the disposal of solid waste to ensure that no more than 350 tons of solid waste is delivered to a Santa Barbara County-operated solid waste disposal facility and that at least 60% (by weight) of construction debris will be diverted through either reuse or recycling. Additionally, SCE adhered to reporting requirements to the CPUC, Santa Barbara County, and Ventura County. Reporting included biannual progress reports as well as notification to Santa Barbara County if the project's capacity at Santa Barbara County-operated solid waste disposal facilities is reached. Documentation of compliance was uploaded in FRED.

Recreation

- **MM RE-1: Notification of Trail Closure.** Trail users were notified in accordance with MM RE-1. Accordingly, SCE coordinated with the City of Carpinteria Parks and Recreation Department, the County of Ventura Parks Department, the Santa Barbara County Parks Department, and the Land Trust for Santa Barbara County for their respective parks, to determine appropriate locations to post notifications, such as trailhead kiosks, access points, or the departments' websites. Copies of correspondence and notifications were uploaded in FRED.

Traffic

- **MM TT-1: Traffic Control Plan.** As part of the encroachment permit procurement process, SCE submitted a Traffic Management and Control Plan that the CPUC approved in May 2016. Additionally, prior to the start of construction, project personnel received training on transportation and traffic measures in the WEAP training. WEAP training logs were updated as necessary and submitted to the CPUC for verification.
- **MM TT-2: Helicopter Safety Plan.** SCE's air operations team coordinated with the FAA to obtain FAA-required approvals, including but not limited to a Helicopter Safety Plan for operations within congested areas or residences. As a result, the SCE air operations team received FAA approval of the plan prior to helicopter operations and submitted approval documentation to the CPUC.
- **MM TT-3: Notification and Monitoring of Helicopter Use.** Per MM TT-3, SCE notified the Van Nuys Flight Standard District Office at least one week in advance of all days during which helicopter operations were planned to occur or as required by the Flight Standards District Office. Furthermore, SCEW notified residents, businesses, and owners of property within 0.25 miles of planned or emergency helicopter flight paths and landing areas at least one week in advance of all days during which helicopter operations were planned to occur. Furthermore, in accordance with the Code of Federal Regulations, Title 14: Aeronautics and Space, Part 133, the loading and unloading of all helicopter external loads were monitored by a non-apprentice lineman and certified by SCE to rig and inspect external helicopter loads. Zero accidents were reported during SBCRP construction activities, including helicopter operations. Copies of correspondence and notifications were uploaded in FRED.

- **MM TT-4: Repair of Damaged Trails.** SCE documented trail and access road conditions prior to construction with photographs along roads identified for heavy vehicle use. Additionally, SCE photographed the areas after completion of the SBCRP Project and after any repairs to document the restoration of pre-project conditions. SCE submitted post-construction and restoration photographs to the CPUC for verification.

3.3.2 Non-compliance Reports

A non-compliance is defined as “any construction activity that deviates from permit conditions, NTPs, APMs, or mitigation measures, particularly when the activity puts a sensitive resource at risk” according to MMCRP Chapter 3.5. The Non-compliance Levels are detailed in the MMCRP and consist of the following levels: Minor Compliance Incident, Non-compliance Level 1, Non-compliance Level 2, and Non-compliance Level 3. Non-compliance issues were either self-reported by the applicant or by the CPUC Compliance Monitor. Thus, the CPUC Compliance Monitor performed a total of 38 site visits during construction and observations including minor compliance incidents were reported in the Monitoring Reports prepared and issued by WSP. Additionally, as described in Section 3.2 Construction, SCE provided monitors to ensure that construction activities were conducted in accordance with the required mitigation measures, APMs, permit conditions, and plan requirements. SCE developed a system to categorize and report on observed non compliances as summarized below.

- Observation and Maintenance Items (Observation or Level OB) included observed deviation from a Project requirement but may have resulted in a future incident if not addressed. Additionally, Observations were used to capture field issues that were not Project-related, but occur near the Project area (i.e., non-project related dumping of trash, driving outside of approved access routes, etc.). Regarding cultural or paleontological resources, observations involved isolated finds that were either not significant or lack historical information and were not indicative of a potential lack of compliance.
- Level 1 Non-compliance Incidents (Minor Incidents or Level 1) are activities that result in a minor deviation from a Project Requirement. Repetitive infractions of a particular Project Requirement can result in subsequent similar incidents being elevated to the next level.
- Level 2 Non-compliance Incidents (Moderate Incidents or Level 2) are activities that deviate from Project requirements and result in direct impacts to sensitive resources. Level 2 Non-compliance Incidents can be resolved without a significant delay in construction activities. However, if the problem is not addressed in a timely matter, or conditions continue to worsen, the incident can be elevated to the next level.
- Level 3 Non-compliance Incidents (Major Incidents or Level 3) are activities that significantly deviate from or violate Project Requirements and require notification to the regulatory agencies. These incidents require an immediate work stoppage and coordination with the agencies on a course of action.

A summary of incidents by level and type as monitored by SCE and their contractors are summarized in Table 5. All incidents and observations recorded during Project construction are documented in SCE’s FRED. A total of 224 incidents were entered in FRED during construction.

Table 5. SBCRP: Summary of Incidents

Incident Level	Type	Total
Observation	Biological (Non-project related)	159
Observation	Biological	64
Observation	Cultural (Non-project related)	1
Level 1	Biological	20
Level 1	Regulatory Requirement	1
Level 1	WEAP	1
Level 2	Biological	6
Total		252

Source: SCE FRED, 2022.

