



235 Montgomery Street, Suite 935, San Francisco, CA 94104-3002
Tel. 415-955-4775, Fax 415-955-4776, www.aspeneg.com

**PROJECT MEMORANDUM
SCE EL CASCO SYSTEM PROJECT**

To: Lynne Mosley, CPUC
From: Vida Strong, Aspen Project Manager
Date: July 2, 2009
Subject: Report #2: March 1, 2009 –June 27, 2009

CPUC ENVIRONMENTAL MONITOR (EM): Lynn Stafford

CPUC EM, Lynn Stafford, was on site March 12th and 17th, April 15th, May 8th and 29th, and June 12th and 26th, 2009.

The SCE El Casco Project includes the following components:

- Construction of the new El Casco 220/115/12-kilovolt (kV) substation within the Norton Younglove Reserve, Riverside County, California;
- Replacement of approximately 15.4 miles of existing single-circuit 115 kV subtransmission lines with new, higher capacity single-circuit 115 kV subtransmission lines and replacement of support structures within existing SCE ROWs in the Cities of Banning and Beaumont and unincorporated Riverside County;
- Rebuilding 115 kV switchracks within Zanja and Banning Substations in the Cities of Yucaipa and Banning, San Bernardino and Riverside Counties, respectively;
- Installation of telecommunications equipment at the El Casco Substation and at SCE's existing Mill Creek Communication Site, San Bernardino County; and
- Installation of fiber optic cables within public streets and on existing SCE structures between the Cities of Redlands and Banning in San Bernardino and Riverside Counties, respectively.

The following compliance and construction activities occurred during the subject time period:

EL CASCO SUBSTATION

Summary of Activity:

The entire vegetation removal activity at El Casco Substation site was completed during the week of February 23rd through 27, and was reported in Report #1.

No additional construction activity has occurred at the El Casco Substation site since the vegetation removal and mowing at the substation site and adjoining temporary work space and access road during Report Period #1. Compliance activities related to vegetation clearing are discussed below.

On May 8, 2009, SCE submitted the Notice to Proceed (NTP) request for the construction of the El Casco Substation and associated HDD bore work and conduit installation under San Timoteo Creek, and construction of three adjacent towers. The pre-construction compliance process is currently underway. Pending pre-construction compliance submittals for the El Casco Substation NTP request include: public facility coordination, biological surveys, regulatory permit submittals, Frac-out Plan, SWPPP finalization, outstanding hydrology submittals, finalized Traffic Control Plan and associated coordination and permit acquisitions, as well as visual mitigation submittals.



115 kV SUB-TRANSMISSION LINE REPLACEMENT

Summary of Activity:

The NTP request for the 115 kV sub-transmission work was submitted to CPUC by SCE on March 3, 2009. The pre-construction compliance process is currently underway. Pending pre-construction compliance submittals for the sub-transmission element include: public facility coordination, biological surveys, regulatory permit submittals, SWPPP finalization, outstanding hydrology submittals, geotechnical investigation submittals, finalized Traffic Control Plan and associated coordination and permit acquisitions, as well as visual mitigation submittals.

BANNING SUBSTATION

Summary of Activity:

The NTP request was submitted to CPUC by SCE on April 10, 2009 for the Banning Substation work. The pre-construction compliance processes are currently underway. Pending pre-construction compliance submittals for the Banning Substation include: public facility coordination, regulatory permit submittals, SWPPP finalization, outstanding hydrology submittals, geotechnical investigation submittals, finalized Traffic Control Plan and associated coordination and permit acquisitions, as well as visual mitigation submittals.

On April 27, 2009, biological surveys were conducted by biologists from Natural Resources Consultants at the Banning Substation site. This survey indicated that the construction activity will be in compliance with the Project's biological mitigation measures. The CPUC Environmental Monitor field verified the survey on May 29, 2009.

