



5020 Chesebro Road, Suite 200, Agoura Hills, CA 91301-2285
Tel. 818-597-3407 • Fax 818-597-8001 • www.aspeneg.com

PROJECT MEMORANDUM
SCE WEST OF DEVERS UPGRADE PROJECT

To: John Forsythe, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Date: November 7, 2019
Subject: Monitoring Report #87: October 28 to November 3, 2019

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. SCE self-performed work (NTPs #2 and #3) is essentially complete with the exception of substation equipment upgrades and minor tie-ins. 220 kV work (NTPs #4 and #5) is approximately 44% complete.

CPUC Environmental Monitor (EM): CPUC EM, Rosina Goodman, was onsite October 28 through 30 and November 1.

CPUC Notices to Proceed (NTPs)

Table 1 summarizes the NTPs with construction for the WOD Upgrade Project. No additional NTPs are required.

Table 1 - 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

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 (not being used)
- Grand Terrace MY
- Poultry MY

- San Timoteo MY (not being used)
- Beaumont #1 MY (not being used)
- Beaumont #2 MY
- Matich MY
- Hathaway #2 MY (not being used)
- Devers MY

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

Summary of Construction Activity

1. For the currently approved MYs, all activities are being performed by the contractor operating out of each respective yard.
2. The Poultry MY is being utilized by Barnard Construction and Power Grade Incorporated as their primary base of operations and material/equipment storage location. Work associated with the Poultry MY included material/equipment deliveries and general yard maintenance throughout the monitoring period including clearing weeds along the yard driveway entrance. No helicopter operations out of Poultry MY occurred during the monitoring period.
3. The Matich MY is being utilized by Barnard Construction primarily for tubular steel pole (TSP) storage. Work associated with the Matich MY included material/equipment deliveries throughout the monitoring period.
4. The Mountain View #1 MY is being utilized by Abercrombie Services as their primary base of operations and materials/equipment storage location.
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 will be used primarily as a show-up location for project construction crews.
7. The Devers MY is being utilized by CJ/Aldridge, Abercrombie Services, and Power Grade for construction activities on Segment 6. Material/equipment deliveries, and general yard maintenance. Helicopter operations occurred out of the Devers Yard throughout the monitoring period.

Environmental Compliance

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #1 throughout the monitoring period.
2. There were two SWPPP maintenance item or corrective action associated with NTP #1 recorded during the monitoring period for the Poultry MY and the Matich MY for perimeter controls around treated wood poles; cribbing underneath had been previously added. During the Bi-weekly Agency Project Meeting with SCE on November 5, Barnard stated that rock berms are being installed and should be in place by the end of the week.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #1 identified during the monitoring period.
4. As of the end of the monitoring period, there are no active nests at locations associated with NTP #1 during the monitoring period. If required, nest management, including establishment of buffers and

the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the Project Nesting Bird Management Plan (NBMP). No nests were removed during the subject reporting period.

5. No special-status species were observed or identified at locations associated with NTP #1 during the monitoring period.

Substations (NTP #2)

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

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

To date, all pre-compliance materials associated with NTP #2 that have been submitted have been approved.

Summary of Construction Activity

1. For the currently approved substation components, all work is being managed by Circle Wood Services with construction support from TTR Substations, Cunningham-Davis, and SCE crews. Wire stringing connections and wreck-out activities between the project alignment and locations within the substations are being performed by Abercrombie Services.
2. No construction activities associated with NTP #2 occurred during the monitoring period.

Environmental Compliance

1. There was no SCE self-reported and no CPUC incidents documented for construction activities associated with NTP #2 throughout the monitoring period.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #1 recorded during the monitoring period. To date, there are no open SWPPP maintenance 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. As of the end of the monitoring period, there are no active nests located within work areas associated with NTP #2. If required, nest management, including establishment of buffers and the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the Project NBMP. No nests were removed during the subject reporting period.
5. No new special status species were observed or identified at locations associated with NTP #2 during the monitoring period.

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

NTP #3 included distribution, subtransmission, and telecommunication improvements as presented below. These construction activities have been essentially completed, with minor follow up required in response to Project activities.

