

November 30, 2015

Jensen Uchida
Project Manager
Energy Division, CEQA Unit
State of California
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: Response to September 23, 2015 Information Request;
CPUC Application No. A.15-04-013

Dear Mr. Uchida:

Thank you for your correspondence of September 23, 2015, requesting additional information in connection with the California Public Utilities Commission's ("CPUC") Energy Division's efforts towards preparing a subsequent environmental impact report ("SEIR") for Southern California Edison's ("SCE") Riverside Transmission and Reliability Project ("RTRP"). The owners of the Vernola Marketplace Apartments Community ("VMAC") appreciate the CPUC's efforts to refine the current baseline condition for its SEIR, and applaud its efforts to assess impacts to not only properties within the RTRP corridor, but also the entitlements which they have earned.

Our responses to the CPUC's information request track the numbers of the requests themselves, which for your convenience are repeated below:

- 1. A brief description of the use of each building along with the number of apartment units that would be lost if these buildings were removed.**

The development entitlements obtained from the City of Jurupa Valley for the VMAC property¹ allow for the construction of 397 Class A apartments dwellings. The entitlements were approved by the City of Jurupa Valley on March 19, 2015, and consist of City Council Resolution No. 2015-15, which approved General Plan Amendment No. 1404, Specific Plan Amendment No. 1401, and Site Development Permit No. 3416. In addition, City Council adopted Ordinance No. 2015-05, amending the Riverside County Zoning Map No. 15 (Jurupa

¹ These consist of Riverside County Assessor Parcel Nos. 152-020-012; 152-020-021; and 152-020-022, with a collective size of 17.38 gross acres.

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Area Plan). A site plan of the approved development, along with a rendering with landscaping, is attached hereto as **Exhibit A**. SCE has apparently provided a conceptual drawing showing its understanding of how the proposed RTRP corridor would impact the development, which was included with your September 23, 2015 data request. (For your convenience, a copy is attached as **Exhibit B**.)

The fallacy underlying SCE's exhibit, and the challenge VMAC faces in responding to it, is SCE's notion that the RTRP proposed right of way will impact only those areas of the VMAC project falling directly within the to-be-acquired right of way. In reality, nothing could be further from the truth, in part because the specifics of both the dimensions and property easement rights that will be encompassed in that right of way are not defined. No matter how any final overhead line layout is developed, however, the RTRP cannot help but affect drainage and other facilities that are fundamental, core features of both the physical functionality and market positioning of the entire VMAC project.

As such, the true answer to the issue underlying all three of the specific requests you make, i.e., "What portion of the VMAC project is lost if SCE and RPU go through with the RTRP project as presently proposed?" is this: All of it.

To answer the CPUC's specific question, the present RTRP proposed alignment directly conflicts with portions of eight different buildings on the site. These buildings are depicted on **Exhibit "C"** hereto, and their unit counts are summarized below:

BUILDING	TOTAL UNITS	2 BR UNITS	3 BR UNITS
1	25	22	3
3	30	-	30
5	30	30	-
7	9	9	-
8	6	6	-
22	20	17	3
23	10	10	-
24	25	22	3
25	10	10	-
TOTAL	165	126	39

Clubhouse: No units per se, but loss of swimming pool, recreational amenities, community clubhouse and meeting rooms, community center, and other recreational amenities.

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As can be seen, the RTRP alignment directly displaces at a minimum 165 total apartment residential units, along with the “heart and nerve center” of the common area--the community club house, leasing and administrative center, and its shared amenity facilities. These amenities were particularly important, both to the developer and to the City of Jurupa Valley, in elevating the target demographic market segment for a higher-end, Class A apartment living community. In addition, the RTRP alignment as depicted on the SCE exhibit presently displaces at least 118 parking spaces.

However, the direct unit count and amenity loss taken alone presents only a fraction of the RTRP’s true impacts to the VMAC project, for a number of reasons. First, nothing in the RTRP environmental reporting to date has dealt with, or even identified, the impact that the right of way acquisition will have upon access from the VMAC property to the regional storm drain facility located at the westerly edge of the site. This facility, known as Line J, is owned and operated by the Riverside County Flood Control and Water Conservation District (“County Flood”). This storm drain line lies within a 38’-40’ easement traversing the VMAC property and the properties immediately to the North, and there is a slope protection easement immediately adjacent to that. As depicted in **Exhibit D** hereto², the proposed RTRP alignment (as presently configured) overlies the Line J easement.

The VMAC project directly connects to Line J for its drainage. If Line J access is no longer available, the VMAC project’s grade and topography constraints would require a pump station to take the flow from the natural and engineered drainage pattern (which is southwesterly) up to the higher grade of the existing public right of way, at 68th Street. Such a drainage solution would be prohibitively expensive.

That is exactly what the VMAC owners and developers face, however, because SCE’s standard provisions for its transmission line rights of way *prohibit* the necessary crossing and drainage structures essential to VMAC’s access to Line J, and indeed, its entire development. SCE’s “Transmission Line Right of Way Constraints and Guidelines” (attached hereto as **Exhibit E**)³ prohibit permanent structures, including pipelines. (See, Constraints and Guidelines, No. 2.) After SCE condemns its easement, therefore, VMAC will be prohibited from installing its drainage pipelines crossing the RTRP right of way to access Line J, which is the critical drainage facility serving the entire development.

² Page 1 of **Exhibit D** sets out the storm drain and slope easements, and how they relate to the RTRP proposed alignment. Page 2 shows the impacts if the RTRP proponents have to avoid these easements, and the RTRP alignment moves further into the VMAC property as a result.

³ These are dated February 2, 2012. They can be found on SCE’s website at: https://www.sce.com/wps/wcm/connect/2bca123a-c5b3-4035-8625-7f187c908d86/ConstraintsandGuidelines_AA.pdf?MOD=AJPERES, or by searching “Constraints and Guidelines.”

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This presupposes, of course, that SCE and RPU are able to work out the underlying incompatibility between SCE's policies for transmission right of way and the pre-existing Line J facility – a presently undocumented leap of faith VMAC believes merits substantive discussion in the SEIR. Indeed, ownership conflicts of the very type posed by the pre-existence of flood control facilities like Line J have already been cited by the project proponents as a reason for rejecting alternative alignments. (*See*, SCE; Siting Report dated July, 2015, sec.4.2.2; *see also* RTRP Siting Study dated August 31, 2006 [listing "Planned Residential" land uses as "High Avoidance" areas.] Excerpts of both documents are attached with **Exhibit F**.)

Second, a substantial portion of the southwest portion of the VMAC 397 unit apartment complex consists of a below-ground, on-site Stormwater Pollution Prevention Plan ("SWPPP") basin. This facility measures some 320 feet by 120 feet, and was necessitated by regional stormwater permit requirements. The entire VMAC site drains to this facility, prior to emptying into Line J. This underground water quality facility would not be permitted to coexist with the RTRP alignment (*see*, **Exhibit E**, SCE's Right of Way Constraints and Guidelines, No. 2, which prohibits "vaults" and "detention basins;" *see also*, No. 11, prohibiting groundwater and storm water infiltration.) As such, the entire drainage plan for the project would have to be re-conceptualized, redesigned, re-engineered, and vetted to pass muster with developers, lenders, insurance companies, County Flood, and Jurupa Valley.

Even if SCE were to depart from its Right of Way Constraints and Guidelines, and allow the underground detention facility, maintenance or access to such facility would be severely restricted, and subject to SCE approvals. SCE's right of way policies are clear; access to and maintenance of its own facilities in its rights of way take priority over any conflicting uses. The added layer of administrative headache and delay that will attend having to secure SCE approval for even routine maintenance of the SWPPP facility, and risk that such maintenance would almost certainly entail increased costs, uncertain scheduling, and added assumption of liability for damage to SCE facilities, sharply increases the operational and financial risks of the VMAC development.

SCE's failure to even mention, let alone reconcile, these drainage conflicts continues a maddening tendency of the RTRP project proponents to ignore or gloss over the true impacts the project visits on the owners of the land they would condemn to build it. Drainage isn't the last of it, however. Changes to drainage would also have consequential impacts on site grading, street, and parking layout. It would require shifts in building design, location, and orientation, and a whole host of other engineering and agency approval complications, all of which necessarily arise from disruption to the fundamental drainage pattern that was the foundational physical control point of the approved site plan. In short, RTRP's drainage impacts *alone* take VMAC and its owners "back to the drawing board" on project design, quite literally from the ground up.

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The loss of the approved internal streets to the RTRP right of way will also require a complete reworking of the VMAC vehicle circulation design, since building layouts and parking fields will have to be redone. This will not only require redesign of private streets to meet City of Jurupa Valley criteria, but will require redesign of parking plans so as to keep available parking fields reasonably close to the apartment units they serve. It will also require resubmittal of the reworked on-site circulation plan to the applicable fire authority, to make sure fire access and turnaround clearances are preserved. This reworked access plan will also have to take into account SCE's demand that it have 24/7 access to its facilities and right of way, which will undermine the private, gated nature of the community. (See, **Exhibit E**, Constraints and Guidelines, No. 5.)