ZANJA SUBSTATION

Summary of Activity:

The NTP request was submitted to CPUC by SCE on June 19, 2009 for the Zanja Substation work. The pre-construction compliance processes are currently underway. Pending pre-construction compliance submittals for Zanja Substation include: public facility coordination, biological surveys, regulatory permit submittals, SWPPP finalization, outstanding hydrology submittals, geotechnical investigation submittals, finalized Traffic Control Plan and associated coordination and permit acquisitions, as well as visual mitigation submittals. Potential EIR Addendum materials for work not previously analyzed in the EIR are also outstanding.

On April 23, a Temporary Extra Workspace (TEWS) was issued by the CPUC EM for storage of fiber optic materials within the existing Zanja Substation, Yucaipa, San Bernardino County. SCE has been notified that if they wish to continue to use the Zanja Substation for material storage beyond 60 days that a variance request needs to be approved by CPUC.

MILL CREEK COMMUNICATION SITE

Summary of Activity:

The NTP request for the Mill Creek Communication Site was submitted to CPUC by SCE on June 19, 2009. The pre-construction compliance process is currently underway. Pending pre-construction compliance submittals for the Mill Creek element include: public facility coordination, biological surveys, regulatory permit submittals, SWPPP finalization, outstanding hydrology submittals, geotechnical investigation submittals, finalized Traffic Control Plan and associated coordination and permit acquisitions, as well as visual mitigation submittals. Potential EIR Addendum materials for work not previously analyzed in the EIR are also outstanding.

FIBER OPTIC CABLE INSTALLATION

Summary of Activity:

The NTP request for the entirety of the fiber optic work (not including the HDD bore) was submitted to CPUC by SCE on March 5, 2009. However, on May 15, SCE requested authorization from the CPUC to commence with construction of the underground fiber optic elements in the cities of Banning and Beaumont. This separate NTP request was due to pending pavement rehabilitation work in this area by the City of Beaumont. The request was granted by CPUC on May 22, 2009. The pre-construction compliance process is currently underway for the remaining fiber optic work. Pending pre-construction compliance submittals for the fiber element (HDD work not included) include: public facility coordination, regulatory permit submittals, Cultural Resources Report for areas along the fiber line not previously investigated, SWPPP finalization, finalized Traffic Control Plan and associated coordination and permit acquisitions, as well as visual mitigation submittals. Biological surveys were submitted for the remainder of the fiber optic circuit on June 23rd. That submittal has been reviewed and field validation by the CPUC EM commenced June 26th.

Biological surveys along the Banning and Beaumont segment were conducted by biologists from Natural Resources Consultants at the site on May 14 and June 10. These surveys indicated that the construction activity will be in compliance with the Project's biological mitigation measures. The CPUC EM field verified the surveys on May 29 and June 12, 2009. Construction workers received environmental training on June 16 prior to commencement of construction activities. The training was conducted by SCE personnel and addressed biological resources and issues, cultural resources and issues, and the Project's Storm Water Pollution Prevention Plan (SWPPP).

Construction within the cities of Banning and Beaumont began on June 16 at the western end of the 5000-foot conduit system. The construction activity consists of installation of two 5-inch conduits within a thirty-six-inch-deep trench excavated into First Street in Beaumont and Sun Lakes Boulevard (contiguous roadways) in Banning. Seven manholes, for cable pulling purposes, also will be installed in five-foot-deep excavations.

The crew was working on Friday, June 26 during the CPUC EM tour. Installation began at the west end of the segment on First Street and proceeded eastward 850 feet to the Beaumont/Banning city boundary where First Street becomes Sun Lakes Boulevard. Crews are occupying one lane of a divided four lane road (see Figure 1). The site was well marked for traffic control. The CPUC EM observed no traffic problems. Construction activity is occurring close to some young trees planted in the median strip, but it does not appear the disturbance to any roosting birds would be significantly greater than normal traffic.