Distribution improvements included the following:

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

Subtransmission improvements included the following:

- 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)

Telecommunication improvements included the following:

- 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), Segment 3
- Maraschino Substation Connection to Devers-Valley OPGW (Maraschino Connection)
- El Casco–Banning Connection to Devers-Vista Skywrap (El Casco–Banning Connection), Segment 4
- Banning Substation Connection to Devers-Valley OPGW (Banning Connection), Segment 6

Summary of Construction Activity

1. For the currently approved subtransmission and distribution components, construction activities are being performed by Abercrombie Services and SCE crews. No construction activities associated with NTP #3 occurred during the monitoring period.
2. As summarized below, construction of the NTP #3 primary components is essentially complete with the exception of minor tie-ins.
 - For distribution components, all 19 12-kV poles have been framed, all 12 12-kV underground vaults have been installed, and 7,430 feet of 12-kV duct bank (conduit) and 10,760 feet of 12-kV conductor wire has been installed.
 - For subtransmission components, 119 of 119 66-kV light weight TSPs have been erected, 19 of 19 TSPs have been erected, and 25,610 feet of 66-kV wire has been installed. Both the Timoteo and Tennessee circuits have been energized. Wreck-out of the existing subtransmission infrastructure has been completed.

Environmental Compliance

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #3 throughout the monitoring period.
2. 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.
3. There were no reportable (>1 gallon) or non-reportable (<1 gallon) spills associated with NTP #3 identified during the monitoring period.

4. As of the end of the monitoring period, there are no active nests located within work areas associated with NTP #3. If required, nest management, including establishment of buffers and the removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. No nests were removed during the subject reporting period.
5. No special-status species were observed or identified at locations associated with NTP #3 during the monitoring period.

Transmission Work (NTP #4)

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

To date, pre-compliance materials associated with NTP #4, Segments 1 through 6, have been submitted and approved.

Summary of Construction Activity

1. For the currently approved transmission components, Power Grade Incorporated is conducting access road maintenance/stabilization, BMP installation, vegetation removal, and site grading. CJ/Aldridge Drilling is performing foundation work. Abercrombie Services is assembling and erecting new towers, and conducting wire operations with support from Summit Helicopters. Cunningham Davis Corporation is removing existing towers and foundations. Ancillary telecommunication work approved in NTP #4 is being performed by SCE crews.
2. There were no work activities associated with Segment 1 during the monitoring period.
3. Work associated with Segment 2 included: Tower assembly at Construction Area 2N12; vegetation clearing and grading at Construction Areas 2N01-WSS, 2N01, 2N12, WSS-2N12-MPR-31, WSS-2-2N26-2-MPR-28, 2X18, and 2X33-34; grading, roadway maintenance, and k-rail installation at Construction Area 2N32; and guard pole drilling and installation at GS-2-W-2N32 and GS-2-E-2N32 (see Photo 1).
4. Work associated with Segment 3 included BMP maintenance at Construction Area 3X46.
5. Work associated with Segment 4 included: Grading at Construction Area 4X06; roadway maintenance from Construction Area 4X02 through 4X13; Hilfiker wall construction at Construction Area 4X13 (Morongo lands); and foundation activities at Construction Areas 4X14 through 4X24.
6. Work associated with Segment 5 (which includes sites within Morongo lands along Segment 5 as reported by SCE) included foundation activities at Construction Areas 5X03, 5X04, 5X09, and 5X10 (see Photo 2).
7. Work associated with Segment 6 (non-BLM lands) included: Foundation activities at Construction Areas 6X09, 6X10, 6N27, 6S31, and 6X48; tower assembly at Construction Areas 6X10, 6N26, and 6S38 through 6S41; BMP maintenance at Construction Areas 6N27 and 6S36; wire stringing punchlist items at Construction Areas 6S14 through 6S22; and wire stringing activities from Construction Area 6S26 through 6S34 (see Photo 3).
8. 220 kV construction updates from SCE are being provided on a bi-weekly basis. The next update will be provided on November 19. As of November 5, construction progress associated with NTP #4 is as follows:
 - Grading for foundation installation has been completed at 442 of 469 sites.
 - Foundations are completed for 249 of 386 lattice towers and 67 of 83 TSPs.
 - Erection of 141 of 386 lattice towers and 48 of 83 TSPs have been completed.

