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PROJECT MEMORANDUM

SCE WEST OF DEVERS (WOD) UPGRADE PROJECT

To: Billie Blanchard, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Date: September 20, 2018
Subject: Monitoring Report #32: September 10 to 16, 2018

Introduction

This report provides a summary of the construction and compliance activities associated with Southern California Edison’s (SCE) West of Devers (WOD) Upgrade Project.

CPUC Environmental Monitor (EM): CPUC EM Jamie Miner was onsite September 11, 12, and 13. CPUC Lead EM was onsite September 11, 12, and 13.

CPUC Notices to Proceed (NTPs)

Table 1 summarizes the NTPs with construction for the WOD Upgrade Project.

Table 1 - NTPs
(Updated 09/20/18)

NTP #	Date Requested	Date Issued	Phase	Description
NTP #1	04/04/17	06/29/17	Material Yards	Construction or use of 10 Material Yards
NTP #2	05/18/17	06/29/17	Substation Upgrades	Upgrades to 5 existing Substations
NTP #3	06/05/17	08/10/17	Distribution, Subtransmission, and Telecom	Construction of the Distribution, Subtransmission, and Telecommunication portions of the Project
NTP #4	07/13/17	09/05/17	Transmission	Transmission Line Construction on private lands
NTP #5	08/07/17	03/29/18	Construction on BLM lands	Transmission Line construction on BLM lands

Construction & Compliance

A summary of construction and compliance activities is provided below by NTP.

Material Yards (NTP #1)

As defined in NTP #1, Project material yards (MY) include:

- Mountain View #1 MY
- Lugonia MY
- Grand Terrace MY
- Poultry MY

- San Timoteo MY
- Beaumont #1 MY
- Beaumont #2 MY
- Matich MY
- Hathaway #2 MY
- Devers MY

To date, all material yard pre-compliance materials associated with NTP #1 that have been submitted, have been approved.

Summary of Construction Activity

1. For the currently approved MYs, all activities are being performed by the contractor operating out of each respective yard. No MY construction activities were conducted during the subject reporting period.
2. The Poultry MY is being utilized by Barnard Construction and Power Grade Incorporated as their primary base of operations and material/equipment storage location. Work associated with the Poultry MY included material/equipment deliveries and general yard maintenance throughout the monitoring period.
3. The Matich MY is being utilized by Barnard Construction primarily for tubular steel pole (TSP) storage.
4. The Mountain View #1 MY is being utilized by Hot Line Construction as their primary base of operations and materials/equipment storage location. Work associated with the Mountain View #1 MY was limited to material/equipment deliveries and general yard maintenance throughout the monitoring period.
5. The Beaumont #2 MY is being utilized by CJ/Aldridge Drilling as their primary base of operations and material/equipment storage location. Material/equipment deliveries and general yard maintenance occurred at the Beaumont #2 MY throughout the monitoring period.
6. The Grand Terrace MY is being used primarily as a show-up location for project construction crews.
7. No project-related activities occurred at the Devers MY throughout the monitoring period.

Environmental Compliance

1. CPUC EMs noted two forklifts staged at the Matich MY without Air Quality Compliance Stickers which document compliance with off road equipment air quality standards (see Figure 1). SCE recorded this as a Level 1 incident. At the Beaumont 2 MY, uncovered 2-inch diameter pipe was observed (see Figure 2). This conflicts with Mitigation Measure (MM) WIL-1b, Ensure Wildlife Impact Avoidance and Minimization. SCE documented this as a Level 1 incident. Also, at the Beaumont 2 MY, the CPUC EMs noted concrete residue on the ground near some foundation forms (see Figure 3). SCE was notified of the spill.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #1 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #1.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #1 identified during the monitoring period.

4. The 2018 nesting season has ended. If required, removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project Nesting Bird Management Plan (NBMP). There were no such nests removed from work areas associated with NTP #1 recorded during the monitoring period.
5. No special-status species were observed or identified at locations associated with NTP #1 during the monitoring period.

Substations (NTP #2)

Five substations are identified for improvements in NTP #2. These include:

- Etiwanda Substation
- San Bernardino Substation
- Vista Substation
- El Casco Substation
- Devers Substation

The preconstruction packages for the Etiwanda, Vista, and Devers Substations were submitted by SCE on July 23, 2018. CPUC authorization for each of these substation was granted on July 26, 2018.

