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PROJECT MEMORANDUM
SCE WEST OF DEVERS UPGRADE PROJECT

Date: October 1, 2018
To: Billie Blanchard, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Subject: Monitoring Report #33: September 17 to 23, 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 Lead EM Jenny Slaughter was onsite September 17 through 21, 2018.

CPUC Notices to Proceed (NTPs)

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

Table 1 - NTPs
(Updated 10/01/18)

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. SCE recorded this as a Level 1 incident.
2. At the Beaumont 2 MY, uncovered 2-inch diameter pipe was observed. 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. SCE was notified of the spill.
3. 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.
4. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #1 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 Project Nesting Bird Management Plan

(NBMP). There were no such nests removed from work areas associated with NTP #1 recorded during the monitoring period.

6. 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 control cable into positions one and two north of the MEER Building.
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. 2920 of 7430 LF of 12 kV duct-bank has been installed. 10 of 12 kV vaults have been set and 19 of 19 12 kV poles have been framed.
3. Work associated with the Timoteo Relocation subtransmission improvements included trenching on Redlands and Bryn Mawr Boulevards, sidewalk restoration, and splicing in vaults
4. Work associated with the Tennessee Relocation subtransmission improvements included grinding and capping trench lines on Iowa Street and San Bernardino Avenue. Final inspection of vaults took place.
5. For the overhead subtransmission work, 111 of 115 66 kV lightweight steel poles have been set. 19 of 19 TSP foundations and 17 of 19 TSP structures have been completed. Wire install - 18,583 of 27,140 circuit feet completed to date. Overhead work has been on hold, but is scheduled to start up October 8 given resolution of land acquisition issues.

6. Construction activities associated with the El Casco Connection including installing cross arms on existing poles along San Timoteo Canyon Road occurred throughout the monitoring period.
7. No construction activities associated with the Banning Connection place during the subject period.
8. No construction activities associated with the Juanita Reconductor occurred throughout the monitoring period.
9. No construction activities associated with the Timoteo-Tennessee Removal occurred throughout the monitoring period.
10. No construction activities associated with the San Bernardino Connection occurred throughout the monitoring period.
11. No construction activities associated with the Timoteo-Redlands Connection occurred throughout the monitoring period.
12. Work associated with the Maraschino Connection telecommunications improvements has been completed.
13. Work associated with the El Casco–Banning Connection telecommunications improvements has been completed.

Environmental Compliance

1. There was one SCE self-reported incident documented for construction activities associated with NTP #3 throughout the monitoring period. During construction activities along Iowa Street, the paving work being conducted by All American Asphalt crews were not following the traffic plan. No further details were provided.
2. On September 18, while monitoring the grinding/paving work on Iowa Street, the CPUC EM observed a water truck from the paving operations watering Iowa Street over jurisdictional drainage (JD) ID #1038. No BMPs were in place, and this activity resulted in a discharge to the standing water in the drainage. The CPUC EM estimated less than 1-gallon of non-stormwater runoff entered the drainage. Once Project personnel were notified, BMPs were brought to the site (see Figures 1 and 2). Additionally, the water truck driver was advised to discontinue watering at this location.
3. On September 18, non-stormwater from a water truck supporting paving operations flowed approximately 1,000-feet from work area down Orange Avenue. No BMPs were in place along this block at the time (see Figures 3).
4. On September 18, the CPUC EM reported fugitive dust leaving the site at a road shoulder staging area along Iowa Street from vehicles supporting the paving operations. It was also observed that no work limits delineators were installed to contain crews and equipment into approved work areas.
5. On September 20, an unanticipated cultural find occurred along Mission Avenue. A Final Incident Report was provided on September 21. The report indicates that the find would be reported as a non-significant find and that work could continue.
6. 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.
7. One SWPPP maintenance item associated with NTP #3 was recorded during the monitoring period (referring to item #2 above). To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #3.

8. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #3 identified during the monitoring period.
9. 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.
10. 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 Segment 5 were submitted on September 13, 2018, and authorization to start construction was issued by CPUC on September 26. Pre-construction compliance materials for Segments 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. No construction activities associated with Segment 1 other than BMP inspection took place during the subject period.
3. Work associated with Segment 3 included access road maintenance between Redlands Boulevard and Site 3X42. Site grading and export of soils took place between Sites 3X36 and 3X41. Excess spoils were spread along access roads between the two sites. BMPs installation and vegetation removal occurred at Sites 3N06 and 3S06.
4. Work associated with Segment 4 included tower assembly at Sites 4N57, 4N59, 4N60, 4N61, and 4N62, and at Shoofly structures 409, 411, and 417 (see Figure 4). Foundation drilling and pouring occurred at Sites 4N63, 4N64, 4N58 and at Shoofly locations 409-420. Mowing occurred at Wire Sites.
5. For the period covered by the previous Monitoring Report #32, Power Grade completed the following: Access Road – 4.1 miles of road were maintained in Segment 3, BMP installation – 8 sites (7 in Segment 3 and 1 in Segment 4), Clearing – Segment 1 (2 sites) and Segment 3 (3 sites), Site Grading – Segment 1 (2 sites) and Segment 3 (5 sites).
6. Transmission line totals: Grading crews have completed 71 sites for foundation installation in Segments 1, 3, and 4. Foundation installation continued in Segment 4 – crews have completed 13.5 of 386 lattice tower foundations. Lattice tower installation continued in Segment 4. Crews have completed 1 of 386 lattice towers to date. A second crew started last week and began shoo-fly structure installation — crews have completed installation of 6 of 51 220 kV lightweight steel poles and the bases for 6 of 58 tubular steel poles. Move 2 (first outage) is on track to begin October 1, 2018; final CAISO approval issued for outage.
7. To date, work activities on Segments 2 and 5 have not commenced.

