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**PROJECT MEMORANDUM
SCE DPV2 TRANSMISSION PROJECT**

To: Billie Blanchard, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Date: November 15, 2011
Subject: Weekly Report 15, October 24 to October 30, 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 (TEWS) and non-compliance activities are provided in Tables 3 and 4 & 5, respectively.

CPUC/BLM/Aspen Environmental Monitors (EM): Jamie Miner and Rosina Gallego were on site October 24 through October 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. Through the subject period, SCE submitted daily and weekly monitoring reports for the Devers, Beaumont, Perris, and Menifee Construction Yards.
2. Activities at these yards consisted of ongoing dust suppression, material deliveries, office trailer maintenance, and general site maintenance.

Environmental Compliance:

1. SCE General Monitors reported that activities, including secondary containment, onsite spill kit, minimized track out, and dust suppression, were conducted to meet compliance at the Devers Construction Yard throughout the subject period.
2. SCE Biological Monitors reported that no special-status species were observed at the Devers, Beaumont, Menifee, or Perris Construction Yards during the subject period.
3. On October 25, two shallow electrical trenches (less than 1 foot in depth) were observed by the SCE Biological Monitor near the Menifee Construction Yard office trailer. Each of these trenches was delineated with orange cones and was ramped to allow for wildlife to escape.
4. The CPUC EMs conducted a field verification of SCE's pre-construction survey results for the Summit Construction Yard on October 26. Based on this site visit and the results of the survey, approval to initiate construction at this location was recommended with the condition that staking that remained from the original yard configuration be removed to avoid any confusion.



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 several locations, including Towers #2012, #2013, #2015, #2016, #2017, #2100, #2101, #2102, #2110, and #2113. Activities at these locations included trenching, fence installation, backfilling trenches, and fence clipping (see Figure 1).

Environmental Compliance:

1. The CPUC EM observed work crews working around fenced Environmentally Sensitive Areas (ESAs) established for Coachella Valley milk-vetch (CVMV) at Tower #2110 on October 25. ESAs for CVMV were avoided at other tower locations as reported by SCE Biological Monitors.
2. On October 24, two Coachella Valley fringe-toed lizards were observed at Tower #2110. One individual was caught by hand and released unharmed under a creosote bush 15 meters northwest of the northwest corner of the site in comparable habitat. The other CVFTL ran offsite unharmed. On October 25, one Coachella Valley fringe-toed lizard was observed at the same tower location and safely flushed offsite by SCE Biological Monitors. No other special-status species were identified in the work areas during the subject period.
3. A red flag warning was issued on October 26 and major construction associated with exclusionary fencing was halted for the day. During this time, activities were limited to a small crew conducting minor maintenance activities at several locations.
4. Throughout the subject period, SCE General Monitors reported that dust suppression activities were conducted and no fugitive dust was observed, trucks were observed to be CA-registered and heavy equipment had CARB stickers, portable toilets were observed to be set-up on secondary containment, no track out was observed, and all equipment was removed offsite at the end of the workday. Each of these observations was confirmed by CPUC EMs at Tower #2110 and #2102 during site visits to these locations.
5. On October 27, the CPUC EM confirmed that all vehicles were parked along the access road previously approved under TEWS request. The CPUC EM also verified that log sheets were updated and maintained for WEAP training, vehicle and equipment washing, and CA-registration and CARB requirements.

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. Major construction activities that occurred at the Indio Construction Yard during the subject period included site grading, installation of road base, paving of driveways, and construction of perimeter fencing (see Figure 2).

Environmental Compliance:

1. On October 24, the SCE SWPPP Inspector visited the site to inspect BMP conditions and confirmed that these conditions were in compliance.
2. On October 27, a City of Indio representative conducted a site visit for a final inspection of the fencing. The fencing was found to be acceptable and no follow up items were identified.
3. During the subject period, no track out was observed onsite, secondary containment area for vehicles and equipment parked onsite was observed to be in good condition and no tears or drips were observed, and no trash was observed onsite.