Key:

WEAP = Worker Environmental Awareness Program

As aforementioned, the CPUC environmental compliance team also monitored the SBCRP construction activities to ensure that they were conducted according to the required mitigation measures, APMs, permit conditions, and compliance plan requirements. A non-compliance incident may be discovered by the CPUC compliance monitoring team (offsite) or by the CPUC Compliance Monitor (on-site) during a site visit. If non-compliance was identified, the issue was brought to the attention of SCE and/or their contractor's Environmental Field Lead. Additionally, non-compliance was documented in the Monitoring Reports prepared by WSP if it was promptly addressed. On the other hand, if the non-compliance was not adequately addressed or self-reported, a CPUC Incident, Project Memorandum, and/or a Non-Compliance Report was issued based on the severity of the violation and in accordance with the MMCRP section 3.4.1 Non-Compliance Incident Level and SCE's non-compliance levels. A summary of incidents by level and type as monitored by the CPUC compliance monitoring team are summarized in Table 6.

Table 6. CPUC Compliance Monitor Non-Compliance Reporting

Date	SBCRP Project/Regulatory Requirement	Location	Description	Follow-up/Corrective Actions
Observations				
12/21/2017	Non-project, Other	Near Teen Challenge Yard and C68	The non-project related Thomas Fire burned areas near Construct 68 and around the Teen Challenge Yard (the fire did not reach inside the fence).	N/A. The high winds were a concern creating poor visibility and air quality. All crew members had access to appropriate masks.
12/21/2017	SWPPP	Near Carpinteria Substation	Fresh concrete spilled onto the public roadway by a concrete truck turning onto the Segment 4 access road.	SCE and/or their contractor were notified. The construction crew immediately removed he spilled concrete from the road.

2/22/18	Non-project, Other	Near C126 and C127	The immediate areas around the TSPs at Constructs 126 and 127 had been burned during the non-project related Thomas Fire. New vegetation was slowly re-growing.	N/A. The access road to this location was scheduled for minor improvements; however, emergency crews for the Thomas Fire widened and graded the road. As a result, SCE no longer needs to make improvements, but BMPs (e.g., water bars and gravel bags to stabilize the area) will still be necessary.
4/20/2018	SWPPP	Near TSP 99	A parked drill rig was leaking fluids. Pans had been placed underneath the equipment, but the fluid was running off the pans into the soil due to the steep slope.	SCE and/or their contractor were notified. A mechanic was called to fix the leak and the soil was cleaned up in accordance with the SBCRP Contaminated Soil Contingency Plan.
7/27/2018	SWPPP	Near TSP 120	At one of the creek crossings, a water truck had attempted to turn around and slightly slid off the road, resulting in impacts to a portion of the road berm next to the culvert.	SCE and/or their contractor were notified. Additional BMPs were installed to stabilize the area.
7/27/2018	SWPPP	Near TSP 120	Due to limited parking, equipment and vehicles were stockpiled and parked at several staging areas. One construction vehicle had a fuel spill in the bed of the truck that was leaking from the tailgate.	SCE and/or their contractor were notified. Additional BMPs were placed, and the spill was contained and cleaned appropriately.
8/10/2018	SWPPP	Near TSP 120	Excess soil that was spread west of a steep road was sloughed into vegetation. The area required BMPs to be installed or upgraded.	SCE and/or their contractor were notified. The contractor placed soil back onto the road and installed additional BMPs.
8/22/2018	SWPPP	Highway 150 Yard	The silt fencing in the yard was broken and had fallen over.	SCE and/or their contractor were notified. The perimeter silt fencing was repaired.
8/22/2018	SWPPP	Near TSP 97	Inadequate dust control measures on an access road connecting to Highway 150.	SCE and/or their contractor were notified. Additional dust suppression was conducted.

9/18/2018	SWPPP	Near C-96	Trackout onto Highway 150.	SCE and/or their contractor were notified. A sweeper was called and cleaned the trackout. The sweeper was scheduled to frequently clean the road at Highway 150 in accordance with APM AQ-1.
10/5/2018	Biological	Near TSP 112	Construction equipment was parked under an oak tree and within disturbance limits. No impacts to the oak tree were observed.	The equipment was moved to different location and the area was scheduled to be restored to its pre-existing conditions.
10/18/2018	SWPPP	Near TSP 67	A few erosion rills caused by agricultural irrigation were observed underneath jute netting. Neither the jute netting nor the straw wattles were staked at the top of the slope. Proper jute netting installation and staking would help prevent water from running under the jute.	Proper staking and adjustments to the jute netting installation was performed to support restoration activities in this area.
11/16/2018	SWPPP	Near TSP 107	Disturbed locations needed additional BMPs placed onto slopes. Secondary containment (e.g., drip pans) were needed underneath parked equipment (e.g., bulldozer, excavator, compactor, and gas can).	The SCE EPM was notified. Additional BMPs and secondary containment were installed as necessary.
11/16/2018	SWPPP	Near TSP 97	The access roads to TSP 97 and small parking area along Highway 150 was significantly dusty.	SCE was notified and dust control concerns were addressed.
2/26/2019	Biological	Near TSP 112	Several oak tree roots appeared to be impacted and were exposed following grading.	The SCE EPM was notified, and soil was delivered to cover the exposed roots. The area was hydroseeded and restored to its pre-existing condition.
3/26/2019	Non-project, Biological	Near TSP 56	Non-project related cattle grazing impacted restoration activities including performance of restoration and BMPs	Non-project related impacts were recorded.

