

**Southern California Edison Company's Response to the California Public Utilities
Commissions' Deficiency Report For The Riverside Transmission Reliability Project
Application (A.15-04-013)
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QUESTION 1 - "SCE's Application, Final EIR, and Administrative Record do not contain adequate information to document the change in circumstances since Riverside certification of the Final EIR. Additional information is required regarding the Riverbend housing project and Vernola Marketplace Apartment Community to document the current baseline conditions in the proposed RTRP alignment. This information should include modifications to the environmental setting in the EIR to reflect the conditions in the transmission corridor resulting from the approved subdivisions consistent with the requirements of the CPUC PEA Checklist for Transmission line Projects (October 2008) including:

- 1. Documentation of baseline aesthetic conditions at the approved housing developments.**
- 2. Updated agricultural setting to reflect the Riverbend housing project within an area that was previously Williamson Act farmland.**
- 3. Updated habitat acreages within the transmission corridor to reflect grading and other habitat modifications since the filing of the EIR.**
- 4. Updated land use and zoning designations to reflect the approved residential developments.**
- 5. Updated transportation and traffic conditions to reflect the approved residential developments and current traffic volumes."**

In responding to this question, SCE notes that the City of Jurupa Valley ("Jurupa Valley") and certain protestors to the Riverside Transmission Reliability Project ("RTRP") Application and proceeding (A.15-04-013) have asserted that various projects may be developed along the RTRP transmission corridor approved by the City of Riverside ("Riverside"), in addition to the Vernola Marketplace Apartment Community ("Vernola Apartment Project") and Riverbend Housing Development ("Riverbend Project"). Thus, in order to effectively respond to this question and avoid speculation inconsistent with the California Environmental Quality Act ("CEQA"), SCE made the following assumptions with respect to the RTRP transmission corridor baseline conditions:

1. In addition to the aforementioned Vernola Apartment and Riverbend Projects, other projects assumed as part of the baseline conditions have all required discretionary approvals or have begun construction as of July 1, 2015. A listing and map of the approved projects meeting this criteria within the vicinity of the proposed project are included as Attachment 1 (*List and Map of Approved Projects*) to this response.
2. Baseline conditions are provided as of July 1, 2015.

Generally, with the exception of changed land use designations, modifications to the 230 kV transmission corridor's environmental setting described in the RTRP Final EIR are minimal.

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1. Documentation of baseline aesthetic conditions at approved housing developments:

Vernola Marketplace Apartment Project

Site Conditions: Under existing conditions, the Vernola Apartment Project site is vacant, undeveloped land that is devoid of any buildings or other structures and no site improvements. The eastern half has been used for soil stockpiling.

Surrounding Conditions:

- **North:** Directly north is vacant, undeveloped land. Further north and south of Limonite Avenue is a 387,000 square-foot commercial center known as the “Vernola Marketplace Shopping Center,” which is described in RTRP’s Final EIR. The RTRP transmission corridor was specifically re-routed to mitigate potential impacts to the Vernola Marketplace Shopping Center (*see e.g.*, RTRP Final EIR, Vol. 2, sections 2.3.1 (*SCE 230 kV Transmission Line*), 3.2.1 (*Aesthetics*), 3.2.9 (*Land Use and Planning*), 3.2.15 (*Transportation and Traffic*), 6.2.1 (*230 kV Transmission Line Routes*), 6.4.3 (*Alternative Technologies*)).
- **South:** The Vernola Apartment Project site is bounded on the south by 68th Street, south of which is graded land.
- **East:** The Vernola Apartment Project site is bounded on the east by Pats Ranch Road, east of which are single-family detached homes in several neighborhoods that comprise the master planned community known as “Township Place.” Potential impacts to Township Place were included in RTRP’s Final EIR (*see* RTRP Final EIR, Vol. 1, Comment Letter XXXX (Barry and Donna Wallner) and response thereto).
- **West:** To the west of the Vernola Apartment Project site is Interstate 15 (I-15).

Riverbend Housing Development Project

Site Conditions: As of the date of Riverside’s adoption of RTRP’s Final EIR (February 5, 2013), the Riverbend Project was used for livestock grazing and the planting and harvesting of field crops. Two occupied residences, currently housing a total of three (3) people, were also located on-site. At the date of this response, the Riverbend Project site is under grading operations including grading, filling, and leveling.

Surrounding Conditions:

- **West:** To the west of the Riverbend Project site is the I-15 freeway.
- **East:** Immediately abutting the Riverbend Project site to the east is the Goose Creek Golf Club, a public golf course that features an 18-hole golf course, practice facility, and club house. Potential impacts to the Goose Creek Golf Club were included in RTRP’s Final EIR (*see* RTRP Final EIR, Vol. 1, Comment Letters O (Jeffrey Smith, RMT, Inc.), KKK

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(Stephen Anderson), UUU (Lane Thomas representing Goose Creek Golf Club LLC), HHHH (Betty Anderson), JJJJ (Bonnie Kimm and Irene Kimm Hammons), and responses thereto; RTRP Final EIR, Vol. 1, sections 1.2 (Project Changes In The Final EIR), 2.2.1 (Master Responses To Comments); RTRP Final EIR, Vol. 2, sections ES.4 (*Project Changes*), 2.3.1 (*SCE 230 kV Transmission Line*), 2.5.2 (*Transmission/Subtransmission Line Construction*), 3.2.1 (*Aesthetics*), 3.2.4 (*Biological Resources*), 3.2.14 (*Recreation*), 4.2.14 (*Recreation*).

- **North:** Immediately abutting the Riverbend Project site to the north is 68th Street. North of 68th Street is a vacant site with an approved housing development (the Vernola Apartment Project) which spans from the I-15 to Pats Ranch Road. From Pats Ranch Road to Carnelian Street is a single family housing community. Louis Vandermolen Elementary School is located between Carnelian Street and Wineville Avenue. Single family residences then lie East of Wineville Avenue to the terminus of 68th Street.
- **South:** Immediately abutting the Riverbend Project site to the south is the Santa Ana River and undeveloped open space associated with the Santa Ana River floodplain.

Stratham Homes

Site Conditions: Under existing conditions, the Stratham Homes project site is an operating dairy farm. Structures used to shelter dairy cows and support dairy activities are present on the site.

Surrounding Conditions:

- **West:** Immediately west of the Stratham Homes project is Wineville Avenue. Just beyond Wineville Avenue is an existing industrial/commercial complex with office use in the front along Cantu-Galleano Road and warehouse use in the rear, accessed from Wineville Avenue.
- **East:** Immediately east of the Stratham Homes project is a Lyon Homes (Hillcrest Homes). Lyon Homes is a single family home development with 112 residential units.
- **North:** Immediately north of Stratham Homes is Cantu-Galleano Road. Just beyond Cantu-Galleano Road is an existing industrial site occupied by Hino, a Japanese commercial truck manufacturer.
- **South:** Immediately south of the Stratham Homes project is also the Lyon Homes development which is a single family home development with 112 residential units.

Lyon Homes (Hillcrest Homes)

Site Conditions: Under existing conditions, the Lyon Homes project site is currently being developed as a single family home development with 112 residential units.

Surrounding Conditions:

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- **West:** Immediately west of the Lyon Homes project is Wineville Avenue. Just beyond Wineville Avenue is an existing industrial/commercial complex with office use in the front along Cantu-Galleano Road and warehouse use in the rear, accessed from Wineville Avenue and Thoroughbred Business Park, an industrial/commercial park which has not been yet developed.
- **East:** Immediately east of the Lyon Homes project is a Lennar Homes housing development currently undergoing construction.
- **North:** Immediately north of Lyon Homes is Stratham Homes, a proposed residential development currently used as a dairy farm and Cantu-Galleano Road. Just beyond Cantu-Galleano Road is an existing industrial site occupied by Hino, a Japanese commercial truck manufacturer.
- **South:** Immediately south of the Lyon Homes project is Bellegrave Avenue. Just beyond Bellegrave Avenue are existing single family homes.

APV Investments #2 Project

Site Conditions: Under existing conditions, the APV Investments Phase #2 project is vacant and cleared property.

Surrounding Conditions:

- **West:** Immediately west of the APV Investments #2 project is a vacant site which is zoned residential.
- **East:** Immediately east of the APV Investments #2 project is Wineville Avenue. Just beyond Wineville Avenue are existing single family homes.
- **North:** Immediately north of APV Investments #2 is an existing vacant site. Just beyond the vacant site is Vernola Park.
- **South:** Immediately south of APV Investments #2 is APV Investments #1, a single family development which is in construction. Beyond APV Investments #1 is Limonite Avenue.

APV Investments #1 Project

Site Conditions: Under existing conditions, the APV Investments Phase #1 project is a housing development undergoing construction.

Surrounding Conditions:

- **West:** Immediately west of APV Investments #1 project is Pats Ranch Road, beyond which is vacant property that is zoned commercial, industrial and residential.
- **East:** Immediately east of APV Investments #1 project is Wineville Avenue. Just beyond Wineville Avenue are existing single family homes.

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- **North:** Immediately north of APV Investments #1 is an existing vacant site (APV Investments #2 project site).
- **South:** Immediately south of APV Investments #1 is Limonite Avenue. Just beyond Limonite Avenue are single family homes.

Thoroughbred Farm Business Project

Site Conditions: Under existing conditions the industrial/commercial property is vacant and undeveloped.

