

September 24, 1997

Mr. Bruce Kaneshiro, Project Manager
c/o Environmental Science Associates
225 Bush Street - Suite 1700
San Francisco, California 94104

**SUBJECT: SOUTHERN CALIFORNIA EDISON'S APPLICATION NO.
96-11-046 TO SELL 12 POWER PLANTS INCLUDING ETIWANDA
PLANT IN THE CITY OF RANCHO CUCAMONGA - PROPOSED
MITIGATED NEGATIVE DECLARATION**

Dear Mr. Kaneshiro:

[Begin CRC-1]

Attached are comments made on the Initial Study for the Edison Power Plants including the Etiwanda Power Generating facility in the City of Rancho Cucamonga. Our comments on the Initial Study, as well as comments from every responding jurisdictions, have not been acknowledged or incorporated into the Environmental Assessment/Mitigated Negative Declaration document.

[End CRC-1]

[Begin CRC-2]

From the project description and Initial Study previously reviewed, staff concluded that an Environmental Impact Report should be prepared (see attached response dated July 1, 1997). On such a significant restructuring of power generation ownership in California, how can the response to comments on the Initial Study be entirely ignored. We respectfully suggest that issuance of a Negative Declaration skips an important part of the environmental review process and is, therefore, a premature and inappropriate conclusion at this time.

[End CRC-2]

Thank you for the opportunity to comment on the subject document.

Sincerely,

COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION

L.J. Henderson, AICP
Principal Planner

LJH:MB/JFS

Attachments
cc: Rick Gomez, Community Development Director
Brad Buller, City Planner

The City of Rancho Cucamonga

July 1, 1997

Bruce Kaneshiro and Martha Sullivan
California Public Utilities Commission
c/o Environmental Science Associates
301 Brannan Street, Suite 200
San Francisco, CA 94107

SUBJECT: SOUTHERN CALIFORNIA EDISON'S APPLICATION NO. 96-11-046 TO SELL
12 POWER PLANTS INCLUDING ETIWANDA PLANT IN THE CITY OF RANCHO
CUCAMONGA - ENVIRONMENTAL INITIAL STUDY

Dear Mr. Kaneshiro and Ms. Sullivan:

Thank you for the opportunity to review the draft Initial Study for the subject project. SCE's Etiwanda plant is within the City of Rancho Cucamonga. In general, the draft Initial Study is comprehensive, but we are concerned about cumulative impacts and some minor omissions and incomplete statements of fact. Based on the Environmental Checklist, particularly the discussion of potential cumulative impacts, an Environmental Impact Report should be prepared.

CUMULATIVE IMPACTS. We believe the discussion of cumulative impacts should be substantially expanded and the following issues should be added to the discussion on page 4.16.2:

[Begin CRC-3]

- Demolition As to cumulative impacts, the Initial Study does not address whether some or most of the sold generating plants may be demolished. One report stated that the terms of the sale provided that two of three plants in a "bundle" may be dismantled and relocated to other countries. The study should specify whether or not demolition is permitted. If the sale contract provides for demolition, then the possibility should be addressed in the Study as to adequacy of power generation, replacement generation, and rehabilitation of the site for reuse. The provision for complete toxic cleanup and rehabilitation of a site upon removal of a generating plant is a strong concern of jurisdictions where a plant is located, such as Rancho Cucamonga

[End CRC-3]

[Begin CRC-4]

- Trigger for new plant construction A recent news release stated that four new power generation plants were being considered as a result of deregulation. Under Cumulative Impacts, the Study should address the relationship of the proposed sale as a justification for construction of new power plants. We understand that applications for new plants may not yet have been submitted and that no applications for demolition are pending, but there is a reasonable relationship between the sale and potential demolition and between demolition and new construction.

[End CRC-4]

[Begin CRC-5]

- Relationship to nuclear plants Another aspect of the sale which should be addressed under Cumulative Impacts is the relationship of existing and proposed steam generation and existing nuclear capacity and its economic viability.

[End CRC-5]

MINOR INCOMPLETE FACTS AND OMISSIONS

The following items reference specific facts by page number in the draft Initial Study.

[Begin CRC-6]

- 4.1.2. The Inland Empire area of Southern California is far from rural. The Department of Finance reports that Rancho Cucamonga, for example, had a January 1, 1997, population of 116,045 and the City of San Bernardino 180,306. The populated coastal plain area of Riverside San Bernardino PMSA, which is the service area for the Etiwanda, Highgrove, and San Bernardino plants, contains well over a million people. County wide data from the Department of Finance report for January 1, 1996 is attached.

