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PROJECT MEMORANDUM
SCE EL CASCO SYSTEM PROJECT

To: Lynne Mosley, CPUC
From: Vida Strong, Aspen Project Manager
Date: September 15, 2009
Subject: Report #6: August 30, 2009 – September 12, 2009

CPUC ENVIRONMENTAL MONITOR (EM): Lynn Stafford

CPUC EM, Lynn Stafford, was on site September 3rd and 9th, 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.

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. NTP #5 for the El Casco Substation NTP request was granted by CPUC on August 31, 2009.

On August 31 and September 1, 2009, Natural Resource Consultants (NRC) biologists, on behalf of SCE, conducted a pre-construction clearance biological resource survey at the El Casco Substation, access road, and proposed culvert construction sites. On September 1, 2009, the report of the above survey was produced. Shortly after, it was sent to CPUC. The surveyors concluded that the status of previously mapped resources have not changed since earlier surveys. The NRC team discovered two new resource locations. One is a population of approximately 30 smooth tarplant (see Figure 1). The other is a small stand of California walnut



(see Figure 2). On September 3, 2009, the CPUC EM conducted a field validation of the survey and reported on the validation. The clearance survey by NRC appears to have been thoroughly and accurately executed. The reports and map are well prepared and document thoroughly the survey.

Construction activity at the culvert relocation site is scheduled to begin during the week of September 14, 2009.

BANNING SUBSTATION

Summary of Activity:

Reframing and roll phasing work on three poles of the Devers-Banning-Windpark-Zanja 115 kV line just north of the Banning Substation and a pole at the northern edge of the substation as indicated in El Casco NTP #3, Mod #1 was completed during the prior reporting period. No further work occurred at the substation during the subject reporting period.

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, 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, 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 approved by CPUC on August 27, 2009.

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 36-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.

The next FOC work to begin will be the segment between the Mentone and Zanja Substations. This work will begin during the following reporting period. The pre-construction biological survey by NRC was completed on September 2 and 3, 2009, and reported on September 4. The CPUC validation was conducted on September 9, and reported on September 10, 2009. At present, construction work is scheduled to begin on September 17, 2009.

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, 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 NRC 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

- Validation of the pre-construction biological resource clearance survey for the El Casco Substation culvert work was conducted by the CPUC EM on September 4, 2009. During that site visit, a male Anna's hummingbird exhibited a territorial/courtship aerial display in a patch of tree tobacco (*Nicotiana glauca*) within the culvert relocation work area (see Figure 3). NRC Ornithologist, Dr. Lee Jones, subsequently met the CPUC EM at the site. Both Dr. Jones and the CPUC EM doubt that this species is nesting at this location (quite exposed) this late in the nesting season. No evidence of a nest was located. The area will be swept immediately before construction begins by a NRC Biological Monitor. The area will continue to be monitored during construction.
- Validation of the pre-construction biological resource clearance survey for the Mentone to Zanja Fiber Optic Cable work was conducted by the CPUC EM on September 9, 2009. The CPUC EM had not been given the locations of probable tree-trimming within that five-mile stretch. During the field validation the CPUC EM met with NRC Biologists, Eric Kline and Scott Duff. The NRC Biologists shared their information on proposed tree-trimming. Both the CPUC monitor and the NRC Biologists agreed that the tree-trimming locations provided by the SCE FOC crew probably are incomplete. The biological sweep conducted by NRC personnel immediately before the tree-trimming during the following reporting period will complete the clearance survey for the tree-trimming activity.
- During the clearance survey for the Mentone to Zanja FOC route, the NRC Biologists located several new sensitive biological resources. These include several newly observed nest cavities in trees, a large mammal burrow and several wood rat middens. No significant impacts are anticipated as a result of proposed construction activities, with the inclusion of NRC's recommendations for flagging, avoidance and monitoring for each identified resource.
- It was noted by both the NRC Biologists and the CPUC EM that the dirt road along the Mentone to Zanja FOC route south of Highway 38 on Map 2 has been recently graded (see Figure 4). This road

had been in poor condition with vegetation growing within it during the May 2009 Pre-NTP biological survey. That vegetation was removed by the grading. Apparently, the grading was done by SCE as part of standard Operation and Maintenance, and not as part of the current El Casco Systems Project. It is unknown if a pre-grading biological survey was conducted.

- For the remaining sections of the FOC route, NRC personnel will accompany SCE FOC personnel and mark the position of every tree-trimming location prior to construction.
- WEAP training was given to the Banning Substation crew on August 20 and to the Fiber Optic Cable crews on August 27 of the previous reporting period 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 09-15-09)

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.
	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	8/27/09	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 09-15-09)

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
#4	03/05/09	8/27/09	Fiber optic cable installation, remaining (see NTP #2).
#5	05/08/09	8/27/09	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 09-15-09)

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 09-15-09)

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: During the El Casco Substation culvert work biological clearance survey, a new population of smooth tarplant was discovered. This group of 30 plants is in the grassy area surrounded by riparian vegetation adjacent to San Timoteo Creek. It will not be impacted by construction activities. Some of the tarplants can be seen in the right foreground as yellowish-green vegetation.

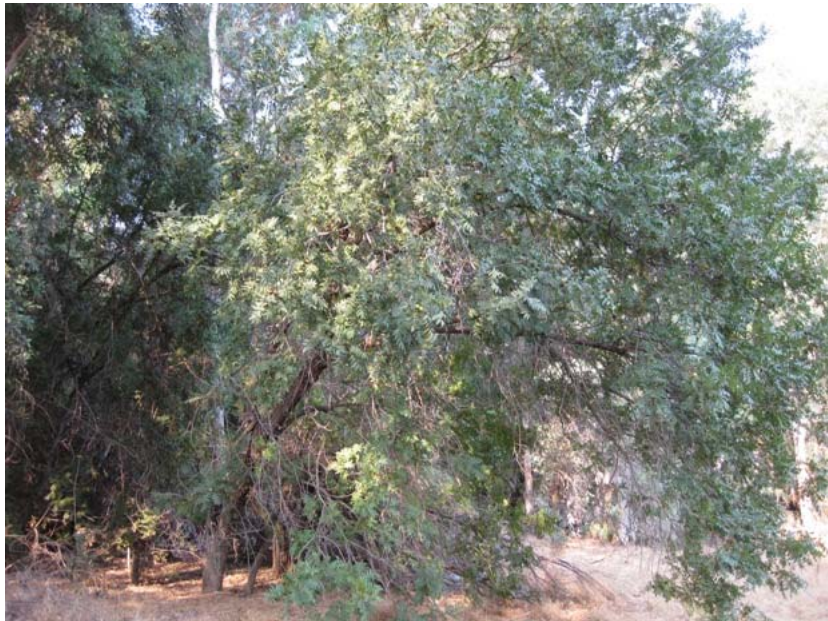


Figure 2: During the El Casco Substation culvert work biological clearance survey, a small stand of California walnut was discovered in the eucalyptus grove adjacent to the access road. This stand will be flagged for avoidance.



Figure 3: A male Anna's hummingbird was observed performing a territorial/courtship aerial display above the tree tobacco plants on the right side of the above dirt road. This road Tees into the El Casco Substation Access Road at the site of the proposed culvert replacement. The photograph faces southward.



Figure 4: This dirt road adjacent to the Mentone to Zanja FOC route south of Highway 38 was recently graded. The photograph faces westward.