3/26/2019	Non-project Biological, SWPP	Near TSP 80	Non-project related cattle grazing impacted restoration performance. Additionally, stormwater runoff erosion issues were observed.	Non-project related impacts were recorded. Additional water bars and BMPs were installed.
8/21/2019	Non-project, Other	Near Sutton Creek	A temporary bridge over Sutton Creek that was installed for non-project related work was removed, leaving a dirt road crossing. A large pile of rock and soil was left within the riparian corridor.	N/A

Incidents

Level 1

None

Level 2

9/20/2017 – 11/21/2017	Biological Resources	Multiple locations	Construction work outside of disturbance limits; working in areas before appropriate clearance sweeps were performed; improper staging of materials; trackout	Contractors were reminded of their commitments to support mitigation requirements concerning clearance sweeps and disturbance limits and the associated repercussions for infractions. Additional ESA flagging and signage was implemented in areas where crews have worked outside of disturbance limits and in areas that may be difficult to see. Furthermore, fencing was installed adjacent to sensitive resources (e.g., special status plant populations, high-risk encroachment areas). ESA signage was to be inspected on a regular basis for damage or interventions by landowners.
5/1/2018	Biological Resources	Segment 3B near Construct 62	Construction work encroached within an active red-tailed hawk 500-foot nest buffer and California red-legged frog ESA	Immediate stop-work order was issued. A bulldozer operator was alerted, ceased operation, and immediately removed the equipment from the area. Additionally, the contractor’s Environmental Manager coordinated with the civil and construction managers and met with the individual who encroached within the buffer to reiterate the nest buffer requirements. The incident was also discussed during at the tailboard meeting the next day.

7/17/2018	Biological Resources	Segment 4 near Construct 130	Construction work outside of disturbance limits. Disturbance resulted in three gallons of soil from a berm to slough into Franklin Creek. No riparian vegetation, trees, wildlife, or special status species were impacted, and no flowing water was present. ESA signage was present and installed correctly.	An excavator was used to life the water truck back onto the access road. Construction crews removed eroded sediment from the creek bed and stabilized the creek bank using hand tools. A straw wattle was installed at the top slope to prevent further erosion. SCE notified CDFW of the impacts and the water truck operator was suspended.
9/19/2018	Biological Resources	Segment 3B at Construct M5-ST-5	Construction work outside of disturbance limits; working in areas before a biological clearance sweep	Immediate stop-work order was issued. It was determined that the contractor believed that the work was similar to previous work (CPUC exempt action) and did not require monitoring. The contractor management team corrected that assumption and let the crew know that the remaining abandoned facility work is all related to the SBCRP, and therefore subject to the project mitigation measures. Additionally, a management step for approving any “project” vs “non-project” work was incorporated.

Level 3

None

Project Memorandum

None

Non-Compliance Reports (NCR)

NCR#	Date of Issuance	APMs/MMs Affected	Proposed Resolution/Timeline for Follow-up
NCR-1	On January 8, 2018, the CPUC issued NCR-1 for the Level 2 Incident that occurred from 9/20/2017 – 11/21/2017 (see description above)	APM BIO-2 MM BIO-1 MM BIO-2 MM BIO-8	CPUC requested that SCE submit a response plan outlining how and when they will remind contractors about their responsibilities under mitigation measures and the associated repercussions and potential fines for non-compliance issues. The CPUC requested that the response plan be submitted by January 31, 2018. The SCE/contractor response plan was submitted to the CPUC on January 31, 2018.

NCR-2	On May 5, 2019, the CPUC issued NCR-2 for the Level 2 Incident that occurred on 5/1/2018 (see description above)	MM BIO-1 MM BIO-10	The CPUC agreed with SCE’s responses to the incident, however, biological resources were put at risk, which not only violated project requirements, but also had the potential to violate federal and state regulations. All project personnel were reminded of their responsibilities and the repercussions and potential fines for non-compliance issues.
NCR-3	On August 6, 2018, the CPUC issued NCR-3 for the Level 2 Incident that occurred on 7/17/2018 (see description above)	CDFW Streambed Alteration Agreement MM BIO-1 MM BIO-8	The CPUC agreed with SCE’s immediate response to the incident, however, additional measures taken, such as crew retraining on appropriate turnaround locations, or “no turnaround” signs installed near ESA’s. Furthermore, biological resources were put at risk, which not only violated project MMs, but also violated the conditions of SCE’s 1602 permit. Therefore, the seriousness of the incident was documented, and all project personnel were reminded of their responsibilities and the repercussions and potential fines for non-compliance issues.
NCR-4	On September 27, 2018, the CPUC issued NCR-4 for the Level 2 Incident that occurred on 9/19/2018 (see description of above)	MM BIO-1	The CPUC agreed with SCE’s immediate response, however, additional measures were taken. Specifically, SCE ensured that all future work related to the SBCRP (e.g., tower wreck-out or application of Natina) were completed under the supervision of a biological monitor.

3.3.3 Safety Incidents

SCE was required to report on health and safety incidents in accordance with the CPUC’s Safety Citation Program and Accident Reporting Requirements. Additionally, unanticipated events that had the potential to impact project personnel and/or public safety required reporting to the CPUC. While these events may not result in a deviation from or violation of a mitigation measure or permit condition, it was critical to inform the appropriate agencies and the CPUC so they could address any questions or concerns from the public or management. Therefore, the SCE EPM was required to promptly report these incidents to WSP, CPUC Project Managers, and applicable regulatory agencies and provide electronic notifications detailing the event, actions, and outcomes. One unanticipated non-project safety incident was reported for the SBCRP.

