3.2 PUBLIC AGENCIES AND TRIBAL GOVERNMENTS

This section contains responses to comments received from tribal governments and public agencies. Comments are presented in the order they were received. Responses follow each comment letter.

Comment Letter A1

Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

April 26, 2018

Mr. Jensen Uchida
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
riversidetrp@panoramaenv.com

DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT (SEIR) FOR RIVERSIDE TRANSMISSION RELIABILITY PROJECT (CALIFORNIA PUBLIC UTILITIES COMMISSION), LOCATED AT THE CITIES OF JURUPA VALLEY, NORCO & RIVERSIDE, RIVERSIDE COUNTY (SCH# 2007011113)

Dear Mr. Uchida:

The Department of Toxic Substances Control (DTSC) has reviewed the subject EIR/EA. The following project description is stated in the EIREA: "Southern California Edison (SCE; the Applicant), a regulated California utility, filed an application (A.15-04-013) for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) to construct and operate the Riverside Transmission Reliability Project (RTRP)." The SEIR further states, "The Proposed Project is a component of the larger RTRP that was jointly planned by SCE and Riverside Public Utilities (RPU). The RTRP includes components that would be owned and operated separately by RPU and SCE. RPU would construct, own, operate, and maintain certain elements of the RTRP, including the new 69-kilovolt (kV) Wilderness Substation, 69-kV subtransmission lines, and interconnection and telecommunication facilities. The City of Riverside analyzed the RTRP in an EIR finalized in 2013."

Based on the review of the submitted document, DTSC has the following comments:

1. The SEIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions. A1-1

2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction. A1-2

3. If planned activities include building modifications/demolitions, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be investigated and mitigated/disposed of in accordance with all applicable and relevant laws and regulations. In addition, evaluate whether polychlorinated biphenyls (PCBs) containing materials is present in onsite buildings and address as necessary to protect human health and the environment. A1-3

4. The SEIR states, "Alternative 3 involves construction within an active agriculture field." If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides. A1-4

5. DTSC recommends evaluation, proper investigation and mitigation, if necessary, of onsite areas with current or historic PCB-containing transformers. A1-5

6. Aerially deposited lead (ADL) is generally encountered in unpaved or formerly unpaved areas adjoining older roads, primarily as a result of deposition from historical vehicle emissions when gasoline contained lead. As the project site is adjacent to I-15 Freeway, this issue should be addressed in accordance with all applicable and relevant laws and regulations. A1-6

7. If the project development involves soil export/import, proper evaluation is required. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if imported soil was used as backfill onsite and/or backfill soil will be imported, DTSC recommends proper evaluation/sampling as necessary to ensure the backfill material is free of contamination. A1-7

8. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the SEIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight. A1-8

If you have any questions regarding this letter, please contact me at (714) 484-5380 or by email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,

Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program – Cypress

kl/sh/ja

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Schools Evaluation and Brownfields Cleanup
Brownfields and Environmental Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2007011113

3.2.1 Response to Letter A1: Abraham, Johnson – Department of Toxic Substances Control

A1-1 Analysis under CEQA requires assessment of whether a project would be located on a hazardous material site, as defined under the California Government Code § 65962.5. A regulatory database search, referred to in the certified 2013 RTRP EIR as a Limited Phase I Environmental Site Assessment (ESA) and Hazardous Materials Database Records Search, was conducted by TrackInfo Services, LLC on May 8, 2008. The records search process identified potential environmental contamination issues that may be associated with known hazardous material storage sites, use locations, and/or illicit release sites within a 0.5-mile search radius along the RTRP planned route. The analysis showed that the potential for impacts related to hazards and hazardous materials would be very low due to the relatively non-invasive nature of the construction of a transmission line across a property. Findings from the regulatory agency databases search can be found in Table 3.2.7-1 of the certified 2013 RTRP EIR. A second environmental database search was conducted in 2015 by Environmental Data Resources, Inc. (EDR) and FirstSearch databases, to support the CPUC's review of the CPCN application for the RTRP. The 2015 database search included any existing hazardous sites within 0.25 mile of the proposed 2013 alignment, which encompassed the Revised Project components (EDR, 2015). A 0.25-mile buffer is a typical distance used to identify the presence of contaminants in off-site groundwater that may have the potential to migrate to a given site. The search drew from federal and state environmental data tracking sites that provide site records of hazardous material handling or releases to the environment. The full database review and sources can be found in the EDR 2015 RTRP Hazardous Materials Database Records Search Update and Review Report (EDR 2015). In March and May of 2018, the following federal and state databases were reviewed:

- USEPA National Priorities List (USEPA, 2018)
- California Department of Toxic Substances Control (DTSC) sites (Envirostor and Hazardous Waste and Substances Site List) (DTSC, 2018a; DTSC, 2018b)
- Leaking Underground Storage Tank, Department of Defense, and Site Cleanup Program Sites (Geotracker database) (SWRCB, 2018)

No existing hazardous sites within 0.25 mile of the Revised Projected components were identified based on these records searches.

Distribution Line Relocation #7 would be located on a 92-acre Voluntary Cleanup site known as the Riverside Agricultural Park located at 7020 Crest Avenue. The site historically had a sewage treatment plant containment apparatus that was punctured releasing contaminated digester sludge. Contaminants of concern associated with the site are polychlorinated biphenyls (PCBs), dioxins, and other

inorganic compounds (SWRCB, 2018; DTSC, 2018b). Between April and July 2009, the Friends of Riverside Airport completed the first phase of a DTSC-approved Revised Response Plan, which included the excavation, removal, and proper disposal of soils containing PCB concentrations in excess of 50 milligrams per kilogram (mg/kg) from locations determined by previous site investigation efforts. At the time the certified 2013 RTRP EIR was prepared, the second and final phase of the Revised Response Plan was scheduled to be complete. Since the certification of 2013 RTRP EIR, DTSC conducted a site visit and determined that the objectives of the remedial effort detailed in the Soil Excavation Work Plan have been met and no additional excavation or monitoring of the site is needed (DTSC, 2018).

The records searches in conjunction with the Initial Study Checklist for the Revised Project (CPUC, 2017) verified that the analysis conducted in the certified 2013 RTRP EIR adequately assessed the impacts that could occur during construction and identified appropriate mitigation measures to reduce any impacts. An analysis of existing hazardous materials was therefore focused out of the Subsequent EIR because there would be no new significant effects of the Revised Project, and the impacts of the Revised Project would not be substantially different from the effects described in the certified 2013 RTRP EIR.

A1-2 Distribution Line Relocation #7 (see Figure 1.2-3 of the Subsequent EIR) would be located in the vicinity of the once contaminated Riverside Agricultural Park. The USEPA determined that no further action is needed for this contaminated site cleanup; however, DTSC is still in the process of reviewing the cleanup completion report (Tasnif-Abbasi, 2018). For more information regarding this hazardous site, refer to response A1-1 above.

In terms of the wider context of the project, construction of the Revised Project is anticipated to be consistent with the analysis identified in the certified 2013 RTRP EIR. The certified 2013 RTRP EIR analyzed the distribution line relocations, including Distribution Line Relocation #7. The certified 2013 RTRP EIR analysis identified that construction of the RTRP, including the distribution line relocations, would occur following cleanup of this hazardous site. Proposed Project construction is now scheduled to begin in 2021. Implementation of EPE HAZ-02, MM HAZ-01, and MM HAZ-02 (refer to Section 3.2.7 of the certified 2013 RTRP EIR) would reduce or avoid the impact from contaminated soils or other materials, if encountered. EPE HAZ-02 requires the preparation of and compliance with a Soils Management Plan, which includes soil testing. MM HAZ-01 and MM HAZ-02 require the sampling, testing, documentation, and reporting of any soil or groundwater contamination that is suspected, or has the potential to be contaminated. An SCE/RPU approved Health and Safety Officer reviews the results. If contamination is confirmed, the Health and Safety Officer coordinates with the appropriate regulatory agency to determine the

level of worker protection and protocol for handling and disposal of specific hazardous materials. The EPEs and MMs address the protocol to be implemented when environmental conditions are suspected of being contaminated, such as at Riverside Agricultural Park.

A1-3 The Revised Project construction activities would not involve modifications or demolition of buildings that could contain lead-based paints or products, mercury, asbestos containing materials, or PCBs.

A1-4 Alternative 1, which avoids the agricultural land, is the Environmentally Superior Alternative. The Revised Project and Alternative 3, if selected by the CPUC, would involve construction within an active agriculture field. Impacts related to existing hazardous materials sites were analyzed in the certified 2013 RTRP EIR and were not reanalyzed in the Subsequent EIR because no new or significantly greater impact would occur, and no new hazardous site that was not previously analyzed was identified (refer to the Initial Study Checklist in Appendix B of this Subsequent EIR). As analyzed in Section 3.2.7 of the certified 2013 RTRP EIR, SCE would prepare a Soil Management Plan per EPE HAZ-02 and implement MM HAZ-01 (appoint trained personnel for sampling) and MM HAZ-02 (encountering unknown contamination) to quantify and document the level of contaminant, including pesticides. The Health and Safety Plan would address any special handling procedures to minimize risk from contamination to workers during construction (Section 4.7, EPE HAZ-01). All soil that is determined to be contaminated would be disposed of at an appropriately permitted landfill, in accordance with state law. EPE HAZ-02 notes that soil would be disposed of in accordance with the recommendations identified in the Soil Management Plan, dependent upon the results of testing. The third paragraph under Section 4.11.8: Revised Project Impact Analysis of the Draft Subsequent EIR has been revised to clarify the disposal requirements for all contaminated soil encountered on-site, as follows:

> SCE would implement EPE UTIL-01, which specifies the handling of construction waste materials. All recyclable construction materials that are nonhazardous would be transported to a nonhazardous recycling facility or retained by SCE for use on other projects. All solid waste generated would be collected at designated locations along the transmission alignment and at Marshalling Yard. All nonhazardous waste would ultimately be transported to the Badlands Sanitary Landfill, the El Sobrante Landfill, Lamb Canyon Sanitary Landfill, or other regional landfills for proper disposal. These landfills have sufficient capacity (Table 4.11-3) to accommodate the amount of waste that would be generated during construction. Should contaminated soil be encountered during construction activities, it shall be

disposed of at an appropriately permitted landfill, in accordance with state law. ***Impacts on landfills during construction would be less than significant. No mitigation is required.***

A1-5 No PCB-containing transformers are known to occur in the areas where ground-disturbing activities are proposed. While transformer oil has historically contained substances of concern such as PCBs, petroleum hydrocarbons, and lead, no transformers would be installed as part of the Revised Project. Evaluation and investigation of PCB-containing transformers is not necessary.

A1-6 As stated in response A1-4, impacts related to existing hazardous materials sites were adequately analyzed in the certified 2013 RTRP EIR and were not reanalyzed in the Subsequent EIR. Any aerially deposited lead (ADL) present within soils in the agricultural field that borders I-15 would be identified through soil testing, as required by EPE HAZ-02, MM HAZ-01, and MM HAZ-02(refer to Section 3.7.2 of the certified 2013 RTRP EIR).

A1-7 The requirements of several EPEs and MMs would be implemented if soil or groundwater contamination is suspected during construction of the Revised Project. EPE HAZ-02 (Construction Site Soil Management) (refer to Section 3.7.2 of the certified 2013 RTRP EIR) provides guidance for the proper handling, on-site management, and disposal of impacted soil that might be encountered during construction activities. MM HAZ-01 and MM HAZ-02 (refer to Section 3.7.2 of the certified 2013 RTRP EIR) require: construction activities to cease if evidence of soil or groundwater contamination is detected; a report documenting the exact contamination location; laboratory testing; and implementation of recommended protection and disposal measures. For more details regarding these EPEs and MMs, refer to the response A1-2 or the descriptions on page 3-205 of the 2013 RTRP EIR.

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Comment Letter A2

Joint Project Review 12-07-16-01 Riverside Transmission Reliability Project

Pert, Heather@Wildlife <Heather.Pert@wildlife.ca.gov> Tue, May 15, 2018 at 11:56 AM
To: "GRHanson@riversideca.gov" <GRHanson@riversideca.gov>, "riversidetrp@panoramaenv.com" <riversidetrp@panoramaenv.com>, "ddarnell@riversideca.gov" <ddarnell@riversideca.gov>
Cc: Karin Cleary-Rose <karin_cleary-rose@fws.gov>, Laurie Correa <LDCORREA@wrcrca.org>, "Kelleher, Sean" <SKelleher@riversideca.gov>

Hello All,

The Riverside Transmission Reliability Project line was reviewed under JPR 12-07-16-01 as a City of Riverside Public Utility project. The Subsequent DEIR for this project identifies some changes to the alignment that are within Criteria Cells for the Western Riverside County Multiple Species Habitat Conservation Plan and so we request that the City of Riverside submit an addendum to the JPR, including a DBESP for riparian\riverine impacts. Original Wildlife Agency comments on the JPR 12-07-16-01 are in the email below. I may not have the appropriate contacts so please feel free to forward this to staff working on this project. A2-1

Sincerely,
Heather Pert

Heather A. Pert, PhD
Senior Environmental Scientist
Inland Deserts Region
California Department of Fish and Wildlife
3602 Inland Empire Blvd
Ontario, CA 91764-4918
858-395-9692

>>> <Noelle_Ronan@fws.gov> 11/21/2012 12:58:56 PM >>>

Mr. Hanson,

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the Joint Project Review (JPR) 12-07-16-01, received on November 2, 2012. On November 11, 2012, the Wildlife Agencies contacted George Hanson, Riverside Public Utilities (RPU), to request an extension for review of the JPR. An extension to November 21, 2012 was granted via electronic correspondence on November 15, 2012. In accordance with the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP), the Wildlife Agencies are providing these comments in response to the consistency determination for the above referenced project.

* Section 6.1.2 Riparian/Riverine/Vernal Pool

Power Engineers on behalf of RPU identified all riparian and riverine areas as being avoided by the project through the placement of transmission lines, access roads, and other structures outside of riparian/riverine areas. The Wildlife Agencies appreciate all efforts to avoid impacts to riparian/riverine resources. However, on Figure 3, page 20 of the MSHCP Consistency Analysis, a proposed new access road appears to cross through mapped southern cottonwood/willow riparian habitat.
Please clarify if this area qualifies as MSHCP riparian/riverine habitat.
If the proposed new access road is crossing MSHCP riparian/riverine habitat, a Determination of Biologically Equivalent or Superior Preservation (DBESP) would be required.

The MSHCP Consistency Analysis states that no transmission support structures, telecommunications conduits, access roads, or laydown areas would impact riparian/riverine habitat. However, Table 2 indicates that the project will result in permanent and temporary impacts to Riversidean alluvial fan sage scrub which is defined as a riparian habitat in the MSHCP. Please note that a riparian/riverine DBESP for riparian/riverine impacts would be required if there are impacts to Riversidean alluvial fan sage scrub.

* 6.1.6 (Mitigation Responsibilities), 7.2.4 (Future Facilities with

Public/Quasi-Public Lands) and 7.3.9 (Future Facilities)

RPU states in the JPR and MSHCP Consistency Analysis that the utility construction is an identified activity but not a "Covered" activity of the MSHCP. However, future facilities (such as this project) that are carried out by a Permittee (such as the City of Riverside) are considered Covered Activities (Section 7.3.9). A portion of the project crosses through the Hidden Valley Wildlife Area (a Department-owned property) but the project applicant has not coordinated with the Department to discuss the project and potential effects on the Hidden Valley Wildlife Area. The final project alignment and placement of the proposed access roads and spur roads should be discussed with the Department.

RPU proposes to submit a Certificate of Inclusion per MSHCP Section 7.2.4 which should include an equivalency analysis providing specific mitigation and compensation for lost conservation values, with conditions prior to facility implementation. In addition, RPU proposes to use the Conversion Process under the Land and Water Conservation Funds (LWCF) in coordination with California State Parks and the National Parks Service to address portions of the project that span the Hidden Valley Wildlife Area and Santa Ana River. The Department should be included in the LWCF coordination effort for the Hidden Valley Wildlife Area. RPU should follow the process for mitigation and/or contribution to Reserve Assembly for future facilities as described in MSHCP Section 6.1.6.

* Section 6.1.3. Narrow Endemic Plant Species Survey Area

The Wildlife Agencies concur with the RCA that the Final Environmental Impact Report (EIR) must include Mitigation Measures to ensure focused surveys are conducted for Narrow Endemic Plant Species within the project footprint once the final alignments for the project are determined. If Narrow Endemic Plant species are found they should be avoided or, if unavoidable, then a DBESP should be submitted.

* Section 6.3.2 Additional Survey Area - Burrowing Owls

The Wildlife Agencies concur with the RCA that the Final EIR must include Mitigation Measures requiring focused breeding season surveys, pre-construction surveys, 100 percent avoidance, and a DBESP, if necessary, for burrowing owls.

* Nesting Birds

The Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 et seq.) protects migratory birds and their nests, eggs, young, and parts from possession, sale, purchase, barter, transport, import, and export, and take. Furthermore, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code (FGC) prohibit the take of all birds and their nests, including raptors. We recommend avoiding construction activities during the nesting season (February 1 through September 15) along the entire project alignment. However, construction outside the breeding season may not be feasible. There are measures that can be taken to avoid impacts to nesting birds that include, but are not limited to, relocation of the access roads, construction of noise barriers, minimizing heavy equipment and general construction traffic on the access road, limiting helicopter use around nesting birds, implementing nest buffers to include 300 feet for passerines and 500 feet for raptors, and biological monitoring. We recommend that a biological monitor be present to monitor the effects of construction on any active nests and to ensure that there is no encroachment into the buffer zone. The project proponents indicated that project biologist may visit a site once a week or periodically, however this interval may not be adequate. The Wildlife Agencies recommend daily site visits to avoid and minimize impacts to nesting birds.

We appreciate the opportunity to comment on the JPR. If you have any question please contact Heather Pert, with the Department, or Noelle Ronan, with the Service.

Sincerely,

Noelle Ronan and Heather Pert

Noelle Ronan
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Palm Springs Fish and Wildlife Office
777 E. Tahquitz Canyon Way, Suite 208
Palm Springs, CA 92262
760-322-2070 ext. 215

Heather A. Pert, PhD
Inland Desert Region, R6
Staff Environmental Scientist
Calif. Department of Fish and Game

3.2.2 Response to Letter A2: Pert, Heather – California Department of Fish and Wildlife

A2-1 Elements of the RTRP that would be constructed by SCE are addressed in the Subsequent EIR. Subsequent EIR MM BIO-15 specifically requires SCE to prepare a Determination of a Biologically Equivalent or Superior Preservation (DBESP). The commenter requests the City of Riverside submit an addendum to the Joint Project Review (JPR) 12-07-16-01, including a DBESP for riparian/riverine impacts. RPU, as a permittee under the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), would ensure compliance with the MSHCP for the entire RTRP on behalf of SCE. MM BIO-01, MM BIO-01A, and MM BIO-15 lay out the roles and responsibilities of RPU and SCE, and demonstrate the requirements for compliance with the MSHCP. MM BIO-15 of the Subsequent EIR specifically requires SCE to prepare a Determination of a Biologically Equivalent or Superior Preservation (DBESP).

Comment Letter A3

ORA

Office of Ratepayer Advocates
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, California 94102
Tel: 415-703-2381
Fax: (415) 703-2057

http://ora.ca.gov

May 17, 2018

Riverside Transmission Reliability Project
c/o Panorama Environmental, Inc.
717 Market Street
San Francisco, CA 94103

Subject: Office of Ratepayer Advocates Comments on the Draft Subsequent Environmental Impact Report (DSEIR), SCH Nos. 200701113, Regarding 230 kiloVolt (kV) Substation Options for the Riverside Transmission Reliability Project. Application (A.) 15-04-013.

Background

On April 2, 2018, the California Public Utilities Commission's (Commission) Energy Division issued a Draft Subsequent Environmental Impact Report (DSEIR) for Southern California Edison Company's (SCE) Riverside Transmission Reliability Project (RTRP), for which SCE seeks a Certificate of Public Convenience and Necessity (CPCN) in A.15-04-013. The Energy Division staff requests comments to the DSEIR by May 17, 2018. Therefore, these comments are timely submitted. The Office of Ratepayer Advocates (ORA) offers the following comments on the DSEIR for consideration.

The DSEIR evaluated thirty alternative projects[1] to SCE's Proposed Project,[2] including ORA's proposed Alternative 26.[3] (See Figure 1) Alternative 26 involves modifying SCE's proposed 66 kiloVolt (kV) Circle City Substation Project and constructing new 115 kV and 230 kV transmission lines to replace a number of SCE projects.[4] This alternative would construct the Circle City Substation as a 230/115/66 kV Substation, and interconnect it to the Mira Loma Substation in the City of Ontario, with approximately 11 miles of 230 kV lines, using existing and some new rights of way (ROW). Approximately 27 (17 +10) miles[5] of 115 kV line along I-15 freeway would be constructed to connect Ivyglen and Fogarty 115 kV Substations to the new Circle City 230 kV Substation. The Circle City Substation would then supply power to the Corona, Pedley, Data Bank, Chase, Jefferson, Cleargen,

[1] DSEIR, p. 3-8.
[2] DSEIR, p. 2-1.
[3] DSEIR, p. 3-44.
[4] SCE's Proposed 230 kV Wildlife Substation in SCE's service area in the City of Riverside and the Riverside Public Utilities' (RPU) 66 kV Wilderness Substation in RPU's service area in the City of Riverside.
[5] See Figure 1: Proposed 115kV transmission lines to connect Circle City to Ivyglen and Circle City to Fogarty Substations.

and Delgen Substations, as well as provide power to some of the Riverside Public Utilities' (RPU) load. The new Circle City 230 kV Substation would also supply power to the Ivyglen and Fogarty Substations.[6]

The DSEIR concludes that Alternative 26 should be rejected because Alternative 26 does not meet the basic project objectives, does not meet the regulatory feasibility criteria, and does not reduce environmental impacts.[7]

On April 4, 2018, Administrative Law Judge Yacknin issued a Proposed Decision (PD) to approve SCE's Petition to Construct Valley-Ivyglen 115 kV Subtransmission Line Project (Ivyglen, A. 07-04-028) and to deny SCE's application for a CPCN to construct the Alberhill System Project (Alberhill, A.09-09-022). If this PD (approving Valley-Ivyglen project) is adopted by the Commission, there would not be a need to construct the 27 mile 115 kV transmission line to connect ORA's proposed Circle City 230 kV Substation to Ivyglen and Fogarty Substations. Instead, the Ivyglen Substation, when constructed, would sufficiently supply power to the Valley South system.

Based on this new information, Alternative 26 should be modified (Modified Alternative 26)[8] to eliminate the need to construct the 27 mile 115kV transmission line. (See Figure 2) ORA's Modified Alternative 26 would construct the Circle City Substation as a 230/66 kV Substation instead of constructing SCE's proposed 66 kV Substation. The Circle City Substation would interconnect to the Mira Loma Substation, which is in the City of Ontario, with approximately 11 miles of 230 kV transmission lines. Then the Circle City Substation would connect to Riverside with a 66 kV transmission lines to serve the RPU's load. A3-1

ORA recommends that Modified Alternative 26 be evaluated in the Final Subsequent Environmental Impact Report (FSEIR) to consider the potential approval of Valley-Ivyglen Substation. Modified Alternative 26 meets the basic project objectives, meets the regulatory feasibility criteria, and reduces environmental impacts as discussed below. In addition, ORA recommends the Commission evaluate another bulk transmission alternative (Proposed Bulk Transmission Alternative, see Figure 3) in the FSEIR as discussed below.

The Modified Alternative 26 Meets the Basic Project Objectives

As defined in the DSEIR, the basic project objectives for the RTRP are to (i) increase capacity to meet existing and future load growth, and (ii) provide an additional point of delivery for bulk power into the RPU electrical system. If an alternative did not meet at least one of the basic project objectives, the DSEIR rejected it from further analysis.[9]

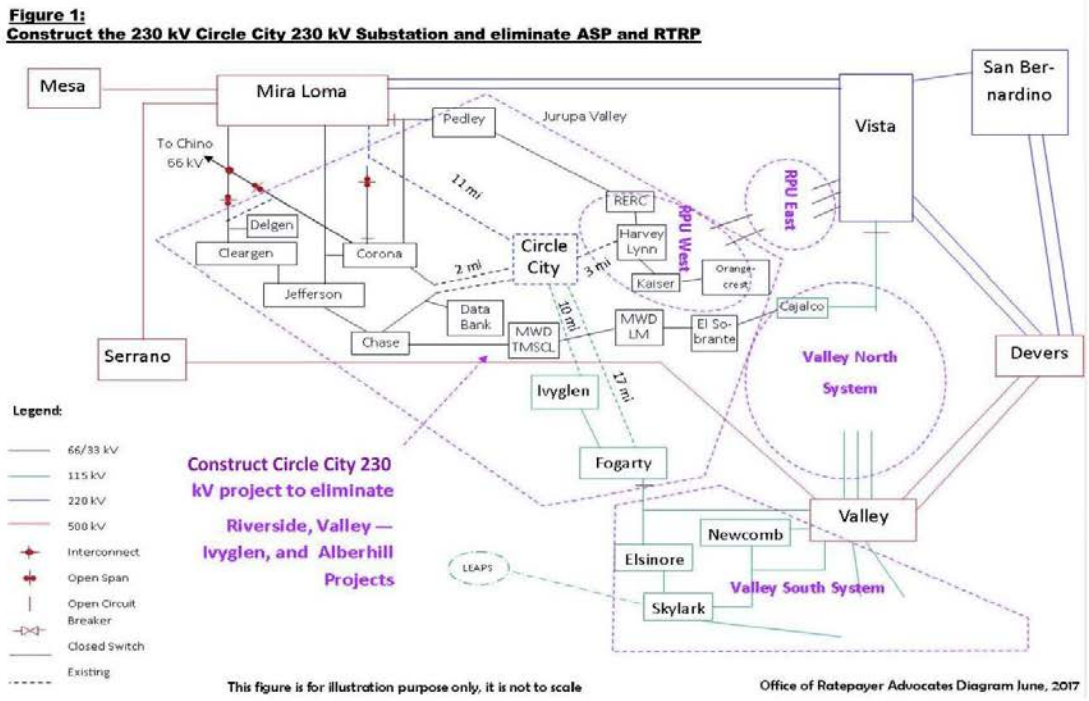
[6] DSEIR, p. 3-44.
[7] DSEIR, p. 3-44.
[8] Modified Alternative 26 should be evaluated in the FSEIR regardless of whether the PD is adopted by the Commission or not.
[9] DSEIR, p. 3-4.