Surrounding Conditions:

- **West:** To the west of the Thoroughbred Farm Business Park Project site is the I-15 freeway.
- **East:** Immediately east of the Thoroughbred Farm Business Park Project is Wineville Avenue. Just beyond Wineville Avenue is Lyon Homes, an existing single family residential development with 112 units.
- **North:** Immediately north of the Thoroughbred Farm Business Park project is Landon Avenue, north of which is an industrial/commercial building with office use fronting Cantu-Galleano Road and warehouse use in the rear accessed by Wineville Avenue.
- **South:** Immediately south of the Thoroughbred Farm Business Park project is Bellegrave Avenue. Just beyond Bellegrave Avenue is an agricultural property and Vernola Park.

2. *Updated agricultural setting to reflect the Riverbend housing project within an area that was previously Williamson Act farmland.*

The Riverbend Project is located on lands formerly zoned as Heavy Agricultural (A-2-10) and under Williamson Act contract. The Williamson Act Properties under Mira Loma Agricultural Preserves No. 1, No. 11, and No. 14 were approved for delisting from the Williamson Act Program by the City of Jurupa Valley on November 20, 2014. Additionally, Jurupa Valley approved a zone change from Heavy Agricultural (A-2-10) to Planned Residential (R-4) on November 7, 2013 (*see* Jurupa Valley ORD NO. 2013-10). SCE is informed that the Riverbend Project land has been graded by Lennar Homes, Inc. ("Lennar").

3. *Updated habitat acreages within the transmission corridor to reflect grading and other habitat modifications since the filing of the EIR.*

As of the date of Riverside's adoption of RTRP's Final EIR (February 5, 2013), the Riverbend Project and Vernola Apartment Project properties were identified as Bare Ground/Disturbed and were not considered suitable habitat for sensitive species or plant communities. The rough grading of the Riverbend Project property that has occurred subsequent to certification of RTRP's Final EIR does not change the habitat acreages described in RTRP's Final EIR. Similarly, while the

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Vernola Apartment Project property has not been graded or improved, such changes would not result in changes in habitat acreages documented in RTRP's Final EIR.¹

4. Updated land use and zoning designations to reflect the approved residential developments.

As of July 1, 2015, Jurupa Valley has adopted four (4) zone/land use changes since the RTRP Final EIR was certified (February 2013):

1. ORD No. 2013-10 the change in zone for 215-acres from Heavy Agricultural (A-2-10) to Residential (R-4) and Watercourse, Wetland, Water Conservation Area (W-1) to Residential (R-4).
2. ORD No. 2015-05 the change in zone of 17.4-acres from Industrial Park (IP) to General Residential (R-3).
3. ORD No. 2015-01 the change in zone of 22-acres of Residential Agricultural (R-A) to One-Family Dwelling (R-1).
4. ORD No. 2014-12 the change in zone of 36.65-acres of Heavy Agriculture (A-2-20) to One-Family Dwelling (R-1).

5. Updated transportation and traffic conditions to reflect the approved residential developments and current traffic volumes.

As of July 1, 2015, neither the Vernola Apartment nor Riverbend Projects were operational. Jurupa Valley references traffic analyses in the October 8, 2013 and January 29, 2015 Initial Study / Mitigated Negative Declarations ("IS/MNDs") prepared for the Riverbend and Vernola Apartment Projects, respectively.²

While SCE cannot independently verify Jurupa Valley's traffic analyses or its conclusions, the traffic study for the Riverbend Project concluded that the intersection of Pats Ranch Road and 68th Street would change from a LOS B (low delays values and short cycle delays) to LOS F (operation with delays unacceptable to most drivers due to saturation) once it was complete.³ The same analysis assumed roadway improvements would mitigate this impact to less than significant levels.⁴

¹ See RTRP Final EIR at Figure 3.2.4-1 at page 3-91.

² See Initial Study / Mitigated Negative Declaration, Riverbend, Master Case 1201 (October 8, 2013), Attachment 2 hereto; Initial Study / Mitigated Negative Declaration, Vernola Marketplace Apartments, Master Application 1485 (January 29, 2015), Attachment 3 hereto (also available at <http://jurupavalley.org/Portals/21/Documents/Public%20Information%20and%20Notices/Public%20Notices/Vernola%20Marketplace%20Apartments/Final%20DraftIS-MND.forpublication.1-27-2015%20-%20Collated.pdf>).

³ See Riverbend Project IS/MND at pgs. II-153 to II-179.

⁴ See *id.* at pgs. II-166 – II-167 (referencing mitigation measures TR-2 and TR-3).

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The traffic study for Vernola Apartment Project concluded that once that project is completed, the intersection of Pats Ranch Road and 68th Street (located immediately adjacent to RTRP) would change from a Level of Service (LOS) E (high delays values and long cycle delays) to LOS F (operation with delays unacceptable to most drivers due to saturation).⁵ Again, the same analysis assumed roadway improvements would mitigate this impact to less than significant levels.⁶

⁵ See Vernola Apartments Project IS/MND at pgs. 6-103 to 6-119.

⁶ See *id.* at pgs. 6-110 (referencing mitigation measure TR-2).

QUESTION 2 - "SCE's Application, Final EIR, and Administrative Record do not provide an assessment of the environmental impacts of the RTRP on the Riverbend housing project (466 single family lots) and the Vernola Marketplace Apartment Community. The following information is needed to evaluate impacts on the residential developments, consistent with the CPUC PEA Checklist for Transmission line Projects (October 2008):

- 1. A visual simulation of the RTRP with the proposed housing development and analysis of cumulative aesthetic impacts from the housing developments and the RTRP.**
- 2. Revisions to the area of agricultural impacts provided in the EIR to reflect the conversion of Williamson Act farmland at the Riverbend housing project to a residential development.**
- 3. Updates to the habitat impact acreages in the EIR to reflect grading of the Riverbend project and any other changes in baseline conditions since publication of the EIR.**
- 4. Description of hazards associated with construction and operation of the proposed project within the approved residential developments.**
- 5. Land use impacts associated with conflicts between the proposed project transmission alignment and the approved residential developments.**
- 6. Increased noise impacts from construction within residential subdivisions and long-term corona noise impacts on the subdivision.**
- 7. Impacts from construction and operation of the proposed project on transportation and traffic considering the roads that are proposed within the approved subdivisions.**
- 8. Impacts of the proposed project on population and housing.**
- 9. Cumulative impacts of the proposed project with other cumulative projects that are currently planned in the area."**

As explained in *Southern California Edison Company's (U 338-E) Reply To Protests* (June 11, 2015), once the California Independent System Operator ("CAISO") determined the need for Riverside Transmission Reliability Project (RTRP) and directed its construction in June 2006, the City of Riverside ("Riverside") began the development of RTRP's Environmental Impact Report ("EIR"). These efforts culminated on February 5, 2013, when the Riverside City Council certified the Final EIR and approved the Project.

During this process, Riverside met with concerned developers and responded to comments received, including those on behalf of Jurupa Valley, the Riverbend housing development, and the developer of the Vernola Marketplace Apartment Community project.⁷ For example, during

⁷ Comments from various land owners included: John A. Ramirez, Rutan & Tucker, LLP on behalf of the Vernola Family and the Sky Country East Investment Co./East LLC (*see* RTRP Final EIR, Vol. 1 at 2-250, Comment Letter ZZZ); Allan J. Kasen, Vestar Development Co. on behalf of Vernola Marketplace, LLC (*see id.* at 2-253, Comment Letter AAAA); K. Erik Friess, Allen Matkins Leck Gamble Mallory & Natsis LLP, representing CV Communities, LLC (*see id.* at 2-267, Comment Letter DDDD); Rick Bondar, McCune & Associates, Inc. (*see id.* at 2-309,

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its design phase, RTRP was actually re-routed to minimize impacts on the Vernola Marketplace, a separate development immediately to the north of the Vernola Apartments Project and, SCE is informed, is owned by the same developers now protesting this Amended Application.

In its RTRP Comment Letter (labeled by Riverside as "DDDD"), CV Communities, LLC described the nascent conceptualization of what would become the Riverbend Project (currently owned and being developed by Lennar, a protester here). CV Communities, LLC alleged that RTRP did not adequately consider Riverbend in its scoping and development. However, at the time the Draft EIR was prepared, no application for the Riverbend project had even been filed (it was not filed until July 2012) and, as Riverside's Final EIR noted in its response to comments, there was insufficient information offered regarding submittal dates, approval dates, or other information to attribute an adverse impact to what was then an undeveloped parcel with speculative plans for improvement.⁸ The concerns of certain other intervening developers and/or Attachment 1 projects here were either addressed in the EIR,⁹ those developers elected to not participate in RTRP's administrative process, and/or they proceeded with their respective developments despite RTRP's proposed route.

Adding to the irony, the information requested here ("an assessment of the environmental impacts of the RTRP on the Riverbend housing project ... and the Vernola Marketplace Apartment Community") should have been developed by the City of Jurupa Valley when it elected to approve the Riverbend and Vernola Apartment projects *after* Riverside had adopted RTRP's proposed 230 kV transmission route. Jurupa Valley declined to do so, despite SCE and Riverside filing comment letters to this effect.¹⁰ To the extent that any questions regarding environmental impacts exist, they have resulted from the Riverbend and Vernola Apartment Project's approvals without proper consideration of RTRP within their supporting CEQA documents and analyses.

