



## ecology and environment, inc.

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June 13, 2018

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

### **Re: Monthly Report Summary #8 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 **May 1 to 31, 2018**, 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 May 10 and 15, 2018. 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. The reports are attached below (Attachment 1).

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 May 2018 provided a compliance summary and included: a description of construction activities from May 1 to 31, 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 May 2018 reporting period, one minor compliance incidents occurred, as detailed below :

- May 1, 2018: An SCE biologist observed a Henkels and McCoy (H&M) bulldozer grade an existing access road approximately 180 feet within an active red-tailed hawk buffer and 164 feet within California red-legged frog upland habitat. The incident occurred in Segment 3B near Construct 62. Prior to construction activities occurring, the biologist walked the area with the bulldozer operator and pointed out the Environmentally Sensitive Area (ESA). While operating the bulldozer, the H&M operator missed the ESA signs and graded within the buffer. The biologist informed the operator that he was working within the buffer and the bulldozer was immediately moved outside of the buffer. This incident conflicts with MM BIO-10: Prepare and Implement a Nesting Bird Management Plan.
- May 10, 2018: A dead alligator lizard was observed in a tubular steel pole (TSP) excavation hole on Segment 3B at Construct 63. The TSP hole had been excavated at the end of 2017 and covered with steel plates and plastic; however, the excavated TSP hole cover had been compromised and the hole was not completely sealed. It is unknown how long the hole had been exposed. The lizard carcass was not removed due to safety concerns. The hole was properly resealed. This incident conflicts with MM BIO-6: Wildlife Protection, which requires excavations to be covered at the end of each day.
- May 15, 2018: A kV Structures tool truck slid off the access road to Construct 62 within an ESA buffer for an active red-tailed hawk and within a California red-legged frog upland habitat area. The truck operator was not injured and a tow truck removed the truck within a couple of hours. The area was surveyed by a CPUC-approved avian biologist/U.S. Fish and Wildlife (USFWS)-approved California red-legged frog biologist and a certified arborist/CPUC-approved biologist. The impacted area did not contain aestivation habitat for California red-legged frog, and the adult red-tailed hawk and nestling were observed in the nest on consecutive days after the incident. No protected trees or special status plants were impacted. No liquids were released from the truck. This incident conflicts with MM BIO-1: Limits of Construction Activities, which requires vehicular traffic be restricted to approved access roads, and MM BIO-10: Prepare and Implement a Nesting Bird Management Plan.
- May 17, 2018: An SCE biologist observed six protected trees that had been trimmed on a No Improvement level project access road. The incident was observed on Segment 3B near Construct 73 and was completely outside of approved disturbance limits. The impacted trees included four coast live oaks trees and two non-native heritage sized pepper trees, with 2-10% of the canopies trimmed. The trees were trimmed to provide access for project vehicles. The trees were not flagged with ESA signs prior to the incident, but have since been flagged. The incident conflicts with MM BIO-4: Limit Removal of Native Plants, Trees, and Vegetation Communities.
- May 21, 2018: An SCE biologist observed an H&M civil crew grading within an active spotted towhee nest buffer on Segment 2. Prior to construction activities commencing, the biologist observed an adult spotted towhee in the vicinity of the mapped nest and confirmed installation of ESA flagging based on the mapped nest location; however, the nest was not visible due to heavy vegetation. The biologist communicated the presumed nest location to the H&M crew. Once grading activities began, the biologist observed that the mapped nest location was inaccurate. As a result, the crew was grading within 65 feet of the actual nest location. The biologist halted the operator, who immediately moved the equipment outside of the buffer. The ESA staking was adjusted and grading activities continued outside of the buffer. Subsequent observations of the

nest confirmed the adults continued to visit the two naked nestlings. This incident is in conflict with MM BIO-10: Prepare and Implement a Nesting Bird Management Plan.

- May 24, 2018: An SCE biologist observed a broken branch on a coast live oak tree along Segment 3B near Construct 71. Additionally, the tree was located within two active nest buffers for a northern flicker and a bushtit. It is **unknown if the incident is project related**. This incident conflicts with MM BIO-4: Limit Removal of Native Plants, Trees, and Vegetation Communities.
- May 25, 2018: An SCE biologist observed an area of native vegetation that had been crushed by a heavy duty tracked vehicle partially outside of disturbance limits on Segment 3B on the access road between Constructs 63 and 64. The incident impacted approximately 60 feet by 2 feet of purple sage scrub habitat. This incident conflicts with MM BIO-1: Clearly Mark Project Boundaries and Sensitive Areas, and MM BIO-4: Limit Removal of Native Plants, Trees, and Vegetation Communities.

