

January 18, 2020

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

Re: Monthly Report Summary #18 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 **April 1 through 30, 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 **April 17, 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 April 1 to 30, 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 April 2019 provided a compliance summary and included: a description of construction activities from April 1 to 30,

2019; 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 April 2019 reporting period, SCE self-reported two non-project related compliance observations. The compliance observations are described below.

- On April 6, 2019, a biologist observed a non-project McCarthy drain that had been installed by a non-project Henkels and McCoy (H&M) crew 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 area affected was completely outside approved disturbance limits. The incident was not project related. This incident conflicts with **MM BIO-1: Clearly mark project boundaries and sensitive areas.**
- On April 30, 2019, a biologist observed that vegetation had been freshly cut with a weed whacker at a restoration site. The incident was observed on Segment 3B and occurred partially within a least Bell's vireo survey area. Approximately 75% of the restoration area was affected. The area affected was partially outside approved disturbance limits. Environmental Sensitive Areas (ESAs) for Plummer's baccharis and Fish's milkwort are mapped within the affected area, but the area was previously graded, and no evidence of the plants was observed. The weed whacking occurred partly within the Las Sauces Creek riparian area. The weed whacking has resulted in moderate impacts to the hand-seeded area due to the newly established plants being cut/removed. The incident was not project related. This incident conflicts with **MM BIO-5: Prepare and implement a Habitat Restoration and Mitigation Plan; Purchase mitigation credits.**

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

- On April 17, 2019, the CPUC Compliance Monitor noted several damaged BMPs installed near the Carpinteria Substation staging area. The CPUC Compliance Monitor recommended upgrading and stabilizing these BMPs prior to rain events.
- On April 17, 2019, the CPUC Compliance Monitor noted that the bushtit nest located near tubular steel pole (TSP) 133 appeared predated. The CPUC Compliance Monitor recommended notifying the onsite avian biologist to inspect the nest.
- On April 17, 2019, the CPUC Compliance Monitor and an onsite project biologist encountered a gopher snake warming itself on the access road asphalt near TSP 112. The gopher snake was relocated away from the road so it would not get injured by traveling vehicles.

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

Public Concerns

There were no public concerns during April 2019.

Minor Approvals

During December 2018, no email or minor approvals were issued.

Sincerely,

A handwritten signature in black ink, appearing to read "Fernando Guzman". The signature is fluid and cursive, with the first name being more prominent.

Fernando Guzman
Project Manager, Ecology and Environment, Inc.

cc:

Kenneth Spear, SCE
Marcus Obregon, SCE

ATTACHMENT 1

CPUC Site Inspection Report

April 17, 2019



Santa Barbara County Reliability Project CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	Date:	April 17, 2019
Project Proponent:	Southern California Edison	Report #:	VS040
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Connie Chen, Energy Division	AM/PM Weather:	Partly cloudy and cool temperatures with a slight breeze
E & E CM:	Fernando Guzman	Start/End Time:	0930 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 & 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 0930 near the Carpinteria Substation. Some staging of materials continued under the power lines near the substation – Photo 1. Best management practices (BMPs) were installed in this area. They were in poor condition; however, no rain was expected for a while now.

We traveled toward the Franklin Trail access road, since it was open all the way out to tubular steel pole (TSP) 120. At TSP 133, we stopped directly outside of the buffer stakes to inspect the bushtit nest. No activity was observed around the nest, and it appeared a bit ragged, such that it may have been predated. Mike Moss notified his avian biologist, Nathan Marcy, about the status of the nest. Nathan Marcy mentioned that the nest was previously active, so they would check the nest later in the day.

BMP upgrades were completed around TSPs 127 and 128 – Photos 2 & 3. We discussed the adequacy of the BMPs. There was also a new McCarthy drain installed to collect the rainwater runoff from the TSP 128 pad – Photo 4.

A substantial amount of “Non-Project Related” work was completed along the road, including numerous sites that were regraded, McCarthy drain installations, and the bridgework at Sutton Creek – Photo 5. According to Mike Moss, the temporary bridge installed over Sutton Creek was to be soon be removed. The “Non-Project Related” work was overseen by the biological monitors but it was not subject to the conditions of the Santa Barbara County Reliability project (SBCRP) construction efforts. This work was being completed by the Henkels and McCoy (H&M) contractor.

Erosion repairs have been made at TSP 120, including cutting water bars, laying gravel the access road, and lining larger rock along the rilled area – Photo 6.

We drove onto the landowner property near TSP 112. The small parking area under the oak trees had been restored – Photo 7. Soil appeared to have been added to the cut bank and the site was hydroseeded. On the way down we encountered a gopher snake warming itself on the asphalt – we relocated it away from the road so it would not get run over by traveling vehicles – Photo 8.

Our last stop was at TSP 76 where a crew was installing a handrail along the tower access road – Photo 9.

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)

An explanation for determination of work being “Non-Project Related.”

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

New vegetative growth is proliferating in the burned areas, with crown sprouting trees and shrubs and substantial wildflowers.




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
04/17/19	SBCRP – Segment 4		Photo 1 – Staging area near the Carpinteria Substation. Photo facing north.
04/17/19	SBCRP – Segment 4		Photo 2 – BMP work at TSPs 126 & 127. Photo facing west.
04/17/19	SBCRP – Segment 4		Photo 3 – Looking south down towards the power lines from TSP 128. Photo facing south.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
04/17/19	SBCRP – Segment 4		Photo 4 – McCarthy drain installed at TSP 128. Photo facing south.
04/17/19	SBCRP – Segment 4		Photo 5 – Temporary bridge installed over Sutton Creek along the Franklin Trail access road.
04/17/19	SBCRP – TSP 120, Segment 4		Photo 6 – Erosion problems were fixed on the access road and at the tower pad. Photo facing southeast.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
04/17/19	SBCRP – TSP 112, Segment 4		Photo 7 – Restored parking spot under the oak trees. Photo facing southwest.
04/17/19	SBCRP – Segment 4		Photo 8 – Gopher snake on the road. The snake was properly relocated away from the road so it would not get injured from traveling vehicles.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
04/17/19	SBCRP – TSP 76		Photo 9 – Handrail installation along the tower access road. Photo facing east.

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	04/20/19

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	04/20/19