



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: September 8, 2009
Subject: Report #5: August 16, 2009 –August 29, 2009

CPUC ENVIRONMENTAL MONITOR (EM): Lynn Stafford

CPUC EM, Lynn Stafford, was on site August 26th, 27th, and 28th, 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 switchcracks 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.

On August 10, 11, 12, and 14, 2009, during the prior reporting period, Natural Resource Consultants (NRC) biologists conducted a focused bird nest survey at the El Casco Substation, access road, and proposed culvert construction sites. After discussions with a Santa Ana Watershed Association least Bell's vireo biologist, and with SCE personnel, it was agreed that the NRC biologists (certified for vireo surveying) would search for evidence of vireo nesting in the riparian forest along San Timoteo Creek within 300 feet of the proposed culvert construction site. All surveying along the remainder of the riparian area adjacent to the project sites would be confined to observation from above the bank of the creek outside the riparian vegetation.



On August 17, 2009, the report of the above survey was produced. Shortly after, it was sent to CPUC. On August 28, 2009, the CPUC EM conducted a field validation of the survey and report. The focused nest survey by NRC appears to have been thoroughly and accurately executed. The reports and map are well prepared and document thoroughly the survey. The surveyors concluded that at the time of the survey, towards the end of the 2009 bird nesting season, there were no active nests currently within 300 feet of the proposed culvert activities, not within the proposed El Casco Substation, access road, and a 300-foot buffer surrounding these areas. The field validation by the CPUC EM concurred with the conclusions of the NRC survey.

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. All pending pre-construction compliance submittals for the El Casco Substation NTP request have been satisfied with the exception of items which will become conditions of the NTP such as outstanding regulatory permit submittals, Frac-out Plan, railroad coordination and encroachment permit acquisitions. It is anticipated that the NTP approval shall be distributed in the next week. The NTP for the El Casco Substation was issued by CPUC on August 31.

BANNING SUBSTATION

Summary of Activity:

The NTP for the Banning Substation work was granted by CPUC on August 13, 2009. A Clearance Biological Survey was conducted by NRC biologists on August 14, 2009 during the prior reporting period. The report of this survey was produced by NRC on August 17, 2009, and presented to CPUC on August 18. On August 19, 2009, the CPUC EM emailed SCE a validation of the Clearance Biological Survey.

On August 21, 2009, SCE requested a modification of the Banning Substation NTP, labeled El Casco NTP #3, MOD #1. This modification added work to be conducted at three existing transmission line poles located outside of the substation, one on Williams St., one on Nicolet St., and one within the backyard of a private residence between Williams and Nicolet Streets, and at one pole located on the northwest corner of the substation. The request incorrectly indicated that the pole on Williams St. is on the north side of the street. It is actually on the south side. El Casco NTP #3, MOD #1 was approved by CPUC on August 26, 2009. One of the conditions of the approval was that prior to construction “pre-construction clearance surveys” shall be provided, and validated by Aspen/CPUC.

NRC biologists conducted the pre-construction survey on August 21, 2009. The report of this survey was produced on August 25, and delivered to CPUC on August 25. The CPUC EM arrived at the location of the three transmission poles at 0730 hours, August 27, 2009, to begin conducting the field validation of the pre-construction survey. However, it was apparent that construction was already in progress. A SCE crew was in the process of working on the pole along Nicolet St. (see Figure 1). There was no SCE Environmental/Biological Monitor present. There were heavy vehicle tracks leading to the pole in the backyard, and there was evidence of recent work at the pole on Williams St. (see Figure #2). Because of the premature start of construction, the field validation of the biological survey by the CPUC EM took place during and after construction activity. The CPUC EM agreed with the NRC report that there were no signs of sensitive plant or animal species within 500 feet of the three pole locations surveyed, nor was there sign of any bird nesting activity within that buffer area. On August 31, a Project Memorandum was issued by CPUC documenting the start of construction without completion of required biological clearances.

On August 28, 2009, the SCE crew performed work on the pole at the northwestern corner of the Banning Substation. An NRC Biological Monitor was present during the construction activity (see Figure 3).

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 sub-

mittals for Zanja Substation include: public facility coordination, biological surveys, outstanding hydrology submittals, geotechnical investigation submittals, 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 was 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. The approved TEWS area has not been used to date; however, SCE has requested permanent use of the subject area during construction as part of their NTP request for the Zanja Substation.

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, outstanding hydrology submittals, geotechnical investigation submittals, finalized as well as visual mitigation submittals. Potential EIR Addendum materials for work not previously analyzed in the EIR are also outstanding.

FIBER OPTIC CABLE (FOC) 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 as NTP #2 by CPUC on May 22, 2009. NTP #4 for the remainder of construction of the fiber optic elements of the El Casco System Project was issued by CPUC on August 27.