Notwithstanding these objections and as generally explained below, SCE found that the modifications of the 230 kV transmission corridor's current environmental setting (as of July

Comment Letter RRRR); and Brandon Roth on behalf of Stratham Homes (*see id.* at 2-322, Comment Letter DDDDD).

⁸ See Final EIR, Vol. 1 at 2-267 to 2-318.

⁹ The Final EIR, Vol. 2 at 3-263 acknowledges "The location of the ROW within existing and planned developments could result in direct impacts where operation would preclude or impair future development activities (*e.g.*, development-level land uses [*e.g.*, specific plans], as well as approved tract and parcel maps and plot plans)."

¹⁰ SCE and Riverside have also filed lawsuits challenging the propriety of Jurupa Valley's approval of the Vernola Apartment Project given, *inter alia*, this failure to properly consider RTRP within the CEQA documents prepared in support of that project. See *City of Riverside v. City of Jurupa Valley, et al.*, Verified Petition For Writ Of Mandate And Complaint For Declaratory And Injunctive Relief Under The California Environmental Quality Act, Case No. RIC1504611 (filed April 17, 2015); *Southern California Edison Co. v. City of Jurupa Valley, et al.*, Verified Petition For Administrative Mandamus, Writ Of Mandamus, and Injunctive Relief, Case No. RIC1504590 (filed April 17, 2015).

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2015), as compared with the environmental setting described in the RTRP Final EIR, are minimal. The threshold criteria that would require a subsequent or supplemental EIR under CEQA, namely substantial evidence of new significant environmental impacts or a substantial increase in the severity of a documented environmental impact, are not present here.¹¹ In the absence of any such substantial evidence (and none is present for RTRP), the CPUC, as a responsible agency, is obligated to consider the RTRP Final EIR certified by Riverside as valid.¹² The RTRP Final EIR made a full and good faith attempt to disclose all relevant information and potential impacts and has already been upheld by a decision of the Los Angeles Superior Court,¹³ and none of the protests identifies any change in circumstances that would cause new potentially significant impacts necessitating reopening a CEQA review.

1. A visual simulation of the RTRP with the proposed housing development and analysis of cumulative aesthetic impacts from the housing developments and the RTRP.

To assist in preparation of the visual simulations, SCE requested visual simulation data via data requests issued to the Riverbend and Vernola Apartment Projects on June 30, 2015. Information on these projects was also sought from Jurupa Valley. Using the responsive information provided, together with information on the RTRP's proposed transmission facilities, visual simulations of the RTRP with the Riverbend and Vernola Apartment Projects were developed. These simulations are included as Attachment 4 (*SCE Visual Simulations*) to this response.

RTRP is not expected to result in significant cumulative aesthetic impacts given Jurupa Valley's recently approved projects (*see Attachment 1* hereto) are urban in nature and electrical line facilities are not uncommon in urban settings. The RTRP Final EIR identified no designated scenic vistas in the vicinity of RTRP's proposed transmission line.¹⁴ Additionally, existing transmission line facilities in the vicinity of the proposed transmission line "are existing visual elements that contribute to the definition of the current landscape character."¹⁵ RTRP's Final EIR does note that "there are immitigable impacts from some portions of the 230 kV route that would degrade the visual character and quality of the interface of residential, recreational, and the Santa Ana River's trails and open space uses,"¹⁶ as well as potential impacts on *undesignated* scenic

¹¹ See CEQA Guidelines §§ 15162, 15163.

¹² See CEQA Guidelines § 15096(e)(2).

¹³ See *City of Jurupa Valley v. City of Riverside, et al.*, Los Angeles Superior Court Case No. BS 143085.

¹⁴ See RTRP Final EIR, Vol. 2, at 3-38 to 3-39 (describing RTRP's impacts on scenic vistas).

¹⁵ See *id.* at 3-39 to 3-40 (describing RTRP's impacts on the visual character of the surrounding areas).

¹⁶ See *id.*

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vistas along 68th Street.¹⁷ However, RTRP adopted mitigation to offset this impact to the extent feasible.¹⁸

Because neither RTRP nor the recently approved projects appear to be located within designated scenic viewsheds and are not expected to significantly change the character of the existing built environment, RTRP is not expected to result in a cumulatively considerable aesthetic impact.¹⁹

2. Revisions to the area of agricultural impacts provided in the EIR to reflect the conversion of Williamson Act farmland at the Riverbend housing project to a residential development.

RTRP traverses lands previously under a Williamson Act contract (*i.e.*, Mira Loma Agricultural Preserves No. 1, No. 11, and No. 14). The RTRP Final EIR identified a less than significant impact to a Williamson Act Contract as electrical facilities are compatible uses with lands under Williamson Act contracts.²⁰ As these Williamson Act contracts have now expired, the analysis would be revised to "No Impact" as there would be no lands under Williamson Act contracts which RTRP would traverse.

3. Updates to the habitat impact acreages in the EIR to reflect grading of the Riverbend project and any other changes in baseline conditions since publication of the EIR.

At the time Riverside adopted RTRP's Final EIR (February 5, 2013), the Riverbend Project site was identified as Bare Ground/Disturbed and was not considered suitable habitat for sensitive species or plant communities.²¹ The rough grading of the Riverbend Project property does not change the habitat acreage in the RTRP Final EIR. There has been no baseline condition change in habitat areas since the completion of the RTRP Final EIR.

4. Description of hazards associated with construction and operation of the proposed project within the approved residential developments.

Once completed, RTRP would not be located "within" the Vernola Apartment or Riverbend Projects; housing within the 100-foot right of way (ROW) would not be permitted. As RTRP

¹⁷ See RTRP Final EIR, Vol. 2, at 3-38 to 3-39 (describing RTRP's impacts on scenic vistas).

¹⁸ See *id.* at Table 3.2.1-2 at 3-37 to 3-38.

¹⁹ See also response to Question 2-9 below.

²⁰ See RTRP Final EIR, Vol. 2, at 3-57.

²¹ See *id.* at Figure 3.2.4-1 and pg. 3-93 (describing "Bare Ground / Disturbed" designation).

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would be operated and maintained within a 100-foot ROW void of any housing structures, RTRP is not expected to pose significant hazards to residences.

Additionally, it is expected that RTRP will employ conventional methods of construction and will not require atypical construction techniques or practices for its completion.²² The RTRP Final EIR provides specific information regarding RTRP's construction. As stated therein, SCE anticipates that it will be able to construct the foundations for the tubular steel pole (TSP) and lattice steel towers (LSTs) within a 100-foot ROW.²³ Prior to drilling for foundations, SCE or SCE's contractor would contact Underground Service Alert to identify any underground utilities in the construction zone.²⁴

Each TSP structure would require a single-drilled, poured-in-place, concrete footing that would form the structure foundation. Actual footing diameters and depths for each of the structure foundations would depend on the soil conditions and topography at each site and would be determined during final engineering.²⁵

The excavated material may be distributed at each structure site and/or used in the rehabilitation or building of access roads. Alternatively, the excavated soil may be disposed of at an off-site disposal facility in accordance with all applicable laws.²⁶

Slight to severe ground caving is anticipated along the preferred route during the drilling of the TSP foundations due to the presence of loose soils. The use of water, fluid stabilizers, drilling mud and/or casings will be made available to control ground caving and to stabilize the sidewalls from sloughing. If fluid stabilizers are utilized, the mud slurry will be added in conjunction with the drilling. The concrete for the foundation is then pumped to the bottom of the hole, displacing the mud slurry. The mud slurry brought to the surface is typically collected in a pit adjacent to the foundation and/or collected by vacuum truck to be reused or discarded at an off-site disposal facility in accordance with all applicable laws.²⁷

TSPs typically consist of multiple sections. Prior to the erection of the structure, the individual pole sections are transported on flatbed trucks from a staging yard and unloaded and placed on the

²² See generally RTRP Final EIR, Vol. 2, Section 2.5 (describing RTRP's "Project Construction and Operation").

²³ See RTRP Final EIR, Vol. 2, at 2-48 ("A 100-foot-wide easement would be required for the proposed 230 kV transmission line ROW. The easement width is dictated by requirements for maintenance and safety, and for the swing of the conductors caused by wind (sometimes referred to as blowout").

²⁴ See *id.*, at 2-81 to 2-82 (describing foundation construction).

²⁵ See *id.*, at p. 2-80 (describing "230 kV Tubular Steel Pole (TSP) Installation").

²⁶ See *id.*

²⁷ See *id.*

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ground by a crane in temporary laydown areas at each pole location. Typical laydown areas for construction and assembly of TSPs are approximately 200 feet by 100 feet. Depending on conditions at the time of construction, pole sections may come pre-configured, may be configured on the ground, or configured after pole installation with the necessary cross arms, insulators, and wire stringing hardware. A crane would be utilized to set the base section of the TSP on top of the previously prepared foundations. Once the base section is secured, the crane will set the subsequent sections of the pole into place until completed.

