

SOUTHERN CALIFORNIA EDISON'S
VALLEY-IVYGLEN 115-KV
SUBTRANSMISSION LINE PROJECT
**FINAL CONSTRUCTION COMPLETION
REPORT**





SOUTHERN CALIFORNIA EDISON'S VALLEY-IVYGLEN 115-KV SUBTRANSMISSION LINE PROJECT

FINAL CONSTRUCTION COMPLETION REPORT

DATE: DECEMBER 2022

WSP USA INC.
425 MARKET STREET
SAN FRANCISCO, CA 94105

WSP.COM

Contents

1	INTRODUCTION AND PROJECT OVERVIEW	1
1.1	Overview of the VIG Project	1
1.1.1	Schedule	2
1.1.2	Major Project Components	2
1.1.3	Major Project Phases	2
1.2	Roles and Responsibilities of SCE, CPUC, and the WSP Monitoring Team	5
1.2.1	SCE	5
1.2.2	CPUC	5
1.2.3	WSP Monitoring team	5
1.3	Coordination and Communications	6
2	CEQA COMPLIANCE	6
2.1	Potential Significant Impacts	6
2.2	Permits	10
3	CONSTRUCTION AND COMPLIANCE	13
3.1	Preconstruction Compliance	13
3.1.1	Compliance Plans	13
3.1.2	Field Efforts.....	15
3.2	Construction.....	16
3.2.1	Notice to Proceed Request.....	19
3.2.2	Minor Project Refinement Request.....	21
3.3	Compliance During Construction	25
3.3.1	Compliance Requirements During Construction.....	25
3.3.2	Non-compliance Reports	33
3.3.3	Safety Incidents	36
3.3.4	Public/Stakeholder Complaints.....	36
3.3.5	Final Inspection	37
3.4	Post-Construction Compliance	37

Tables

Table 1.	VIG Summary of Permit Requirements	10
Table 2.	VIG: Plans and Other Documentation Required for Compliance Verification	14
Table 3.	Notices to Proceed.....	20
Table 4.	Minor Project Refinements	21
Table 5.	VIG: Summary of Incidents	34
Table 6.	CPUC Compliance Monitor Non-Compliance Reporting.....	34
Table 7.	Public/Stakeholder Complaints	37

Figures

Figure 1.	Subtransmission Line Route.....	4
Figure 2.	Perimeter fencing established at the 74 Central Yard, July 21, 2020.....	16
Figure 3.	Conduit installation along State Route (SR) 74, August 23, 2020	16
Figure 4.	Paving along SR 74, September 17, 2020	16
Figure 5.	Concrete pour of TSP 449, December 16, 2020.....	17
Figure 6.	Newly installed TSP 45 with BMPs, January 20, 2021.....	17
Figure 7.	Undergrounding activities at the intersection of Indian Truck Trail and Temescal Canyon Road, March 17, 2021.....	17
Figure 8.	TSP 2161 work area with orange markers delineating a nesting bird buffer, June 9, 2021	18
Figure 9.	Foundation installation for TSP 370, August 12, 2021	18
Figure 10.	Drilling at Pasadena St. prior to vault installation, September 16, 2021	18
Figure 11.	Discharge area for the dewatering operation in Segment VIG4, October 6, 2021	19
Figure 12.	Bore activities near the Ivyglen Substation, October 6, 2021	19
Figure 13.	Dust suppression performed on access roads near Horsethief Canyon, November 18, 2021	19

Appendices

A Post-Construction Restoration

Abbreviations and Acronyms

Caltrans	California Department of Transportation
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulation
CPCN	Certificate of Public Convenience and Necessity
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CRMTP	Cultural Resources Monitoring and Treatment Plan
CWA	Clean Water Act
ENA	Electrical Needs Area
ESA	Environmentally Sensitive Area
EVMWD	Elsinore Valley Municipal Water District
FAA	Federal Aviation Administration
Final EIR	Final Environmental Impact Report
FCERP	Fire Control and Emergency Response Plan
FRED	Field Reporting Environmental Database
HRRP	Habitat Restoration and Revegetation Plan
IPMP	Invasive Plant management Plan
kV	kilovolt
LWS	lightweight steel
MM	mitigation measure
MMCRP	Mitigation Monitoring, Compliance, and Reporting Program
MPD	Master Plan Development
MPR	Minor Project Refinement
MSERCs	Mobile Source Emission Reduction Credits
MSHCP	multiple species habitat conservation plan
N/A	Not applicable
NCCP	Natural Community Conservation Plan
NCR	Non-compliance Report
NOX	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NTP	Notice to Proceed

OB	Observation
Project	Valley-Ivyglen 115-kV Subtransmission Line Project
PCs	project commitments
PFM	Petition for Modification
PRC	Public Resources Code
PRMP	Paleontological Resource Monitoring Plan
QSD	Qualified SWPPP Developer
QSP	Qualified SWPP Practitioner
RCA	Western Riverside County Regional Conservation Authority
RCHCA	Riverside County Habitat Conservation Agency
ROG	reactive organic gas
ROW	right-of-way
RTCs	Regional Clean Air Incentive Market Trading Credits
RWQCB	Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SAWPA	Santa Ana Watershed Project Authority
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TSP	tubular steel pole
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VIG Project	Valley-Ivyglen 115-kV Subtransmission Line Project
WEAP	Worker Environmental Awareness Program

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) Valley-Ivyglen 115-kV Subtransmission Line (VIG) Project (referred to herein as “the project” or “the VIG Project”). The project involved the construction of a new single-circuit 115-kV subtransmission line and fiber optic line spanning approximately 27 miles. As the Lead Agency for the project, the California Public Utilities Commission (CPUC) conducted the environmental review process and granted final approval of the project. The CPUC certified the Final Environmental Impact Report (Final EIR) in April 2017 and Final EIR Errata documents published between February and June 2018. Additionally, the CPUC issued a Permit for Modification (PFM) on August 31, 2018, to realign portions of the subtransmission line route, underground a portion of the line, and modify the construction method and technique. WSP USA (WSP), under contract with the CPUC, prepared the Final EIR in accordance with the California Environmental Quality Act (CEQA) to inform the public and meet the requirements of local, state, and federal agencies in their evaluation of the SCE proposed project.

In May 2020, the CPUC and WSP, in coordination with SCE, developed the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to provide guidance and procedures for environmental monitoring during project construction. WSP implemented the MMCRP to ensure compliance with the project mitigation measures (MMs), applicant project commitments (PCs), compliance plans, and permit conditions during all phases of construction. The implementation of the MMCRP for the VIG Project is summarized in this Final Report and outlined as follows:

Section 1, Introduction and Project Overview

Section 1 provides an overview of the VIG Project and approvals granted by the CPUC as the lead agency and other responsible agencies. Additionally, this section outlines the roles and responsibilities undertaken by SCE, the CPUC, and WSP as the compliance monitoring team, including permit tracking, notices to proceed with preparation, review of minor project refinements, SCE project commitments, and mitigation implementation.

Section 2, CEQA Compliance

Section 2 summarizes the potential significant impacts identified in the Final EIR and the mitigation measures or project commitments implemented to reduce those impacts.

Section 3, Construction and Compliance

Section 3 provides an overview of construction and compliance activities for the VIG Project, including preconstruction and post-construction activities.

1.1 Overview of the VIG Project

The VIG project is located within unincorporated and incorporated areas of western Riverside County, California. The project objectives are to:

- Serve projected electrical demand requirements in the Electrical Needs Area (ENA);
- Increase electrical reliability to the ENA by providing a direct connection between the Applicant’s Valley 500/115-kV Substation and Ivyglen 115/12-kV Substation; and

- Improve operational and maintenance flexibility on subtransmission lines without interruption of service.

1.1.1 Schedule

A summary of construction on the Project is as follows; overall construction began on 07/08/2022, construction within permitted waters areas began on 12/03/2020 and ended on 11/30/2021, overall construction was completed on 07/20/2022 when the new Valley Ivyglen 115 kV circuit was energized by SCE.

1.1.2 Major Project Components

The VIG Project includes the following main components:

- Construction of a new, single-circuit 115-kV subtransmission line and fiber optic line running approximately 27 miles and constructed within 23 miles of new right-of-way (ROW).
- Installation of overhead fiber optic lines on the proposed structures and underground in new and existing conduit.
- Transfer of existing distribution circuits along portions of the proposed subtransmission line to new 115-kV structures or underground positions.
- Installation of new 115-kV switching and protective equipment at the Valley and Ivyglen Substations.

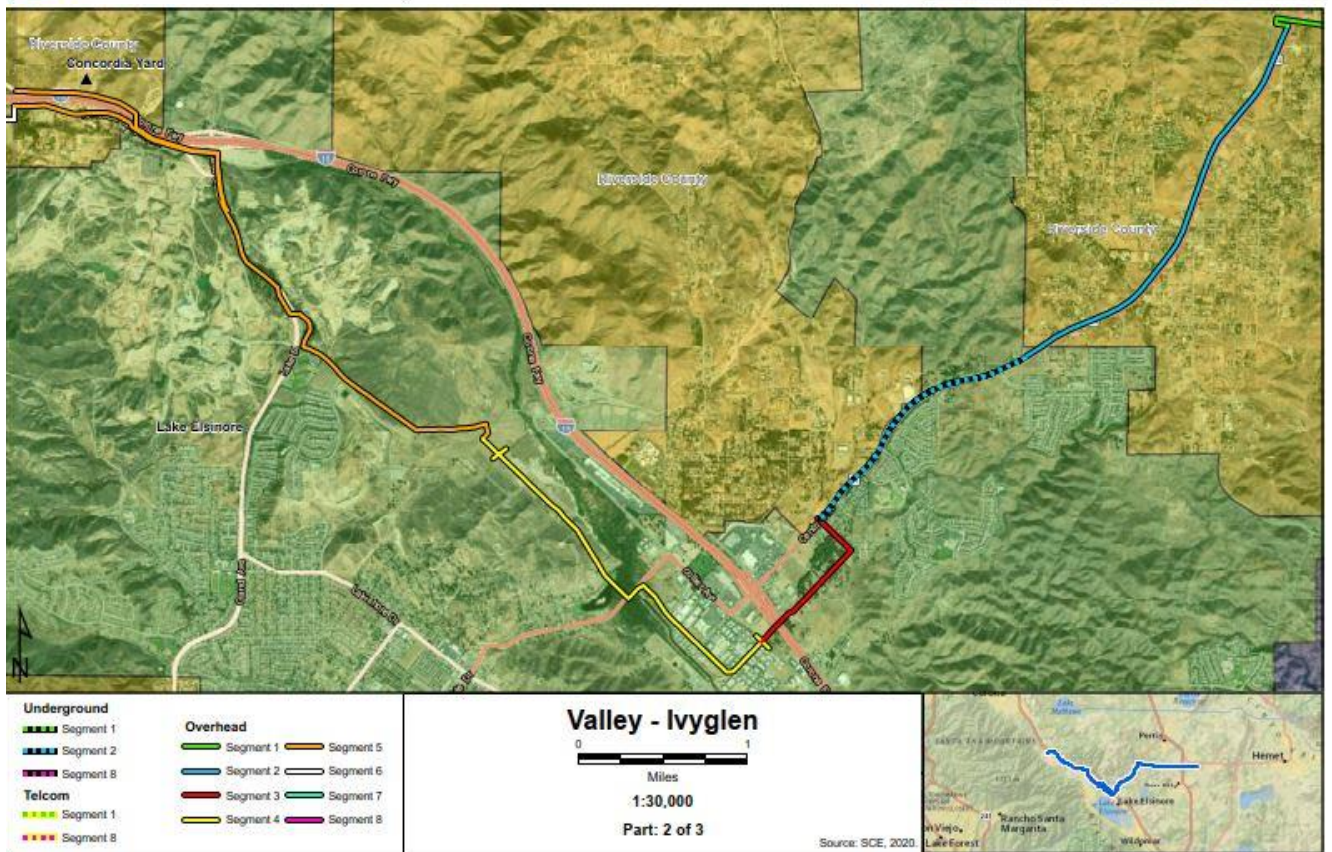
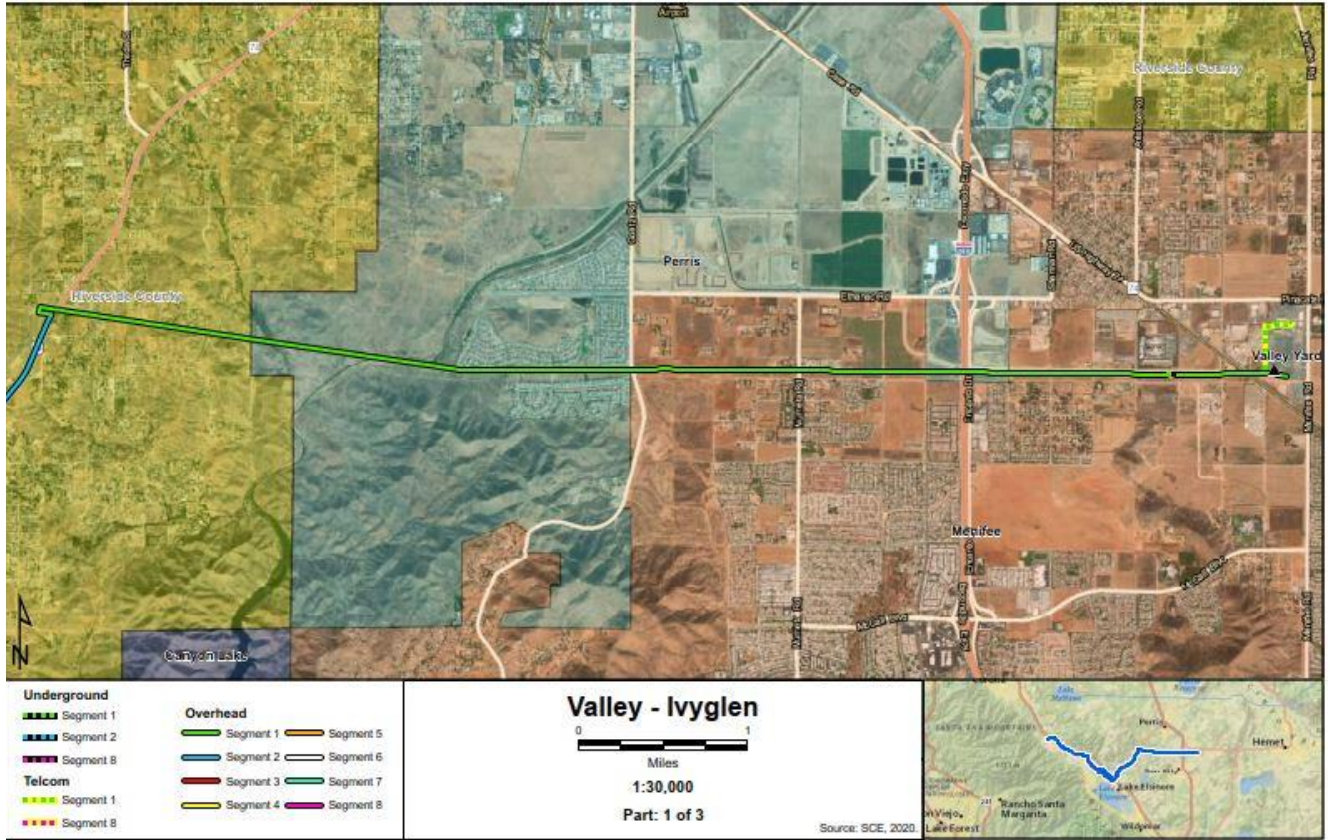
1.1.3 Major Project Phases