- Erection of 55 of 109 temporary shoofly locations has been completed.
 - Stringing of approximately 3.7 of 8.0 circuit miles of shoofly conductor, 46.2 of 184.0 circuit miles of mainline conductor, and 23.03 of 99.0 circuit miles of OPGW fiber has been completed.
 - Demolition of 129 of 602 existing structures and 86 of 415 existing foundations has been completed.
 - Wire wreck-out has been completed along 24.3 circuit miles.
9. The first required outages (Project Move 1 and Project Move 2) were completed in 2018. Project Move 3 in Segment 3 was completed May 10, 2019. Move 4 in Segment 1 was completed August 3. Move 5 in Segments 1, 2, 5, and 6 began on August 5 and is expected to be completed by February 14, 2020. Move 6 in Segment 2 began on October 14 and is expected to be completed by February 14, 2020.

Environmental Compliance

1. There were two SCE self-reported incidents and four non-project related observations during the monitoring period. On October 30, the onsite biologist observed one drill hole fully uncovered and other drill holes with large rips in the plastic covering at Construction Area 4X13 on Segment 4, resulting in SCE issuing a Level 1 Incident (see Photo 4). Plastic was present over the holes and secured around the edges; however, due to high winds overnight, the plastic was ripped open. On November 3, a rigging failure during wire stringing operations on Segment 6 occurred resulting in the conductor and a traveler touching the ground outside of the approved work area north of Construction Area 6S30. The onsite biological monitor assessed the area after the conductor was secure, the remaining sagging activities of the day were completed, and a Level 1 Incident was issued. The non-project related observations were for trash dumped along the right-of-way and non-project related construction activities in Segments 1 and 6.
2. There were four SWPPP maintenance items associated with NTP #4 recorded during the monitoring period for Construction Areas in Segment 6. All items were damaged prowattles and sediment buildup. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #4.
3. There were no reportable (>1 gallon) or non-reportable (<1 gallon) spills associated with NTP #4 identified during the monitoring period.
4. Meetings to review helicopter flight tracks with SCE are occurring every two weeks. Flight tracks are reviewed to monitor compliance with local jurisdiction construction work hours and sensitive receptor avoidance, including residences, schools, and nesting bird avoidance areas. The track review occurred on October 31 for October 15 through October 29. There were 26 flights over 10 days during the review period and no incursions were identified. The next flight track review will be on November 14.
5. As of the end of the monitoring period, there are seven active nests at locations associated with NTP #4 during the monitoring period. Nests include: six burrowing owls with one owl utilizing two burrows. Buffers have been established per the Project NBMP. If required, nest management, including establishment of buffers and the removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. No nests were removed during the subject reporting period.
6. There were three special-status species observed near Segments 4, 5, and 6 during the monitoring period. These included: northern harrier, burrowing owl, and sharp-shinned hawk.
7. There were four new active woodrat middens identified on Segments 5 and 6 during the monitoring period. 10-foot ESA avoidance buffers were staked per the Special-status Small Mammals Avoidance and Minimization Plan. There were no woodrat midden relocations documented during the monitoring period.

- SCE provided documentation of FAA filings for the Project on September 17 and September 26; FAA concurrence will be required prior to tower installation where applicable. Additional information was provided February 11, 2019. FAA recommended marker balls have been installed on the shoofly spans near El Casco Substation.

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. The preconstruction compliance package for BLM lands was deemed acceptable by BLM on February 5, 2019.

Summary of Construction Activity

- For the currently approved transmission components, Power Grade Incorporated is conducting access road maintenance/stabilization, BMP installation, vegetation removal, and site grading. CJ/Aldridge Drilling is performing foundation work. Abercrombie Services is assembling and erecting new towers, and conducting wire operations with support from Summit Helicopters. Cunningham Davis Corporation is removing existing towers and foundations.
- Work activities associated with Segment 6 (BLM lands) during the monitoring period included wire stringing activities from Construction Area 6S26 through 6S34 and tower assembly at Construction Area 6N26.

Environmental Compliance

See NTP #4 discussion above for environmental compliance activities.

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

No TEWS or MPRs were approved during the subject monitoring period. Table 2 summarizes the TEWS and MPRs for the WOD Upgrade Project to date.

