

# FINAL MONITORING REPORT

## SCE WOD Transmission Line Upgrade Project

*Prepared for*

**California Public  
Utilities Commission**

*Submitted by*



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## ATTACHMENTS

- Attachment 1 Project Overview and Study Area
- Attachment 2 CNDDDB Figures
- Attachment 3 Photo Log

# 1. INTRODUCTION AND PROJECT OVERVIEW

This Final Construction Completion Report has been prepared to summarize the construction and monitoring activities conducted for the Southern California Edison (SCE) West of Devers (WOD) Upgrade Project. The WOD Upgrade Project involved the upgrade of the existing 220 kV transmission system in Riverside and San Bernardino counties, including substation, distribution, and telecommunication improvements (see Attachment 1). The California Public Utilities Commission (CPUC), as the project Lead Agency under the California Environmental Quality Act (CEQA), conducted the environmental review process and granted final approval of the Project. The CPUC voted on August 18, 2016 to approve SCE's WOD Upgrade Project (Decision D.16.08.017) and certify the Final Environmental Impact Report (EIR), and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2014051041). The EIR was prepared by Aspen Environmental Group under contract to the CPUC in accordance with CEQA to inform the public and to meet the needs of local, State, and federal permitting agencies in considering the project proposed by SCE. Aspen prepared a separate Environmental Impact Statement (EIS) in accordance with the National Environmental Protection Act (NEPA) for the Bureau of Land Management (BLM) and BLM approved the project with its Record of Decision on December 27, 2016.

In October 2017, a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) was developed collectively between the CPUC, BLM, Aspen, and SCE. The MMCRP provided guidelines and procedures for environmental compliance on the Project. The MMCRP was updated several times over the duration of construction to respond to changing Project processes and to make any identified clarifications. Aspen Environmental Group implemented the MMCRP to ensure compliance with the Project mitigation measures, compliance plans, and permit conditions during all phases of construction. This Final Report summarizes the implementation of the MMCRP for the WOD Upgrade Project, as follows:

- **Section 1, Introduction and Project Overview**, provides a brief overview of the WOD Upgrade Project and project approvals granted by the CPUC, BLM, and other agencies. In addition, Section 1 outlines the role and responsibility undertaken by Aspen Environmental Group as the mitigation monitoring team, including ancillary permit tracking, preparation of notices to proceed with construction, and review of any changes to the project description, mitigation implementation, and extra workspace requirements.
- **Section 2, Project Construction and Compliance**, provides an overview of construction and compliance activities for the WOD Upgrade Project, including preconstruction and post-construction compliance activities.

Construction of the WOD Upgrade Project took place from October 2017 through August 2021 with final energization on May 14, 2021, and habitat restoration installation completed in 2022.

## 1.1. Overview of the WOD Upgrade Project

SCE constructed and will operate and maintain the 220 kV system and related facilities known as the WOD Upgrade Project. The Project includes the following major components:

- Removal and upgrade of existing 220 kV transmission lines. Upgrades would occur on 30 miles of the Devers–El Casco line, 14 miles of the El Casco–San Bernardino line, 43 miles of the Devers–San Bernardino line, 45 miles of the Devers-Vista No. 1 and No. 2 lines, 3.5 miles of the Etiwanda–San Bernardino line, and 3.5 miles of the San Bernardino-Vista line.
- Upgrade substation equipment at Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations to accommodate increased power transfer on 220 kV lines.

- Upgrade Timoteo and Tennessee 66/12 kV substations to accommodate 66 kV subtransmission line relocations.
- Removal and relocation of 2 miles of two existing 66 kV subtransmission lines.
- Removal and relocation of 4 miles of existing 12 kV distribution lines.
- Installation of telecommunication lines and equipment for the protection, monitoring, and control of transmission lines and substation equipment.

The Project is located within the existing WOD right-of way corridor in incorporated and unincorporated areas of Riverside and San Bernardino Counties. The right-of-way passes through BLM lands, the reservation trust land of the Morongo Band of Mission Indians, and the cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, Palm Springs, Rancho Cucamonga, Redlands, San Bernardino, and Yucaipa.

## 1.2. Role of Aspen Monitoring Team

The Aspen Monitoring Team was composed of the Monitoring Manager (Vida Strong), EIR/EIS Project Manager (Susan Lee), Public Liaison (Fritts Golden), Lead Environmental Monitor (Jenny Slaughter), and Environmental Monitors (Jody Fessler, Rosina Goodman, Jamie Miner, and Brady Daniels).

Aspen's Monitoring Manager, Vida Strong, supervised Aspen's Environmental Monitors, determined the appropriate Monitor staffing based on construction activities, was responsible for the review and approval of preconstruction compliance materials, review and preparation of Notices to Proceed (NTPs) and Minor Project Revisions (MPRs) for CPUC consideration, Monitoring Report preparation, and CPUC web site updates. The Monitoring Manager also served as the main point of contact with the CPUC Project Manager (CPUC PM) for major compliance and safety matters.

Aspen's EIR/EIS Project Manager, Susan Lee, provided historical context on possible impacts identified in the EIR/EIS and the Public Liaison (Fritts Golden) worked with the Monitoring Team and CPUC PM regarding any public inquiries/complaints.

Aspen's CPUC Environmental Monitor team conducted spot-check to full time monitoring during construction based on the level of activity. Prior to and during construction, the Environmental Monitors (Jenny Slaughter and Jody Fessler) assisted the Aspen Monitoring Manager with the review and approval of preconstruction compliance materials, and review, field validations, and preparation of approval letters for NTP and MPR requests. The CPUC EMs stayed apprised of construction activities and schedule changes and monitored construction activities for compliance with approved project mitigation measures, Applicant-proposed measures (APMs), compliance plans, and permit conditions. The CPUC EMs documented compliance through monitoring logs and provided input for the Monitoring Reports. The CPUC EMs noted any issues or problems with implementation of mitigation/APM/permit conditions/plan implementation, notified the appropriate designated project members, and reported problems to the Aspen Monitoring Manager. As issues were identified, they were brought to the attention of the SCE field representatives to address appropriately.

The Monitoring Manager and Public Liaison participated in bi-weekly conference calls with SCE, CPUC, and BLM. The Monitoring Manager and EMs participated in bi-weekly conference calls with SCE and their contractor team, including environmental support.

## 1.3. Additional Permitting Activities

Numerous federal, State, and local permits and approvals were required for the Project as summarized in Table 1. Aspen tracked the necessary permitting requirements to ensure that all the applicable agency

permits and approvals had been issued prior to construction. Implementation of these permit/approval requirements is described further in Sections 2.1 and 2.3.

**Table 1. Permits Required for the West of Devers Upgrade Project**

<b>Agency</b>	<b>Jurisdiction</b>	<b>Requirements</b>
<b>Federal Agencies</b>		
U.S. Bureau of Land Management (BLM)	Construction on or in lands administered by the BLM	Amendment to Right-of-Way Grant / Record of Decision (ROD) / Notice to Proceed for transmission line Temporary Use Permit ROD as part of Integrated Weed Management Plan Pesticide Use Proposal
U.S. Bureau of Indian Affairs (BIA)	Tribal lands	Right-of-Way Grant/Easement
U.S. Fish and Wildlife Service (USFWS)	Protection of federal listed, threatened and endangered species	Consultation for Section 7 of the Endangered Species Act Habitat Conservation Plans – Riverside County
U.S. Environmental Protection Agency	Activities which result in any discharge of fill material into waters of the U.S. within tribal land	Section 401 Clean Water Act
U.S. Army Corps of Engineers (USACE), Los Angeles District	Activities which result in any discharge of fill material into waters of the U.S.	Section 404 Permit – streambed alteration/crossing
Federal Aviation Administration (FAA)	Air safety near San Bernardino International Airport and Banning Municipal Airport	Form 7460–1, Notice of Proposed Construction or Alteration; Permit and Notice to Airmen
Federal Communications Commission (FCC)	Licenses/permits related to FCC frequencies and paths	Telecommunications Permit (as required)
Federal Energy Regulatory Commission (FERC)	Ratemaking for transmission facilities	Ratemaking
<b>Tribal Land</b>		
Morongo Band of Mission Indians	Reservation lands	Consent to Right-of-Way Grant/Easement
<b>State or Regional Agencies</b>		
California Public Utilities Commission (CPUC)	Transmission, substation, generation projects 50 kV and above	Certificate of Public Convenience and Necessity
California Department of Fish and Wildlife (CDFW)	Protection of fish, wildlife, plant resources and habitats	Streambed Alteration Agreement, Section 1602 Permit (if required) Section 2081 ITP
Regional Water Quality Control Board (RWQCB) – Colorado River Office (Region 7) and Santa Ana Office (Region 8)	Protection of surface waters under the Clean Water Act	Clean Water Act Section 402, General Permit for Storm Water Discharges Associated with Construction Activities
State Water Resource Control Board (SWRCB)	Protection of surface waters under the Clean Water Act	Clean Water Act Section 401 certification
California State Lands Commission (CSLC)	State lands	Right-of-Way Easement

<b>Agency</b>	<b>Jurisdiction</b>	<b>Requirements</b>
California Department of Transportation (Caltrans) – District 8	California Streets and Highways Code 660 711.21 CCR 1411.1 1411.6	Overload Permit Road/Highway Encroachment/Crossing Permits for activity in San Bernardino and Riverside Counties
California Department of Water Resources (DWR)	Encroachment of water lines	For construction activities crossing water line in Segment 2
Metropolitan Water District (MWD) of Southern California	Encroachment of Colorado River Aqueduct	For construction activity crossing aqueduct in Segment 6
Department of Toxic Substances Control (DTSC)	Handling hazardous materials under Hazardous Waste Control Act of 1972	EPA Hazardous Waste Generator ID
State Historic Preservation Office (SHPO)	Any archaeological or paleontological work	Cultural Resources Use Permit, Field Use Authorization, or an ARPA Permit (if required) Consultation for Section 106 of the National Historic Preservation Act
California Air Resources Board (CARB)	Portable emissions sources	Portable Engine Registration for specified non-mobile portable engines.
South Coast Air Quality Management District (SCAQMD)	South Coast Air Basin and Coachella Valley	Fugitive Dust Control Plan
<b>Local Agencies</b>		
Riverside County	County roads and highways, flood control/drainage channels	Road/Highway Encroachment/Crossing Permit Flood Control/Drainage Channel Encroachment/Crossing Permit
San Bernardino County	County roads and highways, flood control/drainage channels	Road/Highway Encroachment/Crossing Permit Flood Control/Drainage Channel Encroachment/Crossing Permit
Western Riverside County Regional Conservation Authority	Western Riverside Multiple Species Habitat Conservation Plan (MSHCP)	Certificate of Inclusion
Coachella Valley Conservation Commission	Coachella Valley MSHCP	Certificate of Inclusion
Cities	City streets, sidewalks, flood control/drainage channels, lands	Road Encroachment/Crossing Permit Flood Control Channel Encroachment/Crossing Permit Temporary Use/Occupancy Permit, for material and storage yards Storm Water Pollution Prevention Plan
<b>Other Utilities</b>		
Kinder Morgan (El Paso) Natural Gas Pipeline	Activities in area of natural gas pipelines	Pipeline Encroachment/Crossing Permit
Questar Southern Trails Pipeline Company	Activities in area of natural gas pipelines	Pipeline Encroachment/Crossing Permit
Southern California Gas Company	Activities in area of natural gas pipelines	Pipeline Encroachment/Crossing Permit
BNSF Railroad	Activities in area of railroad	Encroachment/Crossing Permit Const. D

Agency	Jurisdiction	Requirements
		2738 and D 2739

## 1.4. Notices to Proceed (NTPs)

The WOD Upgrade Project included multiple components (material yards, substation, distribution, telecommunication, and transmission). Table 2 summarizes the NTPs requested by SCE and issued by CPUC and BLM for these various components of the Project. Multiple NTPs is a typical process for large-scale projects with multiple components. Since the Project had received State and federal lead agency approvals, this phased construction review process allowed SCE to proceed with individual project components where compliance with all applicable mitigation measures and conditions could be documented. A description of the preconstruction compliance activities associated with the NTPs is presented in Section 2.1.

**Table 2. NTPs**

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

In general, the NTP requests included the following:

- A description of the work.
- Detailed description of the location, including maps, photos, and/or other supporting documents.
- Verification that all mitigation measures, permit conditions or requirements, APMs, project parameters, or other project stipulations had been met, applied, or did not apply to the work covered by the NTP request.
- In a case where some outstanding requirements could not be met prior to issuance of the NTP, an outline of outstanding submittals and how they would be met prior to construction.
- Up-to-date resources surveys or a commitment to conduct surveys and submit results prior to construction.
- Cultural resource surveys or verification that no cultural resources would be significantly impacted.
- Copies of permits issued by other agencies, including requirements.
- Date of when construction was anticipated to begin and duration of work.

Aspen reviewed the NTP requests and the applicable pre-construction requirements to ensure that all the information required to process and approve the NTP was included (see Section 2.1). If additional information or clarification was needed, it was requested from SCE. Aspen prepared the recommended NTPs for CPUC review and issuance.



## 1.5. Minor Project Refinements (MPR)

The WOD Upgrade Project, like other large-scale projects with multiple components, resulted in the need for changes due to final project design and engineering, and the need for additional workspace or needs during construction. This is common for construction efforts of the scale of the Project and the MMCRP notes that a Minor Project Refinement (MPR) request would be required for these activities. As project changes were identified, SCE submitted MPR requests to Aspen/CPUC for review and approval. Aspen reviewed and field validated each request. The review included an assessment of whether the proposed activity would result in new impacts or increase in impact severity, and if the requested activity would clearly and strictly comply with the intent of the mitigation measure(s) or applicable laws or policy. MPRs were also reviewed for consistency with CEQA requirements, and it was confirmed that the requested activity was located within the geographic boundary of the project study area. Finally, the review included an assessment if the requested activity would trigger other permit requirements, and if so, if the appropriate agency has approved the change. Aspen prepared letters of recommendation for CPUC consideration that documented the thorough evaluation of all activities covered under each MPR. Table 3 includes the requested SCE MPRs for the WOD Upgrade Project that were approved by CPUC.

**Table 3. Approved MPRs**

MPR	Date		Phase	Description
	Requested	Date Issued		
#1	11-17-17	11-22-17	Maraschino Connection	Revisions to the amount of new underground telecom construction.
#2	12-13-17	12-15-17	Maraschino Connection	Addition of two vault work areas on Highland Springs Road.
#3	12-21-17	12-28-17	El Casco–Banning Connection	Adjustments to alignment along Oak Valley Parkway.
#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.
#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.
#6	2-8-18	2-12-18	Project-wide	Use of 10 water sources to support construction activities.
#7	2-23-18	2-28-18	Poultry MY	Temporary water and electrical supply to yard.
#8	2-27-18	3-2-18	El Casco Connection/Segment 1	New telecom splice location and single new steel pole installation.
#9	3-26-18	3-27-18	El Casco Connection	Telecom work areas along El Casco Substation access road.
#10	4-6-18	4-9-18	Mountain View #1 MY/All subtrans	Additional workspaces at Mountain View #1 MY entry and at subtransmission improvements work areas.
#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.
#12	5-14-18	5-16-18	Timoteo Relocation	Additional workspace for TSP erection at Bryn Mawr Avenue and Interstate 10.
#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	Date		Phase	Description
	Requested	Date Issued		
#14	5-24-18	5-31-18	Timoteo/Tennessee Relocations	Location shift of 3 TSPs and 1 vault location.
#15	5-31-18	6-4-18	Poultry MY	Paving of access road and trailer complex area.
#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.
#17	6-20-18	6-22-18	Dental Circuit/ Tennessee Relocation	Additional work space along Mission Road, Lugonia Avenue, and Nevada Street.
#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.
#19	8-13-18	8-20-18	Transmission, Segment 4	Additional workspace requests at Sites 4N58, 4N59, and 4N64.
#20	8-21-18	8-27-18	Banning Connection	Use of unpaved access road west of Smith Creek.
#21	10-4-18	10-10-18	Project-wide/ Segments 3&4	Use of 6 water sources, installation of water tank, use of access road, and expansion of WSS.
#22	11-19-18	11-20-18	Subtrans and Telecom	Pole replacement, switch replacement, and shift in underground telecom route.
#23	12-11-18	12-21-18	Transmission, Segment 3	Site 3N32 and Move 3 work areas.
#24	01-15-19	01-28-19	Transmission, Segment 1	Additional Wire Stringing Site in Segment 1.
#25	03-11-19	03-14-19	Transmission, Segment 3	Additional work area west of Supersite 3X55, Segment 3.
#26	04-02-19	04-04-19	Transmission, Segments 2 & 6	Use of Prado Lane access road (Segment 2) and two existing hydrants (Segment 6).
#27	04-30-18	05-01-19	Transmission, Segments 1, 2 & 3	Use of two existing hydrants (Segment 1), water tank (Segment 2), and helicopter work area (Segment 3).
#28	05-31-19	06-06-19	Transmission, Segments 1, 2 & 6	Extra workspace areas, including helicopter landing zones and access roads, on Segments 1, 2, and 6.
#29	06-27-19	07-03-19	Transmission, Segments 3, 4 & 6	Extra workspace areas for equipment/material staging, wire stringing, and telecom work, on Segments 3, 4, and 6.
#30	08-01-19	08-06-19	Subtrans and Telecom	Additional workspaces for Maraschino and Devers Telecom Cable Removals, Segments 4 and 6.
#31	10-02-19	08-08-19	Transmission, Segments 2 and 4	Extra workspace areas for wire stringing activities, and use of an access road to connect two approved access roads
#32	11-18-19	12-03-19	Transmission	Additional work areas for Segments 4 and 6 construction activities.
#33	01-08-20	01-09-20	Transmission	Installation of platform in existing tower to facilitate RTHA nest relocation.
#34	02-19-20	03-02-20	Transmission	Additional Move 8 work areas and access road to the Matich MY.
#35	04-14-20	04-15-20	Transmission	Additional Move 8 work areas on Segments 2, 4, and 6.

MPR	Date		Phase	Description
	Requested	Date Issued		
#36	05-06-20	05-08-20	Transmission	Additional guard structure work area on Segment 6.
#37	06-03-20	06-08-20	Transmission	Scour countermeasures and additional work areas on Segment 6.
#38	06-30-20	07-07-20	Transmission	Additional work areas for material and equipment staging, McCarthy drain installation, and erosion repairs, Segments 2, 3, and 4.
#39	07-21-20	07-23-20	Transmission	Additional work areas for wire stringing and wreck-out activities on Segment 3, 4, and 6.
#40	09-14-20	09-18-20	Transmission	Additional MAC drains on Segments 2 and 3, additional wire stringing work area at Construction Area 4S56, and a fire hydrant on Segment 2.
#41	10-14-20	10-16-20	Transmission	Additional Mac Drain at Construction Area 3X64 on Segment 3.
#42	11-11-20	11-12-20	Transmission	Additional work area for mobile guard structure west of Construction Area 3S03 on Segment 3.
#43	12-17-20	01-04-21	Transmission	McCarthy Drain replacements, retaining wall, and two permanent nest platforms on Segments 2, 3, and 4.
#44	02-16-21	2-17-21	Transmission	Additional temporary work area for material and equipment staging during wire wreck-out activities at Construction Area 3X51 on Segment 3.
#45	03-04-21	03-16-21	Transmission	Additional temporary work area for material and equipment staging during wire wreck-out activities on Segments 3, 4, and 6 and new and relocated McCarthy Drains on Segments 3 and 4.
#46	04-05-21	04-13-21	Transmission	Additional McCarthy Drains in Segment 3, additional temporary work areas for material and equipment staging during wire wreck-out activities on Segment 4, temporary work area for material and equipment staging during telecommunication work activities on Segment 4, and a request for an exemption from MM VR-3a on Segment 2.
#47	05-13-21	05-21-21	Transmission	Additional work area for rip rap in Segment 2, additional temporary work area for materials and equipment staging during wire wreck-out activities on Segment 4, and an exemption to MM VR-3a for the natural rock wall construction for hilfiker walls on Segments 2 and 3.
#48	05-28-21	06-04-21	Transmission	Expanded work area to accommodate the relocation of a retaining wall, Segment 2.
#49	06-22-21	07-07-21	Transmission	The transfer of rock, sand and gravel material for use by the Beaumont-Cherry Balley Recreation and Park District.
#50	08-19-21	08-25-21	Transmission	Expansion of temporary work space to McCarthy Drain work limit MWL-2-SE-2N12-1, to facilitate the installation of the McCarthy drain.
#51	08-03-21	10-22-21	Transmission	Request for exclusion from restoration requirements for provided Construction Areas in Segments 1 through 6.

MPR	Date		Phase	Description
	Requested	Date Issued		
#52	12-22-21	01-09-22	Transmission	Request for additional temporary and permanent impacts to repair erosion damage at Construction Areas 3N03, 3X35, and 4X34.
#53	02-03-22	02-08-22	Transmission	Request for additional work area to install slope stabilizing devices for erosion control at Construction Area 3S36 in Segment 3.
#54	03-16-22	03-22-22	Transmission	Request for additional work areas to conduct erosion repairs at five locations in Segments 3, 4, and 6.
#55	11-01-23	11-20-23	Transmission	Request to update habitat restoration success criteria in the HRRP and IWMP for the WOD Project.

## 1.6. Temporary Extra Work Space (TEWS) Requests

A Temporary Extra Work Space (TEWS) is defined as a preexisting work space (i.e., no site preparation is required) that was used by SCE and their contractors during construction for a period of up to 60 days, and that was not specifically identified and evaluated during the CEQA process. Any workspace needed for a period longer than 60 days required an MPR approval (see Section 1.5).

In order for a workspace to qualify for a TEWS, SCE had to demonstrate that:

- The TEWS was located in a disturbed (void of native vegetation) area with no sensitive resources or land uses onsite or adjacent to the proposed workspace such that they may be significantly impacted by the work,
- No ground-disturbing activities or site improvements would occur,
- SCE had permission of the applicable landowner (e.g., municipality or private) to use the work space, and
- Use of the TEWS would not result in any significant environmental impacts.

The CPUC EMs reviewed and field validated each TEWS request, including applicable resource information, in accordance with the above criteria. If the TEWS request met the criteria, the CPUC EM granted approval and tracked the 60-day time frame; for several TEWS approvals, subsequent MPR requests were provided to extend the timeframe. Table 4 includes the requested SCE TEWS for the WOD Upgrade Project that were approved by the CPUC EMs.

**Table 4. Approved MPRs**

TEWS	Date		Phase	Description
	Requested	Date Issued		
#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.
#2	11-13-17	11-21-17	El Casco–Banning Connection	Water source on Oak Valley Boulevard.
#3	12-15-17	12-15-17	Banning Connection	Access to existing poles off of Lincoln Street.
#4	12-18-17	12-18-17	Banning Connection	Access to existing poles off of Wesley Street.
#5	12-20-17	12-21-17	Banning Connection	Access to existing poles at intersection of Wesley Street and Old Idyllwild Road.

TEWS	Date		Phase	Description
	Requested	Date Issued		
#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.
#7	7-27-18	7-30-18	Timoteo Relocation	Extra workspace to facilitate wire pulling activities along Research Drive and Almond Avenue.
#8	8-27-18	8-28-18	Dental/Intern Circuits	DENIED AND RESCINDED – Extra workspace to facilitate construction along Mission Road.
#9	10-18-18	10-19-18	Timoteo Relocation	Extra workspace for walking path at Bryn Mawr and I-10.
#10	11-05-18	11-05-18	Timoteo Relocation	Extra workspace along Barton and Mountain View Roads for cutover operations.
#11	01-30-19	01-31-19	Timoteo Relocation	Extra workspace to facilitate the removal of fiber optic cable from overhead poles north along Mountain View Avenue and east along Redlands Boulevard.
#12	02-06-19	02-07-19	Timoteo Relocation	Extra workspace along Mountain View Avenue for subtransmission pole removal.
#13	02-26-19	02-26-19	Transmission, Segment 3	Temporary access road detour for vehicle and equipment travel to/from San Timoteo Canyon Road and Tower Site 3X41.
#14	05-13-19	05-14-19	Banning Connection	Extra workspace along the east side of south Alola Street, City of Banning.
#15	05-16-19	05-17-19	Transmission, Segment 1	HLZ and temporary staging area for construction vehicles, materials, and equipment.
#17	08-07-19	08-07-19	Transmission, Segment 6	Access road for guard pole installation near Construction Area 6S15.
#18	08 16 19	08 16 19	Segment 6	Helicopter landing zone and temporary staging area for construction vehicles, materials, and equipment.
#19	09 05 19	09 05 19	Segment 5	Mobile guard structure on an existing road to Construction Area SF501 for wire stringing activities.
#20	09 27 19	09 30 19	Segment 6	Mobile guard structure on existing access road to Construction Areas 6S20 and 6S21 for wire stringing activities.
#21	12-11-19	12-12-19	Etiwanda Substation	Extra workspace within the existing concrete switchrack trench inside the active substation.
#22	01-31-20	01-31-20	Segment 2	Extra workspace adjacent to Construction Area 2N35 for staging and operating a wire puller.
#23	03-11-20	03-12-20	Segment 6	Access road near 6N38 for guard structure.
#24	03-17-20	03-17-20	Segment 5	Extra workspace for staging wire stringing equipment.
#25	04-08-20	04-08-20	Segment 4	Extra workspace for guard structure near Construction Area 4X25.
#27	09-02-20	09-02-20	Segment 2	Water source on Grand Terrace Road.
#28	10-27-20	10-27-20	Segment 3	Temporary mobile guard structure locations between 3X25 and 3X27.
#29	11-22-20	11-23-20	Segment 3	Temporary mobile guard structure location near Construction Area 3X27.