Construction was completed in several major phases, as described below.

Phase 1: Installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the transmission line to new 115-kV structures or underground positions, and installations of new 115-kV switching and protective equipment at Valley Substation. Phase 1 construction activities occurred on Segments VIG1, VIG2, VIG3, and excluded work at sites requiring jurisdictional water permits.

Phase 2: Installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the transmission line to new 115-kV structures or underground positions, and installations of new 115-kV switching and protective equipment at Valley Substation. Phase 2 construction activities occurred on Segments VIG4, VIG5, VIG6, VIG7, VIG8, and excluded work at sites requiring jurisdictional water permits.

Phase 3: Installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the transmission line to new 115-kV structures. Phase 3 construction activities included sites requiring jurisdictional water permits along Segments VIG1 through VIG8.



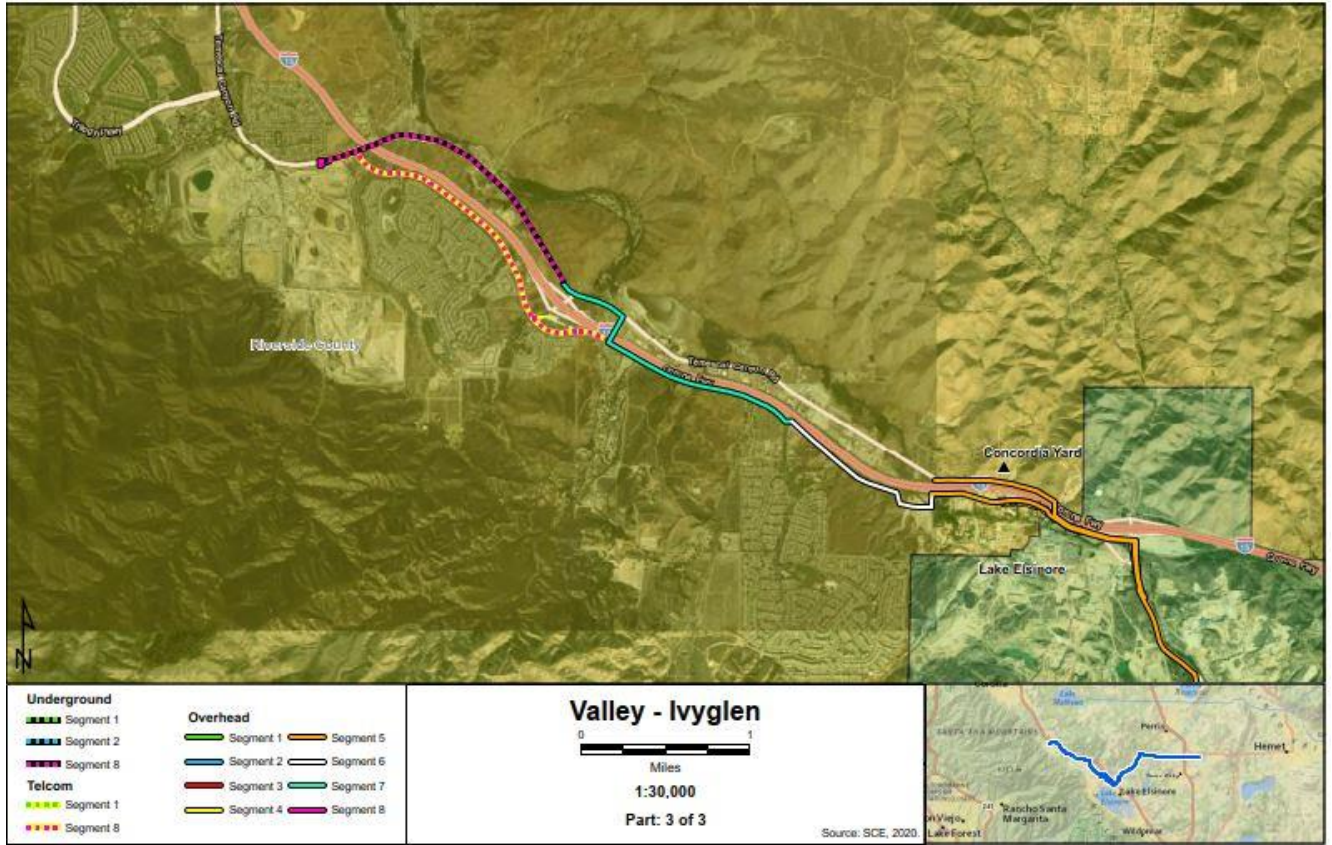


Figure 1. Subtransmission Line Route

1.2 Roles and Responsibilities of SCE, CPUC, and the WSP Monitoring Team

Roles and responsibilities described in Chapter 2 of the MMCRP were implemented during construction. Mitigation monitoring took place to ensure that MMs and PCs identified in the Final EIR were implemented as proposed.

1.2.1 SCE

SCE, as the project applicant, had the primary responsibility to ensure compliance with its aspects of the Compliance Plan and relevant local, state, or federal regulations or authorizations. In addition, SCE was required to obtain and comply with all required permits and approvals. The CPUC monitored SCE's compliance by verifying that SCE had adequately implemented MMs and PCs and that construction and operation activities were consistent with the Final EIR's project description.

SCE Project Manager, Michael Bass, provided overall direction, management, leadership, and corporate coordination for the project. He was responsible for the project construction schedule and ensured the project was completed as required by project contract documents and conditions, including PCs, MMs, and permit requirements.

SCE Environmental Project Manager (EPM), Marcus Obregon, was responsible for developing and implementing preconstruction environmental planning, permitting, and compliance activities. SCE's environmental consultant, Wilson Construction, supported the EPM with onsite monitoring and was ultimately responsible for ensuring SCE's construction crews maintained compliance with all project permits.

1.2.2 CPUC

The CPUC Project Managers, Patricia Kelly and Michael Rossauer, provided SCE and the WSP monitoring team with direction and clarification regarding protocols. In addition, they were responsible for reviewing and issuing Notice to Proceed (NTP) authorization letters, reviewing and approving Minor Project Refinements (MPRs), and issuing Non-Compliance Reports (NCRs).

1.2.3 WSP Monitoring team

The WSP monitoring team consisted of the Compliance Manager, Deputy Compliance Manager, Compliance Monitors, and office support staff. WSP's Compliance Managers, Chuck Cleeves (2020-2021) and Fernando Guzman (2022-completion) were SCE's points of contact and were responsible for overseeing all monitoring activities. In addition, the Compliance Manager was responsible for direct communication with the CPUC, including preparing monthly compliance reports. Other responsibilities included:

- Managing the field monitoring team
- Reviewing compliance documentation
- Reviewing NTP and MPR requests
- Providing the CPUC with recommendations for approval

WSP's Deputy Compliance Manager supported the Compliance Manager by reviewing preconstruction compliance materials, NTP and MPR requests, compliance monitoring reports, and survey results.

The CPUC Compliance Monitor, Vince Semonsen of Ecotech Resources Inc., performed onsite monitoring, reported compliance issues, and prepared monitoring reports. Additionally, he provided field input on NTP or MPR requests. Furthermore, various resource specialists and office staff assisted in reviewing plans or documents as needed.

1.3 Coordination and Communications

In field communications were conducted by the CPUC, WSP, and SCE/contractor field representatives in accordance with the MMCRP. As such, the CPUC, WSP, and SCE held regular teleconference meetings before and during construction to discuss the project's construction schedule, compliance, and changes.

Verbal warnings and written communications (emails and photographs) were utilized to notify SCE and its contractors of non-compliance activities. Meanwhile, field observations were logged into a site inspection report by the CPUC Compliance Monitor for every site visit. The Compliance Monitor also regularly communicated with SCE's environmental consultant and other project personnel during site visits as needed. All field observations by the Compliance Monitor were then included as an attachment to the compliance report WSP prepared monthly.

In addition, a CPUC VIG Project web site was regularly updated to reflect ongoing Project construction activities (<https://ia.cpuc.ca.gov/environment/info/ene/ivyglen/ivyglen.html>). The project's MMCRP, NTPs, MPRs, and Monitoring Reports were available via the website.

SCE also provided daily species and incident reports, weekly status updates on the project, monthly compliance reports, nesting bird trackers, Storm Water Pollution Prevention Plan (SWPPP) reports, and spill logs.

2 CEQA Compliance

In the CPUC's Final Decision to approve the project, the Mitigation Monitoring and Reporting Plan was adopted, as presented in Chapter 10 in the Final EIR. The Mitigation Monitoring and Reporting Plan list all MMs and PCs that an applicant is required to implement for the project to reduce potential impacts to less than significant. The CPUC and WSP then developed the MMCRP, with input from SCE, to serve as a working guide to maintain environmental compliance for the project and included specific protocols, guidelines, and standard procedures for environmental compliance with the CEQA document.

2.1 Potential Significant Impacts

The Final EIR identified potentially significant impacts in several resource sections. Below is a summary of the various potential significant impacts and MMs or PCs that were identified to reduce these impacts

Air Quality. Potential significant impacts included violation of air quality standards for particulate (PM₁₀ and PM_{2.5}) emissions and a cumulatively considerable net increase in nitrogen oxide (NO_x), reactive organic gas (ROG), and PM₁₀ emissions within the South Coast Air Quality Management District (SCAQMD). SCE was required to implement MM AQ-1, a measure requiring minimizing nitrogen oxides and particulate matter emissions from off-road diesel-powered construction equipment

greater than 150 horsepower used during subtransmission line or access road construction to meet Tier 4 interim or Tier 4 off-road emissions standards. In addition, implementation of MM AQ-2 required mitigation through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs for every pound of NOX over the SCAQMD regional significance threshold of 100 pounds per day, as measured per project. Furthermore, MM AQ-3 required the implementation of a Dust Control Plan to minimize fugitive dust generation, and MM AQ-4 was not applicable since Staging Yard VIG13 was not suitable for the VIG Project and, therefore, not utilized.

Biological Resources. Potentially significant impacts to biological resources included impacts to special status species (including burrowing owl and California gnatcatcher), riparian habitat or sensitive natural communities, federally protected wetlands, and wildlife migration corridors or nursery sites. The VIG Project could also conflict with local policies or ordinances protecting biological resources.

To reduce potential impacts to biological resources to less than significant, SCE implemented APM BIO-1 (pre-construction surveys), APM BIO-2 (minimize impacts on vegetation), APM BIO-3 (biological monitoring), APM BIO-4 (nesting bird surveys), APM BIO-5 (San Diego desert woodrat avoidance), APM BIO-6 (burrowing owl surveys), APM BIO-7 (SWPPP measures), APM AQ-1 (minimization of fugitive dust, including vehicle speed limits), and APM GEN-1 (Worker Environmental Awareness Plan [WEAP]). In addition, SCE was required to implement MM BIO-1 through MM BIO-14:

MM BR-1 required all project-related construction activities to be restricted to approved access roads and construction areas that are clearly indicated, and all sensitive resources to be clearly marked and avoided.

MM BR-2 required preconstruction surveys for special status species.

MM BR-3 required biological monitoring during construction by CPUC-approved qualified biologists.

MM BR-4 limited the impacts on native vegetation and trees, thereby also reducing impacts on special status wildlife habitats by limiting habitat removal.

MM BR-5 required SCE to implement California gnatcatcher surveys and avoid its habitat.

MM BR-6 required oak tree protection measures during construction.

MM BR-7 required SCE to develop a habitat restoration and monitoring plan prior to construction and mitigate for impacts on specific special status plants, trees, and natural communities that may be important to native wildlife habitats.

MM BR-8 required surveying for special status plant species and avoidance during construction.

