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**PROJECT MEMORANDUM
SCE EL CASCO SYSTEM PROJECT**

To: Lynne Mosley, CPUC
From: Vida Strong, Aspen Project Manager
Date: October 8, 2009
Subject: Report #8: September 27, 2009 – October 3, 2009

CPUC ENVIRONMENTAL MONITOR (EM): Lynn Stafford

CPUC EM, Lynn Stafford, was on site September 30th, and October 1st and 2nd, 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 initial vegetation removal activity at El Casco Substation site and at the new access road occurred during the week of February 23rd through 27, and was reported in Report #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 October 1, SCE submitted a Variance Request to allow the installation of two water tanks and above ground water piping to facilitate watering activities at the El Casco Substation site. This request is under review.

The pre-construction clearance biological resource survey at the El Casco Substation was conducted by Natural Resource Consultants (NRC) on August 31 and September 1, 2009, access road, and proposed culvert construction sites and was reported on by September 1, 2009. The CPUC EM conducted and reported on a field validation of the survey on September 3, 2009.

Construction activity at the culvert relocation site on the access road and at the substation site began during the week of September 14, 2009 in the prior reporting period.



During the subject week, the cultural controlled excavation was completed. Spoils from the excavation have been used to create an equipment parking area and the beginning of the road on which to move the drilling rig for future geotech testing. That rig will probably be used beginning the following week.

Terracing of the hillside began on Wednesday of the subject week. Beginning from the top of the hill at the southeastern corner of the sub-station site, a bulldozer began shaping the hillside into terraces for material stabilization.

BANNING SUBSTATION

Summary of Activity:

The NTP for the Banning Substation work was granted by CPUC on August 13, 2009. MOD #1 to NTP #3 for additional work to be conducted at three existing transmission line poles located outside of the substation was approved by CPUC on August 26, 2009. On October 1, a Variance Request was submitted to allow alternate access into the Banning Substation. The request is under review.

No 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: 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 September 29, biological surveys were submitted for the Zanja Substation work. Field validation is required..

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: 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. On September 30, a modification request to NTP #4 was submitted to allow tree trimming activities along the FOC work. NTP #4 Mod #1 was approved by CPUC on October 2. On October 1, SCE submitted a Variance Request to allow work on two shoo-fly segments. The request is under review.

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.

Installation of the FOC segment between the Mentone and Zanja Substations began on September 17, during the prior reporting period. The pre-construction biological survey by NRC had been 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.

FOC crews worked on the Mentone to Zanja segment on Monday and Wednesday of the subject week. Installation of the framing arms and placement of pulling rope on the Mentone to Zanja segment were completed with the accompaniment of the California Highway Patrol at certain locations on Highway 38. On Saturday, September 3, cable installation occurred at the Zanja Shoo-fly.

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, and outstanding hydrology, geotechnical, visual and biological survey 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.

On September 22, 2009 SCE submitted a Variance Request for several geotechnical and hydrological Mitigation Measures related to the 115 kV Subtransmission Line Element. A site visit including SCE and Aspen personnel is scheduled for October 5, 2009 to review the subject Variance Request.

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

- Biological, cultural resource, and other mitigation monitoring was conducted by NRC, LSA, and RMT consultant field monitors at both the El Casco Substation and the FOC work areas. In addition, SCE provided air quality monitoring. Monitors representing pertinent environmental issues were present with each construction crew at all times during construction.
- Dust control was maintained throughout the El Casco Substation and access road sites during the subject reporting period in spite of occasional high winds.
- The controlled excavation of a pre-determined sensitive cultural resource area within the El Casco Substation site was completed during the subject week. In addition to the concrete pipe discovered during the prior week, a two inch by two inch fossil bone was retrieved from the site. It will be analyzed by a paleontologist. The CPUC EM was notified within a few minutes of the find.