CONSTRUCTION YARDS & OTHER WORKSPACE NEEDS

Variance Request #1 for a laydown yard immediately south of SCE's existing Maraschino Substation in the City of Beaumont, Riverside County, was requested on April 1 and approved by CPUC on April 16, 2009. Construction of the laydown yard began on May 28 and was completed by June 12, 2009. The eastern third of the lot was fenced off to exclude the vegetated portions of the site (see Figure 2). The existing fence was moved thirty-five feet north to ensure its location within the property owner's parcel. Gravel base was hauled in and placed (see Figures 3 and 4). An asphalt entranceway was created and a locked gate was installed. A yard superintendent's trailer will be installed with electric power from a nearby utility pole. Biological and cultural resource surveys were conducted by Live Oak & Associates and NRC, respectively, at the site on March 9 and then again May 26 which confirmed the previous findings. These surveys indicated that the construction activity will be in compliance with the Project's biological and cultural resource mitigation measures. The CPUC Environmental Monitor field verified the surveys on March 12 and May 8.

As of June 26, several transmission towers have been stored in the yard. The yard trailer has been hauled in, but is not yet hooked up. Nor has the porta-potty arrived. Otherwise, the yard looks completed, including locked gate (see Figures 4 and 5).

No requests for additional construction yards or other workspace needs have been submitted to date.

ENVIRONMENTAL COMPLIANCE

On March 16, 2009, a Project Memorandum was issued for El Casco Substation vegetation clearing activities by the CPUC EM for failure to implement Mitigation Measure B-18: Avoid active burrows or nests and relocate during non-breeding seasons. The pre-NTP biological survey indicated that “No badger dens, burrowing owl nest, or woodrat middens were located during the survey”. During vegetation clearing, more than twenty woodrat middens were discovered and moved. Some of the middens contained young and were moved to adjacent habitat within Younglove Reserve (see Figure 6). Other middens were empty and were placed in adjacent fields within the Reserve (see Figure 7). CPUC was not notified of the event until almost two weeks afterwards. The CPUC EM was provided the survey report at the beginning of clearance activities, and therefore, was unable to conduct a field verification. Please also note that during nest removal project equipment went outside of the approved work boundaries.

On April 2, 2009, SCE submitted a response letter where SCE addressed the issues raised in the Project Memoranda. According to the CPUC Memorandum, LOA’s survey report should have stated that “it was impossible to survey for woodrat middens” instead of implying that a valid survey had been conducted. SCE acknowledges that this report should have included more detail. However, at the same time, SCE also believes that Aspen’s Memorandum was not entirely accurate in its description and depiction of the vegetation that existed prior to the removal activities. As stated both SCE and LOA now understand the level of detail that is required in all future reports to the CPUC (please note that shortly there after LOA was replaced by NRC as the biological consultant). In total, 26 middens were exposed on the dense chaparral hillside. LOA determined that the best ecological approach would be to deconstruct the middens and rebuild any that might be occupied. During the relocation efforts, LOA determined that 8 of the 26 middens were occupied; two of the woodrats had young. SCE acknowledges that Mitigation Measure B-18 was not properly implemented. SCE provided that they would put measures in place to ensure future compliance with project mitigation measures. SCE acknowledged that the CPUC notification delay was inappropriate. SCE instituted a communications protocol (as requested by the Project Memorandum) to avoid the recurrence of this error. In regard to the five middens that were left in the open meadow the intent was to have them hauled off with other debris. As provided by SCE, authorization to leave this debris behind should have involved coordination with the appropriate personnel from the Riverside County Regional Park and Open-Space District. Although work areas were clearly marked, SCE acknowledged that construction equipment went outside of the approved work boundary in the attempt to relocate several middens. SCE was unaware of this activity at the time and agreed that a variance should have first been obtained from the CPUC.

Table 1 provides a summary of the Non-Compliance Reports (NCRs) and Project Memorandum (PM), and other incidents (i.e., spills, etc.) for the SCE El Casco System Project.