On December 4, 2017, the Thomas Fire began in Ventura County. Over the following weeks, the fire rapidly spread through Segments 1, 2, 3B, and 4, and a small portion of Segment 3A of the project site. Throughout December and January 2018, heavy rain and mudslides repeatedly forced closures of some project areas and consequently some project activities were temporarily put on hold for safety and

access reasons. Project construction resumed in February 2018 and easily progressed until November 2018, when the Woolsey Fire in Los Angeles and Ventura Counties and Hill Fire in Ventura Counties caused grid instability that delayed the project's last scheduled electrical outage. There were zero reported injuries from the non-project related fire incidents and the associated SBCRP construction activities.

3.3.4 Public/Stakeholder Complaints

Per the MMCRP, SCE was required to provide weekly summaries of public complaints, including how each complaint was addressed. Thus, SCE assigned a Local Public Affairs Manager responsible for tracking and handling public complaints. Public complaints could also be formally submitted to SCE and CPUC through email or the Project Information Line. If a complaint was received, the CPUC Compliance Manager or Project Manager coordinated with SCE's Environmental Project Manager, who worked with SCE's Local Public Affairs Manager to determine the adequacy of corrective actions or additional measures to be implemented, as necessary.

Throughout construction, stakeholders or members of the public complained about the project or specific aspects of construction activities. The applicant followed up with and resolved all complaints. A list of the complaints and resolutions is provided in Table 7.

Table 7. Public/Stakeholder Complaints

Landowner(s)/ Entity	Initial Concern	Proposed Action	Action Taken	Status
Burwell	Aesthetics	LPA met with landowner	Coordination between County Supervisor, SCE, and landowner	Closed
Copus	Aesthetics	Natina for poles near Gobernador Canyon	Painted poles with Natina	Closed
Dibble	Tower heights	LPA met with landowner, submitted letter addressing their concerns	Access road repair near CT-66 and 67 in Segment 3B (5/24/18)	Closed
Dyer	Road damage, Tower heights	LPA met with landowner	Access road repair near CT-66 and 67 in Segment 3B (5/24/18)	Closed
Fogliadini	Aesthetics	Natina for poles near Gobernador Canyon	Painted poles with Natina	Closed
Haley	Road damage	Fix road damage	McCarthy drain installation within = Civil ID 56-77 in Segment 3B (8/23/18)	Closed
Kerstetter	CDP compliance	Santa Barbara Coastal Program stop work	Lowered structures and painted (in NTPs and CDP)	Closed
Meyr	Aesthetics	Natina for poles near Chismahoo Road	Painted poles with Natina	Closed
Nichols	Access through property	Modify access to CT-105	Modified access to CT-105 in Segment 4 to use route post fire (non-project)	Closed
Nichols	Aesthetics	Natina for CT-103,104, and 105	Painted CT-103,104, and 105 in Segment 4 with Natina	Closed
Siple	CT-68 location	Shifting location	Shifted location of CT-68 (NTP) in Segment 3B	Closed
Stoecker	Aesthetics	Proposing six structures get Natina	Painted structures with Natina	Closed
Van Der Kar	Fruit trees, soil pathogens, CT-90 wall	Compensate for trees, tested for pathogen, CT-99 wall resolution	Tested, no pathogens found. Installed temporary gate and fence at CT-99 in Segment 4	Closed

Table 7. Public/Stakeholder Complaints

Landowner(s)/ Entity	Initial Concern	Proposed Action	Action Taken	Status
Vedder	Impacts to property	Vedder Agreement	“Remove abandoned facilities (MPR B on 4/12/18 and Exemption on 3/19/18), Natina structures (no permitting needed), restore fire road near CT-107 (non-project), Water line avoidance (4/10/18)”	Closed

Key:
 CDP = Coastal Development Permit
 CT = Construct
 LPA = Local Public Affairs

3.3.5 Final Inspection

In support of a final inspection for the SBCRP, the CPUC compliance team verified via photographic documentation that construction was cleared from the disturbance work areas except for that which was still in use for restoration activities. A series of photographs taken after road repairs to document the restoration of pre-project pavement conditions are included in Attachment A.

3.4 Post-Construction Compliance

Several mitigation measures and permit conditions required activities be performed at the completion of construction. These activities are described below.

Aesthetics

- **MM AE-3 Reduce Aesthetic Impacts of Retaining Walls and Access Road Improvements.** The purpose of MM AE-3 is to reduce aesthetic impacts by requiring application of techniques that minimize contrast with colors, forms, and textures within the surrounding landscape setting, in particular, retaining walls, other mechanically stabilized embankments (MSEs), and access road improvements that are visible from residences, public use or recreation areas, or publicly accessible state and county roads. The SBCRP adhered to MM AE-3 and the CPUC verified the minimization of contrast. Additionally, SCE and their contractor performed a Natina treatment application to several poles and structures at the request of landowners.

Biological Resources

- **MM BIO-3 Noxious and Invasive Weed Control Plan.** The purpose of the NIWCP is to implement measures designed to avoid the introduction and spread of noxious weeds and invasive plant species (designated by the state, the counties, or local weed control boards) after construction and during restoration of the SBCRP. Post-construction and restoration activities included stabilization and weed abatement. The previously vegetated areas were recontoured to pre-construction contours and/or stabilized to minimum erosion and sedimentation. Additionally, noxious weeds were removed from work areas during site preparation and preventative measures to control and prevent the spread of noxious weeds within temporarily disturbed areas. Furthermore, post-construction monitoring was performed from one to five years. Monitoring activities consisted of weed abatement, hydroseeding, and broadcast seeding application and site inspections by a qualified restoration biologist.

