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**PROJECT MEMORANDUM
SCE DPV2 TRANSMISSION AND RED BLUFF SUBSTATION PROJECTS**

To: Billie Blanchard, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Date: October 31, 2011
Subject: Weekly Report 11, September 26 to October 2, 2011

INTRODUCTION

This report provides a summary of the construction and compliance activities associated with the SCE DPV2 Transmission and Red Bluff Substation Projects:

A summary of the Notices to Proceed (NTPs) with construction and Variance Request activity are also provided (see Tables 1 and 2, respectively, near the end of this report). Additionally, a summary of Temporary Extra Workspace Requests (TEWS) is provided in Table 3.

CPUC/Aspen Environmental Monitors (EM): Jamie Miner was on site September 27 and 28.

CPUC NTPS

DPV2 CONSTRUCTION AND MATERIAL YARDS

NTP #1 was issued for construction and set-up of construction yards, including the Devers, Desert Center 1 (DC1), Desert Center 2 (DC2), Blythe, Beaumont, Menifee, and Perris Construction Yards.

Summary of Activity:

1. With the exception of the Perris location, construction yard activities were limited to minor tasks, such as trailer maintenance and lighting equipment deliveries. Activities at the Perris Construction Yard included vegetation clearance, gravel delivery and spreading, fence installation, and implementation and maintenance of BMPs.

Environmental Compliance:

1. Observations confirmed by the CPUC EM as reported by the SCE Biological Monitor(s) included:
 - a. The fencing surrounding the Environmentally Sensitive Areas (ESAs) for Harwood's milk-vetch at the Blythe Construction Yard was inspected and considered intact.
 - b. ESA fencing surrounding two ironwood trees (of which, one supporting a summer roosting nest for verdin that is no longer active) at the Desert Center 1 Construction Yard was inspected and considered intact.
 - c. Exclusionary fencing surrounding several ironwood trees at the Desert Center 2 Construction Yard was inspected and considered intact.
 - d. Nesting bird netting was observed on equipment and materials at the Menifee Construction Yard.
 - e. During a monitoring site visit on September 30 at the Beaumont Construction Yard, project speed limits were observed to be maintained and no fugitive dust originating from the project site was detected.



- f. Throughout the reporting period, BMPs, secondary containment areas, and dust suppression activities were observed intact and considered adequate at the Perris Construction Yard.
2. A 47-foot section of privacy screening that was installed at the Perris Construction Yard consists of dimensions that are too short. The correct size was ordered and is pending delivery.

DPV2 EXCLUSIONARY FENCING AT 41 TOWER LOCATIONS

NTP #2 was issued by CPUC for the installation of Coachella Valley fringe-toed lizard (*Uma inornata*) and flat-tailed horned lizard (*Phrynosoma mcallii*) exclusionary fencing at 41 tower locations between the Devers Substation and Indio.

Summary of Activity:

1. During the subject period, exclusionary fencing activities were completed at six locations, including Towers #2012, #2015, #2016, #2017, #2240, and #2241. These activities included trenching and installation of fencing.

Environmental Compliance:

1. The SCE Construction Monitor reported that dust suppression activities were adequately implemented throughout the subject period and no fugitive dust was observed. Additionally, trucks and equipment were inspected for CA-registration and CARB stickers, respectively. Onsite inspections by the CPUC EM on September 27 confirmed these observations. Parking during work activities occurred along the existing access road which was approved by the CPUC EM under a TEWS request on September 29.
2. The CPUC EM met with the exclusionary fencing contractor and SCE monitors on September 27 to discuss and resolve several fencing locations that had been previously identified as supporting potential issues. These issues included implementing proper debris removal techniques, ensuring that potential biological resources were identified and/or avoided, and adequate parking for vehicles during construction. The CPUC EM was satisfied with the results of this meeting; however, construction at some of the towers was delayed due to ongoing discussions to resolve issues at specific tower locations. These include a drainage that was not identified during SCE's final jurisdictional waters delineation at Tower #2102 and potentially suitable habitat for Coachella Valley fringe-toed lizard that is present along the portion of the existing access road within the Coachella Valley Preserve. The CPUC EM maintained that the drainage at Tower #2102 appeared to meet the conditions, including an established bed and bank, for jurisdiction under CDFG, while SCE did not agree with that determination. Magdalena Rodriguez (CDFG) has since given permission for SCE to continue construction at the site and she will ultimately determine if the drainage will be included under CDFG jurisdiction (via email dated October 24). During a TEWS request inspection for parking along the existing access road (approved on September 29, with conditions), the CPUC EM identified suitable habitat for Coachella Valley fringe-toed lizard within the portion of the access road that occurs in the Coachella Valley Preserve (see Figure 1). This portion of the road supports loose, friable, wind-blown sand. As a result of this inspection, the CPUC EM did not approve parking along this portion of the access road in the TEWS approval. Subsequently, a Variance Request, with survey information, was submitted by SCE to provide parking at these locations.

