November 7, 2020

Patricia Kelly CPUC Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

### Re: Monthly Report Summary #3 for the Valley-Ivyglen 115-kV Substation (VIG) Project

Dear Ms. Kelly

This report summarizes the compliance monitoring activities that occurred during the period from September 1 to 30, 2020, for the Valley-Ivyglen 115-kilovolt (kV) Substation (VIG) Project in Riverside County, California. Compliance monitoring was performed to ensure that all project-related activities conducted by Southern California Edison (SCE) and their contractors comply with the requirements of the Final Environmental Impact Report for the VIG Project, as adopted by the California Public Utilities Commission (CPUC) on August 31, 2018.

The CPUC has issued the following Notices to Proceed (NTPs) for the VIG Project to SCE:

- NTP #1 (July 1, 2020) Construction on select activities for the VIG Project throughout Segments VIG1, VIG2, and VIG3. Construction activities include the following: 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. NTP-1 excludes work at sites requiring jurisdictional water permits.
- NTP #2 (September 8, 2020) Construction on select activities for the VIG Project throughout segments VIG4, VIG5, VIG6, VIG7, and VIG8. Construction activities include the following: 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 subtransmission line to new 115-kV structures or underground positions, and installation of new 115-kV switching and protective equipment at Ivyglen Substation. NTP-2 excludes work at sites requiring jurisdictional water permits.

Onsite compliance monitoring by the WSP USA Inc. (WSP), formerly Ecology and Environment, Inc., compliance team during this reporting period focused on spot-checks of ongoing construction activities. The CPUC Compliance Monitor visited the VIG construction sites on September 17 and 30, 2020. Site inspection reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and project commitments (PCs) were completed for the site visits. These reports are attached below (Attachment 1).

The CPUC did not issue a Non-compliance during the period from September 1 to 30, 2020. Communication between the CPUC/WSP compliance team and SCE has been regular and effective; the correspondence pertained to and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between the CPUC/WSP and SCE, along with daily schedule updates and automated database notifications from SCE, supplied additional compliance information and construction summaries. Furthermore, SCE's monthly compliance status

report for September 2020 supplied a compliance summary and included a description of construction activities from September 1 to 30, 2020, a detailed review of the construction schedule, a summary of compliance with VIG Project commitments (i.e., the MMs/PCs) for biological resources, cultural and paleontological resources, the Storm Water Pollution Prevention Plan (SWPPP), noise, and the Worker Environmental Awareness Program (WEAP), non-compliance issues and resolutions, and public complaints and notifications.

### **Compliance Incidents**

No compliance incidents were reported during September 2020.

#### **Public Concerns**

There were no public concerns during September 2020.

## **Project Approvals**

During September 2020, NTPR-2 was approved by the CPUC. Additionally, one Minor Project Refinement (MPR) was submitted by SCE during September 2020. Table 1 summarizes the VIG Project NTPR and MPR submittals and status for September 2020.

Table 1: Approvals for September 2020.

Submittal	Description	Status
NTPR-1	SCE is seeking a Notice to Proceed Request authorization for construction on select activities for the VIG Project throughout Segments VIG1, VIG2, and VIG3. Construction activities include the following: 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. NTPR-1 excludes work at sites requiring jurisdictional water permits.	Approved. NTP – 1 issued on July 1, 2020.
NTPR-2	SCE is seeking a Notice to Proceed Request authorization for construction on select activities for the VIG Project throughout Segments VIG4, VIG5, VIG6, VIG7, and VIG8. Construction activities include the following: 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 subtransmission line to new 115-kV structures or underground positions, and installation of new 115-kV switching and protective equipment at Ivyglen Substation. NTPR-2 excludes work at sites requiring jurisdictional water permits.	Approved. NTP-2 issued on September 8, 2020.
MPR No. 1	Eleven staging areas were approved for use as part of the Project. None of the 11 approved project staging areas (80.4 acres) listed in FEIR Table 2-9 are suitable as a staging area for the westerly portion of the Project. Due to the elimination of options of staging areas analyzed in the FEIR (73.4 acres are not available for use), SCE proposes to add an approximately 5.9-acre (approximately 257,004 square feet) staging area located at 14570 Concordia Ranch Road, Lake Elsinore, CA 92530 (Concordia Yard) to service the western portions of the Project.	Approved 8/11/2020
MPR No. 2	SCE proposes to expand the general disturbance area so that the work described in Section 2.3.1.1 of the FEIR can be performed within work areas of the size identified in Table 2-5 of the FEIR as being necessary to construct the project components. Furthermore, NTPR-1 proposed access	Approved 8/14/2020

	roads to 129E and 131E that would provide long-term accessibility needed by SCE for maintenance of the structures. However, the proposed routes traverse rough terrain that is unpassable until the roads are constructed. SCE proposes additional access roads at 129E (Figure 2) and 131E (Figure 3) that would allow construction crews to access the site prior to the completion of the engineered access roads in order to facilitate structure installation. Proposed access roads fall within the general disturbance area.	
MPR No. 4	SCE proposes 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.	Under CPUC review