The DSEIR eliminated twenty-six alternatives from formal review and provided brief explanations for their elimination.[10] The remaining four alternatives that proceeded to the California Environmental Quality Act (CEQA) formal ranking process are a variation of SCE's proposed project, which is a ten mile 230 kV line tapped from the Mira Loma – Valley line that routes overhead and underground for approxiamately eight miles to SCE's Wildlife Substation.[11]

ORA's proposed Modified Alternative 26 meets all of SCE's proposed project objectives, and also would result in less cost and less enviromental impact by eliminating the construction of two substations: SCE's Proposed 230 kV Wildlife Substation in the City of Riverside and the RPU's 66 kV Wilderness Substation in the RPU service area. Therfore, the Modified Alternative 26 should be compared to the DSEIR's Alternatives 1 – 4 in the FSEIR.

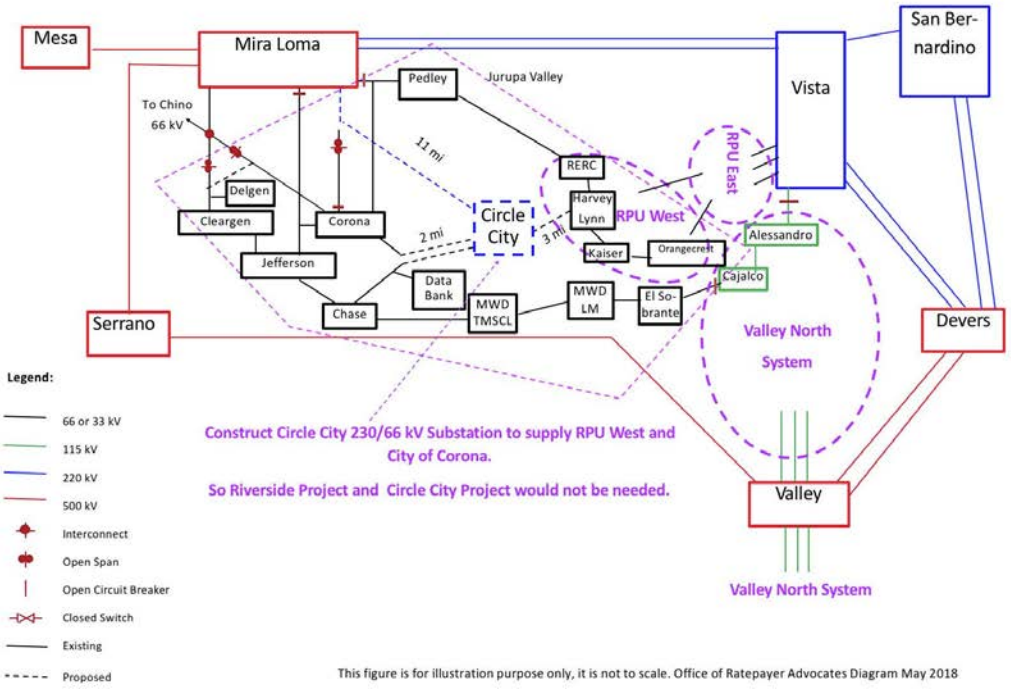
A3-1

Figure 1 – Alternative 26



[10] DSEIR, p. 3-3.
[11] DSEIR, p. 3-22.

Figure 2 – Modified Alternative 26



A3-1

The Modified Alternative 26 Meets Regulatory Feasibility Criteria

As defined in the DSEIR for the RTRP, regulatory feasibility criteria consider factors such as: limitations to permitting a high-voltage transmission line and other required electrical infrastructure, lands with legal protections, consistency with regulatory standards, whether the cost of the alternative would be prohibitive, and the consideration of current technology. Alternatives that were not potentially feasible were rejected from further analysis.[12]

The Modified Alternative 26's 230 kV high voltage line route should not have any permitting limitations. In fact, the line route may have fewer environmental impacts compared to the proposed project. For example, there is no need to build two substations (one for the SCE's 230 kV line and one for the RPU's 66 kV lines). Also, construction of the Modified Alternative 26, may not impact lands with legal protection along the transmission route. In addition, the Modified Alternative 26 is consistent with regulatory standards and uses the same technology as the DSEIR's Alternatives 1-4. In fact, a major part of the Modified Alternative 26's 230 kV lines follow SCE's proposed 230 kV Substation siting and routing,

[12] DSEIR, p. 3-4.

which is in SCE's existing ROW, thus eliminating the acquisition of a major additional ROW. Therefore, the Modified Alternative 26 will improve the feasibility and permitting of a high-voltage transmission line, and reduce the overall cost and environmental impact of the RTRP.

The Modified Alternative 26 Avoids or Reduces Significant Environmental Impacts

As defined in the DSEIR for the RTRP, potentially significant impacts of the Revised Project[13] include aesthetic impacts from the riser poles proposed at Limonite Avenue, overhead transmission poles along Wineville Avenue, and noise and traffic impacts from the construction of the underground transmission line. Alternatives that would not avoid or reduce any significant impacts of the Revised Project, or would create or substantially increase significant impacts compared to the Revised Project were rejected from further analysis.[14]

A3-1

The Modified Alternative 26 may reduce environmental impacts from noise, traffic, utilities, and other hazards identified in comparison to the four alternatives that received full analysis. The DSEIR's four alternatives would use Wineville Avenue and other routes before transitioning from overhead to underground.[15] In contrast, the Modified Alternative 26 will not use Wineville Avenue for the construction of special riser poles for the required transmission lines. Without the overhead line towers and underground transitions, which require special riser poles, the Modified Alternative 26's aesthetics at Key Observation Points (KOP) will lessen the environmental impact for the RTRP. Also, construction time for the Modified Alternative 26 will be less than the Revised Project's construction time, as there will be no trenching and installation of underground ducts. Traffic impacts along Wineville, Limonite, and Pats Ranch Road will not be affected. Given these attributes, ORA recommends that the Modified Alternative 26 be considered for a full environmental review and compared to the four screened alternatives in the FSEIR.

Proposed Bulk Transmission Alternative

ORA also recommends that the FSEIR evaluate the construction of a new 500 kV Substation to be located at the Metropolitan Water District Substation at Temescal Canyon (MWD-TMSCL). The new 500 kV Substation at MWD-TMSCL would connect to SCE's existing 500 kV Serrano to Valley transmission line and also would connect to RPU's Harvey Lynn 66kV Substation. (See Figure 3) This bulk transmission alternative would: 1) meet all of the project objectives of a bulk transmission resource for SCE and RPU; 2) eliminate the construction of SCE's proposed 230 kV Wildlife Substation and the RPU's 66 kV Wilderness Substation; 3) eliminate all 230 kV underground routings that are recommended in the DSEIR's Alternatives 1– 4; 4) cost significantly less than the Proposed Project and Alternatives 1-4; and 5) cause fewer environmental impacts than the Proposed Project. Additionally, this alternative would further reduce the bulk transmission route to about a mile

A3-2

[13] The Revised Project includes transmission line route changes and two miles of underground that were not included in RPU's 2013 certified EIR.
[14] DSEIR, p. 3-44.
[15] DSEIR, p. 3-8 – p. 3.9.

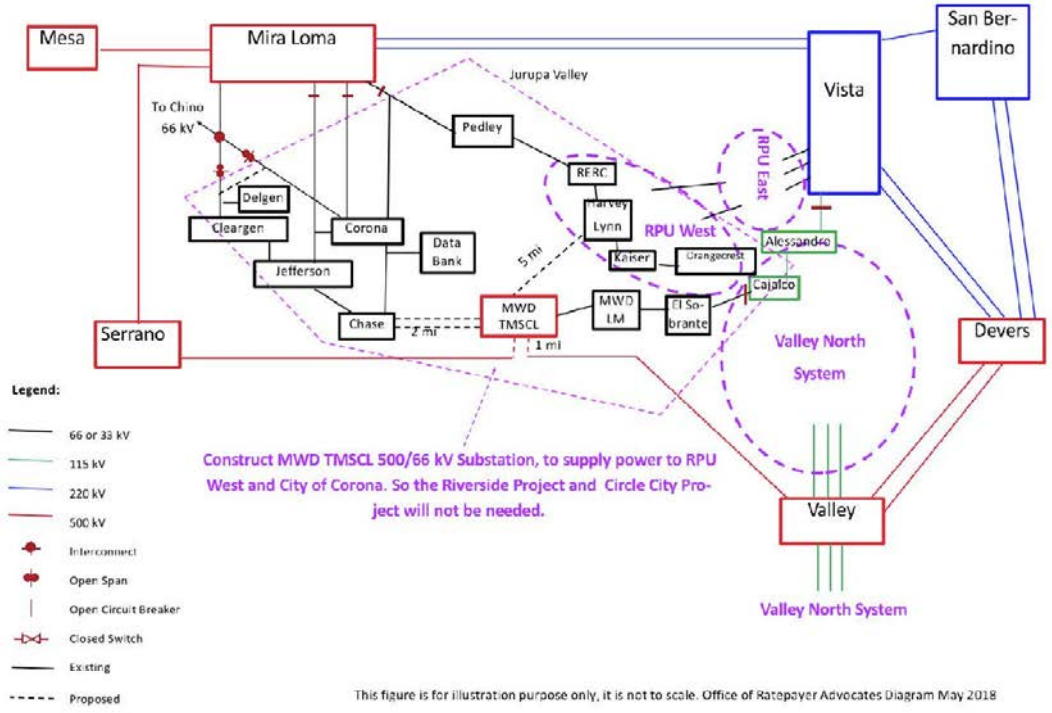
of 500 kV transmission line to connect with the Serrano/Valley 500 kV transmission line (See Figure 3), while the four alternatives analyzed in the DSEIR and Modified Alternative 26 require 10 – 11 miles of 230 kV transmission lines. In addition to meeting all of the RTRP bulk transmission system objectives, the bulk transmission alternative would cost significantly less and have fewer environmental impacts compared to SCE's Proposed Project and Alternatives 1-4. Therefore, the Commission should conduct a full environmental review on this alternative in the FSEIR and compare it to the four screened alternatives and Modified Alternative 26.

A3-2

Figure 3 – Proposed Bulk Transmission Alternative

Figure 3:

Construct MWD TMSCL 500 kV Substation to eliminate RTRP and Circle City Project



Conclusion

ORA recommends that the Commission conduct full environmental reviews of ORA's Proposed Modified Alternative 26 and Proposed Bulk Transmission Alternative.

A3-3

If you have questions, please contact either Ken Lewis (415-703-1977, Kenneth.Lewis@cpuc.ca.gov) or Joseph Abhulimen (415-703-1552, Joseph.Abhulimen@cpuc.ca.gov).

Respectfully submitted,
/s/ Chloe Lukins
CHLOE LUKINS

Program Manager for
The Office of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

cc: Jensen Uchida, Project Manager, California Public Utilities Commission

3.2.3 Response to Letter A3: Lukins, Chloe – California Public Utilities Commission, Office of Ratepayer Advocates

A3-1 The Office of Ratepayer Advocates (ORA) suggests that in the event that the CPUC adopts the April 4, 2018 Proposed Decision for Valley–Ivyglen and Alberhill, the 27 miles of 115-kV transmission line required by Alternative 26 to connect the Ivyglen and Fogarty substations would be unnecessary (as of the time of writing, the Commission has yet to adopt this proposed decision). ORA further contends that removal of the 115-kV transmission line from the alternative would substantially reduce environmental impacts. ORA, therefore, requests that a modified version of Alternative 26 be re-evaluated without the 115-kV transmission line, based on the proposed decision on the Valley–Ivyglen application.

The description of Alternative 26 is provided as follows, to provide a clear understanding of the alternative that was screened in the Subsequent EIR:

> This alternative would construct Circle City Substation as a 220/115/66-kV Substation and interconnect it to Mira Loma Substation with approximately 11 miles of 220-kV lines using existing and new ROW. Approximately 27 miles of 115-kV lines along I-15 freeway would be constructed to interconnect Ivyglen and Fogarty 115-kV Substations to the Circle City 220-kV Substation.

Subsequent to the ORA comment, the Draft EIR for Circle City Substation and Mira Loma-Jefferson 66-kV Subtransmission Line Project (Circle City Project) was published on June 4, 2018. The Circle City Draft EIR analyzes only the 66/12-kV alternative for the Circle City Substation. Further, the Environmentally Superior Alternative is identified as an underground 66-kV line following Hellman Avenue and 12-kV distribution-level battery storage.

The system alternative requested by ORA relies on the assumptions that:

- Circle City Substation would be built as a 230/66/12-kV configuration;
- 11 miles of 230-kV transmission line would be constructed between Mira Loma Substation and the new, theoretical, Circle City Substation; and
- An additional 3 miles of 230-kV transmission line would be constructed between the Circle City Substation and Harvey Allen Substation (an RPU substation).

The modified Alternative 26 should more appropriately be compared to the Environmentally Superior Alternative identified in the Circle City Project Draft EIR and the Revised Project.

Constructing the 220-kV transmission line required by the modified Alternative 26 would still cause more impact than constructing the approximately 2.5 miles of transmission line required by the Revised Project due to the construction of substantially longer transmission and power lines. Modified Alternative 26 would be eliminated from further analysis in the Subsequent EIR and a full environmental review of modified Alternative 26 and a comparison to alternatives screened in the Subsequent EIR, therefore, is not necessary.

A3-2 ORA recommends the analysis of a new alternative, referred to as the "Proposed Bulk Transmission Alternative," which involves construction of:

- A new 500-kV/66-kV substation at the Metropolitan Water District;
- A new 1-mile 500-kV double-circuit transmission line between the existing Serrano – Valley 500-kV Transmission Line; and
- A new 5-mile 66-kV interconnection to the existing RPU Harvey Lynn Substation.

Alternatives considered in the Subsequent EIR are screened in comparison to the Revised Project. Alternatives carried forward for full analysis in the Subsequent EIR not only meet project objectives and feasibility criteria, they also reduce significant impacts of the Revised Project and do not have greater overall environmental impacts compared to the Revised Project. The CPUC reviewed the new Proposed Bulk Transmission Alternative and determined it would have greater impact than the Revised Project. The Proposed Bulk Transmission Alternative would require a greater amount of ground disturbance than the Revised Project due to the construction of the 500-kV/66-kV substation, 500-kV transmission line, and 66-kV interconnection to Harvey Lynn Substation. The scope of the Draft Subsequent EIR is the Revised Project, as clearly defined in MR-3. Impacts resulting from the Proposed Bulk Transmission Alternative would be greater than the Revised Project and should not be considered in the Subsequent EIR. No modifications to the Subsequent EIR or the Alternatives Screening Report are necessary.

A3-3 Comment noted. Refer to responses A3-1 and A3-2 for an explanation as to why Modified Alternative 26 and Proposed Bulk Transmission Alternative are not analyzed in the Subsequent EIR.

Comment Letter A4

CPUC - CEQA dEIR for RTRP

Jessica Mauck <JMauck@sanmanuel-nsn.gov> Thu, Mar 29, 2018 at 4:31 PM
To: "riversidetrp@panoramaenv.com" <riversidetrp@panoramaenv.com>

Hello,

Thank you for contacting the San Manuel Band of Mission Indians (SMBMI) regarding the above referenced project. SMBMI appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on 29 March 2018. The proposed project area is located outside of Serrano ancestral territory and, as such, SMBMI will not be requesting consulting party status with the lead agency or requesting to participate in the scoping, development, and/or review of documents created pursuant to these legal and regulatory mandates. A4-1

Regards,

Jessica Mauck
CULTURAL RESOURCES ANALYST
O: (909) 864-8933 x3249
M: (909) 725-9054
26569 Community Center Drive, Highland California 92346
SAN MANUEL
BAND OF MISSION INDIANS

3.2.4 Response to Letter A4: Mauck, Jessica – San Manuel Band of Mission Indians

A4-1 Comment noted. The CPUC acknowledges that the Proposed Project is located outside the boundaries of the recognized Serrano ancestral territory and that the Tribe will not be requesting consulting party status.

Comment Letter A5

PECHANGA CULTURAL RESOURCES
Temecula Band of Luiseño Mission Indians

Post Office. Box 2183 • Temecula, CA 92593
Telephone (951) 770-6300 • Fax (951) 506-9491

May 17, 2018

VIA E-Mail and USPS

Jenson Uchida, Project Manager
State of California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: Pechanga Tribe Comments on the Draft Subsequent Environmental Impact Report for the Riverside Transmission Reliability Project

Dear Mr. Uchida,

This comment letter is submitted by the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government, in response to receipt of the April 2018 Draft Subsequent Environmental Impact Report (DSEIR) for the above named project.

The Tribe is in agreement with the proposed mitigation measures for cultural resources as presented in the drafted document for this Project and request that they be incorporated into the final DSEIR and added as conditions of approval for the Project. Riverside is a culturally significant area and the Tribe appreciates the opportunity to preserve and protect our sensitive cultural resources and to monitor earthmoving activities in the area. The Tribe thanks the Public Utilities Commission for the revision of the proposed mitigation measures which address the potential impacts to cultural resources, and for the inclusion of the Tribe in those measures. A5-1

The Pechanga Tribe looks forward to continuing to work together with the State of California Public Utilities Commission in protecting invaluable Pechanga cultural resources. Please contact me at 951-770-6313 if you have any questions or comments.

Sincerely,

Ebru Ozdil
Planning Specialist

cc: Pechanga Office of the General Counsel

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

3.2.5 Response to Letter A5: Ozdil, Ebru – Pechanga Cultural Resources

A5-1 The Tribe's agreement with the proposed mitigation measures identified to address impacts on cultural resources in the Draft Subsequent EIR is noted. Modifications to MM CUL-02B and MM CUL-02E have been incorporated at the request of SCE. The revisions do not alter the effectiveness of the measure or substantially alter the implementation. The cultural and tribal resources mitigation measures have been incorporated into the Final Subsequent EIR with the minor modifications mentioned above.

Comment Letter A6

Broken Link to Riverside Transmission Reliability Project Draft EIR

Ian Achimore <IAchimore@sawpa.org> Fri, Mar 30, 2018 at 4:49 PM
To: "riversidetrp@panoramaenv.com" <riversidetrp@panoramaenv.com>

Hello,

It looks like the link to the EIR for the Riverside Transmission Reliability Project is broken on this page:

http://www.cpuc.ca.gov/environment/info/panoramaenv/RTRP/#EnvReview

A6-1

My agency is trying to view the EIR. Just wondering how many truck trips you think you'll have in the fall of 2018 near and on the Van Buren Blvd bridge over the Santa Ana River. We have a project in the area so it would be good to coordinate if you are expecting a lot. I see there is a yard off of Clay Street in the area that may be used so figure there may be some truck trips in the area of the Van Buren Blvd.

A6-2

Thanks for your letter in the mail,

Ian

Ian Achimore

Senior Watershed Manager - **Santa Ana Watershed Project Authority**

11615 Sterling Avenue, Riverside, CA 92503-4979 | 951.354.4233 work | 951.202.5277 cell

www.sawpa.org

3.2.6 Response to Letter A6: Achimore, Ian – Santa Ana Watershed Project Authority

A6-1 The links to the Subsequent EIR and individual sections are currently functioning.

A6-2 SCE anticipates that construction of the Proposed Project would begin in 2021 and last approximately 26 months, ending in 2023. No truck trips associated with the Proposed Project would occur in 2018.

Comment Letter A7

DEIR RTRP notice

Rull, Paul <PRull@rivco.org> Mon, Apr 2, 2018 at 8:02 AM
To: "riversidetrp@panoramaenv.com" <riversidetrp@panoramaenv.com>

Good Morning,

Thank you for transmitting the project to ALUC for review and has no comments at this time. Please note that the Airport Land Use Commission found the original project consistent (ZAP1052R11). A7-1

If you have any questions, please feel free to contact me.

Paul Rull

ALUC Urban Regional Planner IV

Riverside County Airport Land Use Commission
4080 Lemon Street, 14th Floor
Riverside, Ca 92501
(951) 955-6893
(951) 955-5177 (fax)
PRULL@RIVCO.ORG

www.rcaluc.org

3.2.7 Response to Letter A7: Rull, Paul – Riverside County Airport Land Use Commission

A7-1 The CPUC acknowledges that the Riverside County Airport Land Use Commission determined the Proposed Project is consistent with the Riverside County Airport Land Use Compatibility Plan. The commenter does not raise specific issues related to the adequacy of the environmental analysis in the Draft Subsequent EIR, therefore, no additional response is provided or required.

Comment Letter A8

JASON E. UHLEY
General Manager-Chief Engineer

1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
FAX 951.788.9965
www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

May 3, 2018

Riverside Transmission Reliability Project
717 Market Street, Suite 650
San Francisco, CA 94103

To Whom It May Concern:

Re: Comments on the Subsequent Draft Environmental Impact Report for the Riverside Transmission Reliability Project

This letter is written in response to the Subsequent Draft Environmental Impact Report (SDEIR) for the Riverside Transmission Reliability Project. The proposed project involves the construction of transmission line structures, electrical substations, and upgrades to existing substations and telecommunication facilities. The proposed project is located in Riverside County within the cities of Jurupa Valley, Norco, and Riverside.

The District has the following comment/concern that should be considered in the Subsequent EIR:

> The proposed project appears to be located within the District's Day Creek Master Drainage Plan (MDP) boundaries. When fully implemented, these MDP facilities will provide flood protection to relieve those areas within the MDP boundary. The SDEIR should consider any potential impacts to proposed and existing facilities in the Day Creek MDP. To obtain more information on the MDP, please see the District's website at http://rcflood.org/PlanningDivision.aspx and/or contact Mike Wong of the District's Project Planning Section at 951.955.1345. A8-1

Thank you for the opportunity to review the SDEIR. Please forward any environmental documents regarding the project to my attention at this office and/or via email to jvalle@rivco.org. Any further questions concerning this letter may be referred to Drew Marshall at 951.955.4643 or me at 951.955.8856. A8-2

Very truly yours,

JOAN VALLE
Senior Flood Control Planner

ARM:mcv
P8\220726

3.2.8 Response to Letter A8: Valle, Joan – Riverside County Flood Control and Water Conservation District

A8-1 On May 22, 2018, CPUC conducted a phone call with the Riverside County Flood Control District in response to this comment, which requests that the Subsequent EIR identify potential impacts from implementation of the Revised Project on the Day Creek Master Drainage Plan. As-built drawings of existing facilities and plans for future segments of the Master Drainage Plan were reviewed to determine whether any conflict would occur. The CPUC confirmed that the Revised Project would not conflict with the existing Day Creek Master Drainage Plan infrastructure and would not preclude future construction of planned flood protection facilities identified by the Day Creek Master Drainage Plan (Williams, 2018).

A8-2 The request that future environmental documents be sent to the commenter is noted.

Comment Letter A9

GREATER RIVERSIDE CHAMBERS OF COMMERCE

The Chamber...building a stronger local economy

May 4, 2018

Jensen Uchida
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Riverside Transmission Reliability Project (RTRP) Hybrid Proposal - Support

Dear Mr. Uchida,

On behalf of the Greater Riverside Chambers of Commerce, representing over 1,300 members and 107,000 jobs in the Inland Southern California region, I am writing to express our support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. **Based upon the findings in the Draft Subsequent Environmental Impact Report, it is clear that this proposal represents the most cost-effective and least-intrusive option that serves the needs of a growing population.** A9-1

The RTRP Hybrid Proposal would serve as an important tool in attracting and retaining businesses in the area. With recent business expansion in Riverside, including the $414 million California Air Resources Board emissions testing facility, providing long-term transmission capacity via this proposal will play a pivotal role in further encouraging businesses to grow and thrive in Riverside.

Currently, Riverside is the most populous city in California that lacks a second connection to the statewide grid. The lack of a secondary connection places hundreds of thousands of residents and businesses at risk of being without power in the event of a natural disaster. Unfortunately, any blackout would have adverse effects on Riverside's businesses, schools, hospitals, fire and police stations, shelters, jails, and infrastructure. A9-2

In 2006, the California Independent System Operator ordered Southern California Edison to establish a secondary connection to match the reliability neighboring cities currently enjoy. If approvals are received, the new connection would be built and energized in 2023. Bringing the second connection on-line by this date is a critical step in ensuring public safety and continuing Riverside's economic growth.

For these reasons, we respectfully request your full support and approval of the RTRP Hybrid Proposal. Thank you for your consideration.

Respectfully,

Cindy Roth
President/CEO

CR/as

3985 University Avenue, Riverside, CA 92501 • Phone: (951) 683-7100 • Fax: (951) 683-2670
www.riverside-chamber.com

3.2.9 Response to Letter A9: Roth, Cindy – Greater Riverside Chambers of Commerce

A9-1 Comment and general support for the project are noted. The Alternative Screening Report screened a total of 31 Alternatives, including the No Project Alternative. Four alternatives were retained for further analysis in the Subsequent EIR due to their feasibility and amelioration of Revised Project environmental impacts. The financial aspect or "cost-effectiveness" of the Revised Project is not considered as an environmental issue in the context of CEQA and is not analyzed in the Subsequent EIR.

