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PROJECT MEMORANDUM
SCE WEST OF DEVERS (WOD) UPGRADE PROJECT

To: Billie Blanchard, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Date: August 21, 2018
Subject: Monitoring Report #28: August 6 to 19, 2018

Introduction

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

CPUC Environmental Monitor (EM): CPUC EM Jamie Miner, was onsite August 6, 7, 8, 10, 13, 14, 15, and 17. CPUC Lead EM Jenny Slaughter was onsite August 14-17.

CPUC Notices to Proceed (NTPs)

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

Table 1 - NTPs
(Updated 08/21/18)

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

Construction & Compliance

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

Material Yards (NTP #1)

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

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



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

CPUC granted authorization for material storage at the Devers MY in early October 2017. This authorization did not include any activities associated with construction or yard improvements, which are not expected to be required for the project.

After verification that preconstruction measures had been fulfilled, CPUC authorization to begin yard preparation work at the Mountain View #1 and Poultry MYs was provided on February 14, 2018, and authorization for the Beaumont #2 MY was granted on March 2, 2018. The preconstruction compliance package for the Matich MY was received April 16, 2018 and authorization to begin yard preparation work was provided on May 1, 2018. The preconstruction compliance package for the Grand Terrace MY was submitted on June 18, 2018. CPUC granted authorization to proceed on June 21, 2018.

Summary of Construction Activity

1. For the currently approved material yards, Cold Smoke Fence Company is installing chain link fencing. All other activities are being performed by the contractor operating out of each respective yard.
2. The Poultry MY is being utilized by Barnard Construction and Power Grade Incorporated as their primary base of operations and material/equipment storage location. Work associated with the Poultry MY included recontouring and paving access road and parking areas, and connecting trailers to the permanent power source (see Photo 1). Material/equipment deliveries and general yard maintenance also occurred throughout the monitoring period.
3. The Matich MY is being utilized by Barnard Construction primarily for tubular steel pole (TSP) storage. No construction activities occurred at the Matich MY throughout the monitoring period.
4. The Mountain View #1 MY is being utilized by Hot Line Construction as their primary base of operations and materials/equipment storage location. Work associated with the Mountain View #1 MY was limited to material/equipment deliveries and general yard maintenance throughout the monitoring period.
5. The Beaumont #2 MY is being utilized by CJ/Aldridge Drilling as their primary base of operations and material/equipment storage location. Material/equipment deliveries and general yard maintenance occurred at the Beaumont #2 MY throughout the monitoring period.
6. The Grand Terrace MY is being used primarily as a show-up location for project construction crews. Work associated with the Grand Terrace MY during the reporting period included the installation of chain link perimeter fencing and privacy screening.
7. No project-related activities occurred at the Devers MY throughout the monitoring period.

Environmental Compliance

1. All construction activities associated with NTP #1 were in compliance with Project mitigation measures, permit conditions, and plan requirements throughout the monitoring period.

2. There were no SWPPP maintenance items or corrective actions associated with NTP #1 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #1.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #1 identified during the monitoring period.
4. There were no new active nests and no fledged/failed (non-project) nests associated with NTP #1 reported during the monitoring period. To date, there are no active nests located within work areas associated with NTP #1. If required, nest buffers for non-special-status bird species will be implemented by SCE per the requirements of the Project Nesting Bird Management Plan (NBMP). There were no approved buffer reductions for non-special-status species for work areas associated with NTP #1 recorded during the monitoring period. If required, removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. There were no such nests removed from work areas associated with NTP #1 recorded during the monitoring period.
5. Special-status species observed or identified at locations associated with NTP #1 during the monitoring period included Cooper's hawk.

Substations (NTP #2)

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

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

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

Summary of Construction Activity

1. For the currently approved substation components, all work is being conducted by SCE crews.
2. Work associated with the San Bernardino Substation upgrades included installation of control cable and connecting control cable inside the MEER building.
3. Work associated with the El Casco Substation included closing disconnect switches at Position #7.
4. No construction activities associated with the Etiwanda Substation occurred throughout the monitoring period.
5. No construction activities associated with the Vista Substation occurred throughout the monitoring period.
6. No construction activities associated with the Devers Substation occurred throughout the monitoring period.

Environmental Compliance

1. All construction activities associated with NTP #2 were in compliance with Project mitigation measures, permit conditions, and plan requirements throughout the monitoring period.