- **MM BIO-4 Limit Removal of Native Plants, Trees, and Natural Communities.** All disturbance to special status plants, county-protected trees, and special status natural communities were restored or mitigated in accordance with the HRMP. Additionally post-construction monitoring was performed from one to five years, depending on the disturbance level, restoration level, and success criteria.
- **MM BIO-5 Habitat Restoration and Mitigation Plan.** The purpose of the HRMP is to restore and revegetate temporarily impacted and disturbed areas to pre-construction conditions or better and provide for habitat restoration resulting from permanent impacts to sensitive vegetation communities. The HRMP specified that temporarily disturbed areas would be re-established to a vegetative cover typically equivalent to a minimum of 70 percent coverage of the pre-construction vegetative cover and/or pursuant to SWPPP requirements. Additionally, per the Conditions 2.26 and 2.27 of the CDFW Section 1600 Streambed Alteration Agreement (SAA), a total of 0.4 acre of streambed were impacted during construction and all sites within streambeds subject to authorized, temporary impacts were restored to pre-project alignments, elevation contours, and conditions to the maximum extent practicable. Furthermore, the onsite restoration of areas of temporary impacts to streambeds was performed in accordance with Chapter 5: Onsite Revegetation of the SBCRP Final Hydrologic Features Mitigation and Monitoring Plan. All hydroseeded areas were completed using native seed mix, consistent with assemblage of native plant species for the associated habitat area. In addition to hydroseed, biodegradable fiber rolls were installed, where necessary, as post-construction erosion control BMPs in the areas of temporary disturbance.

Post-construction restoration activities included stabilization and weed abatement, revegetation, restoration maintenance, and monitoring. Monitoring was performed from one to five years, depending on the disturbance level, restoration level, and success criteria. Monitoring activities consisted of weed abatement, hydroseeding, and broadcast seeding, and quarterly site visits by a qualified restoration biologist. The restoration biologists collected data including native and nonnative cover, species list, evidence of erosion, status of erosion, status of BMPs, observations of anthropogenic disturbance, occurrence of common and special-status wildlife, and any observed damage. If during monitoring, the restoration areas were found to be impacted, eroded, or otherwise not on track to meet the success criteria, the areas were flagged for maintenance (i.e., re-grading and/or additional rounds of hydroseeding). Data and photos were collected using tablets and uploaded in FRED. All restoration sites with the exception of areas that experienced ongoing site impacts from landowners were determined to have met the restoration requirements specified in the HRMP and HFMMP.

Restoration sites located within a jurisdictional drainage site were monitored for two years after initial revegetation efforts, in accordance with the HFMMP. Per Section 5.5 of the CDFW-approved HRMP, the restoration success was waived at Constructs 61 and 134 due to ongoing site impacts and despite SCE's reseeding efforts to affected areas as a remedial measure. Continued observations of landowner impacts to both sites indicated that the sites were unlikely to meet the minimum cover requirement with continued remedial efforts. Landowner impacts included weed whacking and vehicle damage (i.e., sites were run-over by landowner vehicles) that affected the restoration areas during the two-year monitoring period. Pre- and post-construction photographs of the impacted jurisdictional sites are provided in Attachment A.

- **MM BIO-10 Nesting Bird Management Plan.** In accordance with MM BIO-10 of the SBCRP MMCRP and MM 2.9 of the CDFW SAA, a NBMP was prepared to outline an adaptive management plan designed to avoid or reduce impacts to nesting bird species afforded protection under federal and state laws. Per Section 3.5 of the NBMP, an annual report providing a summary of the results of nest monitoring activities (including reported nest success and failures) was submitted to the CPUC, CDFW, and USFWS following construction. In summary, there was a total of 285 active nests recorded for the SBCRP, 182 (64%) were known or presumed to have fledged, 69 (24%) were known or presumed to have failed, and 34 (12%) nests not monitored past the incubation stage had unknown outcomes. No nests were determined to have failed due to project activities. Overall fledging success for the 251 active nests monitored to completion was 73%. The fledge success rate for raptor nests were 83% and 71% for non-raptor nests.

Of the 285 monitored active nests, 190 (67%) were located within the Thomas Fire burn perimeter, with 116 (61%) known or presumed to have fledged, 41 (22%) known or presumed to have failed and 33 (17%) nests not monitored past the incubation stage had unknown outcomes. The majority of the nests were built in areas where the fire burned with less intensity or patchy, such that vegetation remained to support nest structures and provide cover and foraging habitat. Few nests were found in areas where the fire burned with higher intensity and little to no vegetation remained (e.g., northwest corner of Segment 4).

The 157 (31 raptor and 126 non-raptor) active nests with known outcomes located within the Thomas Fire burn perimeter had an overall fledging success rate similar to all nests monitored to completion (74%), with 84% fledging success for raptors and 71% fledging success for non-raptors. In comparison, active nests with known outcomes located outside the Thomas Fire burn area were slightly less successful. These nests had an overall fledging success rate of 70%, with 80% fledging success for raptors and 69% fledging success for non-raptors. Factors that may have contributed to a higher nest success inside the burn perimeter may include: increased mosaic of habitat patches (e.g., benefit to species that typically nest in open areas but forage in unburned surrounding habitat), increased food resources (e.g., influx of bark- and wood-boring beetles and other insects), and decreased inter- and intraspecific competition (e.g., species/individuals move away from burned areas for nesting and foraging).

Cultural

- **MM CR-10 Cultural Resource Reporting.** The purpose of the CRMP was to facilitate the detection, documentation, protection, monitoring, and reporting of archaeological resources during construction activities, and to ensure implementation of the SBCRP APMs and MMs. Archaeological monitoring was conducted over approximately 30 days at several Constructs in Segment 3B and 4. One archaeological site was disturbed during emergency road repairs related to the Thomas Fire (i.e., non-project related). Furthermore, monitoring resulted in the identification of one prehistoric artifact located within recent fill soil. All applicable APMs and MMs were adhered to during and after the discovery. Accordingly, the SBCRP recorded the archaeological finding and a CDPR Form 523A was completed.