The commenter's general comment of "the least-intrusive options" is not defined in the comment letter, and it is unclear what "options" the commenter is referring to. Overhead transmission lines as proposed in the RTRP Hybrid Proposal would be the least-intrusive for residents during the construction phase of the project when compared to the alternatives. However, in terms of long-term impacts Alternatives 1 and 2 would be the least-intrusive options. Alternatives 1 and 2 are underground alternatives that would include the installation of the 230-kV transmission line components of the Revised Project underground. This would substantially reduce the Revised Project's long-term aesthetic impact of the riser poles and overhead transmission lines. Further, Alternative 1 also reduces the agricultural impact from the loss of Prime Farmland. The undergrounding of these alternatives would increase temporary impacts on noise and traffic; however, these impacts would be limited to the construction period and would not be in a single location for more than a few months, at most. Refer to Appendix D: Alternatives Screening Report and Chapter 3: Alternatives of the Subsequent EIR for further details on the alternatives screening process and analysis for retained alternatives, respectively.

A9-2 The commenter's support of the Revised Project is noted. The comment will be included in the administrative record and considered by the CPUC during project deliberation.

Comment Letter A10

CITY OF NORCO

CITY HALL • 2870 CLARK AVENUE • NORCO CA 92860 • (951) 735-3900 • www.norco.ca.us •

May 15, 2018

Jensen Uchida, Environmental Project Manager
California Public Utilities Commission
c/o Panorama Environmental, Inc.
717 Market Street, Suite 650
San Francisco, CA 94103

Subject: Opposition to the Riverside Transmission Reliability Project (A-15-04-013)

Dear Mr. Uchida:

On May 2, 2018, the City Council of the City of Norco unanimously voted to reaffirm its opposition to the Riverside Transmission Reliability Project. The City Council's continued opposition to this project is based on the negative impacts the project will have on the City of Norco and its residents and visitors as currently proposed. A10-1

Based on the City Council's review of the project, the Council has strong concerns. Construction of overhead transmission lines across the Santa Ana River and its natural landscape is aesthetically unacceptable because of negative impact on property values and recreation resources for residents and visitors as the lines are disruptive to scenic views and the visual character of the Santa Ana River corridor. Additionally, the City Council has concerns about the significant loss of agricultural land in this area resulting from this project, as well as the potential threat to fire safety. A10-2 A10-3 A10-4 A10-5

The City Council hopes that you will consider these concerns in your final project proposals and decisions.

Sincerely,

Ted Hoffman, Mayor
City of Norco

cc: Norco City Council Members
Andy Okoro, City Manager

CITY COUNCIL

TED HOFFMAN	ROBIN GRUNDMEYER	KEVIN BASH	BERWIN HANNA	GREG NEWTON
Mayor	Mayor Pro Tem	Council Member	Council Member	Council Member

3.2.10 Response to Letter A10: Hoffman, Ted – City of Norco

A10-1 The opposition to the RTRP is noted.

A10-2 This comment refers to aesthetics and property values. The commenter's opinion regarding the aesthetic impacts associated with the Santa Ana River Crossing element of the Proposed Project is noted. The effects of the transmission line crossing the Santa Ana River were analyzed in the certified 2013 RTRP EIR. The river crossing is not within the scope of review for the Subsequent EIR, which analyzes changes to the Proposed Project, changes in circumstances, and aspects that could have new significant effects that were not previously analyzed. The Revised Project riser poles within the Goose Creek Golf Club would be visible from residences and recreational trails in Norco. The Subsequent EIR addressed environmental impacts resulting from the proposed riser poles and determined the aesthetic impact to be significant and unavoidable. The CPUC considered alternatives that would cross the river in other locations; however, the alternatives were found to have greater impacts than the Revised Project. The scope of the Subsequent EIR is addressed in MR-3.

The comment regarding Proposed Project effects on property values is noted. Impacts on property values are not considered an environmental issue in the context of CEQA, thus neither the certified 2013 RTRP EIR nor the Subsequent EIR analyzed the effects of the overhead transmission line on property values. Refer to MR-10 for further information regarding transmission line effects associated with property values.

A10-3 Environmental impacts resulting from (1) the Proposed Project changes and (2) changes in circumstances not analyzed in the certified 2013 RTRP EIR, as noted further in MR-3, were addressed in the Subsequent EIR. The overhead 230-kV transmission line effects south of the Santa Ana River is an unchanged portion of the Proposed Project, therefore, was not addressed in the Subsequent EIR. The overhead 230-kV transmission line would affect views across the Santa Ana River. As stated in response A10-2, aesthetic impacts associated with the transmission line crossing the Santa Ana River were analyzed in the certified 2013 RTRP EIR. Recreation impacts, including impacts on the recreational value of existing recreational facilities, from construction and operation of the Proposed Project, were also adequately analyzed in the certified 2013 RTRP EIR. Operation of the riser poles in the Goose Creek Golf Course would not cause greater impact than the 230-kV transmission line, which was analyzed adequately in the certified 2013 RTRP EIR. Refer to MR-3 regarding the scope of the Subsequent EIR.

A10-4 The comment regarding agricultural impacts of the Proposed Project is noted. Impacts on agriculture from the Revised Project would be limited to the City of Jurupa Valley and would result in the permanent loss of 0.4 acre of Important

Farmland. Impacts associated with the transmission line that would be constructed south of the Santa Ana River were analyzed in the certified 2013 RTRP EIR. Refer to Section 3.2.2: Agricultural and Forestry Resources of the certified 2013 RTRP EIR for further information regarding the agricultural impacts of the Proposed Project on the City of Norco.

A10-5 The comment regarding fire safety of the Proposed Project is noted. Refer to Section 3.2.7: Hazards and Hazardous Materials of the certified 2013 RTRP EIR for further details regarding fire hazard and fire hazard mitigation measures associated with the Proposed Project.

Comment Letter A11

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:
riversidetrp@panoramaenv.com
Jensen Uchida
Riverside Transmission Reliability Project
717 Market Street, Suite 650
San Francisco, CA 94103

May 15, 2018

Draft Subsequent Environmental Impact Report (Draft SEIR) for the Proposed West Basin Ocean Water Desalination Project Building (SCH No.: 2007011113)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final SEIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct (1) approximately 0.4 miles of new overhead 230-kV double-circuit transmission line, (2) approximately two miles of new underground 230-kV double-circuit transmission line, (3) relocation of existing overhead distribution lines or a different overhead location to accommodate the new 230-kV transmission line, and (4) temporary uses of two marshalling yards to store construction materials (Proposed Project). Construction of the Proposed Project is expected to take approximately 26 months[1]. Based on a review of aerial photographs of Project location, SCAQMD staff found that construction of portions of the Proposed Project would be in proximity to existing residential uses.

SCAQMD Staff's Summary of Air Quality Analysis

The Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD air quality CEQA regional significance thresholds and found that the Proposed Project would be less than significant after incorporating Mitigation Measure (MM) AQ-01 through AQ-03[2]. MM AQ-01 requires the preparation and implementation of a Fugitive Dust Control Plan. MM AQ-02 specifies exhaust emissions controls for worker vehicles and construction equipment. For example, construction equipment greater than 50 horsepower must meet Tier 4 emission standards, where available[3]. MM AQ-03 restricts overlapping construction to further reduce emissions from NOx, PM10, and PM2.5.

A11-1

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)[4], which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

1 Draft SEIR. Page 2-23.
2 Draft SEIR. Page ES-24.
3 Draft SEIR. Page 4.3-46.
4 South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan.* Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

Jensen Uchida May 15, 2018

General Comments

SCAQMD staff reviewed and has comments on the Air Quality Analysis in the Draft SEIR. Please see the attachment for more information. Additionally, as described in the 2016 AQMP, to achieve NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. The mitigation measures for the Proposed Project play an important role in contributing to NOx emissions reductions, as well as in reducing PM10 and PM2.5 emissions. Therefore, SCAQMD staff recommends changes to existing MM AQ-2 and additional mitigation measures to further reduce NOx, PM10, and PM2.5 emissions. A11-1

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final SEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project. A11-2

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS
RVC180330-04
Control Number

2

Jensen Uchida May 15, 2018

ATTACHMENT

Localized Air Quality Impact Analysis during Construction

1. Air quality impacts from both construction (including demolition, if any) and operation activities should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips).

   Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. They include schools, parks and playgrounds, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. Based a review of aerial photographs, SCAQMD staff found that existing residential uses are located in proximity to the Proposed Project (e.g., west of the underground 230-kV double-circuit transmission line). However, the Lead Agency did not quantify the Proposed Project's localized construction emissions in the Draft SEIR. Therefore, SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's localized construction emissions and disclose the localized air quality impacts in the Final SEIR to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis is available on SCAQMD website[5]. A11-3

Recommended Changes to Existing Mitigation Measure (MM) AQ-02

2. As stated above, MM AQ-2 requires, among others, that "all off-road diesel-powered construction equipment greater than 50 horsepower (hp) meet the Tier 4 emission standards, where available […][6]." This means that only Tier 4 engines can be used during construction. However, the Lead Agency's specified performance standards and timing for this requirement of MM AQ-02 is not consistent since it says that "construction equipment and vehicles are required to meet USEPA-certified Tier 3 emissions standards or higher"[7]. Based on this performance standard, Tier 3 engines may be used during construction. Additionally, according to Appendix G, *Air Quality and Greenhouse Gas Supporting Information*, Tier 4 emission standards were used to calculate mitigated construction emissions. Therefore, to be consistent with the modeling assumption and the Lead Agency's commitment to using Tier 4 engines, and to further reduce NOx emissions during construction, SCAQMD staff recommends that the Lead Agency incorporate the following changes to MM AQ-02 in the Final SEIR.

   MM AQ-02: Exhaust Emissions Control

   […]

   - During Project construction, all off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet the Tier 4 emission standards~~, where available~~. […]

   […]

   Performance Standards and Timing: A11-4

[5] South Coast Air Quality Management District. *Localized Significance Thresholds*. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.
[6] Draft SEIR. Page 4.3-46.
[7] *Ibid.*

Jensen Uchida May 15, 2018

[…]

- **During Construction**: (1) […], (2) Provide copies of document that construction equipment and vehicles meet USEPA-Certified Tier ~~3~~ 4 emissions standards ~~or higher~~ to the CPUC as equipment is mobilized. A11-4

Additional Recommended Mitigation Measure

3. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce the impacts of NOx emissions during construction, the Lead Agency should require the use of diesel haul trucks that conform to 2010 USEPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction. If the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible supported by substantial evidence in the record, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance A11-5

Permits

4. In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final SEIR. For more information on permits, please visit the SCAQMD webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to the SCAQMD's Engineering and Permitting staff at (909) 396-3385. A11-6

3.2.11 Response to Letter A11: Sun, Lijin – South Coast Air Quality Management District

A11-1 The South Coast Air Quality Management District (SCAQMD) comment refers to the 2016 Air Quality Management Plan (2016 AQMP) and recommends changes to the Subsequent EIR air quality mitigation measures. The CPUC is familiar with the 2016 AQMP and the Proposed Project's consistency with this plan is analyzed in the Subsequent EIR. Response A11-4 and response A11-5 address the recommended changes to the mitigation measures.

A11-2 Responses to the recommended changes to the analysis and mitigation measures are provided in accordance with California Public Resources Code and CEQA Guidelines. The response was prepared in good faith, and the conclusions are supported by reasoned analysis and facts.

A11-3 The effects on local ambient air quality from construction and operation of the Proposed Project are analyzed in Section 4.3: Air Quality and Greenhouse Gas Emissions. Operation and maintenance of the Proposed Project would involve inspection and maintenance of the facilities. The number of vehicles (not more than two per day) required for facility inspection and maintenance are not anticipated to result in a substantial increase in pollutant concentrations, TAC emissions, or CO emissions. Table 4.3-15 includes the maximum estimated daily emissions anticipated during project operation. Appendix G includes information supporting the emissions values provided in Table 4.3-15.

Due to the proximity between construction work areas and sensitive receptors, a more robust analysis was conducted than specified in the Final Localized Significance Threshold Methodology. The methodology used to conduct the ambient air quality analysis is described in Section 4.3.7: Project Impact Analysis of the Subsequent EIR.

Underground vault installation was determined to result in the highest ambient air pollutant concentrations of all the construction activities. Ambient pollutant concentrations were modeled for two construction scenarios:

1. Underground vault installation at three of the closest sensitive receptors
2. Overhead conductor installation at the closest sensitive receptor

The American Meteorological Society/U.S. EPA Regulatory Model Improvement Committee Model (AERMOD) Version 16216 was used to model the air dispersion of pollutants from ~~the underground~~ construction of the Proposed Project and from off-site ambient (background) concentrations.

Impact Air-d presents the quantification of ambient air pollutant concentrations as well as the analysis of the impact from ambient pollutant concentrations on

the nearby sensitive receptors. The detailed calculations and modeling assumptions are presented in Appendix G. As analyzed, ambient concentrations of nitrogen dioxide (NO_2), respirable particulate matter under ten micrometers (PM_{10}), and fire particulate matter less than 2.5 micrometers ($PM_{2.5}$) caused by underground construction activities would exceed SCAQMD significance thresholds. Ambient concentrations of PM_{10} caused by overhead construction activities would exceed the SCAQMD significance threshold.

MM AQ-01 and MM AQ-02 would be implemented to reduce the ambient air concentrations caused by underground and overhead construction activities. These mitigation measures require SCE to prepare and implement a Fugitive Dust Control Plan and specify exhaust emissions control requirements for worker vehicles and construction equipment. Mitigated ambient concentrations of NO_2, PM_{10} and $PM_{2.5}$ would be below the SCAQMD significance thresholds near all sensitive receptors adjacent to construction activities, regardless of distance. Refer to Section 4.3: Air Quality and Greenhouse Gas Emissions, Impact Air-d for the full analysis of impacts on sensitive receptors, summarized above, and calculations provided in Appendix G to support the analysis.

A11-4 The performance standard for MM AQ-02 was erroneously identified for Tier 3 emissions standards and has been revised as requested to specify Tier 4 and delete "where available." SCE requested revisions to MM AQ-02 to allow use of off-road equipment that does not meet Tier 4 standards, under specific circumstances. Changes were made to MM AQ-02 permitting SCE to do so after a due diligence search is conducted and only if calculation evidence proves that emissions remain below the SCAQMD significance thresholds. Refer to response D2-39 for details regarding changes added per SCE request.

MM AQ-02: Exhaust Emissions Control (Incorporates 2013 RTRP EIR MMs AQ-01 through AQ-06, AQ-15 through AQ-17, and AQ-19)

Exhaust emissions from worker vehicles, construction equipment, and vehicles shall be minimized by implementing the following control measures:

- Use ultra-low sulfur diesel fuel (e.g., <15 ppm).
- Use clean-burning on- and off-road diesel engines. Heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines) shall be utilized.
- SCE or its contractor shall develop a program and require construction workers to carpool to construction sites.
- Restrict construction vehicle idling time to less than 5 minutes.
- Properly maintain mechanical equipment.
- Use particle traps and other appropriate controls to reduce diesel particulate matter. Other control equipment includes devices such as specialized catalytic converters (oxidation catalysts) control approximately 20 percent of diesel particulate matter, 40 percent of carbon monoxide, and 50 percent of hydrocarbon emissions.
- ~~Provide temporary traffic controls, such as a flag person, during all phases of construction to maintain smooth traffic flow.~~

- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Define construction traffic routes to direct construction trucks away from congested streets or sensitive receptor areas.
- During Project construction, all off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet the Tier 4 emission standards~~, where available~~. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations (i.e., if Project construction goes beyond the anticipated schedule).
  - Alternatively, SCE or the contractor may be allowed to operate off-road equipment that does not meet Tier 4 emissions standards if SCE provides calculation evidence that use of the equipment will not cause an exceedance of SCAQMD significance thresholds. SCE must make a due diligence search to find and use equipment with the Tier 4 emissions standards or the highest emissions standards available. Circumstances where this may be applicable are limited to the following situations: (1) the equipment is specialty or unique and cannot be found with a Tier 4 engine (e.g., sag cat with three winches, PM_{10} street sweepers); (2) the equipment is not in use for more than 5 days total; and/or (3) the equipment is registered under CARB's Statewide Portable Equipment Registration Program.
- A copy of each unit's certified tier specification, BACT documentation, ~~and~~ CARB or SCAQMD operating permit, and Truck Regulation Upload, Compliance and Reporting System receipt shall be provided to the CPUC at the time of mobilization for each applicable unit of equipment.

Applicable Locations: All Proposed Project locations

Performance Standards and Timing:

- **Prior to Construction:** ~~N/A~~ SCE shall submit calculation evidence to the CPUC for review at least 2 weeks prior to use of off-road equipment that does not meet Tier 4 emissions standards, as needed
- **During Construction:** (1) SCE implements all exhaust emission control measures, (2) Provide copies of documentation proving that construction equipment and vehicles meet USEPA-Certified ~~Tier 3~~ Tier 4 emissions standards ~~or higher~~, are outfitted with BACT devices, and comply with the Truck and Bus Regulation to the CPUC as equipment is mobilized
- **Following Construction:** N/A

A11-5 Construction is scheduled to begin in 2021 and end in 2023 after 26 months. The fleet owner, contractor or SCE, would comply with CARB's Truck and Bus Regulation rollout schedule for transitioning diesel trucks (in excess of 14,001 pounds) with older engines to Model Year 2010 or newer engines. All trucks with Model Year 2004 or older engines would no longer be in use by the time construction begins. By 2023, all trucks would be Model Year 2010 or newer engines. The fleet owner would report to CARB using the Truck Regulation Upload, Compliance and Reporting System, as required by the regulation (CARB, 2017). It is not CPUC standard practice to include mitigation measures requiring applicants or their contractors to follow federal or state regulations, since they are required to adhere to the law. No additional mitigation measures are required. Minor modifications to MM AQ-02 were made to require SCE to submit proof of compliance with the Truck and Bus Regulation.

A11-6 If required, SCE would submit a permit application for the proposed Wildlife Substation and would comply with pertinent SCAQMD requirements. CPUC

acknowledges that SCAQMD would be a Responsible Agency if a permit is required. SCAQMD has been identified as a Responsible Agency in Chapter 1: Introduction.

> Wildlife Substation would not likely include a new combustion emission source (i.e., generator); a permit application to the South Coast Air Quality Management District (SCAQMD) is therefore unlikely to be required. The SCAQMD would be a Responsible Agency and have permitting authority over the proposed project, if a combustion emission source is proposed.

jurupa
COMMUNITY SERVICES DISTRICT

Comment Letter A12

May 15, 2018

Riverside Transmission Reliability Project
717 Market Street
Suite 650
San Francisco, CA 94103

Re: Review and Comment – Draft Subsequent EIR Riverside Transmission Reliability Project

Jurupa Community Services District (JCSD) would like to state its opposition to the route segments of the Riverside Transmission Reliability Project (RTRP) currently in the Draft Subsequent Environmental Impact Report (SEIR) phase which conflict with existing or planned critical water and sewer infrastructure.

The proposed RTRP alignment, which encompasses the Hidden Valley Wildlife Area Boundary Change, crosses several existing, current or proposed projects where the proposed RTRP 100-foot overhead right-of-way or underground alignment may encroach upon, or interfere with senior rights and/or incompatible usage; please see attachments provided.

Based on the published information, a more detailed analysis than was provided in the SEIR is necessary to identify all potential project conflicts. JCSD requested, but was not provided with enough specific information to determine with certainty all conflicts which may exists.

A12-1

Please contact me with any questions or concerns you may have. I may be reached at (951) 685-7434, extension 520, or by email at bkthomas@jcsd.us.

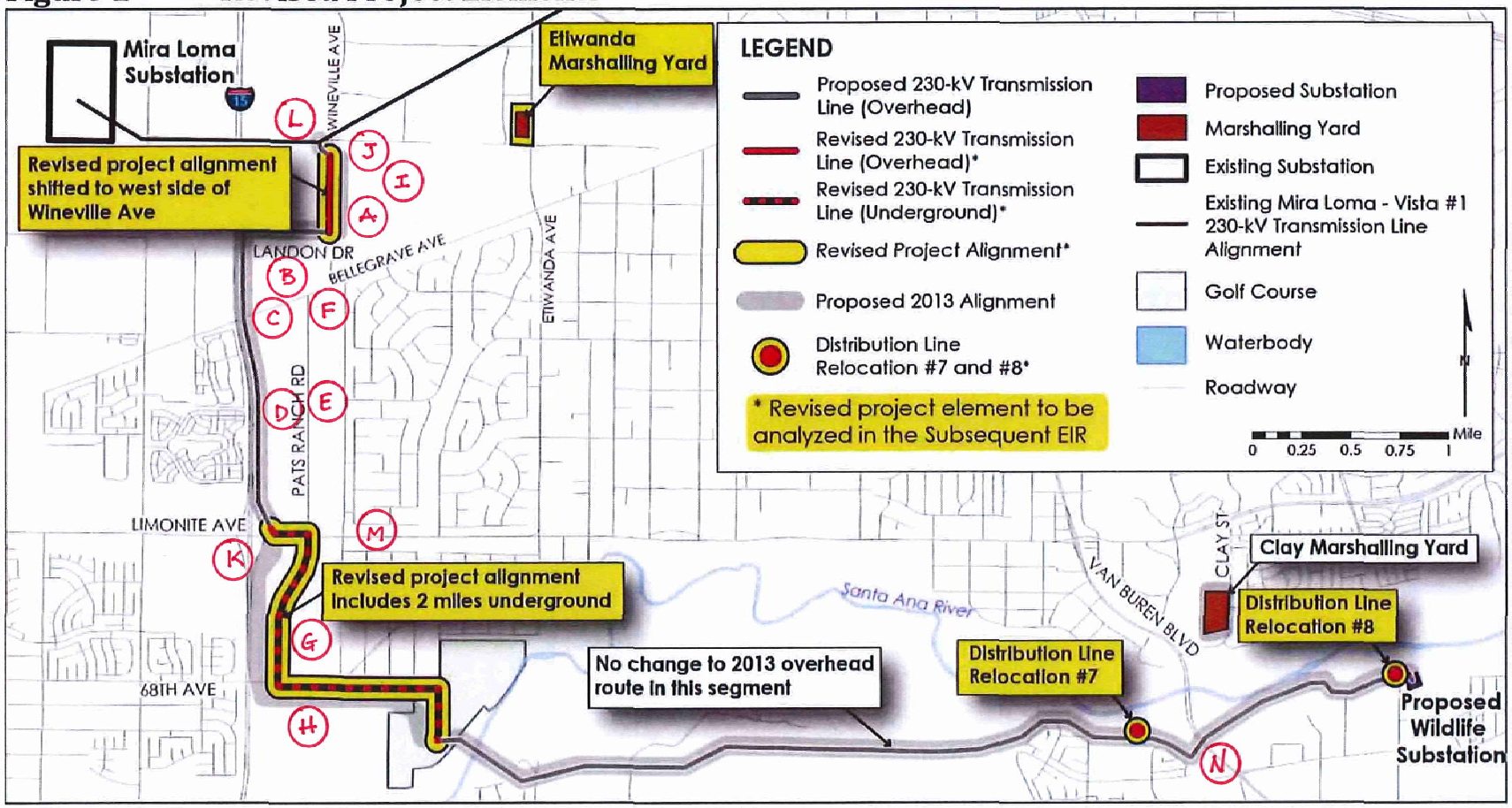
Sincerely,

Brian Thomas
Managing Engineer

attachments

11201 Harrel Street, Jurupa Valley, CA 91752 * Phone (951) 685-7434 * Fax (951) 727-3501

Figure 1 Revised Project Elements



Map No.	Size	Type	As-builts	Location
A	18" VCP	Sewer	Constructed	Wineville from Landon Drive to Cantu Galleano Ranch Road
	30" CML/CMC	Water	Constructed	Wineville from Landon Drive to Cantu Galleano Ranch Road
	18" CML/CMC	Water	Constructed	Wineville from Landon Drive to Cantu Galleano Ranch Road
B	8" VCP	Sewer	Constructed	Landon Drive
	16" CML/CMC	Water	Constructed	Landon Drive
C	Lessor Mall Development	Lessor	Pre-planning	East of I-15 between Bellegrave Avenue and Landon Drive
D	Future Commercial and High Density Residential	-	Undeveloped	East of I-15 between Limonite Avenue and Bellegrave Avenue
E	Harvest I & II	Lennar	Constructed	Pat Ranch Road between Limonite Avenue and Bellegrave Avenue
	Harvest III	Lennar	90% construction completed	Pat Ranch Road between Limonite Avenue and Bellegrave Avenue
F	Vernola Park	JARPD	Constructed	Pat Ranch Road south of Bellegrave Avenue
	Vernola Park Phase 2	JARPD	Planning	Pat Ranch Road south of Bellegrave Avenue
G	18" VCP	Sewer	Constructed	Pats Ranch Road from 68th Street to 64th Street
	10" VCP	Sewer	Constructed	Pats Ranch Road from 64th Street to Limonite Avenue
	18" CML/CMC	Water	Constructed	Pats Ranch Road from 68th Street to Limonite Avenue
H	18" VCP	Sewer	Constructed	68th Street from Pats Ranch Road to Wineville
	18" VCP	Sewer	Constructed	68th Street and Wineville
	8" CML/CMC	Water	Constructed	68th Street from Wineville to Carnelian Street
	12" CML/CMC	Water	Constructed	68th Street from Carnelian Street to Pats Ranch Road
	8" CML/CMC	Water	Constructed	Pats Ranch Road and 68th Street / 68th Street (east of Carnelian St.) / 68th Street from Wineville Ave to Smith Ave
I	Tr 31778	William Lyon	Constructed	Wineville Avenue between Bellegrave Avenue and Landon Drive
J	Tr 36692-1	Frontier	Under construction	Wineville Avenue between Landon Drive and Cantu-Galleano Ranch Road
K	Limonite Avenue / Interstate 15 Interchange Project	County of Riverside / Caltrans	Bid Complete - Contract to be awarded June 2018 with construction to start Sept. 2018	Interstate Bridge Modification - Limonite Avenue From Pats Ranch Road to Eastvale Gateway
L	CDA Plume Pipeline Project	Chino Desalter Authority Water Pipeline	Design	Wineville Avenue from Bellegrave to Harrel Street
M	30" CML/CMC (CDA)	Water	Constructed	Limonite Avenue from Interstate 15 to Etiwanda Avenue
N	Dual 24" HDPE	Sewer	Constructed	Van Buren Bridge
	24" PVC SDR 26	Sewer	Constructed	From south side of Van Buren Bridge to Jurupa Road
	18" CML/CMC	Water	Constructed	In Van Buren - RPU Interconnect Project

A12-2

3.2.12 Response to Letter A12: Thomas, Brian – Jurupa Community Services District

A12-1 The commenter's opposition to the Revised Project due to potential conflict with existing or planned critical water and sewer infrastructure is noted. The potential direct and indirect effects of the Revised Project and the alternatives on utility facilities are addressed in Section 4.11: Public Services and Utilities of the Subsequent EIR. Construction of the overhead 230-kV transmission line would involve auguring holes for TSP and LST foundations. Construction of the underground 230-kV transmission line would involve riser pole foundation borings, duct bank trenching, and vault excavations that would be located close to underground utilities. Construction of the Revised Project would have the potential to damage or rupture water, gas, sewer or stormwater pipelines or communications lines. Compliance with regulations requiring notification of local utilities 2 days prior to construction to identify general locations of underground facilities would minimize the impact, but not to a less-than-significant level. MM UTIL-01, MM UTIL-02, and MM HAZ-04, which require more extensive notification of utilities and the public, as well as potholing, would reduce the potentially significant impact on exiting utilities from construction activities to a less-than-significant level. Refer to Section 4.11: Public Services and Utilities for further information regarding the Revised Project impacts on existing utilities infrastructure and mitigation measures.