These are but a few of the conflicts between RTRP and the VMAC. VMAC has had an engineering analysis done examining these and other issues that arise if RTRP is imposed on the VMAC site, the results of which are summarized in **Exhibit G**.

The impacts are not just physical and engineering ones. The drop in the number of units, the loss of amenities characteristic of higher-end apartment residential communities, and the impacts from the large overhead wires proposed by the RTRP being immediately adjacent to the site, create significant detriment to the VMAC market position and appeal. This is no small matter; the RTRP calls into sharp question the continuing viability of the Vernola Marketplace Apartments project as presently conceived.

Attached hereto as **Exhibit H** is a letter from the Western National Group, a party with whom VMAC has been negotiating for joint development of the site for over three years. As Western National's letter indicates, the combination of the physical and marketplace impacts that would result from construction of the RTRP as presently proposed will result in the loss of a development partner⁴. Given Western National's scope and expertise in this market segment, VMAC has every reason to suspect that other sophisticated market players would react similarly. The unfortunate result is, and has been, inhibition of the owners' ability to reach a successful agreement for development of the property. Development of the RTRP as presently proposed therefore threatens the existing entitlements in their entirety.

2. **A conceptual site development layout depicting how the Vernola Marketplace Apartments site would be configured if the RTRP project were built as depicted by SCE. Please include a summary of units lost or gained in relationship to the original Vernola design. This is necessary because the reduction in buildings and apartment units associated with the revised site**

⁴ WNG concludes that the three buildings left on the westerly portion of the main north-south access road for the project (Buildings Nos. 2, 4 and 6) are not rentable. The conflicts with the present site plan are demonstrated in **Exhibit I**. Loss of these three buildings subtracts another 50 units, bringing the total lost to 215.

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design would likely not be identical to that depicted in the SCE conflict map for the current design.

This data request cuts to the heart of the VMAC owners' current struggles with the RTRP's proposed alignment, and the pendency of the RTRP project generally. There is little question that any revised site plan "would likely not be identical" to that depicted in SCE's conflict map. Respectfully, however, it is currently impossible for the VMAC owners to provide any kind of conceptual site development layout depicting how it might be configured otherwise. Any such "substitute" development proposal would require hundreds of thousands of dollars of consultant and engineering analyses, and even then would be an exercise in speculation. No viable replacement plan can be formulated unless and until the RTRP project is completely designed, clarifying the current dizzying number of variables that RTRP foists upon the remainder property's utility and developability.

These variables include exactly where the right of way alignment will be, how wide it is, what types of towers and lines will be placed where, what fall zone protections will be required, what property rights SCE proposes to acquire within the right of way and what rights it will leave to the underlying owner, what processes the underlying owner will have to endure to exercise those reserved rights, how the RTRP will affect existing grade and infrastructure, and what rights SCE will acquire over the remaining property to access its facilities within the right of way, to name only a few. As persons who neither asked for nor particularly care for the RTRP facility on their property, the VMAC owners are understandably unenthusiastic to undertake all the engineering work required to chase their own tails on redesign of their currently approved site plan. Instead, they believe it more appropriate to look to SCE and RPU to be more specific on their own project, and the burdens they propose to create.

3. Details on the current construction and buildout schedule for the Vernola Marketplace Apartments project.

Since the City of Jurupa Valley approved their project, the VMAC owners have been proceeding with implementing their development. They have conducted negotiations with Western National Group, as identified above, and have initiated a series of inquiries with a host of financing institutions in order to secure construction financing to allow the project to go forward. The property owners have fielded a number of inquiries from both interested developers and perspective purchasers, who appear anxious to capitalize on present favorable real estate market conditions for the type of luxury high-density apartment community the City's development entitlements contemplate.

Unfortunately, the owners are battling RTRP-generated impediments to these efforts. Both Southern California Edison and City of Riverside have initiated litigation against the City of Jurupa Valley, also naming the VMAC owners, challenging the CEQA approval by the City

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for the site's development entitlements. *City of Riverside v. City of Jurupa Valley*, Riverside County Case No. RIC1504611, was filed on April 17, 2015. *Southern California Edison v. City of Jurupa Valley, et al.*, San Bernardino Superior Court Case No. CIVDS1513522, was filed on the same day. Together, these actions seeks invalidation of the VMAC's development approvals, based specifically on an alleged failure to adequately analyze the Vernola Marketplace Apartments project on the pending RTRP.⁵

Given the uncertainties of the pendency of the RTRP on the project site generally, and the two existing CEQA actions pending against project entitlements, the CPUC can appreciate that the project developers now face providing disclosures that are an anathema to successful negotiations for development partners, construction financing, and ultimate construction of the project. The VMAC owners are hopeful the RTRP contingencies will soon be resolved, including because SCE and RPU's baseless litigation will be decided by the Superior Court this spring and is expected to be tossed out. And thus, despite facing inappropriate risks SCE and RPU are creating, the VMAC owners are proceeding with their development efforts.

Toward these efforts, the VMAC owners are preparing grading permit submittals to begin site preparation efforts, with the goal of expediting downstream development processes. VMAC estimates approximately four to six months will be required to finalize and permit grading plans, and another six months would be required for actual grading. Concurrently, VMAC estimates approximately twelve months for finalizing the architectural and engineering required to proceed to construction-ready plans and permits. Again assuming no impediments from RTRP, VMAC estimates construction financing and actual construction would be completed nine months thereafter. This means the project would be delivered in Summer 2017.

Conclusion.

The VMAC owners share the CPUC's frustration with the inability to offer specific answers to what options remain for them, their entitlements, and their property in the wake of the costs, uncertainties, and market impediments generated by the pendency of the RTRP. The VMAC owners are diligently proceeding with their development as circumstances permit, and look forward to the time when the alleged benefits RTRP may bring to the electrical users of the City of Riverside no longer impede the housing needs of the City of Jurupa Valley, and the VMAC project's attempt to meet them.

⁵ The very decision of the CPUC requiring SEIR on the RTRP would seem to negate this core allegation in both CEQA challenges. If the RTRP design and environmental review is not yet complete, it can hardly be said that there is sufficient specificity on RTRP project design, or even on whether it will go forward at all, upon which to base a successful CEQA challenge. Despite this anomaly, both City of Riverside and SCE have refused VMAC's request to dismiss these pending CEQA actions. That position betrays concern for RTRP project processing timelines, far more than any concern for the environment.

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We appreciate the opportunity to provide what information we can, and to explain our position on RTRP's impacts. If there are further questions or items of information that would assist the CPUC in defining the baseline for its SEIR work, we invite you to contact us. We also would be pleased to make ourselves available to meet with you when you are in the area.