[End CRC-6]

[Begin CRC-7]

- 4.1.10. The statement is incorrect that the Industrial Area Specific Plan (ISP) and the City of Rancho Cucamonga's Development Code do not define "Extensive Impact Utility Facilities," "Utility Services," and "Petroleum Storage" uses. These terms are defined in the ISP on pages III-16, 17, 18, which are attached.

[End CRC-7]

[Begin CRC-8]

- 4.2.4. The population projection is high compared to the City's Housing Element contained in the Rancho Cucamonga General Plan, revised May 17, 1995, which projects build-out between 2015 and 2020. The population projected is based on current zoning, vacant land, a five percent vacancy rate, and 2.9 persons per household for a buildout range between 153,668 to 162,475 with the most likely population being 158,071. The January 1, 1997, vacancy rate is stated at 7.51 percent with 3.066 persons per household.

[End CRC-8]

[Begin CRC-9]

- 4.3.8 - Table 4.3.1 The City-adopted Red Hill Fault Special Study Zone should be added: Trend Northwest; closest segment is 4.5 miles north, with a maximum credible event magnitude 6.5. See attached General Plan Geotechnical Hazard map, Figure V-4.

[End CRC-9]

[Begin CRC-10]

- 4.3.9 - Table 4.3.2 Recorded earthquakes greater than magnitude 5 near Edison Power Plants: The information in the table ends in 1970 and is very incomplete. The following events should be added: Sylmar (San Fernando) February 9, 1971, magnitude 6.5; Whittier Narrows, October 1, 1987, magnitude 5.9; Upland, February 28, 1990, magnitude 5.5; Sierra Madre, June 28, 1991, magnitude 6.0; Desert Hot Springs, April 22, 1992, magnitude 6.1; Big Bear, June 28, 1992, magnitude 6.6; Landers, June 28, 1992, magnitude 7.5; Northridge, January 17, 1994, magnitude 6.7. The Sylmar, Upland,

and Sierra Madre events were on the San Gabriel Mountain thrust fault, which is a continuation of the Cucamonga Fault, located approximately five miles north of the Etiwanda generating station. See attached article on the Cucamonga fault zone scarps.

[End CRC-10]

[Begin CRC-11A, 11B]

- 4.4.36-38 Ground water resources for Etiwanda generating plant: A waste water treatment plant is under construction adjacent to the Etiwanda Generating Plant. A sewer connection should be considered a mitigation measure as a condition of change of ownership. The relationship of past and future spills and soil contamination as mentioned on page 4.9.3 under hazardous materials should be addressed in relationship to ground water.

[End CRC-11A, 11B]

[Begin CRC-12]

- 4.5.30 "Sensitive Receptors:" The statement that the closest air pollution-sensitive receptors to the Etiwanda generating station are located approximately one mile to the northwest of the site is incomplete. Multi-family residential development exists less than one-half mile directly north, beginning at the northeast corner of Etiwanda Avenue and Arrow Highway. Also a San Bernardino County prison facility is located approximately one mile directly south, at the northwest corner of Etiwanda Avenue and Fourth Street (San Bernardino Road).

[End CRC-12]

[Begin CRC-13]

- 4.7.4 Delhi Sands Habitat: The endangered fly is named for the soil type "Delhi Sand" not "Delphi". The general soil type is present, but not the specific dune type formation of Delhi Sand nor significant stands of the native vegetation association.

[End CRC-13]

[Begin CRC-14]

- 4.9.3 Hazardous material contamination on the Etiwanda site: This item is critical to the local community and discussion should be expanded. A discussion of cleanup in the event of plant demolition should be added.

[End CRC-14]

[Begin CRC-15]

- 4.15.14 Add Rancho Cucamonga Adult Sports Park, located at the northwest corner of Arrow Highway and Rochester Avenue as the facility nearest the Etiwanda generating station, as well as Northeast Park, Heritage Park, Elena Park.

[End CRC-15]

Again, thank you for the opportunity to comment on the draft Initial Study. When completed, please forward a copy of the draft Environmental Impact Report for review and comment. If you have additional questions please contact Miki Bratt, AICP, Associate Planner at (909) 477-2750.