Summary of Construction Activity

1. For the currently approved substation components, all work is being conducted by SCE crews.
2. Work associated with the Vista Substation included conducting pulling cable into the MEER Building switchrack.
3. No construction activities associated with the Etiwanda Substation occurred throughout the monitoring period.
4. No construction activities associated with the San Bernardino Substation occurred throughout the monitoring period.
5. No construction activities associated with the El Casco Substation occurred throughout the monitoring period.
6. No construction activities associated with the Devers Substation occurred throughout the monitoring period.

Environmental Compliance

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #2 throughout the monitoring period.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #2 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #2.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #2 identified during the monitoring period.
4. The 2018 nesting season has ended. If required, removal of inactive non-special-status bird species' nests is being implemented per the requirements of the NBMP. There were no such nests removed from work areas associated with NTP #2 recorded during the monitoring period.

5. No special-status species were observed or identified at locations associated with NTP #2 during the monitoring period.

Distribution, Subtransmission, and Telecommunication Work (NTP #3)

As defined in NTP #3, distribution improvements consist of three work packages. These include:

- Dental 12-kV Distribution Circuit (Dental Circuit)
- Intern 12-kV Distribution Circuit Underbuild (Intern Circuit)
- Reconductor on Juanita Street (Juanita Reconductor)

As defined in NTP #3, subtransmission improvements consist of three work packages. These include:

- Removal of San Bernardino–Redlands-Timoteo and the San Bernardino–Redlands-Tennessee 66-kV Lines (Timoteo-Tennessee Removal)
- Relocation of San Bernardino–Redlands-Timoteo 66-kV Lines (Timoteo Relocation)
- Relocation of San Bernardino–Redlands-Tennessee 66-kV Lines (Tennessee Relocation)

As defined in NTP #3, telecommunication improvements consist of six work packages. These include:

- San Bernardino Substation Connection to Redlands Inland Empire District Office (San Bernardino Connection),
- Timoteo-Redlands District Office Fiber Optic Cable Connection (Timoteo-Redlands Connection),
- El Casco Substation Connection to Vista Moreno OPGW (El Casco Connection),
- Maraschino Substation Connection to Devers-Valley OPGW (Maraschino Connection),
- El Casco–Banning Connection to Devers-Vista Skywrap (El Casco–Banning Connection), and
- Banning Substation Connection to Devers-Valley OPGW (Banning Connection).

To date, all telecommunication, distribution, and subtransmission pre-compliance materials associated with NTP #3 have been submitted and approved.

Summary of Construction Activity

1. For the currently approved subtransmission and distribution components, major construction activities are being performed primarily by Hot Line Construction with support from Barnard Construction and SCE crews.
2. Distribution work associated with the Dental and Intern Circuits included trenching for underground alignment, installation of underground vaults, and sidewalk restoration.
3. Work associated with the Timoteo Relocation subtransmission improvements included preparation and pouring of foundations.
4. Work associated with the Tennessee Relocation subtransmission improvements included preparation and pouring of foundations.
5. Work associated with the Banning Connection included excavation and installation of underground conduit and trench backfilling for the underground conduit. The contractor also demobilized from the project.
6. No construction activities associated with the Juanita Reconductor occurred throughout the monitoring period.

7. No construction activities associated with the Timoteo-Tennessee Removal occurred throughout the monitoring period.
8. No construction activities associated with the San Bernardino Connection occurred throughout the monitoring period.
9. No construction activities associated with the Timoteo-Redlands Connection occurred throughout the monitoring period.
10. No construction activities associated with the El Casco Connection occurred throughout the monitoring period.
11. Work associated with the Maraschino Connection telecommunications improvements has been completed.
12. Work associated with the El Casco–Banning Connection telecommunications improvements has been completed.

Environmental Compliance

1. On September 10, an unanticipated cultural discovery was made during excavation along Mission Road. Work was halted in the immediate area and a 100-ft buffer was established in order to further evaluate the find. The feature was recorded and was determined not to be significant.
2. On September 11, the CPUC EMs observed equipment staged at the end of the day associated with the underground trenching work along Mission Road. A small dozer (bobcat) was parked on dry vegetation and was missing a drip pan (see Figure 4). The Fire Management Plan (Section 2.1.2.6) states, “Motor vehicles will not be parked or operated outside of cleared work areas, except for the specific purpose of clearing vegetation”. The project’s Environmental Monitor was notified, and a drip pan was placed under the equipment. Crews were also reminded not to park on dry vegetation because of fire danger.
3. On September 13, another feature was exposed while trenching along Mission Road. Work was again halted within 100-ft of the find so it could be further evaluated.
4. While moving a truck across Iowa Street, the bucket of a line truck became caught in a phone service line and a fiber optic cable attached to a nearby building. Repairs were made the same day.
5. Due to power loading issues associated with hot weather, line outages in place to perform underground conductor wire installation are being periodically rescheduled to overnight hours. A revised encroachment permit from the City of Redlands, which included approval for overnight work associated with installation of underground cable only, was provided on July 25, 2018.
6. There were no SWPPP maintenance items or corrective actions associated with NTP #3 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #3.
7. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #3 identified during the monitoring period.
8. The 2018 nesting season has ended. If required, removal of inactive non-special-status bird species’ nests is being implemented per the requirements of the NBMP. There were no such nests removed from work areas associated with NTP #3 recorded during the monitoring period.
9. Special-status species observed or identified at locations associated with NTP #3 during the monitoring period included golden eagle.