A12-2 Water and sewer infrastructure identified in the comment attachments (Figure 1 and in the table included in Comment A12) are included in Table 4.11-2: Known Utilities in the Revised Project Area (Overhead 230-kV Transmission Line) and Table 4.7-4: Known Utilities Near Alternatives 1 through 4. Information obtained from follow-up consultation with Jurupa Community Services District in response to the comment letter was also incorporated into Tables 4.11-2 and 4.7-4, as pertinent. Table 4.11-2 and Table 4.7-4 are revised as follows:

Table 4.11-2 Known ~~Underground~~ Utilities in the Revised Project Area

Utility Type	Location	Approximate Number of Lines ~~Along Road [a] and Relation to Revised Project~~	Diameter (inches)	Pipeline Material(s)
Overhead 230-kV Transmission Line				
Potable water main	Wineville Avenue (north of Landon Drive)	1 ~~parallel~~ 2 ~~crossing~~	18 ~~16 and 18~~	Cement mortar lined/cement mortar coated (CML/CMC) and welded steel
	Wineville Avenue (Cantu-Galleano Ranch Road to Bellegrave Avenue)	1	30	CML/CMC and welded steel
	Cantu-Galleano Ranch Road (west of Wineville Avenue)	1	16	CML/CMC and welded steel
	Cantu-Galleano Ranch Road (east of Wineville Avenue)	1	24	CML/CMC
	Landon Drive	1	16	CML/CMC and welded steel
Sewer main	Wineville Avenue (Cantu-Galleano Ranch Road to Landon Drive)	1 ~~parallel~~ 1 ~~crossing~~	~~8 and~~ 18	Vitrified clay
	Wineville Avenue (Landon Drive to Bellegrave Avenue)	1	24	Vitrified clay
	Landon Drive	1	8	Vitrified clay
Telecommunications	Wineville Avenue	1	Not applicable	Copper; Fiber
	Landon Drive	1	Not applicable	Copper; Fiber
Underground 230-kV Transmission Line				
Potable water main	Limonite Avenue	1 ~~crossing~~	30	CML/CMC
	Pats Ranch Road	1 ~~parallel~~	~~16 and~~ 18	CML/CMC
	68th Street (west of Carnelian Street)	1 ~~parallel~~	~~8 and~~ 12	~~PVC~~ CML/CMC

Utility Type	Location	Approximate Number of Lines ~~Along Road [a] and Relation to Revised Project~~	Diameter (inches)	Pipeline Material(s)
	68th Street (east of Carnelian Street)	1	8	CML/CMC
Sewer and operational main	Pats Ranch Road (68th Street to Limonite Avenue)	2 ~~1 parallel~~	8 to 18	Vitrified clay
	Pats Ranch Road (Limonite Avenue to Boca Place)	1	12	PVC
	Pats Ranch Road (Boca Place to Bellegrave Avenue)	1	10	PVC
	68th Street (Pats Ranch Road to Wineville Avenue, 68th Street and Wineville)	2 ~~1 parallel~~	18	Vitrified clay
Gas transmission line	Limonite Avenue	2 ~~crossing~~	27 to 32	Unknown
	Wineville Avenue	1	4	Unknown
Telecommunications	Pats Ranch Road (68th Street to Limonite Avenue)	1	Not applicable	Copper; Fiber
	68th Street	1 (overhead)	Not applicable	Copper; Fiber
Distribution Line Relocation #8 ~~a~~ [a,b]				
Water Pipeline	Wilderness Avenue	1 ~~crossing~~	192	Unknown

Notes:

[a] Unless designated, utilities are underground.

[b] There are no known underground utilities near the northern riser pole where the overhead alignment transitions underground at Limonite Avenue, or at Distribution Line Relocation #7. Detailed underground utilities information was not available for the Goose Creek Golf Club; however, the golf club does operate a network of pressurized water mains and laterals for landscape irrigation.

Sources: (Johnson, 2018; Jurupa Community Services District, 2012; Jurupa Community Services District, 2013; Jurupa Community Services District, 2016; Jurupa Community Services District, 2018; Jurupa Community Services District, 2016; SoCal Gas, 2017~~; The Metropolitan Water District of Southern California, 2015~~)

Table 4.7-4 Known ~~Underground~~ Utilities Near Alternatives 1 through 4

Type	Location	Approximate Number of Lines ~~Along~~ Road [a]	Diameter (inches)	Pipeline Material(s)	Alternative
~~Alternative 1~~					
Potable water main	Wineville Avenue (north of Landon Drive)	1 ~~parallel~~ ~~3 crossing~~	~~12 to 30~~ 18	Cement mortar lined/cement mortar coated (CML/CMC) and welded steel	Alternative 1 Alternative 2 Alternative 4
	Wineville Avenue (Cantu-Galleano Ranch Road to Bellegrave Avenue)	1	30	CML/CMC and welded steel	Alternative 1 Alternative 2 Alternative 4
	Wineville Avenue (south of Park Center Drive)	1	16	Polyvinyl chloride (PVC)	Alternative 2
	Landon Drive	1	16	CML/CMC and welded steel	Alternative 1 Alternative 2 Alternative 4
	Bellegrave Avenue	1 ~~parallel~~	30	CML/CMC and welded steel	Alternative 1 Alternative 2
	Limonite Avenue	1	30	CML/CMC	Alternative 2
Raw water line	Bellegrave Avenue	1 ~~parallel~~	30	PVC	Alternative 1 Alternative 2
	Wineville Avenue (south of Bellegrave Avenue)	1	24	PVC	Alternative 2

Type	Location	Approximate Number of Lines Along Road [a]	Diameter (inches)	Pipeline Material(s)	Alternative
Sewer and operational mains	Wineville Avenue (Cantu-Galleano Ranch Road to Landon Drive)	2 ~~parallel~~ ~~5 crossing~~	18 ~~8 to 24~~	Vitrified clay~~;~~ ~~PVC~~	Alternative 1 Alternative 2 Alternative 4
	Wineville Avenue (Landon Drive to Bellegrave Avenue)	1	24	Vitrified clay	Alternative 1 Alternative 2
	Landon Drive	1	8	Vitrified clay	Alternative 4
	Bellegrave Avenue	1 ~~2 parallel~~	~~8 and~~ 18	Vitrified clay; PVC	Alternative 1 Alternative 2
	Pats Ranch Road (Limonite Avenue to Boca Place)	1	12	PVC	Alternative 1
	Pats Ranch Road (Boca Place to Bellegrave Avenue)	1 ~~parallel~~	~~10~~ 12	PVC	Alternative 1
Gas transmission line	Limonite Avenue	2	27 to 32	Unknown	Alternative 2
	Wineville Avenue	1	4	Unknown	Alternative 1 Alternative 2 Alternative 4
Telecommunications	Wineville Avenue	1	Not applicable	Copper; Fiber	Alternative 1 Alternative 2 Alternative 4
	Landon Drive	1	Not applicable	Copper; Fiber	Alternative 4
	Bellegrave Avenue	3 (overhead)	Not applicable	Copper; Fiber	Alternative 1 Alternative 2
~~**Alternative 2**~~					
~~Potable water main~~	~~Wineville Avenue~~	~~2 parallel~~ ~~4 crossing~~	~~12 to 30~~	~~CML/CMC and welded steel;~~ ~~CML/CMC~~	

Type	Location	Approximate Number of Lines Along Road [a]	Diameter (inches)	Pipeline Material(s)	Alternative
	Bellegrave Avenue	1 parallel	30	CML/CMC and welded steel	
	Limonite Avenue	1 parallel	30	CML/CMC	
Raw water line	Bellegrave Avenue	1 parallel	30	PVC	
	Wineville Avenue	1 parallel	24	PVC	
Sewer main	Wineville Avenue	3 parallel 6 crossing	8 to 24	Vitrified clay	
	Limonite Avenue	1 crossing	8	Vitrified clay	
Gas transmission line	Limonite Avenue	2 parallel	27 to 32	Unknown	
Alternative 4					
Potable water main	Wineville Avenue	1 parallel 2 crossing	16 and 18	CML/CMC and welded steel	
	Landon Drive	1 parallel	16	CML/CMC and welded steel	
Sewer main	Wineville Avenue	1 parallel 2 crossing	8 and 18	Vitrified clay	
	Landon Drive	1 parallel	8	Vitrified clay	

Note:

[a] Unless designated, utilities are underground.

Sources: (Johnson, 2018; Jurupa Community Services District, 2012; Jurupa Community Services District, 2013; Jurupa Community Services District, 2016; Jurupa Community Services District, 2018; Riverside County Flood Control and Water Conservation District, 2018; SoCal Gas, 2017)

Several of the locations identified on the map (i.e., Locations C, D, E, I, J, and K) are recently completed projects, projects under construction, or proposed for construction in the future. Some of these projects do or would have connections to utility mains. These smaller connections are not included in the existing setting because they are either not complete or are smaller connections to subdivisions. The setting is not intended to be a comprehensive list, but rather to provide a general understanding of the sizes and types of utilities in the area. Refer to Chapter 5: Cumulative Impacts of the Subsequent EIR for further information regarding cumulative impacts from the past, present, and probable future projects considered in combination with the baseline conditions, agency projections, and adopted planning documents. Two of the identified projects (i.e.,

Locations F and L) would be constructed in the probable future and were incorporated into the cumulative project list. Table 5.2-1 is revised to include these two additional projects.

Water and sewer infrastructure identified in Figure 1 of the comment attachment and in the table as "No. N" are not included in the impact analysis. The Revised Project components do not extend into the area of Van Buren Boulevard. The CPUC prepared the Initial Study Checklist (Appendix B) to identify changes in baseline conditions in order to define the scope of review for the Subsequent EIR. Components of the Proposed Project that would result in new or increased potentially significant impacts were analyzed in the Subsequent EIR. The infrastructure identified as "No. N" is located along the components of the Proposed Project that are not reanalyzed in the Subsequent EIR. Refer to MR-3 for further information regarding the scope of the Subsequent EIR.

Table 5.2-1 Cumulative Scenario Projects in the Revised Project Area

No. [1]	Project Name	Project Type	Project Components	Proximity to Revised Project	Status
28	South Archibald Plume Project	Public Infrastructure	Construction of a well and approximately 15,000 feet of 24-inch pipeline and 1,000 feet of 12-inch pipeline	Parallel to the Revised Project overhead alignment along Wineville Avenue	Final design has begun and is expected to be completed in October 2018.
29	Vernola Family Park Expansion	Recreation	Construction of a community center	Approximately 0.5 mile south of the Revised Project overhead alignment and 1 mile north of the Revised Project underground alignment	Planning phase

Comment Letter A13

City of Eastvale
12363 Limonite Avenue, Suite #910 • Eastvale, CA 91752
(951) 361-0900 • Fax: (951) 361-0888 • www.EastvaleCA.gov

May 17, 2018

Riverside Transmission Reliability Project
717 Market Street, Suite 650
San Francisco, CA 94103
riversidetrp@panoramaenv.com

Subject: **Comments on the Draft Subsequent EIR for the Southern California Edison Riverside Transmission Reliability Project (RTRP) (SCH No. 2007011113)**

Dear Mr. Uchida:

The City of Eastvale appreciates the opportunity to comment on the above referenced Environmental Impact Report (EIR). The City understands that Southern California Edison is proposing to upgrade the region's existing electrical infrastructure and improve overall electrical reliability in the Northwestern Riverside County region, which involves installing a new eight-mile 230-kV line directly east of the City of Eastvale, as well as a substation. The City previously provided comments raising a number of environmental concerns during the Notice of Preparation comment period in February 2017. The City's previous comment letter dated February 24, 2017 is attached. The City has completed a focused review of the EIR, particularly related to topics included in the City's previous letter. A13-1

The City has the following comments for consideration by Southern California Edison (SCE) on the proposed Project.

- **Aesthetics**: As noted in the City's NOP comment letter, the City is concerned about the location of the proposed Overhead Transmission Lines, as they would be highly visible from the City of Eastvale. Based on a review of the information provided in the Draft EIR, the proposed project would result in Significant and Unavoidable Aesthetic Impacts (Impact Aesthetics-C). This significant impact is illustrated in the photo simulations provided in the Aesthetics Section of the EIR. A13-2

  Although these facilities would not be located with the City of Eastvale, they would be highly visible from within the City, and from I-15, an essential gateway into the City. The Initial Study and Environmental Impact Report assert that the proposed project would not impact scenic viewsheds within the City. We dispute this assertion, and note that the proposed project would introduce transmission towers into the views of hillsides and mountains as seen from within the City, and from I-15. This impact is shown in the photo simulation of Key Observation Point 5 (KOP 5) of the Draft EIR Aesthetics Section. This would adversely impact both public and private views. A13-3

  In addition, we note that I-15 is both a prominent feature in the area, and an essential gateway to the City and currently affords expansive views that benefit residents, visitors and users of I-15. The City of Eastvale, City of Jurupa Valley, Caltrans, and WRCOG have been actively planning the A13-4

City of Eastvale
12363 Limonite Avenue, Suite #910 • Eastvale, CA 91752
(951) 361-0900 • Fax: (951) 361-0888 • www.EastvaleCA.gov

new I-15/Limonite Avenue interchange, with substantial consideration of the aesthetics of the new interchange, this location being a prominent entry into both Eastvale and Jurupa Valley. Thus, the visual character of this corridor is particularly important to the City and the residents of Eastvale. A13-4

Due to the potential extensive visual impacts that could result from the proposed Project, the City of Eastvale in opposed to the proposed project. The City would be in support of either Alternative 1 or Alternative 2, as these proposed alignments would reduce the visual impact associated with the project by installing underground electrical lines. A13-5

- **Safety/Hazards:** The City appreciates the discussion included in the Hazards and Hazardous Materials Section of the EIR (Impact Hazards-i) regarding fall hazards. While the analysis does provide a brief discussion of potential toppling of the electrical line support towers, there is still potential risk of impacts to nearby homes as well as Interstate-15. For these reasons, the City supports Alternative 1 and Alternative 2, as they would eliminate potential fall risk to both Interstate-15, as well as nearby homes. A13-6

- **Underground Alternative:** The City appreciates the inclusion of underground alternatives for the proposed project (Alternative 1 and Alternative 2). A13-7

- **Biological Resources:** The City appreciates the discussion of migratory birds and potential mortality impacts due to the location of overhead transmission lines in flyways. While mitigation was provided, the City is concerned that impacts could still occur to special status bird species. While Mitigation Measure BIO-1 does require installation of non-conductive caps and UV deflectors across the Santa Ana River, there is still potential that birds could be injured along the project site. Due to these impacts, the City once again recommends that SCE undertake either Alternative 1 or Alternative 2. A13-8

The City of Eastvale appreciates the opportunity to comment on the project and looks forward to reviewing the EIR. If you have any questions, please contact the Planning Director, Eric Norris at Enorris@eastvaleca.gov or 530-574-4875.

Sincerely,

Christine Donoghue

Christine Donoghue, Environmental Planner for
Eric Norris, Planning Director

cc: Michele Nissen, City Manager
Joe Indrawan, Deputy City Engineer

City of Eastvale
12363 Limonite Avenue, Suite #910 • Eastvale, CA 91752
(951) 361-0900 • Fax: (951) 361-0888 • www.EastvaleCA.gov

Attachment: NOP Comment Letter from the City of Eastvale dated February 24, 2017

City of Eastvale
12363 Limonite Avenue, Suite #910 • Eastvale, CA 91752
(951) 361-0900 • Fax: (951) 361-0888 • www.EastvaleCA.gov

February 24, 2017

Jensen Uchida (CPUC Project Manager)
California Public Utilities Commission
c/o Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco, CA 94111
riversidetrp@panaoramaenv.com

Subject: **Comments on the Notice of Preparation (NOP) for the Southern California Edison Riverside Transmission Reliability Project (RTRP) (A.15-04-012); (No. 1512007)**

Dear Ms. Uchida:

The City of Eastvale appreciates the opportunity to comment on the above referenced project. The City understands that Southern California Edison is proposing to upgrade the region's existing electrical infrastructure and improve overall electrical reliability in the Northwestern Riverside County region, which involves installing a new eight-mile 230-kV line directly east of the City of Eastvale, as well as a substation. The City has several environmental concerns that should be analyzed in the Environmental Impact Report (EIR) prepared for this project.

- **Aesthetics**: A review of the information provided in conjunction with the NOP indicates that the project would install new overhead transmission lines along an over 1.5 mile segment adjacent to the east side of Interstate 15 (I-15). Although these facilities would not be located with the City of Eastvale, they would be highly visible from within the City, and from I-15, an essential gateway into the City. The Initial Study asserts that the proposed project would not impact scenic viewsheds within the City. We dispute this assertion, and note that the proposed project would introduce transmission towers into the views of hillsides and mountains as seen from within the City, and from I-15. This would adversely impact both public and private views.

  In addition, we note that I-15 is both a prominent feature in the area, and an essential gateway to the City and currently affords expansive views that benefit residents, visitors and users of I-15. The City of Eastvale, City of Jurupa Valley, Caltrans, and WRCOG have been actively planning the new I-15/Limonite Avenue interchange, with substantial consideration of the aesthetics of the new interchange, this location being a prominent entry into both Eastvale and Jurupa Valley. Thus, the visual character of this corridor is particularly important to the City and the residents of Eastvale.

City of Eastvale
12363 Limonite Avenue, Suite #910 • Eastvale, CA 91752
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The EIR should consider how the project will change viewsheds from within Eastvale, and from I-15, and how the visual character of the area would be affected. We note that other segments of the alignment would be installed underground, and would encourage the segment adjacent to I-15 be similarly installed underground to preserve the important views along this corridor.

- **Safety/Hazards:** The proposed project, due to its proximity to residential developments, should be analyzed for potential safety impacts for residences within the tower "fall zone." Due to the large size of the proposed transmission lines, these potential impacts should be analyzed in the EIR. The potential for the project to impact I-15 should also be considered.

- **Underground Alternative:** We note that a portion of the project would be installed unground, and thus, this approach must be feasible. Due to the potential for negative impacts, the City recommends that an underground alternative is evaluated by the EIR. This alternative, which may be environmentally superior, would reduce the potential aesthetic/visual and safety impacts associated with the Project.

- **Biological Resources:** We note that the project would be located near I-15, a flyway for migratory birds. Thus, the impacts of these facilities on wildlife movement, and in particular migratory birds, should be considered in the EIR.

The City of Eastvale appreciates the opportunity to comment on the project and looks forward to reviewing the EIR. If you have any questions, please contact the Planning Director, Eric Norris at Enorris@eastvaleca.gov or 530-574-4875.

Sincerely,

Christine Jacobs Donoghue

Christine Donoghue, Environmental Planner for
Eric Norris, Planning Director

cc: Michele Nissen, City Manager
John Cavanuagh, City Attorney
Joe Indrawan, Deputy City Engineer
Cathy Perring, Assistant Planning Director

3.2.13 Response to Letter A13: Donoghue, Christine – City of Eastvale

A13-1 The only scoping comment from the City of Eastvale that was not directly addressed in the Draft Subsequent EIR was the comment regarding aesthetics impacts, which was adequately addressed in the certified 2013 RTRP EIR. The Revised Project would not have any greater impact on views from Eastvale than the impact of the transmission line segments that were analyzed in the certified 2013 RTRP EIR.

A13-2 The commenter's concern regarding the visibility of the revised project from viewsheds in the City of Eastvale is noted. The specific points identified regarding the Aesthetics impact analysis in the Draft Subsequent EIR are addressed in response A13-3 below.

A13-3 The comment that the proposed transmission line facilities would be visible from I-15 and certain locations within the City of Eastvale is noted. The following text has been added under Impact Aesthetics-c, "Construction," of the Subsequent EIR to note the visibility from the City of Eastvale:

> Underground transmission line construction activities including trenching, conductor duct bank and vault installation, and riser pole installation would be visible from the I-15 freeway, roadways in Jurupa Valley and entering Jurupa Valley from Eastvale, residences, and equestrian riding paths along the underground alignment.

The following analysis has been added under Impact Aesthetics-c, "Riser Pole Locations," to address the impacts on aesthetics in the City of Eastvale:

> ***Views from City of Eastvale***
> The northern riser poles would be partially visible from locations in the City of Eastvale, specifically the commercial parking lot at the Eastvale Gateway and Limonite Avenue heading east into Jurupa Valley. The riser poles would not block any views of background hillsides and mountains. As seen from Limonite Avenue, the riser poles would be skylined above the backdrop mountains, two Eastvale Gateway advertising signs, and the Edwards 14 Stadium Theater complex.
>
> Views of the northern riser poles from the parking lot of the Eastvale Gateway commercial center would be partially obstructed by landscaping. Viewer sensitivity at this location is low to moderate due to the commercial use and highly developed setting. The northern riser poles that would be viewed across I-15 would be located near existing overhead cell towers. Views to the riser poles would include an approximately 70-foot-tall Eastvale Gateway advertising sign in the immediate foreground. Viewer sensitivity on Limonite Avenue in Eastvale is low to moderate consisting of a variety of users. Views of the

riser poles for motorists travelling east on Limonite Avenue from Eastvale would be partially screened by signage, vegetation, and the approximately 40-foot-tall Edwards 14 Stadium Theater complex on the southern side of the Eastvale Gateway commercial center.

Views of the riser poles from local streets and residences, located north of the Eastvale Gateway commercial center to Bellegrave Avenue, would be blocked or interrupted by existing sound walls and berms along I-15 and landscaping. North of Bellegrave Avenue, large warehouse buildings (e.g., the four-story Amazon Fulfillment Center) block views from Milliken Avenue. ***The impact of the northern riser poles on views from the City of Eastvale would be less than significant.***

The following analysis has been added under Impact Aesthetics-c of Alternative 3 to address the impacts on aesthetics in the City of Eastvale:

Views from the City of Eastvale

The riser poles would be partially visible from locations in the City of Eastvale, specifically the Eastvale Gateway commercial parking lot and Limonite Avenue heading east into Jurupa Valley. The aesthetic impact from the Alternative 3 riser poles at these locations would be the same as that of the Revised Project riser poles (refer to Riser Pole Locations under Impact Aesthetics-c). ***The impact of the riser poles on views from the City of Eastvale would be less than significant.***

See response A13-3 below, for a response regarding I-15 as a gateway to the City of Eastvale.

A13-4 The importance of the visual character at the I-15/ Limonite Avenue interchange to the City of Eastvale is noted. The Eastvale General Plan identifies gateways (particularly from I-15) and the freeway edge as design issues worthy of analysis. No specific General Plan goals or policies are provided for the I-15/ Limonite Avenue interchange. Policy DE-10 and Action DE-10.1 call for creation of an Entryway Master Plan that, again, is not specific to the I-15/ Limonite Avenue interchange. The analysis of KOP 5 conducted for the view of the Revised Project and Alternative 3 from the I-15 and Limonite Avenue intersection determined that the impact on the visual character of this area would be significant and unavoidable.

A13-5 The commenter's opposition to the Revised Project and support of Alternative 1 and Alternative 2 is noted. The comment will be included in the administrative record and considered by the CPUC during project deliberation.

A13-6 As noted by the commenter, Section 4.7: Hazards and Hazardous Materials under Impact Hazards-i analyzes the impact on workers and the public from a

possible downed structure. The impact was determined to be less than significant. The commenter's support for Alternative 1 and Alternative 2 is noted.

A13-7 The commenter's support for Alternative 1 and Alternative 2 is noted.

A13-8 As noted by the commenter, impacts on special-status bird species were analyzed in Section 4.4: Biological Resources under Impact Biology-a. The impact was determined to be less than significant with implementation of MM BIO-02, which requires incorporation of best practices to reduce the potential for injury or mortality of raptors and other avian species by the newly constructed overhead lines. The commenter's support for Alternative 1 and Alternative 2 is noted.