BEAUMONT #2 CONSTRUCTION YARD

NTP #3 was issued for construction activities associated with the development of the Beaumont #2 Construction Yard.

Summary of Activity:

1. No activities associated with NTP #3 were conducted during the subject period.

INDIO CONSTRUCTION YARD

NTP #4 was issued for construction activities associated with the development of the Indio Construction Yard.

Summary of Activity:

1. No activities associated with NTP #4 were conducted during the subject period.

RED BLUFF SUBSTATION

NTP #5 was issued for upgrades of a segment of the existing SCE 12 kV circuit overhead distribution line to supply light and power to the Red Bluff Substation.

Summary of Activity:

1. No activities associated with NTP #5 were conducted during the subject period.

COLORADO RIVER SUBSTATION

NTP #6 was authorized for the construction and occupation of the following components associated with the CRS on non-BLM lands: (1) extension of an existing 33 kV distribution line to supply substation light and power; (2) installation of a telecommunications line; and, (3) access road improvements (including a new access road driveway) to serve the CRS.

Summary of Activity:

1. No activities associated with NTP #6 were conducted during the subject period.

BLM NTPS

DPV2 AND COLORADO RIVER SUBSTATION

BLM NTP #1 and a right-of-way grant were issued by BLM on September 19, 2011 for construction of the DPV2 Project on BLM lands, which included the Colorado River Substation (CRS) and associated components.

Summary of Activity:

1. Activities associated with the CRS during the subject period included installation and/or implementation of BMPs, mobilization of equipment and materials to site, installation of orange construction fencing around ESAs, existing access road improvements, new access road driveway blading, and trenching and installation for desert tortoise exclusionary fencing (see Figures 2 and 3).

Environmental Compliance:

1. On September 27, SCE monitors reported a Level 1 non-compliance incident associated with the blading of a section of access road without environmental monitors present. Biological and cultural monitors subsequently confirmed that no impacts to resources occurred as a result of the incident. SCE monitors met with the Construction Foreman and equipment operator to emphasize the need for monitoring presence during work activities.
2. Speed limit signs (15 mph) were installed along the entire length of the access road leading into the substation work site.

3. The CPUC EM observed adequate dust suppression techniques being implemented during the site visit and similar techniques were reported by SCE monitors throughout the subject period.
4. During desert tortoise exclusionary fence installation, trenching was conducted by hand crews in areas proximal to established ESAs.
5. With the exception of the non-compliance incident reported above, adequate monitoring was implemented throughout the subject period.

RED BLUFF SUBSTATION

BLM NTP #2 and a right-of-way grant were issued by BLM on September 19, 2011 for construction of the Red Bluff Substation and the Desert Center Communication Site.

Summary of Activity:

1. Installation of exclusionary fencing was initiated on September 26. Prior to these activities, minor improvements were conducted along the distribution line road to facilitate access for equipment and vehicles.
2. Additional activities conducted during the subject period included installation and/or implementation of BMPs and mobilization of equipment and materials to the site.

Environmental Compliance:

1. On September 26, a bobcat was rejected for entry to the project site due to excessive dirt that had accumulated within the tracks. The equipment was removed from the area and returned clean.
2. On September 28, a mini excavator was delivered with a washing receipt; however, clumps of dirt were still observed on the equipment. A second wash was required and the equipment was returned clean the same day. The CPUC EM noted the condition of the equipment after returning from the second wash (see Figure 4).
3. On September 29, an SCE Archeological Monitor and Native American Monitor identified an artifact onsite. SCE staff was immediately notified and a five-meter buffer was established around the artifact location using orange construction fencing.
4. Adequate logs were maintained for all workers requiring WEAP training throughout the subject period.
5. SCE monitors reported that traffic speeds were maintained and vehicles and equipment were properly inspected prior to moving throughout the subject period.
6. SCE monitor noted that 60 gallon lids are currently being used with 30 gallon trash cans. The lids are being kept in place by sandbags. The contractor committed to obtaining the appropriate sized lids.
7. A total of 8 cacti were salvaged that were either within or near the exclusionary fence line disturbance limits. Cacti were stored just offsite for transplantation at a later date.