RUTAN & TUCKER, LLP



David B. Cosgrove

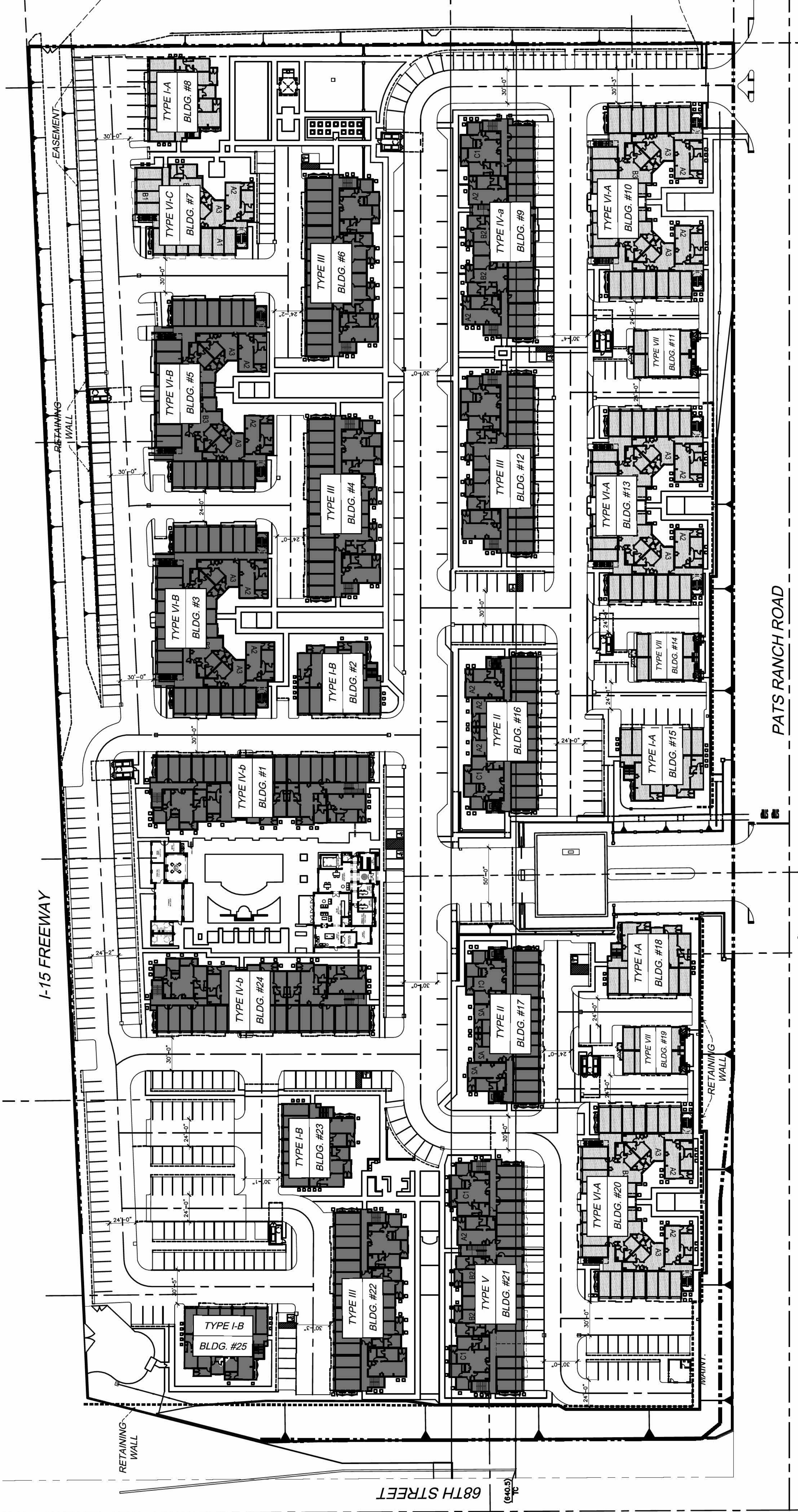
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Enclosures:

- Exhibit A – Approved VMAC site plan
- Exhibit B – SCE RTRP/VMAC overlay
- Exhibit C – VMAC Site Plan with RTRP Right of Way
- Exhibit D – Line J diagram
- Exhibit E – SCE Right of Way Constraints and Guidelines
- Exhibit F – Excerpts, SCE Siting Report and RTRP Siting Report
- Exhibit G – Webb Engineering analysis of RTRP/VMAC conflict
- Exhibit H – Letter from Western National Group
- Exhibit I – Rendering of RTRP Conflict with VMAC Project

EXHIBIT A

EXHIBIT A



BUILDING/UNIT MIX

BLDG. DEST.	TYPE	QTY	STORIES	2 BDRM				3 BDRM				TOTAL UNIT	TOTAL ATTACHED GARAGE
				A1	A2	A3	A4	B1	B2	B3	B4	C1	
1	IV-b	1	3	4	6	0	0	6	6	0	0	3	25
2	I-b	1	3	2	3	0	0	2	3	0	0	0	10
3	VI-b	1	3	4	6	6	3	8	0	3	0	0	30
4	III	1	3	2	3	0	0	6	6	0	0	3	20
5	VI-b	1	3	4	6	6	3	8	0	3	0	0	30
6	III	1	3	2	3	0	0	6	6	0	0	3	20
7	VI-C	1	2	1	2	2	0	2	0	2	0	0	9
8	I-a	1	2	1	2	0	0	1	2	0	0	0	6
9	IV-a	1	3	4	6	0	0	6	6	0	0	3	25
10	VI-a	1	2	2	4	4	0	4	0	4	0	0	18
11	VII	1	2	0	0	0	0	0	0	0	2	0	2
12	III	1	3	2	3	0	0	6	6	0	0	3	20
13	VI-a	1	2	2	4	4	0	4	0	4	0	0	18
14	VII	1	2	0	0	0	0	0	0	0	2	0	2
15	I-a	1	2	1	2	0	0	1	2	0	0	0	6
16	II	1	3	6	9	0	0	2	0	0	0	3	20
17	II	1	3	6	9	0	0	2	0	0	0	3	20
18	I-a	1	3	1	2	0	0	2	0	0	0	0	6
19	VI-a	1	2	0	0	0	0	0	0	0	0	0	3
20	VI-a	1	2	3	4	4	0	4	0	4	0	0	18
21	VI	1	3	2	3	0	0	8	6	0	0	6	25
22	III	1	3	2	3	0	0	6	6	0	0	3	20
23	I-b	1	3	2	3	0	0	2	3	0	0	0	10
24	IV-b	1	3	4	6	0	0	6	6	0	0	3	25
25	I-b	1	3	2	3	0	0	2	3	0	0	0	10
LEASING/ CLUBHOUSE	-	1	1	-	-	-	-	-	-	-	-	-	-
CABANA	-	1	1	-	-	-	-	-	-	-	-	-	-
SUB-TOTAL	-	-	-	58	92	26	6	93	63	20	6	33	397
TOTALS	-	27	67	182	45.8%				45.8%				100%
%	-	-	-	-	-	-	-	-	-	-	-	-	-

BUILDING SQUARE FOOTAGES

BLDG. DEST.	TYPE	QTY	1st FL SQ. FT.	2nd FL SQ. FT.	3rd FL SQ. FT.	TOTALS SQ. FT.
1	IV-b	1	11,820	12,095	12,095	36,010
2	I-b	1	4,449	4,486	4,486	13,421
3	VI-b	1	14,211	14,188	14,188	42,587
4	III	1	9,858	9,910	9,910	29,677
5	VI-b	1	14,211	14,188	14,188	42,587
6	III	1	9,858	9,910	9,910	29,677
7	VI-C	1	7,015	7,035	-	14,050
8	I-a	1	4,449	4,486	-	8,935
9	IV-a	1	11,891	12,007	12,007	35,904
10	VI-a	1	13,474	13,242	-	26,716
11	VII	1	2,450	2,493	-	4,943
12	III	1	9,858	9,910	9,910	29,677
13	VI-a	1	13,474	13,242	-	26,716
14	VII	1	2,450	2,493	-	4,943
15	I-a	1	4,449	4,486	-	8,935
16	II	1	8,553	8,590	8,590	25,739
17	II	1	8,553	8,590	8,590	25,739
18	I-a	1	4,449	4,486	-	8,935
19	VII	1	2,450	2,493	-	4,943
20	VI-a	1	13,474	13,242	-	26,716
21	VI	1	16,682	13,242	13,242	43,166
22	III	1	9,858	9,910	9,910	29,677
23	I-b	1	4,449	4,486	4,486	13,421
24	IV-b	1	11,820	12,095	12,095	36,010
25	I-b	1	4,449	4,486	4,486	13,421
LEASING/ CLUBHOUSE	-	1	4,504	-	-	4,504
MAINT. CABANA	-	1	416	-	-	416
TOTALS	-	28	2,562	-	-	2,562

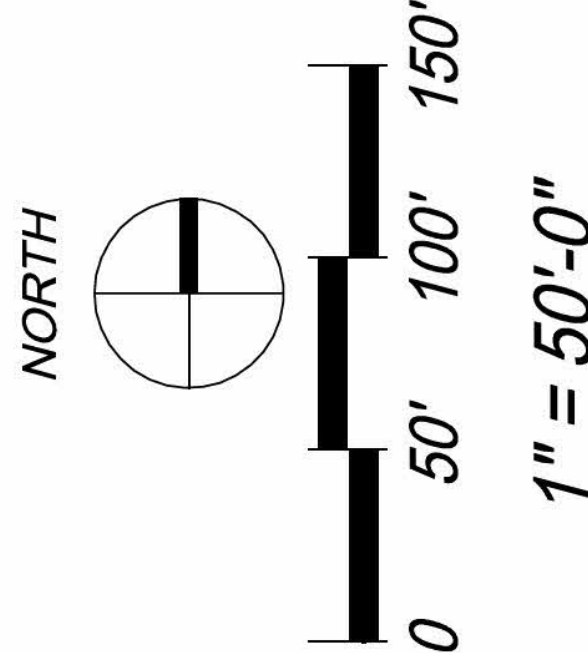
PARKING SUMMARY
TOTAL REQUIRED

UNIT TYPES	UNITS	RATIO	QTY.
1 BDRM UNITS	182	1.25	228
2 BDRM UNITS	92	2.25	410
3 BDRM UNITS	33	2.75	81
TOTAL UNITS	397		729
TOTAL REQUIRED PARKING			184
1 COVERED XDU			397

PARKING SUMMARY
TOTAL PROVIDED

TOTAL PARKING PROVIDED	%	QTY.
TOTAL GARAGE	46%	346
TOTAL STALLS STANDARD	24%	174
TOTAL STALLS COMPACT	10%	72
CARPORTS PARALLEL	6%	45
TOTAL PROVIDED PARKING	100%	729
APRON		77
TOTAL PROVIDED PARKING		806
		2

SITE LEGEND			
	1 STORY		
	TYPE II - 2 STORY		
	TYPE I - 3 STORY		



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2013-183 DECEMBER 18, 2014



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VERNOLA MARKETPLACE APARTMENT COMMUNITY JURUPA VALLEY, CA

ARCHITECTS ORANGE
144 NORTH ORANGE ST., ORANGE, CALIFORNIA 92666 (714) 639-9860



AMENITY LEGEND

- ① Entry Motor Court:
- Vehicular Gates
- Decorative Paving
- Directory

② Central Pool Area:
- 30' x 70' lap pool with free play area to the side
- Large sun deck
- Private cabanas

③ Entertainment Courtyard:
- Outdoor kitchen
- Lounge type furniture
- Bar countertop with decorative strip lights above

④ Outdoor Room with Central Fireplace

⑤ Mailbox Courtyard

⑥ Pedestrian Promenade:
- Lushly landscaped and shaded parkways providing pedestrian linkage to community's major amenities and landscaped courtyards thereby connecting the "string of pearls" together.