During construction, existing concrete supply facilities would be used where feasible. Concrete samples would be drawn at the time of the pour and tested to ensure engineered strengths were achieved. A normally specified SCE concrete mix typically takes approximately 20 working days to cure to an engineered strength. This strength is verified by controlled testing of sampled concrete. Once this strength has been achieved, crews would be permitted to commence erection of the structure.²⁸

Assembly and erection of LSTs typically require a temporary laydown area of approximately 200 feet by 200 feet. In areas where the terrain in the laydown area is reasonably low, vegetation removal may occur to prepare the site for construction. In areas where the terrain is uneven, both vegetation clearing and grading may be necessary to prepare the site for construction.²⁹

Drilling of the foundations in soft or loose soil, as well as foundations that extend below the groundwater level, may be stabilized with the use of water, fluid stabilizers, drilling mud and/or casings to keep the sidewalls from sloughing. If fluid stabilizers are utilized, the mud slurry will be added in conjunction with the drilling. The concrete for the foundation is then pumped to the bottom of the hole, displacing the mud slurry. The mud slurry brought to the surface is typically collected in a pit adjacent to the foundation and/or collected by vacuum truck to be reused or discarded at an off-site disposal facility in accordance with all applicable laws.³⁰

As with the TSP footings, concrete samples for LSTs would be drawn at time of pour and tested to ensure engineered strengths were achieved. A normally specified SCE concrete mix typically takes approximately 20 working days to cure to an engineered strength. This strength is verified by controlled testing of sampled concrete. Once this strength has been achieved, crews would be permitted to commence erection of steel.³¹

Wire-stringing for the transmission line includes all activities associated with the installation of conductors. This activity includes the installation of primary conductor and OPGW or ground wire,

²⁸ *See id.*

²⁹ *See id.*, at p. 2-81.

³⁰ *See id.*

³¹ *See id.*, at p. 2-82.

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vibration dampeners, weights, spacers, and suspension and dead-end hardware assemblies. Insulators and stringing sheaves (rollers or travelers) are attached as part of the wire-stringing activity if the work is a part of a reconductoring effort; otherwise they are typically attached during the steel erection process. Wire-stringing activities would be conducted in accordance with SCE specifications, which is similar to process methods detailed in IEEE Standard 524-2003, *Guide to the Installation of Overhead Transmission Line Conductors*. A standard wire-stringing plan includes a sequenced program of events starting with determination of wire pulls and wire pull equipment set-up positions. Advanced planning by supervision determines circuit outages, pulling times, and safety protocols needed for ensuring that safe and quick installation of wire is accomplished.³²

To ensure the safety of workers and the public, safety devices such as traveling grounds, guard structures, and radio-equipped public safety roving vehicles and linemen would be in place prior to the initiation of wire-stringing activities.³³

Since there are multiple roadway crossings along the ROW, conductor stringing operations will require installation and use of many temporary guard structures in accordance with protection and construction practices during the stringing operations. The conductors will be pulled from locations identified based on final engineering design, by skid-, trailer- or truck- mounted tensioners and pullers. The stringing work plan will be developed after final engineering, based upon mitigation measures, location constraints, and equipment limitations.

Concerning operation and maintenance activities, RTRP would be operated and maintained within the ROW void of any housing structures. The following is provided to address concerns of hazards associated with RTRP's operation adjacent to the approved residential developments.

The safety hazard for human beings can be evaluated according to the combined probability of the tower falling and of the collapsing tower touching an inhabited structure or a person. Due to the mechanical characteristics of a transmission line, it is very rare for a tower to collapse perpendicular on one side of the line because the conductor and ground wire, which are designed with higher reliability, are constraining this movement. Additionally, the probability of having a load perpendicular to the line is small. As a result, the probability of occurrence of a failure that affects structures or individuals is therefore very low.

Also, there are often signs of structural distress to a tower before a transmission structure actually collapses – which can permit preventative maintenance. As a result, the safety hazard for the public

³² See *id.*

³³ See *id.*, at p. 2-83.

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and inhabitants living around the transmission line is a fraction of the risk associated with the failure of the transmission line structure itself.

Transmission towers resist earthquake motion very well, as is demonstrated by the fact that very few towers have collapsed in the past. For example, only two towers collapsed directly due to the Northridge earthquake in 1994. No towers have collapsed during other American earthquakes in the last 30 years. Very few towers collapsed during earthquakes around the world. Reported collapses of structures have not been the result of overstress during earthquake motion. Rather, where it occurs, collapses have been caused by, for example, extreme wind loading events and/or foundation failures resulting from landslide or liquefaction.

Finally, the construction of RTRP is not expected to result in any immitigable significant impacts resulting from the accidental release of hazardous materials.³⁴ The proposed project in this area of Jurupa Valley is not located within an airport zone and is not located in the vicinity to an airstrip, private or public.³⁵ RTRP would not interfere with an emergency plan and would not increase exposure of wildfires to residents.³⁶

5. Land use impacts associated with conflicts between the proposed project transmission alignment and the approved residential developments.

The Vernola Apartment and Riverbend Projects have not been constructed and no residents are present therefore, RTRP would not divide an established community.

As explained previously, RTRP's development would preclude the development of incompatible land uses (such as residences) within the proposed 230 kV transmission ROW. However, per CPUC General Order (G.O.) 131-D, while SCE consults with local jurisdictions regarding SCE projects "local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities...."³⁷ Consistent with G.O. 131-D, RTRP would not significantly conflict with any *applicable* land use policies. Furthermore, electrical facilities are commonly sited in residential land use zones. RTRP's construction does not preclude the development of the remaining portions of the parcels proposed for development by the Riverbend or Vernola Apartment Projects. Neither will RTRP cause

³⁴ See RTRP Final EIR, Vol. 2, at 3-206 to 3-210 (with feasible mitigation, less than significant impacts from transport, use, disposal, potential accidental release, or emissions of hazardous materials, or location on hazardous material sites).

³⁵ See Attachment 1; see also RTRP Final EIR, Vol. 2, at 3-210 to 3-213

³⁶ See RTRP Final EIR, Vol. 2, at 3-210 to 3-215.

³⁷ See CPUC General Order (G.O.) 131-D, section XIV.B.

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significant impacts to any plans adopted to mitigate an environmental effect, nor would it immitigably conflict with any adopted habitat or natural community conservation plans.³⁸

To the extent that any potential land use conflicts exist, they have resulted from the Riverbend and Vernola Apartment Project's approvals without proper consideration of RTRP within their supporting CEQA documents and analyses.

6. Increased noise impacts from construction within residential subdivisions and long-term corona noise impacts on the subdivision.

The RTRP Final EIR found that neither the construction nor operation of RTRP would result in significant noise impacts.³⁹ The operation of electrical line facilities does not generate a permanent increase in ambient noise and the RTRP Final EIR determined there would be no long term impacts from corona noise.⁴⁰

While temporary construction noise would increase in the project vicinity, such construction noise would be within levels approved by the County of Riverside's noise ordinance.⁴¹ This would be consistent for the City of Jurupa Valley as the City has adopted Riverside's ordinances.⁴² This analysis included noise analysis for existing residences located as close as 50 feet of RTRP, finding no significant impact from noise or ground borne vibrations during construction.⁴³ Moreover, regarding construction activities that may occur near sensitive receptors, the RTRP Final EIR concluded that "Direct noise impacts would result from construction activities occurring adjacent to sensitive receptors, such as houses and recreation areas. However, this noise would be short-term, occurring during daylight hours when the ambient noise levels are higher within the [RTRP] area ... Work activities would be scheduled during normal work days, with no weekend or holiday construction planned; thus, no potentially significant impacts would result."⁴⁴

³⁸ See RTRP Final EIR, Vol. 2, at 3-262 to 3-265 (describing RTRP's and use impacts).

³⁹ See *id.*, at 3-281 to 3-286 (finding no or less than significant impacts associated with construction noise).

⁴⁰ See *id.*, at 3-282, 3-285 ("Although corona noise varies widely with weather conditions and may be audible, no significant corona should be produced by lines energized below 345 kV (EPRI 1987). There would neither be a substantial nor a permanent increase in noise level.").

⁴¹ See *id.*, at 3-282 - 3-285 ("Temporary construction-related noise would occur, but would be within allowable levels for temporary public facilities construction described in local plans and ordinances" and "would not represent a substantial increase in ambient noise levels...").

⁴² See City of Jurupa Valley Ordinance No. 2011-01 (An Ordinance Of The City Council Of The City Of Jurupa Valley, California Adopting All Ordinances And Resolutions Of The County Of Riverside).

⁴³ See RTRP Final EIR, Vol. 2, at 3-275 (describing noise impacts during construction of the "Proposed 230 kV Transmission Line / Wilderness / Wildlife Substations"); see [Attachment 1](#).

⁴⁴ See *id.*, at 3-294.

Additionally, with the exception of the Lyon Homes development,⁴⁵ there are currently no existing residents or homes occupying the Vernola Apartment Project, Riverbend Project, or other approved development project along RTRP's proposed project transmission line route (see Attachment 1 – List and Map of Approved Projects). Thus, RTRP's construction is not expected to expose residents of these developments to excess construction noise or ground borne vibrations in any respect. Regarding the Lyon Homes development and consistent with the RTRP Final EIR's analysis, construction activities likely to cause significant noise impacts are not expected to occur within 50 ft. of Lyon Homes' residences and therefore RTRP construction is not anticipated to cause significant noise impacts on these residences either.⁴⁶

7. Impacts from construction and operation of the proposed project on transportation and traffic considering the roads that are proposed within the approved subdivisions.