MM BR-9 required the development of a noxious and invasive species control plan.

MM BR-10 provided measures to prevent entrapment of wildlife in project trenches and other excavations as well as to protect wildlife by preventing access to project-related trash.

MM BR-11 required SCE to develop an agency-approved Nesting Bird Management Plan before the start of construction if any portion of the Project was scheduled to occur during the general bird breeding season.

MM BR-12 required SCE to implement burrowing owl surveys and avoid its habitat.

MM BR-13 required SCE to keep project areas free of trash and debris.

MM BR-14 required SCE to enter an agreement with RCA and receive USFWS and CDFW concurrence to allow coverage of the VIG Project's obligations under the MSHCP on the castle and Cooke property.

MM BR-18 required SCE to implement all project commitments except in cases where they were superseded or modified by mitigation measures.

Cultural Resources. The VIG Project could significantly impact historical, archaeological, or paleontological resources and human remains. In order to reduce impacts to less than significant, SCE was required to implement the following cultural resources mitigation measures:

MM CR-1a required SCE to conduct cultural resource surveys for all areas to be disturbed that had not already been surveyed for cultural resources.

MM CR-1b required SCE to fence off and avoid known cultural resources except for site P33-000714).

MM CR-2 included Native American monitoring and required that qualified archaeologists monitor cultural resources mitigation and ground-disturbing activities in culturally sensitive areas as necessary during construction.

MM CR-4 required SCE to retain a qualified cultural resource consultant and submit their resumes to CPUC for approval.

MM CR-5 required SCE to follow a paleontological resource discovery protocol if a previously unknown paleo resource was discovered.

MM CR-6 required SCE to avoid impacts to contributing elements of P33-000714. Therefore, these areas required establishment as Environmentally Sensitive Areas.

MM CR-7 required SCE to follow necessary procedures for the unanticipated discovery of human remains. The procedures must adhere to CEQA Guidelines section 15064.5(e); PRC sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code section 7

Geology, Soils, and Mineral Resources. No potentially significant impacts

Greenhouse Gases. No potentially significant impacts.

Hazards and Hazardous Materials. Potentially significant impacts resulting from project construction and operations included exposing the public or environment to contaminants and an increased risk of wildfire and impairing implementation of an emergency response or evacuation plan. As a result, SCE incorporated PC-B 1, which required SCE to develop a WEAP. In addition, to reduce potentially significant impacts to less than significant, MM HZ-2 required SCE to submit a Contaminated Soil/Groundwater Contingency Plan to address unanticipated unearthing or exposure of buried hazardous materials, contamination, or contaminated groundwater. MM HZ-3, required SCE to contact affected landowners regarding the construction of underground facilities. Finally, MM HZ-4 required the applicant to develop a Fire Control and Emergency Response Plan.

Hydrology and Water Quality. Potentially significant impacts resulting from construction activities associated with the VIG Project (e.g., grading access roads, trenching for underground 115-kV subtransmission lines, excavation for pole removal or installation, staging area preparation, etc.) included the release of hazardous materials or sediment to water bodies or drainages. Therefore, the equipment used for these activities had the potential to adversely affect water quality because it could release hazardous

substances and be used to transport sediment. Additionally, grading and excavation operations would alter drainage in the grading area. Still, most ground disturbance would be distributed along the entire project area in small work areas (as described in the Final EIR Section 4.9) such that minimal changes to drainage patterns would occur.

Conversely, access roads and retaining walls required grading that could increase runoff, flooding, or ponding. Roads may also cross and alter drainages by, for example, blocking them with the roadway and associated retaining wall. As a result, this could also cause ponding and flooding on and off site.

Accordingly, in addition to implementing project-specific BMPs per the SWPPPs, MM WQ-5 required SCE to maintain the volume and connectivity of drainages crossed by access roads to reduce the risk of flooding. MM WQ-2 outlines specific procedures to be implemented for drainage crossings. MM WQ-3 requires implementing erosion control measures, which would also reduce the potential for stormwater to cause flooding. MM BR-7 required restoration and revegetation of temporarily disturbed areas, increasing percolation, and decreasing runoff changes. Furthermore, SCE was required to obtain all necessary regulatory permits before construction and submit copies to the CPUC for verification.

Land Use and Planning. No potentially significant impacts.

Noise. Potentially significant impacts related to noise included an increase in ambient noise levels during construction. To reduce potentially significant impacts to less than significant, SCE was required to implement the following MMs:

MM NV-1: Before the start of construction, SCE shall prepare and submit to the CPUC a Noise Control Plan, which shall detail the frequency, location, and methodology for noise monitoring prior to and during the proposed construction activities, such as for activities within the Cities of Lake Elsinore and Perris.

MM NV-2: If blasting is proposed, SCE shall develop a blasting mitigation and monitoring plan to be implemented during blasting activities for the Valley-Ivyglen project.

In addition, SCE implemented PC-H, which required SCE to employ noise reduction and control practices during construction to ensure that the temporary increase in ambient noise did not exceed the maximum allowable levels identified by the applicable jurisdiction.

Population and Housing. No potentially significant impacts.

Public Services and Utilities. Potentially significant impacts related to public services and utilities included decreased performance or response times from fire protection and emergency response, insufficient water supplies, and noncompliance with federal, state, or local statutes and regulations related to solid waste. As a result, to reduce impacts to less than significant, the applicant was required to implement MM HZ-4 (described above) and MM BR-1 (Limit Construction to designated Areas). Additionally, PC-E: Grading Plan required SCE to consult with the Riverside County Flood Control and Water Conservation District regarding grading plans for the construction and operation of the VIG Project. Furthermore, PC-F: Geotechnical Study, Soil Testing, and Seismic Design Standards were required.

Recreation. No potentially significant impacts.

Transportation. Potentially significant impacts related to transportation could result from lane closures or lane reductions during construction of the VIG Project, incidents or accidents involving helicopters, inadequate emergency access, decrease in the performance or safety of public transit, bicycle, or pedestrian facilities, and contribute to traffic safety hazards. As a result, to reduce impacts to less than significant, the applicant was required to implement MMs TT-1 through TT-6, which required SCE to develop a Traffic Control Plan, Highway Closure Plan, and Helicopter Lift Plan. Additionally, SCE was required to notify emergency service providers of road closures at least one week before the road closure. Furthermore, SCE was required to restore and repair damaged roads to pre-project conditions. Moreover, SCE was required to obtain a no-hazard determination from the FAA.

2.2 Permits

The applicant was also required to obtain several permits from various federal, State, and local agencies for the project, as summarized in Table 1. WSP tracked the necessary permitting requirements to ensure that all applicable agency permits and approvals were issued prior to construction. In addition, SCE provided copies of all permits to the CPUC.

Table 1. VIG Summary of Permit Requirements

Permits	Agency	Purpose
Federal		
Clean Water Act (CWA) Section 404 Nationwide Permit	U.S. Army Corps of Engineers	Section 404 regulates discharge of “fill” into “Waters of the United States”. Section 401 requires that any applicant for a Section 404 Permit also obtain a Clean Water Act Certification from the state (see below).
Federal Endangered Species Act Incidental take Permit or Authorization under Natural Communities Conservation Plan (NCCP)	United States Fish and Wildlife Service	Special status species surveys and mitigation as required, take authorization (i.e., Incidental Take Permits, if required), and informal or formal consultation.
Federal Aviation Regulations Part 77 (Objects Affecting Navigable Airspace), Part 133 (Rotorcraft External-Load Operations)	Federal Aviation Administration	Consultation regarding objects that may affect navigable airspace. Consultation to determine whether Congested Area Plan approval for helicopter external-load operations is required.
State		
California Public Utilities Code Section 1001 et seq. and CPUC General Order No. 131-D	CPUC	CEQA review and overall approval of the proposed project, including approval of a CPCN or CPCN exemption and approval of a Permit to Construct.

Table 1. VIG Summary of Permit Requirements

Permits	Agency	Purpose
Clean Water Act Section 401	Regional Water Resources Control Board – Region 8	Required for discharge into Waters of the U.S. or Waters of the State
Section 402 of the Federal Clean Water Act, National Pollutant Discharge Elimination System General Permit for Discharge of Construction Related Storm Water	State Water Resources Control Board	Management of storm water during construction, Notice of Intent to prepare a Stormwater Pollution Prevention Plan (SWPPP) and compliance with the current Construction General Permit.
California Department of Fish and Game Code Section 1600 Lake and Streambed Alteration Agreement	California Department of Fish and Wildlife	Streambed Alteration Agreement when an activity will: divert or obstruct the natural flow of any river, stream, or lake, change the bed, channel, or bank of any river, stream, or lake, use material from any river, stream, or lake, or deposit or dispose of material into any river, stream, or lake.
California Streets and Highways Code 660 to 711.21, California Code of Regulations 1411.1 to 1411.6	California Department of Transportation	Caltrans requires that all work done within or spanning a state or interstate highway Right-of-Way (ROW) receive an encroachment permit. Permits are also required for oversize and/or overweight truckloads that exceed legal load limits as defined by the California Vehicle Code.
National Historic Preservation Act Section 106, California Register of Historical Resources, California Public Records Act	State Historic Preservation Office	Consultation for Section 106 of the National Historic Preservation Act. Consultation regarding known cultural resources. Consultation regarding the listing of cultural or historic resources in the National Register of Historic Places or California Register of Historical Resources
Native American Consultation	Native American Heritage Commission	Identifies the local recognized Native American groups.
Local		
Public water pipelines	Elsinore Valley Municipal Water District	Permit and consultation to relocate water pipeline at proposed substation site. The pipeline is owned and operated by EVMWD.

Table 1. VIG Summary of Permit Requirements

Permits	Agency	Purpose
Air pollution and greenhouse gas emissions including fugitive dust.	South Coast Air Quality Management District	The stationary diesel generator at the proposed substation may require a SCAQMD permit. Rule 403 Permit for fugitive dust. Notification of demolition and asbestos removal (Rule 1403) for demolition of structures at horse ranch.
Threatened or endangered species (including the Stephen's kangaroo rat), and conservation plans.	Riverside County Habitat Conservation Agency	Consultation with RCHCA to determine "take" permit (Federal and State Endangered Species Acts) and mitigation requirements for proposed project areas in Riverside County that would cross habitat reserves and other areas covered by a Habitat Conservation Plan.
Protected trees, aqueduct crossings, and grading in unincorporated Riverside County	Riverside County	Permits required for tree removal (e.g., mature trees and oak woodlands). The grading permit would incorporate requirements for spill protection
All buildings constructed or demolished in unincorporated Riverside County	Riverside County Department of Building and Safety	Demolition permit required for removal of the existing horse ranch facilities on the proposed substation site including asbestos clearance permit. Permit required for design of the perimeter wall to ensure consistency with the surrounding community
Installation of wastewater treatment systems, abandonment and abatement of septic systems, and destruction of water wells.	Riverside County Department of Environmental Health	Septic system installation permit required for the new septic system at the substation site. Closure permit required for the abandoned and abatement of existing septic systems. Permit required for destruction of onsite water well.
Encroachment on road crossings, and other public ROWs (including excavation along ROWs)	Riverside County Transportation Department	Encroachment Permit
Flood control, Post Construction BMP's	Riverside County Flood Control and Water Conservation District	Encroachment Permit, Water Quality Management Plan compliance

Table 1. VIG Summary of Permit Requirements

Permits	Agency	Purpose
Encroachment on railroad ROW	Riverside County Transportation Commission	Encroachment Permit
Construction activities in public ROW or easements, tree protection, and grading within the city limits.	Cities of Lake Elsinore, Menifee, Perris, and Wildomar (ministerial)	Encroachment Permit, tree removal permits, and grading permits

Source: CPUC, 2020 MMCRP.

Key:

Caltrans = California Department of Transportation

CPUC = California Public Utilities Commission

CEQA = California Environmental Quality Act

EVMWD = Elsinore Valley Municipal Water District

NCCP = Natural Community Conservation Plan

RCHCA = Riverside County Habitat Conservation Agency

ROW = right-of-way

SWPPP = Storm Water Pollution Prevention Plan

3 Construction and Compliance

As presented in Section 2, the intent of the monitoring program was to ensure compliance with all Final EIR Mitigation Measures (MM) and Project Commitments (PCs) 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 2.3. These MMs, PCs, compliance plans, and permit conditions 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 3.1 Pre-construction compliance activities,
- Section 3.2 Construction activities,
- Section 3.3. Compliance during construction activities, and
- Section 3.4 Post-construction compliance activities.

3.1 Preconstruction Compliance

3.1.1 Compliance Plans

In addition to obtaining the necessary regulatory permits and approvals (as identified in Section 2.2), several mitigation measures or PCs required the applicant to develop specific compliance plans. As such, prior to construction, SCE submitted various compliance plans to the CPUC to satisfy federal, state, and local agency mitigation and permit requirements. Once submitted, WSP reviewed the compliance plans on behalf of CPUC to ensure appropriate environmental protection would occur. Upon CPUC approval, SCE distributed the approved plans to applicable jurisdictions in accordance with relevant MMs. In addition, SCE updated compliance plans as necessary in response to changing Project needs. Moreover, compliance with the plans during construction and post-construction restoration was monitored by the WSP compliance monitoring team and by a third-party compliance monitor. A list of

compliance plans implemented during construction and required compliance verification is presented in Table 2.