Sincerely,

COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION

/s/

L.J. Henderson, AICP
Principal Planner

LJH:MB:taa

Attachments

cc: Rick Gomez, Community Development Director
Brad Buller, City Planner

**San Bernardino County Population and Housing Estimates
January 1, 1996**

CITY	POPULATION			HOUSING UNITS								PERSONS
	TOTAL	HOUSE-HOLD	GROUP QUARTER	TOTAL	SINGLE		MULTIPLE		MOBILE HOMES	OCCUPIED	% VACANT	PER
					DETACHED	ATTACHED	2 TO 4	5 PLUS				HOUSE-HOLD
ADELANTO	13353	12924	429	5119	3059	307	519	785	449	4571	10.71	2.827
APPLE VALLEY	52834	52649	185	18715	14056	336	2285	1262	776	17498	6.50	3.009
BARSTOW	22297	22147	150	8768	4978	252	1097	1488	953	7884	10.08	2.809
BIG BEAR LAKE	5957	5949	8	8911	7379	218	520	431	363	2353	73.59	2.528
CHINO	63378	55298	8080	17001	11908	920	691	2905	577	16473	3.11	3.357
CHINO HILLS	49763	49615	148	16911	13541	848	279	1680	563	15291	9.58	3.245
COLTON	44509	44154	355	15305	8424	475	1281	4288	837	13956	8.81	3.164
FONTANA	103261	102775	486	32837	23805	678	1647	5907	800	29487	10.20	3.485
GRAND TERRACE	13201	13100	101	4780	2965	184	186	1155	290	4542	4.98	2.884
HESPERIA	59375	59288	87	19838	16059	285	955	1604	935	18914	4.66	3.135
HIGHLAND	40478	40321	157	14008	10021	351	767	2024	845	12620	9.91	3.195
LOMA LINDA	21201	19451	1750	7966	3315	776	1078	2259	538	7353	7.70	2.645
MONTCLAIR	29968	29625	343	9167	5087	810	952	1634	684	8779	4.23	3.375
NEEDLES	5746	5616	130	2497	1420	62	267	277	471	2127	14.82	2.640
ONTARIO	142440	141570	870	44244	25825	3010	4200	8977	2232	41894	5.31	3.379
RANCHO CUCAMONGA	115937	113455	2482	39702	26816	2309	1458	7747	1372	36720	7.51	3.090
REDLANDS	65650	63558	2092	24488	15432	1038	2422	4708	888	23222	5.17	2.737
RIALTO	80312	80238	74	25859	18109	419	2026	3411	1894	23751	8.15	3.378
SAN BERNARDINO	181701	177021	4680	64059	36526	2026	6366	14465	4676	59188	7.60	2.991
TWENTYNINE PALMS	14478	14758	20	6808	4472	128	1433	319	456	5313	21.96	2.778
UPLAND	66230	65699	531	24904	14222	1657	2514	5652	859	23462	5.79	2.800
VICTORVILLE	60009	59523	486	23143	14835	1373	1565	3445	1925	19186	17.10	3.102
YUCAIPA	37450	37131	319	14995	9235	347	567	510	4336	13990	6.70	2.654
YUCCA VALLEY	18632	18305	327	8466	6459	242	595	399	771	7473	11.73	2.449
INCORPORATED	1308460	1284170	24290	458491	297948	19051	35670	77332	28490	416047	9.26	3.087
UNINCOPORATED	281010	269517	11493	130080	100805	3577	4565	5047	16086	86817	33.26	3.104
COUNTY TOTAL	1589470	1553687	35783	588571	398753	22628	40235	82379	44576	502864	14.56	3.090

Definitions:

(From the Industrial Area Specific Plan)

Petroleum Products Storage: Activities typically include, but are not limited to: bulk storage, sale and distribution of gasoline, liquefied petroleum gas, and other petroleum products.

Extensive Impact Utility Facilities: Activities typically include, but are not limited to those performed by public agencies or which are strongly vested in the public interest, and which produce or may produce a substantial impact upon the surrounding area. Uses typically include, but are not limited to the following institutions and installations:

- Electric, gas, and oil transmission facilities
- Garbage or refuse disposal facilities
- Major mail-processing centers
- Radio and television transmission facilities, including but not limited to booster or relay stations
- Railroad and bus terminals
- Railroad rights-of-way, railroad yards and bus storage areas
- Public utility corporation or truck yards
- Reservoirs, water tanks, and water treatment facilities
- Sewage treatment facilities and truck lines exclusive of individual septic tanks
- Steam, fossil, or nuclear power plants
- Truck terminals operated by a public agency

Public Safety and Utility Services: Activities typically include, but are not limited to, the maintenance and operation of the following installations:

- Communications equipment installations and exchanges, except telephone exchange and switching facilities.
- Electrical substations;
- Gas substations;
- Ambulance services;
- Police stations and fire stations;
- Post offices, but excluding major mail-processing centers; and,
- Publicly operated off-street parking lots and garages available to the general public either without charge or on a fee basis.

CRC - THE CITY OF RANCHO CUCAMONGA

CRC-1.