2. There were no SWPPP maintenance items or corrective actions associated with NTP #2 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #2.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #2 identified during the monitoring period.
4. There were no new active nests and two fledged/failed (non-project) nests associated with NTP #2 reported during the monitoring period. To date, there are no active nests located within work areas associated with NTP #2. If required, nest buffers for non-special-status bird species will be implemented by SCE per the requirements of the NBMP. There were no approved buffer reductions for non-special-status species for work areas associated with NTP #2 recorded during the reporting period. If required, removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. There were no such nest removed from work areas associated with NTP #2 recorded during the monitoring period.
5. No special-status species were observed or identified at locations associated with NTP #2 during the monitoring period.

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

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

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

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

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

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

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

SCE submitted the preconstruction compliance package associated with work along Smith Creek for the Banning Connection on July 23, 2018. CPUC authorization is was granted on July 26, 2018.

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

Summary of Construction Activity

1. For the currently approved subtransmission and distribution components, major construction activities are being performed primarily by Hot Line Construction with support from CJ Drilling, Barnard Construction, SCE crews, and Mowbray Tree Service. Work associated with underground telecom components are being conducted by W.A. Rasic Construction.
2. Distribution work associated with the Dental and Intern Circuits included trenching for underground alignment, installation of underground vaults and conduit, repaving along Mission Road in the City of Loma Linda.
3. Work associated with the Timoteo Relocation subtransmission improvements included potholing for existing utilities, tree trimming, trenching for underground alignment, installation of underground conduit and conductor wire, erection of lightweight tubular steel poles (LWTSPs) and tubular steel poles (TSPs), installation of overhead conductor wire, repaving roads, repairing curbs and gutters, replacing a cinder block wall, and general clean-up (see Photo 2).
4. Work associated with the Tennessee Relocation subtransmission improvements included potholing for existing utilities, tree trimming, installation of underground conductor wire, erection of LWTSPs and TSPs, installation of overhead conductor wire, and general clean-up.
5. Work associated with the Banning Connection included excavation of boring pits and completion of horizontal directional drilling (HDD) along Smith Creek (see Photo 3).
6. No construction activities associated with the Juanita Reconductor occurred throughout the monitoring period.
7. No construction activities associated with the Timoteo-Tennessee Removal occurred throughout the monitoring period.
8. No construction activities associated with the San Bernardino Connection occurred throughout the monitoring period.
9. No construction activities associated with the Timoteo-Redlands Connection occurred throughout the monitoring period.
10. No construction activities associated with the El Casco Connection occurred throughout the monitoring period.
11. Work associated with the Maraschino Connection telecommunications improvements has been completed.
12. Work associated with the El Casco–Banning Connection telecommunications improvements has been completed.

Environmental Compliance

1. Four Level 1 Incidents were reported by the CPUC EMs for work associated with the HDD work at Smith Creek during the subject period as described below. A summary of the CPUC Incidents, PMs, and NCRs issued to date is presented in Table 3.
 - On August 14, the CPUC EM observed crews associated with the Smith Creek Telecom HDD operations use an unapproved access road west of the Smith Creek work area (see Photo 4). The SCE Biological Monitor had previously notified the crews that the road was not approved for Project use; however, the crews continued to utilize the road as access from the east was limited due to poor road conditions. Subsequently, SCE postponed further construction activities in the area and

notified the CPUC that a Minor Project Refinement (MPR) is being prepared to request use of the road west of the Smith Creek work area.