⑦ Village Green:
- 50 x 60 open play turf area
- Community garden
- Picnic shade structure w/BBQ
- Large tot lot

⑧ Semi-Private courtyard:
- Lushly landscape
- BBQ and/or seating nodes provided

⑨ Secondary Gated Entry with Decorative Paving

⑩ Outdoor Lounge:
- Decorative patio partially enclosed with low walls
- Covered kitchen with bar counter seating under shade structure
- Fire pit

⑪ Green Paseo:
- Open turf play area acts as an extension of the pedestrian promenade
- Young children climbing sculpture/toys located in center

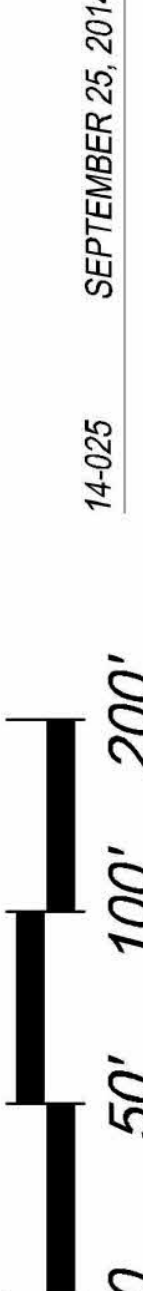
⑫ Dog Park:
- Enclosed area
- Dog washing station