A Biological survey report for the remainder of the fiber optic circuit had been submitted previously. During the prior reporting period, a follow-up survey report was submitted for the Zanja Shoofly FOC route to reflect the actual location of the route. Other minor changes and corrections in the report have been made.

Construction within the cities of Banning and Beaumont began on June 16 at the western end of the 5000-foot underground conduit system, and was completed in early August. The construction activity consisted 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 were installed in five-foot deep excavations. During the prior reporting period, final repaving was completed, and the staging area vacated.

The next FOC work to begin will be the segment between the Mentone and Zanja Substations. This work will begin after pre-construction biological surveys and CPUC validation are completed during the following reporting period.

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: regulatory permit submittals, outstanding hydrology submittals, geotechnical investigation submittals, as well as visual mitigation submittals.

The report on the methods, results, and conclusions of the Pre-NTP Survey for Biological Resources on Segment 2 of the proposed Subtransmission Cable Route was submitted to SCE by Natural Resource Consultants on July 27, 2009. This report has been field validated by the CPUC EM.

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 yard is currently being used for the storage of materials, including transmission towers.

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

ENVIRONMENTAL COMPLIANCE

- Reframing and roll phasing work on three poles of the Devers-Banning-Windpark-Zanja 115 kV line began before the additional biological survey for El Casco NTP #3, MOD #1 could be validated by CPUC. This action was out of compliance with the El Casco System Project Environmental Impact Report and the Mitigation Monitoring Compliance and Reporting Program for the Project.
- During the week of August 17, a SCE crew unloaded materials for the Banning Substation work at the substation. At the Banning Substation worker environmental awareness program (WEAP) training, a foreman realized that the early mobilization was in violation of the Banning NTP. SCE took corrective action to refine its internal communication process to accurately reflect what steps are required after receiving the NTP. SCE's goal is to ensure all construction crews know delivering equipment is the start of construction and that all NTP conditions and requirements must be met first.
- The repeated initiation of construction prior to approval, points to ongoing SCE internal communication issues. A Project Memoranda was issued on August 31, requesting that SCE submit a communication protocol. It was also noted that another similar infraction could lead to a Project shut down.
- WEAP training was given to the Banning Substation crew on August 20 and to the Fiber Optic Cable crews on August 27 in preparation for upcoming work on those projects.

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 09-08-09)

| 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. |
| Incident | 8/21/09 | A SCE internal noncompliance at the Banning Substation was issued for mobilization of the site before environmental training and biological pre-construction sweep were conducted. |
| PM #2 | 08/31/09 | The initiation of construction activity before CPUC authorization and validation of the biological survey at the site of the NTP #3, MOD #1 pole work in Banning. |

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 09-08-09)**

| 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. |
| #3 | 04/10/09 | 08/13/09 | Banning Substation |
| NTP #3, MOD #! | 8/21/09 | 8/26/09 | Banning Substation work modifications, and phasing work on three poles outside of the substation. |
| #4 | 03/05/09 | 8/27/09 | Fiber optic cable installation, remaining (see NTP #2). |
| #5 | 05/08/09 | 08/31/09 | El Casco Substation construction. |
| | 03/03/09 | Under Review ¹ | 115 kV Sub-transmission lines replacement. |
| | 06/19/09 | Under Review ¹ | Zanja Substation |
| | 06/19/09 | Under Review ¹ | Mill Creek Communication Site |

1. Compliance submittals pending.

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 09-08-09)**

| 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 09-08-09)

| 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 |
| #2 | 07/20/09 | | Staging area in a vacant lot north of First Street and west of Highland Springs Road. |

PROJECT PHOTOGRAPHS



Figure 1: Work on pole A1320675E of the Devers-Banning-Windpark-Zanja line on the north side of Nicolet St. in Banning occurred on August 27, 2009. No Biological Monitor was present. The CPUC validation of the pre-construction biological survey had not yet been completed. The photograph was taken at 0730 hours, August 27, 2009, and faces westward.



Figure 2: Evidence of work on pole A1320677E of the Devers-Banning-Windpark-Zanja line on the south side of Williams St. in Banning was visible at 0720 hours on August 27, 2009. This evidence included ground disturbance, grounding wires, and temporary wiring at the upper cross bars. The CPUC validation of the pre-construction biological survey had not yet been completed. This pole was incorrectly identified as being on the north side of Williams St. in the NTP #3, MOD #1 request. The photograph faces southward.



Figure 3: On August 28, 2009, work occurred on pole A1335682E, located at the northwest corner of the Banning substation. A biological monitor from NRC (right side of photograph) was present during this activity). The survey validation had been completed by CPUC on the previous day. The photograph faces westward.