TEWS	Date		Phase	Description
	Requested	Date Issued		
#30	12-07-20	12-07-20	Segment 3	Temporary mobile guard structure location near Construction Area 3X46.
#31	04-13-21	04-14-21	Segment 3	Temporary extra work space for telecom work off Oak Valley Parkway in Segment 3.
#32	04-19-21	04-20-21	Segment 6	Temporary mobile guard structure location on access road between 6N39 and 6N40 in Segment 6.
#33	04-28-21	04-28-21	Segment 5	Temporary mobile guard structure location on vacant land adjacent to Construction Area 5X29.
#34	04-28-21	04-28-21	Segment 6	Temporary mobile guard structure location on access road and vacant land in Segment 6.
#35	06-10-21	06-11-21	Segment 6	Temporary mobile guard structure location on access road and vacant land in Segment 6.
#36	06-16-21	06-17-21	Segment 5	Temporary mobile guard structure location on access road and developed land in Segment 5.
#37	07-12-21	07-12-21	Segment 4	Temporary mobile guard structure location on disturbed vacant land in Segment 4.

## 1.7. Compliance Monitoring

Compliance monitoring by the CPUC EMs was intended to chronicle and document SCE's compliance with project mitigation measures, applicant-proposed measures, compliance plans, and agency permit conditions. Compliance monitoring was implemented to minimize or eliminate potential significant impacts and to protect environmental resources. As defined by the MMCRP, Non-Compliance is defined as "any deviation from applicable mitigation measures, applicant-proposed measures and project parameters, permit conditions or requirements, and approved plans." As the CPUC EMs identified deviations or inadequacies with respect to construction compliance activities, verbal warnings were provided to SCE/contractor field representatives, as well as corrective actions. If adequate compliance corrections were not made, a Project Memorandum was an initial written warning of a non-compliance activity. A Non-Compliance Report documented chronic non-compliance activity or a blatant disregard for project mitigation measures, compliance plans, or permit conditions is demonstrated. The compliance record for the WOD Upgrade Project is discussed in Section 2.3.

## 1.8. Coordination and Communications

In field communications were conducted by the CPUC EMs with SCE/contractor field representatives in accordance with the MMCRP. Verbal warnings and written communications (emails and photographs) were utilized to notify SCE and its contractors of non-compliance activities. Field observations were logged by the CPUC EMs for every site visit. Monitoring Reports were prepared by the CPUC Monitoring Team and submitted to the CPUC, BLM, resource agencies, and SCE documenting compliance and construction progress.

The CPUC Project web site was regularly updated to reflect ongoing Project construction activities (<https://www.cpuc.ca.gov/environment/info/aspern/westofdevers/westofdevers.htm>). The MMCRP, NTP, MPRs, and Monitoring Reports were made available via the web site.

SCE also provided weekly reports documenting construction and compliance activities, as well as a 3 Week Look Ahead for upcoming construction activities. As noted in Section 1.2, calls were held between the monitoring team and SCE and their contractors to discuss construction and compliance activities.

## 2. CONSTRUCTION & COMPLIANCE

As presented in Section 1.0, the intent of the monitoring program was to ensure compliance with the Mitigation Measures (MM) and Applicant Proposed Measures (APMs) that were included in the EIR/EIS to reduce impacts to less than significant. In addition, the development of many compliance plans was required, as well as resource and local agency permitting, as described in Section 1.3. These MMs, APMs, permit conditions, and compliance plans had pre-construction, during construction, and post-construction requirements. This section presents these various phases of compliance, as well as construction activities as follows:

- Section 2.1. Pre-construction compliance activities,
- Section 2.2. Construction activities,
- Section 2.3. During construction compliance activities, and
- Section 2.4. Post-construction compliance activities.

### 2.1. Preconstruction Compliance

Preconstruction compliance activities included verification of required permits (see Section 1.3), review and approval of required compliance plans, preparation of additional studies (geotechnical, cathodic, etc.), and implementation of required surveys, public notifications, and other field efforts. This section describes these preconstruction compliance activities. As SCE requested CPUC/BLM authorization to begin construction, Aspen ensured that the preconstruction compliance requirements by Project component had been satisfied and provided recommendations to CPUC/BLM regarding the start of construction.

#### 2.1.1. Compliance Plans

Prior to construction, the following compliance plans were submitted to satisfy federal, State and local agency mitigation and permit requirements. As required by Project mitigation measures, these compliance plans were reviewed by Aspen on behalf of CPUC and/or BLM prior to the start of construction to ensure that appropriate environmental protection would take place. If required by mitigation, upon CPUC/BLM approval, the approved plans were distributed to applicable jurisdictions. These plans were also periodically updated in response to changing Project needs. Compliance with the plans during construction was monitored by CPUC EMs, including post-construction restoration.

- Burrowing Owl Management and Passive Relocation Plan (MM WIL-2g)
- Construction Notification Plan (MM LU-1a)
- Cultural Resources Management Plan (CRMP) (MM CL-1a)
- Exhaust Emissions Control Plan (APM AIR 1)
- Fire Management Plan (MM WF-1a, VEG-1b, VEG-2a)
- Fugitive Dust Emission Control Plan (MM AQ-1a)
- Habitat Mitigation and Monitoring Plan for Restoration of Waters of the U.S. and State (MM VEG-3a)
- Habitat Restoration and Revegetation Plan (MM VEG-1d)
- Hazardous Materials, Waste Management, and Soil Management Plan (MM HH-1a, HH-2a, HH-3a)
- Helicopter Use Plan (MM T-7a, N-1a/b, WIL-1b/c)
- Integrated Weed Management Plan (MM VEG-1d)
- Mining Operations Plan (MM MR-1a)
- Nesting Bird Management Plan (MM WIL 1c)
- Night Lighting Management Plan (MM VR-7a)
- Paleontological Resource Mitigation and Monitoring Plan (PRMMP) (MM PAL-1b)
- Pesticide Use Proposal (PUP) (BLM permitting)
- Raven Monitoring, Management, and Control Plan (MM WIL-2b)

- Project Design Plan (MM VR-4a, VR-8a)
- Special-Status Plant Salvage and Relocation Plan (MM VEG-4a)
- Special-Status Small Mammals Avoidance and Minimization Plan (MM WIL-2j)
- Surface Treatment Plan (MM VR-9a)
- Wildlife Handling Guidelines (MM WIL-1b)
- Wildlife Noise Monitoring Plan (MM WIL-2c)
- Worker Environmental Awareness Program (MM VEG-1b)

### 2.1.2. Field Efforts

Prior to the start of construction at any given location, SCE and their construction contractors were required to follow established construction practices, including the following. Many of these practices were also included as mitigation and/or permit requirements.

- **Identification of Underground Utilities.** SCE or their contractor, contacted Underground Service Alert to identify any underground utilities in the construction zones. If an underground utility were identified as being potentially affected by SCE's construction or operation procedures, SCE/contractor worked with the affected underground utility owner/operator to develop a method to mitigate conflicts.
- **Work Site Staking/Flagging (MMs VEG-1a, VEG-1c, WIL-1a, VR-2a).** Prior to any construction, or equipment or crew mobilization at each work site, resource and work areas were marked with staking or flagging to identify the limits of work. As required by the noted mitigation, established staked work areas were as small as possible in order to minimize biological and visual resource impacts. SCE provided CPUC/BLM final engineering GIS shapefiles depicting all temporary and permanent disturbance areas, as well as summary data on temporary and permanent disturbance for each vegetation or habitat type within each jurisdictional area. This staking/flagging was field validated by the CPUC Environmental Monitor (EM).
- **SWPPP BMPs.** Installation of storm water best management practices (BMPs) at worksites as required by the Project Storm Water Pollution Prevention Plan (SWPPP).
- **Worker Environmental Awareness Program (WEAP) (MMs VEG-1b, WIL-1b, CL-1c, PAL-1c).** A WEAP was prepared to educate on-site workers about the proposed Project's sensitive environmental issues (MM VEG 1b). Throughout the duration of construction, SCE/contractor was responsible for ensuring that all on-site project personnel receive the WEAP training prior to beginning work. SCE/contractor maintained a list of all personnel who completed the WEAP training. This list was made available to the CPUC EM upon request. To help construction crews and other personnel maintain awareness of environmental sensitivities and requirements, periodic, brief WEAP refresher presentations were held at morning tailboards.

### 2.1.3. Other Studies, Surveys & Notifications

Additional issue area specific preconstruction requirements are described below.

#### Agricultural Lands:

- **Establish Agreement with Agricultural Landowners (MM AG-3a).** SCE established agreements with landowners for the use of agriculturally utilized Prime Farmland, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE and in accordance with the existing easement language. The signed agreements were submitted to the CPUC for review and approval prior to the start of construction.



### Air Quality:

- **Off Road Emissions (APM AQ-1b).** APM AQ-1b required that off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards. Prior to the start of off-road construction, SCE submitted the Equipment Inventory Form which documented equipment to be used. The subject Form was updated throughout construction.

### Biological Resources:

- **Resume Review (MM VEG 1a, WIL-1a, WIL-2i, WIL-2j).** SCE submitted the resumes for the lead biologists, biological species specialists, and biological monitors, including but not limited to bat, nesting bird, and special-status species monitors, to CPUC and BLM for review and approval prior to the commencement of construction related surveys and monitoring. The intent of the resume review was to ensure to the satisfaction of the CPUC and BLM, that the biological field staff had the appropriate education and experience to accomplish the assigned biological resources tasks.
- **Biological Surveys.** Preconstruction surveys for special-status plants and wildlife were conducted consistent with MMs VEG 4a (special-status plants), WIL 1a (biological preconstruction surveys), WIL 1c (nesting birds), WIL 2a (desert tortoise), WIL-2f (golden eagle), WIL 2g (burrowing owl), WIL 2h (special-status terrestrial herpetofauna), WIL 2i (bats), WIL 2j (special-status small mammals), and WIL 2k (American badger, ringtail, and desert kit fox), and environmentally sensitive area (ESA) flagging was installed. The CPUC EMs field validated the preconstruction survey results, including required ESA flagging. SCE reported a total of 216 preconstruction surveys were conducted for the Project.
- **Protocol & Focused Surveys (MM WIL-2c, WIL-2d, WIL-2e).** Protocol riparian bird surveys (MM WIL-2c) were conducted annually in accordance with MM WIL-2C through 2020. Throughout construction, nesting least bell vireo (LBV) were identified near the El Casco Substation, near Construction Areas 3X25 and 3X36 on Segment 3, and between Construction Areas 4X37 and 4X38 on Segment 4. Since active breeding LBV territory/nests were confirmed within 500 feet of project construction sites, SCE implemented the Wildlife Noise Monitoring Plan and recorded nest outcomes in yearly Nesting Bird Summary Reports. Barnard notified the CPUC and Wildlife Agencies of its intentions that annual protocol surveys would be suspended starting in 2021. However, per MM-WIL-1a, clearance sweeps were conducted in support of restoration activities in riparian habitat. In addition, a LBVI-approved Biological Monitor was present to ensure impacts to biological resources, including LBVI, were minimized during restoration efforts within 500 feet of occupied LBVI habitat identified during the previous protocol surveys.

Focused protocol surveys for coastal California gnatcatcher (CAGN)(MM WIL-2e) were conducted in 2015, 2016, 2017, and 2018. This species was not identified on the project in that time period and suitable habitat had been progressively degraded. In 2019, CPUC approved a proposed modified approach in which focused nest location surveys in the form of preconstruction clearance surveys are conducted within 10 days prior to the start of construction in suitable habitat areas. In addition, pre-activity sweeps are conducted prior to the start of work each day. This approach, which is consistent with CM 18 from the BO and conditions of SCE's PSE agreement for the WR-MSHCP, was used again in 2020 and 2021.

Focused Stephens' kangaroo rat (SKR) surveys (MM WIL-2d) were conducted in 2015, 2016, 2017, and 2018. SKR surveys were negative, and no sign was detected during preconstruction surveys for the duration of construction of the Project.

- **Compensate for Permanent Habitat Loss (MM VEG-1e).** SCE compensated for permanent or long-term habitat loss through off-site habitat acquisition and management or through participation in an approved in-lieu fee compensatory mitigation bank. This compensation was accomplished through par-

participation in the WR-MSHCP and CV-MSHCP (within the respective MSHCP areas). Certificates of Inclusion (COIs) which confirm that the Project was consistent with the MSHCPs were issued by Coachella Valley Regional Commission and Western Riverside County Regional Conservation Authority in March and May 2017, respectively. Habitat compensation for all permanent or long-term habitat loss that was not compensated through participation in the WR-MSHCP or CV-MSHCP was accomplished by acquisition of mitigation land or conservation easements or by providing funding for specific land acquisition, endowment, restoration, and management actions. Separate Habitat Management Lands Acquisition Packages (HMLAPs) were prepared by SCE to meet the USFWS 20.22-acre compensatory offsite habitat requirement for coastal California gnatcatcher and CDFW requirement for 138 acres of habitat management land to offset impacts to desert tortoise. These HMLAPs were reviewed and approved by CPUC, BLM, USFWS, and CDFW in September 2018.

- **Tree Removal (MM VEG-5a).** SCE obtained permits from local jurisdictions for tree removal and other plant removal or harvest, in accordance with each applicable ordinance or policy, prior to removal or other impacts to regulated trees or other plants.
- **MSHCP Consistency (MM VEG-5b).** For applicable Segment 3, 4 and 5 lands, the WR-MSHCP COI was issued in March 2017 and for applicable Segment 5 lands the CV-MSHCP COI was issued in May 2017.
- **Raven Monitoring, Management, and Control Plan (MM WIL 2b).** Prior to construction, SCE contributed to the USFWS Regional Raven Management Program - a one-time payment of \$105 per acre of long-term or permanent project disturbance within the geographic range of desert tortoise (Segments 5 and 6).
- **Bird Collisions (MM WIL-3a).** The recommendations published by APLIC (2012, Reducing Avian Collisions with Power Lines: The State of the Art in 2012) were incorporated into the Project design.

#### **Cultural/Paleontological Resources:**

- **Cultural Surveys (MM CL-1a).** SCE performed preconstruction cultural resource surveys in areas not yet surveyed and established ESAs. The CPUC EMs field validated the required ESA flagging.
- **Paleontological Survey & Inventory (MM PAL-1a).** SCE performed preconstruction paleontological resource surveys in areas not yet surveyed and established ESAs. SCE also compiled an inventory of significant paleontological resources which was included in the PRMMP. The CPUC EMs field validated the required ESA flagging.
- **Resume Review (MM CL-1d, PAL-1d).** SCE submitted the resumes for the principal archaeologist and cultural and paleontological resource monitors, to CPUC and BLM for review and approval prior to the commencement of construction related surveys and monitoring. The intent of the resume review was to ensure to the satisfaction of the CPUC and BLM, that the cultural and paleontological resource field staff had the appropriate education and experience to accomplish the assigned resource tasks.

#### **Geology and Soils:**

- **Geotechnical Studies (MM G-1a, G-2a, G-5a).** SCE conducted geotechnical studies to evaluate faults, landslides and unstable slopes, and soil characteristics. Geotechnical constraints were incorporated into the final design of the Project.

**Land Use & Property Owner/Public Notification:**

- **Construction Notification Plan (MM LU-1a).** Implementation of the Construction Notification Plan included the following:
  - **Public Notice Mailer.** No less than 15 days prior to construction that would affect property access, public notice mailers were distributed. The notice identified construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks).
  - **Newspaper Advertisements.** Fifteen days prior to construction within a route segment, a newspaper advertisement was placed in local newspapers and bulletins of general circulation in the area. The advertisement stated when and where construction will occur and provided information on the public liaison person and hotline identified below. If construction was delayed, an additional round of newspaper ads was placed to discuss the status and schedule of construction.
  - **Public Venue Notices.** Thirty days prior to construction, notice of construction was posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., BLM field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE posted information regarding the closure and any related trail detour at applicable resource management offices and posted the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice was posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and provided information on alternative recreation areas that may be used during the closure of these facilities.
  - **Public Liaison Person and Toll-Free Information Hotline.** SCE provided a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person was included in notices distributed to the public (see above). SCE also established a toll-free telephone number for receiving questions or complaints during construction and developed procedures for responding to callers. Monthly Community Logs documenting the public inquires and SCE responses were submitted to CPUC.
- **Important Farmland (MM AG-3a).** Sixty days prior to the start of project construction, SCE coordinated with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that was currently being used for agricultural purposes and that was required for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. SCE provided signed agreements to the CPUC prior to the start of construction. 3.3 acres of Prime Farmland was impacted by the transmission line construction activities (1.8 acres in Segment 1 and 1.5 acres in Segment 2; see Section 2.2.4 below for location of segments). SCE also coordinated tree impacts with Segment 1 and 2 agricultural landowners prior to the start of construction.
- **Quarry Coordination (MM MR-1a).** Prior to construction in the quarry area, Segment 5, SCE coordinated with quarry operators and provide CPUC/BLM a copy of the plan to avoid or minimize interference with mining operations.
- **Recreation Coordination (MM R-1a).** At least 30 days prior to construction that would affect recreation areas, SCE coordinated construction activities and the project construction schedule with a representative of the specified recreation areas that could be affected by construction. Construction activities avoided heavy use periods and major holidays to the extent feasible.

- **Alternative Recreation Sites (MM R-1b).** SCE coordinated with the local parks and recreation departments regarding construction activities at the specified park and recreation, in order to identify alternative recreation sites that could be used by the public. SCE posted a public notice at recreation facilities to be closed or have limited access during construction consistent with the Construction Notification Plan.
- **Pacific Crest Trail Coordination (MM R-1c).** SCE coordinated with USFS to establish a temporary detour of the Pacific Crest Trail, Segment 6, including preparation of a public notice.

### Traffic/Transportation:

- **Construction Transportation Plan (MM T-1a).** SCE prepared Construction Transportation Plans (CTPs) describing timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. SCE submitted the CTPs to Caltrans and the affected local jurisdictions for review and approval prior to commencing with construction activities.
- **Traffic Control Plans (MM T-1b).** Prior to the start of construction and as part of the required traffic encroachment permits, SCE and their contractors submitted Traffic Control Plans (TCPs) to agencies with jurisdiction over the public roads that would be affected by overhead or underground construction. Copies of the TCPs were provided to the CPUC, Caltrans, the planning or traffic departments of the affected local jurisdictions, and all affected police departments, fire departments, and ambulance and paramedic services.
- **Public Transit Coordination (MM T-1d).** At least 30 days prior to construction, SCE coordinated with the local and regional agencies/organizations providing regular bus or transit service in the Project area to reduce potential interruption of these services.
- **Avoid Conflicts with Planned Transportation Improvements (MM T-3a).** SCE submitted construction plans to the local jurisdictions to identify planned transportation projects potentially affected by the Project to ensure that Project structures are placed to avoid conflict with any planned transportation projects, and to inform the jurisdictions of the timing and location of any trenching or boring that may affect road surfaces and the flow of traffic. No planned transportation projects were identified by the jurisdictions as being potentially affected by Project construction.
- **Roadway Use/Damage (MM T-4a).** Prior to construction, SCE conferred with agencies having jurisdiction over the roadways anticipated to be used by delivery vehicles and equipment. Prior to construction, SCE photographed/video recorded all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites) and roadways where the road surface could be damaged by project-related trenching or digging. These images were provided to the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable).
- **Public Parking (MM T-6a).** As required by the Construction Notification Plan (MM LU-1a), prior to construction activity on major roadways, SCE notified the public via local newspapers and onsite postings of the potential for public parking spaces to be temporarily eliminated (5 or more spaces) and identified where temporary parking spaces would be located. Project construction vehicles parked inside approved work areas.
- **Federal Aviation Administration (FAA) (MM T-8a).** SCE conducted an internal analysis to develop the list of transmission structures and conductor spans requiring FAA approval for installation of safety devices (lights/balls). SCE provided documentation of FAA filings for the Project on September 17 and September 26, 2018. Additional information was provided February 11, 2019. Because FAA determinations are processed individually and expire within an 18-month period, the FAA determinations were provided to the CPUC as they were issued by the FAA for construction. Copies of FAA's review and

approval were provided to CPUC and BLM at least 60 days prior to erection of structures or installation of conductors that would be in violation of FAA standards and requirements. Eighteen transmission structures required red lights to be installed and marker balls were required on seven conductor spans. SCE provided the CPUC/BLM confirmation that all required lighting and marker balls were installed per FAA requirements.

### Visual Resources:

- **Minimize In-Line Views of Retaining Walls and Land Scars (MM VR-4a).** In its final Project design, SCE incorporated design features that reduced the in-line visibility of all access and spur roads, retaining walls, and ground disturbance areas from sensitive viewing locations. These design features included alternative access and spur road routes, the use of “drive and crush” access, and redesign and placement of retaining walls.

### Utilities:

- **Non-Potable Water (MM UPS-1a).** MM UPS-1a required the use of non-potable water when feasible. All Water Districts/Agencies listed in the FEIR were contacted by SCE to determine the availability of non-potable water within each district. Only the City of Redlands provides non-potable water service within the Project area. At the time of construction, Beaumont-Cherry Valley Water District was in the process of developing a non-potable water system; however, the purple hydrants within their system only supplied water from their potable water system at that time. In an effort to use non-potable water on the Project, SCE identified one local non-potable water well and one non-potable hydrant for use on the Project. SCE and their contractor submitted to CPUC information regarding the availability of non-potable water and efforts made to obtain it for use during construction.
- **Cathodic Protection (MM UPS-2a).** Prior to commencing construction, SCE performed engineering studies to determine whether and what cathodic protection would be required on pipelines potentially affected. SCE coordinated with the utilities with pipelines located near the Project alignment regarding cathodic protection improvements.

### Water Resources:

- **Erosion Control (MM WR-2a).** SCE submitted to CPUC/BLM an Erosion Control Plan which was included as part of the Stormwater Pollution Prevention Plans (SWPPPs) (Santa Ana Basin Region 8 SWPPP, WDID No. 8 33C380383; Colorado River Basin SWPPP, WDID No 7 33C380384; and EPA Jurisdictional Area SWPPP for tribal lands). In addition, SCE submitted to the CPUC/BLM grading permits (Counties of Riverside and San Bernardino, applicable cities, and the Morongo Tribe) that defined the locations of the specific features listed in the Erosion Control Plan. Finally, SCE submitted to the CPUC/BLM evidence of possession of applicable required permits for soil-disturbing construction/demolition activities, including: USACE 404 Nation Wide Permit, CDFW 1602 Permit, RWQCB 401 Water Quality Certification (WQC), and EPA 401 WQC (tribal lands).
- **Erosion/Scour (MM WR-3a).** MM WR-3a required that SCE provide the determination of lateral erosion and scour potential, and documentation of corrective actions/engineering to the CPUC/BLM prior to the start of construction. SCE submitted a lateral erosion and scour report to CPUC on 12-14-17. The Project SWPPPs were implemented during construction (see above).
- **Maintain Existing Flow Patterns (APM HYDRO-1).** Project drainage improvements were designed to maintain the existing flow patterns as practicable.

## 2.2. Construction

Construction activities are described in this section by NTP.

### 2.2.1. NTP #1, Material Yards

Table 5 presents a summary of the 10 material yards approved under NTP #1 for the WOD Upgrade Project, as well as their use during construction (4 of the 10 yards were never used). The subject material yards were used as reporting locations for workers, vehicle and equipment parking, and material storage. Material yards used as contractor base of operations, included construction trailers for supervisory and clerical personnel. Each material yard required the extension of power, lighting for staging and security purposes, and telecommunications. Construction fence screening was installed for those yards that were visible from public/residential vantage points.

**Table 5. Materials Yards**

Site Location and Conditions			
Material Yard Location	Pre-Use Site Condition / Adjacent Land Uses	Use during Construction	Approximate Area (acres)
<b>Mountain View No. 1 Material Yard:</b> West of Mountain View Avenue and North of San Bernardino Avenue, Redlands	Disturbed, vacant (fenced) / Industrial, Residential	Subcontractor primary base of operations and material/equipment storage.	2.8
<b>Lugonia Material Yard:</b> South of Lugonia Avenue & West of Segment 1 Corridor, Redlands	Used as staging area for a pipeline project (fenced) / Commercial, Agricultural, Industrial, Utility Corridor	Not used.	3.9
<b>Grand Terrace Material Yard:</b> Northeast corner of Mt. Vernon Avenue and Canal Street, Grand Terrace	Vacant, disturbed SCE utility corridor / Commercial, Public Facilities, Residential	Show-up location for project construction crews.	4.4
<b>Poultry Material Yard:</b> Directly in front of MCM Poultry, San Timoteo Canyon Road, Redlands	Disturbed, vacant / Rural Mountainous, Rural Residential	Prime contractor primary base of operations and material/equipment storage. Helicopter operations.	13.0
<b>San Timoteo Material Yard:</b> 30595 San Timoteo Canyon Road, Redlands	Disturbed, vacant / Rural Mountainous, Rural Residential	Not used.	17.0
<b>Beaumont No. 1 Material Yard:</b> Northeast corner of South California Avenue & East Third Street, Beaumont	Used as a staging area for an electrical project (fenced, gravel) / Public Facilities	Not used.	3.9
<b>Beaumont No. 2 Material Yard:</b> 853 E. Third Street, East of Maple Avenue, Beaumont	Used as a staging area for an electrical project (fenced, gravel) / Public Facilities	Subcontractor primary base of operations and material/equipment storage.	5.0
<b>Matich Material Yard:</b> Southwest corner of E. Theodore Street & N. Hathaway Street, Banning	Disturbed, vacant (50% concrete) / Industrial, Residential	Tubular steel pole (TSP) storage and material/equipment storage. Helicopter operations.	21

<b>Site Location and Conditions</b>			
<b>Material Yard Location</b>	<b>Pre-Use Site Condition / Adjacent Land Uses</b>	<b>Use during Construction</b>	<b>Approximate Area (acres)</b>
<b>Hathaway No. 2 Material Yard:</b> Northeast side of East Williams Street and North Hathaway, Banning	Unimproved, ruderal / disturbed-developed Office, Residential	Not used	15.7
<b>Devers Material Yard:</b> East of SCE's Devers Substation	In use as staging area for an electrical project (fenced, gravel) / Public Facilities, Rural Desert	Material/equipment storage. Helicopter operations.	9.5
<b>Total Acreage</b>			<b>96.2</b>

Development and use of the materials yards were conducted by the prime Project contractor, Barnard, and their subcontractors. Intermittent material deliveries to the Devers Yard began September 2017. Yard preparation started in March 2018 (see Photo 1).