Additionally, biological monitors reported several observations of non-project emergency crews conducting Thomas Fire restoration work within or near the SBCRP area. Biological monitors have reported observations of parked vehicles within nesting bird buffers and a lack of best management practices (BMPs) covering soil stockpiles as being attributed to these non-project emergency crews. Three minor spills/leaks of hydraulic fluid or motor oil were self-reported by SCE. These incidents were dealt with in a timely manner.

### **Non-compliance Report**

On May 10, 2018, the CPUC issued SCE Non-compliance Report (NCR) #2—a Level 2 NCR—for the May 1, 2018, nesting bird buffer encroachment incident described above. The incident was issued as a Level 2 non-compliance because sensitive resources (an active red-tailed hawk nest with nestling) were at risk. Prior to the issuance of the NCR, SCE took appropriate action by meeting with the crew and individual who encroached within the buffer and discussed the incident and compliance requirements with all crew members at the morning tailboard meetings. The CPUC did not require follow-up documentation.

### **Public Concerns**

On May 22, 2018, a landowner in the vicinity of Constructs 66 and 67 called the CPUC Project Manager (PM) regarding the installation of towers adjacent to her property and damage to the roads near her property. The CPUC PM provided the landowner contact information to SCE, who followed up with a site visit. SCE provided information to the landowner, including heights of the towers (which are under the maximum height described in the Final EIR), Federal Aviation Administration (FAA) compliance, and road repairs. Discussions with the landowners are ongoing.

### **Minor Approvals**

During May 2018, one email approval and two Minor Project Refinement (MPR) were issued (see Table 1).

**Table 1: Minor Approvals for May 2018**

Description	Approval Date
MPR C: Temporary access road to Construct 97	May 3, 2018
Email approval to repair road near Constructs 66 and 67.	May 24, 2018
MPR D: Alternative access road to Tower M8-T2.	May 25, 2018

Sincerely,



Jenny Vick  
Project Manager, Ecology and Environment, Inc.

cc:  
Kenneth Spear, SCE  
Marcus Obregon, SCE

# ATTACHMENT 1

CPUC Site Inspection Report  
May 10 and 15, 2018



## Santa Barbara County Reliability Project CPUC Site Inspection Form

<b>Project:</b>	Santa Barbara County Reliability Project	<b>Date:</b>	May 10, 2018
<b>Project Proponent:</b>	Southern California Edison	<b>Report #:</b>	VS020
<b>Lead Agency:</b>	California Public Utilities Commission	<b>Monitor(s):</b>	Vince Semonsen
<b>CPUC PM:</b>	Jensen Uchida, Energy Division	<b>AM/PM Weather:</b>	Partly cloudy, cool, and calm
<b>E &amp; E CM:</b>	Jenny Vick	<b>Start/End Time:</b>	0700 to 1330
<b>Project NTP(s):</b>	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)

<b>Worker Environmental Awareness Program (WEAP) Training</b>	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		
<b>Erosion and Dust Control (Air and Water Quality)</b>	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		
<b>Equipment</b>	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		
<b>Work Areas</b>	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
<b>Biology</b>	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		
<b>Cultural and Paleontological Resources</b>	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	
<b>Hazardous Materials</b>	Yes	No	N/A
Are hazardous materials that are stored or used on site properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		
Are required fire prevention and control measures in place?	X		
Are contaminated soils properly managed for onsite storage or offsite disposal?	X		
<b>Work Hours and Noise</b>	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)

Carpinteria Yard B, Segments 2, 3, 4, and 5

**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 for the 0700 tailboard meeting at Carpinteria Yard B. Also attending were Rincon environmental project manager John Hindley and BRC Equals 3 (BRC) lead biological monitor Matt Schaap. I asked about the excavation tailings at Construct 132, which appear to have been intentionally left onsite. The Franklin Trail was still closed because crews were pulling wire from Constructs 128 to 133.