- The erection of silt fencing on the San Timoteo Creek border of the existing access road and the edge of the El Casco Substation site was completed during the subject week. This fence will prevent siltation from the site into San Timoteo Creek, and restrict Project activity near the creek.
- The culvert under the access road was treated with concrete slurry and a steel plate covered with dirt to provide temporary protection from the weight of heavy equipment during the prior week. The activity did not impact the adjacent riparian area.
- The contractor at El Casco Substation is using access roads south of the Substation site to reach the top of the hill within the Substation site with vehicles, equipment, and water trucks. These are pre-existing roads. There will be no disturbance of natural habitat off the roads.
- An NRC botanist discovered a small population of *Kochia scoparia*, a non-native weed that is a relative to Russian thistle on the access road to be used to reach the hilltop described above. After consultation with the NRC Lead Biologist and the CPUC EM, the plants on the road were removed, bagged, and taken to a county landfill. The purpose was not eradication of the weed from the site, but prevention of accidental transportation to other Project sites, since this species has not been identified by earlier Project studies to occur elsewhere on Project sites. Also, the botanist discovered a small population of another non-native weedy relative of *Kochia* called *Bassia hysoppifolia*. This population is on the hillside being terraced. Since it also is not known from other Project sites, the plants will be intentionally buried under the terracing in order to prevent seed dispersal.
- Cultural resource personnel removed several historical artifacts from the hillside that will be terraced. These had been discovered and left in place during the initial vegetation clearing in February 2009. These artifacts include pulleys, a hoe blade, and a shovel. They are evidently remnants of earlier farming activity.
- Three new wood rat middens were discovered on the hillside being terraced. These were found in emerging vegetation (scrub oak) sprouting from the earlier vegetation clearing. At least one appeared to be occupied. Under supervision of NRC biologists, they were relocated to nearby similar vegetation. The CPUC EM was informed of the incident.
- Security is now on duty at the entrance gate twenty-four hours, seven days per week.
- Documents for the permitting of the trenching and placement of fiber optic cable conduit in the underground portions of the FOC route not already having conduit in place are being prepared by SCE.
- A site visit involving SCE and Aspen personnel to the sub-transmission line sites to resolve issues concerning geotechnical/hydrological mitigation implementation at pole installation sites will be conducted on Monday, October 5 of the following week.
- The CPUC EM received pre-construction clearance biological resource reports for the Banning Substation access variance (see Figure 1), the Zanja Substation work, the Banning and Calimesa Shoo-fly FOC segments (see Figure 2), and the FOC tree-trimming locations (223 locations). Field validation of all of these reports except the Zanja Substation work was conducted by the CPUC monitor on October 1 and 2. The reports were validated. One tree-trimming location was misidentified as not being a coast live oak, when it actually is. A few other tree-trimming locations were left off the report maps, but these will be included in the construction sweep by biologist monitors. The Zanja Substation report will be validated by the CPUC monitor during the following week.

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 10-08-09)

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.
	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 10-08-09)

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
#3 Mod #1	08/21/09	08/26/09	Modify work within Banning Substation and add work at 3 existing transmission poles located outside of the substation.
#4	03/05/09	8/27/09	Fiber optic cable installation, remaining (see NTP #2).
#4 Mod #1	09/30/09	10/02/09	Tree trimming.
#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 10-08-09)

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.
	09/22/09	Under Review	SCE has asserted within the variance request that several Geo & Hydro Mitigation Measures should not be required for the 115 kV Subtransmission Line Element. A site visit including SCE and Aspen personnel is scheduled for October 5, 2009.
	10/01/09	Under Review	FOC Shoo-fly
	10/01/09	Under Review	Placement of two watertanks and above ground pipe to feed water needs at he El Casco Substation site
	10/01/09	Under Review	Allow the installation of two water tanks and above ground water piping to facilitate watering activities at the El Casco Substation site.
	10/02/09	Under Review	Alternate Access to the Banning Substation.

TABLE 4
TEMPORARY EXTRA WORK SPACE REQUESTS
 (Updated 10-08-09)

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: SCE will be submitting a request to enter the Banning Substation during substation construction work via the alleyway on the north side of the substation called John Street. The eastern access to John Street involves a paved section with approximately six occupied homes along a street approximately 20 to 24 feet wide. Vehicles often park on the curb side of the street on the left. The photograph faces westward.



Figure 2: The Banning Shoo-fly FOC route is entirely within natural and rangeland habitat. It stretches from the San Gorgonio Creek (in the distance) west for two and one-half miles to Sunset Road. It crosses grasslands and brush-covered hillsides and ravines. Most of the route is accessible by existing SCE dirt roads. In areas not accessible by roads, crews will hand carry materials to the poles, using pile-climbing for installation. The photograph faces southeastward.