⑬ 5' Wide Decomposed Granite Easement Access Drive

⑭ Fire Tree Urban Forest For Screen From Freeway

⑮ Existing Berm Along Freeway Frontage

⑯ 33' Wide Flood Control Eastern

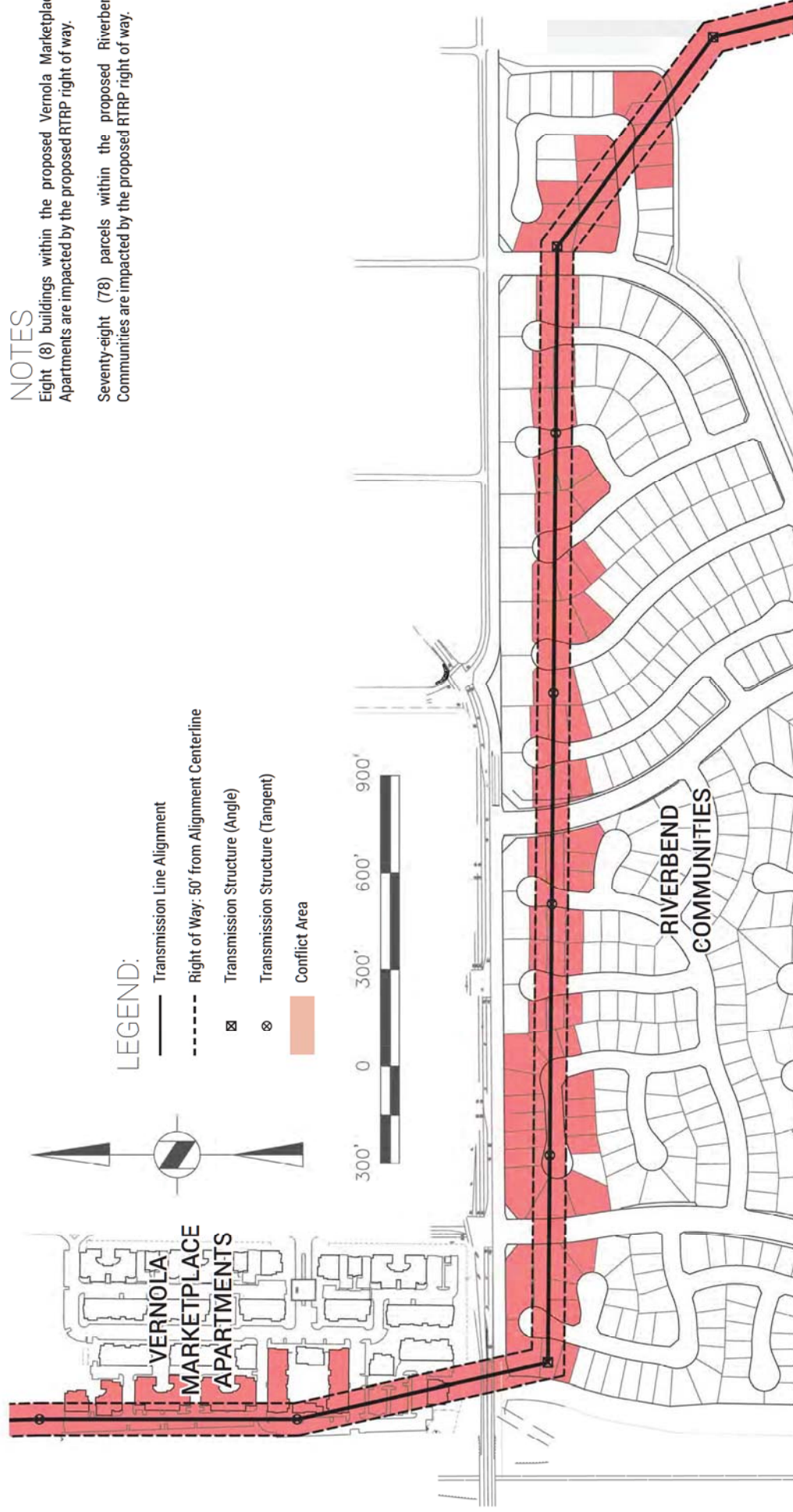


VERNOLA MARKETPLACE APARTMENT COMMUNITY JURUPA VALLEY, CA

EXHIBIT B

EXHIBIT B

VERNOLA MARKETPLACE APARTMENTS AND RIVERBEND COMMUNITIES CONFLICT AREAS



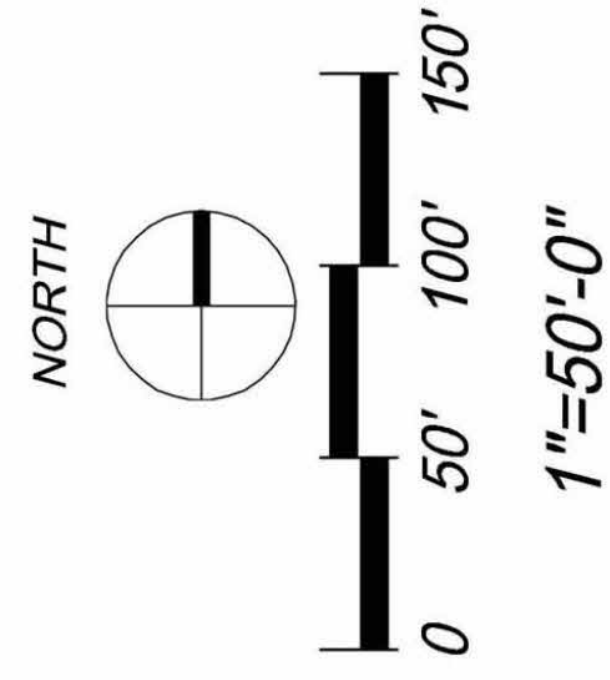
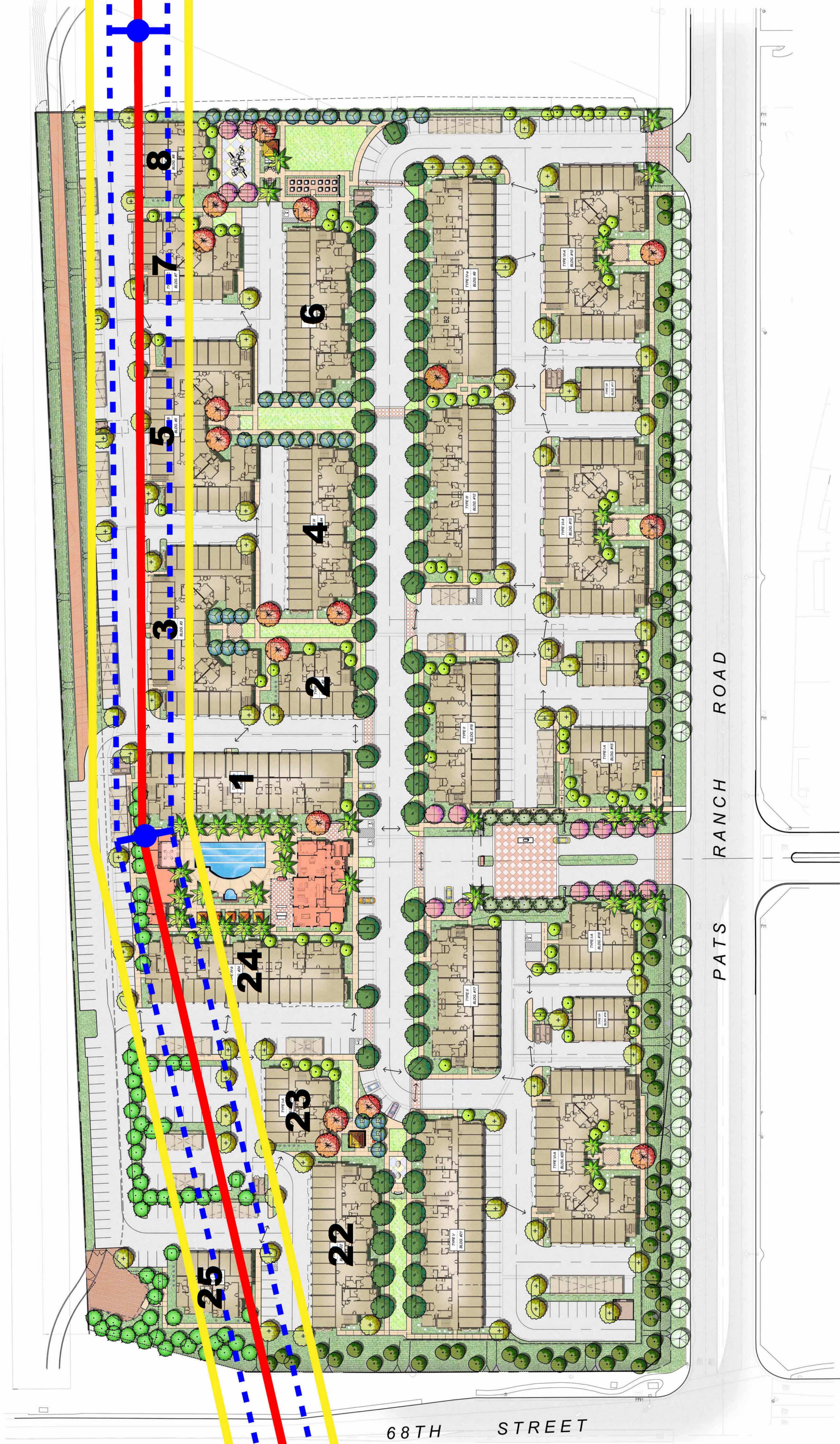
NOTES

Eight (8) buildings within the proposed Vernola Marketplace Apartments are impacted by the proposed RTRP right of way.

Seventy-eight (78) parcels within the proposed Riverbend Communities are impacted by the proposed RTRP right of way.

EXHIBIT C

EXHIBIT C



VERNOLA MARKETPLACE APARTMENT COMMUNITY | 397 Units

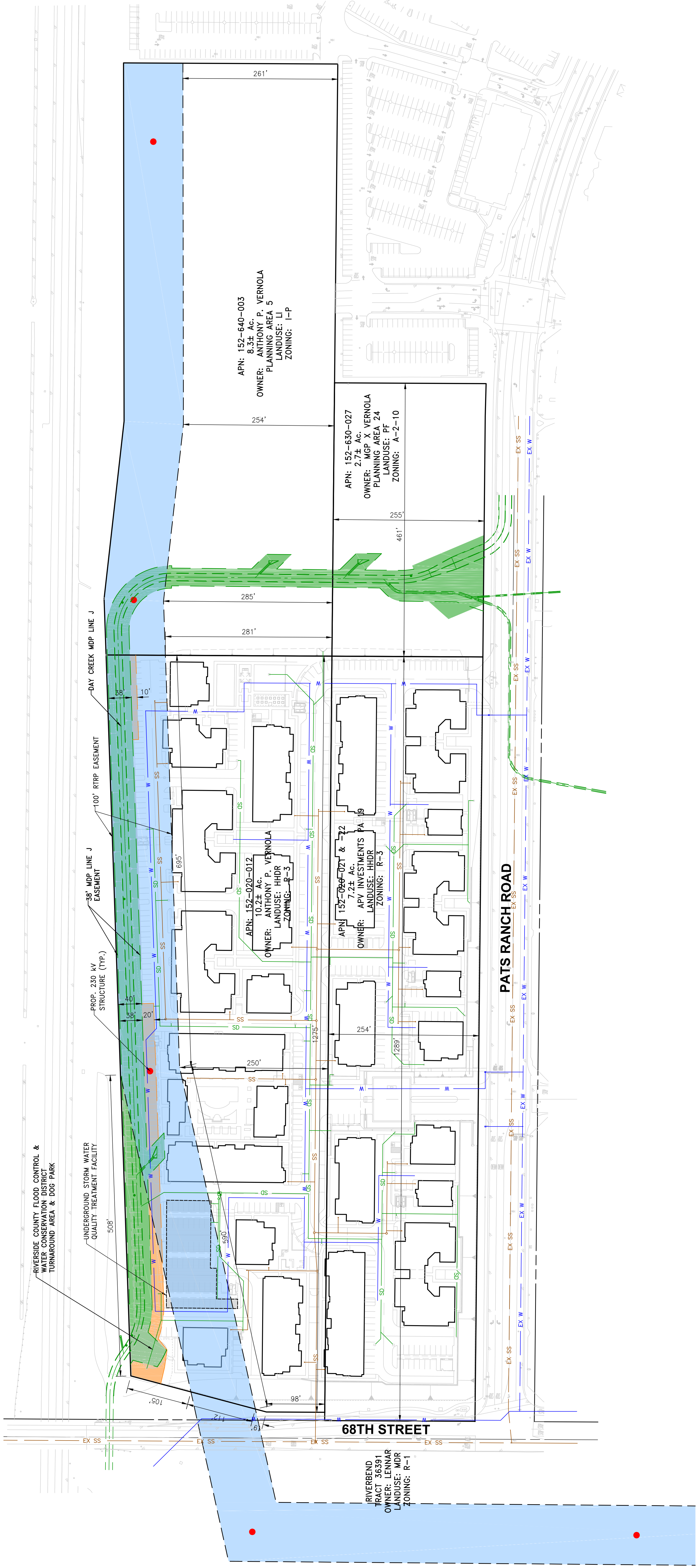
RIVERBEND
TTM 36391 | 466 Units

EXHIBIT D

EXHIBIT D

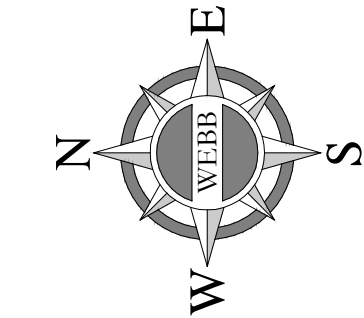
VERNOLA MARKETPLACE APARTMENT COMMUNITY

RTRP 100' EASEMENT OVERLAY WITH THE DAY CREEK MDP LINE J EASEMENT



- LEGEND:**
- PROPOSED RTRP 100' EASEMENT
 - PROPOSED RTRP POLE
 - EXISTING RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT EASEMENT FOR FLOOD CONTROL AND DRAINAGE PURPOSES REC. 1/24/12 AS INST. # 2012-0030001
 - EXISTING RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT EASEMENT FOR SLOPE PROTECTION PURPOSES REC. 1/24/12 AS INST. #'S 2012-0030002, 2012-0030003, & 2012-0030004
 - PROPOSED STORM DRAIN
 - PROPOSED WATERLINE
 - PROPOSED SEWER LINE
 - EXISTING WATERLINE
 - EXISTING SEWER LINE
 - EXISTING STORM DRAIN

NOTE:
DIMENSIONS & LOCATIONS SHOWN ARE APPROXIMATE ONLY. ACTUAL DIMENSIONS & LOCATIONS MAY DIFFER BASED ON FINAL RTRP ALIGNMENT.



