

April 6, 2019

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

Re: Monthly Report Summary #17 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 **March 1 through 31, 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 **March 26, 2019**. Site inspection reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and applicant proposed measures (APMs) were completed for each site visit. A report is attached below (Attachment 1).

Several compliance concerns occurred during the period from March 1 to 31, 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 March 2019 provided a compliance summary and included: a description of construction activities from March 1 to 31,

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

- On March 12, 2019, a biologist observed a non-project Henkels and McCoy (H&M) civil crew applying a mix of native and non-native rock fill to the access road and that a non-project McCarthy Drain had been installed near a tributary to Sutton Canyon Creek as part of the post-Thomas Fire restoration work. The incident was observed on Segment 4 near and was in a California red-legged frog habitat area. The area affected was surveyed and was completely inside approved disturbance limits. Water was present in the tributary. No California red-legged frogs were observed. ESA signs were present and installed correctly. The incident was not project related. This incident conflicts with **MM-BIO-1: Clearly mark project boundaries and sensitive areas.**
- On March 12, 2019, a biologist observed a non-project Henkels and McCoy (H&M) civil crew excavating a large trench and piling rocks on the access road near Sutton Canyon Creek as part of the post-Thomas Fire restoration work. The trench was approximately 10 feet wide, 30 feet long, and 4 feet deep. The pile of rocks in front of the trench was approximately 10 feet wide and 4 feet tall. The trench exposed the roots of two coastal live oaks. The incident was observed on Segment 4 and was in a California red-legged frog habitat area. The area affected was surveyed and was completely inside approved disturbance limits. Water was present in the creek. No California red-legged frogs were observed. ESA signs were present and installed correctly. The incident was not project related. This incident conflicts with **MM BIO-1: Clearly marked boundaries and sensitive areas** and **MM BIO-4: Limit the removal of native trees, plants, and vegetation communities.**
- On March 13, 2019, a biologist observed evidence of cattle grazing in the restoration site. The incident was observed on Segment 2 and was not in any listed species habitat. The area affected was surveyed and was partially inside approved disturbance limits. Grazing has resulted in minor impacts to the hydroseeded area due to the newly established plants being browsed and trampled (impacts outside the restoration site were moderate). 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.**
- On March 13, 2019, a biologist observed evidence of cattle grazing at multiple restoration sites. The incident was observed on Segment 3B and was not in any listed species habitat. The areas affected were surveyed and were partially inside approved disturbance limits. Grazing has resulted in minor to moderate impacts to the hydroseeded area due to the newly established plants being browsed and trampled. 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.**
- On March 13, 2019, a biologist observed evidence of cattle grazing at multiple restoration sites. The incident was observed on Segment 4 and was not in any listed species habitat. The areas affected were surveyed and were partially inside approved disturbance limits. Grazing has resulted in minor to moderate impacts to the hydroseeded area due to the newly established plants being browsed and trampled. Some best management practices (BMPs) were also observed to be damaged. The incident was not project related. This incident conflicts with **MM BIO-5: Prepare and implement a Habitat Restoration and Mitigation Plan; Purchase mitigation.**