Item	MM or PC	Responsible Action Agency	VIG Project Implementation
Blasting Mitigation and Monitoring Plan (as necessary)	MM NV-2	CPUC	No – blasting activities were not necessary for the VIG Project. Therefore, a Blasting Mitigation Monitoring Plan was not required.
Blasting Plan (as necessary)	MM WQ-1	CPUC	No – blasting activities were not necessary for the VIG Project. Therefore, a Blasting Plan was not required.
Contaminated Soil/Groundwater Contingency Plan	MM HZ-2	CPUC	Yes
Cultural Resources Monitoring and Treatment Plan	MM CR-1b	CPUC	Yes
Dust Control Plan	MM AQ-3	CPUC	Yes
Fire Control and Emergency Response Plan	MM HZ-4	CPUC	Yes
Habitat Restoration and Revegetation Plan	MM BR-7	CPUC	Yes
Helicopter Lift Plan	MM TT-4	CPUC	Yes
Highway Closure Plan	MM TT-3	Caltrans	Yes
Invasive Plant Management	MM BR-9	CDFW	Yes
Lake Street Landscape Plan	MM AES-4	CPUC	Yes
Nesting Bird Management Plan	MM BR-11	CDFW, USFWS	Yes
Noise Control Plan	MM NV-1	CPUC	Yes
Paleontological Resource Monitoring Plan	MM CR-4	CPUC	Yes
SWPPP #1 (yards)	MM BR-15	Santa Ana Regional Water Quality Control Board	Yes
SWPPP #2 (project)	MM BR-15	Santa Ana Regional Water Quality Control Board	Yes

Table 2. VIG: Plans and Other Documentation Required for Compliance Verification

Item	MM or PC	Responsible Action Agency	VIG Project Implementation
Traffic Management and Control Plan	MM TT-1	Caltrans	Yes
Worker Environmental Awareness Program	PC HAZ-1	CPUC	Yes

Source: CPUC, 2020 MMCRP.

Key:

PC = Project Commitment

CDFW = California Department of Fish and Wildlife

CPUC = California Public Utilities Commission

MM = Mitigation Measure

USFWS = United States Fish and Wildlife Service

3.1.2 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 but not limited to the list below. Many of these practices were also included as permit requirements or mitigation measures with ongoing/time-sensitive requirements.

- **Identification of Underground Utilities.** SCE or their contractor contacted Underground Service Alert to identify underground utilities in the construction zones. If SCE identified an underground utility as 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.** Prior to any construction, equipment, or crew mobilization at each work site, SCE marked resource and work areas with staking or flagging to identify the limits of work and biological resources. As required by the noted mitigation, lead biologists established avoidance buffers to minimize biological resource impacts. SCE provided CPUC 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 Compliance Monitor.
- **SWPPP BMPs.** Installation of stormwater best management practices at worksites as required by the Project Storm Water Pollution Prevention Plan.
- **Worker Environmental Awareness Plan Training.** A WEAP was prepared to educate on-site workers about the proposed Project's sensitive environmental issues. Throughout the construction, SCE/contractor was responsible for ensuring that all on-site project personnel received the WEAP training before beginning work. SCE/contractor maintained a list of all personnel who completed the WEAP training. This list was made available to the CPUC Compliance Monitor upon request. Additionally, brief WEAP refresher presentations were held at morning tailboards to help construction crews and other personnel maintain awareness of environmental sensitivities and requirements.

3.2 Construction

Construction activities are described in this section by NTP.



Figure 2. Perimeter fencing established at the 74 Central Yard, July 21, 2020



Figure 4. Paving along SR 74, September 17, 2020



Figure 3. Conduit installation along State Route (SR) 74, August 23, 2020



Figure 5. Concrete pour of TSP 449, December 16, 2020



Figure 7. Undergrounding activities at the intersection of Indian Truck Trail and Temescal Canyon Road, March 17, 2021



Figure 6. Newly installed TSP 45 with BMPs, January 20, 2021

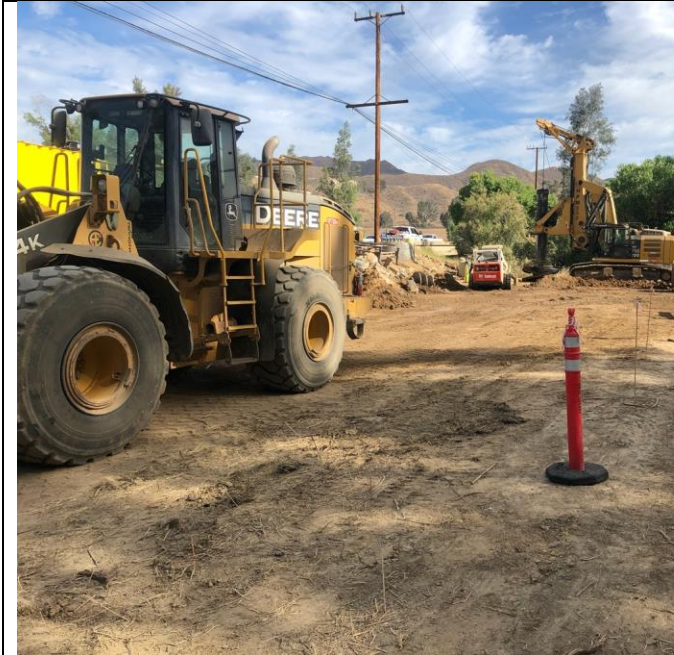


Figure 8. TSP 2161 work area with orange markers delineating a nesting bird buffer, June 9, 2021



Figure 9. Foundation installation for TSP 370, August 12, 2021



Figure 10. Drilling at Pasadena St. prior to vault installation, September 16, 2021



Figure 11. Discharge area for the dewatering operation in Segment VIG4, October 6, 2021



Figure 13. Dust suppression performed on access roads near Horsethief Canyon, November 18, 2021

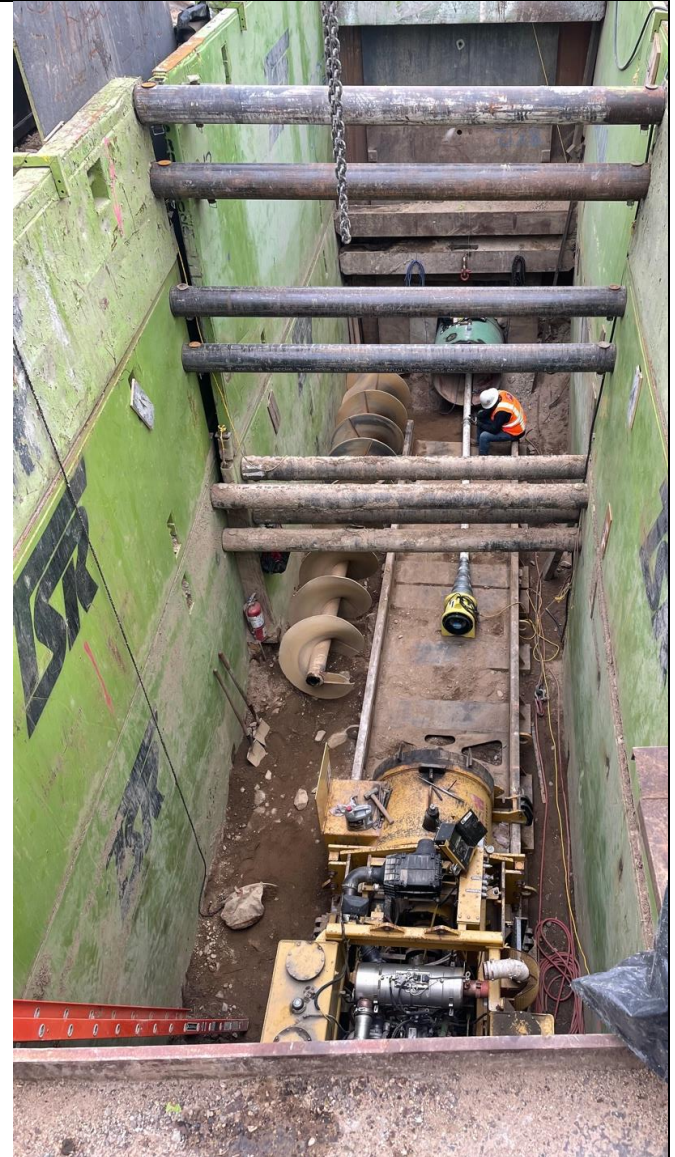


Figure 12. Bore activities near the Ivyglen Substation, October 6, 2021

3.2.1 Notice to Proceed Request

The applicant must obtain CPUC authorization before initiating construction activities through the NTP process. The NTP process involves the applicant submitting an NTP request to the CPUC and the CPUC Project Manager issuing an NTP authorization letter. The CPUC Energy Division will only issue an NTP for a project if all applicable preconstruction requirements for the relevant stage of the project are satisfied. In addition, resource-specific plans and reports must comply with the goals, performance standards, and associated MMs and PCs.

In general, multiple NTPs are issued for large-scale projects with various components allowing for a phased construction review process where compliance with all applicable mitigation measures and conditions are documented. The VIG Project included various components (material yards, substations, distribution, telecommunications, and transmission). Accordingly, SCE requested three NTP requests from the CPUC to authorize the start of certain phases of the VIG Project. The applicant submitted NTP

requests with the following information, as described in the MMCRP, to confirm that the applicant complied with the CEQA document:

- Descriptions of the work to be performed, including a brief comparison of the proposed work and the project component, as described in the Final EIR;
- Descriptions of all ancillary activities required for the project component or components (e.g., electrical, plumbing, excavation, paving, landscaping, site restoration);
- Identification of any staging areas that would be used during construction;
- Detailed descriptions of the location of the project component or components covered in the NTP, including maps, photographs, and other supporting documents;
- An estimate of the area of total new land disturbance associated with project component or components;
- The date of expected construction and the duration of work;
- The anticipated number of construction workers, including the total workers and peak number;
- The anticipated equipment required for construction;
- Verification that all relevant preconstruction MMs and PCs have been completed or implemented;
- Verification that all applicable jurisdictional permits or agency approvals have been obtained for the work covered by the NTP request, if required;
- If some preconstruction compliance items could not be completed prior to issuance of the NTP, an identification and description of the outstanding submittals, as well as how they would be completed and approved in a timely manner prior to construction; and
- Up-to-date biological resource surveys or a commitment to survey and submit results prior to construction.

WSP reviewed the applicant-provided NTP requests and the applicable preconstruction requirements to ensure completeness. Additional information or clarification was requested from the applicant if needed. The NTPs that were approved for the project are described in Table 3.

NTP Number	Approval Date	Description
1	June 30, 2020	NTP-1 activities included vegetation management, establishing and temporarily using the Valley Substation Yard, Valley Yard South, 74 Central Yard, and Concordia Yard in Riverside County. Furthermore, construction within the general disturbance areas at the Valley Substation and in Segments VIG1 to VIG3, with the exclusion of locations that require jurisdictional water permits, included: the installation of new circuit breakers, 115-kV conductor, lightweight steel poles, tubular steel poles, riser poles, guy poles, underground duct banks, telecommunication fiber optic lines, relocation of existing distribution lines, and construction-related helicopter activities.
2	September 8, 2020	NTP-2 activities included vegetation management, establishing and temporarily using the Valley Substation Yard, Valley Yard South, 74 Central Yard, and Concordia Yard in Riverside County. Furthermore, construction

Table 3. Notices to Proceed

NTP Number	Approval Date	Description
		within the general disturbance areas at the Ivyglen Substation and in Segments VIG4 to VIG8, with the exclusion of locations that require jurisdictional water permits, included: installation of new circuit breakers, 115-kV conductor, lightweight steel poles, tubular steel poles, riser poles, guy poles, wood shoofly poles, underground duct banks, telecommunication fiber optic lines, relocation of existing distribution lines, and construction-related helicopter activities.
3	October 29, 2020	NTP-2 activities included vegetation management and temporary use of the Valley Substation Yard, Valley Yard South, 74 Central Yard, and Concordia Yard in Riverside County. Furthermore, construction within the general disturbance areas at sites requiring jurisdictional water permits along Segments VIG1 to VIG8 included: the installation of new circuit breakers, 115-kV conductor, lightweight steel poles, tubular steel poles, riser poles, guy poles, wood shoofly poles, underground duct banks, telecommunication fiber optic lines, relocation of existing distribution lines, and construction-related helicopter activities.

3.2.2 Minor Project Refinement Request

The applicant prepared several MPR requests and submitted them to the CPUC and WSP for review. The MMCRP outlined procedures and requirements for MPR requests. The CPUC and WSP reviewed all MPR requests to ensure any proposed deviations from the approved project were consistent with approved CEQA requirements. Correspondingly, the MPRs did not trigger additional permit requirements, did not increase the severity of an impact or create a new impact, and were within the geographic scope of the Final EIR.

WSP reviewed MPR requests for completeness, and additional information or clarification was requested from the applicant as needed. After review and analysis, WSP would recommend approving or denying a request to the CPUC. Table 4 summarizes the MPRs submitted for the VIG Project.

