

November 7, 2020

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

Re: Monthly Report Summary #4 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 October 1 to 31, 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.
- NTP #3 (October 29, 2020) – Construction on select activities for the VIG Project throughout segments VIG1, VIG2, VIG3, VIG4, VIG5, VIG6, VIG7, and VIG8 at sites requiring jurisdictional waters permits, NTP-3 would include installation of overhead 115-kV subtransmission line and fiber optic line on new structures, and transfer of existing distribution circuits along the subtransmission line to new 115-kV structures.

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 October 22, 2020. A site inspection report that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and project commitments (PCs) was completed for the site visit. This report is attached below (Attachment 1).

The CPUC did not issue a Non-compliance during the period from October 1 to 31, 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 October 2020 supplied a compliance summary and included a description of construction activities from October 1 to 31, 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 October 2020.

Public Concerns

There were no public concerns during October 2020.

Project Approvals

During October 2020, NTPR-3 was approved by the CPUC. Additionally, two Minor Project Refinement (MPR) were submitted by SCE and an existing MPR was approved by the CPUC during October 2020. Table 1 summarizes the VIG Project NTPR and MPR submittals and status for October 2020.

Table 1: Approvals for October 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.
NTPR-3	SCE is seeking a Notice to Proceed Request authorization for construction on select activities for the VIG Project throughout segments VIG1, VIG2, VIG3, VIG4, VIG5, VIG6, VIG7, and VIG8 at sites requiring jurisdictional waters permits, NTP-3 would include installation of overhead 115-kV subtransmission line and fiber optic line on new structures, and transfer of existing distribution circuits along the	Approved. NTP-3 issued on October 29, 2020.

	subtransmission line to new 115-kV structures.	
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 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.	Approved 8/14/2020
MPR No. 3	SCE proposes to expand 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 include 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 would be modified from an underground to an overhead configuration.	Under CPUC review
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.	Approved 10/2/2020
MPR No. 6	SCE seeks to utilize 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 include installing wood poles, guy anchors, conductor, fiber optic, and the transfer of distribution conductor from existing poles to the new 115-kV structures.	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

October 22, 2020



Valley – Ivyglen Subtransmission Project CPUC Site Inspection Form

Project:	Valley – Ivyglen Project	Date:	October 22, 2020
Project Proponent:	SCE	Report #:	VS008
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vincent Semonsen
CPUC PM:	Patricia Kelly, Energy Division	AM/PM Weather:	Overcast and cool, winds are calm
CPUC-CM (WSP):	Chuck Cleeves	Start/End time:	0600 hrs – 1000 hrs
Project NTP(s):	NTP-1.		

SITE INSPECTION CHECKLIST

	Yes	No	N/A
WEATP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	X		
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	X		
Are erosion and sediment control measures properly installed and functioning?	X		
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?	X		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	X		
Are work areas being effectively watered prior to excavation or grading?	X		
Is excessive fugitive dust leaving the work area?		X	
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	X		
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?	X		
Are vehicles/equipment turned off when not in use?	X		
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	X		
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?	X		
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?	X		
Are biological monitors present onsite?	X		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	X		
Have wildlife been relocated from work areas?		X	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		X	
Were any threatened or endangered species observed? If yes, list observations below:		X	
Are there wetlands or water bodies present near construction activities?		X	
Have there been any work stoppages for biological resources?		X	
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			X
Are archaeological and paleontological monitors onsite if needed?	X		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			X
Have there been any work stoppages for cultural/paleo resources?		X	
Hazardous Materials			
Are hazardous materials stored appropriately?	X		
Are procedures in place to prevent spills and accidental releases?	X		
Are appropriate fire prevention and control measures in place?	X		
Is contaminated soil properly handled or disposed of, if applicable?	X		
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?			X
Is construction occurring within approved hours?	X		
Are noise control measures in place within 100 feet of sensitive receptors as needed?			X