- On August 14, the CPUC EM observed excessive fugitive dust generated by crews associated with the Smith Creek Telecom operations during construction activities. Although a water truck was onsite, it was not observed being used to control the fugitive dust emissions caused by construction activities.
 - On August 15, the CPUC EM observed crews associated with the Smith Creek Telecom operations unloading materials in an unapproved work area (see Photo 5). The incident occurred along the side of the road at the intersection of South San Geronio Avenue and Wesley Street. According to the SCE, no impacts to sensitive resources were identified.
 - CPUC MPR #16 was approved in June for the shift of horizontal directional drilling (HDD) alignment through Smith Creek. The 401 Certification includes a condition that an HDD Plan be subject to review and approval by State Water Board staff prior to HDD operations under waters of the State. As conditioned in the MPR #16 approval, "SCE shall provide the SWQCB approved HDD Plan to the CPUC prior to the start of drilling activities". Additionally, on August 16, the CPUC requested documentation of the HDD Plan approval by State Water Board staff. To date, SCE has not provided the CPUC with documentation of the approval by the California State Water Resources Control Board for their proposed HDD Plan.
2. During HDD operations at the Smith Creek location, four frac-outs occurred within the jurisdictional drainage (ID #4099 Smith Creek) during conduit pullback. No flowing water was present at the time. The first frac-out was observed by the CPUC EM along the access road just before 2:00 pm and was immediately reported to the HDD crew. HDD activities continued for approximately 30 minutes and three other frac-outs occurred during that time. The total volume of drilling mud that surfaced for all four frac-outs combined was estimated to be approximately 20 gallons. The construction crew used a vacuum truck to remove the drilling mud that surfaced. The CPUC has requested documentation that resource agencies were notified of the frac-outs. To date, this has not been provided. According to SCE's HDD Frac-out Prevention Response Plan, "If there is a frac-out in the water feature, all work must be halted until authorization to proceed under an emergency permit is obtained". As stated above, work continued after the first frac-out was observed. SCE has indicated that the incident is still under investigation and that an environmental stand-down for the contractor is in place.
 3. Due to power loading issues associated with hot weather, line outages in place to perform underground conductor wire installation are being periodically rescheduled to overnight hours. A revised encroachment permit from the City of Redlands, which included approval for overnight work associated with installation of underground cable only, was provided on July 25, 2018.
 4. There were no SWPPP maintenance items or corrective actions associated with NTP #3 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #3.
 5. One spill was reported associated with NTP #3 during the monitoring period. SCE provided a spill report on August 20 for the frac-outs that occurred on August 14. The spill report indicated that resource agencies were notified. The CPUC has requested documentation of these notifications.
 6. There were no new active nests and no fledged/failed nests associated with NTP #3 reported during the monitoring period. To date, there are no active nests located within work areas associated with NTP #3. If required, nest buffers for non-special-status bird species will be implemented by SCE per

the requirements of the Project NBMP. There were no approved buffer reductions recorded for non-special-status species for work areas associated with NTP #3 during the reporting period. If required, removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. There were no such nests removed from work areas associated with NTP #3 recorded during the monitoring period.

7. Special-status species observed or identified at locations associated with NTP #3 during the monitoring period included golden eagle and Los Angeles pocket mouse.

Transmission Work (NTP #4)

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

The preconstruction compliance package for Segment 4 was received May 1, 2018 and authorization was granted on May 4, 2018. The preconstruction package for Segment 3 was received on June 1, 2018. Authorization was granted on June 12, 2018. The preconstruction package for Segment 1 was received on July 6, 2018 and authorization was granted on July 10, 2018. The preconstruction package for Segment 2 was received on July 16, 2018 and approved on July 18, 2018.

Summary of Construction Activity

1. For the currently approved transmission components, Power Grade Incorporated is conducting access road maintenance/stabilization, BMP installation, vegetation removal, and site grading. CJ Drilling is performing foundation drilling and concrete pouring.
2. Work associated with Segment 1 included installation of BMPs at Sites 1X03, 1X04-1X05, 1X06, 1X08, 1X10-1X11, and 1X12-1X13.
3. Work associated with Segment 2 included installation of BMPs at Site 2N32.
4. Work associated with Segment 3 included access road maintenance and installing BMPs at Sites 3N01, 3N02, 3X21, 3X23, 3X50, 3X51, 3X56, 3X57, 3X62, 3X63, 3X64, and 3X65. Vegetation removal occurred at Sites 3N01 and 3N02. Grading activities were conducted at Sites 3X14, 3X15, 3X16, 3X19, and 3X21 (see Photo 8).
5. Work associated with Segment 4 included access road maintenance and installing BMPs at Sites, 4X53, 4S58, 4S59, 4S60, 4N62, 4N63, 4N64, and 4N65. Vegetation removal was performed at Sites 4N63, 4N64, and 4N65. Grading activities were conducted at Sites 4N60, 4S60, 4N63, 4N64, and 4N65. Foundation drilling was conducted at Sites 4X46, 4X53, 4X54, 4X57, and 4N62. Concrete pouring occurred at Sites 4X51, 4X53, 4X54, 4X57, and 4N62 (see Photo 9).