No Non-Compliance Reports (NCRs) or Project Memoranda (PM) were issued for construction activities during the subject period.

AGENCY REPRESENTATIVES DURING CONSTRUCTION (OTHER THAN CPUC EMS):

Mark Masser (BLM) was present at the Red Bluff Substation project site on September 29 to inspect implementation of project mitigation measures. He reported no issues or areas of concerns.

CPUC/BLM NOTICES TO PROCEED (NTPS)

Table 1 summarizes the CPUC/BLM Notices to Proceed (NTPs) for the DPV2 and Red Bluff Projects, to date.

TABLE 1
NTPS
(Updated 10/31/11)

| NTP #/ Permit | Date Requested | Date Issued | Segment | Description |
|------------------|-------------------|-----------------|-----------------------------------|--|
| CPUC NTPs | | | | |
| NTP #1 | 04/28/11 | 06/23/11 | Yards | Authorization to proceed with the development of the Devers, Desert Center 1, Desert Center 2, Summit, Blythe, Perris, Beaumont, and Menifee Construction Yards. |
| NTP #2 | 08/05/11 | 09/09/11 | T/L | Installation of exclusionary fencing, Devers to Blythe. No cultural resources affected. Bio pending. |
| NTP #3 | 08/26/11 | 09/19/11 | Yards | Construction of Beaumont Construction Yard #2. |
| NTP #4 | 09/09/11 | 09/20/11 | Yards | Construction of Indio Construction Yard. |
| NTP #5 | 09/16/11 | 10/11/11 | Red Bluff Distribution Line | Upgrades to a segment of the existing SCE 12 kV circuit overhead distribution line to supply light and power to the Red Bluff Substation, non-BLM lands. |
| NTP #6 | 09/16/11 | 10/17/11 | Substation | Authorization to proceed with improvements to the new Colorado River Substation on private lands, including extension of the existing 33 kV distribution line, installation of a new telecommunication line, and access road improvements. |
| | 09/09/11 | Under Review | T/L – DPV1 | Construction activities associated with a minor relocation of the Devers-Valley No. 1 Line (DV1); waiting for response from SCE on request for additional information. |
| | 10/08/11 | Under Review | T/L – CRS to Red Bluff | Construction of the DPV2 transmission line between Red Bluff and Colorado River Substations and replacement of existing DPV1 overhead ground wire; non-BLM lands. |
| | 10/08/11 | Under Review | T/L – Devers to Red Bluff | Construction of the DPV2 transmission line between the existing Devers Substation and the new Red Bluff Substation; non-BLM lands. |
| | 10/08/11 | Under Review | T/L – Devers to Valley | Construction of the DPV2 transmission line between existing Devers and Valley Substations; not including San Bernardino National Forest lands. |
| BLM NTPs | | | | |
| BLM NTP #1 | 08/26/11 | 09/19/11 | DPV2 Substation, T/L | Authorization to proceed with construction of the DPV2 Transmission Line, Colorado River Substation, and associated project components on BLM lands. |
| BLM NTP #2 | 08/26/11 | 09/19/11 | Substation, | Construction of Red Bluff Substation and associated project components, BLM lands. |

VARIANCE & TEMPORARY EXTRA WORKSPACE REQUESTS

Variance Requests and Temporary Extra Workspace (TEWS) Requests submitted to date are summarized in Tables 2 and 3, respectively.

TABLE 2
VARIANCE REQUESTS
 (Updated 10/31/11)

