

March 6, 2019

Connie Chen
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Monthly Report Summary #16 for the Santa Barbara County Reliability Project

Dear Ms. Chen,

This report provides a summary of the compliance monitoring activities that occurred during the period from **February 1 through 28, 2019**, 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 SBCRP 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 **February 8 and 26, 2019**. Site inspection reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and applicant proposed measures (APMs) were completed for each site visit. A report is attached below (Attachment 1).

Several compliance concerns occurred during the period from February 1 to 28, 2019, however, overall the SBCRP has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program's (MMCRP's) 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 February 2019 provided a compliance summary and included: a description of construction activities from February 1 to 28,

2018; 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 February 2019 reporting period, SCE self-reported three non-project related compliance observations and one. Project related compliance observation. The compliance observations are described below.

- On February 5, 2019, a biologist observed a landslide resulting from a recent storm event blocking a project access road. The incident was observed on Segment 4 and was not in any listed species habitat. The area affected was surveyed and partly outside approved disturbance limits. The landslide originated from the slope west of the access road and was approximately 10 feet wide by 40 feet long. The incident was not project related. The incident conflicts with **APM BIO-7: Stormwater Pollution Prevention Plan (SWPPP)**.
- On February 5, 2019, a biologist observed that the access road to Construct 125 was washed out as a result of a recent storm. The access road at the Sutton Canyon Creek crossing was washed out approximately 5 feet across and 4 feet deep. This crossing had been improved as part of the Thomas Fire response and restoration work and was not project related. The incident was observed on Segment 4 and was in steelhead critical habitat and a California red-legged frog habitat area. The area affected was surveyed and was completely inside approved disturbance limits. The incident was not project related. This incident conflicts with **CDFW 1602 AMM 2.15 - 2.24: Avoid impacts to waters**.
- On February 26, 2019, a biologist observed spilled concrete on the ground. The incident was observed on Segment 3B and was not in any listed species habitat. The area affected was surveyed and was completely inside approved disturbance limits. The spilled concrete covered an area of approximately one square foot. The concrete and affected soils were cleaned up on 02/27/2019. The incident conflicts with **APM BIO-7: Stormwater Pollution Prevention Plan (SWPPP)**.
- On February 26, 2019, a biologist observed a non-project Henkels and McCoy (H&M) civil crew grading an access road near Franklin Creek as part of the post-Thomas Fire restoration work. The incident was observed on Segment 4 and was not in any listed species habitat. The creek passes under the road via culvert at this location. The area affected was surveyed and partly outside approved disturbance limits. The affected area outside the approved disturbance limits was approximately 80 square feet in size. No water was present in the creek and no sensitive resources were affected. Environmental Sensitive Area (ESA) signs were present and installed correctly. The incident is not project related. The incident conflicts with **MM-BIO 1: Clearly mark project boundaries and sensitive areas**.

During the February 2019 reporting period, the CPUC Compliance Monitor reported the following compliance concerns:

- On February 26, 2019, the CPUC Compliance Monitor inspected the work at TSP 112 and noted a small parking pad graded under the dripline of several oak trees adjacent to the TSP 112 access road and tower pad. The CPUC Compliance Monitor noted several oak tree roots damaged and left exposed following the grading. Restoration and hydroseeding were recommended.
- On February 26, 2019, the CPUC Compliance Monitor noted several installed best management practices (BMPs) near tubular steel poles (TSPs) 18 and 20 needing upgrades since most appeared washed out or nearly washed out.

During the February 2019 reporting period, the CPUC did not issue a Non-Compliance.

Public Concerns

There were no public concerns during February 2019.

Minor Approvals

During February 2019, no email or minor approvals were issued.

Sincerely,



Fernando Guzman
Project Manager, Ecology and Environment, Inc.

cc:

Kenneth Spear, SCE
Marcus Obregon, SCE

ATTACHMENT 1

CPUC Site Inspection Report
February 8 and 26, 2019



Santa Barbara County Reliability Project CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	Date:	February 8, 2019
Project Proponent:	Southern California Edison	Report #:	VS037
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Connie Chen, Energy Division	AM/PM Weather:	Sunny with cool temperatures and a slight breeze
E & E CM:	Fernando Guzman	Start/End Time:	1000 to 1230
Project NTP(s):	NTP-1, NTP-2, NTP-3, NBMP, NIWCP		

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)

Segments 3B and 4

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

I arrived onsite and met with lead environmental biologist Matt Schaap at 1000 near the Carpinteria Substation. The conditions were wet during the last couple of weeks, and the area was beginning to dry out. This was my first site visit since December 14, 2018; at that time, I only looked at revegetation sites along Segments 1 and 2.

Matt Schaap and I drove to Segment 4 and TSP 99 where a crew was conducting construction work activities at the Hilfiker wall located below the tower – Photo 2. Rock and other best management practices (BMPs) were installed and/or being installed along the access road – Photos 1 & 3. The crew expected to be done with this task in one to two days.