The City indicates its comments to the Draft Initial Study, submitted in its July 1 letter, were not addressed in the Mitigated Negative Declaration/Initial Study. Those comments are addressed individually below as CRC-3 through CRC-15.

Throughout its CEQA review of Edison's divestiture proposal, the CPUC has actively sought and welcomed the input of other affected jurisdictions to inform its environmental analysis. Comments on the Draft Initial Study were requested as a function of informal consultation prior to the completion of the CPUC's analysis. All of the input received was considered by the CPUC in completing the Initial Study and in determining that a Mitigated Negative Declaration was appropriate. Responses were not required nor necessary to accomplish the purpose of the informal consultation, as encouraged in *CEQA Guidelines* § 15063 (g).

CRC-2.

Please see response to CRC-1.

CRC-3.

As noted on page 2.7 of the Initial Study, Edison has revised its proposal such that no generating station is being offered as part of a “bundle” of facilities.

As discussed in Section 3 and Attachment C at page C.16 of the Initial Study, Edison and the new owners have similar incentives to continue operations, refurbish or repower (or implicitly, to retire) any plant, including any associated demolition activities. These incentives arise from market forces that are part of restructuring, not divestiture (see also responses to CCC-1, CCC-2, CCC-3, CRB-13, and CRB-27). For a discussion of remediation activities see CCC-2.

CRC-4.

Potential cumulative impacts were addressed in Section 4.16 of the Initial Study, including the relationship of the project with three current and certified power plant developments, and five plants with applications pending before the California Energy Commission. As noted on page 4.16.6 of the Initial Study, “These potential future power plants, once constructed, are not expected to have cumulative impacts with the project. Demand for electricity in California is not expected to significantly increase. The cumulative effect of new plants (if built) would likely inhibit the tendency of the new owners of divested plants to increase operations at individual

plants because new plants would tend to increase electrical generation capacity in California. The new proposed plants would employ the latest in generating and pollution control technology and may be cleaner to operate so that they would have lower emissions. This would provide a potential positive net benefit to the environment, particularly with respect to air quality. Therefore, the cumulative impacts associated with future potential power plants and the project would be less than significant.” Please also see response CCC-3.

CRC-5.

As noted in CRC-4, cumulative impacts are addressed in Section 4.16 of the Initial Study. It is unclear what, if any, physical impact the commentor is suggesting could arise from “the relationship of existing and proposed steam generation with existing nuclear capacity and its economic viability.”

CRC-6.

As noted on page 4.1.2 of the Initial Study, more than 90 percent of the land in San Bernardino County, where the plant is located, is rural, vacant or recreational open space. The Initial Study notes, however, that though the percentages of land used for housing or commercial/industrial applications are relatively small, the total acreage devoted to such use in San Bernardino County is “greater numerically than comparable acreage in the City of Los Angeles.” In other words, though the percentage of land used for residential, commercial or industrial applications is small, San Bernardino County is so large that the total acreage devoted to such use is still quite significant. Regardless, the exact nature of the lands of the entire county are irrelevant to the project; only the nature of the properties near the power plants proposed for sale are relevant to the project and the Initial Study, and those properties were all considered in the analysis leading to the conclusions of the Initial Study.

CRC-7.

This comment was addressed; the Initial Study was corrected (pg. 4.1.10) and makes no reference to whether such terms are defined in the ISP.

CRC-8.

The Initial Study relied on population statistics supplied by Edison in its *Technical Resources Document, Background Environmental Information for the Proposed Divestiture of Edison Gas-Fired Generation Plants* (ENTRIX, Inc. 1996). That document relied on the 1996 Report from the California Department of Finance's Demographic Research Unit and a 1994 report from the Southern California Associations of Governments giving population statistics (pg. 8-11 of the *Technical Resources Document*). In any event, the differences in the estimates between the two

sources is small, and would not change any conclusion in the Initial Study. For instance, the *Technical Resources Document* provided an estimate of 3.09 persons per household in Rancho Cucamonga, while the City's Plan gives a figure of 3.066 persons per household, a difference of about 0.8 percent.

CRC-9.

The Red Hill Fault is included on page 4.3.6 of the Initial Study in Table 4.3.1, is listed as active, and identifies the closest segment as 5 miles north. However, the following is added to the Geologic Hazards section on page 4.3.14 to note the special study zone around the Red Hill Fault:

The City of Rancho Cucamonga has adopted an earthquake special study zone on the City's General Plan Geotechnical hazard map for the area around the Red Hill Fault. The plant is not within this zone.

Also, column 7 of Table 4.3.1 on page 4.3.6 of the Initial Study is revised such that a Maximum Credible Earthquake of magnitude 6.5 is designated for the Red Hill fault. Neither of these revisions change the Initial Study's conclusions.