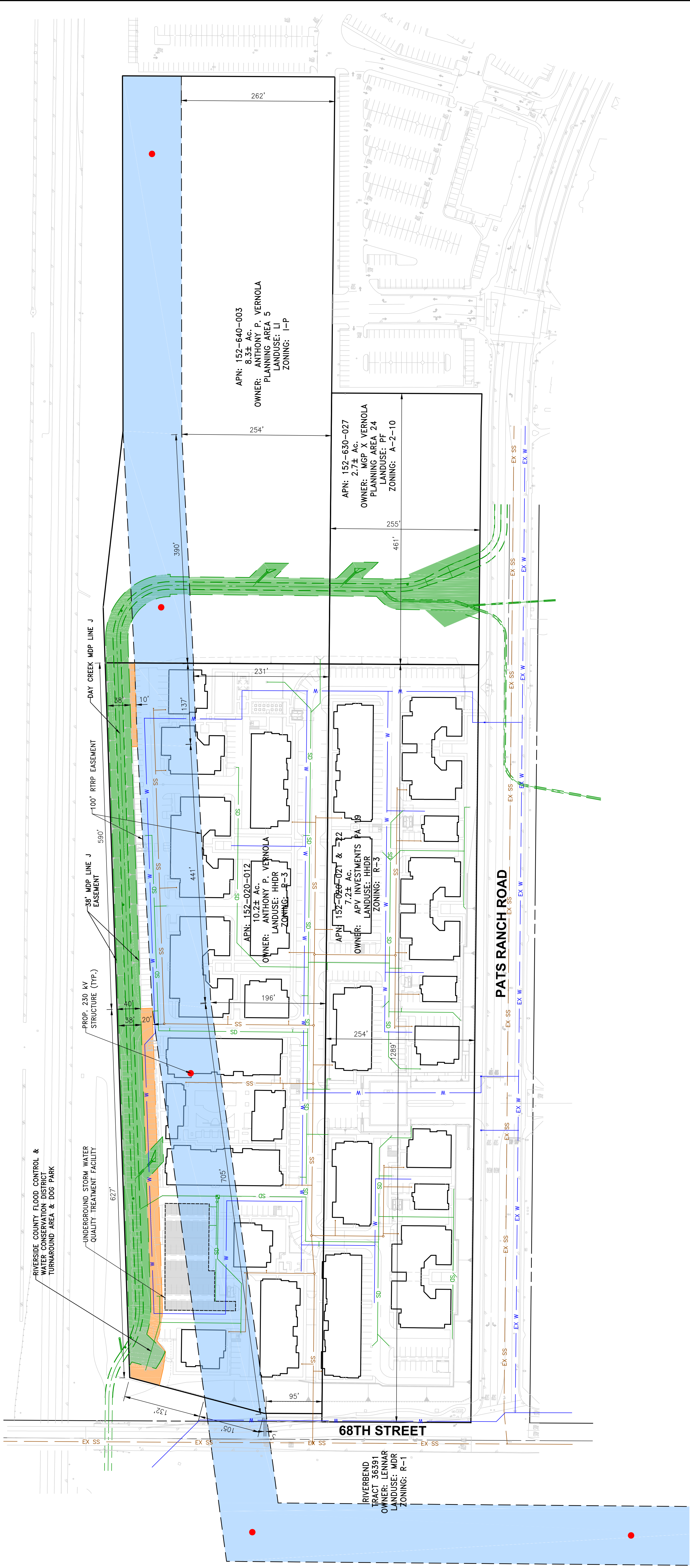
VERNOLA MARKETPLACE
APARTMENT COMMUNITY

100' RTRP EASEMENT
OVERLAPED WITH THE 38' WIDE
RIVERSIDE COUNTY FLOOD CONTROL
DAY CREEK MDP LINE J EASEMENT

SCALE: 1"=80'	ALBERT A.	ENGINEERING CONSULTANTS	W.O. 14-0152
DATE: 11/16/15	DESIGNED: JEFFREY A. WEBB	REGISTERED CIVIL ENGINEER	SHEET 1
CHECKED: JEFFREY A. WEBB	PH. (951) 686-1070	RIVERSIDE, CA 92506	OF 2
PLN CK REF:	ASSOCIATES	FAX (951) 788-1266	SHEETS
FB.			DWG. NO.

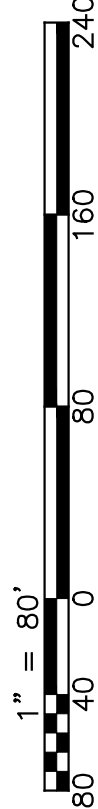
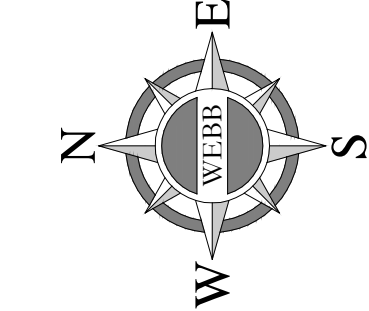
VERNOLA MARKETPLACE APARTMENT COMMUNITY

RTRP 100' EASEMENT ADJACENT TO THE DAY CREEK MDP LINE J STORM DRAIN AND SLOPE PROTECTION EASEMENTS



- LEGEND:**
- PROPOSED RTRP 100' EASEMENT
 - PROPOSED RTRP POLE
 - EXISTING RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT EASEMENT FOR FLOOD CONTROL AND DRAINAGE PURPOSES REC. 1/24/12 AS INST. # 2012-0030001
 - EXISTING RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT EASEMENT FOR SLOPE PROTECTION PURPOSES REC. 1/24/12 AS INST. #S 2012-0030002, 2012-0030003, & 2012-0030004
 - PROPOSED STORM DRAIN
 - PROPOSED WATERLINE
 - PROPOSED SEWER LINE
 - EXISTING WATERLINE
 - EXISTING SEWER LINE
 - EXISTING STORM DRAIN

NOTE:
DIMENSIONS & LOCATIONS SHOWN ARE APPROXIMATE ONLY. ACTUAL DIMENSIONS & LOCATIONS MAY DIFFER BASED ON FINAL RTRP ALIGNMENT.



VERNOLA MARKETPLACE
APARTMENT COMMUNITY

100' RTRP EASEMENT
ADJACENT TO THE 38' WIDE
RIVERSIDE COUNTY FLOOD CONTROL
DAY CREEK MDP LINE J EASEMENT

SCALE: 1"=80'	ALBERT A. WEBB ASSOCIATES	ENGINEERING CONSULTANTS	W.O. 14-0152
DATE: 11/16/15	DESIGNED: RYAN STEEN	PROJECT MANAGER	SHEET 2
CHECKED: PH. (951) 686-1070	PLN CK REF:	PH. (951) 788-1256	OF 2 SHEETS
			DWG. NO.

EXHIBIT E

EXHIBIT E

Southern California Edison Company

Transmission Line Right of Way Constraints and Guidelines

The primary purpose of SCE's Transmission Rights of Way (ROW) and Substations is to house SCE's electrical system and related facilities. SCE is committed to ensuring it operates and maintains a safe and reliable electric system, both, now and in the future.

The use of SCE's ROW is guided by California Public Utilities Commission regulations (General Order No. 69-C), which define the need to protect utility system operations and provide guidance on overall uses of the ROW, the types of agreements allowed, and related approval processes.

If you are proposing uses within SCE's ROW, please ensure that you contact SCE prior to developing your plans. Any proposed uses must be compatible, low-intensity uses (i.e. green belts, bike and hiking trails, etc.) that do not impose additional constraints on SCE's ability to maintain and operate its current facilities and that do not interfere with any future operating facility needs.

The following are constraints and guidelines to assist in the development of your plans within SCE's transmission ROW.

1. All projects are unique and will be reviewed on a case by case basis.
- ② Buildings and other permanent structures, both, above ground and underground, are prohibited within SCE's ROW. Examples of permanent structures are pipelines, concrete slabs, foundations, vaults, decks, detention basins, pools, and anything else that is not portable and easily movable.
3. No parallel or longitudinal encroachments will be permitted. All improvements crossing in the ROW must do so perpendicular to the centerline of the ROW.
4. Any proposed use(s) on SCE's ROW that are specifically prohibited in SCE's easement document will be denied.
- ⑤ SCE's access to its ROW and facilities must be maintained 24/7 and cannot be encumbered in order to ensure SCE's access for system operations, maintenance, and emergency response.
6. All proposed grading requires a clearance review. Costs for engineered conductor clearance reviews required by SCE are to be paid for by the requestor.
7. All users of SCE's land shall be responsible for compliance with all applicable federal, state, county, and local laws affecting use of SCE's land. The user must obtain all permits and other governmental approvals required for the proposed use.
8. No plant species protected by federal or state law shall be planted within SCE's ROW.
9. All new trees and shrubs proposed on SCE's ROW shall be slow growing and not exceed 15 feet in height.
10. No wetlands, other sensitive natural habitat, vegetation related natural plant areas, or environmental mitigation on SCE's ROW will be permitted as it creates interference with SCE's ability to access its facilities and to add future facilities.
- ⑪ Groundwater or storm water infiltration or recharge will not be allowed.
12. Flammable or combustible materials are not allowed to be used or stored on SCE's ROW.
13. SCE may require a third-party user to implement certain safety measures or mitigations as a condition to approval of the third-party use. Users of SCE's ROW must adhere to minimum grounding standards dictated by SCE.