Sincerely,

Chuck Cleeves Project Manager, WSP cc: Fernando Guzman, WSP Michael Bass, SCE Marcus Obregon, SCE

# **ATTACHMENT 1**

CPUC Site Inspection Reports September 17 and 30, 2020



# Valley – Ivyglen Subtransmission Project CPUC Site Inspection Form

Project:	Valley – Ivyglen Project	Date:	September 17, 2020
Project Proponent:	SCE	Report #:	VS006
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vincent Semonsen
CPUC PM:	Patricia Kelly, Energy Division	AM/PM Weather:	Hazy sunshine, very warm, slight breeze
CPUC CM (E & E):	Chuck Cleeves	Start/End time:	1400 hrs – 1600 hrs
Project NTP(s):	NTP-1.		

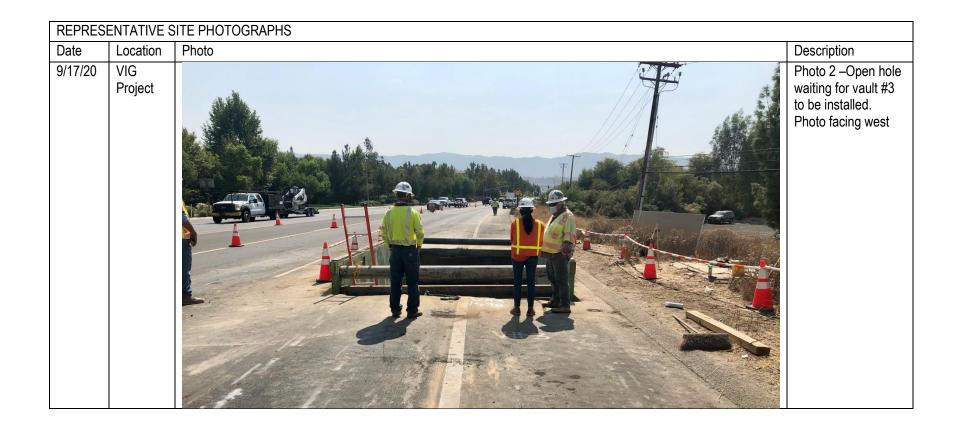
## SITE INSPECTION CHECKLIST

WEATP Training	Yes	No	N/A
Has WEAP training been completed by all new hires (construction and monitors)?	Χ		
Erosion and Dust Control (Air and Water Quality)		•	
Have temporary erosion and sediment control measures been installed?	Χ		
Are erosion and sediment control measures properly installed and functioning?	Х		
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?	Х		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Is excessive fugitive dust leaving the work area?		Χ	
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	Х		
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?	Х		
Are vehicles/equipment turned off when not in use?	Х		
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Х		
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		

Are all excavations and trenches covered at the end of the day?	Χ		
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	X		
Biology			
Have preconstruction surveys been completed for biological (coastal California gnatcatcher, least Bell's vireo, southwestern will flycatcher, rare plants) resources as appropriate?	Х		
Are biological monitors present onsite?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Have wildlife been relocated from work areas?		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		Х	
Were any threatened or endangered species observed? If yes, list observations below:		Х	
Are there wetlands or water bodies present near construction activities?		Х	
Have there been any work stoppages for biological resources?		Х	
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			Х
Are archaeological and paleontological monitors onsite if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources?		Х	
Hazardous Materials			
Are hazardous materials stored appropriately?	X		
Are procedures in place to prevent spills and accidental releases?	Х		
Are appropriate fire prevention and control measures in place?	Х		
Is contaminated soil properly handled or disposed of, if applicable?	Х		
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?			Х
Is construction occurring within approved hours?	Х		
Are noise control measures in place within 100 feet of sensitive receptors as needed?			Х