Environmental Compliance

1. On September 11, the CPUC EMs noted a small dozer (bobcat) idling for approximately 20 minutes at Site 4N61. SCE documented this as a Level 1 incident during the subject reporting period. Four CPUC reported incidents were documented for construction activities associated with NTP #4 throughout the monitoring period.
2. On September 18, the CPUC EM arrived at Site 4N57 and SF414 at 3:42 and observed a water truck leaving the right-of-way approximately 5 minutes before. The water truck did not return until 4:25 and during this time, work at both locations continued to occur. There was no water buffalo on site for either operation (see Figure 5). Both work sites were left without adequate water supply. The approved Fire Management Plan states, "The contractor shall furnish a water truck or trailer (water buffalo). The truck may serve a dual purpose. The truck may be used to spray water on roads and work areas to suppress dust per Stormwater Pollution Prevention Plan requirements. However, the main purpose shall be to assist in fire prevention and firefighting activities. The truck shall never have less than 300 gallons of water aboard, even when in route to refill. If a water trailer (water buffalo) is provided, it shall be located and staged in the immediate work area; or if a water truck is provided, it shall be located on or adjacent (within one tower span) to the project work area. At no time shall a work site be without an adequate water supply." The Plan states that "Water trucks and trailers shall meet the following specifications: Contain at least 300 gallons of water." This incident was documented as a Level 1 Incident by the CPUC EM and provided to SCE.
3. After the incident above, the CPUC EM conducted an inspection of the water truck that arrived to Sites 4N57 and SF414. The water truck did not contain the proper hose as required in the approved Fire Management Plan. The Plan states that "Water trucks and trailers shall meet the following specifications: a combination straight stream-fog nozzle with 300 feet of 1-inch fire hose." Instead, the truck only had approximately 40-feet of hose (see Figure 6). This incident was documented as a Level 1 Incident by the CPUC EM and provided to SCE.
4. On September 18, the CPUC EM noted that construction activities were occurring at Site 4N64 also without a water buffalo or water truck. See Compliance Item #2 above for approved Fire Management Plan requirements. This incident was documented as a Level 1 Incident by the CPUC EM and provided to SCE.
5. On September 18, the CPUC EM noted several 4-inch rocks tracked onto San Timoteo Canyon Road that had been kicked onto the road from the stabilized entrance (rocks and shaker plate) placed by construction crews at the access road to Site 3X33 (see Figure 7). Further, smaller rocks were observed in the roadway outside of the entrance to the Poultry Yard. SCE was immediately notified and the materials were removed from the busy road. SCE reported that a non-project crew had been using the entrance to Site 3X33 kicking the rocks into the road and that the stabilized entrance would either be removed or maintained by the Project.
6. On September 20, the CPUC EM observed a foundation crew working at Site 4N58 observed a foundation assembly crew working without the required water supply for fire abatement. The assembly crew was operating equipment including a bobcat and a forklift. No water trailer was at the site and no water truck was staged within one tower span. A water truck was not observed anywhere on the right-of-way between Palmer Ave and San Timoteo Roads. See Compliance Item #2 above for approved Fire Management Plan requirements. This incident was documented as a Level 1 Incident by the CPUC EM and provided to SCE.
7. On September 20, the CPUC EM observed that BMPs present at Site 4N64 were encased in mono-filament. The location of the BMPs was immediately outside of a jurisdictional drainage covered by CDFW waters permit (LSAA). Condition of the LSAA permit states: "Permittee shall prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material." SCE was notified.

8. On September 17, a reportable spill of over 1 gallon occurred at Site 4N64. Approximately 2-gallons of water mixed with drilling polymer was released from the Baker tank used to support foundation drilling. According to SCE, the material was removed.
9. Documentation of FAA Determinations for Segment 4 was provided on September 17. Additional information was provided on September 26.
10. One SWPPP maintenance items associated with NTP #4 was recorded during the monitoring period (see item #8 above). To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #4.
11. There were no reportable (> 1 gallon) or non-reportable (<1 gallon) spills associated with NTP #4 identified during the monitoring period.
12. 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.
13. 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 10/01/18)

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 / MPC	Date Requested	Date Issued	Phase	Description
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/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
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

TEWS / MPC	Date Requested	Date Issued	Phase	Description
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 10/01/18)

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 – Non-stormwater discharge into JD along Iowa Street from overwatering the road by subtransmission crews. No BMPs were present at the time. (September 18, 2018).



Photo 2 – Non-stormwater discharge into JD along Iowa Street from overwatering the road by subtransmission crews. No BMPs were present at the time. (September 18, 2018).



Photo 3 – Non-stormwater discharge flowing approximately 1000-feet down Orange Avenue. No BMPs were present (September 18, 2018).



Photo 4 – Tower assembly at 4N57 (September 18, 2018).



Photo 5 – Foundation drilling at Shoofly location 414. No water for fire suppression or dust abatement was on site (September 18, 2018).



Photo 6 – Insufficient hose on water truck near Palmer Avenue. Per the approved Fire Management Plan, 300-feet of 1-inch hose is required (September 18, 2018).



Photo 7 – 4-inch rock tracked onto San Timoteo Canyon Road from a stabilized entrance to Site 3X33 (September 20, 2018). The track out was attributed to another utility working on an unrelated project, but the BMP was installed by the West of Devers Project and will be maintained or removed.