January 18, 2021

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

Re: Monthly Report Summary #6 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 December1 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 December 1 and 16, 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 December 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 December 2020 supplied a compliance summary and included a description of construction activities from December 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 December 2020.

Public Concerns

There were no public concerns during December 2020.

Project Approvals

During December 2020, one Minor Project Refinement (MPR) was submitted by SCE and two existing MPRs were approved by the CPUC. Table 1 summarizes the VIG Project NTPR and MPR submittals and status for December 2020.

Table 1: Approvals for December 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.	Approved 11/25/2020
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.	Approved 12/1/2020

MPR No. 7	SCE proposes to use 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 include installing guy anchors, conductor, fiber optic, and telecommunication and subtransmission vaults.	Approved 12/18/2020
MPR No. 8	SCE proposes to utilize additional work areas and land disturbances not	

Sincerely,

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

ATTACHMENT 1

CPUC Site Inspection Reports
December 1 and 16, 2020



Valley – Ivyglen Subtransmission Project CPUC Site Inspection Form

Project:	Valley – Ivyglen Project	Date:	December 1, 2020
Project Proponent:	SCE	Report #:	VS011
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vincent Semonsen
CPUC PM:	Patricia Kelly, Energy Division	AM/PM Weather:	Sunny, warm with a slight breeze
CPUC-CM (WSP):	Chuck Cleeves	Start/End time:	1345 hrs – 1615 hrs
Project NTP(s):	NTP-1.		

SITE INSPECTION CHECKLIST

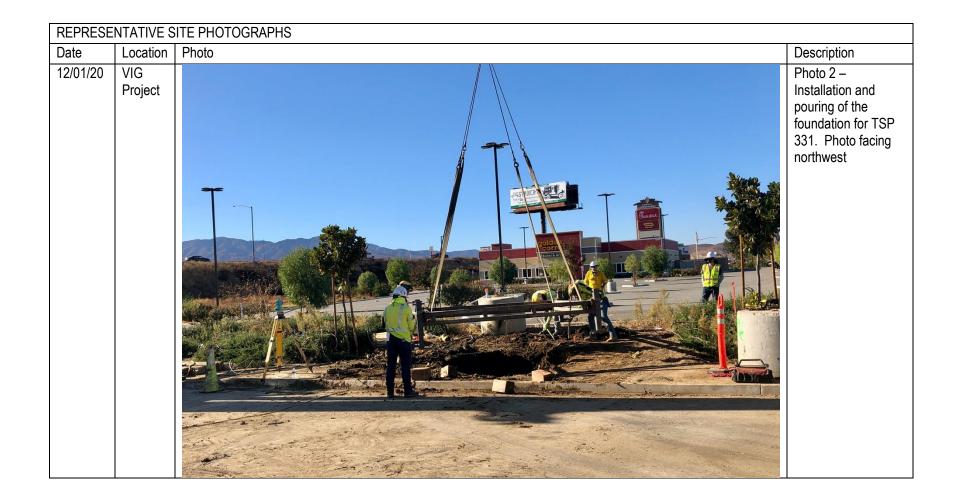
WEATP Training	Yes	No	N/A
Has WEAP training been completed by all new hires (construction and monitors)?	Χ		
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	Χ		
Are erosion and sediment control measures properly installed and functioning?	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?	Х		