Transmission Work (NTP #4)

NTP #4 includes six transmission line segments, identified as Segments 1 through 6, generally moving from west to east.

To date, pre-compliance materials associated with NTP #4, Segments 1 through 4, have been submitted and approved. Pre-construction compliance materials for Segments 5 and 6 are scheduled for submittal late-2018/early-2019.

Summary of Construction Activity

1. For the currently approved transmission components, Power Grade Incorporated is conducting access road maintenance/stabilization, BMP installation, vegetation removal, and site grading. CJ/Aldridge Drilling is performing foundation work.
2. Work associated with Segment 1 included grading and vegetation clearing at Sites 1X06 and 1X08.
3. Work associated with Segment 3 included access road maintenance between Redlands Boulevard and Live Oak Canyon Road. BMPs installation occurred and grading activities were conducted at Sites 3X37, 3X39, and 3X41.
4. Work associated with Segment 4 included tower assembly at Site 4N57 and grading at Site 4N64. Foundation drilling and pouring occurred at Site 4N63 and 4N64.
5. To date, work activities on Segment 2 have not commenced.

Environmental Compliance

1. There was one SCE self-reported and no CPUC reported incidents documented for construction activities associated with NTP #4 throughout the monitoring period. On September 11, the CPUC EMs noted a small dozer (bobcat) idling for approximately 20 minutes at Site 4N61 (see Figure 5). SCE documented this as a Level 1 incident.
2. Documentation of FAA Determinations for Segment 4 was provided on September 17. Additional information including the notification and determination forms has been requested.
3. There were no SWPPP maintenance items and no corrective actions associated with NTP #4 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #4.
4. There were no reportable (> 1 gallon) or non-reportable (<1 gallon) spills associated with NTP #4 identified during the monitoring period.
5. The 2018 nesting season has ended. If required, removal of inactive non-special-status bird species' nests is being implemented per the requirements of the NBMP. There were no such nests removed from work areas associated with NTP #4 recorded during the monitoring period.
6. No special-status species observations were reported at locations associated with NTP #4 during the monitoring period.

Transmission Work BLM Lands (NTP #5)

NTP #5 includes the portion of one transmission line segment, identified as Segment 6, which traverses properties managed by the Bureau of Land Management (BLM). NTP #5 was approved by BLM on March 29, 2018. To date, no work authorized by NTP #5 has been requested or has occurred.

Temporary Extra Workspaces (TEWS) and Minor Project Refinements (MPRs)

Table 2 summarizes the TEWS and MPRs for the WOD Upgrade Project to date.

Table 2 - TEWS & MPRs
(Updated 09/20/18)

TEWS / MPC	Date Requested	Date Issued	Phase	Description
Temporary Extra Workspaces (TEWS)				
TEWS #1	10-12-17	10-19-17	Maraschino Connection	Access to Beaumont Cherry Valley District water hydrant meter located near the intersection of Highland Springs Avenue and Crooked Creek, Beaumont.
TEWS #2	11-13-17	11-21-17	El Casco–Banning Connection	Water source on Oak Valley Boulevard.
TEWS #3	12-15-17	12-15-17	Banning Connection	Access to existing poles off of Lincoln Street.
TEWS #4	12-18-17	12-18-17	Banning Connection	Access to existing poles off of Wesley Street.
TEWS #5	12-20-17	12-21-17	Banning Connection	Access to existing poles at intersection of Wesley Street and Old Idyllwild Road
TEWS #6	6-13-18	6-13-18	Timoteo Relocation	Extra workspace to facilitate erection of TSP #4696058 at intersection of Redlands Boulevard and Bryn Mawr Street
TEWS #7	7-27-18	7-30-18	Timoteo Relocation	Extra workspace to facilitate wire pulling activities along Research Drive and Almond Avenue
Minor Project Refinements (MPRs)				
MPR #1	11-17-17	11-22-17	Maraschino Connection	Revisions to the amount of new underground telecom construction.
MPR #2	12-13-17	12-15-17	Maraschino Connection	Addition of two vault work areas on Highland Springs Road.
MPR #3	12-21-17	12-28-17	El Casco–Banning Connection	Adjustments to alignment along Oak Valley Parkway
MPR #4	12-27-17	1-3-18	Maraschino/El Casco–Banning Connections	Continued use of two fire hydrants previously approved as TEWS #1 and TEWS #2
MPR #5	1-16-18	1-22-18	Banning Connection	Continued use of access routes described in TEWS #3, 4, and 5 and temporary access paths through private property along Coyote Trail
MPR #6	2-8-18	2-12-18	Project-wide	Use of 10 water sources to support construction activities

