ecology and environment, inc.
Member of WSP

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January 15, 2020

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

Re: Monthly Report Summary #14 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 **November 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 **November 16 and 28, 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 October 2018 provided a compliance summary and included: a description of construction activities from October 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 November 2018 reporting period, there were no major compliance incidents. However, biological monitors reported observations of contaminated soil from an oil spill and a pickup truck hydraulic fuel leak. Biological monitors also observed non-project-related damage to a California bay laurel tree. In addition, other non-project related observations included foundation removal of a tower, installation of a McCarthy drain, and several post-Thomas fire restoration work on access roads.

Public Concerns

SCE continued discussions with landowners in the vicinity of project components. In November, SCE received approximately six landowner requests for Natina treatment to structures. However, SCE must evaluate whether the structures meet criteria for Natina treatment. SCE is working with the landowner to gather needed information for a determination.

A homeowner's association group representing property owners that wanted asphalt repair work completed on road(s) near their properties sent a letter to SCE and the CPUC to address several concerns. SCE acknowledged their concern of having heavy equipment drive through small roads on near properties during the construction phase of the project. SCE disagreed with the assertion of having a lack of communication regarding upcoming activities and schedule modifications that may affect property owners. SCE stressed the importance of communicating with property owners of upcoming activities or schedule changes in advance to crews and personnel at daily tailboard meetings. SCE confirmed that the concerned property owners would soon be receiving asphalt repairs on roads.

The letter also stated that drivers of construction vehicles were not respecting speed limitations in project areas, which creates a hazard for the public. To address safety for all parties, SCE emphasized to crews the need to drive safe, careful, and to abide by the speed limit enforced in construction zones. Further, SCE confirmed that construction crew and personnel reminders to drive safe occur at tailboard meetings.

Minor Approvals

During November 2018, 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 Reports

November 16 and 28, 2018

Santa Barbara County Reliability Project
CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	**Date:**	November 16, 2018
Project Proponent:	Southern California Edison	**Report #:**	VS034
Lead Agency:	California Public Utilities Commission	**Monitor(s):**	Vince Semonsen
CPUC PM:	Jensen Uchida, Energy Division	**AM/PM Weather:**	Partly cloudy, cool temperatures, and calm winds
E & E CM:	Fernando Guzman	**Start/End Time:**	0700 to 1100
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 are 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 and 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 arrived onsite and met with lead environmental biologist Mike Moss at the Carpinteria Yard for the 0700 tailboard meeting. Other biological monitors onsite were Dave Wappler and Yuling Huo (APM BIO-3).

We traveled toward a landowner's property, where the Henkels & McCoy (H&M) crew had done some "fire restoration" work around TSP 107 – Photo 1. They removed one of the access roads and installed best management practices (BMPs) on the restored slopes. Disturbed locations needed additional BMPs. I noted that there were no drip pans under any of the parked equipment (bulldozer, excavator, and compactor) and a gas can remained onsite with minimal containment. Mike Moss mentioned he would discuss this with the construction crew. Crews needed to hydroseed this area.

We inspected the restored construction area near tubular steel pole (TSP) 112. A small parking area cut into the dripline of several oak trees that remained, and the area could use additional restoration – Photo 2. Only a few straw wattles have been implemented for this area. After my site visit, I sent a notification email to Marcus Obregon from SCE.

We drove to Segment 3B to inspect the TSP 76 access road work. The Hilfiker wall work was completed and additional BMPs were added – Photo 3. Mike Moss said crews would be returning to this site to address the issues with the steep slopes along the access road.

We traveled to Segment 4 and TSP 97. A crew was working on the final grading of the access road. The H&M foreman anticipated completion in one to two days – Photo 5. Crews still needed to install BMPs and hydroseed the area. Dave Wappler was the onsite biological monitor at this location. The access road toward the TSP and the small parking area along Highway 150 was extremely dusty. I noted several inches of "moon dust" – Photo 4. I discussed dust control issues with both the Rincon monitors and the H&M foreman.

At the Franklin Trail access road, Yuling Huo, monitored the area. A crew was cleaning a staging area along the small drainage running near the project site – Photo 8. There was also cleaning activities occurring at TSP 135, and a McCarthy drain installation crew was working near TSP 125. Mike Moss and I drove to TSP 128, where additional BMPs were added – Photos 6 & 7. However, additional BMPs were needed, including installation of jute netting and more wattles, prior to hydroseeding.