TABLE 1
NCRs, PROJECT MEMORANDUM, & OTHER INCIDENTS
 (Updated 07-02-09)

Type	Date Issued	Description
PM #1	03/16/09	Failure to comply with Mitigation Measure B-18 before, during and after vegetation clearing at the El Casco Substation site. Construction equipment went outside of approved Project boundaries.

NOTICE TO PROCEED (NTP) SUMMARY

Table 2 summarizes the NTPs submitted, reviewed, and issued to date for the SCE El Casco System Project.

**TABLE 2
NOTICES TO PROCEED
(Updated 07-02-09)**

NTP #	Date Requested	Date Issued	Description
#1	02/20/09	02/23/09	Vegetation clearing activities at the future El Casco Substation Site located in the Norton Younglove Reserve Area in Riverside County.
#2	05/15/09	05/22/09	Construction of the underground fiber optic elements of the El Casco System Project in the Cities of Banning and Beaumont.
	03/03/09	Under review	115 kV Sub-transmission lines replacement.
	03/05/09	Under review	Fiber optic cable installation, remaining (see NTP #2).
	04/10/09	Under review	Banning Substation
	05/08/09	Under review	El Casco Substation construction.
	06/19/09	Under review	Zanja Substation
	06/19/09	Under review	Mill Creek Communication Site

VARIANCE & TEWS REQUEST SUMMARY

Tables 3 and 4 summarize the Variance and Temporary Extra Workspace (TEWS) Requests submitted, reviewed, and issued to date for the SCE El Casco System Project, respectively.

**TABLE 3
VARIANCE REQUESTS
(Updated 07-02-09)**

Variance #	Date Requested	Date Issued	Description
#1	04/01/09	04/16/09	Usage of an empty fenced lot immediately south of SCE’s existing Maraschino Substation, Beaumont, Riverside County, as a laydown yard to support Project construction.

**TABLE 4
TEMPORARY EXTRA WORK SPACE REQUESTS
(Updated 07-02-09)**

TEWS #	Date Requested	Date Issued	Description
#1	04/17/09	04/23/09	Fiber Optic material storage at the pre-existing Zanja Substation, Yucaipa, San Bernardino County

PROJECT PHOTOGRAPHS



Figure 1: Installation of underground FOC conduit is occurring on First Street in Beaumont and on Sun Lakes Boulevard in Beaumont.

Approximately 850 feet of conduit was placed in First Street.

The installation then crossed Highlands Springs Road (behind the backhoe, and was beginning to be placed in the left hand westbound lane of Sun Lakes Boulevard on Friday, June 26. Construction activities included trenching, laying of conduit, backfill, compaction, and resurfacing with asphalt. Traffic control was adequate and no other environmental issues were observed by the CPUC EM. The photograph faces westward.



Figure 2: The vegetated portion of the Maraschino Laydown Yard site parcel was excluded from the actual yard. The photograph was taken prior to yard construction and faces eastward.



Figure 3: The Maraschino Laydown Yard was prepared by light scraping and removal of vegetation, and hauling in and spreading of gravel base. The photograph was taken during preparation of the yard and faces northward.



Figure 4: The Maraschino Substation Laydown Yard has been completed. The yard office trailer is on site, but has not been electrically connected and is not yet functional. The south border fence (in foreground) was moved northward thirty-five feet to ensure that the Yard is wholly located on one property. The straw wattling at the base of the south border fence was placed to prevent siltation onto adjacent property. The entrance gate is to the left in the foreground and has an asphalt driveway connecting from Veile Street. The photograph faces northward.



Figure 5: Transmission towers are being stored at the Maraschino Substation Laydown Yard. The east border fence which separates the yard from the vegetated portion of the property is beyond the stacked towers. The photograph faces northeastward.



Figure 6: The active woodrat middens at the El Casco Substation site were placed in adjacent habitat by equipment within the Norton Younglove Reserve.



Figure 7: Abandoned woodrat middens at the El Casco Substation site were placed in adjacent fields by equipment within the Norton Younglove Reserve.
The photograph faces southeastward.