For construction, in the event that Vernola Apartment and Riverbend Projects are completed prior to RTRP, SCE may need to access the community roads in order to access tower sites. However as seven of the eight tower site locations are outside of the Riverbend and Vernola Apartment Project boundaries, access to roads within the approved subdivisions is expected to be minimal.

Operation and maintenance of RTRP would typically be completed using public roads, or access roads within the 100-foot ROW. Interior streets within the Vernola Apartment Project would not likely be used for operation and maintenance. Operation and maintenance for towers adjacent to the Riverbend Project would likely be accessed from 68th Street. Roads within the Riverbend development may be needed to access one tower location for maintenance, but such access is not expected to result in significant traffic or transportation impacts.

8. Impacts of the proposed project on Population and Housing.

The purpose and need for RTRP is to provide Riverside Public Utilities and its customers with adequate transmission capacity to serve existing and projected load, to provide for long-term system capacity for load growth, and a second interconnection point for needed system reliability. Thus, while RTRP has been proposed in response to growth within Riverside, the project itself is not expected to drive population growth or housing demand.

⁴⁵ The Proposed Project is expected to span west of the Lyon Homes at Landon Drive and Wineville Avenue, and thus avoid any displacement of homes or residents.

⁴⁶ See RTRP Final EIR, Vol. 2, at 3-275 (describing noise impacts during construction of the "Proposed 230 kV Transmission Line / Wilderness / Wildlife Substations"); see Attachment 1.

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With the exception of the Lyon Homes development,⁴⁷ there are currently no existing residents or homes occupying the Vernola Apartment Project, Riverbend Project, or other approved development projects along RTRP's proposed project transmission line route (*see Attachment 1 – List and Map of Approved Projects*). RTRP is not expected to displace substantial numbers of existing homes necessitating the construction of homes elsewhere, and is not expected to displace substantial numbers of people.

9. Cumulative impacts of the proposed project with other cumulative projects that are currently planned in the area.

As presented in *Attachment 1 (List and Map of Approved Projects)*, as of July 2015, there are nine projects in proximity to the proposed RTRP 230 kV transmission line which may, along with RTRP, have a cumulative impact on the environment. As previously noted, there are significant uncertainties presently surrounding RTRP's construction schedule and the speculative considerations involved in determining which projects in the vicinity of RTRP's transmission route may be approved, the environmental impacts those projects may engender, the phases in which such projects may be constructed, and the timeframes required for the construction of those projects. SCE notes that RTRP's construction may not overlap in any meaningful way with the construction of the projects referenced in *Attachment 1* and in such case no significant cumulative impacts would be expected from RTRP's construction.

Further, SCE notes that the only *Attachment 1* projects for which SCE has relevant environmental information are the Riverbend and Vernola Apartment Projects. Neither of those projects found immitigable significant environmental impacts.⁴⁸ SCE assumes the remaining *Attachment 1* projects would have similar environmental and cumulative impacts given the similar terrains, locations, and scopes of work (residential and commercial development) believed to be proposed for the remaining *Attachment 1* projects.

Notwithstanding these reservations, SCE presents the following cumulative impacts analysis and considerations. As described below, the cumulative impacts of RTRP and the planned projects summarized in *Attachment 1* are consistent with those impacts disclosed in the RTRP Final EIR.

⁴⁷ The Proposed Project is expected to span west of the Lyon Homes at Landon Drive and Wineville Avenue, and thus would not displace substantial numbers of homes or people, necessitating the construction of the replacement housing elsewhere.

⁴⁸ See generally Riverbend IS/MND (finding no significant, immitigable environmental impacts); Vernola Apartments IS/MND (finding no significant, immitigable environmental impacts).

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In summary, the addition of the projects listed in Attachment 1 is not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact.⁴⁹

Aesthetics: RTRP is not expected to result in a substantial cumulative aesthetic impact given Jurupa Valley's recently approved projects (*see Attachment 1* hereto) are urban in nature and electrical line facilities are not uncommon in urban settings. The RTRP Final EIR identified no designated scenic vistas in the vicinity of RTRP's proposed transmission line.⁵⁰ Additionally, existing transmission line facilities in the vicinity of the proposed transmission line "are existing visual elements that contribute to the definition of the current landscape character."⁵¹ RTRP's Final EIR does note that "there are immitigable impacts from some portions of the 230 kV route that would degrade the visual character and quality of the interface of residential, recreational, and the Santa Ana River's trails and open space uses,"⁵² as well as potential impacts on *undesigned* scenic vistas along 68th Street.⁵³ However, RTRP adopted mitigation to offset this impact to the extent feasible.⁵⁴

Moreover, even where the RTRP Final EIR concludes that RTRP may cause significant aesthetic impacts along undesignated scenic vistas (*i.e.*, related to viewsheds along the Santa Ana River riparian and trail areas), it should be noted that none of the Attachment 1 projects appear to be located within the primary focal point of those viewsheds or near the River area itself. Therefore, the cumulative effect of RTRP combined with those other projects is not expected to be substantially more impactful on any scenic vistas or viewsheds than what was previously disclosed in the RTRP Final EIR.⁵⁵

Because neither RTRP nor the recently approved projects appear to be located within designated scenic viewsheds and are not expected to significantly change the character of the existing built environment, the conclusions of RTRP's Final EIR are not expected to change. RTRP is not expected to result in a cumulatively considerable aesthetic impact,⁵⁶ and the cumulative impacts

⁴⁹ See 14 Cal. Code Regs. §§ 15162 (describing circumstances where a subsequent EIR is permissible), 15163 (describing circumstances where a supplemental EIR is permissible).

⁵⁰ See RTRP Final EIR, Vol. 2 at 3-38 to 3-39 (describing RTRP's impacts on scenic vistas).

⁵¹ See *id.*, at 3-39 to 3-40 (describing RTRP's impacts on the visual character of the surrounding areas).

⁵² See *id.*

⁵³ See *id.*, at 3-38 to 3-39 (describing RTRP's impacts on scenic vistas).

⁵⁴ See *id.*, at Table 3.2.1-2 at 3-37 to 3-38.

⁵⁵ See *id.*, at 3-38 – 3-39.

⁵⁶ See *id.*, at 4-9 ("Although this project introduces new infrastructure to viewers, such facilities are not uncommon in urban areas in order to serve the load. As such, there are no existing or planned projects within the Proposed Project's study area that would considerably add to or affect visual resources; thus, the Proposed Project's incremental effect would not be cumulatively considerable or significant").

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of RTRP and the projects listed in Attachment 1 are not anticipated to cause new significant aesthetic impacts or substantially increase the severity of a documented significant aesthetic impact.

Agricultural Resources: RTRP does not propose a change in agricultural land uses and had a less than significant impact to agricultural lands at the time of its certification (February 5, 2013). The likelihood that RTRP would incrementally contribute to a decline in acreage devoted to farmland was found to be significant and unavoidable in RTRP's Final EIR.⁵⁷ The cumulative impacts of RTRP and the planned projects summarized in Attachment 1 are expected to be consistent with the agricultural impacts disclosed in the RTRP Final EIR. The cumulative impacts of RTRP and the projects listed in Attachment 1 are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to agricultural resources.

Air Quality and Greenhouse Gas Emissions: RTRP is located in the South Coast Air Quality Management District (SCAQMD) basin which is in non-attainment status for Federal and state ambient air quality standards relating to eight-hour and one-hour ozone, particulate matter less than 10 microns, particulate matter less than 2.5 microns, nitrogen dioxide, and carbon monoxide. RTRP was found likely to result in a cumulatively considerable net increase of the aforementioned criteria pollutants for which the SCAQMD region is non-attainment.⁵⁸ "Even with application of [mitigation measures], the combined effect of construction emissions from [RTRP] and other projects' construction and/or operating emissions would be cumulatively significant at various times during construction."⁵⁹

RTRP's construction will likely take place with the SCAQMD basin still in non-attainment status. Thus, the cumulative impacts of RTRP and the planned projects summarized in Attachment 1 are expected to be consistent with the air quality impacts disclosed in the RTRP Final EIR.⁶⁰ The cumulative impacts of RTRP and the projects listed in Attachment 1 are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to air quality resources.

⁵⁷ See *id.*, at 4-9 ("...the incremental contribution of Farmland conversion associated with the Proposed Project would be a cumulatively considerable contribution to an existing significant cumulative impact. This impact would be significant and unavoidable").

⁵⁸ See *id.*, at 3-78 to 3-79 (finding that RTRP would have a "Significant Impact" for cumulatively considerable impacts from air quality criteria pollutants).

⁵⁹ See *id.*, at 3-79.

⁶⁰ See *id.*, at 4-10 to 4-11 ("...the Proposed Project's contribution to cumulative impacts as it relates to air quality would be cumulatively considerable and unavoidable").

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Biological Resources: RTRP is proposed for areas that have been heavily altered by human activity and urbanization.⁶¹ RTRP, along with the projects noted in Attachment 1, “would affect primarily disturbed, urban, and non-native habitat” and “[w]hile this habitat supports urban adapted wildlife and remnant open space supports less adapted or migratory species, overall the Proposed Project vicinity is disturbed, and biological resources native or endemic to the region have been cumulatively and significantly affected.”⁶²

However, RTRP was found to “be consistent with the [Western Riverside County Multi-Species Habitat Conservation Plan] and provide conservation habitat.”⁶³ Thus RTRP’s “cumulative impact would be less than significant because of the mitigation measures, MSHCP, and existing level of disturbance.”⁶⁴ With respect to the Riverbend and Vernola Apartment projects, pursuant to CEQA they were obligated to mitigate any documented significant biological impact to less than significant levels.⁶⁵

Therefore, while RTRP has identified biological resources impacts and would contribute to ongoing urbanization and land conversion, any such impacts are not expected to be cumulatively considerable. Thus, the cumulative impacts of RTRP and the planned projects summarized in Attachment 1 are expected to be consistent with the biological impacts disclosed in the RTRP Final EIR.⁶⁶ The cumulative impacts of RTRP and the projects listed in Attachment 1 are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to biological resources.