<p>AREAS MONITORED (i.e., structure numbers, yards, or substations)</p> <p>Segments 1, 2 and 8</p>
<p>DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)</p> <p>I was onsite for the 6 am tailboard held at the Valley Substation. The Environmental Project Manager introduced me, and I described my role in the project. The EPM had a crew of four onsite environmental monitors.</p> <p>Since my last site visit, the drilling subcontractor (Aldridge) was now on site and has been drilling and installing tubular steel pole (TSP) foundations. The EPM and I stopped to look at some of the newly installed TSPs outside the Valley Substation (Photos 1 & 2). According to the EPM, the spoil from the drilling excavation was spread out on the access roads. A water truck sprays the access roads at least once a day.</p> <p>We stopped at tower #0018E, about a half mile west of the Valley substation. The Aldridge crew drilled and poured the tower foundation yesterday and was now beginning to strip the forms (Photo 3). A concrete washout bin was on site, and the spoil pile was ringed with straw wattles (Photo 4). Unfortunately, the secondary containment under the larger pieces of equipment was relatively small, and they left some other construction materials in the drip pan (Photo 5). I pointed this out to the EPM, suggesting a larger pan without any materials, and she said she would bring it up with the Aldridge crew.</p> <p>We traveled where the transmission corridor crosses over Hwy 74, transitioning from Segments VIG1 and VIG2. At this location, a set of new TSPs numbered 162E through 166E were installed (Photo 6). Some equipment was parked at this location, all of which have a secondary containment matting underneath them; the matting is called Polyback. The polyback appears to work well as secondary containment, but it was covered in invasive seeds. The EPM and I discussed the conditions limiting the spread of invasive weeds, and she said all of the equipment was washed before being brought onsite. We agreed that the weed seed stuck in the polyback was not an issue since the polyback is new when it's laid out, and the seed was mostly burr clover, a species common to this area.</p> <p>At the intersection of Hwy 74 and Conard, where the project switches from Segment VIG2 to Segment VIG3, an Aldridge crew was working on the foundation for TSP #302E (Photo 7). This was a large foundation hole they had already drilled and covered with wooden beams (Photo 8). My concern with the wooden beams was that several gaps would allow small wildlife to fall into the hole; better coverage was suggested. They have installed some metal corrugated metal pipe (CMP) to line the foundation hole. Here, the secondary containment for the large equipment was just one tiny drip pan (Photo 9). The use of some polyback would be recommended for containment here.</p> <p>I drove back to pole sites 212 and 213, which had been left for the Aldridge team to drill (Photo 10). A crew arrived to upgrade the BMPs for these sites, adding additional fencing and securing the coverage (Photo 11).</p> <p>My last stop was at the Concordia Yard, which has being set up with exit/entry BMPs (Photo 12). They have also laid gravel throughout 6 acres (Photo 13). A crew arrived onsite to begin the installation of a particular type of sediment fencing around the yard, focusing on the southern border of the yard that runs along an ephemeral drainage (Photo 14).</p>
<p>MITIGATION MEASURES VERIFIED (Refer to MMCRP Report only on MMs pertinent to your observations today)</p> <p>All of the project personnel appeared to be WEAP trained.</p>
<p>RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)</p> <p>Check on habitat enhancement possibilities.</p>
<p>COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)</p> <p>Secondary containment needs to be upgraded.</p>


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:

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
10/22/20	VIG Project		Photo 1 – Newly installed TSPs 003 and 004 just west of the Valley Substation. Photo facing east

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
10/22/20	VIG Project	 A photograph showing a wide, unpaved dirt road in the foreground, leading towards a series of high-voltage power line towers. The towers are steel lattice structures with multiple cross-arms. The sky is overcast and grey. There are some trees and bushes along the sides of the road. The overall scene is an industrial or utility site.	Photo 2 –A number of newly installed TSPs heading west from the Valley substation. Photo facing west

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
10/22/20	VIG Project		Photo 3 – A crew member getting ready to take the forms off of tower #0018E. Photo facing east

10/22/20

VIG
Project



Photo 4 – The spoil pile from drilling the foundation hole at tower site #0018E. Photo facing north

10/22/20

VIG
Project



Photo 5 –
Secondary
containment under
some equipment –
note the small size
of the drip pan and
the material in it.

10/22/20

VIG
Project



Photo 6 – New
TSP's were installed
Where segment 1
reaches Hwy 74.
Photo facing east

10/22/20

VIG
Project



Photo 7 –
Foundation work at
Pole site 302E.
Photo facing south

10/22/20

VIG
Project



Photo 8 – The foundation hole had been drilled and covered overnight with wood planks. Photo facing east

10/22/20

VIG
Project



Photo 9 – The very small drip pan under the drilling rig.

10/22/20

VIG
Project



Photo 10 -
Excavation site for
wooden pole #212.
Photo facing west

10/22/20

VIG
Project



Photo 11 – Drilling
operation to begin at
pole site #213.
Photo facing west

10/22/20

VIG
Project



Photo 12 – Entrance
to the Concordia
yard with exit/entry
BMPs installed.
Photo facing east

10/22/20

VIG
Project



Photo 13 – Gravel
has been spread out
over the entire 6
acres of the
Concordia yard.
Photo facing east

10/22/20

VIG
Project



Photo 14 – Silt fencing and construction fencing will be installed around the entire yard. An ephemeral drainage exits just to the south of the yard. Photo facing east

Completed by:	Compliance Monitor
Firm:	Ecotech Resources, Inc.
Date:	10/27/20

Reviewed by:	Manager
Firm:	Ecotech Resources, Inc.
Date:	10/27/20