- On March 16, 2019, a biologist observed evidence of herbicide use within restoration areas. The incident was observed on Segment 4 and was not in any listed species habitat. The areas affected were surveyed and were partially inside approved disturbance limits. Herbicide application resulted in minor to major impacts to the newly establishing plants in the hydroseeded areas. The incident is not project related. This incident conflicts with **MM BIO-5: Prepare and implement a Habitat Restoration and Mitigation Plan; Purchase mitigation credits.**
- On March 22, 2019, a biologist observed a non-project Pacific Restoration Group crew applying hydroseed to five non-project McCarthy drains as part of the post-Thomas Fire restoration work. The incident was observed on Segment 4 and was partially in a California red-legged frog habitat area. The area affected was surveyed and was completely outside approved disturbance limits. No California red-legged frogs were observed. Environmental Sensitive Areas (ESA) signs were present and installed correctly. The incident was not project related. This incident conflicts with **MM-BIO1: Clearly mark project boundaries and sensitive areas.**
- On March 27, 2019, a biologist observed that vegetation had been freshly cut with a weed whacker at a restoration site and vehicle disturbance had impacted vegetation at another restoration site. The incident was observed on Segment 4 and was not in any listed species habitat. Approximately 70% of the restoration areas were affected. The area affected was completely inside approved disturbance limits. The weed whacking occurred at Construct 94 and vehicle disturbance occurred at Constructs 137, 142, and Stringing 21. The impacts have resulted in moderate impacts to the hydroseeded areas due to the newly established plants being cut/removed or crushed. 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.**
- On March 28, 2019, a biologist observed that vegetation had been freshly cut with a weed whacker at two work areas, one of which is a restoration site. The incident was observed on Segment 3B and was not in any listed species habitat. The area affected was completely inside approved disturbance limits. The weed whacking resulted in moderate impacts to the hydroseeded restoration area at Construct 69 due to newly established plants being cut/removed. Approximately 70% of the restoration area was affected. 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.**
- On March 28, 2019, a biologist observed that a large area had been cleared and graded, a coast live oak had been removed, and a bridge had been built over Sutton Canyon Creek as part of the post-Thomas Fire restoration work. The incident was observed on Segment and was in a California red-legged frog habitat area and designated critical habitat for steelhead. The area affected was surveyed and was partly inside approved disturbance limits. The graded area is approximately 2,500 square feet and located between the access road and Sutton Canyon Creek on the west side of the creek. The work in this area caused additional impacts to the roots of a coast live oak tree that had been previously reported. Grading also occurred approximately three feet beyond the road prism on the north side of the access road west of the creek, resulting in approximately 100 square feet of additional disturbance and the removal of a coast live oak. The bridge across Sutton Canyon Creek is constructed of steel plates and secured and sealed with non-native rock and road base within the road prism. Water was present in the creek. No California red-legged frogs or steelhead were observed. ESA signs were present and installed correctly. The incident was not project related. The incident conflicts with **MM BIO-1 (Clearly mark project boundaries and sensitive areas).**
- On March 28, 2019, a biologist observed a non-project McCarthy drain that had been installed by a non-project 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 inside approved disturbance limits. The incident was not

project related. This incident conflicts **with MM BIO-1: Clearly mark project boundaries and sensitive areas.**

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

- On March 26, 2019, the CPUC Compliance Monitor noted restoration issues regarding non project-related cattle grazing and stormwater runoff erosion along Segment 4. The CPUC Compliance Monitor recommended installing well-placed water bars and additional BMPs to support restoration efforts.

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

Public Concerns

There were no public concerns during March 2019.

Minor Approvals

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

Sincerely,



Fernando Guzman
Project Manager, Ecology and Environment, Inc.

cc:

Kenneth Spear, SCE
Marcus Obregon, SCE

ATTACHMENT 1

CPUC Site Inspection Report

March 26, 2019



Santa Barbara County Reliability Project CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	Date:	March 26, 2019
Project Proponent:	Southern California Edison	Report #:	VS039
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Connie Chen, Energy Division	AM/PM Weather:	Partly cloudy with cool temperatures and a slight breeze
E & E CM:	Fernando Guzman	Start/End time:	0800 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 in place to stabilize soils and effectively suppress fugitive dust?	X		
Equipment	Yes	No	N/A
Are observed vehicles maintaining a speed limit of 15 mph on unpaved roads?	X		
Are observed vehicles/equipment arriving onsite clean of sediment or plant debris?	X		
Are observed vehicles/equipment turned off when not in use?	X		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	X		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	X		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	X		