Materials stored at the construction material yards included, but not be limited to, construction equipment, portable sanitation facilities, steel bundles, steel/wood poles, conductor reels, OHGW or OPGW reels, hardware, insulators, cross arms, signage, consumables (such as fuel and filler compound), waste materials for salvaging, recycling, or disposal, and Best Management Practices (BMPs) materials (straw wattles, gravel, and silt fences). Normal maintenance and refueling of construction equipment were conducted at the material yards, including fuel and hydraulic fluid storage which was performed in accordance with the Stormwater Pollution Prevention Plan (SWPPP) and the Hazardous Materials, Waste Management, and Soil Management Plan. Helicopter operations were also conducted out of the Poultry, Devers, and Matich Material Yards.

As project construction activities completed, material yards were released from the project and their respective SWPPPs were closed out. The Mountain View and Beaumont No. 2 Material Yards were released from the Project in August 2021, The Poultry Yard was released from the Project in November 2021, the Devers Yard was released in December 2021, and the Matich Yard was released in August 2022.

### 2.2.2. NTP #2, Substation Upgrades

In support of construction of the new 220kV transmission line upgrade, improvements were required at the five existing substations presented in Table 6. With the exception of the Etiwanda Substation, substation improvements included upgrades to equipment within the existing 220-kilovolt (kV) switchrack positions to achieve higher capacity (see Photo 2). Etiwanda Substation work was limited to the replacement of protective relaying equipment inside of the existing MEER building. During the construction, import and export of soil and the import of concrete and related materials was required to construct the new equipment foundations for switchrack improvements. All substation improvement-related work was conducted within the existing substation walls or fence lines. No changes to existing substation access, parking, drainage patterns, or modifications to perimeter walls or fencing was required.

**Table 6. Substation Improvements**

<b>Substation Improvement Construction Location</b>	<b>Site Condition</b>	<b>Approximate Area (acres)</b>
<b>Etiwanda Substation:</b> Located north of Sixth Street and west of Etiwanda Avenue in the City of Rancho Cucamonga.	Existing 220/66/12-kV substation (fenced). Work at Etiwanda Substation is limited to the inside the MEER building.	14

<b>San Bernardino Substation:</b> Located north of San Bernardino Avenue and east of Mountain View Avenue in the City of Redlands.	Existing 220/66/12-kV substation (fenced). 220-kV switchrack upgrades.	27
<b>Vista Substation:</b> Located west of Interstate 215 and north of Newport Avenue in the City of Grand Terrace.	Existing 220/115/66-kV substation (fenced). 220-kV switchrack upgrades.	29
<b>El Casco Substation:</b> Located off San Timoteo Canyon Road, west of the City of Beaumont in Riverside County.	Existing 220/115/12-kV substation (fenced). 220-kV switchrack upgrades.	13
<b>Devers Substation:</b> Located north of I-10 and northwest of the City of Palm Springs in Riverside County.	Existing 500/220/115/12-kV substation (walled). 220-kV switchrack upgrades.	89
<b>Total Acreage</b>		<b>172</b>

Work under NTP #2 was managed by Circle Wood Services with construction support from TTR Substations, Cunningham-Davis, and SCE crews. Substation upgrades at San Bernardino Substation began on October 2, 2017, and substation upgrades at the subject substation continued intermittently throughout the duration of Project construction.

### 2.2.3. NTP #3, Distribution, Subtransmission, and Telecom

Distribution, subtransmission, and telecommunication improvements (see Photo 3) were required for the continued operation of SCE's power system during and after Project construction as summarized in Table 7. None of the NTP No. 3 components were located on BLM lands.

**Table 7. Distribution, Subtransmission & Telecommunication Improvements**

Improvement	Associated Construction Activities	Approximate Area (acres)
<b>DISTRIBUTION</b>		
Dental 12-kV Distribution Circuit	Major construction activities include approximately 7,050 feet of excavation trenching for the new underground system on the north side of Mission Road, east of Mountain View Avenue to California Street, and Barton Road, conduit and cable installation, backfill, finish paving, transition from underground to overhead on an existing distribution pole, reconnection to the existing Dental 12-kV circuit.	8.07
Reconductor on Juanita Street	Major construction activities include reconductor of approximately 1,520 feet of 3W 1/0 ACSR on Juanita Street from Mountain Avenue to Mayberry Street and installation of new overhead three-phase bank. Approximately four distribution pole replacements and 11 cross arm replacements (see Figures 8 and 10).  Approximately 260 feet of excavation, conduit installation, and cable installation, to an existing customer from the west end of the conductor arm replacement on Juanita Street, backfill, and finish paving.	1.83
Intern 12-kV Distribution Circuit Underbuild	Major construction activities include relocation of the Intern Distribution Circuit in the same new underground system (impacts accounted for above for the Dental 12-kV circuit and conduit and cable installation). Transition from underground to overhead via a distribution riser pole at Barton Road, approximately 1,360 feet of underbuild on existing subtransmission poles. Removal and replacement of one subtransmission structure.	1.29



<b>Improvement</b>	<b>Associated Construction Activities</b>	<b>Approximate Area (acres)</b>
<b>SUBTRANSMISSION</b>		
Removal of San Bernardino–Redlands–Timoteo and the San Bernardino–Redlands–Tennessee 66-kV Lines	Major construction activities include removal of approximately 4.2 miles of existing San Bernardino–Redlands–Timoteo and the San Bernardino–Redlands–Tennessee 66-kV subtransmission lines, and approximately nine double-circuit LSTs and 28 double-circuit wood poles.	14.54
Relocation of San Bernardino–Redlands–Timoteo 66 kV Lines	Major construction activities include installation of approximately 34 subtransmission LWS or wood poles, with associated guying, and approximately 13 TSPs; installation of approximately 4,000 circuit feet of 3,000-kcmil underground conductor, approximately 6 vaults (10 feet × 20 feet × 11 feet), and approximately 4,000 feet of new duct bank; installation of approximately 7,100 circuit feet of 954 SAC overhead conductor; and removal of 8 wood poles.	21.33
Relocation of San Bernardino–Redlands–Tennessee 66-kV Lines	Major construction activities include installation of approximately 80 subtransmission LWS or wood poles, with associated guying, and approximately 10 TSPs; installation of approximately 800 circuit feet of 3,000-kcmil underground conductor, approximately 4 vaults (10 feet × 20 feet × 11 feet) and approximately 800 feet of new duct bank; installation of approximately 18,000 circuit feet of 954 SAC overhead conductor; and removal of 38 wood poles.	8.35
<b>TELECOMMUNICATIONS</b>		
San Bernardino Substation Connection to Redlands Inland Empire District Office	Major construction activities include splicing and work with associated electrical instrumentation within the substation property; 1,750 feet of fiber optic cable installation in existing conduit and cable trench to an existing vault and riser pole located outside of San Bernardino Substation; 1,260 feet of fiber optic cable installation on existing subtransmission poles extending east to Marigold Avenue; installation of telecommunications facilities on newly relocated San Bernardino–Redlands–Timoteo 66 kV Subtransmission Line, including approximately 6,140 feet of fiber optic cable installation on new subtransmission structures in private and public ROWs; transition underground; installation of approximately 350 feet of new conduit and fiber optic cable to an existing pole on Redlands Boulevard; new fiber optic cable transition overhead via a telecommunications riser and connection to existing fiber optic cable.	0.51
Timoteo-Redlands District Office fiber optic cable connection	Major construction activities include splicing and work with associated electrical instrumentation within the substation; installation of approximately 420 feet of fiber optic cable overhead from an existing pole on the south side of Timoteo Substation crossing to the east side of Mountain View Avenue then extending 105 feet south to a new manhole; transition underground for approximately 1,000 feet south in existing conduit on Mountain View and 1,550 feet east on Mission Road to new vault; Cable removal from Timoteo Substation to the side of Mission Road at the SCE ROW.	1.01
El Casco Substation Connection to Vista-Moreno OPGW	Major construction activities include splicing and work with associated electrical instrumentation within the substation; installation of approximately 41,000 feet of fiber optic cable on existing poles along San Timoteo Canyon Road from pole 2210878E to existing riser pole 4380942E outside of El Casco Substation within a 15-foot work area buffer, transition underground in existing conduit for approximately 160 feet to an existing manhole; installation of approximately 1,380 feet of fiber optic cable in existing conduit and cable trench to the El Casco MEER building.	13.21

<b>Improvement</b>	<b>Associated Construction Activities</b>	<b>Approximate Area (acres)</b>
Maraschino Substation Connection to Devers-Valley OPGW	Major construction activities include splicing and work with associated electrical instrumentation within the substation; approximately 430 feet of fiber optic cable and new underground conduit installed from existing structure M24T1 to an existing distribution vault on Highland Springs Avenue, approximately 2,630 feet of fiber optic cable installed in existing conduit, followed by the installation of approximately 2,920 feet of fiber optic cable and new underground conduit installed north to underground vault V5528679. North of the vault, another 1,520 feet of fiber optic cable and new underground conduit will be installed to a new manhole on East First Street. From the manhole, another 9,230 feet of fiber optic cable and new underground conduit will be installed on East First Street to riser pole 4201995E, where the line transitions overhead for approximately 4,680 feet along East First Street and north on Veile Avenue on existing subtransmission poles to the northeast corner of the Maraschino Substation. Fiber optic cable transition underground for approximately 400 feet in an existing underground conduit and cable trench to the MEER building located in Maraschino Substation.	7.31
El Casco–Banning connection to Devers-Vista Skywrap (FEIR page B-17 Item #6)	Installation of approximately 840 feet of fiber optic cable will be installed on existing poles on Oak Valley Parkway, west of the existing splice location at Oak View Drive, to a distribution pole approximately 280 feet east of Golf Club drive. From this pole, approximately 3,300 feet of fiber optic cable and new conduit will be installed west, crossing under Interstate 10 to an existing distribution vault east of Desert Lawn Drive.	2.12
Banning Substation Connection to Devers-Valley OPGW (FEIR page B-16 Item #2)	Major construction activities include splicing and work with associated electrical instrumentation within the substation, installation of approximately 630 feet of fiber optic cable in a new underground conduit between Structure M21-T1 and existing distribution pole 256815S on Coyote Trail via directional bore, installation of approximately 4,120 feet of new fiber optic cable on existing distribution poles (combination of public and private lands), installation of approximately 480 feet of new fiber optic cable in new conduit under the existing Devers-Valley 500-kV ROW, installation of 6,700 feet of fiber optic cable overhead on existing poles on paved Old Idyllwild Road, Wesley Street, Durward Street, on SCE ROW, to East Lincoln Street, installation of 280 feet of fiber optic cable and new conduit to Banning Substation and approximately 170 feet of fiber optic cable trench inside the substation to reach the Banning Substation MEER building.	3.37
<b>Total Acreage</b>		<b>82.94</b>

Telecom work began early-December 2017. Telecom work under NTP #3 was conducted by W.A. Rasic Construction, Abercrombie Services, and SCE crews. Subtransmission and distribution work started in April and July 2018, respectively. Major subtransmission and distribution construction activities were performed primarily by Hot Line Construction with support from CJ Drilling, Barnard Construction, and SCE crews. Telecom and subtransmission work continued intermittently throughout the duration of Project construction. In summary, construction of the NTP #3 primary components included the following:

- For distribution components, 19 12 kV poles were framed, 12 12 kV underground vaults were installed, and 7,430 feet of 12 kV duct bank (conduit) and 10,760 feet of 12 kV conductor wire were installed.
- For subtransmission components, 119 66 kV light weight TSPs were erected, 19 TSPs were erected, and 25,610 feet of 66 kV wire was installed.

### 2.2.4. NTP #4, Transmission (non-BLM)

Approximately 181 circuit miles of existing 220-kV line facilities (approximately 48 corridor miles) was removed and upgraded primarily within the existing SCE transmission line corridor. The transmission line upgrades were constructed along the following six transmission line segments (see Figure 1):

- Segment 1—San Bernardino (Milepost [MP] SB 0 to MP SB 3.5);
- Segment 2—Colton, Grand Terrace, and Loma Linda (MP 0 to MP 5.2);
- Segment 3—San Timoteo Canyon (MP 5.2 to MP 15.2);
- Segment 4—Beaumont and Banning (MP 15.2 to MP 27.4);
- Segment 5—Morongo Tribal Lands and Surrounding Areas (MP 27.4 to MP 36.9);
- Segment 6—Whitewater and Devers (MP 36.9 to MP 45);

The Project was constructed on a combination of 220-kV double-circuit lattice steel towers (LSTs), double-circuit tubular steel poles (TSPs), and single-circuit TSPs. Each of the proposed 220-kV transmission lines consisted of overhead wires (conductors), which form three electrical phases. These conductors were supported by LSTs and/or TSPs and were electrically isolated from the structures by insulators. In addition to the conductors, structures, and insulators, the new transmission structures were equipped with overhead ground wires (OHGW) and/or optical fiber ground wires (OPGW) for shielding and/or telecommunication purposes. Table 8 provides a summation of 220 kV transmission line structure removals, installations, and modifications per Segment. Other ancillary construction features by Segment are summarized in Table 9. The following subsections describe construction of each Segment.

**Table 8. 220 kV Transmission Line Structure Removals, Installations, and Modifications per Segment**

Project Installation	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
New LSTs	42	18	86	99	62	79	386
Modified LSTs	1	1	2	3	—	—	7
Removed LSTs	44	26	118	97	67	63	415
Existing LSTs	—	24	2	3	—	—	29
New TSPs	4	9	16	12	36	6	83
Removed TSPs	—	—	—	—	5	—	5
Wood Pole Removals	—	—	—	63	65	54	182

**Table 9. 220-kV Transmission Line Construction Features per Segment**

Project Installation	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
Guard Structure Setup Locations	21	5	7	26	2	26	87
Wire/Splice Sites	9	7	21	42	29	15	123
Shoo-fly Work Areas	3	4	6	3	5	-	21
Shoo-fly Structures	37	15	10	28	1	18	109
Down-guy Anchors	14	20	4	26	1	13	78
Improved Access and Spur Roads (miles)	4.8	15	50.3	31.2	36.7	41.7	179.7
New Access and Spur Roads (miles)	2.1	1	2.6	3.3	4.5	2.5	16
Retaining Walls (feet)	-	955	1,096	332	-	192	2,575

Transmission line construction and related activities were conducted by the prime Project contractor, Barnard Construction, and their subcontractors including:

- Power Grade Incorporated conducted access road maintenance/stabilization, BMP installation, vegetation removal, and site grading.
- CJ/Aldridge Drilling performed foundation work.
- Abercrombie Services assembled and erected new towers and conducted wire operations with support from Summit and Wilson Helicopters.
- Cunningham Davis Corporation removed existing towers and foundations.
- Wilson Construction (added March 2020) helicopter wire removal activities.
- Ancillary telecommunication work approved under NTP #4 was performed by SCE crews.

Intermittent outages of the existing circuits were required to accomplish construction activities. The first required outages (Project Move 1 and Project Move 2) were completed in 2018. Project Moves 3 and 4 were completed in 2019. Move 5 in Segments 1, 2, 5, and 6 began on August 5, 2019, and was completed January 15, 2020. Move 6 in Segment 2 began on October 14, 2019 and was completed on February 14, 2020. Move 7 in Segment 1 began on February 24, 2020 and was completed on March 18, 2020. Move 8, in all segments except Segment 2, began on March 9, 2020, and was completed on August 4, 2020. Move 9 in Segments 3 and 6 began on August 8, 2020 and was completed on August 17, 2020. Move 10 in Segments 3, 4, and 5 began on August 24, 2020, and was completed on December 22, 2020. Move 11 in Segment 1 began on January 4, 2021 and was completed on January 20, 2021. Move 12 in Segment 1 began on January 21, 2021 and completed on February 12, 2021. Move 13 in Segments 2 through 4 began on February 13, 2021 and was completed on March 6, 2021. Move 14 in Segments 3, 4, and 6 began on March 8, 2021, and was completed on March 22, 2021. Move 15 began on March 15, 2021, in Segments 4 and 6 and was completed on April 11, 2021. All major construction activities were completed in August 2021. Energization of the entire Project occurred on May 14, 2021.

NTP #4 construction progress by year is presented in Table 10 and 220 kV construction activities by segment are presented below.

**Table 10. 220-kV Transmission Line Construction Progress by Year**

Activity	Project Installation Total	Cumulative Progress by Year				
		2018	2019	2020	2021	2022
Site Grading for foundation installation	483 sites	118	453	477	481	483
Foundations for lattice towers	386 foundations	57	296	385	386	386
Foundations for tubular steel poles (TSPs)	82 foundations	2	68	82	82	82
Erection of lattice towers	386 lattice towers	11	156	385	386	386
Erection of TSPs	82 TSPs	2	54	80	82	82
Erection temporary shoofly locations	76 locations	39	55	76	76	76
Stringing of shoofly conductor	6.3 circuit miles	1.4	3.7	6.09	6.3	6.3
Stringing of mainline conductor	184 circuit miles	2.1	54.5	180	184	184
Stringing of OPGW fiber	91 circuit miles	-	23	86.2	91	91
Demolition of existing structures	602 structures	11	147	384	602	602
Demolition of existing foundations	415 foundations	11	96	237	415	415
Wire wreck-out	184 circuit miles	1.3	34.7	125.93	184	184
McCarthy Drains	156 drains	-	-	107	155	156
Scour Countermeasures	35 sites	-	-	27	35	35

Activity	Project Installation Total	Cumulative Progress by Year				
		2018	2019	2020	2021	2022
Soldier pile retaining wall	9 walls	-	-	9	9	9
Hilfiker retaining wall	11 walls	-	-	10	11	11

On March 20, 2020, Governor Gavin Newsom issued a shelter in place order in response to the COVID-19 pandemic. Because the WOD Project was considered to be essential infrastructure as allowed under the shelter in place order, construction continued throughout the duration of the order with appropriate safety protocols in place.

#### **2.2.4.1. Segment 1—San Bernardino (Milepost [MP] SB 0 to MP SB 3.5)**

Major construction activities include the removal, installation, and modification of 220-kV LSTs and structures, 220-kV transmission line upgrades, and telecommunications upgrades within the existing right-of-way and San Bernardino Substation. Work occurred near an agricultural corridor and passed residences south of the I-10 crossing, adjacent to Mission Road, north of Beaumont Avenue, the San Timoteo Wash, and Beaumont Avenue. Ground disturbance was limited to developed areas within San Bernardino Substation, the SCE right-of-way, and access roads from the San Bernardino Junction and through the cities of Loma Linda and Redlands.

The preconstruction package for Segment 1 was received on July 6, 2018 and authorization to start construction was issued by CPUC on July 10, 2018. Construction of Segment 1 began the week of August 6-10, 2018 with BMP installation, and vegetation removal and site grading also began during the month (see Photo 4). Foundation activities (drilling and concrete pouring) work began in October 2018 and shoofly pole installation, tower wreck-out, and tower assembly began November 2018. Wire stringing began December 2018 and continued through January 2021 intermittently in accordance with the Project's outage driven move schedule. Construction activities in 2021 included wire, tower, and foundation wreck-out and site restoration. Construction activities completed in August 2021 with the removal and replacement of concrete drive entrances and public walkways within SCE's right-of-way.

#### **2.2.4.2. Segment 2—Colton, Grand Terrace, and Loma Linda (MP 0 to MP 5.2)**

Major construction activities included removal and installation of LSTs and structures, modifications to existing structures, 220-kV transmission line upgrades, and telecommunications upgrades in the hills south of Loma Linda, passing residences along Grand Terrace Road, east of I-215 and northwest of the connection into Vista Substation on Grand Terrace Road and across from the substation entrance on Newport Avenue. Ground disturbance was limited to developed areas within Vista Substation, the SCE right-of-way, and access roads from San Bernardino Junction, and through the cities of Colton, Grand Terrace, and Loma Linda.

The preconstruction package for Segment 2 was received on July 16, 2018 and authorization to start construction was issued by CPUC on July 18, 2018; however, work on a minor portion of Segment 2 was previously authorized as part of MPR #8 and was started the week of July 9-13, 2018. Construction of Segment 2 began the week of August 6-10, 2018 with BMP installation. Site and access road grading began December 2018 and retaining wall construction began January 2019. Foundation work (drilling and concrete pouring) began April 2019 (see Photo 5) and foundation wreck-out began August 2019. Tower assembly began in July 2019 and wire stringing activities began in August 2019 and continued through March 2021 intermittently in accordance with the Project's outage driven move schedule. Final site grading and some restoration activities began in November 2020 with hydroseed watering occurring as necessary throughout the duration of construction. Construction activities in 2021 included wire wreck-out activities, McCarthy drain installation, foundation wreck-out, and site restoration.

On July 11, 2019, during foundation excavations, the crew reached a depth of approximately 4-feet when the auger made contact with an unmarked portion of an 18-inch residential service water line. The crew had previously identified the USA Dig Alert markings and blue identification flags placed by the underground utility agency, which incorrectly identified the location of the underground waterline approximately 10-feet outside the radius of the planned drill hole. Once ruptured, the excavation overflowed onto the 2N30 work site, along an existing access road, and onto the south end of a paved shopping center parking lot. The construction crews contacted the water company to shut off the water, cleaned up the deposited sediment, and stabilized the site and access road (see Photo 6). The SWRCB and CDFW were notified of the discharge. The utility fixed the water line the same day.

#### **2.2.4.3. Segment 3—San Timoteo Canyon (MP 5.2 to MP 15.2)**

Major construction activities included access roads improvements, removal, installation, and modification of LSTs and structures, 220-kV transmission line upgrades, and telecommunication upgrades from the San Bernardino Junction (MP 5.2) to El Casco Substation (MP 15.2) roughly paralleling San Timoteo Canyon Road for much of its length where it crossed from San Bernardino County into Riverside County and looped into El Casco Substation and connected to the existing 220-kV switchrack. Ground disturbance was limited to the SCE right-of-way and access roads to San Bernardino Junction and San Timoteo Canyon to El Casco Substation.

The preconstruction package for Segment 3 was received on June 1, 2018 and authorization to start construction was issued by CPUC on June 12, 2018. Construction of Segment 3 began the week of June 18-22, 2018 with BMP installation. Stabilization of access road entrances, roadway maintenance, vegetation removal, and site and access road grading and improvements began in July 2018. Wire wreck-out activities, retaining wall construction, and foundation work (drilling and concrete pouring) began October 2018. Conductor and tower removal, tower assembly (see Photo 7), and wire stringing began January 2019 and continued through March 2021 intermittently in accordance with the Project's outage driven move schedule. Roadway grading/maintenance was conducted throughout the 2019, 2020, and 2021 rainy seasons to facilitate construction vehicle passage. Restoration grading and hydroseeding of completed sites began April 2019, and hydroseed watering was conducted as necessary throughout the duration of construction. Foundation wreck-out and tower shearing began in August 2019 and continued through August 2021. Final restoration and hydroseeding began in October 2021 and completed in December 2021.

#### **2.2.4.4. Segment 4—Beaumont and Banning (MP 15.2 to MP 27.4)**

Major construction activities included access roads improvements, the removal, installation, and modifications to existing structures and LSTs, 220-kV transmission line upgrades, and telecommunication upgrades from the El Casco Substation through unincorporated Riverside County and south Calimesa, crossing I-10 to the northeast into Beaumont, east to Oak Valley Parkway, to the north through open fields east through Banning, and open space in the hills north of Banning to San Gorgonio Avenue. Ground disturbance was limited to access roads to the SCE right-of-way to El Casco Substation and through Beaumont and Banning to San Gorgonio Avenue.

The preconstruction compliance package for Segment 4 was received May 1, 2018 and authorization to start construction was issued by CPUC on May 4, 2018. Construction of Segment 4 began the week of May 14-18, 2018 with stabilization of access road entrances at Palmer Avenue and San Timoteo Canyon Road, BMP installation, and vegetation removal. Site and access road grading and improvements began in July 2018, tower foundation work (drilling and concrete pouring) began August 2018, and tower assembly and erection, including shoofly structures, began September 2018. Wire wreck-out and demolition of existing towers/foundations began October 2018. Wire stringing of new towers, including helicopter operations, also began October 2018 and continued through April 2021 intermittently in accordance with the Project's outage driven move schedule. Roadway grading/maintenance was conducted throughout the 2019, 2020,

and 2021 rainy seasons to facilitate construction vehicle passage (see Photo 8). Restoration grading of completed work sites began December 2018, hydroseeding began in April 2019, and hydroseed watering was conducted as necessary throughout the duration of construction. Construction activities in 2021 included wire, tower, and foundation wreck-out, McCarthy drain installation, site restoration and hydroseeding.

#### **2.2.4.5. Segment 5—Morongo Tribal Lands and Surrounding Areas (MP 27.4 to MP 36.9)**

Major construction activities included access road improvements, the removal, installation, and modifications to structures, 220-kV transmission line upgrades, and telecommunication upgrades from San Gorgonio Avenue in the City of Banning across the Morongo Band of Mission Indians Reservation, crossing through the existing gravel mine, and the eastern limit of the Morongo Indian Reservation at Rushmore Avenue. Ground disturbance was limited to access roads to the SCE right-of-way from San Gorgonio Avenue in Banning and to Morongo Tribal Lands and Rushmore Avenue. The CPUC EMs did not monitor construction activities on Morongo lands, but construction progress was reported by SCE.