14. Uses on SCE's ROW will not be approved if deemed unsafe. An example of an unsafe condition includes (but is not limited to) instances where the proposed use may create levels of induced voltage that are unsafe to SCE employees or the public that cannot be mitigated to safe levels.

15. Horizontal Clearances

○ Towers, Engineered Steel Poles & H-Frames	161kV to 500kV
▪ Lattice/Aesthetic & H-Frames (dead-end)	100 ft.
▪ Engineered Steel Poles (dead-end)	100 ft.
▪ Suspension Towers & H-Frames	50 ft.
▪ Suspension Steel Poles	50 ft.
○ Wood or Light-Weight Steel Poles & H-Frames	66kV to 115kV
▪ Engineered Steel Poles w/ Found. (TSP) (dead-end)	25 ft.
▪ H-Frame	25 ft.
▪ Wood Poles	25 ft.
▪ Light-Weight Steel Poles	25 ft.
▪ Anchor Rods	10 ft.
▪ Guy Wires	10 ft.
▪ Guy Poles	10 ft.
▪ Lattice Anchor Towers (dead-end)	100 ft.
▪ Lattice Suspension Towers	50 ft.

16. Vertical Clearances

○ Structure	
▪ 500kV	30 ft.
▪ 220kV	18 ft.
▪ 66kV	18 ft.
▪ <66kV (distribution facilities)	12 ft.
▪ Telecom	8 ft.
○ Vehicle Access	
▪ 500kV	36 ft.
▪ 220kV	30 ft.
▪ 66kV	30 ft.
▪ <66kV (distribution facilities)	25 ft.
▪ Telecom	18 ft.
○ Pedestrian Access	
▪ 500kV	31 ft.
▪ 220kV	25 ft.
▪ 66kV	25 ft.
▪ <66kV (distribution facilities)	17 ft.
▪ Telecom	10 ft.

17. Roads constructed on SCE ROW or where a third party's access road coincides with SCE's access to SCE ROW or facilities must comply with SCE's engineering standards.

- The drivable road surface shall be constructed to provide a dense, smooth and uniform riding surface. The minimum drivable road surface shall be 14 feet wide with an additional 2 feet of swale/berm on each side as required.
- The minimum centerline radius on all road curves shall be 50 feet measured at the centerline of the drivable road surface. The minimum drivable width of all roads shall be increased on curves by a distance equal to 400/Radius of curvature.
- The road shall be sloped in a manner to prevent standing water or damage from undirected water flow. Maximum cross slope shall not exceed 2%, maximum grade not to exceed 12%.

EXHIBIT F

EXHIBIT F



SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONAL Company

Siting Report

Riverside Transmission Reliability Project Alternative Segment Re-route Feasibility Study

Prepared: July 2015

Prepared by

Southern California Edison
Safety, Security and Compliance
Corporate Environment, Health and Safety Organization
Systems and Special Projects Group
Wendy Miller, Manager

4.2 Segment Elimination

To develop a top pool of segments, the project team discussed all segments to determine if they should be eliminated or retained for consideration. This section describes the segments that were eliminated through team review of the scores and team discussion.

4.2.1 Segment A – Limonite 1 (flood control channel to I-15)

In this segment, an approximately 440-foot-wide vacant strip exists on the south side between the flood control channel and Wineville Avenue. However, between Wineville Avenue and the I-15, the south side contains a residential development. The north side of the street is vacant, and the 230 kV line could cross from the south to the north side of the street. Construction appears to have proceeded on the vacant north parcel. SCE verified that the parcel is zoned for residential. SCE distribution planning also reported an active service application for a residential tract at this location. Therefore, the project team eliminated this segment because of the advanced stages of construction for the observed residential development.

4.2.2 Segment F – Flood Control Channel between Lucretia Avenue and Limonite Avenue

Segment F scored relatively well for most criteria, except for transmission and property acquisition. The flood control channel in this section is concrete-lined and contains a mixture of unimproved access roads and paved access roads. Low-density rural residential exists on both the east side and west side of the channel; the homes were generally closer to the streets while the back lots abutted the flood control channel. The back lots generally had small pens for animals such as goats and horses. For high-voltage lines SCE prefers to obtain full ownership, and it was unlikely that the County of Riverside's flood control administration would give up ownership of the flood control channel. Additionally, pole placement to completely avoid overhang into back yards may not be possible. The pole placement would also likely interfere with the maintenance of the flood control channel. Therefore, the project team eliminated Segment F from further consideration.

4.2.3 Segment J -Modification of Existing RTRP Segment through Riverbend

This proposed segment was an attempt to modify the segment of the proposed 230 kV route that overlaps with a portion of the Riverbend development. However, this alignment would result in the relocation of the existing subtransmission line, at least one side of conductor hanging over the traveled way of 68th Street, and likely needing to position the TSPs in, or immediately adjacent to, franchise - all of which still may not improve the compatibility between this RTRP segment and Riverbend. Therefore, the project team eliminated it from further consideration.

4.2.4 Segment L – Mira Loma-Bain-Pedley 66 kV ROW in Santa Ana River

The project team eliminated this segment for a variety of reasons. First, transmission engineering expressed significant concerns of exposing the TSP footings of a 230 kV line

August 31, 2006

CITY OF RIVERSIDE, CALIFORNIA (PUBLIC UTILITIES DEPARTMENT)

RIVERSIDE TRANSMISSION RELIABILITY PROJECT

SITING STUDY

PROJECT NUMBER:

109528

PROJECT CONTACT:

John McGrew, Project Manager

Mike Strand, Environmental Project Manager

EMAIL: jmcgrew@powereng.com

mstrand@powereng.com

PHONE: John McGrew (208) 788-0475

FAX: (208) 788-2082

Mike Strand (714) 507-2710

FAX: (714) 507-2799



CHAPTER 4: SENSITIVITY ANALYSIS RESULTS

4.1 INTRODUCTION

The sensitivity analysis process involves evaluating the data collected for each component and assigning appropriate sensitivity levels to that inventory. Methods used for this evaluation are outlined in Chapter 2. The specific sensitivities identified for each resource are listed below. This chapter also presents the results of the composite sensitivity analysis. Based upon the sensitivity analyses, a set of alternatives for the RTRP project components were developed. These alternatives are described in the last section of this chapter.

4.2 RESOURCE AREAS

4.2.1 Land Use

Land use sensitivity mapping was developed (Map 3) to reflect the sensitivity of land use resources relative to the development of alternative routes. Table 4-1 identifies specific land use components that were mapped within the study area and the corresponding sensitivity levels.

Table 4-1 Land Use Sensitivity

Land Use Component	Exclusion	High Avoidance	Moderate Avoidance	Low Avoidance or Opportunities
Airport	•			
Residential (existing) – Assumes non-removal of residences. Actual distances to residences would be dictated by Public Utility Commission’s General Order (GO) 95 “Rules for Overhead Electric Line Construction”.	•			
School (School Site and Facilities)	•			
Residential (planned)		•		
School Buffer Zones – California Department of Education guideline is 150 feet from the edge of an easement for a 220-230 kV line. This guide has been designed to help school districts select and gain state approval for school sites.		•		
National Trail		•		
County/City/Private Park, Recreation, and Preservation Area		•		
Mitigation Bank		•		
Multiple – Species Habitat Conservation Plan Criteria Area/Criteria Cell		•		
County Scenic Highway		•		
Active Landfill		•		
Commercial			•	
Golf Course			•	

Agriculture			•	
Industrial				•
Vacant/Undeveloped				•
Roads (Interstate, State Highway, County Road)				•
Railroads*				•
Transmission Lines				•

* Although considered an opportunity, construction, operation, maintenance, repair or removal of a transmission line, in close proximity to a railroad, could create interference issues. Interference includes, but is not limited to, physical interference from electromagnetic induction, electrostatic induction, or from stray or other currents, with the operation, maintenance or use of right-of-way, tracks, structures, pole lines, signal or communication lines, radio or other equipment, devices or other property appurtenances. As a result, appropriate mitigation/protection may be necessary.

4.2.2 Visual Resources

Potential visual impacts to recreational viewers and along officially designated corridors will potentially be high for all significant resources identified. High sensitivity is typically expected for residential areas and residences regardless of the setting. For users of parks, recreation and special trails in an urban environment such as one that occurs in the project area, high sensitivity is also expected for these areas due to the high use coupled with high user expectation (user attitudes). For designated scenic roadways, gateways and City of Riverside cemeteries, official designation and specific references in LORS specifically identify that scenic beauty and visual quality are an important, if not primary, considerations during the planning process. Therefore, all of these areas inventoried may potentially cause high impacts on visual resources within the project area, and therefore have High Avoidance Level.