I headed to Segment 3B and Constructs 62, 63, and 64 with BRC lead biological monitor Matt Schaap. The plastic covering had been removed from Construct 63 and the kV Structures construction crew planned to drop a cage into the foundation hole. Since the steel plates and plastic covering the foundation holes at Constructs 62 and 63 had been compromised for an unknown amount of time, I asked Matt Schaap and BRC biological monitor Barrett Holland to check the hole for animals before they conduct any work within it (MM BIO-6). I also called Rincon environmental project manager John Hindley and E & E project manager Jenny Vick to discuss the proper channels to ensure that this request is carried out. We discussed the safety issues involved in looking into a deep foundation hole. I suggested they separate the steel plates (Photo 1) to allow only enough space for inspection by binoculars and a strong light.

The drill rig was parked at Construct 64, and the crew planned to drill on the day of my site visit (Photo 2). At Construct 65, the foundation hole had been drilled and the cage set. The crew was waiting on concrete trucks. Work in this area had been delayed due to bird nesting issues and the very steep and rutted access road (APM BIO-3, APM BIO-4). At Construct 66, the foundation had been poured and a crew was onsite pulling off the forms and cleaning the area (Photo 3).

The spring migration of birds was evident, with numerous species of resident and migratory birds seen and/or heard along the SBCRP site (MM BIO-1, MM BIO-10). Unusual birds observed included a blue grosbeak, a yellow-breasted chat, and a rose-breasted grosbeak.

Equipment was parked at Construct 71; however, no construction activity was taking place and the site had not been drilled (Photo 4). At Construct 72, crews were relocating a water line to allow access to the site. They planned to have the water line trench backfilled before the end of the day.

We stopped at Construct 98 where a crew continued to work on the Hilfiker wall (Photo 5).

At our last stop, we conducted a nesting bird survey for the area around Construct 106, as the wire stringing crew planned to be in this area later in the afternoon.

**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)

Verify oversight and compliance with nesting buffers and follow up on dust control.



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

Biologists should use flashlights and binoculars to check the foundation holes at Constructs 62 and 63 for trapped animals when crews pull off the steel plates.




**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
5/10/18	Segment 3B, Construct 63		Photo 1 – Metal plates used to cover the foundation hole.
5/10/18	Segment 3B		Photo 2 – Drill rig parked at Construct 64. Photo facing southwest.
5/10/18	Segment 3B		Photo 3 – Clean-up work being done at Construct 66. Photo facing north.

**REPRESENTATIVE SITE PHOTOGRAPHS**

Date	Location	Photo	Description
5/10/18	Segment 3B, Construct 71		Photo 4 – BMPs are in place, but tree trimming still needs to be done before drilling the foundation.
5/10/18	Segment 4, Construct 98		Photo 5 – Work on the Hilfiker wall continues at this steep site located within an avocado orchard. Photo facing east.



## Santa Barbara County Reliability Project CPUC Site Inspection Form

<b>Project:</b>	Santa Barbara County Reliability Project	<b>Date:</b>	May 15, 2018
<b>Project Proponent:</b>	Southern California Edison	<b>Report #:</b>	VS021
<b>Lead Agency:</b>	California Public Utilities Commission	<b>Monitor(s):</b>	Vince Semonsen
<b>CPUC PM:</b>	Jensen Uchida, Energy Division	<b>AM/PM Weather:</b>	Partly cloudy, cool and calm
<b>E &amp; E CM:</b>	Jenny Vick	<b>Start/End Time:</b>	0700 to 1330
<b>Project NTP(s):</b>	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)

<b>Worker Environmental Awareness Program (WEAP) Training</b>	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		
<b>Erosion and Dust Control (Air and Water Quality)</b>	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		
<b>Equipment</b>	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		
<b>Work Areas</b>	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
<b>Biology</b>	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		
<b>Cultural and Paleontological Resources</b>	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	
<b>Hazardous Materials</b>	Yes	No	N/A
Are hazardous materials that are stored or used on site properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		
Are required fire prevention and control measures in place?	X		
Are contaminated soils properly managed for onsite storage or offsite disposal?	X		
<b>Work Hours and Noise</b>	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)

Carpinteria Yard B, Segments 2, 3, 4, and 5.

**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 for the 0700 tailboard meeting at Carpinteria Yard B. Mike Moss was the Rincon lead biological monitor on the day of my site visit. Also at the tailboard meeting were biological monitors Steve Jones (BRC Equals 3 [BRC]), Yuling Huo (Rincon), and Peter Gaede (BRC). Paul Viggiano, Henkels and McCoy (H&M) Project Manager, spoke to the attendees about respect, working together as a team, and following the project conditions.