Are excavations and trenches covered at the end of the day?	X		
Are wildlife escape ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?			X
Biology	Yes	No	N/A
Have preconstruction surveys been completed for biological (wildlife, nesting birds, coastal California gnatcatcher, least Bell's vireo) resources, as appropriate?	X		
Are biological monitors present onsite?	X		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	X		
Have wildlife been relocated from work areas? If yes, describe below.		X	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)? If yes, describe below.		X	
Did you observe any threatened or endangered species? If yes, describe below.		X	
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features?	X		
Have there been any work stoppages for biological resources? If yes, describe below.		X	
Cultural and Paleontological Resources	Yes	No	N/A
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			X
Are archaeological and paleontological monitors onsite, if needed?	X		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			X
Have there been any work stoppages for cultural/paleo resources? If yes, describe below.		X	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used on site properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		
Are required fire prevention and control measures in place?	X		
Are contaminated soils properly managed for onsite storage or offsite disposal?	X		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?			X
Is construction occurring within approved hours?	X		
Are required noise control measures in place?	X		

AREAS MONITORED (i.e., structure numbers, yards, or substations)

Segments 3B and 4

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

I arrived onsite and met with lead environmental biologist Mike Moss at 0800 near the Carpinteria Substation.

Mike Moss said there was one active nest near one of the staging areas. It was a bushtit nest, and he placed a buffer around it. He was inspecting the best management practices (BMPs) installed as well as revegetation efforts at several locations on Hailey Ranch.

We inspected the revegetation on the slope located below the access road and around the McCarthy drain at tubular steel pole (TSP) 55 on segment 3B – Photo 1. The disturbed area contained a significant amount of new growth. Unfortunately, most of it was black mustard, which is a non-native plant.

We stopped at the next tower near TSP 56, where Mike Moss took photos at fixed point locations – Photo 2. This location did not appear to require additional grading, since the tower's location was readily accessible and flat.

Cattle grazing on Hailey Ranch overwhelmed the BMPs installed as well as the previous restoration efforts – Photo 3.

I noted extensive vegetation coverage at TSP 78 on Segment 4; however, it was mostly mustard and milk thistle – Photo 4.

We drove past the “Y” yard, which was restored and supported a substantial amount of vegetation growth.

At TSP 80, along Segment 4, there were restoration issues regarding cattle grazing and stormwater runoff erosion – Photo 5. Some well-placed water bars and additional BMPs would help the restoration effort.

At TSP 98, materials were placed to build a guard rail around a portion of the tower pad – Photo 6.

At TSP 99, a Henkels and McCoy (H&M) crew was completing the guardrail installation – Photo 7.

Our last stop was on the Franklin Trail access road, where a crew was conducting final improvements to a gabion wall - Photo 8.

We spoke to an H&M crew member named Sandy who notified us that crews had almost completed a temporary bridge over Sutton Creek. The temporary bridge would allow crews to access the areas in the backcountry, where activities such as road grading and McCarthy drain installation continued.

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

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

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

Restoration of the small parking pad at TSP 112.

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




COMPLIANCE SUMMARY




Below please describe any non-compliance issues or new biological/cultural discoveries (compliance level 0) that have occurred since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to E & E Compliance Manager. Inform E & E CM of any non-compliance incidents.

- New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.
- Non-compliance – Level 1: An action that deviates from project requirements or results in the partial implementation of the mitigation measures, but has not caused, or has the potential to cause impacts on environmental resources. If you checked this box, describe the incident below and follow-up to ensure correction.
- 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
03/26/19	SBCRP – Segment 3B TSP 55		Photo 1 – Restoration evaluation. Photo facing south.
03/26/19	SBCRP – Segment 3B TSP 56		Photo 2 – Restoration evaluation. Photo facing east.
03/26/19	SBCRP – Segment 4		Photo 3 – Grazing activities impacted the BMPs. Photo facing south.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
03/26/19	SBCRP – TSP 78, Segment 4		Photo 4 – Restoration photos taken by Mike Moss. Photo facing west.
03/26/19	SBCRP – TSP 80, Segment 4		Photo 5 – Erosion and grazing impacted the restoration efforts at this tower location. Photo facing southwest.
03/26/19	SBCRP – TSP 98, Segment 4		Photo 6 – Guard rail installation work would begin soon.

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
03/26/19	SBCRP – TSP 99, Segment 4		Photo 7 – Newly installed guardrail. Photo facing southwest.
03/26/19	SBCRP – Segment 4		Photo 8 – Gabion wall installed along the Franklin access road. Photo facing southwest.

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	03/31/19

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	03/31/19