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

See 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)

Follow-up on BMPs and restoration work 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 resourcesIf you checked this box, describe the incident below and follow-up to ensure correction.

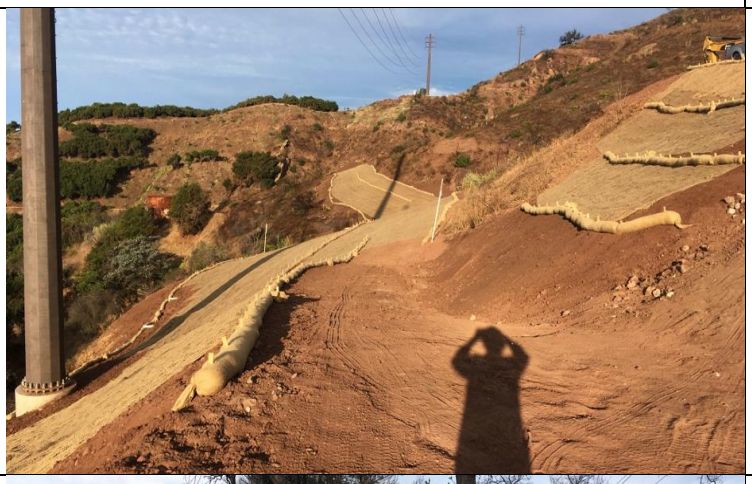
☐ Non-Compliance Level 2: An action that deviates from project requirements or mitigation measures that has caused, or has the potential to cause minor impacts on environmental resources A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing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

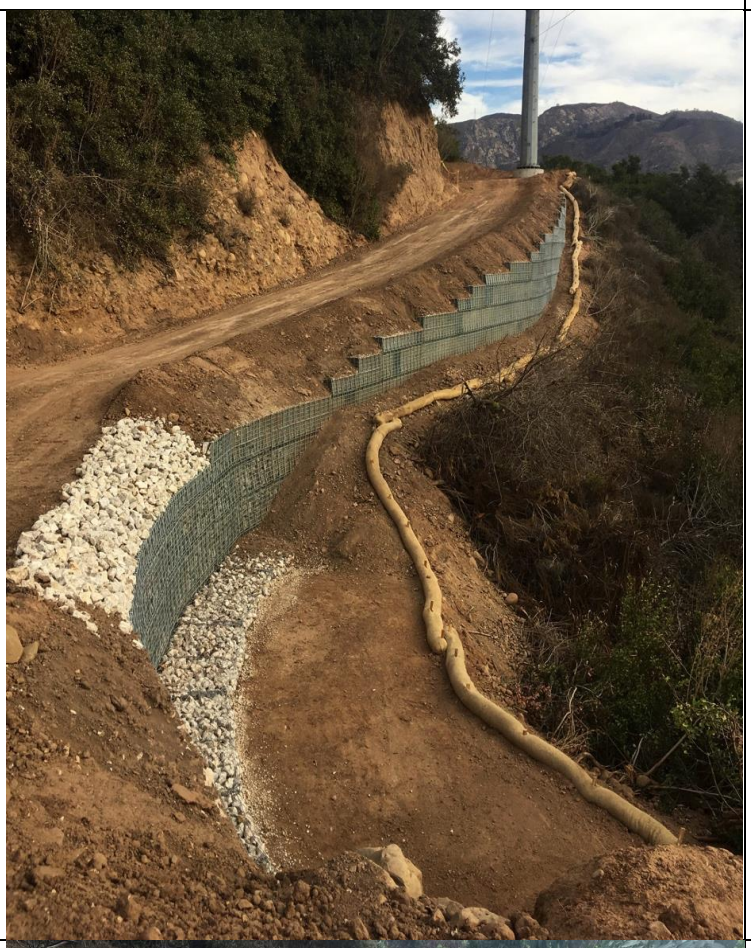
☐ Non-Compliance Level 3: An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the APMs, mitigation measures, permit conditions, approval requirements (e.g. minor project changes, 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
11/16/18	SBCRP – Segment 4, TSP 107		Photo 1 – "Fire restoration" work completed at TSP 107. Photo facing west.
11/16/18	SBCRP – Segment 4, TSP 112		Photo 2 – Cut bank needing restoration. Photo looking west.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
11/16/18	SBCRP – Segment 3B, TSP 76		Photo 3 – Hilfiker wall along TSP 76 access road. Photo facing east.
11/16/18	SBCRP – Segment 4, TSP 97		Photo 4 – Very dusty access road to TSP 97.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
11/16/18	SBCRP – Segment 4, TSP 97		Photo 5 – Final grading work being completed near TSP 97. Photo facing east.
11/16/18	SBCRP – Segment 4, TSP 127		Photo 6 – BMP installation around TSP 127. Photo facing west.
11/16/18	SBCRP – Segment 4, TSP 128		Photo 7 – BMPs needed at TSP 128. Photo facing southwest.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
11/16/18	SBCRP – Segment 4 Franklin Trail access road		Photo 8 – Clean-up of a staging area along a creek drainage. Photo facing south.

