



ecology and environment, inc.

Global Environmental Specialists

501 West Broadway, Suite 800

San Diego, California 92101

Tel: (619) 696-0578, Fax: (888) 645-4354

February 9, 2018

Jensen Uchida
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Monthly Report Summary #3 for the Santa Barbara County Reliability Project

Dear Mr. Uchida,

This report provides a summary of the compliance monitoring activities that occurred during the period from **December 1 to 31, 2017**, for the Santa Barbara County Reliability Project (SBCRP) in Ventura County and Santa Barbara County, California. Compliance monitoring was performed to ensure that all project-related activities conducted by Southern California Edison (SCE) and its contractors are in compliance with the requirements of the Final Environmental Impact Report (Final EIR) for the SBCRP, as adopted by the California Public Utilities Commission (CPUC) on November 5, 2015.

The CPUC has issued the following Notices to Proceed (NTPs) for the project to SCE:

- NTP #1 (October 21, 2016): Establishment and operation of staging yards in Ventura County.
- NTP #2 (May 23, 2017): Construction of subtransmission, substation, and telecommunication related components in Ventura County.
- NTP #3 (May 23, 2017): Construction of subtransmission, substation, and telecommunication related components in Ventura County and Santa Barbara County, and staging yards in Santa Barbara County.

Onsite compliance monitoring by the Ecology and Environment, Inc. (E & E) compliance team during this reporting period focused on spot-checks of ongoing construction activities. Compliance Monitor Vince Semonsen visited the SBCRP construction sites on December 21, 2017. Site inspection reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and applicant proposed measures (APMs) were completed for the site visit. The reports are attached below (Attachment 1).

Overall, the SBCRP has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program's (MMCRP) Compliance Plan. Communication between the CPUC/E & E compliance team and SCE has been regular and effective; the correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between CPUC/E & E and SCE, along with daily schedule updates and database notifications, provided additional compliance information and construction summaries. Furthermore, SCE's monthly compliance status report for December 2017 provided a compliance summary and included: a description of construction activities from December 1 to 31, 2017; a detailed look-ahead construction schedule; a summary of compliance with project commitments (MMs/APMs) for biological, cultural, and paleontological resources, the Storm Water Pollution Prevention Plan (SWPPP), noise, and

the Worker Environmental Awareness Program (WEAP); environmental preparation for future work phases; and a list of recent SBCRP approvals and outstanding agency deliverables.

Compliance Incidents

During the December 2017 reporting period, several compliance incidents occurred. Compliance incidents include:

- December 2, 2017: A biologist observed a SBCRP vehicle onsite with no air quality sticker. This vehicle was unwashed with visible weeds attached. Russian thistle was observed in the vehicles grill and heavy mud was on the side of the truck. The incident was on Segment 3B near Construct 60, adjacent to California red-legged frog habitat, Las Sauces Creek, and a population of Plummer's baccharis, and within disturbance limits. This incident conflicts with MM BIO-3, the Noxious and Invasive Weed Control Plan, which requires vehicles to be soil and debris free before using access roads. The owner of the vehicle was notified and the vehicle was removed from site.
- December 2, 2017: A biologist observed two subcontractor personnel onsite that had not received WEAP training. The incident was on Segment 3B near Construct 60, near California red-legged frog habitat, Las Sauces Creek, and a population of Plummer's baccharis, and within disturbance limits. This incident conflicts with APM GEN-1, which requires WEAP training for all personnel prior to them working onsite. The personnel received WEAP training the same day.
- December 2, 2017: A biologist observed an Henkels & McCoy (H&M) crew driving a flatbed truck down an unapproved access road near Construct M6-T8. The crew drove approximately 1,000 feet down the unapproved road before the biologist flagged the crew down to direct them to the approved road. The incident was on Segment 3B west of Construct M6-T8 and was not in an environmentally sensitive area. This incident conflicts with MM BIO-1, which requires all vehicles to be restricted to approved areas.
- December 4, 2017: A biologist observed an irrigation pipe that had been damaged by a drill rig. The pipe was releasing water on and adjacent to the access road and partially outside of disturbance limits. The water was shut off in order to replace the pipe; however, the discharge had run offsite approximately 200 feet onto private property and caused erosion downslope. No sensitive resources were impacted. The incident was on Segment 3B near Construct 67. This incident conflicts with APM BIO-7, which requires the SBCRP to obtain and implement a SWPPP.