⁶¹ *See id.*, at 4-11 (describing project area); Attachment 1.

⁶² *See id.*

⁶³ *See id.*

⁶⁴ *See id.*

⁶⁵ *See e.g.*, Riverbend IS/MND, Section 5.4 (finding no significant, immitigable biological impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.4 (finding no significant, immitigable biological impacts would result from the Vernola Apartments).

⁶⁶ *See* RTRP Final EIR, Vol. 2, at 4-11 to 4-12 (finding a less than significant cumulative biological impacts); *see e.g.*, Riverbend IS/MND, Section 5.18 (finding no significant, immitigable cumulative environmental impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.18 (finding no significant, immitigable cumulative environmental impacts would result from the Vernola Apartments).

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Cultural Resources: RTRP is proposed in a heavily urbanized area with the proposed Attachment 1 projects which have undergone review for cultural resources.⁶⁷ Significant impacts to cultural resources are not anticipated to occur as the result of RTRP.⁶⁸

Further, consistent with the findings regarding RTRP, the Attachment 1 projects are expected to “have already complied, or will need to comply, with CEQA. Cultural resource surveys, evaluations of National Register and California Register eligibility, and other activities have likely been performed for the projects or will be performed in the future.”⁶⁹ “Impacts to cultural resources from transmission lines are more easily avoided by project redesign than impacts caused by development, pipelines, or transportation projects.”⁷⁰ “While the numbers and types of cultural resources potentially affected by [the Attachment 1] projects are unknown at this time,... construction of the RTRP would make only a small contribution to the cumulative quantitative loss of cultural resources in the project vicinity and would not be cumulatively considerable.”

The cumulative impacts of RTRP and the planned projects summarized in Attachment 1 are expected to be consistent with the cultural impacts disclosed in the RTRP Final EIR.⁷¹ The cumulative impacts of RTRP and the projects listed in Attachment 1 are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to cultural resources.

Geology and Soils: Geological impacts from RTRP and the Attachment 1 projects are not expected to be cumulatively considerable, with the possible exception of soil erosion. Erosion may be cumulatively significant if the projects collectively impacted a local waterway.⁷² However,

⁶⁷ See RTRP Final EIR, Vol. 2, Section 3.2.5; *see e.g.*, Riverbend IS/MND, Section 5.5 (finding no significant, immitigable cultural impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.5 (finding no significant, immitigable cultural impacts would result from the Vernola Apartments).

⁶⁸ See RTRP Final EIR, Vol. 2, at 3-167 to 3-169 (describing less than significant impacts with mitigation for historical, archeological, and paleontological resources).

⁶⁹ See RTRP Final EIR, Vol. 2, at 4-13; *see e.g.*, Riverbend IS/MND, Section 5.5 (finding no significant, immitigable cultural impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.5 (finding no significant, immitigable cultural impacts would result from the Vernola Apartments).

⁷⁰ See RTRP Final EIR, Vol. 2, at 4-13.

⁷¹ See RTRP Final EIR, Vol. 2, at 4-12 to 4-13 (finding a less than significant cumulative cultural impact); *see e.g.*, Riverbend IS/MND, Section 5.18 (finding no significant, immitigable cumulative environmental impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.18 (finding no significant, immitigable cumulative environmental impacts would result from the Vernola Apartments).

⁷² See RTRP Final EIR, Vol. 2, at 4-13 to 4-14 (“The Proposed and cumulative projects have or would require disturbing the soil to prepare the site and construct the projects. Cumulatively considerable impacts could occur if the projects were to be constructed at the same time, and erosion occurs during construction that creates sedimentation issues within the local watershed.”); *see e.g.*, Riverbend IS/MND, Section 5.6 (finding no significant,

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because all projects would be expected to adhere to applicable Federal and State laws and regulations regarding soil stabilization, it is not expected that RTRP's construction would result in a cumulatively considerable impact to geology and soils.⁷³ Thus, the cumulative impacts of RTRP and the planned projects summarized in Attachment 1 are expected to be consistent with the geology and soils impacts disclosed in the RTRP Final EIR.⁷⁴ The cumulative impacts of RTRP and the projects listed in Attachment 1 are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to geology and soils.

Hazards and Hazardous Materials: A cumulative effect from RTRP and the Attachment 1 projects is not likely to occur as the proposed projects in RTRP's vicinity are residential and commercial developments which are not expected to generate significant hazardous materials or waste.⁷⁵ Furthermore, neither RTRP nor the other Attachment 1 projects would be expected to result in significant hazard and hazardous materials impacts.⁷⁶

While construction activities could increase the hazard potential in the study area, because RTRP would mitigate its contribution to any potential hazards, such impacts are anticipated to be less than cumulatively considerable.⁷⁷ Therefore, the cumulative impact of the Proposed Project related to hazards and hazardous materials, in combination with the Attachment 1 projects, are anticipated to be less than significant. As such, the cumulative impacts of RTRP and the planned projects summarized in Attachment 1 are expected to be consistent with the hazard and hazardous materials

immitigable geological or soils impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.6 (finding no significant, immitigable geological or soils impacts would result from the Vernola Apartments).

⁷³ See RTRP Final EIR, Vol. 2, at 4-14 ("When viewed in the context of other projects, cumulative impacts on geology and soils as a result of the Proposed Project would be less than cumulatively considerable.").

⁷⁴ See RTRP Final EIR, Vol. 2, at 4-13 to 4-14 (finding a less than significant cumulative geology and soils impact); see e.g., Riverbend IS/MND, Section 5.18 (finding no significant, immitigable cumulative environmental impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.18 (finding no significant, immitigable cumulative environmental impacts would result from the Vernola Apartments).

⁷⁵ See RTRP Final EIR, Vol. 2, at 3-206 to 3-214 (describing no immitigable significant impacts associated with hazards or hazardous materials); see e.g., Riverbend IS/MND, Section 5.8 (finding no significant, immitigable hazards or hazardous materials impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.8 (finding no significant, immitigable hazards or hazardous materials impacts would result from the Vernola Apartments).

⁷⁶ See RTRP Final EIR, Vol. 2, at 3-206 to 3-214 (describing no immitigable significant impacts associated with hazards or hazardous materials); see e.g., Riverbend IS/MND at II-114 (project site not on hazardous materials site); Vernola Apartments IS/MND at 6-58 (project site not on hazardous materials site).

⁷⁷ See RTRP Final EIR, Vol. 2, Table 3.2.7-4 (Environmental Protection Elements – Hazards and Hazardous Materials); RTRP Final EIR, Vol. 2, at 4-14 (anticipating any cumulative hazard and hazardous materials impacts to be less than significant).

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impacts disclosed in the RTRP Final EIR.⁷⁸ The cumulative impacts of RTRP and the projects listed in Attachment 1 are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to hazards and hazardous materials resources.

Hydrology and Water Quality: While all projects are required to adhere to Federal and State requirements for hydrology and water quality, the RTRP Final EIR found that “even with integrated environmental protections, [RTRP’s water impacts] will have a cumulative effect on the watershed in which they occur as they add to the impacts of past and contemporary projects in an urban setting, and as the impacts of future projects are added to them. For this reason, cumulative impacts are considerable and unavoidable.”⁷⁹

The cumulative impacts of RTRP and the Attachment 1 projects are expected to be consistent with the hydrology and water quality impacts disclosed in the RTRP Final EIR.⁸⁰ The cumulative impacts of RTRP and the projects listed in Attachment 1 are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to hydrology and water quality resources.

Land Use: As described in RTRP’s Final EIR, a number of the Attachment 1 projects would have the potential to be constructed simultaneously with RTRP, and “thereby cause impacts resulting from temporary construction activities, including temporary increases in noise and dust, decreased air quality from construction vehicles, odors from construction equipment, safety issues, loss of vegetation, and access issues...”⁸¹ These issues were collectively analyzed within RTRP’s Final EIR.⁸² In addition, the RTRP Final EIR already disclosed “The location of the ROW within existing and planned developments could result in direct impacts where operation would preclude or impair future development activities (e.g., development-level land uses [e.g., specific plans], as well as approved tract and parcel maps and plot plans).” The potential overlap of RTRP with the Attachment 1 projects is consistent with this disclosure in the RTRP Final EIR.

With respect to the consistency of the projects with applicable land use regulations, Attachment 1 projects would not be expected to cause any significant land use impact because they would be

⁷⁸ See RTRP Final EIR, Vol. 2, at 4-14 (finding a less than significant cumulative hazard and hazardous materials impact); see e.g., Riverbend IS/MND, Section 5.18 (finding no significant, immitigable cumulative environmental impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.18 (finding no significant, immitigable cumulative environmental impacts would result from the Vernola Apartments).

⁷⁹ See RTRP Final EIR, Vol. 2, at 4-15.