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, 2018. BMP installation started at various sites within Morongo lands the week of March 10-14, 2019. Vegetation clearing, including rock crushing, site and access road grading, foundation activities (drilling and concrete pouring), and tower assembly began April 2019. Roadway grading/maintenance was conducted throughout the 2019, 2020, and 2021 rainy seasons to facilitate construction vehicle passage. Tower wreck-out, wire removal, and wire stringing began August 2019 and continued through December 2020 intermittently in accordance with the Project's outage driven move schedule (see Photo 9). Restoration grading of completed work sites began in November 2020, and hydroseed watering was conducted as necessary throughout the duration of construction. Construction activities in 2021 included wire, tower, and foundation wreck-out, McCarthy drain installation, site restoration and hydroseeding.

On May 22, 2019, SCE received a Cease and Desist Letter from the Morongo Reservation to stop construction activities on tribal land. Construction crews removed all equipment from tribal lands and construction activities were on hold for all of Segment 5 through mid-June 2019. The issue was resolved by having the project archeologist and tribal monitors survey all reservation sites prior to ground-disturbing activities and having archaeological and tribal monitors present during all ground disturbing activities and tribal monitoring during all construction activities at construction sites in areas that were deemed sacred.

#### **2.2.4.6. Segment 6—Whitewater and Devers (MP 36.9 to MP 45), Non-BLM Lands**

Major construction activities included access road improvements, the removal, installation, and modifications to structures, 220-kV transmission line upgrades, and telecommunication upgrades from the eastern boundary of the Morongo Reservation at Rushmore Avenue to Devers Substation, along the foothills of the San Bernardino Mountains passing residences off Haugen-Lehmann Way, crossing Whitewater Canyon Road, and passing wind-generation projects and Highway 62 to connect to the existing 220-kV switchrack inside Devers Substation. Ground disturbance was limited to access roads to the SCE right-of-way from eastern boundary of the Morongo Reservation at Rushmore Avenue through Whitewater Canyon Road and connecting to Devers Substation.

Pre-construction compliance materials for Segment 6 were submitted on December 3 and authorization to proceed with construction on non-BLM lands was issued by CPUC on December 10. Construction of Segment 6 began the week of March 24-28 with BMP installation. Vegetation clearing, rock removal, site and access road grading, and foundation activities (drilling and concrete pouring) began April 2019. Tower wreck-out, wire removal, tower assembly, and wire stringing began August 2019 and continued through March 2021 intermittently in accordance with the Project's outage driven move schedule. Roadway

grading/maintenance was conducted throughout the 2019, 2020, and 2021 rainy seasons to facilitate construction vehicle passage. Restoration grading of completed work sites began in November 2020, and hydroseed watering was conducted as necessary throughout the duration of construction (see Photo 10). Construction activities in 2021 included wire, tower, and foundation wreck-out, McCarthy drain installation, site restoration and hydroseeding.

### 2.2.5. NTP #5, Transmission (BLM lands)

The preconstruction compliance package for BLM lands was deemed acceptable by BLM on February 5, 2019. Work began on BLM lands the last week of April 2019 with BMP installation. Vegetation clearing and site and access road grading began May 2019 and foundation activities (drilling and concrete pouring) began June 2019. Tower wreck-out, wire removal, and tower assembly began August 2019 and wire stringing began October 2019 and continued through March 2021 intermittently in accordance with the Project's outage driven move schedule. Roadway grading/maintenance was conducted throughout the 2019, 2020, and 2021 rainy seasons to facilitate construction vehicle passage. Restoration grading of completed work sites began in November 2020, and hydroseed watering was conducted as necessary throughout the duration of construction. Construction activities in 2021 included wire, tower, and foundation wreck-out, McCarthy drain installation, site restoration and hydroseeding.

## 2.3. Compliance During Construction

### 2.3.1. During Construction Compliance Requirements

This section describes the compliance activities that were conducted as required by approved mitigation measures once authorization to start construction was granted. See Section 2.1 for a description of preconstruction compliance requirements that needed to be implemented prior to the start of construction in a given location. Since the start of construction was phased over years, these preconstruction compliance requirements were implemented throughout construction. Section 2.1.1 presents the various plans that were required to be submitted and approved prior to construction and their implementation throughout Project construction and restoration is presented below. Additional construction compliance requirements are also presented below. Implementation of construction compliance requirements was field validated by the CPUC EMs.

#### Air Quality:

- **Fugitive Dust Control Plan (MM AQ 1a).** The Fugitive Dust Control Plan was implemented during construction. This plan included restrictions for vehicle traffic speeds on unpaved roads, watering frequencies for staging areas, stabilization of inactive areas and stockpiles, minimizing drop heights from excavators and loaders, covering soil truck loads, and the discontinuation of construction activities on unpaved areas if visible dust plumes cannot be avoided by approved dust suppression methods.
- **Exhaust Emissions Control Plan (APM AIR 1).** This Plan established a goal of project-wide fleet average reduction of 20 percent NO<sub>x</sub> compared to the estimated unmitigated emissions as presented in the PEA for applicable diesel-fueled off-road construction equipment of more than 50 horsepower.
- **Off Road Equipment (MM AQ 1b).** MM AQ-1b required that off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards. Over the duration of construction, exceptions were allowed on a case-by-case basis that demonstrated one of the following criteria: (1) an off-road equipment item that is a specialty, or unique, piece of equipment that cannot be found with a Tier 3 or better engine after a due diligence search; and/or (2) an off-road equipment item that will be used for a total of no more than 10 days. Each exception request was reviewed by the Aspen Air Quality Specialist. Over the four-year construction period, two exception requests were approved.



On February 17, 2021, SCE received a Notice of Violation from the Air Quality Management District for exceeding the allowable equipment operating hours in December (50 hours max) and was over the maximum annual hours for the year 2020. SCE stated they were under the permitted limit for the entire project and the contractor would be tracking hours on the equipment much closer.

- **Control Helicopter Emissions (MM AQ-1c).** Helicopter emissions were reduced by limiting helicopter idling and using the smallest practical and available helicopter for each lift operation. Fugitive dust from helicopter rotor wash was reduced by watering unpaved helicopter landing areas and/or treating the areas with soil amendments (e.g., water, tackifiers, soil binders) that was applied at a frequency necessary to create and maintain surface soil crusts and prevent visible fugitive dust emissions outside of helicopter staging areas and the Project right-of-way. Further, adequate helicopter flight elevations were used to eliminate dust emissions from rotor wash when travelling between the helicopter staging area and the work sites.

### Biological Resources:

- **Conduct Biological Monitoring and Reporting (MM VEG-1a).** SCE assigned a qualified Lead Biologist, Field Contact Representatives (FCR), and biological monitors to the Project to monitor all work activities during the construction phase; as discussed in Section 2.1.3, CPUC/BLM reviewed and approved biological monitor resumes. The SCE Lead Biologists, FCRs, and biological monitors were responsible for ensuring that impacts to special-status species, native vegetation, wildlife habitat, and sensitive or unique biological resources were avoided or minimized to the fullest extent safely possible. Biological monitors were also responsible to ensure that work activities were conducted in compliance with APMs, mitigation measures, permit conditions, and other project requirements. Each day, prior to work activities at each site, a biological monitor conducted clearance surveys (“sweeps”) for sensitive plant or wildlife resources that may be located within or adjacent to the construction areas. Biological monitors informed construction crews daily of any environmentally sensitive areas (ESAs), nest buffers, or other resource issues or restrictions that affect the work sites for that day. Biological monitors had the authority and responsibility to halt any Project activities that were not in compliance with applicable mitigation measures, APMs, permit conditions, or other project requirements, or will have an unauthorized adverse effect on biological resources. SCE assigned one Lead Biologist to the Project, three Field Contact Representatives, and the number of biological monitors ranged from 2 to 14 based on the level of construction activity.
- SCE prepared and submitted daily, weekly, annual, and final monitoring reports to the CPUC/BLM. The reports noted all daily special status species observations, including location of observation, location and description of project activities in the vicinity for the given reporting period, and any avoidance or other measures taken to avoid the species. In addition, all non-compliance incidents were reported, including nest buffer incursions. All special-status species observations were reported to the CNDDDB (California Natural Diversity Database; see Weekly reports) semi-annually (See Figures 1a through 1d in Attachment 2). No special status species were reported during 2023 construction activities. Table 11 provides a summary of the number of special status species identified for each year of construction.

**Table 11. WOD Upgrade Project Special Status Species Summary**

Species	Status	Annual Number of Observations (Species Events)						Overall Total
		2017	2018	2019	2020	2021	2022	
American Badger ( <i>Taxidea taxus</i> )	SSC	-	-	3	-	1	-	4
American White Pelican ( <i>Pelecanus erythrorhyncho</i> )	SSC	-	1	2	3	-	-	6

Species	Status	Annual Number of Observations (Species Events)						Overall Total
		2017	2018	2019	2020	2021	2022	
Bald Eagle ( <i>Haliaeetus leucocephalus</i> )	SE CFP BLM-S WR-MSHCP	-	-	5	2	1	-	8
Burrowing Owl ( <i>Athene cunicularia</i> )	SSC BLM-S CV-MSHCP WR-MSHCP	-	-	31	22	3	3	56
Cassin's Sparrow ( <i>Peucaea cassinii</i> ) <sup>b</sup>	--	-	-	3	-	-	-	3
Chimney Swift ( <i>Chaetura pelagica</i> ) <sup>b</sup>	--	-	-	1	-	-	-	1
Chuckwalla ( <i>Sauromalus ater</i> ) <sup>b</sup>	--	-	-	3	1	1	1	6
Bald Eagle ( <i>Haliaeetus leucocephalus</i> )	SE CFP BLM-S WR-MSHCP	-	-	5	2	1	-	8
California Legless Lizard ( <i>Anniella pulchra</i> )	SSC	-	-	-	1	-	-	1
Coast Patch-Nosed Snake ( <i>Salvadora hexalepis virgulata</i> )	SSC	-	-	1	1	-	-	2
Cooper's Hawk ( <i>Accipiter cooperii</i> )	WL WR-MSHCP	-	17	13	18	17	2	67
Crissal Thrasher ( <i>Toxostoma crissale</i> )	SSC CV-MSHCP	-	-	1	-	-	-	1
Desert Bighorn Sheep ( <i>Ovis canadensis nelsonii</i> )	CFP BLM-S CV-MSHCP	-	-	1	-	1	-	2
Desert Tortoise ( <i>Gopherus agassizii</i> )	FT, ST CV-MSHCP	-	-	48	86	13	8	155
Ferruginous Hawk ( <i>Buteo regalis</i> )	WL WR-MSHCP	-	8	4	6	1	-	19
Golden Eagle ( <i>Aquila chrysaetos</i> )	CFP BLM-S WR-MSHCP	-	7	11	17	11	2	48
Le Conte's Thrasher ( <i>Toxostoma lecontei</i> )	SSC CV-MSHCP	-	-	1	1	-	-	2
Least Bell's Vireo ( <i>Vireo bellii pusillus</i> )	FT, ST CV-MSHCP WR-MSHCP	-	7	6	-	5	-	18
Loggerhead Shrike ( <i>Lanius ludovicianus</i> )	SSC WR-MSHCP	-	2	33	11	8	5	59
Los Angeles Pocket Mouse ( <i>Perognathus longimembris brevinasus</i> )	SSC	-	-	1	-	-	-	1
Merlin ( <i>Falco columbarius</i> )	WL WR-MSHCP	-	-	3	-	-	-	3
Mountain Lion ( <i>Puma concolor</i> )	SSC WR-MSHCP	-	-	-	1	-	-	1

Species	Status	Annual Number of Observations (Species Events)						Overall Total
		2017	2018	2019	2020	2021	2022	
Northern Goshawk ( <i>Accipiter gentilis</i> )	SSC BLM-S WR-MSHCP	-	-	-	-	-	1	1
Northern Harrier ( <i>Circus cyaneus</i> )	SSC WR-MSHCP	-	1	18	16	11	-	46
Olive-sided Flycatcher ( <i>Contopus cooperi</i> )	SSC	-	-	1	-	-	-	1
Orange-throated Whiptail ( <i>Aspidoscelis hyperythra</i> )	WL	-	5	4	-	2	-	11
Osprey ( <i>Pandion haliaetus</i> )	WL WR-MSHCP	-	-	-	-	2	-	2
Peregrine Falcon ( <i>Falco peregrinus</i> )	CFP WR-MSHCP	1	2	8	8	1	1	20
Prairie Falcon ( <i>Falco mexicanus</i> )	WL WR-MSHCP	-	1	6	5	3	-	15
Red Diamond Rattlesnake ( <i>Crotalus ruber</i> )	SSC WR-MSHCP	-	-	14	20	8	-	42
Ringneck Snake ( <i>Diadophis punctatus</i> ) ( <i>D.p.regalis</i> )	SSC	-	1	1	-	-	-	2
Rosy Boa ( <i>Charina trivirgata</i> ) <sup>b</sup>	--	-	-	8	12	6	2	28
San Diegan Tiger (Coastal) Whiptail ( <i>Aspidoscelis tigris stejnegeri</i> )	SSC	-	1	3	4	-	-	8
San Diego desert woodrat ( <i>Neotoma lepida intermedia</i> )	SSC WR-MSHCP	-	-	2	-	-	-	2
Sharp-shinned Hawk ( <i>Accipiter striatus</i> )	WL WR-MSHCP	1	-	5	-	1	-	6
Silvery Legless Lizard ( <i>Anniella nigra argentea</i> )	SSC	-	-	1	-	-	-	1
Smooth tarplant ( <i>Hemizonia pungens ssp. laevis</i> )	CRPR 1B.1 WR-MSCHP	-	4	-	-	-	-	4
Southern California Rufous-crowned Sparrow ( <i>Aimophila ruficeps canescens</i> )	WL WR-MSHCP	-	-	3	3	-	-	6
Swainson's Hawk ( <i>Buteo swainsoni</i> )	ST BLM-S WR-MSHCP	-	3	2	-	1	-	6
Vaux's Swift ( <i>Chaetura vauxi</i> )	SSC	-	-	3	2	1	-	6
Western Patchnose Snake ( <i>Salvadora hexalepis</i> ) <sup>b</sup>	--	-	-	-	-	1	-	1
Western Red Bat ( <i>Lasiurus blossevillii</i> )	SSC WBWG:H	-	2	-	-	-	-	2
Western Spadefoot ( <i>Spea hammondi</i> )	SSC BLM-S WR-MSHCP	-	-	1	-	-	-	1
Western Yellow Bat ( <i>Lasiurus xanthinus</i> )	SSC WBWG:H	-	1	-	-	-	-	1

Species	Status	Annual Number of Observations (Species Events)						Overall Total
		2017	2018	2019	2020	2021	2022	
White-tailed Kite ( <i>Elanus leucurus</i> )	CFP BLM-S WR-MSHCP	-	3	3	4	2	-	12
Willow Flycatcher ( <i>Empidonax traillii</i> )	SE	-	1	1	11	-	-	13
Yellow-breasted Chat ( <i>Icteria virens</i> )	SSC CV-MSHCP WR-MSHCP	-	2	1	1	-	-	4
Yellow-headed Blackbird ( <i>Xanthocephalus xanthocephalus</i> )	SSC	-	-	2	7	-	1	10
Yellow Warbler ( <i>Dendroica petechia</i> )	SSC CV-MSHCP WR-MSHCP	-	5	12	2	4	-	23
Yuma Myotis ( <i>Myotis yumanensis</i> )	BLM-S IUCN:LC WBWG-:LM	-	10	-	1	-	-	11
<b>Total</b>	<b>2</b>	<b>129</b>	<b>270</b>	<b>266</b>	<b>105</b>	<b>23</b>	<b>756</b>	

<sup>a</sup> Key to Status Designations:

Dashes (-) indicate no observations were documented.

**Federal Designations:**

(FT) Federally Threatened  
(FE) Federally Endangered

**State Designations:**

(SE) State Endangered  
(ST) State Threatened  
(SSC) CDFW Species of Special Concern  
(CFP) CDFW Fully Protected Species  
(WL) CDFW Watch List Species

**Other Conservation Organizations:**

BLM-S = BLM Sensitive  
CV-MSHCP = CV-MSHCP Covered Species  
WR-MSHCP = WR-MSHCP Covered Species  
WBWG = Western Bat Working Group  
H – high priority  
LM – low-medium priority

<sup>b</sup> No current designation but species is considered special status in FRED.

Wildlife mortalities were also reported as follows:

- In 2018, five mortalities occurred including gopher snake (2), ringneck snake (1), Anna's hummingbird (1), and white-crowned sparrow (1). The ringneck snake, of which the subspecies *regalis* (regal ringneck snake) is a CDFW Species of Special Concern (SSC), was observed as roadkill on a Project access road. No mortalities or injuries of FESA or CESA-listed species occurred during the reporting period.
- In 2019, 93 mortalities, representing 45 different species, occurred during the 2019 reporting period. The most common species documented as mortality events included desert woodrat, gopher snake, and common raven. Cause of death was unknown for the majority of mortalities in 2019 (39 events); roadkill was the most common known cause (31 events). Mortalities were documented for eight special-status species. Burrowing owl (1), coast patch nosed snake (1), and rosy boa (1) were identified as roadkill. Cause of death was unknown for loggerhead shrike (1) and a second burrowing owl. Mortality of Los Angeles pocket mouse (1), silvery legless lizard (1), and red diamond rattlesnake (1) occurred during project grading activities. Mortality of DETO, a FESA and CESA-listed species, which was documented six times in 2019, resulted from raven predation or unknown causes.
- In 2020, 159 mortalities, representing 55 different species, occurred during the 2020 reporting period. The most common species documented as mortality events included desert woodrat, common raven, and black-tailed jackrabbit. Cause of death was unknown for the majority of mortalities in 2020 (71 events); roadkill was the most common known cause (41 events). Mortalities were documented for five special-status species. Peregrine falcon, yellow warbler, and one of three desert tortoise mortalities were identified as unknown. One of the two red diamond rattlesnakes was non-

project roadkill, while the other occurred during project grading activities. Mortality of the two remaining desert tortoise mortalities were from possible common raven predation and natural causes.

- In 2021, 34 mortalities, representing 27 different species, occurred during the 2021 reporting period. Six of these mortalities were confirmed to be project related, either as roadkill or line collisions. The most common species documented as mortality events was southern pacific rattlesnake (*Crotalus helleri*), with 3 mortalities. Cause of death was unknown for the majority of mortalities in 2021 (12 events); line collision was the most common known cause (8 events). One mortality event each was documented for two special-status species, DETO and red diamond rattlesnake (*Crotalus ruber*). The DETO mortality was attributed to predation and the cause of death for the red diamond rattlesnake was unknown (non-project related).
- In 2022, 5 mortalities, representing 3 different species, occurred during the 2022 reporting period. None of the mortalities were project related. The most common species documented as Mortality Events was common raven, with 3 mortalities. All 3 mortalities were juveniles associated with nests. Two juveniles became entangled in synthetic nest material unrelated to the project and one juvenile had been predated. One Mortality Event was documented for American coot (*Fulica americana*). A greater white-fronted goose (*Anser albifrons*) was found deceased in the project area; this Mortality Event was documented as “other”. No special-status species mortalities were documented in 2022.
- No mortalities were reported during 2023 monitoring activities.
- **Habitat Restoration and Revegetation Plan (HRRP) (MMVEG-1d).** The HRRP describes the methods for restoration and revegetation of all areas temporarily disturbed by the Project with the overall goal to restore habitats within the temporarily disturbed work areas to functioning, established, early successional communities that will facilitate succession and provide available habitat for the special-status species associated with the Project. Vegetation and land cover types within the Project ROW that were affected by Project construction included grassland/forbland, chaparral, coastal sage scrub, desert scrub, coast live oak woodland, riparian woodland, alluvial scrub, agricultural land, and disturbed/developed areas. Prior to the start of ground-disturbing activities, field surveys were conducted to determine the pre-disturbance baseline conditions on all temporary disturbance areas planned for restoration and revegetation efforts and used to refine site-specific habitat restoration methods. During construction topsoil and vertical mulch salvage and storing occurred onsite where feasible. Restoration and revegetation of temporary disturbance areas followed the completion of construction activities as soon as practical in the affected area. To the extent feasible, seeding occurred the fall following the completion of construction activities. If construction was completed outside that timeframe, the area was graded to restore the original contours, stabilized according to the project SWPPP, and any weeds were addressed according to the IWMP.
- **Integrated Weed Management Plan (IWMP) (MM VEG-2a).** Botanical surveys conducted in 2012 and 2013 identified 40 weed species within the Project area that are on the State of California CDFA and/or Cal-IPC weed lists (Table 2-1). Verification of land cover and weed mapping was conducted in May 2015 and 26 weed species were mapped during the 2018 spring and fall surveys. Based on survey results, the following weed management zones were established prior to the start of construction:
  - Weed Zone A: Segments 1, 2, 3 and 4 up to the intersection of Fraser Street and Moore Street in Banning
  - Weed Zone B: Intersection of Fraser and Moore Street to the west side of the Sunnyslope Cemetery in Banning
  - Weed Zone C: Segments 5 and 6

The IWMP described the methods of preventing or controlling project-related spread of weeds or new weed infestations via the transport of weed seeds onto the ROW, or from one section of the ROW to another. Methods that were implemented during construction included the inspection (for dirt and mud that could contain weed seeds, roots, or rhizomes) and cleaning of construction vehicles at entry points to specified portions of the ROW, and before leaving work sites where weed occurrences needed be contained locally. Other construction vehicles (e.g., pick-up trucks) that were frequently entering and exiting the Project were inspected and washed on an as-needed basis. Tools such as chainsaws, hand clippers, pruners, etc., were cleaned of dirt and mud before entering project work areas. Erosion control materials (e.g., hay bales) had to be certified free of weed seed before they were brought onto the Project. Annual IWMP Reports were submitted that described weed survey, preventative, and removal activities conducted each year.

Throughout 2018, SCE and their contractor remained in compliance with MM VEG-2a and effectively implemented preventative weed control measures on the Project. No weed populations required chemical or mechanical weed removal prior to construction or after construction activities, either because the species are considered ubiquitous and have limited treatment requirements or could not feasibly be treated (e.g. because they were not in a growth stage suitable for control measures or because a population covered an entire disturbance area).

Throughout 2019, SCE and their contractor remained in compliance with MM VEG-2a and implemented preventative weed control measures on the Project in 2019. Preconstruction weed removal did not occur in 2019 because construction activities were conducted primarily in areas where ubiquitous species or species designated as category NT (No Treatment) occur (e.g., Russian thistle [*Salsola tragus*], brome grasses [*Bromus* spp.], slender oats [*Avena barbata*]). No weed occurrences received chemical or mechanical treatment in 2019.

Throughout 2020, SCE and their contractor remained in compliance with MM VEG-2a and implemented preventative weed control measures on the Project in 2020. The composition and distribution of targeted noxious weed species in the Project area remained largely consistent in 2020 with respect to the 2018 baseline conditions. The most abundant weeds occurred in the full range of densities throughout the segments where they occur. Russian thistle occurred throughout Segment 3 and in large quantities in Segment 2. Saharan mustard occurred in the greatest densities in Segments 5 and 6. Tocalote (*Centaurea melitensis*) was mapped in the largest numbers on Segments 2 and 3. Tree tobacco (*Nicotiana glauca*) occurred in the greatest quantities in Segments 2 and 3. Yellow star thistle (*Centaurea solstitialis*) only occurred in Segments 3 and 4. Preconstruction weed removal did not occur in 2020 because construction activities were conducted primarily in areas where ubiquitous species or species designated as category no treatment occurred. Weed control measures were implemented within active restoration sites, with the goal to return each site to a restored state following construction activity. Mechanical treatment was performed up to three times within temporary disturbance areas associated with restoration sites along Segment 2, Segment 3, and Segment 4 assist in meeting restoration goals.

Throughout 2021, SCE and their contractor remained in compliance with MM VEG-2a and implemented preventative weed control measures on the Project. Biological monitors conducted inspections to ensure compliance with preventative weed control measures. The composition and distribution of targeted noxious weed species in the Project area remained consistent in 2021 with respect to the 2018 baseline conditions. The most abundant weeds occurred in the full range of densities throughout the segments where they occurred as reported in 2020. Weed control measures were implemented within active restoration sites, with the goal being to return each site to a restored state following construction activity. Non-native species were removed from sites prior to seeding during restoration implementation.

An addendum was added to the IWMP on September 15, 2022 to incorporate observances, goals for management, treatment options, monitoring protocols, and success criteria for stinknet (*Oncosiphon piluliferum*), a species which is now regarded as a highly invasive species by the California Invasive Plant Council (Cal-IPC) and California Department of Food and Agriculture (CDFA). The existing IWMP protocols were not changed, rather, this Addendum reflected the updates to applicable sections of the IWMP as they relate to this additional invasive weed species and adopting it into the IWMP program.

Throughout 2022, SCE and their contractor remained in compliance with MM VEG-2a and implemented preventative weed control measures on the Project. The fall 2022 weed survey excluded small portions of Segments 3, 4, 5, and 6. Most of the excluded portions of the project area were due to property access issues and unsafe road conditions. Areas associated with 3X35, 3X48, 4X06 through 4X10, 6S28A, M91-T2, 3X32, 4X37, 4X40, 4X46, 4X48, 4X17, 4X18, 4X19, as well as survey buffers in the vicinity of Painted Hills Road and the area east of Whitewater Canyon Road were inaccessible. With respect to baseline 2018 conditions, the composition and distribution of targeted noxious weed species in the Project area remained largely consistent in 2022. The most abundant weeds occurred in the full range of densities throughout the segments they occurred and reported in previous years. Weed mapping concluded at the end of 2022 following the fifth consecutive year. Weed control activities continued to be conducted in conjunction with restoration activities until success criteria are met.