Additionally, two minor spills/leaks were self-reported by SCE. These incidents were dealt with in a timely manner.

Other Incidents

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 SBCRP. While the fire was not project related, it did impact a large portion of the SBCRP. Some SBCRP activities were put on hold for safety and access reasons. SCE has begun preconstruction surveys post fire, and Environmentally Sensitive Areas (ESAs) were re-staked. SCE has also begun assessment of sensitive species suitable habitat for California red-legged frog, least Bell's vireo, southwestern willow flycatcher, San Diego desert woodrat, and California condor, and has been updating oak tree data. Emergency crews were working to restore or maintain electrical service to the SBCRP area.

Minor Approvals

During December 2017, no minor or email approvals were issued.

Sincerely,

A handwritten signature in black ink, appearing to read "Jenny Vick". The signature is fluid and cursive, with a prominent loop at the end.

Jenny Vick
Project Manager, Ecology and Environment, Inc.

cc:
Kenneth Spear, SCE
Marcus Obregon, SCE

ATTACHMENT 1

CPUC Site Inspection Report
December 21, 2017



Santa Barbara County Reliability Project CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	Date:	December 21, 2017
Project Proponent:	Southern California Edison	Report #:	VS009
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Jensen Uchida, Energy Division	AM/PM Weather:	Sunny with mild temperatures and a slight breeze
E & E CM:	Jenny Vick	Start/End Time:	0700 to 1030
Project NTP(s):	NTP-1, NTP-2, NTP-3		

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

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

Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	X		
Are excavations and trenches covered at the end of the day?	X		
Are wildlife escape ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?			X
Biology	Yes	No	N/A
Have preconstruction surveys been completed for biological (wildlife, nesting birds, coastal California gnatcatcher, least Bell's vireo) resources, as appropriate?	X		
Are biological monitors present onsite?	X		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	X		
Have wildlife been relocated from work areas? If yes, describe below.		X	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)? If yes, describe below.		X	
Did you observe any threatened or endangered species? If yes, describe below.		X	
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features?	X		
Have there been any work stoppages for biological resources? If yes, describe below.	X		
Cultural and Paleontological Resources	Yes	No	N/A
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			X
Are archaeological and paleontological monitors onsite, if needed?	X		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			X
Have there been any work stoppages for cultural/paleo resources? If yes, describe below.		X	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used on site properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		
Are required fire prevention and control measures in place?	X		
Are contaminated soils properly managed for onsite storage or offsite disposal?	X		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?			X
Is construction occurring within approved hours?	X		
Are required noise control measures in place?	X		

AREAS MONITORED (i.e., structure numbers, yards, or substations)

Segment 3B and the Carpinteria Substation

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)

At 1030, I met with lead biological monitor Matt Schaap (BRC) at the Highway 150 Yard. Work was gradually picking up after the Thomas Fire, but only a few crews were onsite on the day of my site inspection. The crews were planning to shut down for the holiday on December 23, 2017, and resume work after the new year. The fire did not burn the Highway 150 Yard or reach some areas east of the yard.

At the Carpinteria Substation, a number of new tubular steel pole (TSP) foundations had been poured along with some additional concrete pads (Photos 1 and 2). At the time of my site inspection, a new TSP foundation was being poured just outside of the Carpinteria Substation fence; precautions had been taken to prevent any concrete spillage (Photo 3). This tower is a part of Segment 4, which is a portion of the SBCRP that had been burned (Photo 4).

When I first arrived at the Carpinteria Substation, I noticed some fresh concrete had spilled onto the public roadway by a concrete truck turning onto the Segment 4 access road. I notified Matt Schaap and he spoke with the onsite crew. The crew immediately removed the spilled concrete from the road (Photo 5).

From the access road to Segment 3B, I could see how much of the SBCRP site and surrounding area had been burned during the fire (Photo 6). Matt Schaap and I stopped on Rincon Mountain at Construct 68 where a crew was removing the foundation forms and conducting final concrete preparation (Photo 7). I noted that the fire had burned right up to the tower foundation, and areas along the access road were also burned (Photo 8).