- **MM CR-11 Paleontological Monitoring and Treatment Plan.** The purpose of the PMTP was to ensure SBCRP compliance with approved paleontological mitigation measures by defining administrative and operational procedures, such as staffing responsibilities, construction monitoring methods, decision thresholds, required monitoring equipment, and fossil identification and recovery. A total of 166 days of paleontological monitoring was performed during ground disturbance activities on 79 transmission tower constructs on Segments 2, 3A, 3B, and 4. In accordance with MM CR-14, ground-disturbing work was halted or diverted away from the discoveries until a CPUC-approved paleontological monitor inspected the site.

Two Mako Shark (*Isurus sp.*) teeth from the early Miocene were found. The specimens were collected and taken to a designated vertebrate repository. Additionally, the specimens were documented at the time of discovery in SCE's FRED. Furthermore, invertebrate specimens from the Phylum Mollusca, orders Pelecypoda, Gastropoda, and Ostreoida were also encountered during grading operations. The Supervising Paleontologist determined these specimens to be common in the geologic formations and not significant, therefore they were not collected. Stratigraphic sections were not constructed as all localities occurred in excavation spoils, not in situ. No paleontological resources were discovered during construction that could not be avoided.




Transportation

- **MM TT-4 Repair of Damaged Trails.** The purpose of MM TT-4 is to restore and repair trails to pre-project conditions. Pre-project photos were uploaded in FRED. Post-construction photographs were taken to document the restoration of pre-project pavement conditions. Photographs documenting restoration were submitted to the CPUC. A series of trail and restoration site photographs are included in Attachment A.

APPENDIX

A Post-construction Restoration

**MM BIO-5 Habitat Restoration and Mitigation
MM TT-6 Repair of Damaged Trails
Streambed Alteration Agreement**

Description	Photo
<p>Segment 3B R05 (ID 116). Primarily bare ground and dead brush on top during pre-construction, ID 109. Photo taken on October 22, 2018, facing west.</p>	
<p>Segment 3B R05 (ID116). 70% cover. Photo taken on June 2, 2021, facing northwest.</p>	<p>Altitude: 103m (+9.1m) Datum: WGS-84 Azimuth/Bearing: 307° N53W 54.58mils True (+14°) Elevation Angle: -14.6° Horizon Angle: +00.2° Zoom: 1.0X</p> 
<p>Segment 3 R14 (ID 114). Partially burned during Thomas Fire in December 2017. Primarily weeds during pre-construction surveys. Photo taken on October 22, 2018, facing south.</p>	

Segment 4 R14 (ID 114). Regrowth is at 70% cover.
Photo taken on June 2, 2021, facing south.



Segment 4 R15 (ID 104). Previously burned during Thomas Fire in December 2017. Primarily weeds during pre-construction surveys.
Photo taken on October 22, 2018, facing southeast.



Segment 4 R15 (ID 104). Regrowth is at 70% cover.
Photo taken on June 2, 2021, facing southeast.



Segment 4 R17 (ID 109). Top of slope with primarily bare ground and dead brush on top during pre-construction surveys.
Photo taken on October 22, 2018, facing west.



Segment 4 R17 (ID 109). Top of slope with 10% absolute cover of regrowth. Additional restoration maintenance was performed at this location in accordance with the HRMP.

Photo taken on June 2, 2021, facing west.



Segment 4 R18 (ID 103). During pre-construction surveys.

Photo taken on October 22, 2018, facing south.



Segment 4 R17 (ID 103). Regrowth at ID 103.

Photo taken on June 22, 2021, facing west.



Feature ID: Construct 135. Pre-construction view of work area at Construct 135.

Photo taken on February 12, 2018, facing southeast.



Feature ID: Construct 135. Post-construction view of work area at Construct 135. No project impacts to jurisdictional waters.
Photo taken on February 13, 2019, facing south.



Feature ID: Construct 134. Pre-construction view of work area at Construct 134.
Photo taken on January 25, 2018, facing south.



Feature ID: Construct 134. Post-construction view of work area at Pole Construct 134.
Photo taken on December 13, 2018, facing south.



Feature ID: Civil ID 116. Pre-construction view of work area at Civil ID 116.
Photo taken on May 2, 2018, facing north.



Feature ID: Civil ID 116. Post-construction view of work area at Civil ID 116.
Photo taken on April 8, 2019, facing north.



Feature ID: Construct 129 and 130. Non-project fire restoration work.
Photo taken on February 28, 2019, facing south.



Feature ID: Construct 129 and 130. Post-construction view of non-project fire restoration work. No project impacts to jurisdictional waters. Photo taken on February 28, 2019, facing northwest.



Feature ID: Civil ID 109. Pre-construction view of work area at Civil ID 109. Photo taken on December 12, 2018, facing southwest.



Feature ID: Civil ID 109. Post-construction view of work area at Civil ID 109. Photo taken on December 12, 2019, facing southwest.



Feature ID: Civil ID 103. Pre-construction view of work area at Civil ID 103.
Photo taken on October 15, 2018, facing northwest.



Feature ID: Civil ID 103. Post-construction view of work area at Civil ID 103.
Photo taken on July 23, 2019, facing northwest.



Feature ID: Civil ID 97. Pre-construction view of work area at Civil ID 97.
Photo taken on March 19, 2018, facing northwest.



Feature ID: Civil ID 97. Post-construction view of work area at Civil ID 97. No project impacts to jurisdictional waters.
Photo taken on December 5, 2018, facing northwest.