Are all excavations and trenches covered at the end of the day?		Х	
·	Х		
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	۸		
Biology			
Have preconstruction surveys been completed for biological (coastal California gnatcatcher, least Bell's vireo, southwestern will flycatcher, rare plants) resources as appropriate?	Χ		
Are biological monitors present onsite?	Χ		
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?	Χ		
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?	Χ		
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
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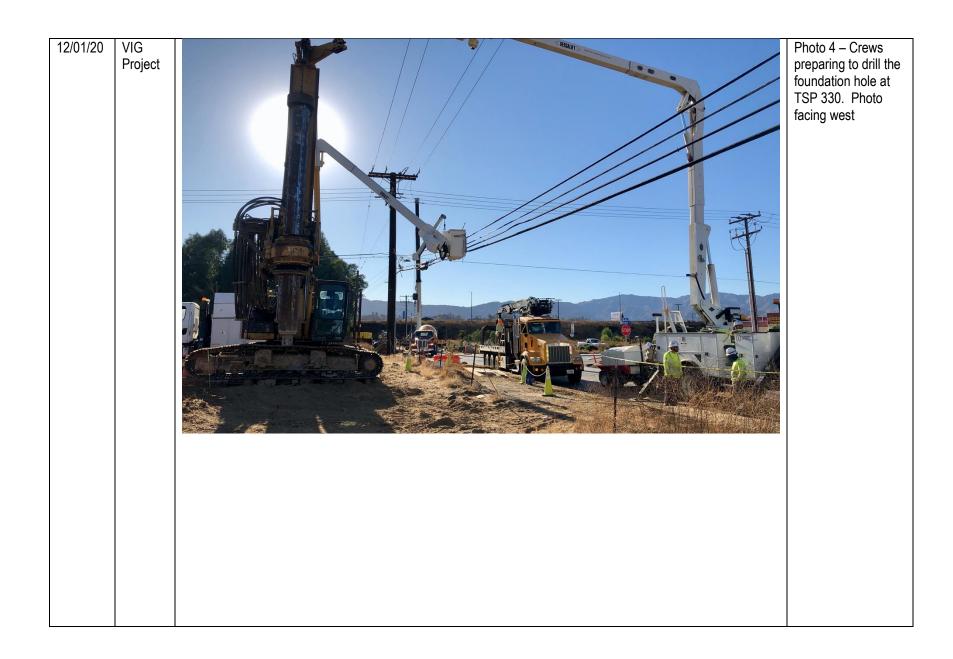
AREAS MONITORED (i.e., structure numbers, yards, or substations) Segments 1, 2, 7 and 8 DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews) I met with the lead environmental inspector (LEI) at tower 304E at the corner of Hwy 74 and Conard Ave. The conduit and foundation were installed, but the tubular steel pole (TSP) was not erected (Photo 1). The LEI said that even though they would return to this site to put up the TSP, they would spray the disturbed area with the mulch/tackifier mix. We drove west to Segment VIG3 where crews were working on tower sites 330, 331, and 333. The LEI said she wasn't sure why but there was no TSP #332. Instead, a crew had drilled the foundation hole for tower 331, placed the rebar cage in the hole, and poured cement (Photo 2). A concrete washout bin was nearby (Photo 3). Another crew was setting up to drill the TSP foundation hole at tower site 330 (Photo 4). Previously, they had attempted to drill the foundation hole at site 333 but encountered some obstructions, so they covered it with wooden mats until they could figure out how to proceed (Photo 5). We drove to Segment VIG4 where crews were working on the drilling and pouring of TSP foundations. They had already installed the foundations for TSPs 405 and 408 (Photo 6). The area next to TSP 408 was utilized as a staging area and will eventually be used as a pulling location. Several areas near these TSPs supported a sensitive plant; they were staked off with signage installed (Photo 7). A crew was pouring the foundation for TSP 409 and was just about to install the anchor bolt cage (Photo 8). They were also in the process of mobilizing over to the 410 and 411 pole sites. The staging area and access road were arid and dusty; I asked the LEI if they could get a water truck to conduct dust suppression (Photo 9). Within a few minutes, a water truck was onsite. TSP site 412E was near an ephemeral drainage; the LEI discussed with the drilling foreman whether they could avoid impacting the creek bank (Photo 10). The foreman said they would be able to stay out of the drainage. We drove to the Ivyglen Substation, where several TSPs were to be installed. An oak tree and a large native shrub (sugar bush) was located near one of the pole sites. Pruning of the sugar bush may be required (Photo 11). 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) Dust control should be done several times a day. 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:	





Date	Location	Photo	Description
12/01/20	VIG Project		Photo 3 – Concrete washout basin near TSP 331. Photo facing north







VIG Project 12/01/20

Photo 7 – A staked off area of botanical sensitivity between TSPs 408 and 409. Photo facing northeast