RED BLUFF SUBSTATION DISTRIBUTION

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 major construction activities associated with the Red Bluff Distribution Line occurred during the subject period. However, civil surveyors began work along the route on October 25. Measurements from survey markers to make topography maps, tie downs for intersections and streets were made, and corners of the work area were staked (approximately 500 ft x 500 ft). All work was completed on October 27, 2011.

Environmental Compliance:

1. A weed survey was conducted on the distribution line on October 23, 2011. No special status plant species were found, but one small population of Sahara mustard (*Brassica tournefortii*) seedlings were found in a wash on the north side of a large ironwood.
2. One adult male desert tortoise was detected along the distribution line route on October 23.

COLORADO RIVER SUBSTATION DISTRIBUTION

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. Major construction activities associated with the CRS Distribution Line were initiated on October 26. These included the establishment of the approved “drive and crush” road, boring for wooden pole placement, and installation of wooden transmission poles (see Figures 3 and 4).

Environmental Compliance:

1. The CPUC EM met with Sheree James (SCE) and Louis Utsumi (CH2MHILL) on October 24 to verify that disturbance limits were properly staked.
2. On October 24, the CPUC EM observed SCE Biological Monitors in the process of conducting clearance sweeps of the project area.

3. The CPUC EM met with the SCE Biological and Cultural Monitors onsite on October 26 to discuss the initiation of project activities. It was during this meeting that the CPUC EM was informed that one 4000-gallon water truck had become stuck in soft sandy soil off of an existing access road just east of the project area and outside of the defined disturbance limits (see Figure 5). A second piece of heavy equipment was utilized to remove the water truck from the area. Additionally, SCE monitors reported to the CPUC EM that another area adjacent to the existing access road along the northern limits of the project area and outside of the disturbance limits was being utilized. Several recent vehicle tracks were observed by the CPUC EM and it was confirmed that these were project related. This area was later flagged for avoidance with yellow caution tape by the SCE monitors (see Figure 6). Each of these areas occur within desert tortoise occupied habitat. Subsequently, a Project Memorandum was issued by the CPUC EM on October 28 after notifying SCE of these developments (see Table 4).
4. During the site visit on October 26, the CPUC EM identified a Mojave fringe-toed lizard that ran underneath one of the trucks being utilized to install distribution poles. The CPUC EM notified the SCE Biological Monitor of this observation and recommended that the truck not be moved until the lizard was safely out of any potential impact area. The following day, the SCE Biological Monitor reported to the CPUC EM that the lizard had safely left the work area soon after the observation.
5. On October 27, the SCE General Monitor identified a small oil leak from an unknown source along the access road (see Figure 7). The CPUC EM who was onsite was notified. Work crews immediately cleaned the spill by removing the contaminated soil with a shovel and transporting offsite.

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 and associated components.

Summary of Activity:

1. Major activities that occurred at the CRS site during the subject period included the installation of BMPs, set-up of the drill rig and auxiliary equipment for developing the water well, road maintenance, and mobilization of equipment and materials (see Figure 8).

Environmental Compliance:

1. Two non-compliance incidents were reported by the SCE General Monitor on October 24. The first of these (Level 0) was the discovery of a used cigarette butt found on the ground near a construction personnel vehicle. The SCE General Monitor notified Pat Gravener (ULM site rep). Pat Gravener spoke with Gary Nelson (Southwest Pump and Drilling foreman) and reiterated that “no smoking” rules would be discussed during the following day’s tailboard meeting. The second incident (Level 1) involved a mud tank that was delivered to the site on October 24. The arrival of the tank was not reported to the SCE General Monitor or the site representative. Therefore, the tank was not inspected for cleanliness upon arrival. The SCE General Monitor conducted an inspection after the tank had arrived and noted that the tank had less than one pound of dried mud caked on the sides and over 30 pounds lodged within the pipe frame. The tank was removed from the site and brought back clean (with receipts) the following day.
2. On October 25, Brian Cayton (SWPPP Coordinator) visited the site to ensure that BMPs were in compliance. No issues were reported.
3. On October 26, two minor spills (less than 1 gallon) of motor oil were reported by the SCE General Monitor. Each of these spills emanated from a crane truck and occurred only during long periods of

time when the vehicle was immobile. Each time, the contaminated soil was shoveled into a drip pan and disposed of in spill kit drums.