TEWS / MPC	Date Requested	Date Issued	Phase	Description
MPR #7	2-23-18	2-28-18	Poultry MY	Temporary water and electrical supply to yard
MPR #8	2-27-18	3-2-18	El Casco Connection/ Segment 1	New telecom splice location and single new steel pole installation
MPR #9	3-26-18	3-27-18	El Casco Connection	Telecom work areas along El Casco Substation access road
MPR #10	4-6-18	4-9-18	Mountain View #1 MY/All subtrans	Additional work spaces at Mountain View #1 MY entry and at subtransmission improvements work areas
MPR #11	5-4-18	5-8-18	Tennessee Relocation	Relocation of 5 subtransmission structures from the east side to the west side of Nevada Street
MPR #12	5-14-18	5-16-18	Timoteo Relocation	Additional work space for TSP erection at Bryn Mawr Avenue and Interstate 10.
MPR #13	5-23-18	5-25-18	Project-wide	Addition of encased fire hose to O'Grady Court water source and use of 17 water sources to support construction activities
MPR #14	5-24-18	5-31-18	Timoteo/ Tennessee Relocations	Location shift of 3 TSPs and 1 vault location
MPR #15	5-31-18	6-4-18	Poultry MY	Paving of access road and trailer complex area
MPR #16	6-11-18	6-13-18	Banning Connection	Shift of horizontal directional drilling (HDD) alignment through Smith Creek and addition of walking paths along Coyote Trail
MPR #17	6-20-18	6-22-18	Dental Circuit/ Tennessee Relocation	Additional work space along Mission Road, Lugonia Avenue, and Nevada Street
MPR #18	8-3-18	8-7-18	Timoteo Relocation/ Beaumont #2 MY	Expansion of vault installation work area off Mountain View Avenue and new water source near Beaumont #2 MY
MPR #19	8-13-18	8-20-18	Segment 4	Additional work space requests at Sites 4N58, 4N59, and 4N64
MPR #20	8-21-18	8-27-18	Banning Connection	Use of unpaved access road west of Smith Creek

CPUC Compliance Incidents, Project Memoranda (PMs) and Non-Compliance Reports (NCRs)

Table 3 summarizes the CPUC Incidents, PMs, and NCRs issued to date.

Table 3
CPUC Incidents, Project Memoranda, and Non-Compliance Reports
 (Updated 09/20/18)

Incident/ PM/NCR	Regulatory Requirement	Date Issued	Phase	Description
Level 1 Incident	Traffic Control Plan	01-30-18	Banning Connection	Traffic control was set up in such a way that diverted flow into active work area and deviated from approved Traffic Control Plan.
Level 1 Incident	MM WIL-1b	04-19-18	Timoteo/ Tennessee Relocation	A portable water tank was observed uncovered for four consecutive days.
Level 1 Incident	MM VEG-1a	5-24-18	El Casco Substation	Equipment was staged outside of approved disturbance limits for at least 1-2 days.
Level 1 Incident	MM AQ-1a	8-15-18	Banning Connection	Fugitive dust observed from construction activities.
Level 1 Incident	MM WIL-1b	8-15-18	Banning Connection	Use of unapproved access road.
Level 1 Incident	MM WIL-1b	8-15-18	Banning Connection	Use of unapproved staging area.
Level 1 Incident	MPR #16	8-15-18	Banning Connection	SWRCB approved HDD Plan not provided prior to HDD activities.

PROJECT PHOTOGRAPHS



Photo 1 – Equipment located at the Match MY was missing documentation of compliance with air quality measures. (September 12, 2018).



Photo 2 – Uncovered 2-inch pipe at Beaumont 2 MY (September 12, 2018).



Photo 3 – Concrete wash residue at Beaumont 2 MY (September 12, 2018).



Photo 4 – Equipment staged on dry vegetation along Mission Road (September 11, 2018).



Photo 5 – Bobcat idling for more than 5 minutes conflicting with air quality emissions rules at Site 4N61 (September 12, 2018).