Table 2 – TEWS & MPRs
(Updated 11/7/19)

TEWS / MPR	Date Requested	Date Issued	Phase	Description
Temporary Extra Workspaces (TEWS)				
TEWS #1	10-12-17	10-19-17	Maraschino Connection	Access to Beaumont Cherry Valley District water hydrant meter located near the intersection of Highland Springs Avenue and Crooked Creek, Beaumont.
TEWS #2	11-13-17	11-21-17	El Casco–Banning Connection	Water source on Oak Valley Boulevard.
TEWS #3	12-15-17	12-15-17	Banning Connection	Access to existing poles off of Lincoln Street.
TEWS #4	12-18-17	12-18-17	Banning Connection	Access to existing poles off of Wesley Street.
TEWS #5	12-20-17	12-21-17	Banning Connection	Access to existing poles at intersection of Wesley Street and Old Idyllwild Road.
TEWS #6	6-13-18	6-13-18	Timoteo Relocation	Extra workspace to facilitate erection of TSP #4696058 at intersection of Redlands Boulevard and Bryn Mawr Street.
TEWS #7	7-27-18	7-30-18	Timoteo Relocation	Extra workspace to facilitate wire pulling activities along Research Drive and Almond Avenue.

TEWS / MPR	Date Requested	Date Issued	Phase	Description
TEWS #8	8-27-18	8-28-18	Dental/Intern Circuits	DENIED AND RESCINDED – Extra workspace to facilitate construction along Mission Road.
TEWS #9	10-18-18	10-19-18	Timoteo Relocation	Extra workspace for walking path at Bryn Mawr and I-10.
TEWS #10	11-05-18	11-05-18	Timoteo Relocation	Extra workspace along Barton and Mountain View Roads for cutover operations.
TEWS #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.
TEWS #12	02-06-19	02-07-19	Timoteo Relocation	Extra workspace along Mountain View Avenue for subtransmission pole removal.
TEWS #13	02-26-19	02-26-19	Segment 3	Temporary access road detour for vehicle and equipment travel to/from San Timoteo Canyon Road and Tower Site 3X41.
TEWS #14	05-13-19	05-14-19	Banning Connection	Extra workspace along the east side of south Alola Street, City of Banning.
TEWS #15	05-16-19	05-17-19	Segment 1	HLZ and temporary staging area for construction vehicles, materials, and equipment.
TEWS #16	07-24-19	07-24-19	Segment 2	Concrete V-ditch south of 3012 Prado Lane, accessible from approved access roads to Construction Area 2X18.
TEWS #17	08-07-19	08-07-19	Segment 6	Access road for guard pole installation near Construction Area 6S15.
TEWS #18	08-16-19	08-16-19	Segment 6	Helicopter landing zone and temporary staging area for construction vehicles, materials, and equipment.
TEWS #19	09-05-19	09-05-19	Segment 5	Mobile guard structure on an existing road to Construction Area SF501 for wire stringing activities.
TEWS #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.
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.