Comment Letter A14

City of Arts & Innovation

May 16, 2018

Jensen Uchida
Environmental Project Manager
California Public Utilities Commission
c/o Riverside Transmission Reliability Project
717 Market Street, Suite 650
San Francisco, CA 94103
E-Mail: riversidetrp@panoramaenv.com

SUBJECT: COMMENTS ON THE DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT (SCH # 2007011113) FOR THE RIVERSIDE TRANSMISSION RELIABILITY PROJECT

Dear Mr. Uchida:

The City of Riverside thanks you and your office for your efforts in the Riverside Transmission Reliability ("RTRP") Project. We have reviewed the Draft Subsequent Environmental Impact Report ("DSEIR") and submit the following comments.

Section 4.1 Aesthetics

The DSEIR states that the Revised Project will have a significant and unavoidable Aesthetics impact due to a substantial degradation of existing visual character or quality of the site and its surroundings. But the proposed revisions to the project all appear to reduce aesthetic impacts from what was previously analyzed and approved. That is, there does not seem to be any new or increased impacts beyond what was described in the original EIR (and, to the contrary, aesthetic impacts seem to be reduced). It appears as though the DSEIR is comparing the Revised Project to the existing conditions, instead of to the previously approved project. (See pp. 4.1-43 to 4.1-46.) Thus, impacts here seem to be overstated. A14-1

We note that the aesthetic resources analysis methodology deviates from that used for the 2013 RTRP EIR. This creates an inconsistency that makes a comparison of the alternatives described in the 2013 RTRP EIR and in the DSEIR more difficult. The DSEIR should discuss how the change in methodology does or does not affect the analysis. A14-2

The DSEIR does not use the same Key Observation point ("KOP") simulation locations from the 2013 RTRP EIR, which were eliminated as noted in Table F-4 of Appendix F. Viewpoints contained in the 2013 RTRP EIR (e.g. Viewpoint 5) should be referenced as applicable in Table F-4 of Appendix F so it is clear why they were not carried forward in the DSEIR.

Table F-4 in Appendix F indicates that two KOPs (page F-6, Interstate 15) were rejected due to low - moderate viewer sensitivity, yet other low – moderate sensitivity KOPs were selected and carried forward. If the KOPs were rejected due to viewer sensitivity, we are interested to know why other low – moderate sensitivity KOPs were included in the analysis. Please include additional appropriate criteria in Table F-4 and in the analysis. A14-3

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The photo simulations do not indicate key photographic information such as date and time of photo, focal length, approximate heights of structures depicted in the simulation, approximate distance to the structures depicted in the simulation, and a precise location of the KOP at a readable scale. Figure 4.1-3: Key Observation Point Locations is at a scale that makes it difficult to determine the precise location of the photo. A14-4

Page 4.1-44 states that KOP 4 ("Vernola Park") "represents the visual change from the southwestern end of Vernola Park," but it appears to have been taken from outside of the park, on the adjacent property to the south. Actual views from within the park would be partially screened by landscaping, topography, and fencing that occupies the southern perimeter of the park. Therefore, KOP 4 photography does not depict actual views from within the park. Table F-4 indicates that more representative views from the park were rejected due to "blocking" of views by perimeter park fencing, topography, and vegetation. The description of representative views and impacts as described on page 4.1-44 and 4.1-45 should be revised to discuss the effects of fencing, vegetation and topography on actual impacts as viewed from the park, and clarification that KOP 4 also represents other sensitivities (e.g. future residential development). A14-5

The conductors/shield wires as depicted in the proposed conditions for KOP 2-Revised Project (Figures 4.1-7), KOP 3 –Revised Project (Figures 4.1-9), KOP 4 – Revise Project (Figures 4.1-11), and KOP 8 – Revised Project (Figures 4.1-19) do not appear to accurately depict conductor/shield wire visual prominence in relation to viewing distance. Figure 4.1-7 shows conductors/shield wires further from the viewpoint (in the area crossing Cantu-Galleano Ranch Road) as being more prominent than those in the foreground. Similarly, in Figure 4.1-9, conductors/shield wires appear more prominent further from the viewpoint (along Landon Drive) than those crossing directly in the foreground at a perpendicular angle across the field of view. Figure 4.1-19 shows conductors/shield wires on the north side of the Santa Ana River (further from the viewpoint) appearing as the same relative prominence and diameter as those viewed in the foreground where they cross directly overhead. A14-6

Mitigation Measure AES-01 requires that "documentation of completed revegetation shall be submitted to the CPUC for final approval within 30 days of project completion." Vegetation will not likely be established prior to project completion, but final stabilization, planting or seeding would be established. This should be clarified in the Mitigation Measure language. A14-7

Comment on RTRP DSEIR Section 4.2 Agriculture and Forestry Resources

The DSEIR states that the Revised Project will have a significant and unavoidable impact on Agricultural resources. However, as with the Aesthetic impacts, the Revised Project is actually reducing impacts to agricultural resources as compared to the previously approved project (original project impacted 1.5 acres, revised project impacts 0.4 acres). (See pp 4.2-10 to 4.2-11.) Because there does not seem to be any new or increased impacts beyond what was described in the 2013 RTRP EIR, the impact seems to be overstated. A14-8

Comments on RTRP DSEIR Section 4.3 Air Quality

Section 4.3.6, CEQA Significance Criteria, states that in the Initial Study, Impacts (a) and Impact (e) had no new significant impacts. It then goes on to discuss only Impact (e), based on response in the scoping comment. Yet Appendix B in the SEIR the Initial Study Checklist lists Impact (a) as significant. This inconsistency should be resolved. A14-9

Mitigation Measure ("MM") AQ-03 indicates that it is applicable to all proposed project locations, but the analysis only looked at the 230 kV components. As written it suggests the 69 kV project component locations are included. This must be clarified. Furthermore, this mitigation measure may be written too broadly. If the intent is to restrict 69 kV and 230 kV construction overlap, it would be beneficial to specifically list those 69 kV construction activities, such as substation grading, or foundation drilling, that cannot overlap with specific 230 kV components (vault installation, helicopter use for stringing, etc.). A broad, blanket prohibition would needlessly extend traffic, aesthetic, noise, construction, and other impacts by prohibiting contemporaneous work on both parts that would not actually cause significant impacts. A14-10

The language in MM AQ-04 specifically limits vehicle and equipment trips to "an active work site," on a single day. However, the description of impacts and use of mitigation to reduce impacts describes the use of MM AQ-04 more broadly as "used during construction in any one day." That may unintentionally, and needlessly, limit SCE's ability to construct according to schedule. A14-11

Clarification needed in Section 4.3 – 24, paragraph three. The paragraph indicates that new measures are included. However, the analysis did not look at the 69 kV project components and therefore should not replace measures in the 2013 RTRP EIR that are applicable to the 69 kV project components. In the alternative, clarify that the new measures only pertain to the 230 kV Project components. A14-12

Comments on RTRP DSEIR Section 4.13 Transportation and Traffic

Table 4.13-10: Baseline PM Peak indicates LOS at "C" for I-15 SB Ramps/Limonite. The 2017 KOA Corp. traffic report indicated this is a baseline LOS "D" which would indicate no change in the LOS for this intersection at Baseline Plus Construction Traffic. It would likely remain at LOS "D." See 2017 KOA Corp. report, Table 12. A14-13

Comment on Initial Study Contents

Finally, we note that there is no discussion in the Initial Study of Mandatory Findings of Significance, which are listed on the State CEQA Guidelines Appendix G form. A14-14

Conclusion

In addition to the comments above, we join in and support the comments submitted by SCE. The City of Riverside appreciates the effort made by the CPUC and its consultant in reviewing this matter and in working productively with Riverside and SCE. We look forward to seeing this project through to its completion in order to provide the area with the redundancy and improved resources which are so long overdue. A14-15

Sincerely,

For

Todd L. Jorgenson
Interim General Manager
Riverside Public Utilities

3.2.14 Response to Letter A14: Jorgenson, Todd – Riverside Public Utilities

A14-1 The commenter is correct that the Subsequent EIR compares the Revised Project to the existing conditions in accordance with CEQA Guidelines §15125.

The 2013 RTRP EIR analysis concluded that the proposed 2013 alignment presented significant and unavoidable aesthetic impacts. It was also stated that there were "no feasible mitigation measures to reduce the level to less-than-significant due to the contrasts caused primarily by the scale and dominance of the new structures as seen by sensitive viewers located immediately adjacent to Proposed Project" (p. 3-45). While the undergrounding alternatives presented in the Subsequent EIR do reduce the level of aesthetic impacts compared to the proposed 2013 alignment, the scale of the new riser poles and LST structures dominates the landscape. For this reason, the impacts are not overstated in the Subsequent EIR.

A14-2 The aesthetic resources analysis methodology of the certified 2013 RTRP EIR and the analysis methodology used in the Subsequent EIR are not substantially different. Both methodologies incorporate into the analysis the following criteria:

- Existing regional visual setting
- Landscape character types based on existing land uses
- Scenic quality and visual integrity
- Viewer sensitivity and viewer response
- Distance zones
- Contrast evaluations of project components relative to changes in vividness, intactness, and unity of existing conditions

While there are some terminology differences, each methodology essentially uses the same criteria that have been used for the past 40 years in visual resource analysis and are generally considered industry standards. The impact conclusions reached would be comparable. Most importantly, each impact analysis presents photo-simulations of the project to portray the degree of visual change.

In accordance with CPUC standards, the aesthetics analysis presented in the Subsequent EIR defines a clear framework used (refer to Table 4.1-6 and Appendix F) for the decision maker to understand how the impact conclusions were determined and what key viewer and visual conditions led to those conclusions.

A comparison between the alternatives in the certified 2013 RTRP EIR and the Subsequent EIR methodologies would not be beneficial because the alternatives were developed to avoid impacts for different project components. The alternatives in the certified 2013 RTRP EIR were developed for the entire Proposed Project and the alternatives in the Subsequent EIR were developed for

the Revised Project (refer to Chapter 3: Alternatives and Appendix D). Any differences between the two aesthetics methodologies would not result in pertinent changes to the alternatives impact analyses.

A14-3 Refer to MR-3 for a description of the Revised Project components. The KOPs included in the Subsequent EIR focus only on views of the visible elements of the Revised Project. Viewpoints from the certified 2013 RTRP EIR were not included if they did not include a view of a Revised Project component. Viewpoint 5 in the certified 2013 RTRP EIR portrays an overhead alignment that is not included in the Revised Project. Viewpoints 2, 3, 4, and 13 in the certified 2013 RTRP EIR show the transmission line and towers south of the Santa Ana River that are not included in the Revised Project. Table F-4 has not been revised.

Viewer sensitivity is only one criterion that was employed in the selection of KOPs to be used for photo simulations. With the exception of KOP 1 (Cantu-Galleano Ranch Road), all KOPs with simulations have either moderate or high sensitivity ratings.

KOP 1 was selected for a photosimulation because, regardless of viewer sensitivity, it best presents the visual differences between the Revised Project and Alternatives 1, 2, and 4 that involve undergrounding and a riser pole. This presentation of the visual differences allows the decision makers a comprehensive understanding of the alternatives.

A14-4 The following table and associated text has been added to Appendix F in response to the commenter's request for additional information regarding each photograph:

Table F-5 Key KOP Photographic Information

KOP	Location	Date/Time of Base Photo	Camera Type	Focal Length	Approximate Height of New Structures	Approximate Distance to Structures
1 - Revised Project	Cantu Galleano Ranch Road looking west: approximately 480 feet east of Cantu Galleano Ranch Road / Wineville Road intersection	August 10, 2017 / 12:11 pm	Canon EOS 6D	50mm	113 feet	800 feet
1 - Alternatives 1, 2, and 4	Cantu Galleano Ranch Road looking west: approximately 480 feet east of Cantu Galleano Ranch Road / Wineville Road intersection	August 10, 2017 / 12:11 pm	Canon EOS 6D	50mm	185 feet	700 feet
2 - Revised Project	Wineville Road; approximately 750 feet south of intersection with Landon Drive / Rosebud Lane.	August 10, 2017 / 3:00 pm	Canon EOS 6D	50mm	128 feet	700 feet
3 - Revised Project	East sidewalk of Horse Chestnut Street; approximately 50 feet north of intersection with Rosebud Lane	July 27, 2016 / 12:00 pm	Canon EOS 6D	50mm	128 feet	360 feet
3 - Alternative 4	East sidewalk of Horse Chestnut Street; approximately 50 feet north of intersection with Rosebud Lane	July 27, 2016 / 12:00 pm	Canon EOS 6D	50mm	165 feet	2,600 feet
4 - Revised Project	Pedestrian trail around perimeter of Vernola Park/ approximately 85 feet from Pats Ranch Road sidewalk	March 31, 2016 /11:43 am	Nikon D-50	36 mm (57.7 mm equivalent)	Riser pole: 165 feet LST: 120 feet TSP: 120 feet	Riser pole: 5,200 feet LST: 4,700 feet TSP: 3,990 feet

KOP	Location	Date/Time of Base Photo	Camera Type	Focal Length	Approximate Height of New Structures	Approximate Distance to Structures
4 - Alternative 3	Pedestrian trail around perimeter of Vernola Park / approximately 85 feet from Pats Ranch Road sidewalk	March 31, 2016 /11:43 am	Nikon D-50	36 mm (57.7 mm equivalent)	Riser pole: 165 feet TSP: 120 feet	Riser pole: 4,700 feet TSP: 3,990 feet
5 - Revised Project	Limonite Avenue north sidewalk at I-10 entrance ramp	September 21, 2017 / 7:25 AM	Canon EOS 6D	50mm	Riser pole: 165 feet LST: 120 feet TSP: 120 feet	Riser pole: 300 feet LST: 990 feet TSP: 1,750 feet
5 - Alternative 3	Limonite Avenue north sidewalk at I-10 entrance ramp	September 21, 2017 / 7:25 AM	Canon EOS 6D	50mm	Riser pole: 165 feet TSP: 120 feet	Riser pole: 1,170 feet TSP: 2,270 feet
6 - Revised Project	Pedestrian island at intersection of Pats Ranch Road and Limonite Avenue	August 10, 2017 / 2:45 pm	Canon EOS 6D	50mm	Riser pole: 165 feet LST: 120 feet TSP: 120 feet	Riser pole: 1,100 feet LST: 1,730 feet TSP: 2,270 feet
6 - Alternative 3	Pedestrian island at intersection of Pats Ranch Road and Limonite Avenue	August 10, 2017 / 2:45 pm	Canon EOS 6D	50mm	Riser pole: 165 feet TSP: 120 feet	Riser pole: 1,850 feet TSP: 2,270 feet
7 - Revised Project (by SCE)	Goose Creek Golf Club driving range	May 10, 2017 / 12:29 pm	-	50mm	Riser pole: 165 feet LST: 180 feet	Riser pole: 950 feet LST: 1,350 feet
8 - Revised Project	Pedestrian/equestrian trail/ approximately 105 feet west and downhill from proposed LST	July 27, 2017 / 9:48 am	Canon EOS 6D	50mm	Riser pole: 165 feet LST: 180 feet	Riser pole: 2,450 feet LST: 1,850 feet

A14-5 The KOP is located on the Vernola Park pedestrian trail located around the perimeter of the Park. It is located on a raised berm.

Appendix F, Table F-4 presents other locations within Vernola Park that were considered but rejected based on the basin-like topography of the park and vegetation that blocks views.

A14-6 The figures identified by the commenter (Figure 4.1-7, Figure 4.1-9, Figure 4.1-11, and Figure 4.1-19) have been revised in Section 4.1: Aesthetics to more accurately depict the visual prominence of the conductor and shield wires in relation to viewing distance. The figure edits do not change the impact conclusions.

A14-7 The text of MM AES-01 has been revised for clarity as follows:

> Documentation of completed revegetation activities, including planting container stock or seeding, shall be submitted to the CPUC for final approval ~~within~~ no later than 30 days ~~of~~ after project completion.

A14-8 Comparison between the impacts identified in the certified 2013 RTRP EIR and those in the Subsequent EIR are inappropriate because the areas of analysis for the two documents are different. Analysis of the Subsequent EIR is focused on those elements of the project which have changed subsequent to the certified 2013 RTRP EIR, and therefore the magnitude of change is inevitably different. As stated in the Section 4.2: Agriculture and Forestry Resources analysis, impacts on Prime Farmland are based on County standards, which deems any loss of primary agricultural land or farmland to be significant and unmitigable.

A14-9 The description in Section 4.3: Air Quality and Greenhouse Gas Emissions regarding which impacts would have no new impacts is accurate. The language in the Subsequent EIR indicating that Impact e) was determined to not have a new significant impact, was in reference to the Air Quality analysis in the Initial Study Checklist. Impact a), identified as not having a new significant impact, was in reference to the Greenhouse Gas Emissions analysis in the Initial Study Checklist. Clarification has been added to Section 4.3: Air Quality and Greenhouse Gas Emissions as follows:

> Note that the Initial Study Checklist found Impact e) of the Air Quality analysis and Impact a) of the Greenhouse Gas Emissions analysis to have no new significant impact.

A14-10 MM AQ-03 has been revised to allow overlapping construction activities between RPU and SCE, granted calculation evidence is provided to CPUC proving that the peak daily emissions do not exceed SCAQMD significance thresholds.

MM AQ-03: Overlap of Construction Activities (Incorporates 2013 RTRP EIR MM AQ-14)
The final project construction schedule shall be coordinated to ensure that the Conductor Installation activity shall not occur simultaneously with the TSP Foundation Installation and TSP Erection activities. Furthermore, air pollutant emissions generated during construction of SCE project components shall ~~not overlap with construction of the RPU components of the RTRP~~ be calculated with those from construction of the RPU components of the RTRP to determine which components can overlap without exceeding the peak daily SCAQMD significance thresholds. The final construction schedule and calculation evidence that the overlapping RTRP components do not exceed SCAQMD significance thresholds shall be provided to the CPUC at least 2 weeks prior to construction.
Applicable Locations: All Proposed Project locations
Performance Standards and Timing: • **Prior to Construction:** SCE shall submit a final construction schedule to the CPUC for review at least two weeks prior to construction • **During Construction:** SCE shall provide schedule updates throughout the construction process to ensure compliance with this mitigation measure • **Following Construction:** N/A

A14-11 The description of MM AQ-04 in the analysis has been revised as follows:

> MM AQ-04 requires a limitation on the number of construction vehicles and equipment used on an active work site during construction in any one day

A14-12 The language regarding mitigation measures has been clarified as follows:

> The approach to mitigation measures is different from other sections in this Subsequent EIR because the mitigation measures are all new measures, although 2013 RTRP EIR measures that pertain to the Proposed Project have been fully incorporated into the new mitigation measures. The new measures only apply to the Proposed Project, under the jurisdiction of the CPUC.

A14-13 The error in the Baseline PM peak hour LOS identified in Table 4.13-10 for study intersection I-15 SB Ramps/ Limonite Avenue has been rectified from LOS C to LOS D in Section 4.13: Transportation and Traffic.

Table 3.2-1 Changes in Level of Service with Revised Project Construction Traffic

		Baseline				Baseline Plus Construction Traffic				Change in Delay [a]	
		AM Peak		PM Peak		AM Peak		PM Peak		AM Peak	PM Peak
Number	Study Intersections	Delay [a]	LOS	Delay [a]	LOS	Delay [a]	LOS	Delay [a]	LOS		
1	I-15 SB Ramps/ Limonite Avenue	31.6	C	43.7	~~C~~ D	33.3	C	44.0	D	1.7	0.3

A14-14 The Initial Study Checklist is a CPUC planning document used to inform the scope of the Subsequent EIR. The Initial Study Checklist was not developed to satisfy a CEQA requirement for the purpose of permitting the Revised Project. Therefore, a discussion of Mandatory Findings of Significance is not required. No edits to the Initial Study Checklist or Subsequent EIR are required.

A14-15 RPU's support of the comments submitted by SCE is noted. Refer to the responses to SCE's comment letters (D1 and D2).

RWG LAW

Stephen D. Lee

T 213.626.8484
F 213.626.0078
E slee@rwglaw.com

355 South Grand Avenue
40th Floor
Los Angeles, CA 90071-3101
rwglaw.com

Comment Letter A15

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VIA ELECTRONIC MAIL, FACSIMILE & U. S. MAIL

Riverside Transmission Reliability Project
717 Market Street, Suite 650
San Francisco, CA 94103
riversidetrp@panoramaenv.com
(650)-373-1211

Re: ***Draft Subsequent Environmental Impact Report for Riverside Transmission Reliability Project (A-15-04-013) -- City of Jurupa Valley's Comments on Draft Subsequent EIR***

Dear Ms. Wilke and Mr. Uchida:

The City of Jurupa Valley (the "City") has reviewed the Draft Subsequent Environmental Impact Report ("Draft SEIR"), State Clearinghouse No. 2007011113, dated April 2018, for the Riverside Transmission Reliability Project (A.15-04-013) ("Project" or "RTRP"). The vast majority of the RTRP is located within the City; thus, the City bears the greatest burden of any environmental impacts from the RTRP.

The City appreciates the California Public Utility Commission's ("CPUC") call for further environmental review. The City further appreciates the Draft SEIR's analysis of and conclusions regarding Alternative 1, recognizing that this undergrounding alternative will mitigate many of the most significant and permanent impacts of the Project identified in the Draft SEIR and that Alternative 1 is the environmentally superior and preferred alternative, while still meeting the Project's objectives.

In furtherance of the CPUC's full and fair analysis of the RTRP and the public's informed participation, the City submits the following comments on the Draft SEIR. Based on the comments set forth below and attached hereto, the City believes that the Draft SEIR fails to fully comply with the requirements of the California Environmental Quality Act ("CEQA") (Pub. Res. Code §§ 21000, *et seq.*), and the State of California Guidelines for the California Environmental Quality Act (14 Cal. Code Regs §§15000 *et seq.*) Accordingly, the City requests that the CPUC suspend any further consideration of the Project until the Draft SEIR can be

revised and recirculated for public review and comment so that it fully discloses and analyzes the potential impacts of the Project and fully considers feasible alternatives to the Project.

The City requests and expects that responses to each comment, whether in this letter or the exhibit attached hereto, will be provided as required by and in accordance with CEQA Guidelines section 15088.

I. The Draft SEIR Fails To Adequately Analyze the Project's Environmental Impacts

A. The Draft SEIR's Aesthetic Impacts Analysis is Flawed Because the Key Observation Points ("KOP") Are Not Representative and Artificially Make the Project's Features Appear Smaller Than They Actually Are.