Because of the dominance of residential areas and abundant parks and recreation sites in the study area coupled with ½ mile buffering, most of the study area is located in a High Avoidance Level designation. Visual resources do not significantly contribute to the identification of routing options at this level of detail, and therefore the visual resource sensitivity map was not used in producing the Composite Sensitivity Map.

4.2.3 Cultural Resources

A general sensitivity rating was determined for specific portions of the project area to distinguish areas of high and low sensitivity based upon the areas potential for cultural resources. High sensitivity was based on: 1) the presence of known archaeological or historical site distributions; 2) geographical features that are known to contain numerous cultural resources; and 3) large parcels of unsurveyed and undeveloped land for which there is no information available on cultural resources and which appear to be undisturbed. Areas low in cultural resource sensitivity are: 1) previously surveyed parcels that do not contain cultural resources; and 2) recently developed areas that area unlikely to contain intact or undisturbed cultural resources. High and low sensitivity areas for cultural resources are illustrated in Map 4.

These broadly categorized areas were mapped as a GIS cultural resources sensitivity layer for future planning considerations. High sensitivity areas for cultural resources are located along the Santa Ana River drainage and in the Jurupa Mountains in the northern part of the project area. The remainder of the project area is classified as low sensitivity.

The sensitivity assessment was based on existing records only and has not been confirmed in the field. Overall, less than 50 percent of the project area has been surveyed for archaeological and historical resources. It is likely that future surveys of the currently unsurveyed portions of the project area will result in the identification of additional sensitive cultural resources and of locations that definitely do not contain cultural

EXHIBIT G

EXHIBIT G



Memorandum

To: Rick Bondar

From: Jason Ardery

Date: August 5, 2015

Re: Vernola Marketplace Apartment Community RTRP Conflict Areas

Rick,

Based on the alignment of the RTRP project, depicted in the attached exhibit, there will be significant impacts to the approved Vernola Marketplace Apartment Community project:

1. The proposed alignment, at a minimum, would require the loss of 8 Buildings (Building 1, 3, 5, 7, 8, 24, 25, & Clubhouse) due to conflicts with the proposed alignment and easement area as shown in Attachment 4 - SCE Visual Simulations – Page 3 “Vernola Marketplace and Riverbend Communities Conflict Areas”.
2. The alignment is located over the storm water quality treatment facilities (underground infiltration) proposed for the project. Redesign of the site would be necessary to locate the proposed storm water quality treatment facilities outside of the easement area that will result in loss of additional buildings.
3. 68th Street is in the vicinity of Caltrans right-of-way, and permission from Caltrans to allow access to 68th Street may be required, and does not appear to have been addressed in the RTRP alignment. Even if the access is allowed, there is a significant change in elevation from 68th Street to the project site. Providing access to the proposed SCE easement from 68th Street would require significant grading on the Vernola Marketplace Apartment Community project site, which does not appear to have been taken into consideration.
4. Based on the alignment provided, the easement overlaps with the existing storm drain easement for the Day Creek Master Drainage Plan Line J Stage 2 storm drain line, a 12' wide by 6' high Reinforced Concrete Box (RCB) owned and operated by Riverside County Flood Control and Water Conservation District (RCFC&WCD). This existing storm drain facility is located in a 38' wide easement running parallel to Caltrans right-of-way with an offset of 2' on Vernola Marketplace Apartment Community project site. The easement deeded to RCFC&WCD does not allow any structures within their easement area. Additionally, the alignment may interfere with operations and maintenance of the storm drain facility. This does not appear to have been taken into consideration in the RTRP alignment proposed.
5. Vernola Marketplace Apartment Community project site drains to Day Creek Master Drainage Plan Line J Stage 2 storm drain line. Drainage facilities would need to cross the proposed RTRP alignment. It is not clear if drainage facilities can be located within the easement area depicted. Without a

drainage connection to Day Creek Master Drainage Plan Line J Stage 2, the project does not have an adequate drainage outlet, and development of the project would be infeasible.

6. Based on the alignment provided, encroachment into the easement area would likely be needed for a water line to provide fire protection to the apartment buildings. This would likely be both a perpendicular and parallel encroachment into the RTRP easement area. It is not clear if these encroachments are allowed or have been taken into consideration in the RTRP alignment.
7. The alignment is located over proposed parking stalls (covered & open) required for the project. It is not clear if parking (covered or open) can be located within the proposed easement area of the alignment. If parking (including covered parking) cannot be located in the easement area of the alignment, redesign of the site would be necessary, potentially resulting in the loss of additional buildings to meet minimum parking requirements.

Without construction drawings for the RTRP alignment, final impacts to the Vernola Marketplace Apartment Community cannot be determined.

EXHIBIT H

EXHIBIT H



WESTERN NATIONAL PROPERTIES
A WESTERN NATIONAL GROUP COMPANY

8 Executive Circle, Irvine, California 92614-6746
P.O. Box 19528, Irvine, California 92623-9528
949.862.6200 Fax.862.6497
www.wng.com

November 17, 2015

Mr. Anthony P. Vernola
P.O. Box 217
Upland, CA 91785-0217

Re: Vernola Marketplace Apartments

Dear Mr. Vernola:

Over the past three years we have been working with you to develop an end product of a Class "A" resort style apartment community on your property. We suggested building this product, the Vernola Marketplace Apartment Community (the "Apartment Project"), at the northwest corner of 68th Street and Pats Ranch Road in the City of Jurupa Valley to take advantage of the nearby commercial area, the new school and nearby park sites.

As you know, we are now faced with potentially needing to revamp the Apartment Project to accommodate the Riverside Transmission Reliability Project ("RTRP"). The RTRP threatens to significantly and negatively impact the scope and viability of the Apartment Project. Should the RTRP run through your property, the Apartment Project becomes a different product. All the units (165) to the west of the purple line on the attached map would be lost, and all the units to the west of the spine road (an additional 50 units) would likely be unrentable; this would result in a total loss of 215 units. The RTRP also runs directly over certain utilities, the underground storm water treatment system and parking spaces, which could result in the loss of additional units. In addition to the aforementioned lost units, the clubhouse, pool, leasing and administrative center will need to be relocated which will result in a further reduction in the remaining units.

The RTRP changes the entire Apartment Project to a compressed project in the shadow of aerial 230kV transmission lines and towers; the resort style apartment complex that was contemplated is lost. We feel a downsized apartment project resulting from the impact of the RTRP would not result in the type of development which would be appropriate for the market in this area, and we would not be interested in proceeding with the resized project.

Very truly yours,

WESTERN NATIONAL PROPERTIES

Rex DeLong
President

cc: Rick Bondar



VERNOLA MARKETPLACE APARTMENT COMMUNITY | 397 Units

EXHIBIT I

EXHIBIT I

EXHIBIT I



VERNOLA MARKETPLACE APARTMENT COMMUNITY | at Gateway to Jurupa Valley | 397 Units

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of SOUTHERN
CALIFORNIA EDISON COMPANY (U 338-E)
for a Certificate of Public Convenience and
Necessity for the Riverside Transmission
Reliability Project

A.15-04-013
(Filed April 15, 2015)

CERTIFICATE OF SERVICE

I, the undersigned, state that I am a citizen of the United States and am employed in the City of Costa Mesa, County of Orange; that I am over the age of eighteen years; am not a party to the within cause; and that my business address is 611 Anton Boulevard, Suite 1400, Costa Mesa, CA 92626.

I am readily familiar with Rutan & Tucker, LLP's practice for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

I hereby certify that on November 30, 2015, I served a copy of VERNOLA MARKETPLACE APARTMENTS COMMUNITY's Response to September 23, 2015 Information Request dated November 30, 2015, by the means identified below:

☒ **By Electronic Mail and Overnight Delivery:** Serving the enclosed document(s), via electronic mail and by overnight delivery, to each of the parties listed below:

Jensen Uchida
Project Manager
Energy Division, CEQA Unit
State of California
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Telephone: (415) 703-5484
Email: Jensen.Uchida@cpuc.ca.gov

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Project and Program Supervisor
Energy Division, CEQA Unit
State of California
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505 Van Ness Avenue
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Jack M. Mulligan, CPUC Legal Counsel
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Legal Division
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Email: jack.mulligan@cpuc.ca.gov

☒ **By Electronic Mail:** By serving the enclosed document(s), via electronic mail, to each of the parties listed below:

B. Tilden Kim, Esq.
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Los Angeles, CA 90071-3101
Rosemead, CA 91770

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Attorney for SCE
Telephone: (626) 302-6980
Email: ian.forrest@sce.com

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 30th day of November, 2015, at Costa Mesa, California.



Mia R. Slobodien