4. On October 26, the SCE General Monitor reported that an airman generator (#689) did not have a proper air regulations placard. A new generator was brought in to replace #689.
5. The SCE General Monitor reported on October 28 that high water pressure from an overfilled Baker tank caused a water leak at the doors of the tank and onto the soil resulting in a potential erosion risk (see Figure 9). The CPUC EM also noted this issue during an October 28 site visit. As a resolution, a hose was attached to the tank to drain water into the well, reducing the pressure and stopping the leak.
6. No special-status species were reported by the SCE Biological Monitors in the project area during 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. Final grading of the eastern access road and the access road within the fenced boundaries was completed on October 25.
2. A temporary laydown area (approximately 300 square feet) for the well drilling activities was constructed within the northwest corner of the site (see Figure 10).
3. An office trailer was placed on the southwest corner of the site on October 25. The area was cleared and graded with a 140H blade prior to placement.
4. Well drillers began mobilization on October 26 and 27. The equipment brought onsite during that time included water and slurry tanks, well conductor drill rig, gravel catcher, trimming, and hoses.

Environmental Compliance:

1. The CPUC EM met with the SCE Authorized Biologist on October 26 to discuss concerns related to road berms associated with new road construction along the eastern access road. It appeared that some of the new berms along that road may have been constructed in a fashion that would restrict desert tortoise passage. Upon further coordination, it was noted that there are no specific conditions in the Mitigation Measures or conditions of the BO for newly constructed road berms. Additionally, the Authorized Biologist confirmed that the road berms were not likely to present any issues related to desert tortoise.
2. One adult male tortoise was observed during the subject period on October 26 near the intersection of Corn Springs Road and the gas line access road. It is possible that this individual is the same individual that was previously identified in the area earlier in the month.
3. The CPUC EM confirmed that adequate BMPs, including dust suppression, secondary containment, wash logs, and removal of trash, were implemented throughout the subject period.

A total of six non-compliance incidents (1 CPUC/2 Level-0/3 Level-1) were reported during the subject period. One Project Memorandum was issued by the CPUC EM during the subject period (see Tables 4 and 5).

AGENCY REPRESENTATIVES DURING CONSTRUCTION (OTHER THAN CPUC EMS):

None

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 11/15/11)

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.
	11/08/11	Under Review	Yards	Construction of Devers 2 and Indio 2 Construction Yards.
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 11/15/11)

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	10/26/11	11/10/11	Devers Yard	Request for temporary power supply to provide power to construction trailer at the Devers Construction Yard.
	10/25/11	Under Review	Substation	Request to formalize changes to the Red Bluff MMCRP Mitigation Measure BIO-4 and Applicant Measure BIO-5.

Variance Request	Date Requested	Date Issued	Segment #	Description
	10/26/11	Under Review	Substation	Request to formalize clarifications to Mitigation Measure BIO-4 regarding plant salvage performance standards.
	11/10/11	Under Review	Substation	Request for increased well pumping to support civil work, including access road improvements, at Colorado River Substation.
BLM				
BLM #1	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.
BLM #2	10/19/11	10/27/11	Substation	Request to approve 24-hour drilling operations at the CRS site.
	10/27/11	Under Review; draft DNA to BLM	Series Capacitor	Request for a slight expansion of the Series Capacitor site due to engineering conflicts.

TABLE 3
TEMPORARY EXTRA WORKSPACE (TEWS) REQUESTS
(Updated 11/15/11)

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.

NON-COMPLIANCES & INCIDENTS

Table 4 provides a summary of CPUC and SCE reported compliance incidents. A summary of CPUC Non-Compliance Reports and Project Memorandum is provided in Table 5.