Environmental Compliance

1. All construction activities associated with NTP #4 were in compliance with Project mitigation measures, permit conditions, and plan requirements throughout the monitoring period.
2. A paleontological discovery was made on Segment 3 during grading activities. Further evaluation of the excavated soils was performed and no additional fossils were found. The discovery did not require a delay of the construction operations. The fossil will be cataloged per requirements of the Paleontological Resource Management Plan.
3. There was one SWPPP maintenance item and no corrective action associated with NTP #4 reported by SCE during the monitoring period. On August 17, the Project SWPPP QSP observed excessive sediment collecting along BMPs at Site 4X53 (see Photo 10). Construction crews were notified and the

sediment was removed the same day. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #4.

4. There were no reportable (> 1 gallon) or non-reportable (<1 gallon) spills associated with NTP #4 identified during the monitoring period.
5. There was one new active nest and two fledged/failed nest associated with NTP #4 identified during the monitoring period. To date, there are two active nests (red-tailed hawk, mourning dove) located within work areas associated with NTP #4. If required, nest buffers for non-special-status bird species will be implemented by SCE per the requirements of the Project NBMP. There were no approved buffer reduction for non-special-status species for work areas associated with NTP #4 recorded during the reporting period. If required, removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. There were no such nests removed from work areas associated with NTP #4 recorded during the monitoring period.
6. Special-status species observed or identified at locations associated with NTP #4 during the monitoring period included Cooper's hawk and white-tailed kite.

Transmission Work BLM Lands (NTP #5)

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

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

Table 2 summarizes the TEWS and MPRs for the WOD Upgrade Project to date. MPR #19 was submitted during the subject reporting period.

Table 2 - TEWS & MPRs
(Updated 08/21/18)

TEWS / MPC	Date Requested	Date Issued	Phase	Description
Temporary Extra Workspaces (TEWS)				
TEWS #1	10-12-17	10-19-17	Maraschino Connection	Access to Beaumont Cherry Valley District water hydrant meter located near the intersection of Highland Springs Avenue and Crooked Creek, Beaumont.
TEWS #2	11-13-17	11-21-17	El Casco– Banning Connection	Water source on Oak Valley Boulevard.
TEWS #3	12-15-17	12-15-17	Banning Connection	Access to existing poles off of Lincoln Street.
TEWS #4	12-18-17	12-18-17	Banning Connection	Access to existing poles off of Wesley Street.
TEWS #5	12-20-17	12-21-17	Banning Connection	Access to existing poles at intersection of Wesley Street and Old Idyllwild Road

TEWS / MPC	Date Requested	Date Issued	Phase	Description
TEWS #6	6-13-18	6-13-18	Timoteo Relocation	Extra workspace to facilitate erection of TSP #4696058 at intersection of Redlands Boulevard and Bryn Mawr Street
TEWS #7	7-27-18	7-30-18	Timoteo Relocation	Extra workspace to facilitate wire pulling activities along Research Drive and Almond Avenue
Minor Project Refinements (MPRs)				
MPR #1	11-17-17	11-22-17	Maraschino Connection	Revisions to the amount of new underground telecom construction.
MPR #2	12-13-17	12-15-17	Maraschino Connection	Addition of two vault work areas on Highland Springs Road.
MPR #3	12-21-17	12-28-17	El Casco– Banning Connection	Adjustments to alignment along Oak Valley Parkway
MPR #4	12-27-17	1-3-18	Maraschino/ El Casco– Banning Connections	Continued use of two fire hydrants previously approved as TEWS #1 and TEWS #2
MPR #5	1-16-18	1-22-18	Banning Connection	Continued use of access routes described in TEWS #3, 4, and 5 and temporary access paths through private property along Coyote Trail
MPR #6	2-8-18	2-12-18	Project-wide	Use of 10 water sources to support construction activities
MPR #7	2-23-18	2-28-18	Poultry MY	Temporary water and electrical supply to yard
MPR #8	2-27-18	3-2-18	El Casco Connection/ Segment 1	New telecom splice location and single new steel pole installation
MPR #9	3-26-18	3-27-18	El Casco Connection	Telecom work areas along El Casco Substation access road
MPR #10	4-6-18	4-9-18	Mountain View #1 MY/All subtrans	Additional work spaces at Mountain View #1 MY entry and at subtransmission improvements work areas
MPR #11	5-4-18	5-8-18	Tennessee Relocation	Relocation of 5 subtransmission structures from the east side to the west side of Nevada Street
MPR #12	5-14-18	5-16-18	Timoteo Relocation	Additional work space for TSP erection at Bryn Mawr Avenue and Interstate 10.
MPR #13	5-23-18	5-25-18	Project-wide	Addition of encased fire hose to O’Grady Court water source and use of 17 water sources to support construction activities