AREAS MONITORED (i.e., structure numbers, yards, or substations)
Segments 1, 2 and 8
DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)
I was onsite at 2 in the afternoon and met with the Environmental Project Manager (EPM) at the intersection of Conrad and Hwy 74. A paving crew put down asphalt over the conduit trench (Photo 1). A traffic control crew had one lane of Hwy 74 cordoned off while the teams are working.
We drove east on Hwy 74 to where a crew was installing vault #3 (Photo 2). One of the environmental inspectors was on site, and the vault was sitting on nearby trucks. The hole for the vault had been dug and shored up (Photo 3), but crews were on hold waiting for the crane's arrival. The crew must install the vault and plate it before they can leave for the day. According to the SCE inspector, they only have a couple more weeks of underground work for this project segment.
Another short distance to the east, the pole installation crew was finishing up for the day (Photo 4). The foreman looked at the following pole locations and discussed the possibility of relocating them with the EPM. They were both located on steep, rocky slopes (Photo 5). According to the EPM, they can move the pole location short distances; otherwise, they would have to check in with the engineers. A paleontological and cultural monitor was overseeing the work at this location. According to these monitors, there was documentation of some sort of grinding site nearby, but they could not find it.
Our last stop was at the new laydown yard along Hwy 15, close to the lvyglen substation. This location will be the main laydown yard; it's 6 acres in size and bordered on the south by a dry creek corridor (Photo 6). The area was recently established, with the fencing, addition of gravel, and installation of best management (BMPs) practices still to be completed. However, according to the EPM, this work will be completed soon, with extra BMPs installed along the southern boundary above the creek corridor.
MITIGATION MEASURES VERIFIED (Refer to MMCRP Report only on MMs pertinent to your observations today)
All of the project personnel appeared to be WEAP trained.
RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)
COMPLIANCE SUMMARY Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.
New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc.
Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.
New non-compliance issues reported by SCE monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include SCE report identification number.
PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:













Completed by:	Compliance Monitor
Firm:	Ecotech Resources, Inc.
Date:	9/22/20

Reviewed by:	Manager
Firm:	Ecotech Resources, Inc.
Date:	09/23/20



# Valley – Ivyglen Subtransmission Project CPUC Site Inspection Form

Project:	Valley – Ivyglen Project	Date:	September 30, 2020
Project Proponent:	SCE	Report #:	VS007
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vincent Semonsen
CPUC PM:	Patricia Kelly, Energy Division	AM/PM Weather:	Hazy sunshine, cool in the AM but warming quickly, winds are calm
CPUC CM (E & E):	Chuck Cleeves	Start/End time:	0600 hrs – 0930 hrs
Project NTP(s):	NTP-1.		

## SITE INSPECTION CHECKLIST

WEATP Training	Yes	No	N/A
Has WEAP training been completed by all new hires (construction and monitors)?	Χ		
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	Χ		
Are erosion and sediment control measures properly installed and functioning?	Χ		
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?	Χ		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Χ		
Is excessive fugitive dust leaving the work area?		Χ	
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	Χ		
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?	Χ		
Are vehicles/equipment turned off when not in use?	Χ		
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Χ		
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	X		

Are all excavations and trenches covered at the end of the day?	Χ		
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	X		
Biology			
Have preconstruction surveys been completed for biological (coastal California gnatcatcher, least Bell's vireo, southwestern will flycatcher, rare plants) resources as appropriate?	Х		
Are biological monitors present onsite?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Have wildlife been relocated from work areas?		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		Х	
Were any threatened or endangered species observed? If yes, list observations below:		Х	
Are there wetlands or water bodies present near construction activities?		Х	
Have there been any work stoppages for biological resources?		Х	
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			Х
Are archaeological and paleontological monitors onsite if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources?		Х	
Hazardous Materials			
Are hazardous materials stored appropriately?	X		
Are procedures in place to prevent spills and accidental releases?	Х		
Are appropriate fire prevention and control measures in place?	Х		
Is contaminated soil properly handled or disposed of, if applicable?	Х		
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?			Х
Is construction occurring within approved hours?	Х		
Are noise control measures in place within 100 feet of sensitive receptors as needed?			Х

AREAS MONITORED (i.e., structure numbers, yards, or substations)

Segments 1, 2 and 8

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)

I arrived onsite at 0600 hrs and attended the morning tailboard at the construction trailers within the Valley Substation. I met with the Environmental Project Manager (EPM), and we discussed the work activities and the areas I'd like to check on. One of the Wilson environmental monitors was at the tailboard along with the paleontological monitor.

The EPM, environmental monitor, and I drove to the road construction staging area within segment VIG1 at station 103E just off Vantage Road (Photo 1). I attended the road crew's 7am tailboard, introducing myself and reemphasizing the need for adequately placed secondary containment under the equipment. This crew started work late in the morning due to the residential homes along the transmission corridor. The days are also getting shorter, so it's still pretty dark at 6am. A bulldozer and a belly loader headed west from the staging area to continue work on building/upgrading the access road (Photo 2). A water truck was spraying the access road ahead of the construction equipment.