Table 4. Minor Project Refinements

MPR Number	Associated NTP	Approval Date	Description
1	NTP-1	August 11, 2020	MPR #1 involved an approximately 5.9-acre staging area located at 14570 Concordia Ranch Road, Lake Elsinore, CA 92530 (Concordia Yard), to service the western portion of the Project. SCE obtained a lease agreement with the landowner to use the Concordia Yard, a heavily disturbed vacant lot with minimal vegetation cover, as a construction staging area. SCE needed this additional Construction Work Area (i.e., Concordia Yard) because none of the 11 approved project staging areas (80.4 acres) listed in the Final EIR were suitable as a staging area for the westerly portion of the VIG Project.
2	NTP-1	August 14, 2020	MPR #2 activities involved expanding the general disturbance area at several work area locations so that SCE can perform the work described in Section 2.3.1.1 of the Final EIR within work areas of

Table 4. Minor Project Refinements

MPR Number	Associated NTP	Approval Date	Description
			the size identified in Table 2-5 of the Final EIR. Furthermore, additional access roads at Structures 129E and 131E were used to facilitate structure installation.
3	NTP-2	November 25, 2020	MPR #3 activities involved expanding the general disturbance area at several work area locations so that SCE can perform the work described in Section 2.3.1.1 of the Final EIR within work areas of the size identified in Table 2-5 of the Final EIR. The primary activities included installing tubular steel poles, lightweight steel poles, wood poles, guard poles, guy poles, guy anchors, conductor, fiber optic, a telecommunication vault, and the transfer of distribution conductor from existing poles to the new 115-kV structures. Furthermore, a portion of the telecommunication fiber optic line for Segment VIG7 was modified from an underground to an overhead configuration.
4	NTP-2	October 2, 2020	MPR #4 involved an alternative shoofly route (Option 2) on the north side of Temescal Canyon Road instead of the south side of Temescal Canyon Road (Option 1). The route was within the public right-of-way and did not require additional property acquisition. Although Option 1 was the preferred route, unforeseen difficulties in property acquisition prevented its use. Option 1 required the acquisition of four private parcels, at least one of which would require condemnation. Furthermore, COVID-19 restrictions significantly delayed the court condemnation process, preventing the property from being acquired in time to meet the outage-driven construction schedule.
5	NTP-1 and NTP-2	May 3, 2021	MPR #5 involved installing the 115-kV line and telecom underground using 115-kV risers and telecom risers. SCE pursued this MPR as requested by Lake Elsinore city officials, and in response to language in the CPUC President’s concurrence for the necessity of the Alberhill system project that states, SCE shall “...engage with all of the affected cities to address community concerns and find solutions and compromises that work in favor of everyone, even if that means alterations to the proposed project.”
6	NTP-1	December 1, 2020	MPR #6 involved additional work areas and land disturbances not included in NTP-1 but necessary to construct the Project work described in Section 2.3.1.1 of the Final EIR. The primary activities included installing wood poles, guy anchors, conductor, fiber optic, and the transfer of distribution conductor from existing poles to the new 115-kV structures. Construction of these components was completed in a manner consistent with the descriptions contained in the Final EIR.

Table 4. Minor Project Refinements

MPR Number	Associated NTP	Approval Date	Description
7	NTP-2	December 18, 2020	MPR #7 involved additional work areas and land disturbances not included in NTP-2 but necessary to construct the Project work described in Sections 2.3.1.1 and 2.3.1.2 of the Final EIR. The primary activities included installing guy anchors, conductor, fiber optic, and telecommunication and subtransmission vaults. Construction of these components was accomplished in a manner consistent with the descriptions contained in the Final EIR.
8	NTP-2	January 21, 2021	MPR #8 involved additional work areas and land disturbances not included in NTP-2 but necessary to construct the Project work described in the Final EIR. The primary activities included installing distribution poles, guy anchors, distribution conductor, and distribution apparatus. In addition, the work involved the installation of a temporary transformer bank inside the fence line of the Ivyglen Substation. Construction of these components was accomplished consistent with the descriptions contained in the Final EIR. As a result, this MPR provided uninterrupted, safe, and reliable power supply to local customers served by distribution circuits connected to Ivyglen Substation, at times when the Fogarty-Ivyglen 115-kV line (i.e., currently the sole source of 115-kV power to the substation) was taken out of service during construction of the VIG Project.
9	NTP-1 and NTP-2	March 2, 2021	MPR #9 involved additional work areas and land disturbances not included in NTP-2 but necessary to construct the VIG Project as described in the Final EIR. The primary activities included installing guy anchors, conductor, and fiber optic telecommunications. Construction of these components was accomplished consistent with the descriptions contained in the Final EIR.
10	NTP-2	February 8, 2021	MPR #10 included further refinements to the previously approved MPR #8. MPR #8 requested additional work areas and disturbances for installing a temporary 33-kV power circuit from a nearby pole line into the Ivyglen Substation. Correspondingly, MPR #10 involved adding two new work areas where a qualified arborist would remove tree branches of ornamental species on the north side of Temescal Canyon Road—removing the tree branches allowed for the 48 inches of clearance between the electrical conductor and vegetation as required by Rule 35 of General Order 95. The work areas were outside of the general disturbance area of the VIG Project but consistent with the sizes described in Table 2-5 of the Final EIR.
11	NTP-2	March 29, 2021	MPR #11 involved additional work areas and land disturbances not included in NTP-2 but necessary to construct the VIG Project as described in the Final EIR. The primary activities included installing poles, guy anchors, conductor, and fiber optic cable. Construction of these components was accomplished consistent with the descriptions contained in the Final EIR.

Table 4. Minor Project Refinements

MPR Number	Associated NTP	Approval Date	Description
12	NTP-2	March 29, 2021	MPR #12 involved additional work areas and land disturbances not included in NTP-2 but necessary to construct the VIG Project as described in the Final EIR. The primary activities included installing poles, guy anchors, conductor, fiber optic cable, and telecommunication and subtransmission vaults. Construction of these components was completed in a manner consistent with the descriptions contained in the Final EIR.
13	NTP-2	May 24, 2021	MPR #13 involved additional work areas and land disturbances not included in NTP-2 but necessary to construct the VIG Project as described in the Final EIR. The primary activities included installing poles, guy anchors, and conductor. Construction of these components was accomplished consistent with the descriptions contained in the Final EIR.
14	NTP-2	June 15, 2021	MPR #14 involved additional work areas and land disturbances not included in NTP-2 but necessary to construct the VIG Project as described in Sections 2.3.1.1, 2.3.1.2, and 2.3.1.3 of the Final EIR. The primary activities included installing a conduit duct bank followed by a 115-kV underground subtransmission cable and telecom cable. The 115-kV and telecom duct bank east of vault 6001584 was installed via boring (Cased Bore) for approximately 346 feet. The bore entrance and exit points were within the previously approved subtransmission trenching work area. The boring machine bored an underground path and installed a 30–32-inch casing into which the conduit was placed. The conduit then connected to vault 6001584 to the west and the conduit in an open trench to the east. Construction of these components was completed in a manner consistent with the descriptions contained in the Final EIR.
15	NTP-1 and NTP-2	July 17, 2021	MPR #15 involved additional work areas and land disturbances not included in NTP-1 and NTP-2 but necessary to construct the VIG Project as described in the Final EIR. The primary activities included installing poles, guy anchors, conductor, capacitor banks, and fiber optic. In coordination with the landowner and the City of Lake Elsinore, soil excavation was proposed between 454E and 460E to accommodate the future realignment of Lake Street. The planned Lake Street realignment will parallel the VIG subtransmission line and be constructed at an elevation similar to the existing Lake Street. The ground elevation along the VIG alignment was as much as 30 feet higher than the future elevation. To avoid future modifications to the VIG line, SCE proposed excavating soil at 455E, 456E, 458E, and 460E so the structures can be installed at the required future ground elevation. Additionally, where needed, the Project excavated 30-foot-wide swaths underneath the path of the 115-kV conductor from 454E–460E to lower the ground elevation between structures and provide necessary ground clearance for the conductor and telecommunication wire. Construction of these components was

Table 4. Minor Project Refinements

MPR Number	Associated NTP	Approval Date	Description
			accomplished consistent with the descriptions contained in the Final EIR.
16	NTP-1 and NTP-2	August 12, 2021	MPR #16 involved additional work areas and land disturbances not included in NTP-1 and NTP-2 but necessary to construct the VIG Project as described in Sections 2.3.1.1 and 2.3.1.2 of the Final EIR. The primary activities included excavating soil and installing gabion baskets, fiber optic cable, and conduit. Construction of these components was completed consistent with the descriptions contained in the Final EIR.

3.3 Compliance During Construction

Compliance monitoring was performed prior to and during construction through email, phone conversations, meetings, site inspections, and various forms of documentation described in this document. Additionally, the applicant provided CPUC-approved biological, cultural, and paleontological monitors for daily monitoring. The CPUC compliance monitoring team conducted regular site inspections, either biweekly during construction or as determined by the WSP Compliance Manager, for a total of 35 site visits. The CPUC Compliance Monitor’s site visit reports were attached to a Monthly Report that WSP prepared each month for the CPUC.

3.3.1 Compliance Requirements During Construction

This section describes compliance activities performed as required by approved mitigation measures once CPUC granted construction authorization. Section 3.1 describes the preconstruction compliance requirements that had to be satisfied before construction at specific locations. These preconstruction compliance requirements were implemented throughout construction because the start of construction was phased over the years. Section 3.1.1 describes the various compliance plans that had to be submitted and approved before construction and their implementation. The construction and restoration of the project are shown in Section 3.4. The CPUC compliance monitoring team field validated the implementation of construction compliance requirements.

Aesthetics

- **MM AES-1: Staging Area Screening.** As described in Section 2.4.3 of the VIG Final EIR, construction of the Project required establishing temporary staging areas. As a result, NTP-1 authorized the establishment and temporary use of three staging areas (Valley Substation Yard, Valley Yard South, and 74 Central Yard) that were listed in the Final EIR and identified as suitable for the VIG Project. Additional temporary use of the Concordia Yard was requested by SCE and approved by the CPUC in MPR #1.
 - Valley Substation Yard: No screening was installed for reasons associated with substation safety; however, the yard was not visible from the street or sensitive receptors. Therefore, screening was not necessary.
 - Valley Yard South: This yard was already established and fenced since SCE previously used it to store materials.

- 74 Central Yard: This yard was a previously disturbed plot of land, and installation of perimeter fencing with screening was conducted.
- Concordia Yard: This yard was approved for temporary use in accordance with the approval of MPR #1, which included installing perimeter fencing and screening.
- **MM AES-2: Segment VIG2 Wood Poles and Undergrounding.** Power Engineers designed VIG2 to include the installation of wood poles except for the riser poles at the transition to overhead and the approximately 1.5-mile underground section.
- **MM AES-3: Glare Reduction.** Power Engineers designed the VIG Project to reduce color contrast between the project components and the surrounding landscape and visually unify the project components with the surrounding landscapes. As a result, the requirements of AES-3 were met.
- **MM AES-4: Lake Street Pole Placement and Landscaping.** Pole treatment/types were submitted to SCE (and CPUC) prior to procurement. Additionally, Wilson Construction met with the City of Lake Elsinore to negotiate requirements for the landscaping plan. As a result, a landscaping plan was prepared and submitted to SCE and the City for approval prior to performing construction on Lake Street. In addition, SCE provided coordination documentation with the City of Lake Elsinore to the CPUC.
- **MM AES-5: Night Lighting During Construction.** SCE prepared for night lighting management with best management practices and CPUC concurrence in the event night construction was required. SCE required nighttime construction for the installation of Underground Transmission and Telecom components. On October 6, 2021, SCE submitted to the CPUC revised encroachment permits obtained from the City of Lake Elsinore and the County of Riverside for the following dates and work hours:
 - **City of Lake Elsinore:** 10/07/2021 – Mid December: Segment VIG4 Underground work on 3rd & Pasadena. To minimize potential disruptions to traffic and transportation, crews worked nights to complete vault installations and bore drilling.
 - **County of Riverside:** 10/29/2021 – 10/31/2021: Segment VIG5 night outage for overhead work from 486E – 516E in Riverside County (4PM Saturday – 6AM Monday)
 - 11/13/2021 – 11/14/2021: Segment VIG5 night outage for overhead work from 486E – 516E in Riverside County (4PM – 6AM)

Additionally, the County of Riverside only required approval if work occurred within 0.25 mile of an inhabited dwelling. This work followed Temescal Canyon (VIG5) and abuts Pacific Clay, Jungle Island Paintball, and Temescal Canyon Rockery, but did not come within 0.25 mile of an inhabited dwelling.

Air Quality

- **MM AQ-1: Minimize NOX and PM Emissions from Off-Road Diesel Powered Construction Equipment.** Wilson maintained an equipment log in accordance with MM AQ-1, which was uploaded in FRED when the equipment was mobilized. Additionally, SCE maintained equipment according to manufacturers' specifications, and records were available upon request. Crew members carpooled to and from staging yards to construction sites to the extent feasible, following CDC and California OSHA Covid-19 guidelines for construction work.
- **MM AQ-2: Oxides of Nitrogen (NOX) Credits.** Wilson maintained an equipment spreadsheet to track actual daily emissions during construction and uploaded the spreadsheet to FRED weekly. Accordingly, SCE purchased and submitted documentation of the required Regional Clean Air

Incentive Market Trading Credits to the South Coast Air Quality Management District as necessary prior to the construction of each phase.

- **MM AQ-3: Dust Control Plan.** SCE prepared a Dust Control Plan approved by the CPUC on 4/6/2020 and implemented it during construction. The Dust Control Plan included restrictions for vehicle traffic speeds on unpaved roads, use of dust suppressants (water/ chemical stabilizers), graveling of yards, controlling and cleaning of trackout, covering soil truck loads and material stockpiles, and implementation of best management practices during high wind speed days. Compliance documentation was recorded in SWPPP logs and biological monitoring reports.
- **MM AQ-4: Odor Reduction at Staging Yard VIG13.** Staging Yard VIG13 was not available for use and was not used during the construction of the VIG Project. Therefore, this MM was not applicable.