| Variance Request | Date Requested | Date Issued | Segment # | Description |
|------------------|----------------|-------------|--|---|
| VR #1 | 05/06/11 | 05/24/11 | Devers-Valley | Construction of traditional lattice towers instead of "Tetra" towers at two locations (Structures #1139 and #1140) |
| VR #2 | 04/21/11 | 05/26/11 | All | Revisions to Mitigation Measure B-7d pertaining to seasonal restrictions for Coachella Valley fringe-toed lizard and flat-tailed horned lizard to support consistency with conditions provided in the Biological Opinion. |
| VR #3 | 07/12/11 | 07/18/11 | DC 1 & DC 2 Yards | Utilize offsite well location and installation of 12,000-gallon water tank for filling trucks. |
| VR #4 | 07/06/11 | 07/21/11 | Menifee Yard | Expansion of Menifee Construction Yard, which would include approximately 5 acres of additional disturbance within the western portion of the parcel, for material storage and other activities. |
| VR #5 | 04/22/11 | 07/28/11 | CRS Devers and Valley Substations, Series Capacitor Site | Modification of APM A-7 regarding carpooling for construction at substations. |
| VR #6 | 07/07/11 | 08/01/11 | Menifee, Beaumont, Perris Yards | Request to remove Mitigation Measures B-13a and B-13b, and to modify B-1a, B-1a (revised), and B-7e pertaining to Western Riverside County MSHCP compliance. |
| VR #7 | 08/11/11 | 08/22/11 | Perris, Beaumont, Menifee, Blythe Yards | Request to utilize offsite water hydrants at Perris, Beaumont, Menifee, and Blythe Construction Yards. |
| VR #8 | 08/26/11 | 08/27/11 | Beaumont Yard | Request to install seeded jute netting along the property frontage at Beaumont Construction Yard. |
| VR #9 | 08/24/11 | 09/01/11 | DC 2 Yard | Request for installation of temporary power poles outside of Desert Center 2 Construction Yard. |
| VR #10 | 08/26/11 | 09/01/11 | Devers & Summit Yards | Utilize offsite water locations needed for dust suppression at Devers and Summit Construction Yards. |
| — | 09/21/11 | Retracted | Perris Yard | Request for additional workspace involving vegetation clearing, installation of BMPs, and temporary driveway installation at Perris Construction Yard. |
| VR #11 | 09/26/11 | 09/28/11 | T/L | Two water sources for exclusionary fencing work. |
| VR #12 | 10/13/11 | 10/18/11 | T/L | Request for parking/temporary staging of vehicles along existing access road within the Coachella Valley Preserve during exclusionary fencing activities. |
| VR #13 | 10/18/11 | 10/27/11 | Substation | Request to install a temporary guard structure along the entrance of the existing transmission line access road for Colorado River Substation. |

| Variance Request | Date Requested | Date Issued | Segment # | Description |
|------------------|----------------|--------------|------------------|--|
| VR #14 | 10/19/11 | 10/27/11 | Substation | Request to approve 24-hour drilling operations at the CRS site. |
| | 10/25/11 | Under Review | Substation | Request to formalize changes to the Red Bluff MMCRP Mitigation Measure BIO-4 and Applicant Measure BIO-5. |
| | 10/26/11 | Under Review | Substation | Request to formalize clarifications to Mitigation Measure BIO-4 regarding plant salvage performance standards. |
| | 10/26/11 | Under Review | Devers Yard | Request for temporary power supply to provide power to construction trailer at the Devers Construction Yard. |
| | 10/27/11 | Under Review | Series Capacitor | Request for a slight expansion of the Series Capacitor site due to engineering conflicts. |

TABLE 3
TEMPORARY EXTRA WORKSPACE (TEWS) REQUESTS
(Updated 10/31/11)

| TEWS Request | Date Requested | Date Approved | Segment # | Description |
|--------------|----------------|---------------|--------------|--|
| #1 | 07/20/11 | 07/27/11 | Blythe Yard | Use of offsite hydrant and installation of water tank at location adjacent to Blythe Construction Yard |
| #2 | 07/28/11 | 08/04/11 | Menifee Yard | Use of offsite hydrant, located along the frontage of the Menifee Construction Yard, and a flexible hose to supply water to a 4,000 gallon water truck. |
| #3 | 08/16/11 | 08/16/11 | Menifee Yard | Revised use of offsite hydrant, located along the frontage of the Menifee Construction Yard, approximately 200 yards north of previously approved location. |
| — | 09/06/11 | Retracted | Devers Yard | Revised use of offsite hydrant, including installation of above ground pipeline and water towers. |
| #4 | 09/29/11 | 09/29/11 | T/L | Use of parking areas along primary access road within 400-ft total distance exclusionary fencing locations with exception of sites within the Coachella Valley Preserve. |

PROJECT PHOTOGRAPHS



Figure 1: Access road within the Coachella Valley Preserve that was rejected by the CPUC EM under a TEWS request for parking due to the presence of potential habitat for Coachella Valley fringe-toed lizard.



Figure 2: View southeast along access road to the CRS project site.



Figure 3: Desert tortoise exclusionary fencing activities underway at the CRS project site.



Figure 4: Mini excavator returned cleaned to Red Bluff project site after being initially rejected due to excess dirt.