TEWS / MPC	Date Requested	Date Issued	Phase	Description
MPR #14	5-24-18	5-31-18	Timoteo/ Tennessee Relocations	Location shift of 3 TSPs and 1 vault location
MPR #15	5-31-18	6-4-18	Poultry MY	Paving of access road and trailer complex area
MPR #16	6-11-18	6-13-18	Banning Connection	Shift of horizontal directional drilling (HDD) alignment through Smith Creek and addition of walking paths along Coyote Trail
MPR #17	6-20-18	6-22-18	Dental Circuit/ Tennessee Relocation	Additional work space along Mission Road, Lugonia Avenue, and Nevada Street
MPR #18	8-3-18	8-7-18	Timoteo Relocation/ Beaumont #2 MY	Expansion of vault installation work area off Mountain View Avenue and new water source near Beaumont #2 MY
MPR #19	8-13-18	8-20-18	Segment 4	Additional work space requests at Sites 4N58, 4N59, and 4N64

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

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

Table 3
CPUC Incidents, Project Memoranda, and Non-Compliance Reports
(Updated 08/21/18)

Incident/ PM/NCR	Regulatory Requirement	Date Issued	Phase	Description
Level 1 Incident	Traffic Control Plan	01-30-18	Banning Connection	Traffic control was set up in such a way that diverted flow into active work area and deviated from approved Traffic Control Plan.
Level 1 Incident	MM WIL-1b	04-19-18	Timoteo/ Tennessee Relocation	A portable water tank was observed uncovered for four consecutive days.
Level 1 Incident	MM VEG-1a	5-24-18	El Casco Substation	Equipment was staged outside of approved disturbance limits for at least 1-2 days.
Level 1 Incident	MM AQ-1a	8-15-18	Telecom	Fugitive dust observed from construction activities.
Level 1 Incident	MM WIL-1b	8-15-18	Telecom	Use of unapproved access road.

Incident/ PM/NCR	Regulatory Requirement	Date Issued	Phase	Description
Level 1 Incident	MM WIL-1b	8-15-18	Telecom	Use of unapproved staging area.
Level 1 Incident	MPR #16	8-15-18	Telecom	SWRCB approved HDD Plan not provided prior to HDD activities.

PROJECT PHOTOGRAPHS



Photo 1 – New pavement being applied at Poultry MY (August 10, 2018).



Photo 2 – Installing overhead conductor wire along Lugonia Avenue for the Timoteo Relocation (August 6, 2018).



Photo 3 – HDD operations occurring along Smith Creek for the Banning Connection (August 14, 2018).



Photo 4 – HDD crew utilizing unapproved access road west of Smith Creek work area (July 14, 2018).



Photo 5 – HDD crew unloading manhole cover in unapproved work area (August 14, 2018).



Photo 6 – Initial frac-out identified by CPUC EMs along Smith Creek during HDD operations (August 14, 2018).



Photo 7 – Three additional frac-outs identified along Smith Creek during HDD operations (August 14, 2018).



Photo 8 – Grading activities occurring at Site 3X19 (August 14, 2018).

