



ecology and environment, inc.

Global Environmental Specialists

501 West Broadway, Suite 800
San Diego, California 92101
Tel: (619) 696-0578, Fax: (888) 645-4354

November 14, 2018

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

Re: Monthly Report Summary #11 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 **September 1 through 30, 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 **September 7 and 18, 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 August 2018 provided a compliance summary and included: a description of construction activities from August 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

On September 19, 2018, Southern California Edison (SCE) notified the California Public Utilities Commission (CPUC) that a Henkels and McCoy (H&M) civil crew was conducting tower wreck-out work outside of the disturbance limits and prior to the biological monitor conducting a sweep. The incident occurred on Segment 3B at Construct M5-ST-5. The area affected was surveyed and partially outside approved disturbance limits within a Plummer's baccharis Environmentally Sensitive Area (ESA). Three Plummer's baccharis plants were damaged by being slightly crushed. The damaged plants are expected to survive. ESA signs marking project boundaries and sensitive areas were present and installed correctly. The area affected is protected under Mitigation Measure (MM) BIO-1. The incident had minor impacts on environmental resources; therefore, the CPUC issued a Level 2 Non-Compliance.


Public Concerns

SCE continued discussions with landowners in the vicinity of project components. In September, seven structures between Constructs 101 and 106 were treated with Natina in order to reduce aesthetic impacts. Mr. Dyer confirmed that SCE should apply the treatment to the structure on his property. However, SCE must wait for the next outage in order to apply the Natina. In addition, landowners requested the same treatment for three additional structures (C73-75). SCE is working with the landowners to gather needed information.

Minor Approvals

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

Sincerely,



Caitlin Barns
Project Manager, Ecology and Environment, Inc.

cc:

Kenneth Spear, SCE
Marcus Obregon, SCE

ATTACHMENT 1

CPUC Site Inspection Reports
September 7 and 18, 2018



Santa Barbara County Reliability Project CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	Date:	September 7, 2018
Project Proponent:	Southern California Edison	Report #:	VS029
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Jensen Uchida, Energy Division	AM/PM Weather:	Thick fog clearing late morning, cool & calm
E & E CM:	Caitlin Barns	Start/End time:	0700 hrs – 1230 hrs
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)

Carpinteria Yard, Segments 4 & 3B

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 met with lead environmental monitor Matt Schaap at the Carpinteria yard tailboard. Bio monitors Peter Gaede, Asher Dietch and Mike Moss were at the tailboard; after the short meeting each headed out to their respective sites. Matt said bio monitor Zeph Friedman-Sowden was already out sweeping a number of locations.

Matt and I drove up onto the Vedder property along segment 4, which encompasses TSPs 108 – 119. A crew was already onsite preparing to remove more of the old latticework towers. They were using an excavator to knock down the towers; Asher Dietch was overseeing this work (APM BIO-3). Our first stop was at TSP 109 where the crew had already pulled down the tower and piled up the metal – Photo 1. The metal needed to be hauled off and the tower foundations still needed to be removed. Matt said they were required to dig out and cut off the old foundations 2 feet down – Photo 3.

It was a very foggy up at TSP 108 – Photo 2. We watched as the excavator brought down the one remaining old latticework tower near TSP 108 – Photo 4. They slowly dropped the tower into the existing roadway so there was no damage to any existing vegetation.

Matt and I drove up the Franklin trail access road and out to TSP 120. Crews had already hung the indicator balls on the wires crossing some of the larger canyons – Photo 5. We met Mike Moss and walked out to the 120 work area. Dirt stockpiled on the access road was now being collected by an excavator – Photo 6 - and transported back down to the 120 site for backfilling the Hilfiker wall – Photo 8. This was some of the last work to be done in this area and it will continue for awhile. The staging area just up the hill from the 120 work area looked to be well contained with silt fencing installed around the gravel pile – Photo 7.

At TSP 97 an excavator continued to work on the Hilfiker wall – Photos 9 & 10. They had installed rumble plates and rock on the access road, which made a big difference in keeping down the dust and keeping mud off of the public roadway (APM AQ-1). Bio monitor Zeph was onsite at this location.

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

See the MMs listed in the observed activities descriptions.
All construction personnel appear to be WEAP trained (APM GEN-1)

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

Follow-up on dust control and BMPs.

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
9/07/18	SBCRP – Segment 4, TSP 109		Photo 1 – The old latticework tower has been knocked down and piled up.
9/07/18	SBCRP – Segment 4, TSP 108		Photo 2 – Piles of old latticework tower.
9/07/18	SBCRP – Segment 4, TSP 108		Photo 3 – Old tower foundation partially removed.