CRC-10.

Based on the information provided by the City, the following recorded earthquakes are added to Table 4.3.2 under the Etiwanda Plant. The distances to the epicenter are approximate.

Date	Richter Scale Magnitude	Epicenter from Station	Location
<u>2/9/71</u>	<u>6.5</u>	<u>37 mi. NW</u>	<u>San Fernando</u>
<u>10/1/87</u>	<u>5.9</u>	<u>20 mi. SW</u>	<u>Whittier</u>
<u>2/28/90</u>	<u>5.5</u>	<u>less than 4 mi. W</u>	<u>Upland</u>
<u>6/28/91</u>	<u>6.0</u>	<u>20 mi. NW</u>	<u>Sierra Madre</u>
<u>4/22/92</u>	<u>6.1</u>	<u>61 mi. SE</u>	<u>Desert Hot Springs</u>
<u>6/28/92</u>	<u>6.6</u>	<u>44 mi. NE</u>	<u>Big Bear</u>

<u>6/28/92</u>	<u>7.5</u>	<u>68 mi. NE</u>	<u>Landers</u>
<u>1/17/94</u>	<u>6.7</u>	<u>55 mi. NW</u>	<u>Northridge</u>

The addition of this information does not change the conclusions of the Initial Study.

CRC-11A.

As noted on page 4.4.37 of the Initial Study, the plant now discharges wastewater to the Los Angeles County Sanitation District via the Chino Basin Municipal Water District (CBMWD), under a temporary permit issued by CBMWD in 1991. By law, any new owner of the plant would be required to obtain a new permit from CBMWD for continued wastewater discharge, thus ensuring compliance with all applicable rules, regulations and operating criteria. The City did not identify an environmental impact that its recommended mitigation measure would mitigate. Since there is no environmental impact associated with the project that such a measure would mitigate, there is no basis for or need to require Edison or the new owner to construct a sewer connection to the new wastewater treatment facility.

CRC-11B.

As discussed in response to CCC-2, a condition of the sale of the plants targeted for divestiture, Edison will retain responsibility for remediation of all existing soil contamination, including that which may affect groundwater. The new owner will assume responsibility for remediation of soil contamination that occurs after the sale.

CRC-12.

The second sentence of the last paragraph of the Etiwanda section of Permit Conditions and Current Emissions, on page 4.5.26 of the Initial Study, is revised as follows:

The closest air pollution-sensitive receptors to the generating station are located approximately one mile to the northwest of the site. ~~half mile directly north of the~~ generating facility in multi-family residential development near the intersection of Etiwanda Avenue and Arrow Highway. Other receptors are located approximately one mile to the northwest of the site, and at a San Bernardino County Jail facility approximately one mile south of the generating facility at the intersection of Etiwanda Avenue and Fourth Street (San Bernardino Road).

However, identifying sensitive receptors that are one-half mile from the plant makes no difference in the conclusions drawn concerning air quality. For other Edison plants proposed for divestiture, many receptors are located “in close proximity (1,000 feet or less) of seven of the 12 power plants,” as noted on page 4.5.39 of the Initial Study under “Local Issues.” Previous health risk assessments of receptors near PG&E plants concluded that increased emissions of hazardous air pollutants (HAPs) from gas-fired boilers did not correlate to increased risk to nearby sensitive receptors. In any event, new owners of divested plants would still be required to comply with the Air Toxics “Hot Spots” Information and Assessment Act, including notification of exposed individuals if the assessments identify “significant health risk.”

CRC-13.

Concerning the commentor's first point, the last sentence of the Etiwanda description under the “Local Setting” section on page 4.7.4 of the Initial Study is revised as follows:

However, the plant is within a critical habitat area for Delhi ~~Delphi~~ sand-flower-loving fly (federally endangered) and the residual open space could harbor several special status species such as the burrowing owl, orange-throated whiptail, the San Bernardino Merriam's kangaroo rat and the San Diego horned lizard.

The City's second point appears to state that although Delhi Sand is present at or near the Etiwanda site, the specific dune types and associated native vegetation are not present at the site; this observation does not change or affect any analysis or conclusion drawn in the Initial Study.

CRC-14.

This comment was addressed in the Initial Study. The Etiwanda description under Local Settings in the Hazards Section, found on page 4.9.3 of the Initial Study, included substantially more information than the description in the DIS, and cleanup procedures are discussed at length in the Exposure to Existing Hazards section on page 4.9.12 of the Initial Study.

CRC-15.

This concern was addressed, as all four of the parks are included in the list found on page 4.15.14 of the Initial Study.