⁸⁰ See *id.*, at 4-14 to 4-15 (finding cumulative hydrology impacts significant and unavoidable).

⁸¹ See *id.*, at 4-16.

⁸² See RTRP Final EIR, Vol. 2, at 4-16 and Sections 3.2.1 (Aesthetics), 3.2.3 (Air Quality and Greenhouse Gas Emissions), 3.2.4 (Biological Resources), 3.2.11 (Noise), 3.2.15 (Transportation and Traffic).

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required to be consistent with applicable land use plans, policies, or regulations.⁸³ Regarding RTRP, per G.O. 131-D, while SCE consults with local jurisdictions they “are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities....”⁸⁴ Consistent with G.O. 131-D, RTRP would not significantly conflict with any *applicable* land use policies. Furthermore, electrical facilities are commonly sited in residential land use zones. RTRP’s construction does not preclude the development of the remaining portions of the parcels proposed for development by the Riverbend or Vernola Apartment Projects. Neither will RTRP cause significant impacts to any plans adopted to mitigate an environmental effect and does not immitigably conflict with any adopted habitat or natural community conservation plans.⁸⁵

Thus, the cumulative impacts of RTRP and the Attachment 1 projects are expected to be consistent with the land use and planning impacts disclosed in the RTRP Final EIR.⁸⁶ The cumulative impacts of RTRP and the Attachment 1 projects are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to land use and planning.

Mineral Resources: As the area does not have an occurrence of mineral resources, there would be no cumulative impacts on mineral resources.⁸⁷ The cumulative impacts of RTRP and the Attachment 1 projects are expected to be consistent with mineral resource impacts disclosed in the RTRP Final EIR.⁸⁸ The cumulative impacts of RTRP and the Attachment 1 projects are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to mineral resources.

Noise: Cumulative noise impacts could occur from the construction, operation and maintenance of RTRP in combination with the Attachment 1 projects. RTRP’s Final EIR analysis examined cumulative projects to 0.25 mile from RTRP’s ROW but “construction noise was expected to merge with background noise in the existing environment [*e.g.*, traffic from adjacent roads and the I-15 freeway, *etc.*] within a few hundred feet of construction activities.”⁸⁹ Thus for Attachment 1 projects “either constructed or under construction, or are located outside of the immediate

⁸³ See Riverbend IS/MND, Section 5.10 (finding no significant, immitigable land use and planning impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.10 (finding no significant, immitigable land use and planning impacts would result from the Vernola Apartments).

⁸⁴ See CPUC General Order (G.O.) 131-D, section XIV.B.

⁸⁵ See RTRP Final EIR, Vol. 2, at 3-262 to 3-265 (describing RTRP’s and use impacts).

⁸⁶ See *id.*, at 4-15 to 4-16 (finding no cumulative land use and planning impacts).

⁸⁷ See RTRP Final EIR, Vol. 2, at 4-14 (RTRP not in a mineral resource area); see *e.g.*, Riverbend IS/MND, Section 5.11 (finding no mineral resource impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.11 (finding no mineral resource impacts would result from the Vernola Apartments).

⁸⁸ See RTRP Final EIR, Vol. 2, at 4-16 (finding no cumulative mineral resource impacts).

⁸⁹ See *id.*, at 4-16.

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construction vicinity of the Proposed Project...cumulative noise impacts from construction are unlikely to occur.”⁹⁰ Furthermore, even for those Attachment 1 projects within RTRP's immediate construction vicinity, RTRP's construction noise impacts are “expected to be short-term and localized to the particular segment under construction; [thus,] there is limited potential for those impacts to overlap with the impacts of other past, present, or probable future projects, and because of the short duration of any such overlap, cumulative impacts would not be considered cumulatively considerable or significant.”⁹¹

During operation, RTRP's Final EIR noted the “transmission lines, subtransmission lines and substations are not noisy facilities. The hum of corona noise from lines and transformers, electric pump noise, occasional thumps from circuit breakers and similar sounds generally fade into ambient noise and are not noticeable. When viewed within the context of cumulative projects in the project area, cumulative impacts related to operations are not significant. Impacts to the noise resources resulting from construction and operation of the Proposed Project would not be cumulatively considerable.”⁹²

Thus, the cumulative impacts of RTRP and the Attachment 1 projects are expected to be consistent with the cumulative noise impacts disclosed in the RTRP Final EIR.⁹³ The cumulative impacts of RTRP and the Attachment 1 projects are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant noise impact.

Population and Housing: A cumulatively considerable impact may occur if the combined projects significantly displace existing residences or split an existing community. As the proposed Attachment 1 projects are for additional housing on vacant lands, and RTRP would not displace substantial numbers of people or housing, or split an existing community, there are no anticipated cumulative impacts to population and housing from these projects.⁹⁴

⁹⁰ *See id.*

⁹¹ *See id.*

⁹² *See id.*

⁹³ *See* RTRP Final EIR, Vol. 2, at 4-14 to 4-15 (“Impacts to the noise resources resulting from construction and operation of the Proposed Project would not be cumulatively considerable”); Riverbend IS/MND, Section 5.18 (finding no significant, immitigable cumulative environmental impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.18 (finding no significant, immitigable cumulative environmental impacts would result from the Vernola Apartments).

⁹⁴ *See* RTRP Final EIR, Vol. 2, at 3-289 to 3-290, 4-17 (less than significant or no impacts on population and housing); Riverbend IS/MND, Section 5.13 (finding no significant, immitigable population and housing impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.13 (finding no significant, immitigable population and housing impacts would result from the Vernola Apartments).

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The cumulative impacts of RTRP and the Attachment 1 projects are expected to be consistent with the cumulative population and housing impacts disclosed in the RTRP Final EIR.⁹⁵ The cumulative impacts of RTRP and the Attachment 1 projects are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to population and housing.

Public Services and Utilities: RTRP would not increase the need for local public services such as police, fire department, or public education facilities.⁹⁶ Attachment 1 projects would be required to evaluate any impacts to public services under CEQA and mitigate any significant impacts to the extent feasible.⁹⁷

Similar to the findings of the RTRP Final EIR, “[i]f substantial population growth were to occur prior to the public service and utilities infrastructure improvements proposed by RTRP, significant effects to existing public facilities and systems could result.”⁹⁸ However, “impacts to public services and systems from [RTRP] would generally occur only during the projected temporary construction period ... and would be less than significant.”⁹⁹

The cumulative impacts of RTRP and the Attachment 1 projects are expected to be consistent with the cumulative public services impacts disclosed in the RTRP Final EIR.¹⁰⁰ The cumulative impacts of RTRP and the Attachment 1 projects are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to public services.

⁹⁵ See RTRP Final EIR, Vol. 2, at 4-17 (“...no significant impacts to population and housing would occur, and the Proposed Project would not have a cumulatively considerable impact”); Riverbend IS/MND, Section 5.18 (finding no significant, immitigable cumulative environmental impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.18 (finding no significant, immitigable cumulative environmental impacts would result from the Vernola Apartments).

⁹⁶ See RTRP Final EIR, Vol. 2, at 3-300 to 3-306, 4-18 (less than significant or no impacts to public services and utilities).

⁹⁷ See e.g., Riverbend IS/MND, Section 5.14 (finding less than significant impacts to public services would result from Riverbend); Vernola Apartments IS/MND, Section 6.14 (finding less than significant impacts to public services would result from the Vernola Apartments).

⁹⁸ See RTRP Final EIR, Vol. 2, at 4-18.

⁹⁹ See *id.*

¹⁰⁰ See RTRP Final EIR, Vol. 2, at 4-18 (RTRP “would not have a cumulatively considerable impact on public services or utilities systems in the Proposed Project area”); Riverbend IS/MND, Section 5.18 (finding no significant, immitigable cumulative environmental impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.18 (finding no significant, immitigable cumulative environmental impacts would result from the Vernola Apartments).

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Recreation: RTRP “would not result in a substantial increase in demand for recreational facilities such that substantial physical deterioration of the existing facilities would occur or be accelerated.”¹⁰¹ Implementation of the Attachment 1 projects may increase demand on existing recreational facilities and/or result in the need for new recreational facilities within RTRP’s vicinity. As explained in the RTRP Final EIR however, “since [RTRP] would not have an individual incremental impact on demand for recreational facilities once construction is complete, it would not contribute to cumulative demand associated with other reasonably foreseeable projects.”¹⁰² Similarly, while “[t]here are a number of [Attachment 1] projects within the vicinity of the Hidden Valley Wildlife Area and Goose Creek Golf Course; however, none of these projects would actually be constructed in the wildlife area or golf course and would therefore not impact operation of these areas. Since there are no reasonably foreseeable projects that would impact the wildlife area and golf course simultaneously with construction of [RTRP], short term impacts associated with the proposed 230 kV transmission line would not be cumulatively considerable and cumulative impacts would be less than significant.”¹⁰³

The cumulative impacts of RTRP and the Attachment 1 projects are expected to be consistent with the cumulative recreation impacts disclosed in the RTRP Final EIR, in particular because none of the Attachment 1 projects would interfere with the Hidden Valley Wildlife Area or Goose Creek Golf Course.¹⁰⁴ The cumulative impacts of RTRP and the Attachment 1 projects are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to recreation resources.