Biological Resources

- **MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.** Wilson marked disturbance limits throughout the Segments VIG1 to VIG8. In addition, Environmentally Sensitive Areas were marked, staked, and monitored for compliance. Monitoring reports were prepared and uploaded to FRED. If additional disturbance was required outside the established construction areas, SCE submitted a notification and request to CPUC for approval.
- **MM BR-2: Preconstruction Surveys.** CPUC-approved biologists performed preconstruction surveys and reported the findings in FRED. Additionally, SCE used baseline information for the composition of vegetation communities and compliance with the Habitat Restoration and Revegetation Plan.
- **MM BR-3: Biological Monitoring During Construction.** During construction, Wilson provided schedules of upcoming work areas to determine a monitoring schedule. CPUC-approved biological monitors performed monitoring activities and communicated daily with the Wilson Construction Environmental Manager, Environmental Field Lead, and construction crew members. SCE reported the findings in FRED.
- **MM BR-4: Limit Removal of Native Vegetation Communities and Trees.** Wilson verified that appropriate staking and flagging were completed to ensure clearing, grading/ access road building, and construction remained within work limits. In addition, biological monitors documented that each work site was marked with staking or flagging to delineate the work boundaries and that the stakes or flagging remained in place during construction. SCE reported compliance documentation for MM BR-4 in FRED. This effort included areas where an impact to sensitive biological resources or jurisdictional waters, vegetation removal, trimming, or disturbance to vegetation could occur, as well as all ground disturbing work activities and initial “drive and crush” in work areas and access roads.
- **MM BR-5: California Gnatcatcher Protection Measures.** Wilson prepared a Project schedule using Riversidean sage scrub location information and historical gnatcatcher observations to identify avoidance areas. Additionally, biological surveys and monitoring data determined avoidance areas during construction. Survey results and monitoring reports were documented in FRED.
- **MM BR-6: Oak Tree Protection Measures.** The completion of engineering helped determine if oak tree removal was necessary. As a result, oak tree removal was not required to complete the VIG Project. If SCE required oak tree removal, an Oak Tree Removal Plan would have been prepared for review and approval by SCE and concurrence from CPUC. The Oak Tree Removal Plan would have included one year of maintenance and monitoring. Additionally, fencing or flagging trees for avoidance was conducted during construction. Wilson stayed out of the protected zone (5 feet

outside the dripline) and ensured no parking, storing, or operating equipment or tools were within the protected zones. If crews must work within the protected zone, it was conducted under the direction of an arborist. Accordingly, an arborist performed the necessary pruning. SCE uploaded monitoring reports to FRED. Moreover, a Riverside County Permit was not required because 1. No trees over 5000-foot elevation, 2. No trees along the county highway. As a result, the protection measures in this MM satisfied the requirements of the Riverside County Oak Tree Management Guidelines.

- **MM BR-7: Habitat Restoration and Revegetation Plan requirements.** The CPUC approved the Habitat Restoration and Revegetation Plan on 4/16/2020. SCE's contractor ensured compliance with the HRRP by overseeing a subcontractor that performed revegetation activities. Additionally, the contractor created a Restoration Execution Plan in FRED and performed inspections in accordance with the plan. Moreover, SCE implemented the HRRP for one year and documented progress towards success criteria.
- **MM BR-8: Special Status Plant Avoidance and Mitigation Measures.** MM BR-8 involved avoidance measures if project areas were not covered by the Western Riverside County Regional Conservation Authority (RCA) multiple species habitat conservation plan (MSHCP). Since the VIG Project (including yards) had full coverage under the MSHCP, this mitigation measure was not applicable.
- **MM BR-9: Invasive Plant Control Measures.** The CPUC approved the Invasive Plant Management Plan (IPMP) on 6/16/2020. SCE ensured all vehicles and equipment were washed before arrival onsite and uploaded wash logs to FRED. Furthermore, SCE uploaded monitoring reports documenting compliance with IPMP to FRED.
- **MM BR-10: Prevent Wildlife Entrapment.** The applicant installed covers, ramps, and/or fencing to avoid trapping wildlife in excavation or trenches. Monitoring reports in FRED included documentation of compliance with this measure.
- **MM BR-11: Migratory Bird and Raptor Impact Reduction Measures.** The CPUC approved the Nesting Bird Management Plan (NBMP) on 4/6/2020. CPUC-approved biologists performed preconstruction surveys and monitoring. Additionally, biologists established nest buffers as necessary, and the contractor complied with nest buffer avoidance during construction. SCE documented compliance with the NBMP in FRED.
- **MM BR-12: Burrowing Owl Impact Reduction Measures.** The CPUC-approved avian biologists performed surveys and monitored for active Burrowing Owl sites. A lead biologist established a 300-foot buffer for avoidance if an active nest was discovered. Additionally, the contractor complied with nest buffers during construction. As a result, no project-related impacts on burrowing owls occurred.
- **MM BR-13: Trash Abatement.** All project personnel completed the WEAP training, which included the importance of cleaning up trash and minimizing trash on the Project. The contractor monitored the cleanliness of the Project during construction and post-construction activities. Additionally, SCE uploaded WEAP training logs to the FRED document library.
- **MM BR-14: Protection of Special Status Species on Castle and Cooke Land.** In coordination with the RCA, Castle and Cooke's land had coverage under the MSHCP. Monitoring reports documented compliance with MSHCP requirements in FRED.
- **MM BR-15: Stormwater Pollution Prevention Plan (SWPPP).** Geosyntec prepared two SWPPPs for the Project (one for the yards and one for the linear portion of the Project) and prepared amendments as necessary. In addition, Geosyntec performed inspections and used a QSP designee

from Wilson to assist with inspections as needed. All SWPPPs were located at staging yards and were available for CPUC review upon request.

Cultural Resources

- **MM CR-1a: Ensure Preconstruction Survey Coverage of All Work Areas and Staging Areas.** Paleo Solutions (now Stantec)¹ performed cultural resource assessments as part of the NTPR process. Additionally, they reviewed all new proposed work areas and conducted surveys for the applicant as necessary.
- **MM CR-1b: Avoid Impacts to Known and Undiscovered Historic Resources and Unique Archaeological Resources (Except for site P33-000714).** The CPUC approved the Cultural Resources Monitoring and Treatment Plan on 6/22/2020. The contractor provided Stantec with the construction schedule in order to prepare a monitoring schedule. As a result, Stantec monitored ground disturbance activities and documented compliance with the CRMTP in FRED.
- **MM CR-2: Monitor Ground Disturbing Activities (Includes Native American Monitoring).** Stantec performed archaeological monitoring and uploaded monitoring reports to FRED. Additionally, Stantec coordinated with Native American monitors to have them present during construction activities as necessary and as determined by the Native American tribes. Stantec documented the presence of Native American monitors during construction in FRED. Tribal monitoring was needed at the following Segments VIG1, VIG2, and VIG8.
- **MM CR-3: Monitor Paleontological Sensitive Areas.** The CPUC approved the Paleontological Resources Monitoring Plan (PRMP) on 6/12/2020. Per the PRMP, qualified paleontological monitors conducted full-time construction monitoring in areas with high paleontological sensitivity. Monitoring consisted of the visual inspection of augering activities and spoils piles at the locations of the boreholes, as well as any trench sidewalls and excavated or graded areas for roadways and structures. No significant paleontological resources were identified during construction. Additionally, monitoring reports were submitted to CPUC.
- **MM CR-4: Follow Paleontological Resource Discovery Protocol.** CPUC-approved qualified paleontologists monitored ground-disturbing activities and ensured compliance with the PRMP. All monitoring reports were uploaded to FRED.
- **MM CR-5: Avoid Impacts to Contributing Elements of P33-000714.** P33-000714 is located in VIG1. As such, Stantec established an ESA around the contributing elements and was present for activities as required. All monitoring reports were uploaded to FRED.
- **MM CR-7: Follow Necessary Procedures for Unanticipated Discovery of Human Remains.** According to the CRMTP, if human remains were discovered during construction, all work would be diverted from the discovery area, and SCE would inform the CPUC immediately. In addition, the remains were to be treated following applicable laws concerning human remains, including: CEQA Guidelines section 15064.5(e); PRC sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code section 7050.5. No human remains were discovered during construction.

Hazards

- **MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.** The CPUC approved the Contaminated Soil and Groundwater Contingency Plan on 4/17/2020. Additionally, workers received training relevant to the Contaminated Soil and Groundwater Contingency plan via the WEAP, site-specific safety training, and tailboard meetings throughout construction. WEAP training

¹ Paleo Solutions joined Stantec in 2021.

logs were kept and submitted to the CPUC as necessary. If stained or odorous soil or groundwater was encountered, workers were to stop work and notify the environmental field representatives. Additionally, the Contaminated Soil and Groundwater Contingency Plan was to be followed, including notification, storage, testing of materials, and disposal. Furthermore, per Section 2.6.2 of the Project linear SWPPP, uncontaminated groundwater from dewatering operations can be discharged to upland vegetation or used for dust control without a de minimus permit. The QSD/QSP would need to verify plans before discharging.

- **MM HZ-3: Contacting Affected Landowners Regarding Underground Facilities.** Prior to construction, SCE and/or their contractor prepared a map of underground facilities to determine if septic systems, associated leach fields, and other underground facilities may be impacted by VIG construction. Accordingly, prior to construction at each property, SCE contacted affected private landowners, and documentation of site inspections with landowners was provided and uploaded to FRED. As a result, final engineering plans were designed to avoid damage to public and private underground facilities. If underground facilities may have been damaged or dislocated during the construction of the VIG Project, SCE immediately notified the owner. During VIG construction, the following incident occurred, which resulted in damage to underground facilities:
 - During nightwork activities on December 18, 2021, an existing pavement caved directly adjacent to a bore pit on Segment VIG4 near 3rd street and Pasadena St. in Lake Elsinore, CA. As bore drilling with proper shoring in place had reached, its final depth crews began covering the bore pit with steel plates in anticipation of lowering the boring machine into position the following day. During this process, construction crews noticed water rushing into the pit as the borehole caved in. There were no reported injuries from this incident. SCE immediately contacted the Santa Ana Watershed Project Authority (SAWPA) and waited onsite for the arrival of SAWPA’s emergency response team. As a result, SAWPA’s emergency response team arrived onsite to shut off their pipes and evaluate a clean-up plan. The emergency response team estimated that approximately 300,000 gallons of water overflowed when the line broke prior to the shutoff. In addition, SAWPA’s restoration contractor was onsite to assess necessary repairs. On the following day, SAWPA crews were onsite, and the Brine Line (PVC pipe) break was reported as being approximately 15 feet east of the VIG work. SAWPA crews worked until the pipeline was repaired and back in service.
- **MM HZ-4: Fire Control and Emergency Response Plan.** SCE, in consultation with their contractors, developed a site-specific fire control and emergency response plan to address the risk of fire or other emergencies (e.g., flooding) during construction, operation, and maintenance of the Project. The CPUC approved SCE’s Fire Control and Emergency Response Plan (FCERP) on 6/25/2020. During construction, the CPUC verified implementation of the FCERP. Accordingly, Wilson’s subcontractor, Fire Pro Solutions, provided a full-time Fire Risk Manager to support compliance with the FCERP. Additionally, project personnel received fire hazard training prior to starting construction. WEAP training logs were updated as necessary and uploaded in FRED.

Water Quality

- **MM WQ-1: Blasting Plan and Best Management Practices.** Blasting activities were not required for the VIG Project. Therefore, this mitigation measure was not applicable during construction.
- **MM WQ-2: Drainage Crossing and Procedures and Practices.** In accordance with MM WQ-2, a qualified aquatic monitor assessed drainages after rain events and prior to construction-related drainage crossings to determine a need for temporary or permanent bridges. The following drainage locations were inspected:
 - Between 097 and 098

- Between 106 and 107
- Southeast of 116
- Between 126 and 127
- East of 424
- Between 522 and 523
- Road leading to 532 and 533

Monitoring reports were uploaded in FRED.

- **MM WQ-3: Design of Access Roads with Erosion Control Measures.** Power Engineers designed roads in accordance with MM WQ-3. All road designs were approved by SCE and built to minimize adverse erosion and siltation impacts. Additionally, as described in Section 2.2, all necessary permits and approvals were obtained from USACE, Santa Ana RWQCB, and CDFW.
- **MM WQ-4. Disposal of Groundwater from Dewatering Excavations.** Disposal of groundwater as a result of dewatering was performed in accordance with the Project linear SWPPP. Correspondingly, uncontaminated groundwater from dewatering operations was discharged to upland vegetation (see Figure 11) or used for dust control without a de minimus permit (see Figure 13). Dewatering plans were verified with the Project QSD/QSP before proceeding with discharge.
- **MM WQ-5: Maintain Capacity and Connectivity of Drainages.** In addition to the VIG Project access roads being constructed with erosion control measures, they were designed by Power Engineers and built by Wilson to maintain the capacity and connection of drainages adjacent to and crossed by the access roads. Power Engineers designed roads in accordance with MM WQ-3. All road designs were approved by SCE and built to minimize adverse erosion and siltation impacts.
- **MM WQ-6. Avoid Impeding MDP Implementation and Function.** SCE consulted with the Riverside County Flood Control District and Water Conservation District to ensure that project elements within the Master Drainage Plan areas would not impede the function of flood control facilities and would not prevent implementation of the MPD. SCE submitted a letter to the CPUC confirming coordination.