Completed by:	Compliance Monitor
Firm:	Ecotech Resources, Inc.
Date:	12/09/20

Reviewed by:	Manager
Firm:	Ecotech Resources, Inc.
Date:	12/09/20



Valley – Ivyglen Subtransmission Project CPUC Site Inspection Form

Project:	Valley – Ivyglen Project	Date:	December 16, 2020
Project Proponent:	SCE	Report #:	VS012
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vincent Semonsen
CPUC PM:	Patricia Kelly, Energy Division	AM/PM Weather:	Sunny, mild temps with a slight breeze
CPUC-CM (WSP):	Chuck Cleeves	Start/End time:	1400 hrs – 1630 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?	Х		

A	. v		
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?	Х		
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?	Χ		
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?			X
Are archaeological and paleontological monitors onsite if needed?	Χ		
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?	Χ		
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, 4, 5, 7 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 met with the lead environmental inspector (LEI) at 1400 hours near tower 045E, which was at the Hwy 74 crossing. SCE had strung the wire from tower sites 007E to 073E and across Hwy 74 (Photo 1). Best management practices (BMPs) were installed around this tower site (Photo 2).

The project will shut down at the end of the week for the Christmas and New Year holidays, restarting on Jan 4th. The LEI and I discussed the measures being installed to seal up the sites for the next several weeks. One of the environmental inspectors checked on the project BMPs, picked up trash, and verified the coverage of any open excavations. They were also pouring open dirt slopes with a tackifier.

We drove west to 413E, where during my last site visit two weeks ago, crews were drilling and pouring the foundations for 409 and 410. The foundations had now been set and poured for TSPs 412 and 413 (Photo 3). Unfortunately, TSP 412 foundation was drilled without a Paleo monitor which was in violation of the project permit conditions. The LEI wrote up a noncompliance report for the incident but explained that it was a classic case of miscommunication. The paleontological monitor arrived while the drilling was about half done and could check the tailings; nothing of significance was discovered.

We drove north to a small section of Segment VIG5, where a lot of construction occurred. An onsite tree crew was removing large Eucalyptus trees within the transmission corridor (Photo 4). Another crew was pouring the foundation for TSP 449 (Photo 5). The concrete trucks were washing out in the designated concrete washout location (Photo 6). The foundation hole hit groundwater, so they were pumping out the water while the concrete pour was being performed. A drill rig was set up at TSP 450 and drilled a small portion of that foundation hole (Photo 7). The drill rig was idling, and I asked the LEI if it needed to be running; she was going to check with the crew about it.

At Segment VIG7, the shoofly poles installed along the east side of the roadway were energized so crews could begin work on the new/permanent TSPs on the west side of the road (Photo 8).

Our last stop was at the Ivyglen Substation, where SCE had installed several TSP foundations in the creek bank adjacent to the substation (Photo 9). The LEI said the drilling and pouring of the foundations went well, with no dirt or concrete spilling into the creek. There was flowing water in this small drainage; the runoff appeared to come from a mining operation upstream of the substation. The wire-backed silt fencing looks to have caught the small amounts of dirt sloughing down the creek bank.

A drill rig was parked across the street from the substation (Photo 10). Another foundation hole had been partially drilled at this location, with tailings stockpiled onsite and wooden mats covering the hole (Photo 11). The wooden mats worked well to keep people from accessing the excavation, but there were many openings where small animals could enter and fall into the hole. The LEI called about getting this hole covered with plastic. We also noted that most of the parked equipment had secondary containment under it (Photo 12); however, one piece of equipment did not have any secondary containment and the LEI called in about that too.

The creek corridor below the work area had quite a bit of muddy sediment; at some locations, it looked several feet deep. The LEI was aware of this and had speculated that it came from the mining operation upstream of the Ivyglen project site; it is evident that it did not come from the drilling operation.

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)

Dust control should be done several times a day.

Any excavations should be sealed so that small animals cannot enter them.