Throughout 2023, SCE and their contractor remained in compliance with MM VEG-2a and implemented preventative weed control measures on the Project. The spring 2023 weed survey excluded small portions of Segments 2, 4, 5, and 6. Most of the excluded portions of the project area were due to property access issues and unsafe road conditions. Areas associated with PP123303, 2N252N29, 2N30, 2N39, 4X05, 4X37, 4X38, 4N59, 4N62, 5X29, 5X34, 5X35, 5X48, 6S28A, as well as survey buffers in the vicinity of Painted Hills Road and the area east of Whitewater Canyon Road were inaccessible. With respect to baseline 2018 conditions, the composition and distribution of targeted noxious weed species in the Project area remains largely consistent in acreages and densities in 2023. Field observations suggest certain target weed species are expanding independent of Project activity (e.g., crimson fountain grass [*Pennisetum setaceum*], in Segment 6, where recruitment is occurring near parent plants in the absence of Project-related disturbance). In addition, plants such as Spanish broom (*Spartium junceum*), giant reed (*Arundo donax*), or perennial pepperweed (*Lepidium latifolium*) are either found in small numbers or in isolated occurrences, often in areas not disturbed by Project activity. Weed control activities for the contractor concluded in 2023, all restoration sites were signed over to SCE for monitoring and maintenance going forward.

**Habitat Mitigation and Monitoring Plan (HMMP) (MM VEG-3a).** A total of 206 drainages were estimated to be temporarily and/or permanently affected by Project construction. Impacts related to construction and operation of the Project include permanent impacts to 0.96 acre of waters of the United States and State, subject to regulation by USACE, SWRCB, and EPA, and 1.04 acres of lake and streambed resources subject to regulation by CDFW. Only 0.15 acre of wetlands was expected to be permanently impacted. In addition, the Project was expected to result in temporary impacts to 4.59 acres of waters of the United States and State, subject to regulation by USACE, SWRCB, and EPA, and 5.33 acres of CDFW lake and streambeds. The HMMP defined restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat. During construction, impacts to jurisdictional waters were avoided where feasible and unavoidable impacts were mitigated according to the conditions of the waters permits and as described in the HMMP. Annual monitoring reports included a summary of the reclamation, revegetation, or restoration activities for the year, a discussion of whether performance standards for the year were met, any remedial actions conducted and recommendations for remedial action, if warranted, that were planned for the upcoming year.

The initial 2018/2019 planting season 1 (PS1) included one site, Construction Area 4N63, associated with 0.44 acres of temporary impacts to jurisdictional features. Hydroseeding was the method employed to reseed the restoration areas. After decompaction and application of salvaged topsoil, the soil was moistened to allow the seed to stick to the soil surface. One ephemeral channel that was present prior to construction was also recontoured. Maintenance and weed control activities required by the HMMP were performed during the 2018-2019 execution period and 2019-2020 growing season including watering, weed and erosion control, and trash and debris removal by the Restoration Contractor (RC) and Restoration Ecologist (RE). Restoration area 4N63 met the long-term (5-year) performance criterion for absolute native cover and a woody stem density higher than the 5-year criterion during Year 1. Relative non-native cover remained high at restoration area 4N63 despite weeding activities; however, the current composition of native and non-native plants was a measurable improvement from pre-disturbance conditions. Restoration area 4N63 met the Year 1 success criteria and was approved and accepted by SCE on October 29, 2020.

In the 2019/2020 planting season 2(PS2), two sites associated with temporary impacts to jurisdictional features were restored in Segment 3, Construction Areas 3X25 and 3X33. A total of approximately 0.02 acres of temporary disturbance area was monitored during Year 2 across both of the restoration sites. The restoration sites were contour-graded as close as possible to the pre-impact condition prior to implementation of restoration activities. Soil salvage did not occur at the two sites restored in 2020. Hydroseeding was the method employed to reseed the restoration areas. Maintenance activities required by the HMMP were performed during the execution period and 2020-2021 maintenance period included watering, weed and erosion control, and trash and debris removal by the RC and RE. Both restoration sites were on a trajectory to meet the 5-year criteria for non-suitable SKR grassland habitat with less than 10 percent native cover, which require that weed invasion is minimized through implementation of the IWMP, and dust generation and soil erosion are controlled according to the SWPPP. In addition, Construction Area 3X33 met the Year 1 success criteria for native habitats. Both sites were approved and accepted by SCE on November 2, 2021.

In the 2020/2021 planting season 3 (PS3), restoration activities continued at sites within Segments 2, 3, 5, and 6. Restoration activities were conducted as in previous years including trash and debris removal from all sites, physical removal of target invasive plant species including hand pulling and removal with a hoe or other hand tools, contour-grading as close as possible to the pre-impact site condition, application and scarification of topsoil where salvaged, and seeding using Project approved seed mixes. Maintenance activities required by the HMMP were performed during the execution period and 2021-2022 maintenance period included watering, weed and erosion control, and trash and debris removal by the RC and RE. The Project is on track to meet the long term (5-year) performance criteria. Approximately 130 of 134 sites in the monitoring group had at least 1/3 of the native absolute cover required to meet the 5-year requirement, with many at or over the 5-year requirement. Many sites with woody vegetation communities had a woody stem density near or higher than the 5-year criterion. Relative non-native cover remained high at many restoration areas despite weeding activities. Weeding and watering during the growing season as required by weather, and maintenance activities such as erosion control are scheduled to continue to ensure that restoration areas continue on a trajectory suitable for meeting performance criteria at the end of the 5-year monitoring period.

In the 2021/2022 growing season a total of 26 restoration sites, which included 0.08 acres of direct temporary impacts to jurisdictional features (15 features), were monitored. All restoration sites were progressing toward a stable, pre-disturbance condition one-year post-restoration. Absolute cover of native species and woody native stem density were on a trajectory towards meeting the Year 5 criteria. Six sites already exceeded the absolute native cover target goal, and 19 sites exceeded the stem density target goal. Two sites achieved successful relative native cover levels. However, the maximum relative non-native cover level was exceeded at 22 of the 26 sites. As the monitored sites were seeded with



sufficient coverage, weeded per the IWMP, and reached the agreed-upon acceptable conditions, they were recommended for site sign-off. All 26 sites were approved and accepted by SCE as of October 18, 2022, marking the end of the first year of restoration and revegetation work and therefore construction. The monitoring results suggested that all 26 sites are on a trajectory to meet the success criteria at the end of the 5-year monitoring period. Weed management and watering will continue and no remedial measures were recommended.

HMMP restoration monitoring results reported in 2023 suggested that the program was progressing as expected. In total, of the 28 restoration areas, which had a total of 25,183.03 square feet (0.578 acre) of temporary impacts to jurisdictional wetlands/waters, seven HMMP restoration areas have met all HRRP success criteria as of 2023 and are being requested to be removed from the long-term monitoring program. Six HMMP restoration areas were recommended to be excluded from the long-term monitoring program due to ongoing anthropogenic activities. 15 HMMP restoration areas have not met all HRRP success criteria and will remain in the long-term monitoring program throughout the 2024 Year 6 reporting period. However, all 15 (100 percent) of those HMMP restoration areas not meeting success criteria have only completed Years 1 or 2 of the five-year restoration program. It is expected that all restoration areas will have achieved all success criteria before the end of their five-year LTM period after recommended adaptive management actions have been taken.

- **Special-Status Plants (VEG-4a).** Avoidance of special-status plants was the preferred strategy wherever feasible. Where avoidance was not feasible, and the Project would directly or indirectly affect more than 10 percent of a local occurrence, by either number of plants or extent of occupied habitat, SCE implemented the Special-Status Plant Salvage and Relocation Plan which consisted of off-site compensation, salvage, or horticultural propagation and off-site introduction. Native cactus (excluding chollas in the genus *Cylindropuntia*) and yuccas (excluding chaparral yucca, *Y. whipplei*), were also avoided or salvaged according to the Plan. Within MSHCP areas, mitigation for the Project's impacts to special-status plants covered under the Plan were implemented according to the requirements of the MSHCP. Annual reports were submitted that presented a summary of special-status plant salvage activities. Special-status plant observations and compliance activities included the following:
  - In 2018, special-status plant salvage activities on the Project included collection, cleaning, and storage of Yucaipa onion, Parry's spineflower white-bracted spineflower, and smooth tarplant seeds. Seeds from these collections remained in long-term storage at California Botanic Garden (formerly known as Rancho Santa Ana Botanic Garden) in Claremont, California until December 5, 2022. Construction activities did not occur within sites requiring soil salvage for special-status plants in 2018.
  - In 2019, a combination of seed collection and soil salvage from subpopulations of chaparral sand verbena, Parry's spineflower, and white-bracted spineflower were performed. Soil was salvaged at sites where salvage and stockpile storage were feasible based on the criteria outlined in the Special-Status Plan Salvage and Relocation Plan. These special-status plant salvage efforts were restricted to Segments 5 and 6. In addition, seven Habitat Events associated with Plummer's mariposa lily (*Calochortus plummerae*) were identified in Segment 4 during preconstruction surveys. Although no buffer was required, ESA signs were established along access roads and edges of work areas. Individual plants that cannot be feasibly avoided will be addressed in accordance with the Plant Salvage Plan.
  - In 2020, no special-status plant salvage, or relocation efforts were conducted. No seeding or transplantation of special-status plants have occurred to date.
  - Special-status plant salvage activities did not take place in 2021, except for replacement of salvaged soil during restoration activities. Seeding or transplantation of special-status plants also did not occur in 2021 and no maintenance or monitoring activities were necessary. Mapping of final project-

related disturbances will be reconciled with rare plant populations to determine actual impacts and required actions in 2022.

- Special-status plant salvage activities (new soil salvage or seed collections) did not take place in 2022. Seeds of target special-status plant species had been collected in 2018 and 2019 at locations where construction impacts were anticipated to occur. However, preliminary impacts analysis indicates that impacts at each location subject to the Plant Salvage Plan did not exceed 10 percent of the target plant occurrence, therefore continued salvage activities (i.e., relocation), maintenance, and monitoring were no longer required at these locations. All stored rare plant seeds were transferred to SCE’s contractor on December 5, 2022, and were broadcast seeded at or near their original collection locations during the winter of 2022-2023.
- **Wildlife Handling Guidelines (MM WIL-1b).** The Wildlife Handling Guidelines consolidated the requirements, procedures, and techniques for dealing with wildlife found on or near Project roads, work areas, or the right-of-way that were entrapped, injured, orphaned, dead, in harm’s way, or that pose a risk to humans. Other than crew notification to the biological monitors, the guidelines and procedures were implemented by the biological monitors.
- **Nesting Bird Management Plan (NBMP) (MM WIL-1c).** The NBMP specified SCE’s strategy and specific procedures to comply with applicable federal and State regulations and permits, as well as to identify specific mitigation requirements pertaining to nesting birds encountered during construction of the Project. The NBMP established required buffers by non-special status species and the process to reduce the buffers based on construction and field conditions. The NBMP also specified the process for inactive nest removal is to prevent or reduce the potential reuse of a currently inactive nest (e.g., return of a pair to the specific site) in a high-risk location. The SCE Avian Lead Biologist was responsible for implementation of the NBMP, as well as approving buffer reductions and buffer modifications. For special-status species, CDFW and/or USFWS consultation was conducted. Daily nest summaries, weekly reports, and annual reports were submitted to CPUC/BLM. Table 12 provides a summary of the number of nests for which the NBMP was implemented for each year of construction. The annual reports provided sufficient substance and detail to provide the basis for adaptive management and evaluation of lessons learned, and were submitted to CPUC, BLM, CDFW, and USFWS. Annual meetings to review the annual reports and “lessons learned” occurred prior to the start of each subsequent nesting season.

**Table 12. WOD Upgrade Project Nesting Summary**

Year	# of Nests	Fledged	Failed	Unknown	Species
2018	99	68 (69%)	25 (25%)	6 (6%)	house finch (31), least Bell’s vireo (15), common raven (12), red-tailed hawk (11), mourning dove (5), northern mockingbird (4), Anna’s hummingbird (3), Cassin’s kingbird (3), Bewick’s wren (2), western kingbird (2), American crow (1), black Phoebe (1), blue-gray gnatcatcher (1), bushtit (1), California towhee (1), golden eagle (1), great horned owl (1), Lawrence’s goldfinch (1), red-shouldered hawk (1), spotted towhee (1), western bluebird (1)
2019	291	202 (69%)	62 (21%)	27 (9%)	common raven (66), red-tailed hawk (23), least Bell’s vireo (21), cactus wren (19), Anna’s hummingbird (13), California towhee (12), Cassin’s kingbird (12), mourning dove (10), bushtit (9), western kingbird (8), burrowing owl (7), lark sparrow (7), northern mockingbird (7), hooded oriole (6), lesser goldfinch (6), Nuttall’s woodpecker (5), Bewick’s wren (4), blue-gray gnatcatcher (4), house finch (4), black-tailed gnatcatcher (3), California thrasher (3), house wren (3), Lawrence’s goldfinch (3), Phainopepla (3), black-chinned hummingbird (2), black phoebe (2), California quail (2), greater roadrunner (2), killdeer (2),

Year	# of Nests	Fledged	Failed	Unknown	Species
					northern rough-winged swallow (2), rock wren (2), acorn woodpecker (1), American goldfinch (1), American robin (1), ash-throated flycatcher (1), barn owl (1), black-throated sparrow (1), blue grosbeak (1), Brewer's blackbird (1), Bullock's oriole (1), golden eagle (1), great horned owl (1), horned lark (1), loggerhead shrike (1), red-shoulder hawk (1), song sparrow (1), spotted towhee (1), wrenit (1), yellow warbler (1), yellow-breasted chat (1)
2020	474	375 (79%)	91 (19%)	8 (2%)	Common raven (92), Anna's hummingbird (37), cactus wren (34), least Bell's vireo (30), lesser goldfinch (26), red-tailed hawk (23), mourning dove (23), house finch (18), bushtit (16), Cassin's kingbird (11), northern mockingbird (11), California towhee (11), burrowing owl (8), Nuttall's woodpecker (7), California thrasher (7), American goldfinch (7), house wren (6), phainopepla (6), western kingbird (6), black-chinned hummingbird (5), loggerhead shrike (5), killdeer (4), verdin (4), black-throated sparrow (4), song sparrow (4), yellow warbler (4), ash-throated flycatcher (3), great horned owl (3), greater roadrunner (3), rock wren (3), red-shouldered hawk (3), Southern California rufous-crowned sparrow (3), Cooper's hawk (3), California quail (3), Costa's hummingbird (3), barn owl (2), Bewick's wren (2), black-headed grosbeak (2) blue grosbeak (2), blue-gray gnatcatcher (2), Brewer's blackbird (2), hooded oriole (2), lark sparrow (2), Lawrence's goldfinch (2), red-winged blackbird (2), Say's phoebe (2), spotted towhee (2), white-tailed kite (2), wrenit (2), Bullock's oriole (1), cliff swallow (1), downy woodpecker (1), golden eagle (1), Lazuli bunting (1), oak titmouse (1), Virginia rail (1), western bluebird (1), western screech-owl (1), common yellowthroat (1)
2021	298	229 (77%)	68 (23%)	1 (0%)	Acorn woodpecker(2), American goldfinch (1), American kestrel (1), barn owl (3), black-chinned hummingbird (5), black-tailed gnatcatcher (1), Bullock's oriole (1), California quail (1), California thrasher (2), great horned owl (3), hooded oriole (5), killdeer (2), least Bell's vireo (1), loggerhead shrike (5), Nuttall's woodpecker (3), oak titmouse (1), red-winged blackbird (3), rock wren (1), verdin (1), western bluebird (1), white-tailed kite (1), yellow warbler (1), bushtit (12), (non-coastal) cactus wren (20), Cassin's kingbird (14), common raven (91), lesser goldfinch (12), red-tailed hawk (24), cliff swallow (3), greater roadrunner (3), house wren (3), northern mockingbird (15), house finch (15), western kingbird (7), phainopepla (6), red-shouldered hawk (2), Anna's hummingbird (6), California towhee (3), burrowing owl (10), mourning dove (5), black-headed grosbeak (1), blue-gray gnatcatcher (1)
2022	45	37 (72%)	8 (28%)	0 (0%)	Great horned owl (1), lesser goldfinch (1), common raven (32), red-tailed hawk (10), mourning dove (1)
2023	2			2	Common raven (2)

- During Project construction, 2018-2022 breeding seasons, a total of 1,207 active nests of 68 different species were monitored to completion by SCE. The average success rate among documented nests was 75 percent. The most abundant nesting species observed during construction was Common

Raven (*Corvus corax*) with 293 nests. A total of 147 raptor nests were observed during construction, 91 of which were Red-tailed Hawk (*Buteo jamaicensis*) nests. Burrowing Owl (*Athene cunicularia*) nest burrows were also documented in the Project area during construction. A total of 25 BUOW nests were monitored to completion; however, several additional nest burrows were still active when construction concluded or never had signs of nesting activity.

- Predation was the cause of for 36 percent of documented nest failures during construction (91 out of 254 nests). Additional common causes of nest failures included natural events, such as inclement weather or wind; recreation (e.g., Off-Highway Vehicle use); domestic animals (e.g., grazing, stray pets); human interference; and landscape maintenance. In several instances, failure was documented when a red-tailed hawk pair had established and used an alternate nearby nest. The cause of failure could not always be determined for nests but was evident by prolonged absence of adults. No failures were determined to be attributed to project activities.
  - The outcome of 42 nests monitored during construction was unknown (3 percent). An unknown status was documented when a nest could not be viewed due to obstructions (e.g., vegetation), when the observers feared that approach of the nest location may have risked take of the nest, and/or when a nest status change occurred during a period when the nest was not being regularly monitored (e.g., a nest in an area where no project work was occurring). Since these nests could not be visibly viewed by an Avian Biologist an outcome could not be definitively determined. However, although the outcomes were unknown, based on the overall project fledge rate, 75 percent of these 42 nests (i.e., 32 nests) were likely to have successfully fledged.
  - During the construction phase of the project, a total of 492 buffer modifications were implemented for 361 nests. A total of 293 nests with reduced buffers successfully fledged young (81 percent) and 57 were documented failures (16 percent). None of the documented failures for nests with buffer reductions were determined to be project-related. No project activities were occurring in the buffer or recent past when the nests were declared “failed.”
  - A total of twelve nest buffer incursions occurred during Project construction. Of those incursions, seven were helicopter-related (three level 2 Incidents, two level 1) and five were ground based incursions (level 1). Helicopter-based nest incursions were identified when the SCE project team and Aspen reviewed flight tracks using a 3-dimensional model generated in GIS during bi-weekly compliance meet.
  - During the 2023 restoration activities conducted by the contractor, each restoration site was searched for nests during pre-activity clearance sweeps and monitoring by the Biological Monitor. As restoration activities were completed quickly, and restoration crews would not be returning, nests were not revisited for follow-up monitoring resulting in an unknown outcome for the nests. No buffer incursions or other non-compliances related to nesting birds were documented during the 2023 reporting period.
- **Raven Monitoring, Management, and Control Plan (MM WIL 2b).** The purpose of the Raven Plan was to minimize Project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, restoration, and O&M phases. The threshold for implementation of Plan raven control measures is any increases in raven numbers from baseline conditions, as detected by monitoring. During construction, SCE was also responsible for all other aspects of raven management described in the Raven Plan, such as avoidance and minimization of project-related trash, water sources, or perch/roost/nest sites that could contribute to increased raven numbers. Plan implementation applied to BLM and Morongo Tribal (recommended) lands, and the CV-MSHCP.

The first-year post-construction raven surveys were conducted from February 23 to May 17, 2022 over four rounds of surveys. Eight raven nests were observed on existing WOD transmission structures during the surveys, one of which was active at the time of identification. Three of the inactive nests became active later in the season. None of the nest locations were associated with desert tortoise remains. No desert tortoise carcasses or remains were noted within the survey area during the 2022 surveys. While the total number of nests present in the first-year post-construction was greater than the number identified during the preconstruction baseline surveys in 2018, the number of active nests actually decreased (9 in 2018, 7 in 2022). It should also be noted that two of the inactive raven nests identified during the 2022 surveys were located on structures that have since been removed and are thus no longer present. No desert tortoise remains were observed in the survey area during either the baseline 2018 or the post-construction 2022 surveys. Therefore, the absence of offending raven activity remained unchanged after construction.

- **Wildlife Noise Monitoring Plan (MM WIL 2c, WIL 2e).** As required by mitigation, when an active nest or territory for listed riparian birds or coastal California gnatcatcher was found, a 500-foot disturbance-free ground buffer and 1,000-foot vertical helicopter buffer were established around nest sites in accordance with Project mitigation measures. Noise monitoring, minimization, and management requirements of the Wildlife Noise Monitoring Plan were implemented within these construction buffers. Construction work areas requiring Plan implementation included Segment 3 near the El Casco Substation. Daily logs were maintained by the Project and annual reports were submitted to CPUC, BLM, CDFW, and USFWS.
- **Stephens' Kangaroo Rat (SKR) (WIL-2d).** As noted in Section 2.1.3, focused SKR surveys conducted in 2015, 2016, 2017, and 2018 were negative; therefore, consultation with CDFW and USFWS and the need to obtain appropriate take authorization or permits was not required. No SKR sign has been detected during preconstruction pedestrian surveys to date, negating the need for additional trapping surveys. Preconstruction pedestrian surveys occurred in project areas with suitable habitat in areas of new construction, thus addressing all SKR measures required by the FEIR/FEIS, BO, and ITP. No SKR were observed during monitoring efforts for the entirety of the project.
- **Golden Eagle (MM WIL-2f).** This mitigation measure required that annual golden eagle (GOEA) nesting surveys be conducted beginning at least one year prior to the start of construction, and continuing throughout the construction phase of the Project, for all GOEA habitat use within a 2-mile radius of the portions of the Project area where work will occur during the breeding season (December 1 through July 31). GOEA observations and compliance activities included the following:
  - In 2018, seven GOEA were observed during monitoring efforts in Segment 4. For Segment 4 subtransmission work, SCE implemented a one-mile line-of-sight and one-half mile no line-of-sight buffer to ensure that project construction activities did not result in injury or disturbance to GOEA. For this buffer, SCE did request a buffer reduction, which was denied by USFWS; construction was delayed until the nest fledged. No additional Project work occurred within golden eagle habitat.
  - In 2019, eleven GOEA were observed during preconstruction surveys and monitoring efforts in Segments 3, 4, 5, and 6; however, no buffer reductions were required.
  - In 2020, seventeen GOEA were observed during spotting scope surveys and monitoring efforts in Segments 4, 5, and 6; however, no buffer reductions were required.
  - In 2021, GOEA were observed during monitoring efforts in Segments 5 and 6.
  - No GOEA were observed during monitoring efforts in 2022 or 2023.

- **Burrowing Owl (MM WIL 2g).** Per the Burrowing Owl Management and Passive Relocation Plan (BOMP), if active burrowing owl burrows were located within Project work areas, passive relocation by qualified Project biologists was required by MM WIL-2g. Burrowing owl observations and compliance activities included the following:
  - In 2018, no burrowing owl were observed.
  - In 2019, 31 burrowing owl observations were documented within Segments 5 and 6 during preconstruction surveys and monitoring events and included both burrows and live individuals. Several of these observations were associated with nest events. Two burrowing owl mortalities were documented.
  - In 2020, 22 burrowing owl observations were documented within Segments 4, 5, and 6 during preconstruction surveys and monitoring events and included both burrows and live individuals. Several of these observations were associated with nest events.
  - In 2021, BUOW observations were documented within Segment 5 during preconstruction surveys and monitoring events and included both burrows and live individuals. Two of these observations were associated with nest events.
  - In 2022, Five BUOW burrows from the previous breeding season remained active in FRED per the BOMP. 1 nest burrow fledged and the other 4 were presumed to have fledged in 2021. However, these 4 burrows were not monitored during the 2022 breeding season as construction activities did not occur nearby.
  - In 2023, BUOW nest burrows were present in the project area during the 2023 reporting period. However, these nest burrows, which were not monitored in 2023, are either still active or never had signs of nesting activity.
- **Special-Status Terrestrial Herpetofauna (MM WIL-2h).** As required by MM WIL-2h, if any terrestrial herpetofauna were found during Project construction, the animal was allowed to move away from the construction site on its own, or a qualified biologist relocated it to nearby suitable habitat outside the construction area and placed it in the shade of a shrub. If potentially suitable burrows or rock piles were found, they were checked for occupancy and if occupied, flagged and avoided (employing a 50-foot buffer). If the burrow could not be avoided, it was excavated, and the occupant relocated to an unoccupied burrow outside the construction area and of approximately the same size as the one from which it was removed. If an existing burrow was unavailable, the biologist constructed or directed the construction of a burrow of similar shape, size, depth, and orientation as the original. Herpetofauna observations and compliance activities included the following:
  - In 2018, no special-status herpetofauna species were observed.
  - In 2019, eight species of special-status herpetofauna were observed during monitoring efforts for the project.
  - In 2020, seven species of special-status herpetofauna were observed during monitoring efforts for the project.
  - In 2021, five species of special-status herpetofauna were observed during monitoring efforts for the project.
  - In 2022, two species of special-status herpetofauna were observed during monitoring efforts for the project.
  - No special status herpetofauna were reported during monitoring efforts for the Project in 2023.