I drove to the Highway 150 Yard with lead biological monitor Mike Moss (Rincon) where we met with H&M foreman Jamie Tager who was getting his crew lined out. We then headed up Rincon Mountain to Construct 73 along Segment 3B (Photo 1). This site is located within an avocado orchard and requires some grading and rerouting of an existing agricultural water line. BRC biological monitor Steve Jones was onsite. He had already done a sweep of the area and was waiting for equipment (APM BIO-3, APM BIO-4). Construction crews had been delayed; therefore, Mike Moss redirected Steve Jones to another site. A pair of red-shouldered hawks was nesting to the east of this location, but were quite distant from the construction site.

We traveled back along Segment 3B and checked Constructs 66 (Photo 2) and 65 (Photo 3), both of which had foundations poured and were ready for tower installation. The best management practices (BMPs) at these two sites required maintenance; however, with no rain in the forecast, Rincon biological monitor Mike Moss said it would be preferable to wait until the towers were set before conducting the BMP repairs.

We met BRC avian biologist Morgan Edel who was looking for nesting birds and checking on the known bird nests in the area (MM BIO-1, MM BIO-10). We were above the red-tailed hawk nest in the M7-T4 lattice steel tower along Segment 5. Morgan Edel had a spotting scope trained on the nest to determine the size of the chicks when the chicks might fledge.

A construction crew was onsite at Construct 64 to complete the tower foundation forms; they were planning to pour the foundation on the day of my site visit. From this location, we could see the wire pull work being conducted across the canyon at Constructs 99 to 106. A fire crew in a truck was observing the wire pull and the tower work (MM HZ-2). We could also see the ongoing work on the Hilfiker wall at Construct 98.

We drove to Construct 96 where several crews were onsite conducting BMP work and grading a tower pad (Photos 4 and 5). Rincon biological monitor Yuling Huo was onsite at this location and a paleontological monitor was also onsite (MM CR-13). Dust control was needed at this location (APM AQ-1). We checked in at Construct 97 where Rincon avian biologist Monica Jacinto was stationed. She showed us a black-chinned hummingbird nest in an avocado tree near the access road. The female was on the nest and did not seem disturbed by our presence.

At Construct 62, the drilling crew was setting up a crane in preparation for installation of the foundation cage (Photo 6). The foundation hole was covered with steel plates, plastic, and gravel bags. Foundation holes for Constructs 62 and 63 were checked for animals before the crews began working on them (MM BIO-6). I spoke with BRC biological monitor Barrett Holland about his examination of the holes and the cooperation of the construction teams, and he said that all went well.

The Construct 63 foundation had been poured and a crew was removing the forms (Photo 7). No work was being conducted at Construct 61; however, a bulldozer was parked onsite. Along with Rincon lead biological monitor Mike Moss, I noted a possible house wren nest in a nearby tree. Mike Moss said he would have an avian biologist check the nest.

BRC biological monitor Asher Dietch was stationed at the access road to Construct 99 where an oak titmouse was nesting in a metal pole. At the time of my site visit, the birds did not seem disturbed by the construction activity.

My last stop with Rincon lead biological monitor Mike Moss was at Construct 106 where the wire pulling crew was working (Photo 8).

**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)

Verify oversight and compliance with nesting buffers and follow-up on dust control.

**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
5/15/18	Segment 3B		Photo 1 – Grading work and realignment of an existing water line at Construct 73.
5/15/18	Segment 3B		Photo 2 – Construct 66. Photo facing east.
5/15/18	Segment 3B		Photo 3 – Construct 65. Photo facing north.

**REPRESENTATIVE SITE PHOTOGRAPHS**

Date	Location	Photo	Description
5/15/18	Segment 4, Construct 96		Photo 4 – BMPs are being put in place.
5/15/18	Segment 4, Construct 96		Photo 5 – Grading work continues at Construct 96. Lead biological monitor Mike Moss speaks with the crew foreman.
5/15/18	Segment 3B, Construct 62		Photo 6 – Crane parked near the covered foundation hole.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
5/15/18	Segment 3B, Construct 63		Photo 7 – Crew removing the foundation forms after the concrete pour. Photo facing east.
5/15/18	Segment 4		Photo 8 – Wire pulling crew between Constructs 105 and 106. Photo facing southeast.