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
9/07/18	SBCRP – Segment 4, TSP 108		Photo 4 – Excavator preparing to bring down an old tower.
9/07/18	SBCRP – Segment 4		Photo 5 – Marker balls installed on the wire. Photo facing north

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
9/07/18	SBCRP – Segment 4, TSP 120		Photo 6 – Work in the access road above TSP 120. Photo facing northeast
9/07/18	SBCRP – Segment 4, TSP 120		Photo 7 – Staging area for Hilfiker work. Photo facing north

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
9/07/18	SBCRP – Segment 4, TSP 120		Photo 8 – Hilfiker wall work
9/07/18	Segment 3B, TSP 97		Photo 9 – Hilfiker wall work. Photo facing south

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
9/07/18	Segment 3B, TSP 97	 An aerial photograph of a construction site on a hillside. A large rectangular area is covered with a grid of steel rebar, prepared for a concrete pour. A green tractor is parked on the dirt to the left of the rebar grid. A worker in an orange shirt is visible on the right side of the grid. In the background, there is a yellow excavator and a dirt road. The site is surrounded by dense green vegetation and a river or stream is visible in the distance.	Photo 10 – Hilfiker wall work.



Santa Barbara County Reliability Project CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	Date:	September 18, 2018
Project Proponent:	Southern California Edison	Report #:	VS030
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Jensen Uchida, Energy Division	AM/PM Weather:	Clear & sunny, mild temps no wind
E & E CM:	Caitlin Barns	Start/End time:	0700 hrs – 1130 hrs
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)

Carpinteria Yard, Segments 4 & 3B

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 met with lead environmental monitor Mike Moss at the Carpinteria yard 7 am tailboard. Bio monitors Peter Gaede, Asher Dietch were at the tailboard, Zeph Friedman-Sowden is part of the monitoring team but was already out in the field (APM BIO-3).

Mike and I drove to the C76 tower in segment 3B – Photo 1. Work was ongoing here with an excavator digging out dirt from the access road; it would eventually be recompacted back into the road – Photo 2. Trucks arrived at the site to haul excess dirt to the TSP 99 site. The excavator had a small oil leak that was being captured by a well-placed drip pan. The crew was checking on the source of the leak. Some dirt and rock was sloughing down the slope below the roadwork. I talked with Mike about whether placing some reinforced silt fencing would be helpful at this location.

At C96 a crew was using a motorgrader to regrade the access road, we saw Zeph at this location – Photo 3. They will be bringing in some road base to improve the road. There was some track out onto Hwy 150, Mike made note of it. A sweeper regularly cleans the Hwy 150 roadway (APM AQ-1). Traffic control was in place along Hwy 150 due to the ongoing construction activities at C76, C96 and C99.

We headed up onto the Vedder property where work was being done at TSP 119. There were some compaction issues at the tower so a crew was excavating the pad and recompacting the dirt using a water truck and a vibrating compactor – Photo 5. Peter Gaede was overseeing the work up along the Vedder property. Hilfiker wall work continued at TSP 120, visible just across the canyon from 119 – Photo 4. I looked at the construction activities with my binoculars; it all looked good so we decided not to make the trek out to this location. While walking back to our vehicle we saw a ringneck snake crossing the access road – Photo 6. Peter took photos of the snake and released it away from the road.

Next stop was up at TSP 67 along segment 3B where a crew was doing cleanup work – Photo 7. A MacDrain had been newly installed and needed some BMPs – Photo 8. A number of areas along the access road and around the TSP needed some regrading and BMP installation – Photo 9.

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

See the MMs listed in the observed activities descriptions.
All construction personnel appear to be WEAP trained (APM GEN-1)

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

Follow-up on dust control and BMPs.

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
9/18/18	SBCRP – Segment 3B, C76		Photo 1 – Access road up to the C76 tower. Photo facing east
9/18/18	SBCRP – Segment 3B, C76		Photo 2 – Excavator digging out the access road. Photo facing southwest

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
9/18/18	SBCRP – Segment 3B, C96		Photo 3 – Regrading the access road.
9/18/18	SBCRP – Segment 4, TSP 119 and 120		Photo 4 – Overview of TSPs 119 and 120 looking west from the access road.
9/18/18	SBCRP – Segment 4, TSP 119		Photo 5 – Excavation and recompaction of the tower pad. Photo facing south

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
9/18/18	SBCRP – Segment 4, TSP 119		Photo 6 – Ringneck snake found crossing the access road between TSP 118 & 119.
9/18/18	SBCRP – Segment 3B, TSP 67		Photo 7 – Cleanup work along the access road and staging area. Photo facing northwest
9/18/18	SBCRP – Segment 3B, TSP 67		Photo 8 – MacDrain installation

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
9/18/18	SBCRP - Segment 3B, TSP 67		Photo 9 – Regrading and BMP work needed around the TSP. Photo facing south