Noise

- **MM NV-1: Construction Noise Reduction Measures.** Prior to the start of construction, SCE prepared and submitted a Noise Control Plan that the CPUC approved on 5/19/2020. Additionally, Project personnel received training regarding compliance with the Noise Control Plan in the WEAP and training logs were submitted to the CPUC. Correspondingly, all sensitive receptors (e.g., residences) within 300 feet of construction activities were notified in advance prior to construction. Copies of the mailing list and notifications were submitted to the CPUC. During construction, Wilson monitored for the following at locations within 300 feet of residents:
 - Minimizing vehicle use and idling
 - Staging equipment away from receptors, when possible
 - Minimize use of backup cameras,
 - Shielding small stationary equipment with portable barriers withing 100 feet of receptors

Daily monitoring reports were prepared for locations identified in the Noise Control Plan. The report included hourly length Leq(h) for all hours of active construction and highlighted exceedances. These reports were submitted to the CPUC within 15-days of the monitoring period ending.

- **MM NV-2: Blasting Vibration Control Measures.** Blasting activities were not required for the VIG Project. Therefore, this mitigation measure was not applicable during construction.

Traffic

- **MM TT-1: Traffic Management and Control Plan.** As part of the encroachment permit procurement process, SCE submitted a Traffic Management and Control Plan that the CPUC approved on 6/16/2020. Additionally, prior to the start of construction, project personnel received training on transportation and traffic measures in the WEAP training. WEAP training logs were updated as necessary and submitted to the CPUC for verification.
- **MM TT-2: Heavy Vehicle Traffic Restrictions.** In order to minimize heavy vehicle traffic for the VIG Project at the Lake Street and I-15 northbound ramp during morning peak hours (7:00 AM to 9:00 AM), SCE alerted and ensured truck drivers associated with the Project used the Indian Truck Trail and I-15 northbound ramp when traveling to project sites. Similarly, SCE and the Wilson construction management team ensured minimizing construction traffic for the Project at the Menifee Road and SR-74 intersection during afternoon peak hours (4:00 PM to 6:00 PM). In addition, all project personnel received training on transportation and traffic measures in the WEAP training, and WEAP logs were updated and submitted to the CPUC as necessary for verification.
- **MM TT-3: Highway Closure Plan.** Highway closures were not necessary to complete the VIG Project construction on I-15 or SR-74. Therefore, a highway closure plan was not applicable during construction. However, at least 15 days before initiating installations of the crossings, SCE provided to the CPUC evidence of Caltrans granting the necessary encroachment permits.
- **MM TT-4: Helicopter Lift plan.** SCE's air operations team coordinated with the FAA to obtain FAA-required approvals, including but not limited to a Helicopter Lift Plan for operations within 500 feet of congested areas or residences. As a result, the SCE air operations team received FAA approval of the plan prior to helicopter operations and submitted approval documentation to the CPUC on 10/13/2020.
- **MM TT-5: FAA No-Hazard Determination.** Per Code of Federal Regulations, Title 14: Aeronautics and Space, Part 77: Safe, Efficient Use, and Preservation of the Navigable Airspace (CFR 77.9 construction or alterations requiring notice), if the structures and/or spans are lower than 200 feet AGL (highest point) and not in proximity to an airport (within 20,000 feet), FAA filing is not required. Therefore, SCE analyzed Segments VIG1 to VIG8 to determine which structures required FAA filing. After the evaluation, SCE determined that 73 structures in VIG1 and Terra Cotta Line in VIG required FAA filing. As a result, SCE submitted FAA filings for the required structures and moved forward with constructing structures that did not require filing. On 11/13/2020, all 73 structures received a No-Hazard Determination. SCE's analysis of Segments VIG1 to VIG8, maps, and FAA No-Hazard Determination were submitted to the CPUC in accordance with MM TT-5.
- **MM TT-6: Road Damage Repair.** SCE documented roadway conditions prior to construction with photographs along roads identified for heavy vehicle use in the Project's Traffic Impact Analysis. Additionally, SCE photographed the areas after completion of the VIG Project and after any repairs to document the restoration of pre-project pavement conditions. SCE submitted post-construction and restoration photographs to the CPUC for verification.

- **MM TT-7: Emergency Service Provider Notification.** SCE notified local emergency providers (i.e., police departments, ambulance services, and fire departments) of road closures at least one week before the closure. Copies of coordination between SCE and the local emergency service providers in the FERP were submitted to the CPUC. The notifications included the closure's location, date, time, and duration. Additionally, SCE provided further notifications as necessary and in accordance with encroachment permits.

3.3.2 Non-compliance Reports

A non-compliance is defined as “any construction activity that deviates from permit conditions, NTPs, PCs, or mitigation measures, particularly when the activity puts a sensitive resource at risk” according to MMCRP Chapter 3.4. The Non-compliance Levels are detailed in the MMCRP and consist of the following levels: Minor Compliance Incident, Non-compliance Level 1, Non-compliance Level 2, and Non-compliance Level 3. Non-compliance issues were either self-reported by the applicant or by the CPUC Compliance Monitor. Thus, the CPUC Compliance Monitor performed a total of 35 site visits during construction and observations including minor compliance incidents were reported in the Monitoring Reports prepared and issued by WSP. Additionally, as described in Section 3.2 Construction, SCE provided monitors to ensure that construction activities were conducted in accordance with the required mitigation measures, PCs, 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 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.

A summary of incidents by level and type as monitored by SCE and their contractors are summarized in Table 5. All incidents and observations recorded during Project construction are documented in SCE’s FRED. A total of 295 incidents were entered in FRED during construction.

Table 5. VIG: Summary of Incidents

Incident Level	Type	Total
Observation	Aesthetics (Non-project related)	2
Observation	Biological (Non-project related)	244
Observation	Biological	8
Observation	AQ/SWPPP/Hazardous Materials	18
Observation	Traffic and Transportation	1
Level 1	Cultural	1
Level 1	Cultural	1
Level 1	Biological	1
Level 1	Biological	1
Level 2	Biological	2
Total		278

Source: SCE FRED, 2022.

Key:

AQ = Air Quality

SWPPP = Stormwater Pollution Prevention plan

As aforementioned, the CPUC environmental compliance team also monitored the VIG Project construction activities to ensure that they were conducted according to the required mitigation measures, PCs, permit conditions, and compliance plan requirements. A non-compliance incident may be discovered by the CPUC compliance monitoring team (offsite) or by the CPUC Compliance Monitor (on-site) during a site visit. If non-compliance was identified, the issue was brought to the attention of SCE and/or their contractor's Environmental Field Lead. Additionally, non-compliance was documented in the Monitoring Reports prepared by WSP if it was promptly addressed. On the other hand, if the non-compliance was not adequately addressed or self-reported, a CPUC Incident, Project Memorandum, and/or a Non-Compliance Report was issued based on the severity of the violation and in accordance with the MCCRCP section 3.4.1 Non-Compliance Incident Level and SCE's non-compliance levels. A summary of incidents by level and type as monitored by the CPUC compliance monitoring team are summarized in Table 6.

Table 6. CPUC Compliance Monitor Non-Compliance Reporting

Date	VIG Project/ Regulatory Requirement	Location	Description	Follow-up/ Corrective Actions
Observations				
10/22/2020	SWPPP	Near TSP 302	Small drip pans were placed underneath large construction equipment (e.g., large drilling rig) and used as secondary containment. No leaks or spills were observed.	SCE and/or their contractor were notified.
11/4/2020	Biological Resources	Near TSP 302	The excavation next to TSP 302 was covered, but several openings were visible.	Visible openings were properly covered.

Table 6. CPUC Compliance Monitor Non-Compliance Reporting				
Date	VIG Project/ Regulatory Requirement	Location	Description	Follow-up/ Corrective Actions
11/4/2020	SWPPP	Near TSP 103	Small drip pans were placed underneath large construction equipment and used as secondary containment. No leaks or spills were observed. Larger drip pans and additional dust control were recommended.	SCE and/or their contractor were notified. Additional dust suppression was conducted.
12/1/2020	SWPPP	Near TSPs 408 and 409	Fugitive dust resulting from the use of large construction equipment on dirt roads.	SCE and/or their contractor were notified. Dust suppression was conducted.
12/16/2020	SWPPP	Near Ivyglen Substation	Inadequate-sized secondary containment was placed underneath parked equipment. No leaks or spills were observed.	SCE and/or their contractor were notified. Additional dust suppression was conducted.
1/6/2021	SWPPP	Along transmission corridor	A very dusty access road was observed along the transmission corridor.	SCE and/or their contractor were notified. Additional dust suppression was conducted as necessary.
2/18/2021	N/A	Near TSP 520	Non-project related crews cleared vegetation and removed soil from Temescal Creek across from TSP 520.	N/A
8/12/2021	SWPPP	Near TSP 370	A non-operational water pump and gas tank was placed on the roadway without secondary containment. No leaks or spills were observed.	Proper secondary containment was placed.
8/18/2021	SWPPP	Along Lake Street	A jurisdictional drainage along Lake Street needs BMP upgrades.	BMP upgrades were implemented and observed on 9/3/2021.
9/3/2021	SWPPP	Near TSP 145	The access roads to TSP 145 had minor erosion. A recommendation to address the erosion before the next rainy season was provided.	Erosion concerns were addressed prior to the upcoming rainy season.

Table 6. CPUC Compliance Monitor Non-Compliance Reporting				
Date	VIG Project/ Regulatory Requirement	Location	Description	Follow-up/ Corrective Actions
11/4/2021	SWPPP	Near Horsethief Canyon	A very small drip pan was placed under large construction equipment (e.g., belly loader). No leaks or spills were observed.	SCE and/or their contractor were notified. Larger drip pans or alternative adequate-sized secondary containment was installed.
Incidents				
Level 1				
<i>None</i>				
Level 2				
<i>None</i>				
Level 3				
<i>None</i>				
Project Memorandum				
<i>None</i>				
Non-Compliance Reports				
<i>None</i>				

3.3.3 Safety Incidents

SCE was required to report on health and safety incidents in accordance with the CPUC’s Safety Citation Program and Accident Reporting Requirements. Additionally, unanticipated events that had the potential to impact project personnel and/or public safety required reporting to the CPUC. While these events may not result in a deviation from or violation of a mitigation measure or permit condition, it was critical to inform the appropriate agencies and the CPUC so they could address any questions or concerns from the public or management. Therefore, the SCE EPM was required to promptly report these incidents to WSP, CPUC Project Managers, and applicable regulatory agencies and provide electronic notifications detailing the event, actions, and outcomes. No safety incidents were reported for the VIG Project.

3.3.4 Public/Stakeholder Complaints

Per the MMRP, SCE was required to provide weekly summaries of public complaints, including how each complaint was addressed. Thus, SCE assigned a Local Public Affairs Manager responsible for tracking and handling public complaints. Public complaints could also be formally submitted to SCE and CPUC through email or the Project Information Line. If a complaint was received, the CPUC Compliance Manager or Project Manager coordinated with SCE’s Environmental Project Manager, who worked with SCE’s Local Public Affairs Manager to determine the adequacy of corrective actions or additional measures to be implemented, as necessary.

Throughout construction, stakeholders or members of the public complained about the project or specific aspects of construction activities. The applicant followed up with and resolved all complaints. A list of the complaints and resolutions is provided in Table 7.

Landowner(s)/ Entity	Initial Concern	Proposed Action	Action Taken	Status
Chen	Notification	Provide proof of notification	SCE provided proof of Project notification sent on 10/20/2020.	Closed
Temescal Valley Municipal Advisory Council	Traffic increase	Install message boards and make traffic control locations smaller where possible	SCE representatives reached out to the concerned residents and notified them of upcoming construction activities, lane closures, and duration. Additionally, new signage was installed to alert the communities about upcoming activities and lane closures.	Closed
Developer	Eco Industrial Park development interference	Evaluate potential alignment shift	SCE and landowner agreement. Plants were surveyed. Alignment was installed on the southern side of Baker Street.	Closed
Healing Tree	Traffic – entrance interference	Install additional signage	Additional signage was installed. Access to parking lot remained open for customers.	Closed

3.3.5 Final Inspection

In support of a final inspection for the VIG Project, the CPUC compliance team verified via photographic documentation that construction was cleared from the right-of-way except for that which was still in use for restoration activities. A series of photographs taken after road repairs to document the restoration of pre-project pavement conditions are included in Attachment A.

3.4 Post-Construction Compliance

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

Aesthetics

- **MM AES-4 Lake Street Pole Replacement and Landscaping.** The purpose of MM AE-4 is to require that poles along Lake Street be set back from the roadway and that landscaping be placed between the poles and roadway to lessen the dominance of the poles in the viewshed. The VIG Lake Street plant installation was initiated on November 30, 2021, and completed on January 6, 2022. A total of 724 plants and 9 trees were planted at Poles 47655452E to 47655481E. All plants and trees

were installed in compliance with the VIG Landscaping Plan approved by the City of Lake Elsinore on August 16, 2021. After installation, plants were maintained throughout a 120-day establishment/warranty period per the plan. Beginning on January 10, 2022, crews filled water bags weekly, except for weeks with rain accumulation of 0.1 inches or greater. Crews and a water truck supported watering activities. Furthermore, trash, debris, or litter was removed within the planting areas. Weed abatement commenced in February 2022. The crews hand-pulled and applied herbicide to prevent the weeds from out-competing the installed plants.

Biweekly inspections were performed to check plant health, report non-project damage, and make maintenance adjustments. Inspectors noted that some plants were stolen or crushed by non-project vehicles. In response to non-project vehicle crushing, snow fencing was installed at sites where vehicles could pull off the road and damage the plants. On March 11, 2022, a full inventory was conducted, documenting the failure of plants for replacement. A total of 38 plants (5%) were replaced on March 24 and April 7, 2022. A final plant inventory before the end of the warranty period was conducted on April 29, 2022, of which 58 plants (8%) were replaced on May 12 and 13, 2022. In addition, 9 plants were planted at locations with empty basins on September 15 and 16, 2022. As of October 2022, the plants are in healthy condition and becoming well-established. No further non-project impacts to the plants were noted as the snow fencing continued to protect the plants. Crews continue to remove weeds from the planting basins regularly and replace mulch as necessary to maintain proper mulch depth. Watering will continue weekly through December 2022, then biweekly in 2023, per the plan. A series of VIG landscaping site photographs are included in Attachment A.