- **Bats (MM WIL-2i).** Any active bat roosts, including occupied day roosts, maternity roosts, and hibernacula, were identified and exclusion areas were established (300 feet for special-status species and 165 feet for common species). Bat observations and compliance activities included the following:
  - In 2018, three special-status bat species were observed including Yuma myotis (*Myotis yumanensis*), western red bat (*Lasiurus blossevillii*), and western yellow bat (*Lasiurus xanthinus*) for which 300-foot buffers were established at 10 separate habitat locations. In addition, common bat species observed included Big Brown Bat (*Eptesicus fuscus*) and Silver-haired Bat (*Lasionycteris noctivagans*) for which 165-foot buffers were established at 8 separate habitat locations. On Segment 3, SCE was granted CPUC approval to allow construction vehicle passage through the exclusion area if the vehicles were accompanied by a biological monitor.
  - In 2019, two special-status and one unknown bat species were observed. A 165-foot buffer was established for a single Brazilian free-tailed bat (*Tadarida brasiliensis*), a common bat species, location. No work occurred within the unknown bat species habitat and in the future, a 14-day emergence survey will be conducted prior to the start of construction in this area.
  - In 2020, only one observation of Yuma myotis was documented during monitoring efforts for the project.
  - No bat observations were documented during monitoring efforts for the Project in 2021 through 2023.
- **Special-status Small Mammals (MM WIL-2j).** Potentially active woodrat nests were flagged with a minimum 10-foot avoidance buffer. If avoidance was not possible, in accordance with the Special-Status Small Mammals Avoidance and Minimization Plan, the following sequential steps were taken to facilitate woodrat clearance from their nests: (1) all understory vegetation was cleared in the area immediately surrounding active nests followed by a period of one night without further disturbance to allow woodrats to vacate the nest, (2) each occupied nest was then disturbed by a qualified wildlife biologist until all woodrats left the nest and sought refuge off-site, and (3) the nest sticks were removed from the Project site and piled at the base of a nearby shrub or tree. Relocated nests were spaced no closer than 100 feet apart, unless a qualified wildlife biologist determined that a specific habitat could support a higher density of nests. SCE documented all relocated woodrat nests in weekly and annual reports to the CPUC, BLM, and CDFW. Woodrat observations and compliance activities included the following:
  - In 2018, no woodrats were observed.
  - In 2019, 790 middens were identified in Segments 4, 5, and 6 for which 10-foot buffers were established. 102 woodrat middens that could not be avoided during construction were relocated and another 3 middens were naturally removed (i.e., no longer present). One Habitat Event was associated with the special status San Diego desert woodrat (*Neotoma lepida intermedia*). This midden, located within a disturbance area in Segment 5, was successfully relocated. Nine woodrat mortalities were documented.
  - In 2020, 246 middens were identified in Segments 4, 5, and 6 for which 10-foot buffers were established. 35 woodrat middens that could not be avoided during construction were relocated and another 3 middens were naturally removed (i.e., no longer present). Seventeen woodrat mortalities were documented.
  - In 2021, 79 middens were identified in Segments 3 through 6. 18 woodrat middens that could not be avoided during construction were relocated and another 2 middens were naturally removed. There were no documented woodrat mortalities.

- No new desert woodrats were observed, and no middens were removed or relocated during monitoring efforts for the Project in 2022 or 2023.

LAPM observations and compliance activities included the following:

- In 2018, preconstruction LAPM trapping surveys were conducted within the Smith Creek area of the Banning-Valley telecommunications improvement route. No LAPM were captured within the fenced construction sites. Traps were also set outside the fenced sites to determine if LAPM were using the surrounding areas. Four LAPM were captured in the outside traps; however, impacts to these individuals (and any other LAPM in the surrounding area) were avoided during construction due to the presence of the exclusion fencing.
  - In 2019, no construction activities occurred within LAPM habitat. One LAPM mortality was documented following vegetation clearing at 4X34. This mortality occurred outside the WR-MSHCP-designated Small Mammal Survey Areas and approximately 0.25 mile east of the nearest survey area and/or mapped suitable LAPM habitat. The mortality was promptly reported in FRED and RCA was notified. However, as the mortality was incidental to otherwise lawful and compliant construction activity, SCE was not required to take any additional actions.
  - In 2020, no construction activities occurred within LAPM habitat and no observations were documented during monitoring activities.
  - In 2021, construction activities occurred at two locations within LAPM habitat in the WR-MSHCP area of the project. Wire and structure removal was conducted at PP123308 (Noble Creek) and at PP123353 – PP123356 (San Gorgonio Wash). Preconstruction clearance surveys and sweeps were conducted at each location and an LAPM-approved Biologist was present during each day of construction per the LAPM Plan. No LAPM were observed during preconstruction clearance surveys, sweeps, or monitoring activities.
  - No LAPM were observed during preconstruction clearance surveys, sweeps, or monitoring efforts for the Project in 2022 or 2023.
- **American Badger, Ringtail, and Desert Kit Fox (MM WIL-2k).** As part of preconstruction surveys, each kit fox, ringtail, and American badger den was classified as inactive, potentially active, active non-natal, or active natal. Inactive dens located in Project disturbance areas were excavated by hand and backfilled to prevent reuse, only upon confirmation that they were inactive. Active or potentially active dens were flagged and avoidance buffers were established (100 feet for non-natal dens and 500 feet for natal dens, or any active den during the breeding season. Ingress/egress of construction vehicles and equipment through buffers and low intensity activities such as inspections and BMP maintenance within buffers was allowed, provided a qualified biologist determined that these activities would not impact dens or denning animals. Buffers were modified with concurrence of CPUC and BLM, in consultation with CDFW and USFWS. Over the construction period, the following observations and compliance activities occurred:
- In 2018, no American badger, ringtail, or desert kit fox were observed.
  - In 2019, American badger was documented on three occasions, including both tracks and live individuals. No ringtail or desert kit fox were observed within in the project area during the 2019 reporting period.
  - No American badger, ringtail, or desert kit fox were observed during monitoring efforts for the project from 2020 through 2023.



### Cultural Resources:

- **Cultural Resources Monitoring (MM CL 1d).** Archaeological monitoring was conducted by a qualified archaeologist familiar with the types of historic and prehistoric resources that could be encountered within the Project area. Monitoring occurred in all areas of ground-disturbing activity that occur within 100 feet of a cultural resource ESA. As specified in the CRMP, intermittent monitoring occurred in areas of moderate archaeological sensitivity at the discretion of the principal archaeologist, as identified in the CRMP. Monitoring reports were submitted to the CPUC/BLM on a weekly basis. Tribal monitoring also occurred on Morongo Reservation sites within Segment 5.
- **Unanticipated Cultural Resources (MM CL-2a).** In accordance with the CRMP, when unanticipated cultural resources were unearthed during construction, construction in the immediate area of the find was halted and directed away from the discovery until a qualified archaeologist could assess the potential significance of the resource. Once the find had been inspected and a preliminary assessment made, SCE consulted with the CPUC and BLM regarding their evaluation and proposed treatment of the find(s). Unanticipated discoveries were also reported via Daily Incident Summaries. Over the construction period, 23 new resources were discovered, evaluated, and properly treated in accordance with the CRMP.
- **Properly Treat Human Remains (MM CL-2b).** In the event human remains were discovered during construction, MM CL-2b required that all work be diverted from the area of the discovery and CPUC/BLM be informed immediately. If the remains were on federal land, the remains were to be treated in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA). If the remains were not on federal land, the remains were to be treated in accordance with Health and Safety Code Section 7050.5, CEQA Section 15064.5(e), and Public Resources Code Section 5097.98. No human remains were discovered during Project construction.

### Hazards and Hazardous Materials:

- **Hazardous Materials, Waste Management, and Soil Management Plan (MM HH-1a, HH-2a, HH-3a).** During construction, hazardous materials use and storage was managed according to the Hazardous Materials, Waste Management, and Soil Management Plan, including the fueling and maintenance of construction equipment and response procedures in the event of a spill. The Plan also provided guidance on the proper handling, onsite management, and disposal of impacted soil that was encountered during construction activities. Soil sampling was also conducted to identify pesticide/herbicide contamination in areas with current or past agricultural activities. Spill Report Logs were included in the weekly SCE monitoring reports. When a spill occurred, impacted soils were removed and hauled to a material yard for disposal at an SCE approved waste facility.

### Noise:

- **Best Management Practices for Noise (MM N-1a, N-1b).** SCE employed the following noise-control techniques to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:
  - Construction noise was confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule developed by SCE based on its coordination with the local jurisdiction.
  - Unnecessary construction vehicle use and idling time was minimized to the extent feasible.
  - Construction equipment used noise reduction features (e.g., mufflers and engine shrouds).

- Stationary noise sources (e.g., generators, pumps) at staging areas and on the right-of-way within 1,400 feet of sensitive receptors were shielded at the source to the extent feasible (i.e., equipment enclosures, temporary sound walls, or acoustic blankets).
- Construction traffic was routed away from residences and schools, where feasible.
- In accordance with the Helicopter Use Plan, helicopter flight corridors and minimum transit elevations above ground level were established to avoid noise-sensitive receptors on the ground. Helicopter hovering (greater than 15 minutes) within 250 feet of residences in any vertical or horizontal direction was prohibited.

### Paleontological Resources:

- **Paleontological Resources Monitoring (MM PAL-1d).** In accordance with the PRMMP, full-time paleontological monitoring was conducted in construction areas determined to have moderate (PFYC 3a) to very high (PFYC 5) sensitivity. Sediments of unknown (PFYC 3b) sensitivity were also monitored on a part-time basis. Geologic Units with very low (PFYC 1) or low (PFYC 2) sensitivity were not monitored. Monitoring entailed the visual inspection of excavated or graded areas and trench sidewalls. In the event that a paleontological resource was discovered, the paleontological monitor had the authority to temporarily halt the construction equipment around the find until it was assessed for scientific significance and collected. A temporary construction exclusion zone of at least 50 feet was erected around the discovery. SCE reported paleontological discoveries to the CPUC and BLM via Daily Incident Summaries and/or as outlined in the Plan. If indicators of potential microvertebrate fossils were found, screening of a test sample was carried out as outlined in SVP 2010, in accordance with the PRMMP.

### Traffic and Transportation:

- **Construction Transportation (CTP) Plan (MM T-1a).** Per the approved CTP, construction workers parked personal vehicles at yards or designated assembly points and carpooled to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles were required to park within the project right-of-way or approved disturbance areas or on access roads to the maximum extent possible. Parking was not permitted in areas with dry vegetation that could pose a fire hazard.
- **Restrict Lane Closures (MM T-1c).** To minimize traffic congestion and delays during construction, SCE restricted all necessary lane closures or obstructions on major roadways (as designated by applicable County and City General Plans) associated with overhead construction activities to off-peak traffic periods. Unless absolutely necessary, lane closures did not occur between the peak hours of 6:00 and 9:00 a.m. and 3:30 and 6:30 p.m., or as directed in writing by the affected public agency in their encroachment permit.
- **Ensure Pedestrian and Bicycle Circulation and Safety (MM T-1e).** When construction resulted in temporary closures of sidewalks or other pedestrian facilities, the Project provided temporary pedestrian access, through detours or safe areas along the construction zone. Where construction activity resulted in bike route or bike path closures, appropriate detours were established, including the posting of detour signs. Detours and closures required for safe pedestrian and bicycle access through or around the construction areas were identified in the local Traffic Control Plan's required under MM T 1b.
- **Provide Access to Property (MM T-1f).** When construction activities blocked access to a residential property or business, the Project worked with the property owner, tenant, or business owner to provide reasonable alternate access. When construction involved trenching across or in front of the property's point of access and alternative access was not available, temporary steel plates were laid to bridge the trench as needed.

- **Repair Roadways Damaged by Construction Activities (MM T-4a).** When roadways, sidewalks, medians, curbs, shoulders, or other such features were damaged by the construction activities, the damage was repaired and streets restored to their pre-project condition in coordination with each affected jurisdiction. At the end of Project construction, SCE provided CPUC/BLM with confirming documentation that the affected agency coordination and repairs had been completed. All concrete driveways and walkways on Segment 1 between Construction Areas 1X03 through 1X18 were repaired or replaced in August 2021(see Photo 11).
- **Railroad Right-of-Way Work (MM T-5a).** When construction occurred with the Union Pacific Railroad and Burlington Northern Santa Fe Railway rights-of-way, Project construction complied with each company's safety requirements and avoided disruption to rail traffic.
- **Helicopter Use Plan (MM T-7a).** When helicopter use was required during construction, it was conducted in accordance with the Project Helicopter Use Plan which included approved helicopter landing sites and flight paths; the light- and medium-helicopters to be used on the Project; the GPS-based flight tracking system; aviation safety plan, communication plan and risk matrix/job hazard analysis; adherence to FAA congested area plan requirements; and use of traffic control plans for major roadway crossings. Congested Area Plans were submitted to CPUC/BLM. Meetings to review helicopter flight tracks with SCE generally occurred every two weeks. Flight tracks were reviewed to monitor compliance with local jurisdiction construction work hours and sensitive receptor avoidance, including residences, schools, and nesting bird avoidance areas.

#### Visual Resources:

- **Screen Construction Yards (MM VR-1a).** Material yards (see Section 2.2.1) were visually screened using temporary screening fencing. For the Matich Material Yard northern, eastern, and the western fence lines, this requirement was waived after SCE demonstrated that the material yards were located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. In February 2021, SCE requested an exemption from the screening requirement at the Mountain View Material Yard for the southwestern corner of the yard. There is an existing brick wall and screened fence just outside of Barnard's construction yard fence at this location, which screens the yard from public view and the contractor's screening was continuously stolen from this location. This requirement was waived for this section of the yard.
- **Reduce Color Contrast (MM VR-3a).** Where construction created land scars or Project retaining walls were visible from sensitive public viewing locations, disturbed soils and new walls were treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar), as approved by CPUC/BLM. In April 2021, SCE requested and received approval to use Natina to treat walls at the following locations: Construction Areas 2N11 (see Photo 12), 3X31, 3X32, 3X33, 3X36, 3X37, 4X13, and 6N30.
- **Marking of Natural Features (MM VR-5a).** Applying paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose was prohibited during construction. This measure did not apply to temporary marking agents used to identify underground utilities.
- **Minimize Night Lighting (MM VR-7a).** In general, construction avoided night lighting since adherence to local noise ordinances was required. However, there were occasions when night work was necessary as approved by the local agencies. In these cases, the construction requirements of the Night Lighting Management Plan were implementing, including use of: portable truck-mounted lighting, lamps and reflectors that were not visible from beyond the construction site, and lighting that did not cause excessive reflected glare.

- **Minimize Visual Contrast (MM VR-8a).** To minimize the visual contrast of Project features in visually sensitive areas, the following measures were implemented during construction in accordance with the Project Design Plan:
  - Existing vegetation was used to screen graded areas and facilities from public viewing to the extent feasible by feathering and thinning the edges of cleared areas and retaining a representative mix of plant species and sizes.
  - Disturbed areas were blended into the characteristic landscape by replacing soil, brush, rocks, and natural debris over these disturbed areas.
  - Restoration plant species were of a form, color, and texture that blended with the landscape.

### Water Resources:

- **Erosion Control & Water Quality (MM WR-2a).** Prior to site mobilization, SWPPP BMPs were installed and maintained throughout the duration of construction. During construction, erosion control/SWPPP BMPs were inspected to ensure their effectiveness in compliance with the federal and California Construction General Permits. The inspection reports were maintained and kept in their respective SWPPP, kept on site as required by the federal and State Construction General Permits, and made available to the RWQCB, CPUC, BLM, counties, local municipalities, and tribal governments, on request. Locations requiring SWPPP maintenance and status of completion were provided in the SCE weekly reports. Additionally, annual reports were filed in compliance with federal and California Construction General Permit reporting requirements. SWPPPs were updated as necessitated by Project changes.

A site visit between SCE, SWQCB, CDFW, Aspen, Jacobs, and Barnard took place on February 27, 2019 to review specific sites in Segments 3 and 4. The group toured Sites 3X65, 3X55, 4X51, and 4N63, and the access road to Site 3N06. Areas of recent sediment discharges were reviewed as well as sites currently showing signs of erosion. Discussions took place regarding mapping of jurisdictional features, additional measures that could be implemented, particularly along access roads, to minimize erosion and sedimentation, encouraging run off from access roads in frequent intervals, and controlling run on into construction sites. SCE distributed meeting notes and proposed to investigate the feasibility in incorporating the recommended design features to the Project and modifying the MMCRP for consistency with the tolerances afforded by the 401, LSAA, and SWPPP.

### Wildland Fire:

- **Fire Management Plan (MM WF-1a).** During construction, all Project work areas (i.e., demolition, construction, erection, drilling, wire pulling/removal, vegetation clearing, permit-required activities, and any other focused work areas) and vehicles were required to have Fire Management Plan specified shovel, Pulaski, and 5-pound (pd) ABC fire extinguisher available in the event of an emergency. Additionally, welders were required to have one pressurized 20-pd or two 10-pd fire extinguishers and a 5-gallon water tank with water-filled pump, and heavy construction equipment were required to have exhaust spark arrestors and one pressurized 20-pd fire extinguisher. Water trucks were also required which never contained less than 300 gallons of water aboard, even when in route to refill, and were located on or adjacent (within one tower span) to the Project work areas. When a water trailer (water buffalo) was provided, it was located and staged in the immediate work area. At no time was a work site allowed to be without an adequate water supply.

On April 30, 2020, SCE reported the southern phase of static wire was dropped during wreck-out activities between Construction Areas 6N27 and 6N28 spanning Whitewater Canyon. Although the wire was caught on the guard structures erected across Whitewater Canyon, it also fell across a live distribution line, resulting in the ignition of at least three small fires. The construction crew and monitors immediately contained all three fires using fire suppression equipment readily available onsite (see

Photo 13). SCE completed an investigation and on May 12, reported that the static line slipped out of the sock and hit the guard structure which was too far away from the distribution line causing the distribution line to come to the ground and start the fires. Additional guard structure disturbance area was approved under MPR#36 and additional guard structures and rigging were added to the area to protect the distribution line.

## 2.3.2. Non-Compliances during Construction

### 2.3.2.1. Self-Reported

As described in Section 2.3.1, during construction, SCE provided monitors to ensure that construction activities were conducted in accordance with the required mitigation measures, APMs, permit conditions, and plan requirements. SCE developed a system to categorize and report on observed non-compliances as summarized below.

- **Observation and Maintenance Items** (Observation or Level OB) included observed field conditions that did not result in deviation from a Project requirement but may have resulted in a future incident if not addressed. Additionally, Observations were used to capture field issues that were not Project-related, but occur near the Project area (i.e., non-project related dumping of trash, driving outside of approved access routes, etc.). Regarding cultural or paleontological resources, observations involved isolated finds that were either not significant or lack historical information and were not indicative of a potential lack of compliance.
- **Level 1 Non-compliance Incidents** (Minor Incidents or Level 1) are activities that result in a minor deviation from a Project Requirement. Repetitive infractions of a particular Project Requirement can result in subsequent similar incidents being elevated to the next level.
- **Level 2 Non-compliance Incidents** (Moderate Incidents or Level 2) are activities that deviate from Project requirements and result in direct impacts to sensitive resources. Level 2 Non-compliance Incidents can be resolved without a significant delay in construction activities. However, if the problem is not addressed in a timely matter, or conditions continue to worsen, the incident can be elevated to the next level.
- **Level 3 Non-compliance Incidents** (Major Incidents or Level 3) are activities that significantly deviate from or violate Project Requirements and require notification to the regulatory agencies. These incidents require an immediate work stoppage and coordination with the agencies on a course of action.

Table 13 provides a summary of annual incidents by level and type as monitored by SCE and their contractors. There were no non-compliances during construction and monitoring activities in 2023.

**Table 13. SCE/Contractor Self-Reported Non-Compliances Summary**

Non-Compliance Category	Annual Number of Incidents				
	2018	2019	2020	2021	2022
<b>Observations</b>					
Total Observations	47	169	143	57	23
<b>Level 1 Incidents</b>					
Using unapproved work areas/access roads	7	11	7	2	-
Working without monitor present/site clearance	-	6	3	1	-
Working outside of the Plan of the Day (POD)	1	4	-	-	-
Uncovered excavation or pipe	3	2	1	1	-
Working without sufficient water supply	3	-	-	-	-

Non-Compliance Category	Annual Number of Incidents				
	2018	2019	2020	2021	2022
Improper work notifications	-	3	-	-	-
Standing water	-	3	-	-	-
Fugitive dust	2	1	1	-	-
Failure to conduct required inspections	-	2	-	-	-
Offsite sediment discharge	-	2	-	-	-
Trash	-	2	2	-	-
Construction noise violation	1	-	-	-	-
Equipment idling for approximately 20 minutes	1	-	-	-	-
Equipment without Air Quality (AQ) and California Air Resources Board (CARB) stickers	1	-	-	-	-
No secondary containment	1	-	-	-	-
Working outside traffic control	1	-	-	-	-
Improper stockpile management	-	1	-	-	-
Pets onsite	-	1	-	-	-
Speeding	-	1	2	-	-
Unsecured	-	1	-	-	-
Working within a bird nest buffer	-	-	7	2	-
Paleontological Resources – work without a monitor	-	-	-	1	-
Total Level 1 Incidents	21	40	23	6	-
<b>Level 2 Incidents</b>					
Helicopter nest incursions	-	3	-	-	-
Total Level 2 Incidents	0	3	0	0	-
<b>Level 3 Incidents</b>					
None	-	-	-	-	-

### 2.3.2.2. CPUC EM Compliance Monitoring

The CPUC EMs also monitored construction activities to ensure that they were conducted in accordance with the required mitigation measures, APMs, permit conditions, and plan requirements. As the CPUC EMs identified non-compliances, they reported their observations to their SCE/contractor counterpart(s). If the non-compliance was remedied in a timely and effect fashion, the CPUC EM observations were reported in the Monitoring Reports prepared and issued by Aspen. Conversely, if the non-compliance wasn't adequately remedied, CPUC Incidents, Project Memoranda, and/or Non-Compliance Reports were issued depending on the severity of the infraction, consistent with the SCE non-compliance levels (see Section 2.3.2.1). Table 14 summarizes this CPUC EM non-compliance reporting.

**Table 14. CPUC Observations, Incidents, Project Memoranda, and Non-Compliance Reports**

Date	Regulatory Requirement	Phase	Description
<b>CPUC EM OBSERVATIONS</b>			
10-19-17	MM WIL-1b	Devers MY	Observed excessive wind-blown trash along the eastern wall of the Devers MY.
10-26-17	MM VEG-3a	Devers MY	Ground disturbing activities occurring within a drainage feature.

Date	Regulatory Requirement	Phase	Description
11-07-17	MM WF-1a	Distribution, Subtransmission, Telecommunication	Crew working when a Red Flag Warning had been issued for Riverside County; unaware of the severe weather alert.
11-27-17	MM VEG-1a/1c	Distribution, Subtransmission, Telecommunication	Identified drainage not previously delineated and included in SCE's maps or potential impact totals for jurisdictional features.
01-24-18	MM WIL-2a	Devers MY	Damaged desert tortoise exclusionary fencing due to recent rains.
02-23-18	MM WIL-1c	Devers MY	Inadequate effectiveness (numerous gaps) of the newly installed exclusionary bird netting.
03-23-18	MM VEG-1a/1c	Poultry MY	Fence installation crew working outside of approved disturbance limits.
04-16-18	MM WIL-1b	Subtransmission	Uncovered portable water tank.
07-10-18	MM T-1b	Dental and Intern Circuits distribution	Inadequate traffic control during trenching activities associated with the work along Mission Road.
09-11-18	MM N-1a	Segment 4	Small dozer (bobcat) idling for approximately 20 minutes.
09-12-18	MM AQ-1b	Matich MY	Two forklifts without Air Quality Compliance Stickers
	MM WIL-1b SWPPP	Beaumont 2 MY	<ul style="list-style-type: none"> <li>■ Uncovered 2-inch diameter pipe.</li> <li>■ Concrete residue on the ground near some foundation forms.</li> </ul>
09-18-18	SWPPP	Tennessee Relocation subtransmission	<ul style="list-style-type: none"> <li>■ Water truck from the paving operations watering Iowa Street over ID #1038 resulting in discharge into drainage; no BMPs were in place.</li> <li>■ 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.</li> <li>■ Fugitive dust leaving the site at a road shoulder staging area along Iowa Street.</li> <li>■ No work limits delineators were installed to contain crews and equipment into approved work areas.</li> </ul>
	MM AQ-1a MM VEG-1a/1c		
09-18-18	MM WF-1a SWPPP	Segment 4	<ul style="list-style-type: none"> <li>■ Work sites were left without adequate water supply.</li> <li>■ Water truck did not contain the proper hose.</li> <li>■ 4-inch rocks tracked onto San Timoteo Canyon Road.</li> </ul>
09-20-18	MM WF-1a LSAA	Segment 4	<ul style="list-style-type: none"> <li>■ Crew working without the required water supply for fire abatement.</li> <li>■ BMPs present at Site 4N64 were encased in monofilament.</li> </ul>
09-25-18	MM WF-1a	Segment 4	Assembly crews working without all fire abatement requirements.
10-02-18	MM T-1b	Segment 4	Traffic stopped at the access road entrance along San Timoteo Canyon Road as foundation cages were being delivered via flatbed truck with no orange safety cones or flaggers present.
10-11-18	MM VEG-1a/1c	Segment 3	Foundation cages staged outside of approved disturbance limits.
11-01-18	SWPPP	Segment 3	Track out of 4-inch rock onto Palmer Avenue.
11-09-18	MM WIL-1b	Segment 3	Foundation holes within SKR habitat left inadequately covered overnight.
11-15-18	MM AQ-1a	Segment 4	Large dust cloud resulting from helicopter operations.