**TABLE 4
OTHER COMPLIANCE INCIDENTS**
(Updated 11/15/11)

Description	Type ¹	Date	Location
OTHER COMPLIANCE INCIDENTS			
Approved work areas & pre-construction surveys/sweeps: Entry prior to CPUC approval, entry prior to CPUC EM clearance (appropriate flagging/fencing in place), equipment/materials or parking outside of approved disturbance areas, dirty equipment/materials entering site	CPUC	10/28/11	CRS Dist. Line
	Level 0		
	Level 1	10/24/11	CRS
	Level 2		
	Level 3		
Biological Resource ESA (non-nesting) & Disturbance Areas: ESA buffer encroachment, work with no biological monitor present, work starting prior to daily biological sweep	CPUC		
	Level 0		
	Level 1		
	Level 2		
	Level 3		
Nesting: Buffer encroachment, unauthorized nest removal, inadequate notifications	CPUC		
	Level 0		
	Level 1		
	Level 2		
	Level 3		
Biological Resource Endangerment: Foundation holes not covered @ the end of the day, micro-trash, smoking outside approved areas, improper bird netting installation/gaps in netting, road improvement in tortoise habitat, tortoise gates left open/gaps in fence	CPUC		
	Level 0	10/24/11	CRS
	Level 1		
	Level 2		
	Level 3		
Cultural/Paleontological Resources: Site damage, no monitor present, inadequate notification, unauthorized artifact relocation	CPUC		
	Level 0		
	Level 1		
	Level 2		
	Level 3		
Hydrological Resources: Inadequate BMPs, jurisdictional drainage encroachment, track-out	CPUC		
	Level 0	10/28/11	CRS
	Level 1		
	Level 2		
	Level 3		
Fuel/Hazardous Materials: Spills, no/inadequate secondary containment and labeling, drilling polymer disposed onsite	CPUC		
	Level 0		
	Level 1	10/26/11 10/26/11	CRS CRS
	Level 2		
	Level 3		

Description	Type ¹	Date	Location
Public/Worker Safety: No monitoring at contaminated sites, traffic control not in compliance with TMP, no guard poles in place at roadways	CPUC		
	Level 0		
	Level 1		
	Level 2		
	Level 3		
Air Quality: Fugitive dust, non-CA licensed equipment, dust generation from speeding, soil piles, exceeding idling time	CPUC		
	Level 0		
	Level 1		
	Level 2		
	Level 3		

1. Incident Type Definitions

CPUC: Incident document by CPUC EM.

Level 0: Unanticipated Discovery; documented by SCE Monitors.

Level 1: Minor; documented by SCE Monitors.

Level 2: Moderate; documented by SCE Monitors.

Level 3: Significant; documented by SCE Monitors.

TABLE 5
CPUC NON-COMPLIANCE REPORTS & PROJECT MEMORANDA
(Updated 11/15/11)

Type	Date Issued	Location	Description
CPUC Project Memoranda (PM)			
PM #1	10/28/11	CRS Dist. Line	Construction vehicles leaving marked disturbance limits at two locations along Red Bluff distribution line.

PROJECT PHOTOGRAPHS



Figure 1: Exclusionary fence activities being conducted at Tower #2110. Note avoidance of ESAs marked with orange fencing.



Figure 2: Activities at the Indio Construction Yard included fence installation and gravel placement.



Figure 3: View south along “drive and crush” road created for Red Bluff distribution line.



Figure 4: New pole installation along the Red Bluff distribution line.



Figure 5: Vehicle tracks outside of disturbance limits along the Red Bluff distribution line access route. This incident resulted in the issuance of a Project Memorandum from the CPUC EM.



Figure 6: Area outside of approved Red Bluff disturbance limits which was repeatedly crossed by construction vehicles. The SCE Biological Monitor placed yellow caution tape around perimeter for future avoidance.



Figure 7: Minor oil spill detected by SCE General Monitor along Red Bluff distribution line site. Contaminate soil was shoveled out and removed from site.



Figure 8: Drill rig assembly being conducted at CRS.



Figure 9: Water leaking from Baker tank at CRS site. A hose was attached to tank to resolve any erosion issues.



Figure 10: Area cleared and graded at Red Bluff site to accommodate well drilling activities.