Biological Resources

- **MM BR-7 Habitat Restoration and Revegetation Plan.** The purpose of the HRMP is to restore and revegetate temporarily impacted and disturbed areas to pre-construction conditions or better and provide for habitat restoration resulting from permanent impacts to sensitive vegetation communities. Additionally, per the CDFW 1602 SAA Compensatory and Reporting Measures, Section 3.1 Habitat Restoration, “upon completion of construction activities, Permittee shall restore temporary work areas and access routes, including the 1.26 acres of streambed and associated habitats to pre-project conditions or better.” Consequently, jurisdictional impacts in sensitive habitats resulted from the installation of poles, construction of drainage control features such as gabion baskets, tree trimming, construction and/or improvements to access roads, establishment of cable-pulling and wire stringing setup sites, and establishment of staging areas. A total of 0.18 acres of permanent impacts and 0.30 acres of temporary impacts to CDFW streambeds and associated riparian habitat were documented during the construction of the Project.

SCE initiated the restoration activities for the VIG Project in December 2021 and completed the installation in January 2022. Most sensitive habitats, including jurisdictional sites, were hydroseeded using approved native seed mixes and a two-stage application method, and native mulefat cuttings were used for riparian restoration following the specifications in the HRRP. The restoration sites were watered weekly using a water truck and hand-weeded during the maintenance period from March 2022 to June 2022.

Performance monitoring will continue for up to three years to evaluate the progress of the restoration site toward achieving success criteria and recommended remedial activities. The monitoring activities were performed by qualified biologists that demonstrated habitat restoration experience in the on-site vegetation communities. Qualitative monitoring surveys were conducted monthly in all restored/revegetated areas for the first year following planting. Afterward, the quality monitoring

schedule will shift quarterly until completion and approval by the appropriate regulatory agencies. The qualitative surveys that were performed assessed native plant species' performance, including growth and survival, germination success, reproduction, and plant fitness, as well as documented concerns and recommendations.

Additionally, SCE will conduct performance monitoring annually during the growing season each year of the 3-year monitoring period. The first year of restoration monitoring is anticipated to be completed in February 2023. The first annual restoration report summarizing the revegetation efforts and progress towards achieving the success criteria will be submitted to CDFW in March 2023 and the CPUC for verification and concurrence.

To date, the VIG Project is on target for meeting the success criteria defined in the HRRP. Overall, the restoration sites are in good condition and will continue to be re-evaluated during monthly and quarterly qualitative assessments. The native shrubs impacted during construction are recovering well, and many native shrub seedlings from the hydroseeding have been observed. Additionally, one of the riparian restoration sites restored with mulefat cuttings shows signs of success with a cutting survival of 90 percent. Pre- and post-construction photographs of the impacted jurisdictional sites are provided in Attachment A.




Transportation

- **MM TT-6 Road Damage Repair.** The purpose of MM TT-6 is to restore and repair roads to pre-project conditions. Pre-project photos were uploaded to FRED. Post-construction photographs were taken to document the restoration of pre-project pavement conditions. All photographs documenting restoration were submitted to the CPUC. A series of road pavement and restoration site photographs are included in Attachment A.

APPENDIX

A Post-construction Restoration

MM AES-4. Lake Street Pole Replacement and Landscaping

Description	Photo
<p>Plant installation at Pole 4765470. Photo taken on December 7, 2021, facing south.</p>	
<p>Plant installation at Pole 4765467E. Photo taken on December 8, 2021, facing south.</p>	
<p>Recently filled water bags at Pole 4765467E. Photo taken on February 21, 2022, facing northeast.</p>	

Plants establishing well at Pole 4765479E.
Photo taken on May 16, 2022, facing north.



Watering plants at Pole 4765466E.
Photo taken on June 17, 2022, facing south.



Palo verde trees establishing well at Pole 4765452E.
Photo taken on July 11, 2022, facing east.



Plants establishing well at Pole 4765461E.
 Photo taken on September 1, 2022, facing northwest.



Plants have established and are starting to screen the base of the pole at Pole 4765479E.
 Photo taken on October 28, 2022, facing north.



MM BR-7 Habitat Restoration and Revegetation

Description

Photo

Feature ID: San Jacinto River. View of work area and low alluvial terrace (non-native grassland) habitat at Pole 4765120E pre-construction.
 Photo taken on July 8, 2020, facing east.



Feature ID: San Jacinto River (C). View of work area at Pole 4765120E post post-construction. Photo taken on January 5, 2022, facing west.



Feature ID: San Jacinto River. View of work area and low alluvial terrace (non-native grassland) habitat at Pole 4765121E pre-construction. Photo taken on July 8, 2020, facing northwest.



Feature ID: San Jacinto River. View of work area that was hydroseeded at Pole 4765121E post-construction. Photo taken on January 5, 2022, facing northwest.



Feature ID: 20. View of work area and ephemeral streambed between Poles 4765126E and 4765127E pre-construction.

Photo taken on October 6, 2020, facing north.



Feature ID: 20. View of gabion basket between Poles 4765126E and 4765127E post-construction.

Photo taken on April 4, 2022, facing northwest.



Feature ID: 23. View of work area between Poles 4765145E and 4765146E pre-construction.

Photo taken on October 12, 2020, facing northeast.



Feature ID: 23. View of rip rap between Poles 4765145E and 4765146E post-construction. Photo taken on April 4, 2022, facing northeast.



Feature ID: 41. View of work area and southern arroyo willow riparian forest prior to tree trimming. Photo taken on July 29, 2021, facing northwest.



Feature ID: 41. View of southern arroyo willow riparian forest after tree trimming. Photo taken on April 15, 2022, facing northwest.



Feature ID: 50. View of work area and ephemeral drainage at Pole 4765413E pre-construction.
Photo taken on December 3, 2021, facing northeast.



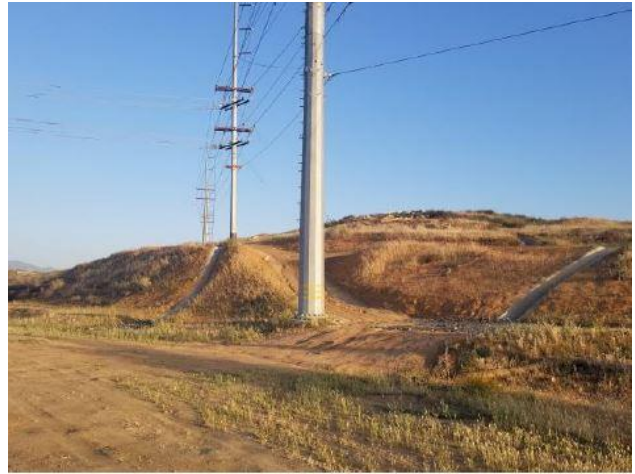
Feature ID: 50. View of ephemeral drainage at Pole 4765413E post-construction.
Photo taken on April 15, 2022, facing northeast.



Feature ID: 50. View of work area and ephemeral drainage at Pole 4765421E pre-construction.
Photo taken on April 21, 2020, facing northwest.



Feature ID: 50. View of work area and ephemeral drainage at Pole 4765421E post-construction.
Photo taken on April 15, 2022, facing northwest.



Feature ID: 59. View of work area and ephemeral streambed at Poles 4765481E and 015E (4962161E) pre-construction.
Photo taken May 5, 2021, facing north.



Feature ID: 59. View of access road at Poles 4765481E and 015E (4962161E) post-construction.
Photo taken on April 15, 2022, facing north.



Feature ID: Temescal Wash. View of work area and ephemeral drainage after a recent rain event at Pole 476520E pre-construction.

Photo taken February 5, 2021, facing north.



Feature ID: Temescal Wash. View of work area and ephemeral drainage at Pole 476520E post-construction.

Photo taken on April 15, 2022, facing north.



Feature ID: 71. View of work area and ephemeral streambed within access road to Poles 4765528E and 4765529E pre-construction.

Photo taken February 10, 2021, facing north.



Feature ID: 71. View of gabion basket within access road to Poles 4765528E and 4765529E post-construction.

Photo taken on April 7, 2022, facing north



Feature ID: 76. View of work area and tamarisk scrub riparian habitat adjacent to the access road to Poles 4765532E and 4765533E pre-construction.

Photo taken on June 7, 2018, facing west.



Feature ID: 76. View of gabion basket and newly planted mulefat cuttings adjacent to the access road to Poles 4765532E and 4765533E post-construction.

Photo taken on April 15, 2022, facing southwest.



Feature ID: 84. View of work area and ephemeral streambed at Pole 4765574E pre-construction. Photo taken on January 4, 2021, facing west.



Feature ID: 84. View of work area and ephemeral streambed at Pole 4765574E post-construction. Photo taken on April 15, 2022, facing southwest.



Feature ID: 111. View of work area, and ephemeral streambed and riparian vegetation at Pole 4765580E pre-construction. Photo taken on December 7, 2020, facing north.



Feature ID: 111. View of work area, and ephemeral streambed and riparian vegetation at Pole 4765580E post-construction.
 Photo taken on April 6, 2022, facing northeast.



MM TT-6 Road Damage Repair

Description

Photo

Hostettler Rd.
 Photo taken on February 23, 2022, facing south.



Hostettler Rd.
 Photo taken on February 23, 2022, facing west.



Intersection at Hostettler Rd. and Temescal Canyon Rd.

Photo taken on February 23, 2022, facing west.



Temescal Canyon Rd.

Photo taken on February 23, 2022, facing west.



Temescal Canyon Rd.

Photo taken on February 23, 2022, facing west.



Temescal Canyon Rd.
Photo taken on February 23, 2022, facing northwest.



Concordia Ranch Rd.
Photo taken on February 23, 2022, facing southwest.



Concordia Ranch Rd.
Photo taken on February 23, 2022, facing northwest.



Concordia Ranch Rd.
Photo taken on February 23, 2022, facing northwest.



Concordia Ranch Rd.
Photo taken on February 23, 2022, facing northwest.



Lake St.
Photo taken on February 23, 2022, facing south.



Concordia Ranch Rd.
Photo taken on February 23, 2022, facing north.



Intersection at Lake St. and Temescal Canyon Rd.
Photo taken on February 23, 2022, facing south.



Intersection at Lake St. and Temescal Canyon Rd.
Photo taken on February 23, 2022, facing north.



Lake St.
Photo taken on February 23, 2022, facing south.



Lake St.
Photo taken on February 23, 2022, facing north.



Intersection at Lake St. and Nichols Rd.
Photo taken on February 23, 2022, facing south.



Access road along Nichols Rd.
Photo taken on February 23, 2022, facing north.



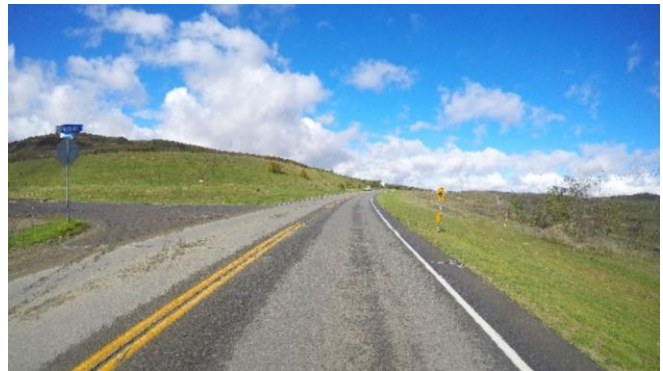
Nichols Rd.
Photo taken on February 23, 2022, facing northwest.



Intersection at Nichols Rd. and Alberhill Ranch Rd.
Photo taken on February 23, 2022, facing northwest.



Intersection at Nichols Rd. and Terra Cotta Rd.
Photo taken on February 23, 2022, facing northwest.



Nichols Rd.
Photo taken on February 23, 2022, facing northwest.



Intersection at Baker Street and Nichols Rd.
Photo taken on February 23, 2022, facing northwest.



Baker Street.
Photo taken on February 23, 2022, facing northwest.



Baker Street.
Photo taken on February 23, 2022, facing northwest.



Baker Street.
Photo taken on February 23, 2022, facing northeast.



Intersection at Baker Street and Turnbull Ave.
Photo taken on February 23, 2022, facing northwest.



Baker Street.
Photo taken on February 23, 2022, facing northwest.



Riverside Dr.
Photo taken on February 23, 2022, facing southwest.



Riverside Dr.
Photo taken on February 23, 2022, facing southwest.



Intersection at Collier Ave. and Riverside Dr.
Photo taken on February 23, 2022, facing northwest.



Collier Ave.
Photo taken on February 23, 2022, facing northwest.



Collier Ave.
Photo taken on February 23, 2022, facing northwest.



Central Ave.
Photo taken on February 23, 2022, facing northeast.



Central Ave.
Photo taken on February 23, 2022, facing northeast.



Pasadena St.
Photo taken on February 23, 2022, facing southeast.



Intersection at Pasadena St. and Crane St.
Photo taken on February 23, 2022, facing southeast.



Pasadena St.
Photo taken on February 23, 2022, facing southeast.



3rd St.
Photo taken on February 23, 2022, facing southwest.



3rd St.

Photo taken on February 23, 2022, facing southwest.



W. Minthorn St.

Photo taken on February 23, 2022, facing southeast.



W. Minthorn St.

Photo taken on February 23, 2022, facing southeast.

