

January 18, 2020

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

Re: Monthly Report Summary #19 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 **August 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 **August 21, 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 August 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 August 2019 provided a compliance summary and included: a description of construction activities from August 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 August 2019 reporting period, there were no SCE self-reported compliance observations or project-related compliance incidents.

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

- On August 21, 2019, the CPUC Compliance Monitor noted that a temporary bridge over Sutton Creek was removed, leaving a dirt crossing. Furthermore, a large pile of rock and soil was left within the riparian corridor. This work was considered “non-project” related, and no revegetation or stabilization efforts were completed on the pile.

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

Public Concerns

There were no public concerns during August 2019.

Minor Approvals

During December 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 Report

August 21, 2019



Santa Barbara County Reliability Project CPUC Site Inspection Form

Project:	Santa Barbara County Reliability Project	Date:	August 21, 2019
Project Proponent:	Southern California Edison	Report #:	VS041
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Connie Chen, Energy Division	AM/PM Weather:	Clear and warm temperatures with a light breeze
E & E CM:	Fernando Guzman	Start/End Time:	0900 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 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 Rincon environmental biologist Mike Moss at 0900 near the Carpinteria Substation. Replacement and repair of some best management practices (BMPs) was being completed at a few locations, and Mike Moss was clearing the work sites and overseeing the activities. They hoped to complete the BMP replacement/repairs this week and would then follow up with hydro-mulching at those sites.

Our first stop was at tubular steel pole (TSP) 99, where the BMP restoration was completed. Crews were removing the old BMPs and installing straw wattles around the impacted areas – Photo 1. Afterward, crews installed new straw wattles where necessary. The areas to be upgraded were determined by site visits by Mike Moss and the Rincon Stormwater Pollution Prevention Plan (SWPPP) inspector Caitlyn Teague.

We traveled to TSP 100, which would be the following stop for the BMP installation crew. Mike Moss conducted a clearing sweep to ensure that there were no animals or nesting birds. This location was within an avocado orchard and there were no issues.

At TSP 98, we encountered the BMP installation crew conducting repair/upgrade work – Photo 2. Mike informed the crew that they could move to TSP 100 after they completed that work. The crew was completing a “Type 2” straw wattle installation that did not require digging a shallow trench for the wattle. In addition, the stakes would not be driven through the wattle to anchor it. The wattle was placed on the slope and anchored using stakes on both sides and twine to cinch it down to the ground. This appeared to be a better way of anchoring the wattle to the ground.

We drove toward the Franklin Trail access road to inspect several locations scheduled for BMP upgrades. We stopped at one of the McCarthy drains along the access road where crews may remove the wattles since they were installed parallel to the slope. This area tends to focus the rainwater runoff instead of slowing it – Photo 3.

We stopped at TSPs 126, 127 and 128 where additional wattle installations were planned – Photo 4. The McCarthy drain at TSP 128 appeared to be in good condition, despite most of the vegetation growing on the disturbed slope being weeds – Photo 5. Mike Moss noted that the old tower foundations remained in place below the new TSP 128 towers. In several areas crews removed the old foundations and in others the foundations were left in place; neither Mike Moss nor I understood the reason for this inconsistency.

The temporary bridge over Sutton Creek was removed, leaving a dirt road crossing – Photo 6. A fairly large pile of rock and soil was left within the riparian corridor; it was considered “Non-Project Related” work. Revegetation and stabilization were not completed on this pile – Photo 7.

We drove out to the end of the road at TSP 120, where the BMPs appeared to be in good condition on the steep access road – Photo 8.

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)

Removal of the old tower foundations at TSP 128.
 Clarification of the determination for work considered to be “Non-Project Related.”

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




Leaving a type of culvert at the Sutton Creek crossing may prevent further damage to the creek.



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
08/21/19	SBCRP		Photo 1 – BMP upgrades at TSP 99. Photo facing north.
08/21/19	SBCRP		Photo 2 – BMP work at TSP 98. Photo facing east.
08/21/19	SBCRP		Photo 3 – McCarthy drain along the Franklin Trail access road.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
08/21/19	SBCRP		Photo 4 – Restored slope between TSPs 126 and 127. Photo facing west.
08/21/19	SBCRP		Photo 5 – McCarthy drain below TSP 128. Photo facing south.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
08/21/19	SBCRP		Photo 6 – Road crossing at Sutton Creek along the Franklin Trail access road. Photo facing northwest.
08/21/19	SBCRP		Photo 7 – Excess soil near the Sutton Creek crossing. Photo facing south.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
08/21/19	SBCRP		Photo 8 – Steep access road down to TSP 120. Photo facing southeast.

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	08/26/19

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	08/26/19