The Draft SEIR fails to adequately analyze aesthetic impacts because the Key Observation Points ("KOP") of the Project do not offer a representative view of the linear nature and true aesthetic impacts of the Project's transmission lines. Because transmission lines are long, linear features, when they are perpendicular to a line of sight, the transmission lines stretch across the entire horizon in a linear configuration. Those perpendicular vantage points of the linear nature of the transmission lines greatly increase their visual impact. In contrast, transmission lines viewed at oblique angles may occupy only a small part of the field of view, as the view "down the line" results in a cluster of towers apparently "stacked" on top of each other. The Draft SEIR, however, exclusively uses KOPs that view the Project from oblique angles, hiding the linear nature and true aesthetic impact of the Project. For example, to assess the linear nature of the massive transmission lines on Landon Drive, Wineville Road, and the I-15 freeway, KOPs facing the I-15 overhead line should be added to the east and west of the I-15 freeway; KOPs facing the Wineville Road line should be added to the east and west of Wineville Road; and KOPs facing the Landon Drive line should be added to the north and south of Landon Drive. KOP. Thus, the current KOPs (1-8) obscure and fail to accurately represent the true visual impact of the Project by viewing the Project from oblique angles, representing the Project's features as stacked on top of each other and artificially understating their aesthetic impact. In order to fully represent and analyze the Project's aesthetic impacts, further visual analyses of the Project must be made from KOPs that have a line of sight of the Project creating a perpendicular angle that demonstrates that true linear nature of the lines and their corresponding aesthetic impacts. A15-1

The Draft SEIR incorrectly relies on a panoramic view for KOP 7, which by the Draft SEIR's own admission, understates the Project's features, and consequently, fails to accurately represent the Project's aesthetic impacts. Specifically, the Draft SEIR concedes that KOP 7 uses a panoramic view that diminishes the Project's features: "however, project facilities appear smaller in a panoramic simulation due to the nature of baseline photography." (Draft SEIR 4.1-39 fn. 2.) Artificially diminishing the Project's features, especially when they include steel lattice towers and tubular steel poles that can be up to 120 feet and 170 feet tall, respectively, A15-2

unfairly understates the truly massive features of the Project and their corresponding aesthetic impacts. Thus, in order to fairly analyze the Project's aesthetic impacts, the Draft SEIR cannot rely on panoramic views that make project facilities appear smaller than they actually are. A15-2

Significantly, even with the Draft SEIR's reliance on flawed KOPs that do not fully depict the extent of the Project's aesthetic impacts, the public's collective shock and gasp at the immensity of the Project's aesthetic impacts from even these deficient photo simulations during the April 24, 2018 public information meeting on the Draft SEIR emphasizes the importance of the Project's enormous and permanent aesthetic impacts and the need for representative KOPs. A15-3

B. The Draft SEIR's Aesthetic Impacts Analysis Is Flawed Because It Relies on Unrepresentative and Limited Photo Simulations That Do Not Accurately Frame the Project's Aesthetic Impacts

The Draft SEIR also fails to adequately analyze the Project's aesthetic impacts because the photo simulations do not indicate the distance between the viewer and the Project components for each KOP and do not describe the viewer's elevation. Both components are necessary to obtain accurate and representative analyses of the Project's aesthetic impacts. The distance from the KOP to a specified point in the project (e.g. a riser pole or steel lattice tower) should be mapped and indicated at a scale sufficient to clearly show their relationship to the Project site and to the surrounding landscape. However, there is no description of the distance between the viewer and the power line structures, which is particularly significant for KOPs 7 and 8 given their location in a golf course and an open space area, to accurately frame the aesthetic impacts of the Project's features. Likewise, the Draft SEIR relies upon a flawed aesthetics analysis because there is no description of the viewer's elevation and the viewer's height from each KOP. The viewer's elevation, or observer position, is necessary to determine whether the viewer is elevated with respect to the facility and therefore looking downward at it, lower in elevation than the facility and therefore looking upward at it, or level with the facility and looking across the landscape at it. The viewer's height also effects the viewshed analysis and must be included as one component of the viewpoint elevation. Accordingly, the visual simulations in the Draft SEIR should be based on accurate spatial information regarding the viewer's elevation relative to the Project components so that the aesthetic impacts of the Project can be properly analyzed. A15-4

The Draft SEIR's aesthetics analysis incorrectly relies upon photo simulations that do not show the height of Project components or existing features in the surrounding area for proper reference and accurate viewshed analysis. The height of the Project's features from each KOP must be accounted for to accurately and fairly represent the scale of the Project's aesthetic impacts, especially in relation to the features in the surrounding area. The Draft SEIR, however, does not permit such an accurately-framed and representative analysis because it does not show the height of the Project's proposed facilities in each KOP or the height of surrounding

features, such as the existing riser poles and steel lattice towers in KOPs 1, 7, and 8. Indeed, a map, similar to the observation point locations, that shows the locations of all the towers with the respective heights of those facilities should be included. A15-4

The Draft SEIR does not provide a complete analysis of the Project's aesthetic impacts to particularly sensitive areas, including the Goose Creek Golf Course and the open-space horse trail in Norco along the Santa Ana River. For areas such as these, where there are large tracts of undeveloped land with dispersed recreational and trail uses where visitors may congregate, the Draft SEIR's reliance on only two KOPs is misplaced. Instead, the Draft SEIR should have considered more KOPs for particularly sensitive areas to show the range of potential contrast that might be observed. The narrow and limited selection of KOPs here limits the CPUC's, the public's, and the interested parties' full review and knowledge of the full range of visual impacts from the Project. Indeed, such a limited selection of KOPs may bias the aesthetics impact assessment by not showing or fully disclosing important impacts. Thus, because of the particularly sensitive nature of the views from KOPs 7 and 8, more KOPs to these sensitive areas should have been provided. A15-5

Finally, the Draft SEIR's aesthetic analysis relies on flawed representations of the Project's facilities that are inconsistent with the visual simulations provided. Specifically, the Project Description provides drawings of lattice steel towers, tubular steel poles, and transmission line riser poles that are not drawn to scale. (Draft SEIR 2-6 through 2-8.) In order to accurately evaluate the photo simulations of the Project's features, the Draft SEIR must include scale drawings of the Project's facilities. Similarly, the drawings that are provided are misleading because they do not align with what is represented in the photo simulations. For example, when comparing the riser pole depicted in Figure 2.2-4 and the riser poles in KOP 8, the base of the pole is much longer in length in KOP 8 than what is shown in Figure 2.2-4. Accordingly, the Project should be analyzed using scale drawings that are consistent with the visual simulations provided. A15-6

C. The Draft SEIR's Land Use and Planning Analysis is Flawed Because It Incorrectly Concludes That There Will Be No Impacts From the Project.

The Draft SEIR incorrectly concludes that there will be no impacts from the Project, despite the undisputed inconsistency between the Project and local and federal land use regulations. Preliminarily, the Draft SEIR bases its no-impact finding upon California Constitution Article XII, Section 8 and the Public Utilities Code § 1001: A15-7

> "Pursuant to the California Constitution Article XII, Section 8, as enacted through PUC 1001, the CPUC has sole and exclusive jurisdiction over the siting and design of SCE transmission facilities. Consequently, no local land use plans, policies, or regulations requiring discretionary approval would apply to the Revised Project. ***Therefore, because of the specific authority granted to the CPUC in regard to***

applicable plans, polices and regulations for transmission facilities the revised project would result in No Impact.

(Draft SEIR p. 4.9-17 [emphasis and italics in original].) California Constitution Article XII, Section 8 grants the CPUC exclusive regulatory power over utilities: "A city, county, or other public body may not regulate matters over which the Legislature grants regulatory power to the Commission." Likewise, Public Utilities Code § 1001 provides, in relevant part, that no electrical utilities corporation shall be required "to secure such certificate for an extension within any city or city and county within which it has theretofore lawfully commenced operations."

Significantly, neither California Constitution Article XII, Section 8 nor the Public Utilities Code § 1001 authorizes or compels a no-impact finding regarding the Project's local land use impacts. The foregoing authorities merely stand for the proposition that the CPUC has exclusive jurisdiction over the regulation and control of utilities. (See *Anchor Lighting v. Southern California Edison Co.* (2006) 142 Cal.App.4th 541, 548; see also *Leslie v. Superior Court* (1999) 73 Cal.App.4th 1042, 1046 ["counties may not enforce local regulations that conflict with rules and regulations of the PUC."].) Exclusive jurisdiction, however, does not mean that the either the CPUC or the Project applicants may abdicate their legal responsibilities of complying with CEQA and federal regulations in conducting a full and fair environmental review of the Project. Indeed, there is no logical or legal basis for concluding that simply because the CPUC has exclusive jurisdiction that there is no impact from the Project on local land use consistency. In fact, as demonstrated in Appendix J, the Draft SEIR concedes that the Project is actually inconsistent with several local land use regulations, confirming the opposite conclusion -- that the Project will have significant impacts on land use and planning. Accordingly, the Draft SEIR incorrectly concludes that there is no impact from the Project on land use consistency when that conclusion is unsupported by the Draft SEIR's cited authorities and is flatly contradicted by the Draft SEIR's own analysis in Appendix J. A15-7

Although Appendix J attempts to analyze land use consistency, it incorrectly concludes that there is no feasible mitigation to reduce the significant impacts on City views: Construction of overhead transmission structures would have a significant impact on views from residential streets, as described in greater detail in Section 4.1: Aesthetics. There is no feasible mitigation to reduce this impact." (Draft SEIR, Appendix J.) This conclusion is incorrect and contradicted by the Draft SEIR's own findings. Specifically, undergrounding is a feasible mitigation to reduce what would otherwise be significant aesthetic impacts to a less than significant level. Indeed, the Draft SEIR confirms that undergrounding portions of the 230 kV transmission line is both feasible and the preferred alternative because undergrounding "would avoid significant aesthetic impacts from riser poles and overhead transmission lines." (Draft Subsequent EIR ES-12, ES-13, ES-20.) Accordingly, the Draft SEIR does not correctly conclude and does not sufficiently analyze the feasible mitigation provided by undergrounding for reducing the Project's significant impacts to a less than significant level.

D. The Draft SEIR's Land Use and Planning Analysis is Flawed Because It Incorrectly and Prematurely Concludes That There Will Be No Impact From the Project on the Hidden Valley Wildlife Area ("HVWA").

The Draft SEIR also incorrectly and prematurely concludes that no land use consistency impacts would occur from the Project's Distribution Line Relocations #7 and #8 in the Land and Water Conservation Fund ("LWCF") area. (Draft SEIR 4.9-17.)

This conclusion is incorrect and unsupported by any of the required analysis that must be made at the federal level for the National Park Service's ("NPS") decision on the location of transmission lines in the Hidden Valley Wildlife Area ("HVWA"). Indeed, as explained in further detail in the attached Exhibit A, the placement of massive overhead utility lines and structures - up to 170-feet in height - throughout areas in the HVWA that have been specifically designated for open space and recreation use is flatly inconsistent with the LWCF Act and federal land use policies. (See LWCF Manual 3-4.) Indeed, even the Draft SEIR confirms that above-ground utilities are not permitted in the HVWA and on LWCF lands: "Aboveground utilities are not an approved use of LWCF lands and would require a conversion request and NPS approval." (Draft SEIR 4.9-12.) Accordingly, the Draft SEIR incorrectly concludes that there will be no impact from the Project's Distribution Line Relocations #7 and #8, which contemplates overhead lines that are not permitted in the absence NPS approval and conversion, which has not occurred.

In order to obtain approval from the NPS for the relocation of transmission lines in the HVWA, a Project Description-Environmental Screening Form and appropriate National Environmental Policy Act ("NEPA") review as required by the NPS must be submitted as part of the Conversion Area and Replacement proposal review process. Indeed, under 42 U.S.C.A § 4332, NEPA requires a detailed statement regarding the environmental impact of the proposed action; any adverse environmental effects which cannot be avoided should the proposal be implemented; alternatives to the proposed action; and any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented. Thus, to fully analyze the Project's impacts, unavoidable adverse environmental effects, and alternatives under the applicable federal regulatory standards, an analysis of the Project's Distribution Line Relocations #7 and #8 must be made. No such analysis appears in in the Draft SEIR, the 2011 Draft EIR, or the 2013 Final EIR, making it premature for the Draft SEIR to merely conclude that there will be no impact from such line relocations or conversions of federally-designated open space and recreational lands for utilities.

A15-8

For example, under NEPA and as required for NPS approval of the Project's location of transmission lines within the HVWA, an analysis of the environmental impacts from and alternatives to the proposed transmission line locations must be provided. Significantly, however, none of the environmental review documents for the RTRP analyzes the feasibility and alternatives for undergrounding in the HVWA. The analysis of and conclusions on the

viability of undergrounding in the 2011 and 2013 EIRs have been flatly contradicted by and superseded in the 2018 Draft SEIR, which confirms the feasibility of, official preference for, and environmental superiority of undergrounding portions of the RTRP line. Accordingly, an analysis of undergrounding for the HVWA and the Project's transmission line locations south of the Santa Ana River must be conducted because undergrounding is now not only feasible and environmentally superior but also would reduce significant and permanent aesthetic impacts of the Project that would otherwise be immitigable. Indeed, and as further explained in Exhibit A, the LWCF Act specifically authorizes undergrounding the Project's utility lines in the HVWA, and the LWCF Program even provides funding for such undergrounding. In light of the significant environmental review that must occur at the NEPA and NPS level, the environmental review of the Project here should also proceed contemporaneously with that environmental review -- not precede it -- because the NEPA analysis, the environmental review of undergrounding in the HVWA, and any decisions by the NPS could drastically influence the CPUC's decisions here. A15-8

In addition, as part of the analysis of the land swap, conversion, and placement of transmission lines in the HVWA and south of the Santa Ana River for NEPA and NPS compliance, the CPUC should not rely on the deeply flawed photo-simulations in the 2011 and 2013 RTRP EIRs. While the current KOPs for the Revised Project in the Draft SEIR are by no means perfect, the photo simulations in the 2011 and 2013 EIRs are grossly inadequate. For example, photo simulation viewpoint 1 (2013 Final EIR 3-23) was taken a mere 75 feet away from the Project, hiding the true height of the transmission line poles as the view of the nearest pole is cut off far before reaching the top of the pole. Likewise, the photo simulations for the transmission line south of the Santa Ana River incorrectly use oblique angles to obscure the full aesthetic impact of the Project and do not include representative photo simulations from both the north and south sides of the proposed line to demonstrate the massive linear nature of the line from the perspectives of residents in Jurupa Valley and the City of Riverside. These photo simulations obscure the Project's true aesthetic impacts, rely on a faulty methodology, and fail to accurately portray the full scale and scope of the Project south of the Santa Ana River. Accordingly, the City urges the CPUC to refrain from relying on the faulty visual simulations in the 2011 and 2013 EIRs for the transmission line south of the Santa Ana River and instead, call for new visual simulations to be made according to the comments above. A15-9

Thus, the Draft SEIR's conclusion that there is no impact from the Project's Distribution Line Relocations #7 and #8 is baseless and grossly premature, presuming an analysis and outcome at the federal level that has not yet occurred. The federal environmental review for the Project and the environmental review by the Riverside County Regional Park and Open-Space District, as part of NEPA obligations and NPS review of the HVWA, should occur contemporaneously with the CPUC's review and decision-making, because the NEPA analysis, the environmental review of undergrounding in the HVWA, and the results from any decisions by the NPS could materially impact the CPUC's decisions here. A15-10

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E. The Draft SEIR's Recreation Impacts Analysis is Flawed

The Draft SEIR incorrectly concludes that the operation and maintenance of the Project will have no impact on recreation. (Draft SEIR Table 4.12-3.) However, the placement of massive, overhead transmission lines in areas designated for recreation and open space would irreparably harm and impact recreational opportunities. As hinted in the photographic simulations of the Project, the Project would drastically impair the views of scenic vistas and would convert open space and recreational lands for utility use. Thus, the Project would result in significant recreation impacts because maintaining and operating permanent transmission fixtures that are up to 170 feet high would irreparably and permanently harm the views, use, and enjoyment of recreational opportunities in the area. A15-11

II. The Draft SEIR Fails To Adequately Analyze Feasible Alternatives.

The Draft SEIR fails to adequately consider and incorrectly eliminated Alternative 8, which would underground all segments of the RTRP transmission line. Despite eliminating this feasible alternative on the grounds that it would result in substantially greater environmental impacts than the Project (Draft SEIR 3-11), a comparison of Alternative 8's potential environmental impacts confirms that it is the environmentally superior alternative. A15-12

- Aesthetics: undergrounding the entire transmission line would avoid the Project's long-term significant and immitigable aesthetic impacts because Alternative 8 would remove all of the massive, overhead transmission lines; A15-13
- Agriculture: Alterative 8 would avoid impacts on important farmlands by locating the proposed transmission lines within a disturbed roadway and within an area where there is no important farmland, resulting in "no impact"; A15-14
- Noise: Alternative 8 would not involve construction in proximity to more residences than the Revised Project or Alternative 1. Impacts would likely be less than significant with mitigation, or at a minimum, no greater than the Revised Project; A15-15
- Traffic: Alternative 8 would not involve any road closures as a result of traversing through the HVWA, and would likely be comparable to the traffic impacts imposed by the Revised Project or Alternative 1; A15-16
- Alternative 8 admittedly meets the basic project objectives: (i) increase capacity to meet existing and future load growth and (ii) provide an additional point of delivery for bulk power into the RPU electrical system (Draft SEIR 3-4 and 3-11); A15-17
- Potentially feasible from economic, environmental, legal, social, and technological standpoints: undergrounding significant portions of the RTRP is not A15-18

only feasible but also the preferred and environmentally superior option among all other alternatives for the RTRP. CEQA Guidelines Section 15126.6(b) requires consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may "impede to some degree the attainment of the project objectives, or would be more costly". The Court of Appeal determined in *Citizens of Goleta Valley v. Board of Supervisors* (1988): "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." Significantly, Alternative 8 was not eliminated due to economic feasibility and no evidence has been provided that the cost of undergrounding of the power lines is sufficiently severe as to render it impractical to proceed with the project.

A15-18

- Avoids or substantially lessens any significant effects of the Revised Project: Alternative 8 would reduce the most significant and permanent impacts of the Revised Project -- particularly with respect to Aesthetics, Land Use, and Recreation. Any significant impacts that would be imposed by Alternative 8 would be in line with impacts expected from the Revised Project or Alternative 1 and significantly, would be temporary in nature. For example, any air quality, greenhouse gas, cultural resources, or biological impacts would only be temporary while the lines are installed and constructed; mitigation can restore the surrounding areas and render any impacts temporary, while reducing their significance.

A15-19

In addition, Alternative 8 would meet the CPUC's requirements under Public Utilities Code § 1002. Specifically, Public Utilities Code § 1002 imposes criteria for certification, including:

"(1) Community values.

(2) Recreational and park areas.

(3) Historical and aesthetic values.

(4) Influence on environment, except that in the case of any line, plant, or system or extension thereof located in another state which will be subject to environmental impact review pursuant to the National Environmental Policy Act of 1969 (Chapter 55 (commencing with Section 4321) of Title 42 of the United States Code) or similar state laws in the other state, the commission shall not consider influence on the environment unless any emissions or discharges therefrom would have a significant influence on the environment of this state."

A15-20

The Revised Project is not consistent with community values, recreational and park areas, historical and aesthetic values, and influence on the environment. As identified in the Jurupa Valley General Plan, community values center on providing a healthy living and working environment for the City's citizens. While the Project is viewed as a utility, its inherent characteristics make it an industrial land use that is at odds with the espoused community values, recreational and park areas, and historical and aesthetic values in the City: protecting the Santa Ana River and river plain, ridgelines, and hillsides for their exceptional value for recreation, watershed, wildlife habitat, environmental health, and as scenic backdrops for the City; preventing and removing visual blight; protection of public vistas; and community awareness and beautification activities to protect maintain, and promote the City's unique character, instill local pride, and encourage tourism. The Project would create further blight in the City, permanently remove and degrade recreational and park areas, and permanently damage the historical and aesthetic values through the permanent placement of massive, overhead transmission lines. This would result in a lasting and negative influence on the environment. However, as demonstrated above, Alternative 8 would preserve community values, recreational and park areas, and historical and aesthetic values by replacing massive overhead transmission lines with underground ones. Indeed, as demonstrated above, Alternative 8 would be the environmentally superior alternative because it would remove the Project's significant and permanent environmental impacts on aesthetics, land use, and recreation.

A15-21

III. The Draft SEIR Fails to Analyze the Project's Environmental Justice Impacts

Despite placing a significant environmental and economic burden on the City's residents, where much of the massive overhead transmission lines are planned to be located according to the revised Project, the Draft SEIR fails to provide any analysis of the Project's environmental justice impacts.

Social and economic factors play an important and explicit part of the CEQA review process. The Legislature stated the intent of CEQA is in part to "[c]reate and maintain conditions under which man and nature can exist in productive harmony **to fulfill the social and economic requirements** of present and future generations." (Pub. Resources Code § 21001(e) [emphasis added].) Significantly, the economic and social effects of a project's physical changes to the environment may be considered in determining that the physical change is a significant effect on the environment. (CEQA Guidelines § 15064(e) ["If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect"]; CEQA Guidelines 15131(b) ["economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment"].)

A15-22

The CEQA Guidelines illustrate how a physical change to the environment can be a significant impact based on the social or economic impact of that physical change: "For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant." (CEQA Guidelines § 15131 (b); see also CEQA Guidelines § 15382 ["A social or economic change related to a physical change may be considered in determining whether the physical change is significant"].)

Accordingly, an agency is required to find that a "project may have a 'significant effect on the environment'" if, among other things, "[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." (Pub. Res. Code § 21083(b)(3).) An indirect effect that requires CEQA analysis can be an economic one: if a proposed development project may cause economic harm to a community's existing businesses, and if that could in turn "result in business closures and physical deterioration" of that community, then the agency "should consider these problems to the extent that potential is demonstrated to be an indirect environmental effect of the proposed project." (See *Citizens for Quality Growth v. City of Mt. Shasta* (1988) 198 Cal.App.3d 433, 446.)

Here, the RTRP will cause physical changes to the environment that have massive social and economic impacts on the City's residents. The Project is an immense utility use that perpetuates further industrial uses by encroaching upon and destroying the viability of residential, commercial, and open space uses in the City. Over 75% of the City's residents are low and median-income minorities. These disadvantaged residents would unfairly bear the brunt of the Project's impacts because much of the Project's overhead alignment is located in the City. These are the residents who will be deprived of housing, economic, and recreational opportunities as the Project's physical changes to the environment would result in irreparable social and economic impacts to the residential, commercial, and open space land uses in the City. Future commercial and residential developments simply will not seek to locate within the vicinity of massive, overhead transmission lines, and the value of existing nearby commercial and residential uses would be greatly diminished. Put simply, the social and economic impacts of the Project are dire: the City would lose further construction and development of residences and businesses; the value of existing residences and businesses in the area of the RTRP will be greatly diminished; and the City will lose future residents whose buying power would be a catalyst for new retail and commercial development that would provide necessary tax revenue and critical jobs for the community.

A15-22

In December 2015, Urban Futures, Inc. prepared an Economic/Fiscal Impact Analysis of the RTRP's impacts on the City, which confirms that the RTRP will devastate the value of the City's most important assets and cause tremendous harm to the economic viability of the City. The City's planned development projects along the I-15 corridor, where the RTRP seeks to locate massive, overhead transmission lines and towers, are crucial for the City's sustainability and economic livelihood. The breadth of development that would take place along the I-15

A15-23

represents the City's greatest economic asset and the greatest opportunities for economic development throughout the entire City. However, a 100-foot-wide no-build-zone along the City's frontage properties to accommodate the location of transmission towers and lines along the I-15 freeway would seriously impair the ability of the City and private property owners to fully develop and leverage the property along the I-15 freeway. Thus, the RTRP would preclude the City from fully developing the I-15 corridor and, in so doing, cripple the City's ability to address its current budget deficit, leading to the depletion of reserves, fiscal insolvency, and potential bankruptcy or disincorporation of the City, itself. A15-23

Because the RTRP's physical changes to the environment result in severe social and economic impacts on the City's residents, the Draft SEIR should have analyzed the Project's environmental justice impacts.

IV. The Draft SEIR is So Fatally Flawed That Recirculation is Required

CEQA requires that an EIR be recirculated when "significant new information is added to the EIR" prior to certification of the document. *See* CEQA Guidelines § 15088.5. "Significant new information" includes a disclosure that the "draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." (*Id.*)

For all of the reasons discussed above, the Draft SEIR's inadequacies constitute a serious and significant failing of the process, and run counter to CEQA's mandate that an "EIR is to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action." (CEQA Guidelines, § 15003(d).) A15-24

The City therefore objects to any further action on the Project until the necessary and proper environmental review has been completed and the public has been provided a meaningful opportunity to comment.

V. Conclusion

In furtherance of the full analysis of the Project's impacts and alternatives and in an effort to promote full and informed public participation, the City appreciates this opportunity to comment on the Draft SEIR and the CPUC's further environmental review of the Project. The City also appreciates the past efforts, and looks forward to the further diligence and responses, of the CPUC and Panorama in working with the many public and private entities and concerned public regarding the Project.

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Very truly yours,

Stephen D. Lee

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EXHIBIT A

RWG LAW

Stephen D. Lee

T 213.626.8484
F 213.626.0078
E slee@rwglaw.com

355 South Grand Avenue
40th Floor
Los Angeles, CA 90071-3101
rwglaw.com

April 23, 2018

VIA ELECTRONIC MAIL & U. S. CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Riverside County Regional Park and Open-Space District
C/O Darrin Gilbert
POWER Engineers
731 East Ball Road
Anaheim, California 92805
RTRP-LWCF@powereng.com

Riverside County Regional Park and Open-Space District
Attn: Scott Bangles, Park Director/General Manager
4600 Crestmore Road
Jurupa Valley, California 92509

Re: ***The City of Jurupa Valley's Comments in Response to Riverside County Regional Park and Open-Space District's March 23, 2018 Request for Public Comment re: Hidden Valley Wildlife Boundary Change***

Dear Mr. Gilbert and Mr. Bangles:

The City of Jurupa Valley (the "City") has reviewed and submits the below comments in response to the Riverside County Regional Park and Open-Space District's ("District") March 23, 2018 Request for Public Comment on the proposed conversion, replacement, and boundary changes to the Hidden Valley Wildlife Area ("HVWA") in conjunction with the Riverside Transmission Reliability Project ("RTRP").[1]

The RTRP would affect approximately 10.8 acres of HVWA land funded by the Land and Water Conservation Fund ("LWCF"). The LWCF was established by Congress with the specific goal of safeguarding natural areas, water resources, cultural heritage, and recreational opportunities. The RTRP, however, seeks to construct massive 230 kV transmission lines and

[1] The District's proposal to alter the boundaries of and convert lands within the HVWA is referred to as the "Project."

facilities, including steel lattice and pole structures up to 170-feet in height, that will traverse the HVWA.

Consequently, the RTRP and the Project seek to place massive, above-ground electric utility structures on land that has been specifically acquired and designated for open space and recreational uses. For the reasons demonstrated below, the District should fully and independently analyze the impacts of and alternatives to the Project to address the Project's numerous deficiencies and the public's significant concerns:

- The District must independently analyze undergrounding the RTRP in the HVWA and cannot rely on the obsolete 2011 Draft Environmental Impact Report ("EIR") and 2013 Final EIR because those documents incorrectly presume that undergrounding is infeasible when, in fact, the California Public Utilities Commission and the RTRP applicant have conceded undergrounding is both feasible and the environmentally superior alternative for the RTRP.
- The District must fully and independently analyze the contemplated replacement of LWCF lands prior to making a decision on the Project to ensure that the lost LWCF land is adequately compensated by and replaced with land that is comparable in use, value, and location.
- The LWCF Program specifically authorizes and provides funding for undergrounding options that the District must explore and analyze.
- The District has not demonstrated that it has complied with the requirements of the LWCF Act, specifically the requirements under 36 CFR § 59.3, for approval of the Project.
- The Project is inconsistent with state and federal land use policies.
- The District must comply with the scoping requirements for the Project's Environmental Screening Form by meaningfully engaging the public and local government, in the scoping process.
- The District cannot abdicate the District's independent review and decision-making obligations to the RTRP applicant through its consultant, POWER Engineers.

I. The District Cannot Ignore Its Legally-Required Duties of Fully Analyzing the Project By Relying on the Outdated 2011 Draft EIR and 2013 Final EIR.

The District cannot rely on the 2011 Draft EIR and 2013 Final EIR for an analysis of the Project's impacts on LWCF lands because those environmental reports are obsolete and do not

analyze impacts of the Project and the RTRP, including feasible alternatives, according to the drastically-altered baseline conditions and presumptions that are now presented.

A. The District Must Independently Analyze the Feasibility, Impacts, and Alternatives of Undergrounding All or a Portion of the RTRP in the HVWA.