Feature ID: Civil ID 89. Pre-construction view of work area at Civil ID 89.
Photo taken on March 19, 2018, facing northeast.



Feature ID: Civil ID 89. Post-construction view of work area at Civil ID 89. No project impacts to jurisdictional waters.
Photo taken on October 5, 2018, facing east.



Feature ID: Civil ID 27. Pre-construction view of work area at Civil ID 27.
Photo taken on July 30, 2018, facing west.



Feature ID: Civil ID 27. Post-construction view of work area and hydroseeding at Civil ID 27.
Photo taken on January 8, 2019, facing northwest.



Feature ID: Civil ID 30. Pre-construction view of work area at Civil ID 30.
Photo taken on August 16, 2018, facing west.



Feature ID: Civil ID 30. Post-construction view of work area and hydroseeding at Civil ID 30.
Photo taken on January 8, 2019, facing west.



Feature ID: Highway 150 Material Yard. Pre-construction view of work area at the Highway 150 Material Yard.
Photo taken on October 17, 2017, facing east.



Feature ID: Highway 150 Material Yard. Post-construction view of work area at the Highway 150 Material Yard. No project impacts to jurisdictional waters
Photo taken on December 6, 2018, facing east.



Feature ID: Civil ID 69. Pre-construction view of work area at Civil ID 69.
Photo taken on February 13, 2018, facing west.



Feature ID: Civil ID 69. Post-construction view of work area at Civil ID 69.
Photo taken on June 27, 2018, facing south.



Feature ID: Civil ID 67. Pre-construction view of work area at Civil ID 67.
Photo taken on June 26, 2018, facing west.



Feature ID: Civil ID 67. Post-construction view of work area and hydroseeding at Civil ID 67.
Photo taken on December 11, 2018, facing west.



Feature ID: Civil ID 65 and 66. Pre-construction view of work area at Civil ID 65 and 66.
Photo taken on February 13, 2018, facing northeast.



Feature ID: Civil ID 65 and 66. Post-construction view of work area and hydroseeding at Civil ID 65 and 66.
Photo taken on December 11, 2018, facing northeast.



Feature ID: Construct M5-T2 (east of Construct 60).
Pre-construction view of work area at Construct M5-T2.

Photo taken on June 26, 2018, facing east.



Feature ID: Construct M5-T2 (east of Construct 60).
Post-construction view of work area at Construct M5-T2.

Photo taken on April 9, 2019, facing east.



Feature ID: Construct 61. Pre-construction view of
work area at Construct 61.

Photo taken on October 4, 2017, facing east.



Feature ID: Construct 61. Post-construction view of work area at Construct 61.
Photo taken on May 10, 2019, facing east.



Feature ID: Civil ID 185. Pre-construction view of work area at Civil ID 185.
Photo taken on February 13, 2018, facing southwest.



Feature ID: Civil ID 185. Post-construction view of work area at Civil ID 185. No project impacts to jurisdictional waters.
Photo taken on March 29, 2019, facing southwest



Feature ID: Construct M7-T6 (west of Construct 69).
Pre-construction view of work area at Construct M7-T6.

Photo taken on December 1, 2017, facing west.



Feature ID: Construct M7-T6 (west of Construct 69).
Post-construction view of work area at Construct M7-T6. No project impacts to jurisdictional waters.

Photo taken on October 26, 2019, facing west.



Feature ID: Harmon Canyon Road. Pre-construction view of work area at Harmon Canyon Road.
Construction activity at the site ended on October 12, 2017, and no project impacts to jurisdictional waters occurred.

Photo taken on October 12, 2017, facing west.



Feature ID: Harmon Canyon Road. Post-construction view of work area at Harmon Canyon Road. No project impacts to jurisdictional waters occurred. Photo taken on October 12, 2017, facing west.



Feature ID: Harmon Canyon Road. Post-construction view of work area and post-burn at Harmon Canyon Road. Photo taken on January 17, 2018, facing south.



Feature ID: Harmon Canyon Road. Pre-construction view of work area at Harmon Canyon Road. Photo taken on October 12, 2017, facing west.



Feature ID: Harmon Canyon Road. Post-construction view of work area and post-burn at Harmon Canyon Road.

Photo taken on January 17, 2018, facing north.



Feature ID: Harmon Canyon Road. Pre-construction view of work area at Harmon Canyon Road.

Photo taken on October 12, 2017, facing west.



Feature ID: Harmon Canyon Road. Post-construction view of work area and post-fire at Harmon Canyon Road.

Photo taken on January 17, 2018, facing north.



Feature ID: Harmon Canyon Road. Pre-construction view of work area at Harmon Canyon Road.
Photo taken on October 12, 2017, facing west.



Feature ID: Harmon Canyon Road. Post-construction view of work area and post-fire at Harmon Canyon Road.
Photo taken on January 17, 2018, facing north.



Feature ID: Harmon Canyon Road. Post-construction view of work area at Harmon Canyon Road. No project impacts to jurisdictional waters occurred at JD Site #FC11 on Harmon Canyon Road.
Construction activities at the site ended on October 17, 2017.
Photo taken on March 13, 2019, facing south.



Feature ID: Harmon Canyon Road. Post-construction view of work area and washed-out natural erosion from heavy spring rain events at Harmon Canyon Road. No project impacts to jurisdictional waters occurred at JD Site #FC12 on Harmon Canyon Road. Construction activities at the site ended on October 17, 2017.

Photo taken on March 13, 2019, facing south.



Feature ID: Harmon Canyon Road. Pre-construction view of work area at Harmon Canyon Road.