Date	Regulatory Requirement	Phase	Description
01-11-19	MM WIL-1b	Segment 3	<ul style="list-style-type: none"> <li>■ Identified drainage not previously delineated and included in SCE's maps or potential impact totals for jurisdictional features; drainage determined to not be jurisdictional.</li> <li>■ Equipment delivered uncovered holes.</li> </ul>
02-01-19	APM HYDRO-1 MM VEG-3a	Segment 3	<ul style="list-style-type: none"> <li>■ Access road grading following recent rain events was occurring in various locations raised a concern that the new grading and associated berms could be modifying the natural drainage patterns.</li> <li>■ Grading for road maintenance had affected a defined drainage inlet to the basin which wasn't mapped and avoided.</li> </ul>
02-13-19	MM VEG-3a	Segment 3	Access road grading resulted in the blockage of MacCarthy drains.
03-14-19	MM WIL-1c	Segment 3	Helicopter working less than 300-feet of red-tailed hawk nest #192 without being monitored by a biologist.
04-22-19	LSAA	Devers MY	Observed monofilament netting trash.
05-02-19	MM WIL-1c	Segment 3	Three instances of encroachment into nesting bird buffers were identified during helicopter construction activities.
05-28-19	MM WIL-1c	Segment 2	Construction personnel parked within active nest buffers.
06-04-19	SWPPP	Segment 1	Track-out from Construction Area 1X18 starting to build-up on the sidewalk exit to Redlands Boulevard.
06-12-19	MM VEG-1a/1c	Segment 6	Project vehicle parked outside of any approved disturbance areas.
07-24-19	SWPPP	Segment 1	Several construction entrances in need of maintenance.
08-08-19	SWPPP	Segment 2	Track-out onto Richardson Street from Project access road.
10-12-20	MM-AQ-1a	Segment 4	Fugitive dust resulting from helicopter operations.
01-14-21	SWPPP	Segment 1	Track-out from Construction Area 1X20 starting to build-up onto Business Center Drive.
02-17-21	SWPPP	Segment 1	Track-out from Construction Area 1X19 starting to build-up onto Redlands Boulevard.
<b>INCIDENTS</b>			
<b>Level 1</b>			
01 30 18	MM T-1b	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.
04 19 18	MM WIL-1b	Timoteo/Tennessee Relocation	A portable water tank was observed uncovered for four consecutive days.
5 24 18	MM VEG-1a/1c	El Casco Substation	Equipment was staged outside of approved disturbance limits for at least 1 2 days.
8 15 18	MM AQ 1a	Banning Connection	Fugitive dust observed from construction activities.
8 15 18	MM WIL 1b	Banning Connection	Use of unapproved access road.
8 15 18	MM WIL 1b	Banning Connection	Use of unapproved staging area.
8 15 18	MPR #16	Banning Connection	SWRCB approved HDD Plan not provided prior to HDD activities.
9-18-18	MM WIL-1a	Segment 4	Lack of adequate fire abatement equipment at 3 locations.
9-20-18	MM WIL-1a	Segment 4	Lack of adequate fire abatement equipment
10-17-18	MM HH-1a	Segment 4	Lack of proper secondary containment for 4 pieces of equipment.
10-17-18	MM N-1a	Segment 4	Work outside of approved hours



Date	Regulatory Requirement	Phase	Description
10-18-18	MM WIL-1b	Grand Terrace MY	Lack of proper covering for pipes between 1.5" to 4"
10-18-18	MM N-1a	Segment 4	Work outside of approved hours
10-30-18	MM AQ-1a	Grand Terrace MY	Fugitive dust emissions outside of property boundaries.
01-24-19	MM WIL-1b	Segment 3	Pipes/tubing left open at Sites 3X08 and 3X10.
02-12-19	SWPPP MM WR-2a	Segment 3	Offsite sediment discharge into a jurisdictional feature.
02-12-19	MM AQ-1a	Segment 3	Fugitive dust along Segment 3 access road to 3X06.
09 25 19	SWPPP	Segment 6	The disposal of slurry at tower sites in Segment 6.
10 22 19	SWPPP	Devers, Matich, and Poultry MY	Improper storage of treated wood poles.
12-06-19	VEG-1c	Segment 2	Materials staged outside of approved work limits just north of M4-T3.
03-16-20	MMCRP	Segment 5	Material and equipment staged outside of approved disturbance areas between Construction Areas 5X28 and 5X29.
05-11-20	WIL-1C	Segment 4	Tower assembly within 150 feet of an active common raven nest and an expired nest buffer reduction at Construction Area 4X24.
08-06-20	WIL-1b	Poultry MY	Several piles of construction pipes were observed uncovered within the Poultry MY.
10-27-20	MMCRP	Segments 3 and 4	Construction vehicles and equipment outside approved construction areas at Construction Area 4X45 and between Construction Areas 3X26 and 3X27.
<b>Level 2</b>			
02-13-19	VEG-3a	Segment 3	Offsite sediment discharge from access road into JD ID 3054.

### 2.3.3. Safety Incidents

As required by the MMCRP, SCE was required to report on health and safety incidents consistent with the "self-identified potential violation" requirements of the CPUC's Safety Citation Program and the Accident Reporting Requirements. Specific types of health and safety incidents to be reported under these programs include:

- A potential violation that poses a significant safety threat to the public and/or utility staff, contractors, or subcontractors.
- Any instance of fraud, sabotage, falsification of records and/or any other instances of deception by SCE's personnel, contractors, or subcontractors, that caused or could have caused a potential violation, regardless of the outcome.
- Incidents that (a) result in fatality or personal injury rising to the level of in-patient hospitalization and attributable or allegedly attributable to utility owned facilities; or (b) are the subject of significant public attention or media coverage and are attributable or allegedly attributable to utility facilities; (c) involve damage to property of the utility or others estimated to exceed \$20,000 that are attributable or allegedly attributable to utility owned facilities.

Unanticipated events occurred that had the potential to impact project personnel and/or public safety. While these events did not result in a deviation from or violation of a mitigation measure or permit condition, it was important that these events be reported to the appropriate agencies and the CPUC, so they were in a position to respond to questions or concerns from the public or managers. Accordingly, the

SCE EPM immediately reported these events to the Aspen/CPUC PM and to other regulatory agencies, as appropriate which were followed up with final electronic notification characterizing the event, actions taken, and outcomes. Potential safety incidents during construction that were reported on by SCE, included the following:

- SCE reported two helicopter-related safety incidents on January 15, both which occurring on January 14, 2019. Both incidents occurred during conductor removal and involved mechanical failure of rigging used for conductor removal. Guard structures and traffic control were in place and no injuries or resource damage took place in either incident. Barnard and SCE implemented a safety shutdown for all conductor removal helicopter activities until an investigation could be completed. Because of the potential risk to public safety, the CPUC reviewed incident reports and safety analysis reports, and authorized all helicopter activity to resume with all corrective actions and appropriate equipment in place.
- On February 7, 2019, a concrete truck traveling the access road to Site 3X06 slid slightly off the road becoming temporarily stuck.
- On February 12, 2019, a crane slid off the project roadway (not public) into a bank of a jurisdictional drainage. The crane driver wasn't hurt.
- On March 15, 2019, a triple helix anchor that was securing the conductor after a wire pull the previous day failed, causing wire to drop from 3X55 to 3X65. As a result of this wire drop it inadvertently caused the granny smith 12 kV line to relay causing a temporary circuit interruption. The wire dropped between 9 spans of wire, and the circuit interruption was between Construction Areas 3X57 & 3X59 at Cypress Way and Pilgrim Road in Redlands, an unimproved road. All crossings were rendered safe within minutes of this hardware failure. The contractor flew the line to get a close look at all crossings and mobilized crews to these locations. Crossing guards held up the conductor at all crossings with the belly of the wire to fall on vegetation with the span sites. The line was secured back up into position. There were no injuries.
- On June 4, 2019, at approximately 10:25am, while positioned on the tower, a crew was removing structure M0-T3 at Construction Area 1X26 when the crane had an apparent mechanical malfunction which resulted in the crane boom lowering (out of operator control). The malfunction occurred when the upper section of the tower came free and swung out of plumb of the crane causing the upper section of the structure and the boom to make contact with the lower section of the structure. The operator brought the section to the ground when control of the crane was regained. No injuries or property damage occurred as a result of the incident. A stand down was performed the following day to discuss the event.
- On August 15, 2019, while stringing across Whitewater Canyon, the static wire dropped during pullback between Construction Areas 6X27 and 6X28 causing interruption of the local distribution circuit. The distribution circuit was immediately restored.
- On August 16, 2019, while installing travelers on an existing H-frame, the arm broke. The traveler line never touched the ground and there were no impacts or injuries.
- On November 3, 2019, at Construction Area 6S30, a rigging failure occurred resulting in the double bundle conductor and block contacting the ground. No injuries or damage to equipment resulted. Crews were not performing any aerial work at the time.
- On January 21, 2020, SCE reported that at approximately 2:00 pm, a helicopter was pulling rope mid span between Construction areas 2N01 and 2N02 when the rope got caught in a traveler. When the rope was released it came back towards the helicopter. The pilot immediately released the rope to prevent contact with the helicopter rotors. No injuries or resource damage occurred.

- On April 30, 2020, SCE reported the southern phase of static wire was dropped during wire wreck-out activities between Construction Areas 6N27 and 6N28 on Segment 6, spanning Whitewater Canyon. Although the wire was caught on the guard structures erected across Whitewater Canyon, it also fell across a live distribution line, resulting in the ignition of at least three small fires. The construction crew and monitors immediately contained all three fires using fire suppression equipment readily available onsite. SCE completed an investigation and on May 12, reported that the static line slipped out of the sock and hit the guard structure which was too far away from the distribution line causing the distribution line to come to the ground and start the fires. Additional guard structure disturbance area was approved under MPR #36 and additional guard structures and rigging were added to the area to protect the line.
- On June 1, 2020, the southern phase of double conductor wire was dropped during wire stringing activities between Construction Areas 6X42 and 6S41 about 40 feet west of the adjoining access road and a jurisdictional waterway. The wires were removed from the ground using a V-groove machine by dragging the wire back into the work area. The incident resulted in only minor impacts to an area of desert/alluvial scrub. Impacts were limited to broken branches on creosote and brittlebush. The line depressions were swept after the wire was removed. The incident was documented by SCE as a level 1.
- On June 3, 2020, an underground water pipe was struck during foundation removal activities at Tower M67-T3 within Construction Area M7-T3. Work activities were immediately halted, and Mission Springs Water District was notified and remedied the issue onsite with the crew. Potable water was observed flowing from Construction Area M7-T3 to the east, along the northern access road, to the north end of the Construction Area 6X45, where water passed through properly maintained BMPs. The south flow of potable water had trickled south into an ephemeral jurisdiction waterway located within the construction limits of Construction Area 6X45. The biologist determined that the water did not leave the construction limits of Construction Area 6X45 and did not observe any impacts to vegetation, wildlife, or biological resources. SCE documented the issue as an observation.
- On August 21, 2020 the lead rope used to install the optical ground wire (OPGW) along the northern phase failed, resulting in approximately 5000 feet of rope falling to the ground outside of approved work areas between Construction Areas 6N26 and 6N28 (see Photo 7). Crews used a boom truck and forklift staged at Construction Areas GS-6N27-6N28-2 and 6N28 to pull the rope back within approved work limits. After the rope was fully retrieved, an impact survey was conducted by project biologists and SCE issued a level 1 incident. Due to the light weight of the rope, the incident resulted in very minimal impacts to vegetation, a few minor marks in the soil, and no discernible impact to wildlife.
- On April 13, 2021, a guard pole structure failed due to excessive high winds and damaged a nearby utility on Segment 6. SCE made the necessary notifications and repairs, and no injuries were reported, and no sensitive resources were impacted. In response, contractor inspection of guard poles increased for the duration of the project.
- On May 27, 2021, an unmarked water line (property of SCE) was struck and damaged during foundation wreck-out at Construction Area M0-T2(1) on Segment 6 just outside of the Devers Substation. Once the site was secured crews began to dewater the excavated area. Notifications were made to the Water District and the repairs were completed within 24 hours.

#### **2.3.4. Public Complaints**

At times, the public took issue with one or more aspects of the Project. As required by the MMCRP, the contractor maintained a Project Information Line during construction and assigned a dedicated Public Liaison to the Project that was responsible for tracking and handling public complaints. Public complaints were also submitted formally to SCE and CPUC through email or the Project Information Line. Members of the public that had questions, concerns, or complaints on the Project were directed to the SCE Public

Affairs Manager and Project Information Line, and contact information was supplied as requested. Complainants who approach field personnel at the Project site were referred to the Project Information Line to formally submit their complaint. SCE worked with the CPUC on best practices for handling public complaints that were received. The Public Liaison responded to public complaints within 24 hours upon receipt. CPUC notified SCE of public complaints received by the CPUC to facilitate SCE's timely response to these complaints and SCE added these to the electronic complaint log. SCE made every reasonable effort to work with members of the public and correct actions leading to complaints, as feasible.

SCE also provided monthly summaries of the public complaints and how each complaint was addressed. The Aspen/CPUC PM coordinated with the SCE EPM on the adequacy of corrective actions or additional measures that were implemented, as needed.

### 2.3.5. Final Inspection

Final inspections of WOD Project areas were conducted by the CPUC monitor as each area was closed out for construction. The CPUC monitor inspected for any trash, construction materials, or signage that may have been left onsite. Any issues observed were immediately conveyed to the SCE Field Contact Representatives.

## 2.4. Post-Construction Compliance

Many mitigation measures and permit conditions required activities be performed at the completion of construction. These activities are described below.

### Agricultural Lands:

- **Confirm Agreements with Agricultural Landowners Implemented (MM AG-3a).** If damage or destruction occurred on agricultural lands, SCE was required to perform restoration activities to return the disturbed area to a pre-determined condition or the pre-construction condition, whichever option was agreed upon by the landowner and SCE and in accordance with the existing easement language. This included activities such as soil preparation, regrading, and reseeding.

### Biological Resources:

Temporary disturbance areas were restored in accordance with MM VEG-1d (see below) and permanent disturbance areas were restored in accordance with MM VEG-1e as described in Section 2.1.3 above.

- **Habitat Restoration and Revegetation Plan (HRRP) (MM VEG-1d).** The HRRP outlined the restoration of all temporary disturbance areas in agriculture, developed/disturbed, and most grassland/forbland (excluding suitable Stephens' kangaroo rat habitat and any areas with 10 percent or greater relative cover of native perennial grass species), and temporary disturbance areas that cannot be effectively revegetated and are therefore subject to off-site compensation (Mitigation Measure VEG 1e). The overall goals of the HRRP for these temporary disturbance areas was to minimize weed invasion, dust generation, and soil erosion.

The HRRP also addressed revegetation of temporary disturbances in grassland/forbland that is either suitable Stephens' kangaroo rat habitat, or has 10 percent or greater relative cover of native perennial grass species (see VEG 1c), and in all other vegetation types (alluvial scrub, coast live oak woodland, coastal sage scrub, chaparral, desert scrub, riparian woodland, and aeolian sand). For these habitat types, the HRRP identified the habitat values present prior to disturbance (i.e., native plant species cover, habitat structure, and soil or substrate conditions), as well performance standards that needed to be met for successful revegetation.

As construction was completed in a given area, the HRRP restoration and revegetation requirements were implemented based on the habitat value prior to construction. For all revegetation or restoration areas, SCE provided annual reports to the CPUC/BLM verifying the total vegetation acreage subject to temporary disturbance, identifying which items of the HRRP have been completed, and which items are still outstanding. Annual monitoring reports included a summary of the reclamation, revegetation, or restoration activities for the year, a discussion of whether performance standards for the year were met, any remedial actions conducted and recommendations for remedial action, if warranted, that were planned for the upcoming year.

- The initial 2018/2019 planting season 1 (PS1) included restoration sites at Construction Areas 4N59, 4N60, 4N61, 4N62, and 4N63. A total of approximately one acre of temporary disturbance area was monitored during Year-1 across each of the five restoration sites. Hydroseeding was the method employed to reseed the restoration areas. After decompaction and application of salvaged topsoil (sites 4N59 and 4N63), the restoration area soil was moistened to allow the seed to stick to the soil surface. Hydroseed mixture (seed, water, tackifier and mulch) was then applied across the site. Maintenance and weed control activities required by the HRRP were performed during the 2018-2019 execution period and 2019-2020 growing season including watering, weed and erosion control, and trash and debris removal. With the exception of 4N59, all restoration sites met the long term (5-year) performance criterion for absolute native cover during Year-1. Sites 4N61 and 4N62 met the long term (5-year) performance criterion for relative native cover of 80 percent or higher. In addition, sites 4N60, 4N61, and 4N62 had zero native cover prior to disturbance and therefore have higher native cover post-restoration than pre-disturbance. Site 4N63 had a woody stem density higher than the 5-year criterion. Sampling at 4N59 did not detect woody species; however, 10 of 11 acorn planting locations have live oak (*Quercus agrifolia*) seedlings, indicating this site is on a trajectory to successfully meeting the success criterion.
- The 2019/2020 planting season, or planting season 2 (PS2), included restoration sites at Construction Areas 2N32, 3N03, 3N04, 3X10, 3X12, 3X14/PP#123266, 3X17, 3X20, 3X21, 3X23, 3X25, 3X26, 3X27, 3X33, 3X37 (partially seeded), 3X40, and 3X43. A total of approximately 2.65 acres of temporary disturbance area was monitored during year-1 for PS2 across each of the seventeen restoration sites. As described above in the initial 2018/2019 planting season, PS2 restoration sites were contour-graded as close as possible to the pre-impact condition prior to implementation of restoration activities. Topsoil was salvaged at sites 3N04, 3X12, 3X14/PP#123266, 3X20, 3X21, 3X23, 3X25, 3X27, and 3X43; the finished grade was scarified, and the salvaged soil was spread over the restoration area and left in a roughened condition prior to seeding. Maintenance and weed control activities required by the HRRP were performed during the 2019-2020 execution period and 2020-2021 growing season including watering and weed and erosion control. Due to the late seeding date (many sites were seeded outside the typical fall/winter planting period), irrigation was used to supplement soil moisture at restoration sites. The RC used a water truck to provide watering via overhead spray once or twice per month, depending on weather. All sites were on track to meet the long term (5-year) performance criterion for absolute native cover. Four sites met the long term (5-year) performance criterion for relative native cover of 80 percent or higher. In addition, six sites (3X10, 3X14, 3X17, 3X25, 3X33, and 3X40) had low to no native cover prior to disturbance and therefore have higher native cover post-restoration than pre-disturbance. With the exception of 2N32, all sites with woody vegetation communities had a woody stem density higher than the 5-year criterion. Relative non-native cover remained high at many restoration sites despite weeding activities; however, the current composition of native and non-native plants was a measurable improvement from pre-disturbance conditions as none of the restoration sites had non-native relative cover less than 22% pre-disturbance, and many were close to 100% non-native relative cover.

- The 2020/2021 planting season, or Planting Season 3 (PS3) included remaining restoration sites in Segments 2, 3, 5, and 6. As in previous years, PS3 restoration sites were contour-graded as close as possible to the pre-impact condition prior to implementation of restoration activities. After decompaction and application of salvaged topsoil, approved native seed mixes were applied to restoration areas using the hydroseeding method. Maintenance and weed control activities required by the HRRP were performed during the 2020-2021 execution period (i.e., PS3) and 2021-2022 growing season by the RC and RE, including watering, weed and erosion control, and trash and debris removal. Annual monitoring demonstrated that, during PS3, high relative cover of non-native plants and invasive weeds was a general trend among restoration sites, both pre- and post-disturbance. Continued weed control activities was recommended to keep relative maximum non-native cover below 20 percent to ensure that restoration areas continued on a trajectory that is suitable for meeting long term performance goals at the end of the 5-year monitoring period.
- The 2021/2022 planting season, or Planting Season 4 (PS4) was the final season of restoration for restoration sites in Segments 2, 3, 4, 5, and 6. As in previous years, PS4 restoration sites were contour-graded as close as possible to the pre-impact condition prior to implementation of restoration activities. After decompaction and application of salvaged topsoil, approved native seed mixes were applied to restoration areas using the hydroseeding method. Maintenance and weed control activities required by the HRRP were performed during the 2021-2022 execution period (i.e., PS4) and 2022-2023 growing season by the RC and RE, including watering, weed and erosion control, and trash and debris removal. Remedial planting (reseeded) also occurred at restoration site WSS-6-6X34-1-MPR-29 (T238). Annual monitoring demonstrated that, during PS3, high relative cover of non-native plants and invasive weeds was a general trend among restoration sites, both pre- and post-disturbance. Continued weed control activities was recommended to keep relative maximum non-native cover below 20 percent to ensure that restoration areas continued on a trajectory that is suitable for meeting long term performance goals at the end of the 5-year monitoring period.

On August 3, 2021, SCE submitted MPR #51 to exclude 102 Project construction areas across all Segments from the 5-year restoration success criteria in the HRRP. Additional information was provided by SCE on October 6, 2021, which reduced the number of requested sites to 95 Project work areas. The requested sites are located in Segments 2-6 in San Bernardino and Riverside Counties; Segment 1 sites were eliminated from the original request. The requested was granted on October 22, 2021 with the conditions SCE provide all shapefiles for the requested sites and provide acreage calculations and compensate for any habitat removed from the restoration program.

SCE's contractor continued restoration maintenance and monitoring of each site until receiving SCE sign-off, with the latest sign-off accepted by SCE on March 14, 2023. Erosion repairs were completed at 12 sites originally included in the project restoration effort. These sites required erosion repairs due to erosion that had occurred from storm damage along the project ROW after structure construction had been completed. The sites were stabilized with tackifier and a general seed mix that had been previously used along the ROW by Barnard. SCE agreed to assume responsibility for restoration execution and monitoring at these erosion sites upon the completion of the erosion work and stabilization of the sites. Restoration activities for the remaining restoration sites, specifically weeding and watering of these sites, were temporarily halted in July 2022 but resumed on November 1, 2022. No field work, including surveys and monitoring of the restoration activities, occurred during the hiatus.

On November 1, 2023, SCE submitted MPR #55 to update the habitat restoration success criteria in the HRRP. Specifically, the success criteria listed in HRRP Section 4.2.2 and IWMP Section 4.3.2 referring to relative amounts of native and non-native cover within a given restoration area. The goal was deemed unachievable, given that pre-construction site conditions exceeded the criteria, high levels of ambient weed levels of surrounding areas influenced the restoration sites, and the sites cannot support the maximum density of native plants required to meet the criteria. The request was granted on

November 20, 2023 with no additional conditions as the proposed change in the HRRP success criterion will not result in any additional impacts.

- **Minimize Native Vegetation and Habitat Loss (MM VEG-1c).** Estimated Project construction disturbance acreages by land cover type and year are presented in Table 15. Note that acreages were mapped using GIS and acreage totals include BLM, San Bernardino County, Morongo Reservation, and Western Riverside and Coachella Valley MSHCPs lands. Restoration requirements were dependent upon whether temporary or permanent, and disturbance location as described above.

Estimated disturbance to project-covered listed species (i.e., CAGN, DETO, LBVI, SWFL, and SKR) habitats resulting from construction is provided in Table 16 by year. These estimates were determined using GIS analyses that calculated the disturbance areas, based on most recent engineering design data and any changes in mapped vegetation/habitat, of active construction sites on an annual basis.

On completion of project construction, SCE provided CPUC and BLM with GIS shapefiles of all actual temporary and permanent disturbance areas, accurate aerial imagery of the project area, and summary data of all discrepancies between final engineering and “as-built” conditions for each vegetation or habitat type, within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP, reservation, and BLM). Final Project impact totals for both land cover and covered listed species habitat are included in Tables 15 and 16, respectively.

**Table 15. Estimated Yearly and Final Project Land Cover Impacts**

Land Cover Type	2018 (acres)		2019 (acres)		2020 (acres)		2021 (acres)		Final Project Impacts (acres)	
	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm
Agriculture	54.76	2.98	58.68	3.05	63.08	3.05	56.33	2.84	26.17	2.24
Alluvial Scrub	0.64	-	13.31	1.12	13.27	1.12	21.24	2.8	2.64	1.09
Chaparral	18.06	2.83	23.47	3.22	21.44	3.03	21.24	0.15	6.28	2.47
Coast Live Oak	0.40	0.08	0.45	0.11	0.15	0.10	0.15	0.10	0.25	0.10
Woodland										
Coastal Sage Scrub	42.30	5.02	46.24	5.46	61.97	5.42	24.67	3.7	7.36	4.41
Desert Scrub	-	-	263.18	26.41	270.73	26.43	118.73	17.94	63.10	24.30
Developed/ Disturbed	157.16	20.48	351.04	38.42	372.23	38.21	261.18	29.65	120.38	33.18
Grassland/ Forbland	125.31	10.05	207.59	23.61	230.83	22.79	170.99	19.75	41.04	20.63
Riparian Woodland	0.50	0.14	1.38	0.28	1.18	0.17	1.20	0.17	0.70	0.43
<b>Estimated Totals</b>	<b>399.13</b>	<b>41.58</b>	<b>965.34</b>	<b>101.69</b>	<b>1034.88</b>	<b>100.34</b>	<b>661.76</b>	<b>78.07</b>	<b>267.92</b>	<b>88.85</b>

**Table 16. Estimated Yearly and Final Project Covered Listed Species Habitat Impacts**

Habitat Type	2018 (acres)		2019 (acres)		2020 (acres)		2021 (acres)		Final Project Impacts (acres)	
	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm
CAGN Critical	25.88	3.78	21.86	5.30	40.44	5.31	33.90	4.69	9.46	3.84
CAGN Occupied	-	-	1.01	-	1.01	-	0.14	-	-	-
CAGN Suitable	12.43	2.53	8.98	2.83	14.99	2.83	7.73	1.55	2.75	2.3
CVMV Critical	-	-	6.22	-	3.90	-	2.90	-	-	-
CVMV Modeled	-	-	42.90	5.08	47.62	5.13	36.19	3.87	16.00	4.44
DETO Modeled	-	-	246.31	26.56	260.94	26.62	149.78	22.71	78.12	23.56
LBVI Occupied	-	-	1.77	0.40	1.74	0.40	0.38	0.24	0.08	0.27
LBVI Suitable	-	-	0.95	0.20	0.95	0.20	0.95	0.20	0.26	0.19

Habitat Type	2018 (acres)		2019 (acres)		2020 (acres)		2021 (acres)		Final Project Impacts (acres)	
	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm
SKR Suitable	92.46	11.47	128.66	17.08	146.92	16.41	110.08	14.53	29.51	14.10
SWFL Suitable	-	-	2.72	0.60	2.69	0.60	1.33	0.43	0.34	0.47
<b>Estimated Totals</b>	<b>130.77</b>	<b>17.78</b>	<b>461.40</b>	<b>58.05</b>	<b>521.20</b>	<b>57.50</b>	<b>343.39</b>	<b>48.22</b>	<b>136.52</b>	<b>49.18</b>

### Cultural Resources:

- **Cultural Resource Management Plan (CRMP) (MM CR-1b).** CRMP included provisions for analysis of data in a regional context, reporting of results within one year of completion of field studies, curation of artifacts (except from private land) and data (maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by BLM, and dissemination of reports to local and State repositories, libraries, and interested professionals. The BLM will retain ownership of artifacts collected from BLM managed lands.