Because the analysis of and conclusions on the viability of undergrounding in the 2011 and 2013 EIRs have been contradicted by and superseded in the 2018 Subsequent Draft EIR, the District must independently analyze the feasibility, impacts, and alternatives of undergrounding for the HVWA. Indeed, the RTRP applicant and the Subsequent Draft EIR now both concede, contrary to the 2011 and 2013 EIRs, that undergrounding significant portions of the RTRP is not only feasible but also the preferred and environmentally superior option among all other alternatives for the RTRP. This constitutes a major change in the baseline presumptions and conditions for the RTRP and the Project. Thus, the District cannot now rely on the outdated analysis and conclusions of the 2011 and 2013 EIRs and must independently review the impacts, feasibility, and alternatives of undergrounding the RTRP alignment that traverses through the HVWA.

The California Environmental Quality Act ("CEQA") requires subsequent environmental review, including a subsequent EIR, when new information shows that mitigation measures previously found to be infeasible would in fact be feasible and would substantially reduce one or more significant impacts:

> "New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete . . . shows any of the following: . . . (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project."

(Cal. Code Regs., tit. 14, § 15162(3).) Likewise, a public agency cannot use an EIR from an earlier project for a later project if the EIR would not adequately describe alternatives and mitigation measures related to each significant effect. (CEQA Guidelines § 15153.)

Here, new information of substantial importance -- the feasibility of, official preference for, and environmental superiority of undergrounding portions of the RTRP line -- has been presented, requiring that the District analyze undergrounding for the HVWA. Specifically, the 2018 Subsequent Draft EIR confirms that undergrounding portions of the 230 kV transmission line is both feasible and the preferred alternative because undergrounding "would avoid significant aesthetic impacts from riser poles and overhead transmission lines between Cantu Galleano Ranch Road and Limonite Avenue." (Draft Subsequent EIR ES-12, ES-13, ES-20.) This new information starkly contrasts with the outdated conclusions and analysis in the 2011 and

2013 EIRs, which rejected undergrounding even limited portions of the RTRP line as infeasible: "In all, then, undergrounding even a limited portion of the Project as a means of potential mitigation is both infeasible and environmentally more damaging than the currently proposed Project's overhead lines." (Draft EIR 3-54; Final EIR 3-41 [Volume II Revised Draft EIR].) Indeed, the Final EIR specifically and incorrectly concluded that "undergrounding even limited sections of the Project's 230 kV transmission line as a means of potential mitigation is infeasible." (FEIR 3-322 [Volume II Revised Draft EIR].) Because the Subsequent Draft EIR confirms that undergrounding portions of the RTRP's 230 kV transmission line is feasible and the environmentally superior alternative, new information has been presented regarding the viability of undergrounding that the District must now analyze for the HVWA. Indeed, because the 2011 and 2013 EIRs incorrectly rejected undergrounding even a portion of the RTRP as infeasible, the District cannot rely on the obsolete 2011 and 2013 EIRs in evaluating undergrounding for the HVWA.

The District must analyze undergrounding for the HVWA and the Project because undergrounding is now not only feasible and environmentally superior but also would reduce significant aesthetic impacts that would otherwise be immitigable. The 2011 Draft EIR confirms that the visual impacts of massive overhead 230 kV transmission lines would be greatest in the HVWA and LWCF areas: "where visual impacts of the overhead line are greatest (the Santa Ana River corridor, including the Santa Ana River Trail and Hidden Valley Wildlife/LWCF areas)." (DEIR 6-30.) The Draft EIR concluded that the significant aesthetic impacts of overhead transmission lines in the HVWA would be immitigable: "[the] Hidden Valley Wildlife area to the west . . . impacts on views from this area would be potentially significant and immitigable, as they would degrade the visual character and quality of the interface of residential, recreational, and the Santa Ana River's trails and open space uses." (Draft EIR 3-54.) Likewise, the Final EIR confirms that "[s]ome visual impacts are significant, unavoidable and immitigable" regarding the HVWA. (Final EIR 2-201.) Undergrounding, however, has been demonstrated to be a viable mitigation measure and would provide the greatest aesthetic benefit, reducing what were significant and previously thought-to-be immitigable impacts, by removing overhead utility lines: "**The aesthetic appeal to a vista without the interruption of utility lines is the most recurring benefit** stated regarding underground transmission lines." (DEIR 6-30 [emphasis added].) Because undergrounding portions of the RTRP in the HVWA would drastically reduce significant aesthetic impacts of the RTRP and the Project, the District must analyze the impacts, feasibility, and alternatives for undergrounding in the HVWA. To accurately depict the aesthetics analysis of undergrounding, the District also must include detailed view simulations regarding undergrounding and its alternatives in the HVWA.

In addition to the requirements for complying with CEQA, the District also must analyze the impacts and feasibility of undergrounding pursuant to the District's National Environmental Policy Act ("NEPA") obligations. Specifically, in order to obtain Project approval from the National Park Service ("NPS"), the District must submit a Project Description-Environmental

Screening Form and appropriate NEPA review as required by the NPS as part of the Conversion Area and Replacement proposal review process. Indeed, under 42 U.S.C.A § 4332, NEPA requires that the District must provide a detailed statement the environmental impact of the proposed action; any adverse environmental effects which cannot be avoided should the proposal be implemented; alternatives to the proposed action; and any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented. To fully analyze the Project's impacts, unavoidable adverse environmental effects, and alternatives under the District's NEPA obligations, the District must include an analysis of the impacts, feasibility, and alternatives for undergrounding in the HVWA.

B. The District Must Fully and Independently Analyze the Contemplated Replacement of LWCF Lands Prior to Making a Decision on the Project.

Because neither the 2011 Draft EIR nor the 2013 Final EIR analyzes the contemplated replacement of LWCF lands, the District must analyze the impacts of and alternatives for any loss and replacement of LWCF lands. Specifically, the District proposes to substitute a "similarly sized contiguous portion of a parcel (#153240030-6) . . . to compensate for the loss of recreational function within the park." (District's Request for Public Comment.) The 2011 Draft EIR and 2013 Final EIR, however, do not present any analysis of this proposed land exchange. Neither environmental document analyzes the specific characteristics, use, or value of the LWCF land that will be lost with the specific characteristics, use, and value of the contemplated parcel with which the LWCF land will be replaced. Without such an analysis and comparison, including detailed view simulations and use comparisons, the District cannot demonstrate and the public cannot be assured that the loss of any LWCF land will be adequately compensated with the land from parcel #153240030-6. Indeed, merely accepting the District's proposal at this stage threatens to exchange beautiful open space and recreation land for pennies on the dollar. Furthermore, the District has not analyzed any of the alternatives to replacing LWCF lands with parcel #153240030-6. Without such an analysis, the District cannot demonstrate and the public cannot be assured that other parcels of land are more viable alternatives than parcel #153240030-6 for replacing LWCF land.

II. The LWCF Program Specifically Authorizes Undergrounding Options that the District Must Explore and Analyze.

The LWCF State Assistance Program Manual specifically supports and facilitates the undergrounding of utilities in LWCF lands. Specifically, "[t]he State may allow underground utility easements within a Section 6(f)(3) area as long as the easement site is restored to its pre-existing condition to ensure the continuation of public outdoor recreational use of the easement area." (LWCF State Assistance Program Manual 8-12; see also DEIR 3-309, 3-310; FEIR 3-322 [Volume II].) Significantly, LWCF financial assistance is available for the specific purpose of undergrounding transmission lines: "

> "LWCF financial assistance may be available for most types of facilities needed for the use and enjoyment of outdoor recreation areas. . . . The beautification of an outdoor recreation area is eligible provided it is not part of a regular maintenance program and the site's condition is not due to inadequate maintenance. This includes: landscaping to provide a more attractive environment; the clearing or restoration of areas that have been damaged by natural disasters; **the screening, removal, relocation or burial of overhead power lines**; and the dredging and restoration of publicly owned recreation lakes or boat basins and measures necessary to mitigate negative environmental impacts."

(LWCF State Assistance Program Manual 3-7 through 3-14 [emphasis added].) Because the LWCF program specifically authorizes and sets aside financial assistance for undergrounding utility lines, the District must fully and independently analyze undergrounding, including its impacts and alternatives, in the HVWA.

III. The District Has Not Demonstrated That It Has Satisfied the Requirements of the LWCF Act for Approval of the Project.

Under the LWCF Act, the Project must comply with the requirements of 36 CFR § 59.3, which specifies several "Prerequisites for Conversion Approval." Based on the current record, however, the District has not demonstrated and cannot begin to demonstrate such compliance without first undertaking further, independent review of the Project.

The LWCF Act states that the NPS will consider conversion requests only if the following nine prerequisites have been met:

> "(1) All practical alternatives to the proposed conversion have been evaluated.
>
> (2) The fair market value of the property to be converted has been established and the property proposed for substitution is of at least equal fair market value as established by an approved appraisal . . .
>
> (3) The property proposed for replacement is of reasonably equivalent usefulness and location as that being converted. . . .
>
> (4) The property proposed for substitution meets the eligibility requirements for L&WCF assisted acquisition. The replacement property must constitute or be part of a viable recreation area. . . .
>
> (5) In the case of assisted sites which are partially rather than wholly converted, the impact of the converted portion on the remainder shall be considered. If

such a conversion is approved, the unconverted area must remain recreationally viable or be replaced as well.

(6) All necessary coordination with other Federal agencies has been satisfactorily accomplished including, for example, compliance with section 4(f) of the Department of Transportation Act of 1966.

(7) The guidelines for environmental evaluation have been satisfactorily completed and considered by NPS during its review of the proposed 6(f)(3) action. . . .

(8) State intergovernmental clearinghouse review procedures have been adhered to if the proposed conversion and substitution constitute significant changes to the original Land and Water Conservation Fund project.

(9) The proposed conversion and substitution are in accord with the Statewide Comprehensive Outdoor Recreation Plan (SCORP) and/or equivalent recreation plans."

(36 C.F.R. § 59.3(b)(1)-(9).)

Here, the District has not demonstrated compliance with the foregoing requirements of the LWCF Act. Contrary to the requirements of subsection (b)(1) and as also demonstrated above, the District has not evaluated all practical alternatives. The District has not analyzed the impacts, viability, and alternatives for undergrounding all or a portion of the RTRP that will run through the HVWA in light of the new information confirming the viability and environmental superiority of undergrounding. Likewise, the District has not analyzed alternatives to replacing existing LWCF lands, such as a change in the RTRP's route that would avoid the HVWA altogether or substantially reduce the RTRP's intrusion into the HVWA. Finally, the District has not evaluated alternatives to replacing LWCF land with parcel #153240030-6 as opposed to using any other parcels to replace the LWCF land. Accordingly, the District has not demonstrated that the proposed land conversion is equitable and the most preferred route in terms of the replacement and lost land's value, use, aesthetics, location, and other characteristics.

Second, contrary to the requirements of subsection (b)(2), the District has not evaluated the fair market value of the LWCF land it proposes to convert and has not evaluated the fair market value of parcel #153240030-6. The District has not set forth any appraisals or studies regarding the fair market value of these lands. Accordingly, the District cannot demonstrate the conversion satisfies the fair market value requirements of the LWCF Act.

Third, the District has not demonstrated that the proposed replacement property is of reasonably equivalent usefulness and location as the LWCF land that is being converted. The

District has not demonstrated that parcel #153240030-6 has a reasonably equivalent usefulness and location as the proposed LWCF land to be converted. Indeed, such an equivalence demonstration may be difficult, if not impossible, because the LWCF land that the District proposes to convert spans seven portions of the HVWA, and the loss of this large tract of the HVWA, its usefulness, and its particular location cannot be adequately offset by the land in parcel #153240030-6 or any other land. Indeed, the City doubts that the loss of open space and recreation land in the HVWA can be adequately offset by the replacement land. The HVWA provides trails and scenic vistas as part of its primary recreational function: "[the] Hidden Valley Wildlife Area...has access to 25 miles of hiking and equestrian trails. Visitors can get away from the noise and lights of the city and enjoy the beautiful views of the river or the bluff overlooking the Santa Ana River bottom." Replacing a massive tract of the HVWA's recreational functions with a parcel that is located in a small portion of the southwestern portion of the overall Hidden Valley Wildlife Area does not replace the value of land lost for the use of trails offering views of scenic vistas (primarily the Santa Ana River that is a linear scenic feature). The District has failed to make any showing that the proposed Project meets the equivalent usefulness and location criteria, and in fact, the District cannot.

Fourth, there is no indication that the District has met the eligibility requirements for converting parcel #153240030-6. Because the District proposes to acquire parcel #153240030-6 -- land that is currently in public ownership -- from the City of Riverside and Riverside County, the District must demonstrate that: (1) the land was not acquired by the sponsor or selling agency for recreation; (2) the land has not been dedicated or managed for recreational purposes while in public ownership; (3) no federal assistance was provided in the original acquisition; and (4) required payments for the land have been made. The District has not made any of the foregoing findings and cannot proceed with the Project absent such a showing.

Fifth, the LWCF Act requires that the District consider the impact of the converted portion of LWCF land on the remaining areas of the HVWA; the District has not made and cannot make such findings because the impacts from placing massive overhead transmission lines and facilities will be significant and irreparable to the entire HVWA. The RTRP and the Project seek to place massive overhead utility lines and structures -- up to 170-feet in height -- throughout areas in the HVWA that have been specifically designated for open space and recreation use. These massive structures will not only prevent the specific areas they are located in from being used for open space or recreation but also will negatively impact the open space and recreational uses of the entire HVWA as these facilities will be incredibly obtrusive and visually jarring from throughout the HVWA. The District must fully evaluate the Project's and the RTRP's impacts on the rest of the HVWA and do so by using visual impact analyses, visual simulations of the proposed height and location of transmission facilities in the HVWA, and visual simulations of the viewpoints from the rest of the HVWA according to how they would be altered by the proposed Project and RTRP.

Finally, the District has not demonstrated that the Project satisfies all necessary coordination requirements with other federal agencies, such as compliance with section 4(f) of the Department of Transportation Act of 1966; that the guidelines for environmental evaluation have been satisfactorily completed and considered; that state intergovernmental clearinghouse review procedures have been adhered to; and that the proposed conversion and substitution are in accord with the Statewide Comprehensive Outdoor Recreation Plan and/or equivalent recreation plans.

IV. The Proposed Project Is Inconsistent with State and Federal Land Use Policies.

The Project does not comply with state and federal land use policies because it eliminates designated open space and recreational land uses, while imposing severe and widespread aesthetic impacts that impair the public's scenic and recreational resources.

California's Recreation Policy 4, (2005) requires that recreation areas be planned and managed to avoid damage to natural resources while providing recreational opportunities: "Recreation areas should be planned and carefully managed to provide optimum recreation opportunities without damaging significant natural or cultural resources. Management actions should strive to correct problems that have the potential to damage sensitive areas and degrade resources." Likewise, the LWCF program requires that LWCF lands serve a variety of pubic outdoor recreation activities, including walking and sightseeing: "Areas acquired may serve a wide variety of public outdoor recreation activities including but not limited to: walking and driving for pleasure, sightseeing, swimming and other water sports, fishing, picnicking, nature study, boating, hunting and shooting, camping, horseback riding, bicycling, snowmobiling, skiing, and other outdoor sports and activities." (LWCF Manual 3-4).

In contravention of these policies, the District's support of the RTRP and the proposed Project creates significant, negative visual impacts from the placement of massive, above-ground power transmission lines throughout the HVWA, irreparably damaging scenic resources and preventing significant portions of the HVWA from being used for their intended and designated recreational and open space purposes. This is contrary to the HVWA's stated mission of protecting such resources. Indeed, even the Draft EIR and Final EIR note that the placement of massive transmission lines in the HVWA conflicts with the LWCF program:

> "The Proposed Project (230 kV transmission line) traverses lands . . . which have received federal funding through the LWCF program. These lands include the Hidden Valley Wildlife Area . . . . Placement of 230 kV transmission line components on these lands would constitute a conflict with the LWCF, according to the California State Parks, Office of Grants and Local Services, which is the Agency that oversees the LWCF program in California."

(DEIR 3-304, 3-305; FEIR 3-317 [Volume II].)

V. The District Must Comply With the Scoping Requirements for the Project's Environmental Screening Form ("ESF").

Contrary to the requirements of the LWCF program, the District has not engaged the City and the rest of the affected public to scope the proposal for the Project. The LWCF State Assistance Program Manual requires that the District invite public agencies, like the City, to provide input early in the planning and scoping process to "yield information for use in defining the scope of the LWCF proposal and possible associated environmental impacts." (LWCF Manual 4-4 and 4-5). Indeed, the ESF "is designed for use as a tool during project scoping, planning, and proposal development to document environmental information and consider the LWCF proposal's possible environmental impacts." (LWCF Manual 4-5). Under step 6 of the ESF, a site inspection of the affected area must be conducted by individuals who are familiar with the type of affected resources, possess the ability to identify potential resource impacts, and to know when to seek additional data when needed. In contrast with these public and local government participation requirements, the District's Request for Public Comment fails to meet the requirements for meaningfully engaging the City and other stakeholders in the preparation of the Project proposal and the ESF. The City strongly urges that the District meet and confer with the City and interested stakeholders before preparing the ESF, especially in light of the District's premature development of the Project proposal without any public input.

VI. The District Cannot Abdicate the District's Independent Review and Decision-Making Obligations to the RTRP Applicant.

The District cannot abdicate its independent review and decision-making functions to the RTRP applicant -- POWER Engineers, Southern California Edison's and Riverside's consultant on the RTRP. Instead, the District must conduct an independent environmental review and objectively evaluate the Project and the RTRP. Delegating these functions to POWER Engineers, as the District has done in the Request for Public Comment, is a complete conflict of interest and violates well-established standards for environmental review.

Significantly, the Court of Appeal has noted that the interests of a lead agency conducting environmental review of a project are at odds with and divergent from the interests of the project applicant, here the RTRP: "**when environmental review is in progress, the interests of the lead agency and a project applicant are fundamentally divergent.** While the applicant seeks the agency's approval on the most favorable, least burdensome terms possible, the agency is dutybound to analyze the project's environmental impacts objectively." (*Citizens for Ceres v. Superior Court* (2013) 217 Cal.App.4th 889, 898 [emphasis added].) Indeed, "[t]he lead agency must independently participate, review, analyze and discuss the alternatives in good faith." (*Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1352.)

Here, the District incorrectly relies upon POWER Engineers to receive and evaluate the public comments in response to the District's March 23, 2018 Request for Public Comment.

Such an abdication of the District's independent environmental review obligations is anathema to the objective and fair environmental review and decision-making that the law requires of the District, especially as the RTRP applicant has divergent interests that are at odds with the District's environmental protection and open space preservation goals. The City requests that the District independently conduct its environmental review and analysis of the Project and that the District require that all public comments and correspondence for the Project be directed to the District rather than POWER Engineers.

VII. Conclusion

The District's mandate is to preserve open space and recreational lands within the HVWA. As demonstrated above, placing massive, overhead transmission lines in the HVWA is in direct conflict with the District's goals. While the District evaluates the Project, the City urges the District to comply with its legal duties of conducting a full and fair environmental review of the Project; finally, for the reasons stated above, the City strongly recommends that the District reject the current proposal for overhead transmission lines in the HVWA.

Very truly yours,

Stephen D. Lee

cc: Gregory P. Priamos, Esq.
Riverside County Counsel
3960 Orange Street, Suite 500
Riverside, California 92501

George Johnson, Riverside County CEO
4080 Lemon Street, 5th Floor
Riverside, California 92501

Supervisor Kevin Jeffries
4080 Lemon Street, 5th Floor
Riverside, California 92501

Supervisor John Tavaglione
4080 Lemon Street, 5th Floor
Riverside, California 92501

Supervisor Chuck Washington
4080 Lemon Street, 5th Floor
Riverside, California 92501

Supervisor V. Manuel Perez
4080 Lemon Street, 5th Floor
Riverside, California 92501

Supervisor Marion Ashley
4080 Main Street, 5th Floor
Riverside, California 92501

Center for Biological Diversity
660 S. Figueroa St., Suite 1000
Los Angeles, California 90017

Endangered Habitats League
c/o Dan Silver, Executive Director
8424 Santa Monica Blvd., Suite A 592
Los Angeles, California 90069-4267

Sierra Club, San Gorgonio Chapter
PO Box 5425
Riverside, California 92517

Center for Community Action and Environmental Justice
7701 Mission Boulevard
Jurupa Valley, California 92509

Interested Parties registered In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
for a Certificate of Public Convenience and Necessity for the
RTRP Transmission Project, CPUC Case No. A.15-04-013

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3.2.15 Response to Letter A15: Lee, Stephen – City of Jurupa Valley

A15-1 The eight KOPs used in the Draft Subsequent EIR were chosen to represent views to the Revised Project and alternatives that were selected from a list of 36 potential observation points. Selection criteria included the sensitivity of viewers, nature of locations (gateways, public parks, etc.), and openness of view to Revised Project facilities. Representatives from the City of Jurupa Valley were provided a list of KOP locations to be evaluated and were involved in selection of KOP locations chosen for developing simulations. Production of additional KOP simulations would not change the Revised Project-related visual impact conclusions detailed in Section 4.1: Aesthetics.

The commenter requested more perpendicular vantage points of the overhead features of the Proposed Project. The purpose of the Subsequent EIR is to analyze components of the Revised Project (refer to MR-3 for a description of Revised Project components). There are no suitable KOPs to provide a perpendicular view of the overhead transmission line on Wineville Avenue due to the presence of homes that line Wineville Avenue and block views from a distance that would be great enough to provide a perpendicular view of more than one transmission structure. The Revised Project near Limonite Avenue includes three overhead structures: two riser poles and one lattice steel tower. The focus of the Revised Project KOPs is on these transmission structures. KOP 6 provides a somewhat perpendicular view, similar to what the commenter requests. The CPUC visual specialist reviewed photograph locations that provide a true perpendicular angle; however, a perpendicular view would not include as many overhead transmission structures, due to the industry standard focal length (55 millimeter [mm]) used for the photographs. KOP 6 was photographed from this angle to accommodate the City's request to show the Revised Project components, including how these components connect to the transmission line analyzed in the certified 2013 RTRP EIR.

A15-2 The purpose of photo simulations is to present a realistic image of pre- and post-project conditions. The industry standard is to use imagery that simulates what the human eye sees, which is an approximately 50 mm focal length, in order to have no apparent wide angle or telephoto distortion. All baseline photographs used to present simulations in the Draft Subsequent EIR were taken using a 50mm lens, including KOP 7. The relative scale of facilities in the KOP 7 simulation to existing features is accurately portrayed.

The simulation for KOP 7 was provided by SCE. Using industry standards, panoramic views are acceptable if they show the larger context: in this case the general open space character of the golf course environment. The simulation for KOP 7 would need to be held at a closer distance from the reader's eye to provide a more accurate representation of what would be seen by someone with a naked eye. Therefore, the panoramic views do not understate the Project's features.

The disclaimer quoted by the commenter was incorrect and was based on previous imagery provided by SCE that used a wider-angle focal length setting that was not used in the Draft Subsequent EIR. The note in Section 4.1: Aesthetics has been changed to read:

> Note: KOP 7 baseline photograph and simulation were provided by Southern California Edison and represent baseline and project conditions in panoramic views. The KOP presents a panorama to allow a more comprehensive visual depiction of the proposed 230-kV transmission line. Because it is a panorama, readers must hold the page closer to their eyes to observe the effect that would be perceived in the field, similar to the other KOP simulations provided in the Subsequent EIR. ~~Panoramic simulations allow the viewer to see more of the proposed 230-kV transmission line; however, project facilities appear smaller in a panoramic simulation due to the nature of baseline photography.~~

Inclusion of the panorama as one of the KOPs, instead of a standard photograph, does not change the analysis. The user sensitivity for golfers is identified as high and the viewing distance is noted as foreground. The significant and unavoidable impact from the visual impact of the Revised Project as seen from the golf course would not change.

A15-3 Comment noted. The analysis in the Subsequent EIR concluded that the impact on visual quality from installation of the riser poles and overhead 230-kV transmission line would be significant and unavoidable, as viewed from several locations. The impacts were considered unavoidable because mitigation could not reduce or avoid the significant effect; the CPUC therefore developed alternatives to the Revised Project that would reduce or avoid the significant aesthetic effects. Alternative 3 was developed to reduce the impact of the large riser poles, which are necessary to accommodate the proposed underground lines. Alternatives 1 and 2 were developed to reduce the effect of the overhead lines by constructing them underground.

A15-4 See response A14-4. The simulations were created using industry-standard methodology. Table F-5 Key KOP Photographic Information was added to Appendix F to provide further technical information about the simulations.

The characteristic landscape of the overall City of Jurupa Valley setting of the project area, with the exception of the Santa Ana River corridor, is generally level with a mountain backdrop. Representative photographs of the various landscape character units are provided in Table 2.1-3 and illustrate this condition. However,

the text in Section 4.1.4: Regional Setting has been amended to include the following:

> The overall topography of the project area in Jurupa Valley is generally level with a panoramic mountain backdrop. The project area slopes over a 3-mile distance toward the Santa Ana River corridor. Elevations range from 738 feet at Cantu-Galleano Ranch Road (KOP 1) to 610 feet at the Goose Creek Golf Course (KOP 7).

A map scale that can be used to identify the distance between each KOP and project feature is provided on Figure 4.1-3.

All KOP base photos were taken at the eye level of the photographer; an elevation of approximately 5 feet 9 inches above the ground surface. This does not represent a flaw in the analysis according to industry standards, nor present a false sense of perspective. Only KOP 8 presents a superior landscape perspective looking down at project features. This perspective is used because the baseline photograph was taken from a publicly accessible trail that traverses a knoll overlooking the Santa Ana River. This superior position is clearly evident in the photograph and is representative of a view that would be seen by the public.