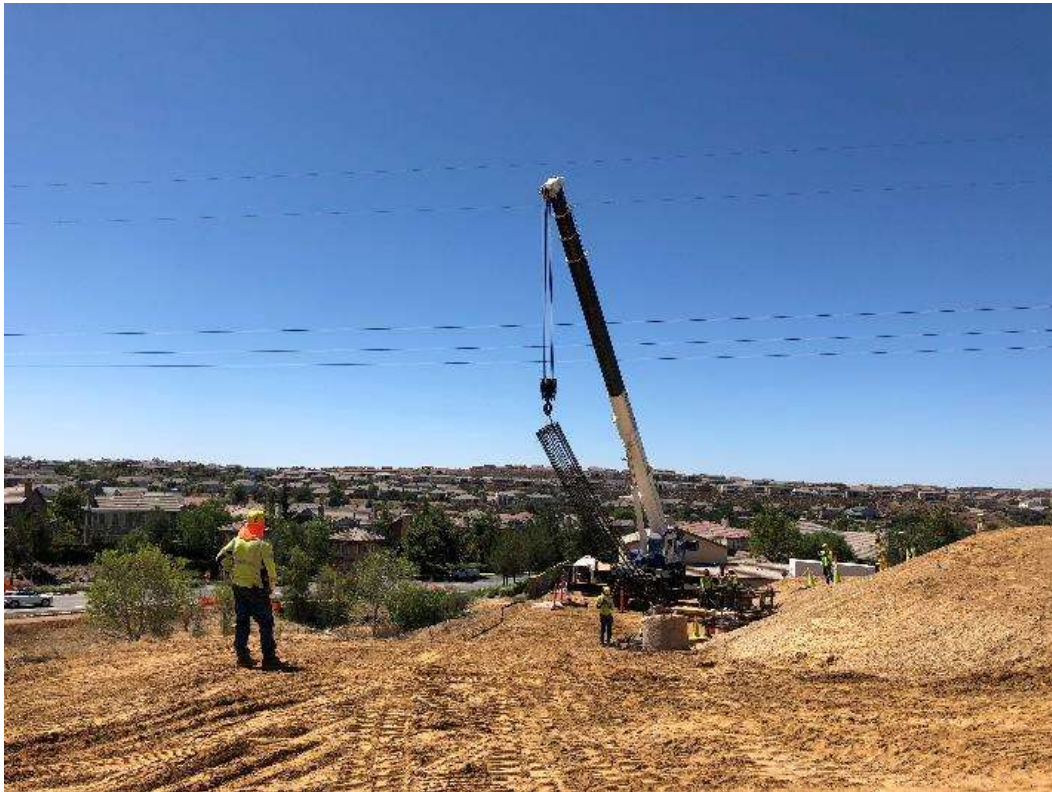


Photo 9 – Setting the cage prior to concrete pour at Site 4X51 (August 6, 2018).

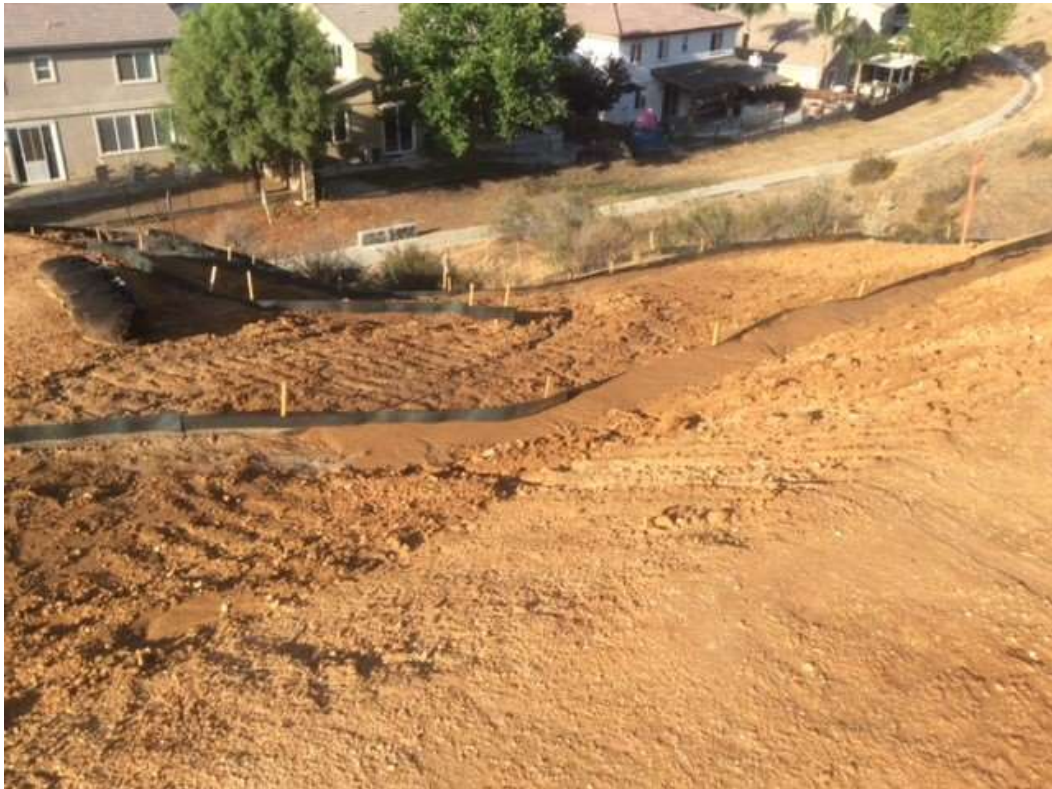


Photo 10 – Sediment built up behind BMPs at Site 4X53. BMPs were maintained the same day (photo courtesy of SCE) (August 17, 2018).