Photo taken on October 12, 2017, facing west.



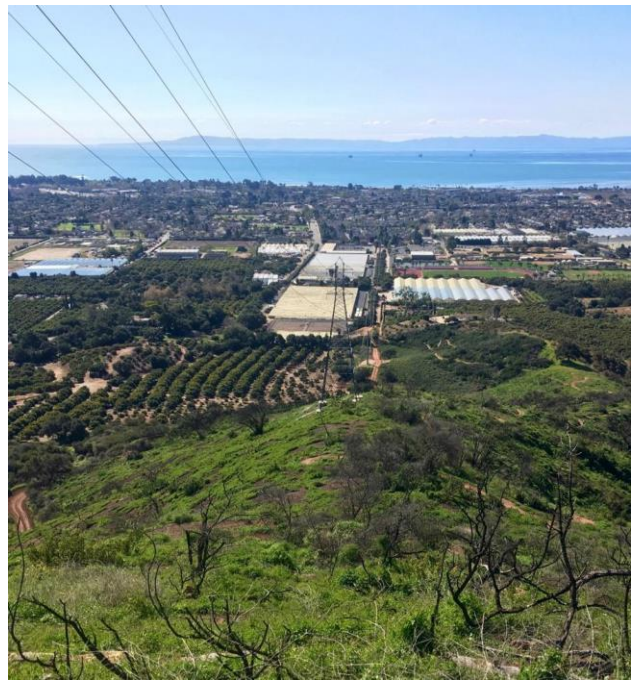
Feature ID: Harmon Canyon Road. Post-construction view of work area at Harmon Canyon Road.

Photo taken on March 13, 2019, facing west.



Segment 4. Revegetation evaluation of the temporarily disturbed area near the TSP on the Franklin Trail.

Photo taken on February 8, 2018, facing west.



Segment 3B, TSP 56. Restoration evaluation.
Photo taken on March 26, 2019, facing east.



Segment 4. Grazing activities impacted the BMPs and the restoration progress and performance.
Photo taken on March 26, 2019, facing south.



Segment 4 near TSP 78. Restoration progress.
Photo taken on March 26, 2019, facing west.



Segment 4 near TSP 80. Restoration progress. Non-project related erosion and grazing impacted restoration efforts at this tower location.
Photo taken on March 26, 2019, facing southwest.



Segment 4 near Franklin access road. Gabion wall installed along the Franklin access road.
Photo taken on March 26, 2019, facing southwest.



Segment 4 near TSP 128. Restoration progress near TSP 128.

Photo taken on April 17, 2019, facing south+.



Segment 4 near TSP 128. A McCarthy drain installed at TSP 128.

Photo taken on April 17, 2019, facing south.



Segment 4 along the Franklin Trail access road. A non-project related temporary bridge installed over Sutton Creek along the Franklin access road.

Photo taken on April 17, 2019.



Segment 4 near TSP 120. Erosion issues were addressed, and restoration completed on the access road at the tower pad.

Photo taken on April 17, 2019, facing southeast.



Segment 4 near TSP 112. The previously disturbance areas under the oak trees restored.
Photo taken on April 17, 2019, facing southwest.



Segment 4 near TSP 99. Installation of BMP upgrades as part of ongoing restoration maintenance activities.
Photo taken on August 21, 2019, facing north.



Segment 4 near TSP 98. Installation of BMP upgrades as part of ongoing restoration maintenance activities.
Photo taken on August 21, 2019, facing north.



Segment 4 along the Franklin Trail access road. McCarthy drain installation completed and restoration status.
Photo taken on August 21, 2019.



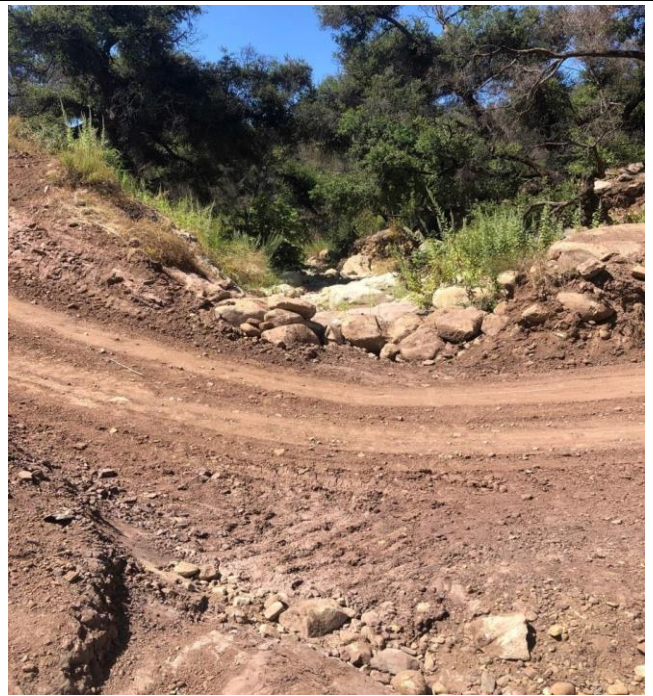
Segment 4 near TSPs 126 and 127. Slope between the two TSPs was restored.
Photo taken on August 21, 2019, facing west.



Segment 4 near TSP 128. McCarthy drain installation completed and restoration status.
Photo taken on August 21, 2019, facing south.



Segment 4 along the Franklin Trail access road.
Road crossing at Sutton Creek along the Franklin Trail access road.
Photo taken on August 21, 2019, facing northwest.



Segment 4 near TSP 120. Access road to TSP 120.
Photo taken on August 21, 2019, facing southeast.