### Geotechnical:

- **Foundation Design (MM G-5a).** SCE provided letters signed by a California registered geotechnical engineer following the completion date of all of the foundation activities for each segment. The letters confirmed that SCE followed the geotechnical report recommendations and the common engineering practice in southern California at the time of the project.

### Paleontological Resources:

- **Final Reporting and Curation (MM PAL-1e).** At the conclusion of laboratory work and museum curation, a final report was prepared describing the results of the paleontological monitoring efforts associated with the project. The report includes a summary of the field and laboratory methods, an overview of the Proposed Project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository.

All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all analyses are completed. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Applicant.

### Transportation:

- **Repair Roadways Damaged by Construction Activities (MM T-4a).** At the end of major construction, SCE coordinated with each affected jurisdiction to confirm what repairs were required. Any damage was repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE provided CPUC and BLM confirming documentation when the coordination and repairs had been completed.

### Water Resources:

- **Implement flood, erosion, and scour protection for aboveground and belowground improvements (MM WR-3a).** SCE shall evaluate and conform to NPDES MS4 Phase I and II requirements for post-construction BMPs and, in consultation with San Bernardino and Riverside Counties and applicable local



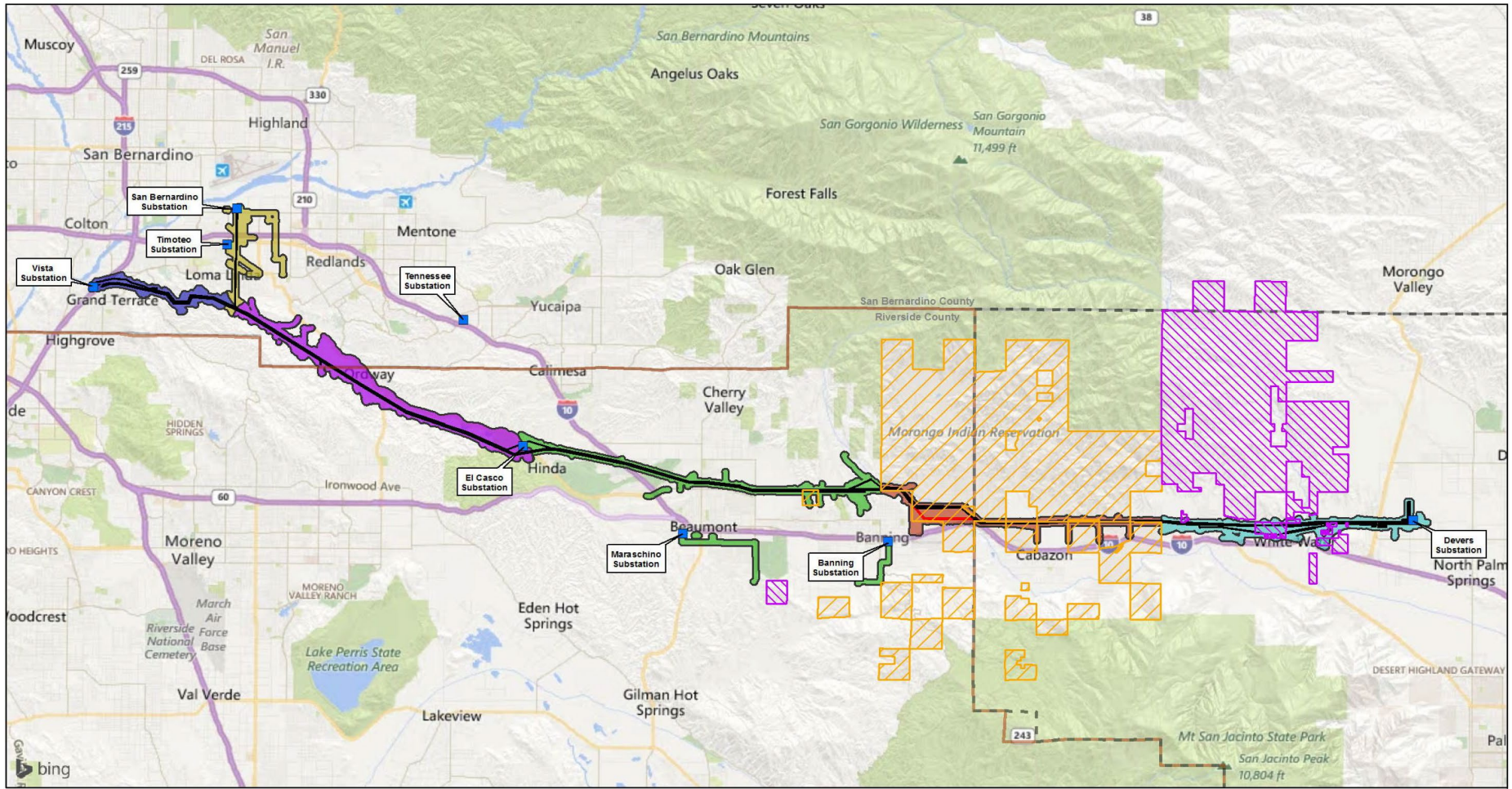
jurisdictions and agencies, prepare or conform to existing Water Quality Management Plans where determined necessary. When construction activities were completed, SCE was required to demonstrate there was no potential for further construction-related storm water pollution, that all elements of the SWPPP had been completed, construction materials and waste were properly disposed, and the sites were in compliance with all local storm water management requirements. The final SWPPP Notice of Termination was approved for all 3 project SWPPPs by the Colorado River Water Board on August 9, 2022.

### **Utilities and Public Service:**

- **Protection of pipelines and overhead and underground utilities (MM UPS-2a).** SCE shall perform engineering studies to determine whether and what cathodic protection would be required on pipelines potentially affected and submit to the CPUC and BLM written documentation of coordination with all pipeline and utility owners with facilities in the vicinity of planned construction and evidence that the project meets all applicable local requirements. Coordination with Southern California Gas and Electric resulted in areas requiring cathodic protection within the ROW. SCE provided confirmation Southern California Gas and Electric agreed to complete the required work.

**Attachment 1**  
**PROJECT OVERVIEW AND STUDY AREA**

SCE WOD TRANSMISSION LINE UPGRADE PROJECT



**SOUTHERN CALIFORNIA EDISON**  
AN EDISON INTERNATIONAL COMPANY

**LEGEND**

- Project Study Area
- Existing Transmission Line Right of Way
- Proposed Right of Way
- Substation
- Segment 1
- Segment 2
- Segment 3
- Segment 4
- Segment 5
- Segment 6
- U.S. Bureau of Land Management
- Morongo Reservation
- Western Riverside County MSHCP
- Coachella Valley MSHCP

Source: SCE, Bing Maps  
C:\WOD\GALT\WodMapFiles\Plans\NTPR\_Transmission\_2017-05-06\Fig1-1\_WOD\_NTPR\_Transmission\_Overview\_2017-06-21\_FINAL.mxd (6/21/2017)



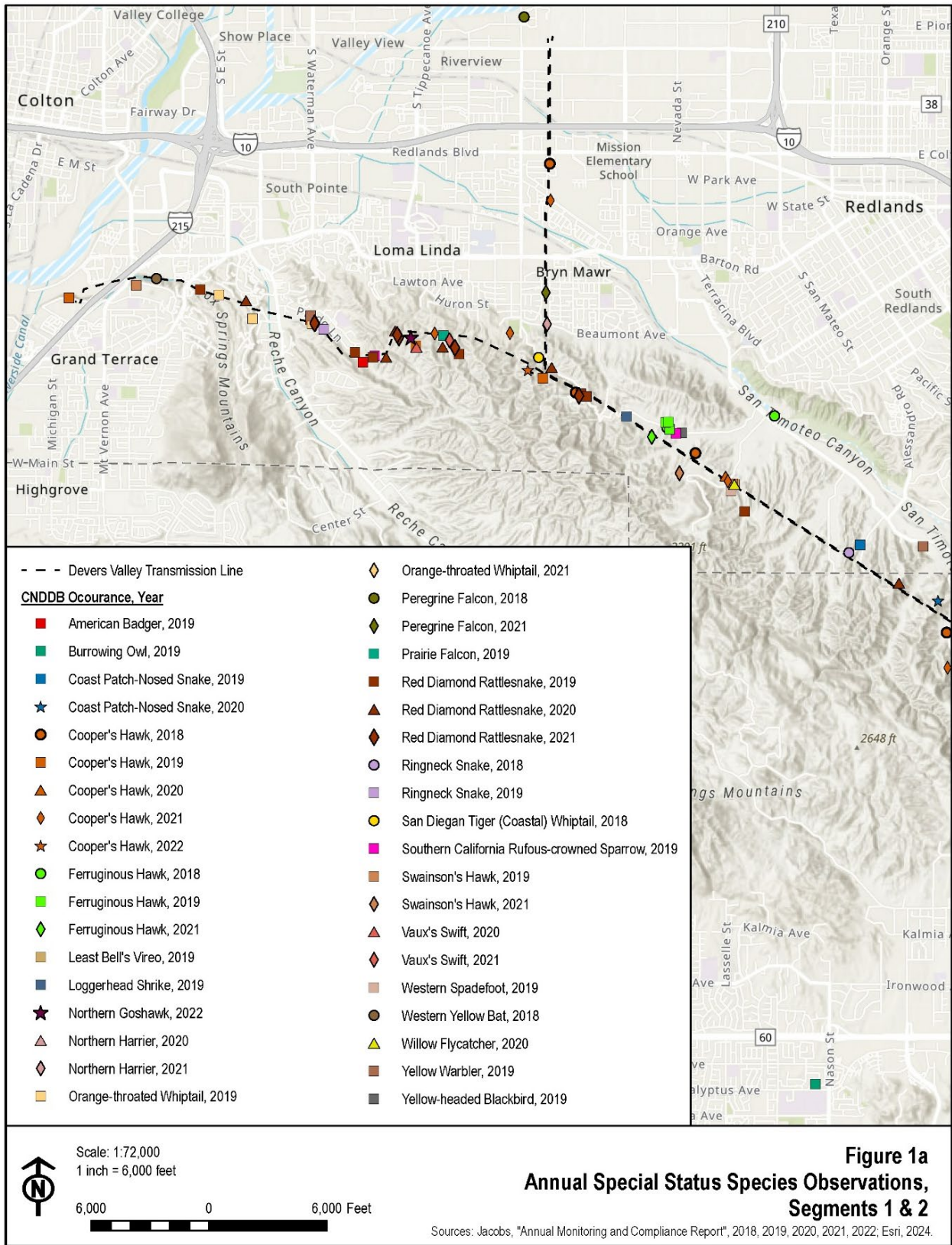
FIGURE 1-1

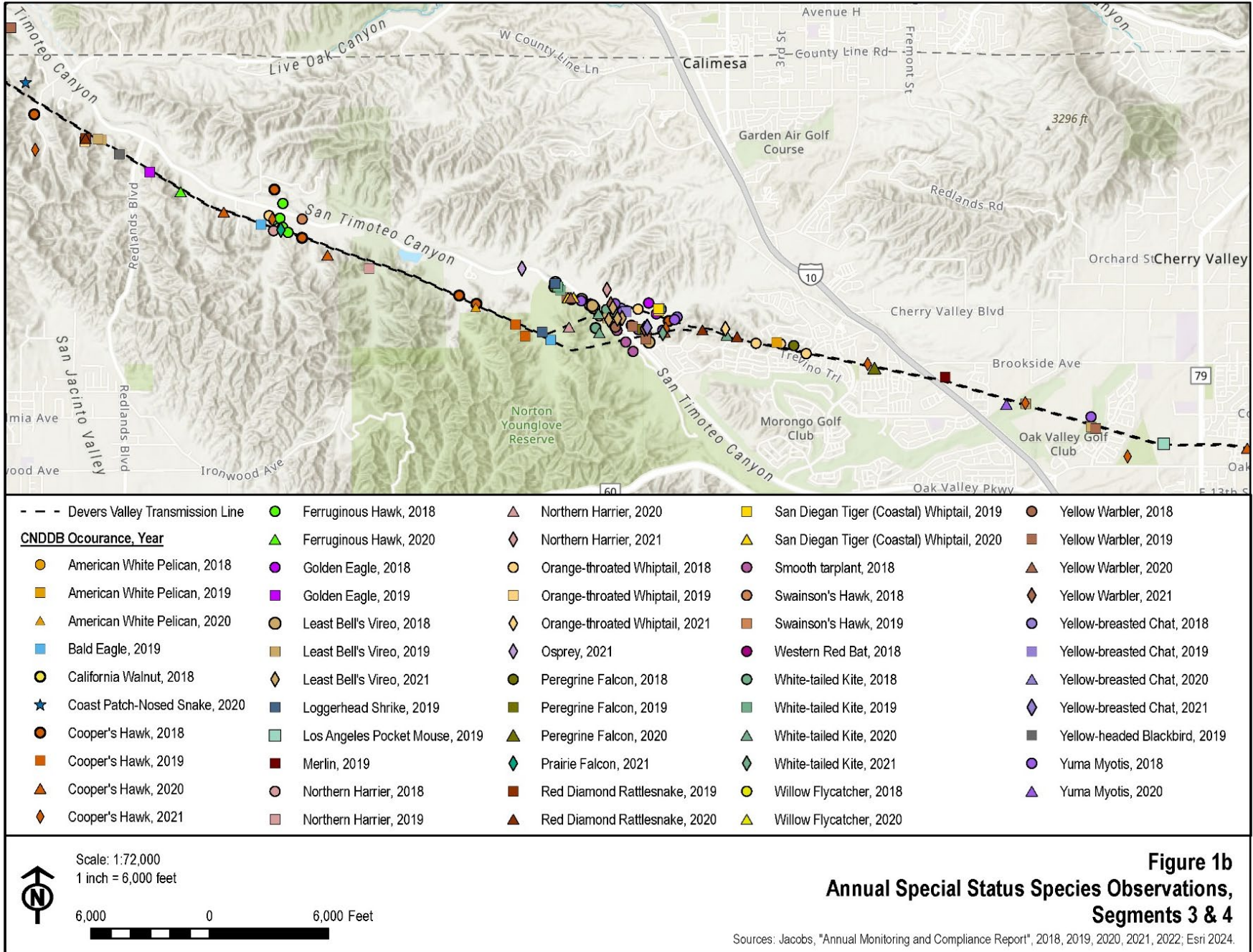
Southern California Edison  
West of Devers Upgrade Project  
Project Overview and Study Area  
NTPR Transmission



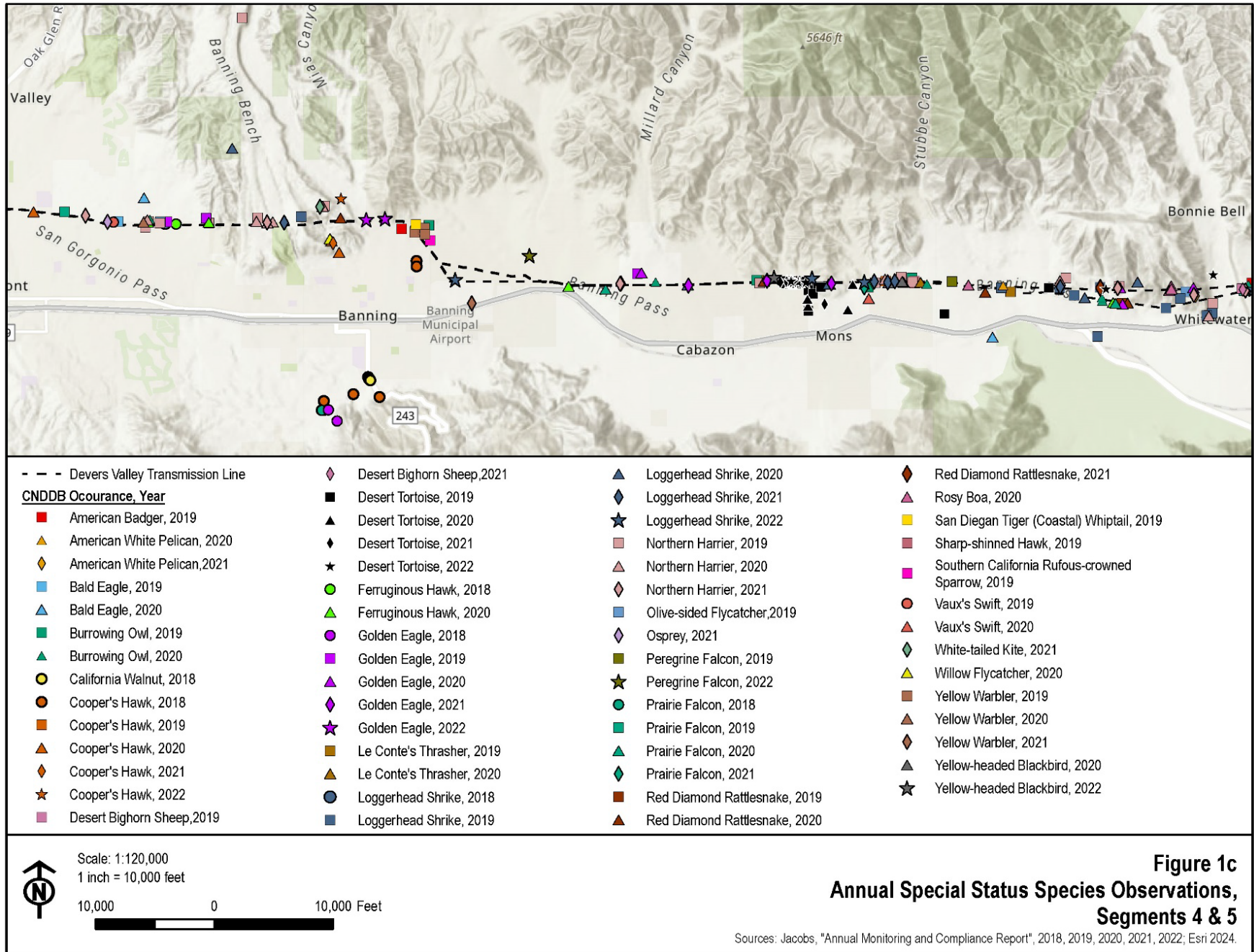
**Attachment 2**  
**CNDDDB FIGURES**

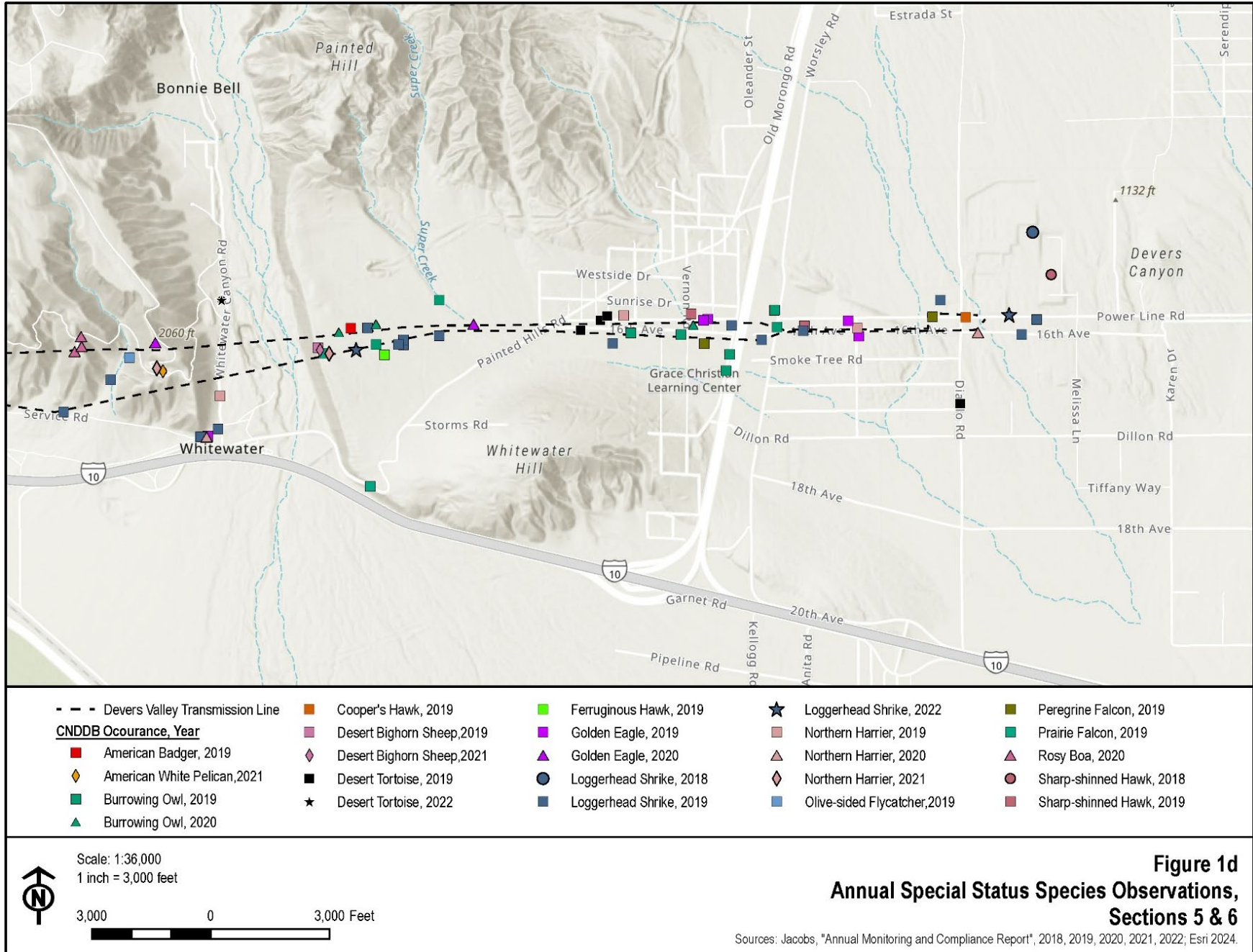














## **Attachment 3**

### **PHOTO LOG**



Photo 1. Installing privacy screening around perimeter of Poultry MY (April 4, 2018)



Photo 2. Crews working at bus position #7 at El Casco Substation (March 27, 2018)



Photo 3. SCE crew splicing fiber along Wesley Avenue (March 26, 2018)



Photo 4. Vegetation removal occurring at Site 1X12-1X13 along Segment 1 (August 28, 2018)





Photo 5. Grading and drilling occurred in Segment 2 (April 24, 2019)



Photo 6. Sediment deposits from water line break at 2N30 prior to clean-up (July 11, 2019)



Photo 7. Tower assembly activities occurred in Segment 3 (April 23, 2019)



Photo 8. Grading activities at wet crossing on access road to Construction Area 4X04, Segment 4 (October 12, 2020)





Photo 9. Wire wreck-out activities at Construction Area 5X29, Segment 5 (March 11, 2020)



Photo 10. Site restoration activities at Construction Area 6531A, Segment 6 (December 21, 2020)

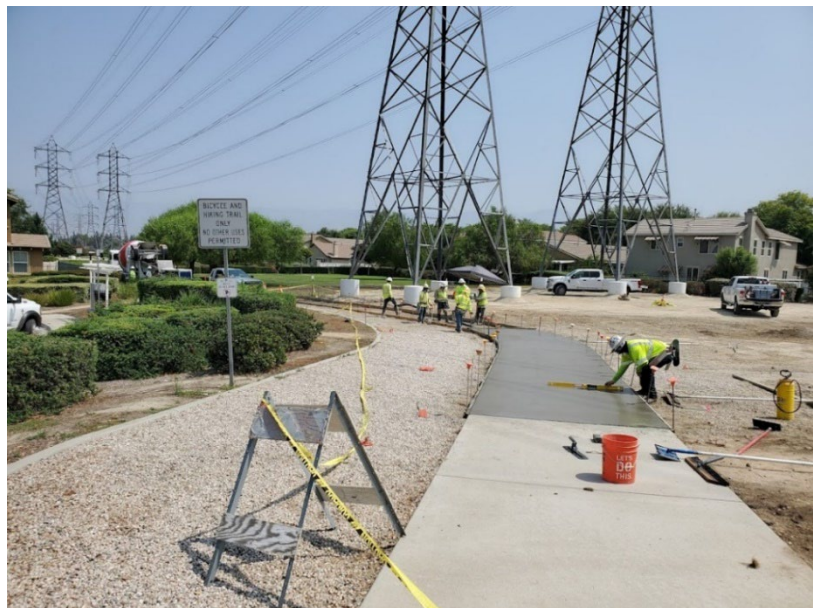


Photo 11. Concrete replacement activities at Construction Area 1X12, Segment 1 (August 17, 2021)



Photo 12. Natina application to soldier pile wall at Construction Area 2N11, Segment 2 (June 21, 2021)



Photo 13. Fire damage caused by dropped wire striking a distribution line between Construction Areas 6N27 and 6N28, Segment 6 (May 1, 2020)