I drove east to Construct 64 where a large crew was installing the welded wire walls needed (APM GEO-1) for the drilling rig and the crane pad (Photo 9). The crew had been working long hours at this site and utilizing solar powered lights; they were aiming to finish this site before the holiday break. Matt Schaap spoke with biological monitor Yuling Huo (Rincon) (APM BIO-3) (Photo 10). Paleontological monitor Andrew Paden (GANDA) was also at this site (MM CR-13).

I spoke to the onsite fireman (Shawn) who said he had been stationed at the Teen Challenge Yard during the fire to protect the trailers and equipment. The fire burned around the Teen Challenge Yard, but did not reach inside the fence.

Shawn said that the high winds from the night before were problematic, and the ash created a situation similar to a "white out" (MM HZ-2). Most of the crew members were wearing or had access to masks.

Matt Schaap and I discussed best management practices (BMPs) throughout the SBCRP site and the challenges of dealing with all of the burned areas (APM BIO-7).

MITIGATION MEASURES VERIFIED (Refer to MMCRP, e.g., MM BIO-5. Report only on MMs pertinent to your observations today)

See the mitigation measures (MMs) listed in the observed activities descriptions.

All construction personnel appear to have gone through the Worker Environmental Awareness Program (WEAP) training (APM GEN-1).

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

Due to the onset of the rainy season and the burned areas throughout the SBCRP, BMP installation and maintenance is very important (APM BIO-7).

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)

COMPLIANCE SUMMARY
 Below please describe any non-compliance issues or new biological/cultural discoveries (compliance level 0) that have occurred since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to E & E Compliance Manager. Inform E & E CM of any non-compliance incidents.

New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.

Non-Compliance Level 1: An action that deviates from project requirements or results in the partial implementation of the mitigation measures, but has not caused, or has the potential to cause impacts on environmental resources. If you checked this box, describe the incident below and follow-up to ensure correction.




Non-Compliance Level 2: An action that deviates from project requirements or mitigation measures that has caused, or has the potential to cause minor impacts on environmental resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.

Non-Compliance Level 3: An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the APMs, mitigation measures, permit conditions, approval requirements (e.g. minor project changes, notice to proceed), and/or violates local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird nests, and grading of unapproved vegetated areas. A non-compliance Level 3 may also be issued if Level 2 incidents are repeated. If you checked this box, please fill out a Non-Compliance Report.



Non-compliance issues reported by SCE: Were there any new non-compliance issues reported by SCE monitors since your last visit? If so, describe issues and resolution and include SCE report identification number.

Date	Non-compliance Issue and Resolution	Relevant Mitigation Measure	NC Report #




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



REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
12/21/17	Carpinteria Substation		Photo 1 – A number of new TSP foundations are in place within the Carpinteria Substation. Photo facing east
12/21/17	Carpinteria Substation		Photo 2 – Concrete pads have been poured within the Carpinteria Substation.
12/21/17	Segment 4		Photo 3 – A crew is pouring a new TSP foundation.

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
12/21/17	Segment 4		<p>Photo 4 – Much of Segment 4 was burned in the Thomas Fire. Photo taken from the Carpinteria Substation facing north.</p>
12/21/17	Roadway Outside of the Carpinteria Substation		<p>Photo 5 – A crew is removing a concrete spill from the public roadway.</p>

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
12/21/17	Segment 3B Access Road		Photo 6 – Looking north toward the Highway 150 Yard.
12/21/17	Segment 3B – Construct 68		Photo 7 – Crews are cleaning up foundation work; note the burned area near the TSP. Photo facing northwest.
12/21/17	Segment 3B – Access Road		Photo 8 – Extensive fire damage. Photo facing southwest toward Rincon Mountain.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
12/21/17	Segment 3B – Construct 64		Photo 9 – A crew is working on the welded wire walls at Construct 64. Photo facing east
12/21/17	Segment 3B – Construct 64		Photo 10 – Matt Schaap is speaking with onsite biological monitor Yuling Huo.