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance of environmental observations of note)	on-site,
COMPLIANCE SUMMARY	
Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this infor on the monitoring datasheet and document with photographs.	rmation
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 imp	pacted.
New non-compliance issues reported by SCE monitors since your last visit. Describe issues and resolution "compliance suggestions or additional observations" (above) and include SCE report identification number.	under
PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:	

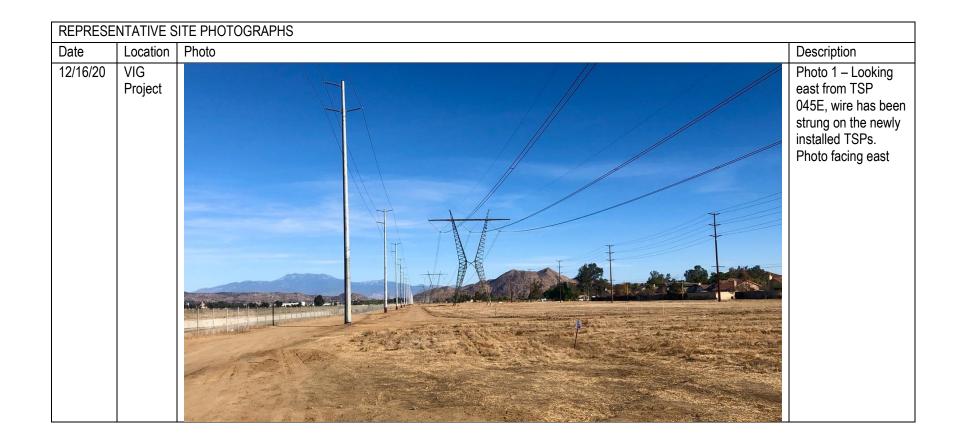






Photo 4 –
Eucalyptus trees
being trimmed and
removed along
Segment 5 near
TSPs 449 and 450. VIG Project 12/16/20 Photo facing northwest

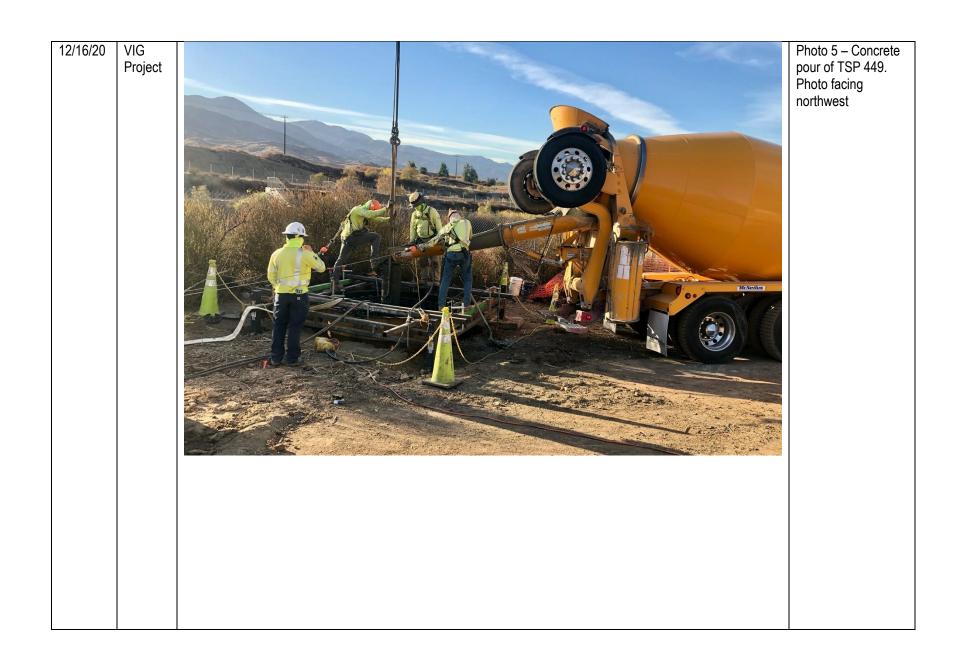
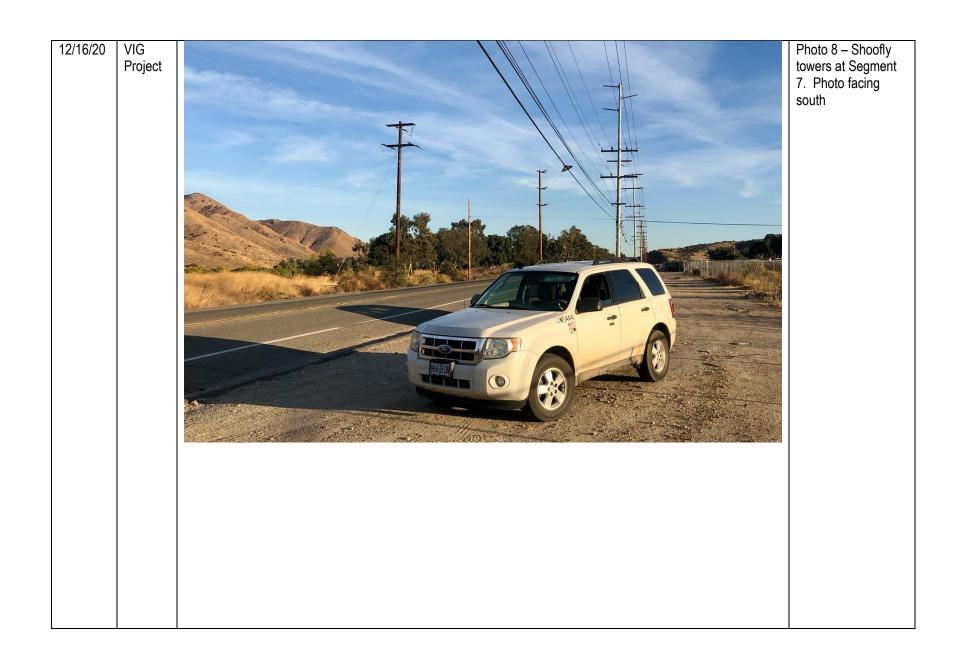