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	12/3/18

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	12/3/18

Santa Barbara County Reliability Project
CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	**Date:**	November 28, 2018
Project Proponent:	Southern California Edison	**Report #:**	VS035
Lead Agency:	California Public Utilities Commission	**Monitor(s):**	Vince Semonsen
CPUC PM:	Jensen Uchida, Energy Division	**AM/PM Weather:**	Cloudy with rain expected later in the day
E & E CM:	Fernando Guzman	**Start/End Time:**	0830 to 1200
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 are 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 and 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 biologist Mike Moss at 0830 at the Carpinteria Yard. This yard was still being dismantled – Photo 1. A storm system was predicted to move through the area over the next two days.

On the way to the project site we encountered Rincon biologist John Hindley who was meeting with Southern California Edison (SCE) Environmental Project Manager Marcus Obregon and several people from Santa Barbara County. They were touring the project site looking at tree impacts.

We drove toward the Franklin Trail access road where Henkels and McCoy (H&M) crews were installing McCarthy drains. Biological monitor Yuling Huo was parked near tubular steel pole (TSP) 128; she was waiting for the crews who were delivering construction materials (APM BIO-3). She said they may cancel work activities due to the incoming storm and the possible slippery road conditions.

We drove to the end of the access road near TSP 120. The access road was very steep and best management practices (BMPs) were installed where needed – Photo 2. Mike Moss was one of the Storm Water Pollution Prevention Plan (SWPPP) inspectors and we discussed the need for additional BMPs. It appeared that gravel check dams, additional straw wattles, and hydroseeding were needed.

Water was channeling correctly into the McCarthy drain at the bottom of the TSP 120 access road – Photo 3, and the McCarthy drain itself appeared to be properly installed – Photo 4.

While we were on the Franklin Trail access road, it began to rain. Mike Moss notified another project biologist about the possibility of conducting red-legged frog surveys if there was a heavy rainfall.

We traveled toward TSP 99 where an H&M crew was completing the finishing touches to the access road – Photo 5. The foreman mentioned that a completion date was dependent on the weather. Some excess soil was being used to build a berm around the edge of the Hilfiker wall – Photo 6. Dave Wappler was the onsite biologist for that area.

Our last stop was along Segment 3 at TSP 76 where a crew was installing additional BMPs – Photo 7.

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

See the mitigation measures (MMs) listed in the observed activities descriptions.
All construction personnel appear to have 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)

Follow-up on BMPs and restoration work 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.

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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
11/28/18	SBCRP – Carpinteria Yard		Photo 1 – Carpinteria yard being dismantled. Photo facing south.
11/28/18	SBCRP – Segment 4, TSP 120		Photo 2 – Steep access road down to TSP 120.
11/28/18	SBCRP – Segment 4, TSP 120		Photo 3 – McCarthy drain near TSP 120.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
11/28/18	SBCRP – Segment 4, TSP 120		Photo 4 – McCarthy drain near TSP 120.
11/28/18	SBCRP – Segment 4, TSP 99		Photo 5 – Final road grading at TSP 99.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
11/28/18	SBCRP – Segment 4, TSP 99		Photo 6 – Final dirt work around the TSP 99 Hilfiker wall. Photo facing southwest.
11/28/18	SBCRP – Segment 3, TSP 76		Photo 7 – BMP work along the TSP 76 access road. Photo facing east.

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	12/11/18

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	12/12/18