Transportation and Traffic:

Cumulative impacts would occur if RTRP and the Attachment 1 projects “would create impacts resulting in a permanent reduction of capacity (Level of Service) on the area roadways or result in changes to air traffic routes of airports.”¹⁰⁵ RTRP’s operations are “not anticipated to generate substantial vehicle traffic as to exceed City of Riverside and Riverside County Level of Service

¹⁰¹ See RTRP Final EIR, Vol. 2, at 3-320 to 3-323, 4-18 (with mitigation, less than significant impacts to recreation resources).

¹⁰² See RTRP Final EIR, Vol. 2, at 4-18.

¹⁰³ See *id.*

¹⁰⁴ See RTRP Final EIR, Vol. 2, at 4-18 (RTRP “would not have a cumulatively considerable impact on public services or utilities systems in the Proposed Project area”); Riverbend IS/MND, Section 5.18 (finding no significant, immitigable cumulative environmental impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.18 (finding no significant, immitigable cumulative environmental impacts would result from the Vernola Apartments).

¹⁰⁵ See RTRP Final EIR, Vol. 2, at 4-19.

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standards.”¹⁰⁶ Attachment 1 projects would similarly be required to evaluate any impacts to traffic and transportation under CEQA and mitigate any significant impacts to the extent feasible.¹⁰⁷

Furthermore, RTRP's operational impacts to traffic and transportation will be *de-minimus* and not expected to be cumulatively considerable.¹⁰⁸ Despite generating significantly greater amounts of operational traffic,¹⁰⁹ Riverbend and Vernola Apartment Projects' impacts on traffic and transportation in the vicinity of RTRP's 230 kV transmission line were found to be less than significant with mitigation.¹¹⁰ SCE has challenged the Vernola Apartment Project approvals on this point, particularly because the apartment project would contribute 2,640 daily automobile trips alone. This number itself should be cumulatively considerable given the local area and the other Attachment 1 projects.

Also, RTRP “is not anticipated to require modifications to air traffic routes of Flabob Airport or Riverside Municipal Airport, although consultation with the airport ownership will occur during the design phase to ensure compatibility with airport operations.”¹¹¹ Again, Attachment 1 projects would be required to evaluate any impacts to air traffic routes under CEQA and mitigate any significant impacts to the extent feasible.¹¹²

¹⁰⁶ See RTRP Final EIR, Vol. 2, at 3-337 to 3-345, 4-19 (with mitigation, less than significant or no traffic impacts from RTRP).

¹⁰⁷ See e.g., Riverbend IS/MND, Section 5.16 (finding less than significant impacts with mitigation to traffic and transportation would result from Riverbend); Vernola Apartments IS/MND, Section 6.16 (finding less than significant impacts with mitigation to traffic and transportation would result from the Vernola Apartments).

¹⁰⁸ See RTRP Final EIR, Vol. 2, at 3-340 (“Operation and maintenance of the Proposed Project, including the 69 kV subtransmission lines, 230 kV transmission line and substations, would not conflict with the CMP as these activities would involve only service vehicles to perform routine maintenance or respond to an emergency. Given the intermittent nature of operations and maintenance activities, trips by service vehicles would be expected to occur on the order of several times per year, but could be more frequent during emergencies.”).

¹⁰⁹ See Riverbend IS/MND at II-155 (“The land uses proposed by the Project are estimated to produce an estimated 4,476 daily vehicle trips, including 352 trips during the AM Peak Hour and 473 trips during the PM Peak Hour.”); Vernola Apartments IS/MND at 6-105 (“The land uses proposed by the Project are estimated to produce an estimated 2,640 daily vehicle trips, including 202 trips during the AM Peak Hour and 246 trips during the PM Peak Hour.”).

¹¹⁰ See Riverbend IS/MND at II-153, 155 (“The land uses proposed by the Project are estimated to produce an estimated 4,476 daily vehicle trips, including 352 trips during the AM Peak Hour and 473 trips during the PM Peak Hour.”).

¹¹¹ See RTRP Final EIR, Vol. 2, at 3-342 to 3-343, 4-19 (less than significant impact to air traffic).

¹¹² See e.g., Riverbend IS/MND, Section 5.16(c) (finding no impact); Vernola Apartments IS/MND, Section 6.16(c) (finding no impact).

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Per the RTRP Final EIR, temporary traffic impacts are not cumulatively considerable or significant.¹¹³ Notwithstanding the RTRP Final EIR's stated threshold of significance, in theory, construction of RTRP could result in temporarily increased traffic impacts if RTRP and Attachment 1 projects are under construction simultaneously. As previously noted, because there are significant uncertainties presently surrounding the construction schedules of RTRP and any Attachment 1 projects, any attempts to forecast future, temporary construction impacts from construction traffic would be speculative.

The cumulative impacts of RTRP and the Attachment 1 projects are expected to be consistent with the cumulative transportation and traffic impacts disclosed in the RTRP Final EIR.¹¹⁴ The cumulative impacts of RTRP and the Attachment 1 projects are not anticipated to cause new significant impacts or substantially increase the severity of a documented significant impact to transportation and traffic resources.

¹¹³ See RTRP Final EIR, Vol. 2, at 4-19 (finding that significant cumulative impact would occur only if a permanent reduction of capacity would occur).

¹¹⁴ See RTRP Final EIR, Vol. 2, at 4-19 (RTRP "would not have a cumulatively considerable impact on transportation infrastructure and air traffic patterns"); Riverbend IS/MND, Section 5.18 (finding no significant, immitigable cumulative environmental impacts would result from Riverbend); Vernola Apartments IS/MND, Section 6.18 (finding no significant, immitigable cumulative environmental impacts would result from the Vernola Apartments).

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QUESTION 3 - CEQA requires consideration of alternatives that are capable of substantially reducing or eliminating significant environmental effects. CEQA Guidelines Section 15126.6(a). Define alternatives that meet the project objectives and reduce or avoid potentially significant impacts of the proposed project on the approved Riverbend housing project and Vernola Marketplace Apartment Community. This may include local routing alternatives or electrical system alternatives.

CEQA Guidelines (Section 15126.6) states the alternatives that are required to be considered are ones "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..."

The following objectives were developed in support of the Proposed Project Purpose and Need.¹¹⁵

- Provide sufficient capacity, in a timely manner, to meet existing electric system demand and anticipated future load growth;
- Provide an additional point of delivery for bulk power into the RPU electrical system, thereby reducing dependence on Vista Substation and increasing overall reliability
- Split and upgrade the subtransmission electrical system as a function of prudent utility practice;
- Meet Proposed Project need while minimizing environmental impacts: and
- Meet Proposed Project need in a cost-effective manner.

The alternatives described herein do not include routing or siting alternatives for the 69 kV subtransmission construction work being performed by the Riverside Public Utilities (RPU). In addition, due to RPU's requirement for an additional point of delivery for bulk power into the RPU electrical system,¹¹⁶ electrical system alternatives were not considered.

In response to this question, please find:

- *Siting Report - Alternative Segment Re-route Feasibility Study* (July 2015) (Attachment 5 herein); and
- *Underground Alternatives Desktop Study* (July 2015) (Attachment 6 herein).

The purpose of the Siting Report is to:

- Explore potential segment re-routes in the vicinity of the Riverbend, Vernola Apartment, and other projects.

¹¹⁵ RTRP Final EIR, Vol. 2, Section 6.1.1. (Objectives), p. 6-1.

¹¹⁶ See RTRP Final EIR, Vol. 2, Section 6.2.1. (230 kV Transmission Line Routes... "CAISO ... granted its approval for the Proposed Project presented to them as 'Option I-Loop the existing Mira Loma-Vista #1 230 kV line by building 8.25 miles of new 230 kV double circuit transmission line from the existing Mira Lorna-Vista #1 [transmission line right-of-way] to into a new 230 kV SCE interconnection facility with RPU's new Jurupa Substation in Riverside' (Note: The "Jurupa Substation" was renamed the Wilderness and Wildlife substations.)").

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- Identify and evaluate potential environmental, economic, legal, social, technological, or other issues affecting the potential above-ground RTRP routing options.

The purpose of the Underground Alternatives Desktop Study is to study the feasibility of constructing a significant portion of RTRP's proposed 230 kV Transmission Line (T/L) using underground methods. This study anticipates that the CPUC will consider underground recommendations suggested in several protests submitted by neighboring developments with respect to SCE's CPCN Application. Note, costs for the alternatives routes identified in the Underground Alternatives Desktop Study are currently being developed and will be presented upon completion.

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QUESTION 4 - "Provide the total volume of water that will be required for construction of the project. The City of Riverside Final EIR and response to comments state that a maximum of 40,000 gallons of water would be applied per mile per day. This volume of water does not equate to a total volume required for the project. Specify a total maximum volume of water needed for the project and the source of water."

The successful bidder for construction of RTRP would be required to procure agreements for water to be used during construction, therefore the source of water is not yet identified. The RTRP Final EIR identifies approximately 40,000 gallons of water would be used per day for SCE's construction of the 230 kV component of RTRP. The total estimated days for construction is 312 days which result in a total estimated water consumption of 12,480,000 gallons of water during construction.

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QUESTION 5 – “Define the proposed location for disposal of hazardous waste and treated wood poles that would be removed by the proposed project.”

The successful bidder for construction of RTRP will be required to dispose of any hazardous materials and treated poles at approved disposal facilities in compliance with applicable law.