Photo 6 – Concrete washout station for the work at TSPs 449 and 450. Photo facing southwest

12/16/20 VIG Project

Photo 7 – Partial drilling operation at TSP 450. Photo facing north





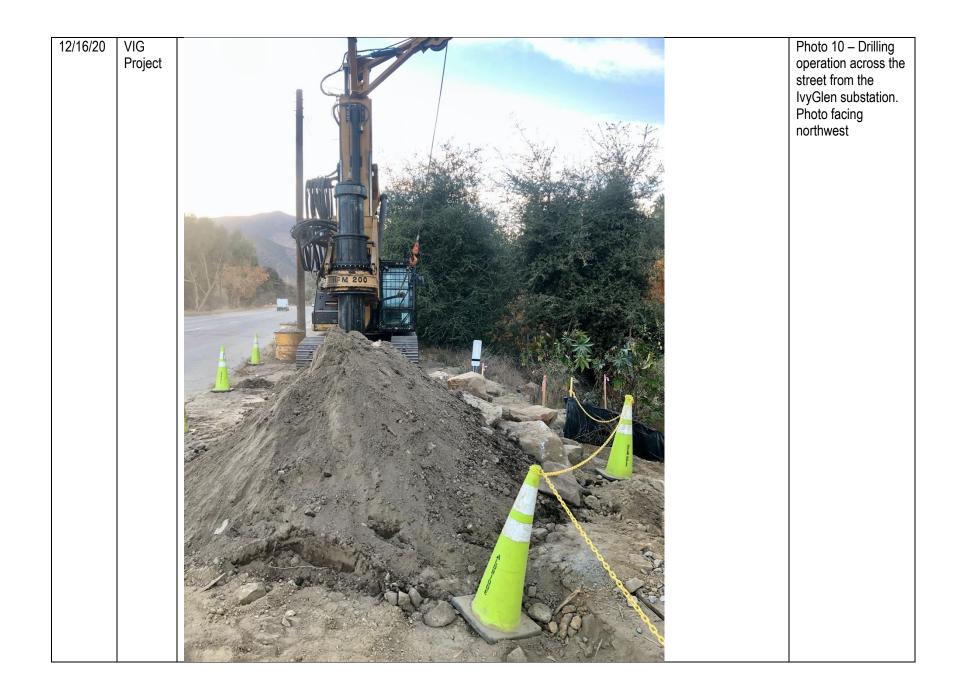




Photo 12 – Secondary containment under parked equipment. 12/16/20 VIG Project AN7Y59 00000

Completed by:	Compliance Monitor
Firm:	Ecotech Resources, Inc.
Date:	12/20/20

Reviewed by:	Manager
Firm:	Ecotech Resources, Inc.
Date:	12/23/20