We traveled west along the transmission corridor; the topography was getting more rugged and will eventually require a 4x4 vehicle to access the work areas (Photo 3). The EPM said they have not had to relocate any wildlife and have only found one dead mammal in the roadwork excavation. They gave it to their SKR specialist, but that person could not identify it due to the condition of the carcass.

We drove to the San Jacinto River, which will be crossed several times by the transmission lines (Photo 4). This location is a temporary dry drainage, but the EPM said it supports streamflow during winter. I noticed patches of the invasive and nonnative tamarisk, also called Salt Cedar and Arundo donax. I inquired whether SCE built any habitat enhancement conditions into the project since removing these patches would greatly benefit the riparian corridor.

Heading east toward the staging area, we stopped at the gabion installation location (Photo 5). The paleontological monitor was overseeing this work, and so far, they had not seen any sensitive material. A water truck was on site suppressing dust. Several burrows could be seen within the transmission corridor, many flagged. The EPM did not know what the flagging indicated. One of the construction crew did not have a WEAP sticker on his hard hat. The environmental monitor verified they received training and a sticker.

Afterward, we drove west down Highway 74, where a crew continued the underground conduit installation (Photo 6). We stopped at pole site 245, where a large tubular steel pole (TSP) will be installed. The drilling crew for this large TSP is supposed to arrive within a week or two.

At pole site 213, a crew was attempting to drill the hole for the wooden pole, but because of the rock, it's progressing slowly. According to the environmental monitor, the hole was about 6 feet deep. So they fenced off the site (Photo 7) and covered the hole for safety and to prevent wildlife from falling in (Photo 8). Some of the newly installed wooden poles can be seen in Photo 7.

I asked about work at the new laydown yard along Highway 15, but the EPM said nothing new was completed.

MITIGATION MEASURES VERIFIED (Refer to MMCRP Report only on MMs pertinent to your observations today)

All of the project personnel appeared to be WEAP trained.

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

Check on habitat enhancement possibilities.

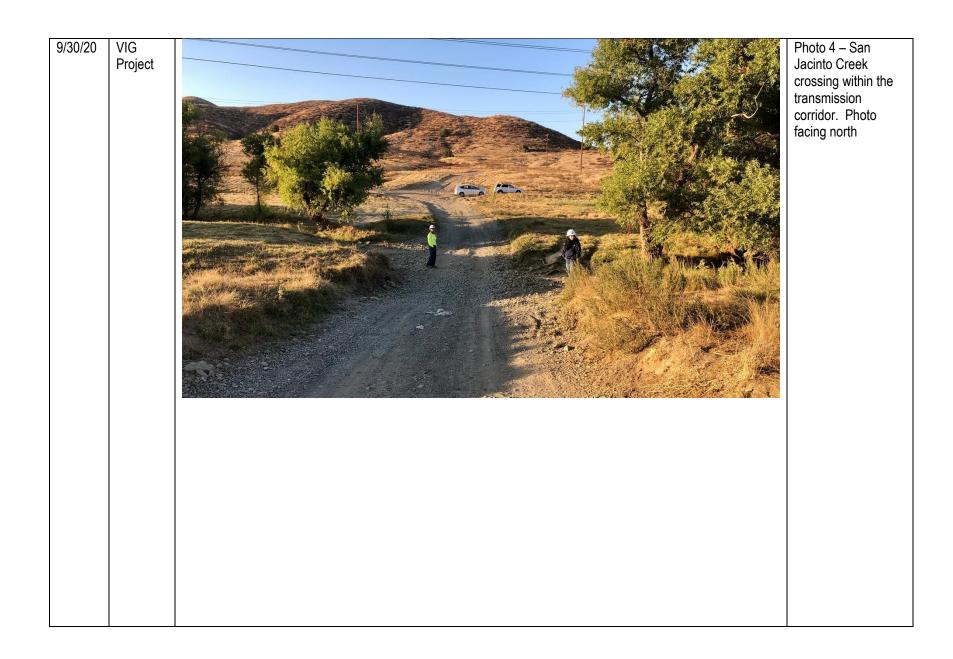
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site,

environmental observations of note)
COMPLIANCE SUMMARY Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.
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PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:



REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description	
9/30/20	VIG Project		Photo 2 –Equipment working the access road. Photo facing northwest	













Completed by:	Compliance Monitor	
Firm:	Ecotech Resources, Inc.	
Date:	10/5/20	

Reviewed by:	Manager	
Firm:	Ecotech Resources, Inc.	
Date:	10/06/20	