We drove toward the Franklin Trail access road since work was occurring in the foothills. The access road had been regraded multiple times and several McCarthy drains were installed; according to Matt Schaap, this work was being completed under the “Fire Restoration” category or “Non-Project Related” work.

Photo 4 is the view looking down toward the power lines near the Carpinteria Substation and TSP 132. A Henkels and McCoy (H&M) foreman was preparing to operate a dozer along the access road to begin final restoration work – Photo 5.

Some of the BMPs needed upgrades – Photo 6. We met with biological monitor Mike Moss who was compiling a check list of areas needing BMP repairs.

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 appeared to have completed Worker Environmental Awareness Program (WEAP) training (APM GEN-1).

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

Check final restoration along a landowner property near TSP 120.

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
02/08/18	SBCRP – Segment 4 TSP 99		Photo 1 – BMPs and rock for the access road.
02/08/18	SBCRP – Segment 4 TSP 99		Photo 2 – Completing work at the Hilfiker wall. Photo facing southwest.
02/08/18	SBCRP – Segment 4, TSP 99		Photo 3 – Access road to the tower site.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
02/08/18	SBCRP – Segment 4		Photo 4 – Revegetation evaluation of disturbed area near the TSP on the Franklin Trail.
02/08/18	SBCRP – Segment 4, TSP 130		Photo 5 – Equipment onsite. Photo facing west.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
02/08/18	SBCRP – Segment 4, Carpinteria Substation		Photo 6 – BMPs needing upgrades.

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	02/21/19

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	02/22/19



Santa Barbara County Reliability Project CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	Date:	February 26, 2019
Project Proponent:	Southern California Edison	Report #:	VS038
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Connie Chen	AM/PM Weather:	Hazy sunshine with cool temperatures and a light breeze
E & E CM:	Fernando Guzman	Start/End Time:	1200 to 1430
Project NTP(s):	NTP-1, NTP-2, NTP-3, NBMP, NIWCP		

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 4

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

I arrived onsite and met with lead environmental biologist Mike Moss at 1200 near the Carpinteria Substation.

We drove part way up the Franklin Trail access road, where a two-person crew was installing a gate directly past TSP 133 – Photo 1. Mike Moss mentioned that other work was occurring along the Franklin Trail access road, which included road repair and installation of a McCarthy drain. According to Mike, this work was classified as “Fire Restoration” or “Non-Project Related.” He also mentioned that the road was completely washed out at the Sutton Creek crossing; therefore, access was cut off from several towers.

I wanted to inspect the work activities located in the landowner’s property; Mike Moss verified we had permission to drive on the property. A significant amount of work was completed on the access road. Several new water bars and McCarthy drains were installed.

Our first stop was at TSP 112, where I evaluated the revegetation. During construction, a small parking pad was graded under the dripline of several oak trees adjacent to the TSP 112 access road and tower pad. Several oak tree roots appeared damaged and had been left exposed following the grading. I commented on this location in previous reports in October 2018, recommending restoration and reseeding. At that time, I spoke to the environmental team, one of the Henkels and McCoy (H&M) foreman, and I also sent an email to Marcus Obregon from SCE. Unfortunately, the pad did not appear to be restored – Photo 2. However, Mike Moss mentioned crews delivered soil to cover the exposed oak roots.

We drove out from the access road to TSP 118; the road was blocked by a slide directly past TSP 118, therefore, we walked toward the end of the road near TSP 119. There were several locations along this access road where moving rocks was required in order to have access to drive through. A few of the best management practices (BMPs) installed around the towers needed upgrades, since they were washed out – Photo 3 – or nearly washed out – Photo 5. The gabion walls placed along the roadway at the small drainage crossings appeared to have held up well – Photo 4.

From TSP 119, we looked across the arroyo with binoculars at TSP 120. We noted that rainwater runoff had severely eroded the last, very steep section of the access road to the TSP.

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

All construction personnel appeared to have completed Worker Environmental Awareness Program (WEAP) training (APM GEN-1).

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

Restoration of the small parking pad at TSP 112.

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.
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- 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
02/26/18	SBCRP – Segment 4 TSP 133		Photo 1 – Gate installation along the Franklin Trail access road. Photo facing north.
02/26/18	SBCRP – Segment 4 TSP 112		Photo 2 – Graded parking pad needs restoration. Photo facing west.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
02/26/18	SBCRP – Landowner's property access road		Photo 3 – BMPs needing maintenance, located along the access road.
02/26/18	SBCRP – Vedder property access road		Photo 4 – Gabion walls held up well at the various drainage crossings.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
02/26/18	SBCRP – Segment 4		Photo 5 – Erosion along the access road. Photo facing east.

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	03/02/19

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	03/04/19