TEWS / MPR	Date Requested	Date Issued	Phase	Description
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 workspaces 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 workspace for TSP erection at Bryn Mawr Avenue and Interstate 10.
MPR #13	5-23-18	5-25-18	Project-wide	Addition of encased fire hose to O'Grady Court water source and use of 17 water sources to support construction activities.
MPR #14	5-24-18	5-31-18	Timoteo/ Tennessee Relocations	Location shift of 3 TSPs and 1 vault location.
MPR #15	5-31-18	6-4-18	Poultry MY	Paving of access road and trailer complex area.
MPR #16	6-11-18	6-13-18	Banning Connection	Shift of horizontal directional drilling (HDD) alignment through Smith Creek and addition of walking paths along Coyote Trail.
MPR #17	6-20-18	6-22-18	Dental Circuit/ Tennessee Relocation	Additional workspace 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 workspace requests at Sites 4N58, 4N59, and 4N64.
MPR #20	8-21-18	8-27-18	Banning Connection	Use of unpaved access road west of Smith Creek.
MPR #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.
MPR #22	11-19-18	11-20-18	Subtrans and Telecom	Pole replacement, switch replacement, and shift in underground telecom route.
MPR #23	12-11-18	12-21-18	Transmission	Site 3N32 and Move 3 work areas.
MPR #24	01-15-19	01-28-19	Transmission	Additional Wire Stringing Site in Segment 1.
MPR #25	03-11-19	03-14-10	Transmission	Additional work area west of Supersite 3X55, Segment 3.
MPR #26	04-02-19	04-04-19	Transmission	Use of Prado Lane access road (Segment 2) and two existing hydrants (Segment 6).
MPR #27	04-30-10	05-01-19	Transmission	Use of two existing hydrants (Segment 1), water tank (Segment 2), and helicopter work area (Segment 3).
MPR #28	05-31-19	06-06-19	Transmission	Extra workspace areas, including helicopter landing zones and access roads, on Segments 1, 2, and 6.
MPR #29	06-27-19	07-03-19	Transmission	Extra workspace areas for equipment/material staging, wire stringing, and telecom work, on Segments 3, 4, and 6.
MPR #30	08-01-19	08-06-19	Subtrans and Telecom	Additional workspaces for Maraschino and Devers Telecom Cable Removals, Segments 4 and 6.
MPR #31	10-2-19	10-08-19	Transmission	Extra temporary work areas for wire stringing on Segment 2 and use of an existing access road on Segment 4.

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 11/07/19)

Incident/PM/NCR	Regulatory Requirement	Date Issued	Phase	Description
Level 1 Incident	Traffic Control Plan	01-30-18	Banning Connection	Traffic control was set up in such a way that diverted flow into active work area and deviated from approved Traffic Control Plan.
Level 1 Incident	MM WIL-1b	04-19-18	Timoteo/Tennessee Relocation	A portable water tank was observed uncovered for four consecutive days.
Level 1 Incident	MM VEG-1a	5-24-18	El Casco Substation	Equipment was staged outside of approved disturbance limits for at least 1-2 days.
Level 1 Incident	MM AQ-1a	8-15-18	Banning Connection	Fugitive dust observed from construction activities.
Level 1 Incident	MM WIL-1b	8-15-18	Banning Connection	Use of unapproved access road.
Level 1 Incident	MM WIL-1b	8-15-18	Banning Connection	Use of unapproved staging area.
Level 1 Incident	Fire Management Plan	9-18-18	Segment 4	Lack of adequate fire abatement equipment at 3 locations.
Level 1 Incident	Fire Management Plan	9-20-18	Segment 4	Lack of adequate fire abatement equipment
Level 1 Incident	HH-1a	10-17-18	Segment 4	Lack of proper secondary containment for 4 pieces of equipment.
Level 1 Incident	N-1a	10-17-18	Segment 4	Work outside of approved hours
Level 1 Incident	WIL-1b	10-18-18	Grand Terrace MY	Lack of proper covering for pipes between 1.5" to 4"
Level 1 Incident	N-1a	10-18-18	Segment 4	Work outside of approved hours
Level 1 Incident	AQ-1a	10-30-18	Grand Terrace MY	Fugitive Dust Emissions Outside of Property Boundaries at the Grand Terrace Yard.
Level 1 Incident	WIL-1b	01-24-19	Segment 3	Pipes/tubing left open at Sites 3X08 and 3X10.
Level 1 Incident	AQ-1a	02-13-19	Segment 3	Fugitive dust along Segment 3 access road to 3X06.
Level 2 Incident	VEG-3a	02-13-19	Segment 3	Offsite sediment discharge from access road into JD ID 3054.
Level 1 Incident	SWPPP	09-25-19	Segment 6	The disposal of slurry at tower sites in Segment 6.
Level 1 Incident	SWPPP	10-22-19	Devers, Match, and Poultry MY	Improper storage of treated wood poles.

PROJECT PHOTOGRAPHS



Photo 1 – Guard pole drilling at GS-2-W-2N32, Segment 2 (October 29, 2019).



Photo 2 – Foundation activities at Construction Area 5X04, Segment 5 (October 28, 2019).



Photo 3 – Wire stringing activities at Construction Area 6S26, Segment 6 (October 28, 2019).



Photo 4 – Uncovered drill hole at Construction Area 4X13, Segment 4 (October 30, 2019).