The heights of the facilities in each simulation were identified and accurately simulated. Details of each structure height have been added to Appendix F, in Table F-5. The Subsequent EIR presents images from KOPs taken with a 50mm lens that accurately present spatial conditions under baseline conditions and with the Revised Project, or an alternative, that a person would see.

A15-5 Appendix F provides the full visual quality analysis of views from both the Goose Creek Golf Course (KOP 7) and the equestrian trail in the City of Norco (KOP 8). The analysis notes the changes to the vividness, intactness, and unity of the existing visual quality, and the viewer response based on viewer distance and sensitivity level. As noted in response A15-1, additional KOPs from similar vantage points would not change the impact conclusions because the two KOPs are representative of these areas.

A15-6 The photo simulations provide accurate representations of the height, bulk, relative scale, and colors associated with project features. The structure heights were based on information provided by SCE for each component, not the general heights presented in Chapter 2: Project Description. The commenter's concerns regarding Figures 2.2-2 through 2.2-4 are noted. The figures provide graphic illustrations (not simulations) that are clearly labeled "not to scale." These figures are provided to help the reader understand what is generally meant by the terms lattice steel towers, tubular steel towers, and typical transmission line riser pole.

A15-7 For consistency with the CEQA Guidelines, the issue is not that the CPUC has exclusive jurisdiction, but that the City, or other local agency, has no jurisdiction over the Revised Project. The CEQA Guidelines do not currently require the analysis of consistency with local land use plans, general plans or other county or city planning instruments that do not apply to the Proposed Project. CEQA Appendix G(X)(b) requires the analysis of plans for agencies with jurisdiction over the project. Section X: Land Use and Planning of the CEQA Guidelines Appendix G(X)(b), asks: "Would the project conflict with any *applicable* [emphasis added] land use plan of an agency *with jurisdiction over the project* [emphasis added]?" As stated in the comment, the City of Jurupa Valley has no discretionary jurisdiction over the Revised Project. The applicability of City plans in relation to the Revised Project is moot when conducting an analysis and determining the impact. However, to ensure that the CPUC understands the implications of the Revised Project and to ensure that local community values are clearly understood by the CPUC, a consistency analysis for the Revised Project with the City of Jurupa Valley General Plan is provided in Section 4.9: Land Use and Planning and Appendix J. Inconsistencies with plans are noted. The CPUC did consider alternatives that would avoid or reduce significant aesthetic impacts of the project and will consider those alternatives when making a decision on whether to approve or deny the Proposed Project, including the Revised Project. Mitigation measures are identified throughout the Subsequent EIR that would reduce inconsistency with the plans. As an example, alternatives were developed to reduce impacts on aesthetic and agricultural resources.

A15-8 The impact analysis conclusion that Distribution Line Relocations #7 and #8 would not conflict with the LWCF Act is accurate. Table 2.2-2 in Chapter 2: Project Description describes the elements of these two distribution line relocations. In contrast to the new 230-kV transmission line analyzed in the certified 2013 RTRP EIR, the distribution lines are lower voltage lines that currently exist within the Hidden Valley Wildlife Preserve. The Revised Project involves removing segments of the existing overhead distribution lines and constructing them underground in the same location. Steel riser poles (60 feet tall) would be installed in the same location as existing overhead distribution poles on either end of the new underground segment (refer to Figure 2.2-7 of the Subsequent EIR). The riser poles would replace existing poles and would not convert additional land. The LWCF State Assistance Program Manual states that underground utilities would not constitute a conversion of land, provided the construction impacts are restored within 12 months of construction (NPS, 2008). Mitigation Measure REC-04 requires SCE to restore Revised Project impacts within 12 months of construction. There would be no land use consistency impact from Distribution Line Relocations #7 and #8. No changes to the Subsequent EIR are required.

The commenter incorrectly asserts that Distribution Line Relocations #7 and #8 would include construction of 170-foot-tall transmission towers within the Hidden Valley Wildlife Preserve. As previously stated, Distribution Line Relocations #7 and #8 involve the removal of overhead wood pole distribution structures and installation of 60-foot tall riser poles in the same locations as the removed poles. The distribution lines in question are existing distribution lines within the Hidden Valley Wildlife Preserve and the Revised Project would reduce the number of overhead structures within the LWCF area. Refer to Section 2.4.4 of the Subsequent EIR for a description of proposed activities associated with the Distribution Line Relocations #7 and #8. Figure 2.2-7 identifies the poles that would be removed as part of the Revised Project.

The commenter refers to Exhibit A of their comment letter, which includes a letter sent by the City of Jurupa Valley to the Riverside County Regional Park and Open-Space District regarding the RTRP and Proposed Project facilities that would be constructed on land funded by the LWCF Act. The proposed overhead transmission line through the Hidden Valley Wildlife Preserve was analyzed in the certified 2013 RTRP EIR. The 2013 analysis determined that the overhead transmission line would be a conflicting land use because it would convert land funded by the LWCF Act to non-recreational land. The land conversion is required under Section 6(f)(3) of the LWCF Act and 36 CFR 59.2. The certified 2013 RTRP EIR also identified Mitigation Measure REC-02, which requires SCE and RPU to coordinate with NPS and California Department of Parks and Recreation (CDPR) to replace the land that would be converted as a result of the RTRP. Consistent with the MM REC-02 of the certified 2013 RTRP EIR, SCE and RPU have coordinated with the required agencies to replace the land converted by the RTRP transmission line. The Subsequent EIR does not reanalyze consistency of installation of Proposed Project components, other than Distribution Relocations #7 and #8 on these lands, because the consistency was adequately analyzed in the certified 2013 RTRP EIR. Refer to MR-2 for more information about the adequacy of the analysis in the certified 2013 RTRP EIR.

The CPUC is aware of the ongoing NEPA review being undertaken by the CDPR and National Park Service. SCE has submitted communication records indicating the land conversion process was first contemplated in 2007. The CPUC consulted with CDPR regarding the status of the land conversion in March 2016 and August 2018. The CDPR indicated (Rendon, 2018) SCE had identified suitable land to replace the land that would be converted through construction of the RTRP. CDPR has reviewed a draft Proposal Description – Environmental Screening Form (PD-ESF). The PD-ESF is a preliminary environmental checklist that will help inform the NEPA review. The Riverside County Parks and Open Space District has submitted two versions of the draft PD-ESF to the California Department of Park and Recreation - Office of Grants and Locals Services

(OGALS) in December 2017 and June 2018, which has subsequently been reviewed and approved for submission to the CDFW. The PD-ESF is currently undergoing final review by CDFW. Following CDFW approval, the Riverside County Parks and Open Space District will provide the Riverside County Attorney, the Riverside Park District Advisory Commission, and the Riverside County Board of Supervisors an opportunity to comment on the PD-ESF. The Riverside County Parks and Open Space District will submit the finalized PD-ESF with all comments incorporated and supporting materials to CDPR, who will submit the paperwork to NPS for review. NPS will then review the draft PD-ESF for deficiencies and make a determination on the level of NEPA analysis required for making a decision on the proposed Section 6(f) conversion and replacement lands. Most land conversions are processed as a Categorical Exclusion under NEPA; however, in this case it is assumed that an Environmental Assessment is required. The NEPA analysis document will be completed and attached to the final PD-ESF. Appropriate public review will be conducted by NPS, who will then issue their decision (anticipated to be a Finding of No Significant Impact [FONSI]). SCE currently anticipates the PD-ESF to be submitted to OGALS and NPS in or around November/December 2018. It is estimated that the NEPA analysis, review by the NPS, and public review will take approximately 9 to 12 months from the time of submittal of the final PD-ESF and EA to the NPS (Refer Data Request 13, August 20, 2018).

The CPUC has no discretion over the actions of a federal agency. It is within the CPUC's authority to determine whether the CPCN should be issued prior to the completion of the NEPA review. If the land conversion is not approved by NPS, the project applicant would be required to modify the project to avoid impacts to LWCF land and the CPUC would consider the impacts of the project modifications in a subsequent environmental review. The commenter's opinion that the environmental analysis conducted in the certified 2013 RTRP EIR and Subsequent EIR is premature is noted and will be considered by the CPUC during the decision-making process.

A15-9 The 2013 RTRP EIR was certified, subsequently litigated, and upheld by the courts. As such, the content of the certified 2013 RTRP EIR is considered settled and adequate in accordance with the CEQA Guidelines. The purpose of the Subsequent EIR, as detailed in MR-3, is to address those elements of the Proposed Project that require evaluation due to change in design, baseline conditions, or regulations. The modified elements are referred to as the Revised Project. Consequently, the inadequacy, or otherwise, of the simulations from the certified 2013 RTRP EIR referenced by the commenter are outside the scope of the Subsequent EIR.

A15-10 Refer to response A15-8.

A15-11 Each resource topic in Appendix G of the CEQA Guidelines has a list of questions which guide the scope of the impact analysis. The recreational analysis in the Subsequent EIR focused on Revised Project impacts that would cause substantial physical deterioration of recreational facilities, as the other resource question regarding effects from construction of new recreational facilities was scoped out because it was not applicable to the type of project (refer to the Initial Study Checklist in Appendix B). The impacts on views from recreational facilities were analyzed in Section 4.1: Aesthetics of the Subsequent EIR. The impact on the visual quality from views within the Goose Creek Golf Course, Vernola Park, and recreational paths near the Revised Project components was determined to be significant and unavoidable.

Revised Project construction impacts on recreation facilities, analyzed in Section 4.12: Recreation of the Subsequent EIR, would be temporary. Impacts would be mitigated to less than significant, with implementation of measures requiring trail detours and restoration.

Impacts on the recreational value of existing recreational facilities was adequately analyzed in the certified 2013 RTRP EIR. The Revised Project would not result in a new or greater impact on recreational value. No further analysis is required in the Subsequent EIR.

A15-12 Alternative 8 would involve construction of an underground transmission line from the Mira Loma – Vista #1 230-kV Transmission Line in Jurupa Valley to the proposed Wildlife Substation in the City of Riverside. Alternative 8 was rejected because it would have more significant environmental impacts than the Revised Project. Within Jurupa Valley, the Revised Project includes the segment of overhead 230-kV transmission line on Wineville Avenue and the underground 230-kV transmission line (and the associated riser poles), generally between Limonite Avenue and the Goose Creek Golf Club. The Revised Project does not include any segment of the 230-kV transmission line south of the Santa Ana River. Any impact that would occur from construction of Alternative 8 south of the Santa Ana River would be greater than the impact from the approximately 0.4-mile overhead transmission line and the approximately 2-mile segment of underground transmission line. The environmental impacts associated with Alternative 8 are compared to the Revised Project in Appendix D of the Subsequent EIR. Resource topics with greater impacts under Alternative 8 include:

- Air Quality
- Biological Resources
- Cultural
- Geology
- Greenhouse Gases

- Hydrology
- Hazards and Hazardous Materials
- Paleontological Resources
- Recreation
- Traffic and Transportation
- Tribal Cultural

Impacts related to Aesthetics, Agriculture, Noise, and Traffic are discussed in more detail in responses A15-13 through A15-16 below.

A15-13 The commenter is correct in that long-term aesthetics impacts of Alternative 8 would be reduced in comparison to the Revised Project. Alternative 8 would avoid visual impacts from the overhead transmission line along Wineville Avenue and from the riser poles at Limonite Avenue, but would not eliminate overhead transmission structures. Riser poles would be moved to industrial areas near Cantu-Galleano Ranch Road and near the Wildlife Substation in Riverside. No other transmission infrastructure would be visible along the transmission line route.

A15-14 The commenter is correct that the short-term construction impacts and long-term impacts on important farmland from implementation of Alternative 8 would be less than the Revised Project due to elimination of the riser pole and associated work area, which would be in an area designated as Prime Farmland. Impacts to important farmland are compared in Table A-1, below. As discussed in A15-12, impacts on 11 other resources would be greater. As such, Alternative 8 was correctly screened from further analysis.

Table A-1 Comparison of Impacts on Important Farmland

Alternative	Temporary Impact	Permanent Impact
Alternative 8	12.1	0.0
Revised Project (underground 230-kV transmission line)	12.4	0.4
Alternative 1 (Environmentally Superior Alternative) [a]	0.0	0.0

[a] Preliminary engineering is not available. Estimated using similar work areas and permanent disturbance assumptions as the Revised Project.

A15-15 Noise from construction of Alternative 8 would affect more receptors than the Revised Project. Within Jurupa Valley, Alternative 8 would impact residents along 0.4 mile of Wineville Avenue, in addition to the residents along 1.6 miles of Pats Ranch Road and 68th Street, that would experience a significant noise impact from the Revised Project. Underground construction on the south side of

the Santa Ana River would impact residents in the City of Riverside on approximately 0.6 mile along Auld Street, Bradford Street, and Julian Drive.

A15-16 Traffic impacts associated with Alternative 8 would be greater than the Revised Project because of additional road closures at the location of underground construction. New impacts from construction-related traffic would occur on residential streets in the City of Riverside and within the Hidden Valley Wildlife Preserve for 20 months if the transmission line is constructed underground. Full or partial road closures would be required for underground construction crossing Van Buren Boulevard. No adequate detours to reduce impacts from a full closure of Van Buren Boulevard are available.

A15-17 Comment noted. The commenter is correct that Alternative 8 meets the project objectives, as stated in the Subsequent EIR. In accordance with CEQA Guidelines Section 15126.6 (a), an alternative must not only meet project objectives, but also avoid or substantially lessen significant effects of the project. As noted in responses A15-14 through A15-16, several impacts on resources would be greater than the Revised Project and the alternative was rejected because it would not substantially reduce impacts of the Revised Project.

A15-18 Commenter suggests that an underground alternative is the Environmentally Superior Alternative to the Proposed Project. This assertion was not supported by the certified 2013 RTRP EIR, and the Subsequent EIR analyzes and compares alternatives in relation to the Revised Project elements. Alternative 1 is considered the Environmentally Superior Alternative relative to the Revised Project because it would result in fewer impacts than the Revised Project and all other alternatives considered. The full underground alternative to the entire proposed transmission line, such as Alternative 8, would not have reduced impacts. A full underground alternative was considered and analyzed in Chapter 6: Project Alternatives of the certified 2013 RTRP EIR and was determined to have greater environmental impacts than the overhead transmission line. The Alternatives Screening Report assessment of Alternative 8 for the Subsequent EIR is consistent with the findings of the certified 2013 RTRP EIR. Alternative 8 was rejected in the Subsequent EIR because the alternative would have greater environmental impacts than the Revised Project. The commenter raises the issues of the feasibility and cost of Alternative 8; these issues were not the primary rationale for rejecting the alternative from further consideration.

A15-19 Alternative 8 would reduce long-term aesthetic impacts of the Revised Project from riser poles within the City of Jurupa Valley. The commenters assertions related to long-term Revised Project impacts on recreation and conflicts with land use are incorrect. The construction impacts of Alternative 8, although temporary, would extend the construction period in the Preserve, and would

have a far greater impact than the Revised Project. Revised Project construction within the Preserve is limited to construction of the Distribution Line Relocations #7 and #8 and would not last more than several weeks in each location. Additionally, long-term impacts of Alternative 8 on agriculture and biological resources would be greater due to the additional underground vaults within Prime Farmland north of Limonite Avenue would cause permanent loss of wetlands and wildlife habitat.

A15-20 The subject of the Subsequent EIR is the environmental effects of the Revised Project. The criteria are addressed in the Subsequent EIR. The CPUC will consider consistency with PUC § 1002 in the proceeding. The comment is not relevant within the scope of the Subsequent EIR but will be considered by the CPUC in the decision-making process. Refer to MR-4 regarding the CPUC decision-making process.

A15-21 The commenter expresses concern that the Revised Project is not consistent with community values or the Jurupa Valley General Plan and may have negative effects on the community. Physical environmental impacts of Revised Project implementation were analyzed in the context of CEQA (PRC § 21100). Several topics that address the commenter's concern such as aesthetics, noise, or air pollutants effects on sensitive receptors, biological resources, historical resources, and recreational facilities, were addressed in the Subsequent EIR. Refer to MR-5 for a summary of the visual impacts of transmission lines, which are physical environmental impacts. MR-10 summarizes the results of studies addressing the effects of transmission lines on residential and commercial property values. Mitigation measures and the Environmentally Superior Alternative that would reduce or avoid the effects of concern are identified in the Subsequent EIR.

The commenter offers no further evidence to substantiate the comment regarding the implementation of CEQA within the Subsequent EIR. No response to non-substantive comments is required by CEQA. The opinions offered by the commenter are part of the administrative record and as such will be considered by the CPUC in the decision-making process. As discussed in responses A15-12 through A15-19, Alternative 8 would result in greater environmental impacts than the Revised Project and was therefore rejected from further analysis.

A15-22 The commenter correctly notes that social and economic effects resulting in a physical environmental impact may be used to determine the significance of that impact. The commenter's primary concern is that the RTRP would result in economic impacts on the City of Jurupa Valley due to disruption of future development. The scope of the Subsequent EIR is limited to the impacts of the Revised Project only, not the broader Proposed Project or RTRP refer to MR-3 for details on the scope of the Subsequent EIR). The impacts of the Revised Project are measured and disclosed relative to the baseline, which is defined as the

existing conditions at the time the NOP was issued in accordance with the CEQA Guidelines Section 15125(a), as opposed to a future condition. Use of a future condition as the baseline, while sometimes undertaken in CEQA analysis, requires substantive evidence.

The City of Jurupa Valley and residents expressed concern that the Revised Project (and the proposed 2013 alignment) would have an adverse effect on commercial development. The effect on commercial development would be avoided if Alternative 1 is implemented because it would avoid transmission construction adjacent to the I-15 commercial corridor.

The CEQA Guidelines Section 15002(g) define significant effects on the environment as a substantial adverse change in the physical environment. The Revised Project would not cause environmental impacts on baseline conditions that would have potential economic or social effects.

A15-23 The commenter discusses the outcome of the Economic/Fiscal Impact Analysis that describes adverse economic effects of development of the RTRP (Urban Future Incorporated, 2015). The Economic/Fiscal Impact Analysis analyzed the effects of the RTRP on nine future development projects. Four of these development projects were approved by the City of Jurupa Valley after certification of the 2013 RTRP EIR, which resulted in SCE revising the route of the 230-kV transmission line to avoid these entitled developments. These four development projects are a part of the baseline conditions, upon which the environmental impacts of the Revised Project were determined (refer to MR-3).

At the time the NOP was issued, the land adjacent to I-15 was prime agriculture and no entitlements were approved. The impacts from construction and operation of cumulative projects, including several development projects along I-15, and the Revised Project are addressed in Chapter 5.0: Cumulative Impacts. As noted in response A15-22, any potential environmental impacts that could occur as a result of an economic effect, have been identified in the Subsequent EIR. Although not within the scope of CEQA, concerns regarding effects on property values and commercial development are addressed in MR-10. Community concerns, such as the economic impacts of a project, can be identified and are considered during the CPUC general proceedings, as described further in MR-4. The results of the Economic/Fiscal Impact Analysis are not applicable to the Revised Project as analyzed in the Subsequent EIR because the analysis was conducted on a future baseline and for the entire RTRP, as opposed to just the Revised Project. As stated previously, the effects on commercial development would be avoided if Alternative 1 is implemented.

A15-24 Refer to responses A15-1 through A15-24 for clear reasons why the Subsequent EIR is adequate in regards to the issues raised by the commenter. The

Subsequent EIR was prepared in accordance with CEQA Guidelines Section 15162. No significant new information has been added to the Subsequent EIR since publication of the Draft Subsequent EIR. The Subsequent EIR is adequate and substantiates all impact analyses. The Draft Subsequent EIR is not fatally flawed and recirculation of the Subsequent EIR is not necessary.

Comment Letter A16

Braun Blaising Smith Wynne, P.C.

Attorneys at Law

May 17, 2018

Via E-Mail (riversidetrp@panoramaenv.com)

Jensen Uchida
California Public Utilities Commission
c/o Panorama Environmental, Inc.
717 Market St. Suite 650
San Francisco, CA 94103

Subject: **Opening Comments of the City of Corona On The Draft Supplemental Environmental Impact Report For The Riverside Transmission Reliability Project (Application 15-04-013)**

Dear Mr. Uchida:

The City of Corona hereby submits the following comments on the Draft Supplemental Environmental Impact Report ("Draft SEIR") for Southern California Edison's ("SCE") proposed Riverside Transmission Reliability Project ("RTRP"). The Draft SEIR was released on April 2, 2018 as part of the California Public Utilities Commission's ("Commission" or "CPUC") Environmental Impact Review ("EIR") of the RTRP proposal in Application ("A.") 15-04-013.

As set forth below, Corona is generally supportive of the Draft SEIR, including the Draft SEIR's identification of Alternative 1 as the Environmentally Superior Alternative, and the Draft SEIR's rejection of Alternative 29 and Alternatives 24-26. However, Corona is concerned that the Draft SEIR's rejection of Alternatives 24-26, while valid, is based in part on misstatements of law that should be clarified or corrected, and errs in failing to acknowledge the soundness of the logic underlying these Alternatives.

INTRODUCTION

Corona is a municipality of approximately 160,000 residents located in Riverside County, California. Corona has its own municipal electric utility, the Corona Department of Water and Power, which provides electric service to portions of the city. The remainder of the city receives electric service from SCE. SCE owns and operates a number of transmission facilities located within Corona's city limits, and has an application currently before the Commission – SCE's Circle City Project ("CCP") proposed in A.15-12-007 – that would involve the construction of significant new transmission facilities inside Corona. The proposed RTRP and CCP projects are functionally and geographically linked, and several of the RTRP project alternatives that are addressed in the Draft SEIR would involve significantly expanding the proposed CCP, which would result in significantly greater environmental and social impacts in Corona. In addition, A16-1

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Corona is located in the Northwest Riverside County area – the same region where RTRP would be constructed. As such, Corona believes that it is essential that the Commission ensure that the RTRP project, if approved, is constructed in a manner that respects the region's unique visual character and preserves its aesthetic resources. With these interests in mind, Corona offers the following comments on the Draft SEIR. A16-1

COMMENTS ON THE DRAFT SEIR

1. Corona Supports The Draft SEIR's Selection Of Alternative 1 As The Environmentally Superior Alternative

The Draft SEIR correctly identifies Alternative 1 as the Environmentally Superior Alternative that meets all project objectives. The baseline revised RTRP proposal ("Revised Project") would include the construction of an overhead 230 kV transmission line segment running north-south on Wineville Avenue and along Interstate-15. This overhead line would include three lattice steel towers ranging from 115 to 120 feet in height, one 90 foot tall tubular steel pole, and one 170 foot tall tubular steel pole, all of which would significantly reduce the aesthetic character of, and views from, Interstate-15 as well as neighboring roadways, parks, recreational areas, and residential neighborhoods. Under Alternative 1, the Wineville Avenue / Interstate-15 line segment would be slightly rerouted to a parallel route, primarily running north-south along Pats Ranch Road, and, more importantly, *would be placed entirely underground*. The remainder of Alternative 1 would be identical to the Revised Project.[1] A16-2

The line segment that would be undergrounded under Alternative 1 would be located in Jurupa Valley, California, less than four miles from Corona. Both Jurupa Valley and Corona are located in the Northwest Riverside County area – a region with unique visual resources and aesthetic character. The area includes Lake Matthews, the Santa Ana River Valley, and, most importantly, Santa Ana Mountains, which rise thousands of feet from the valley floor and are the dominant visual feature in much of the area. The Santa Ana Mountains include forested slopes and, in winter, snow-capped peaks that contrast with the grassland vegetation in the valley below. The area is also home to a wide range of scenic roadways, hiking and bicycle trails, parks, historic sites, picturesque agricultural and residential areas, thriving commercial developments, and other recreational areas that derive a significant share of their value from their aesthetic features.

Corona supports the Draft SEIR's recognition that the Revised Project's proposed poles and towers would result in a significant permanent impact on views from local roadways, parks, and recreational areas.[2] The large poles and risers proposed in the Revised Project would have significantly degraded the visual character of part of Interstate-15, one of the area's main economic arteries, and would have significantly degraded the aesthetic character of, and views from, a number of roadways and residential neighborhoods. Preserving its aesthetic character is of fundamental importance to the region, and the Draft SEIR assigns appropriate weight to this important factor. A16-3

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1 Draft SEIR at 6-2, 6-6 – 6-9.

2 Draft SEIR at 6-8 (Table 6.4-2).

Corona also supports the Draft SEIR's emphasis on the *permanent* nature of the negative aesthetic impact of the Revised Project's lines and poles. The Draft SEIR appropriately assigns greater weight to this permanent harm than it does to temporary impacts, such as construction-related traffic and noise impacts.[3] A16-3

2. Corona Strongly Supports The Draft SEIR's Rejection Of Alternative 29

As directed by the ALJ, on January 12, 2018 SCE and the City of Riverside submitted a *Joint RTRP Lower Voltage And Other Design Alternatives Report* ("Report"). The Report analyzed three possible lower-voltage alternatives to the Revised Project and rejected all three alternatives as infeasible.[4] The Draft SEIR considered (and eliminated) all three of the lower voltage alternatives identified in the Report, identifying them as Alternatives 28, 29, and 30.[5]

Of particular interest to Corona is the Alternative identified as Lower Voltage Alternative B in the Report, and Alternative 29 in the Draft SEIR. Alternative 29 would significantly expand the Circle City Substation proposed by SCE in its CCP application – a substation that, if CCP is approved, would be located in Corona. Alternative 28 would also require the construction of a new 230 kV transmission line connecting to the Circle City substation. This line would be *in addition to* the five new 66 kV lines already proposed in the SCE's CCP application.[6]

The Report rejected Alternative 29 on the grounds that it would take significantly longer to construct, would be substantially more expensive, and is likely to increase the environmental and social impacts of the project. Regarding Alternative 29's environmental effects, the Report states: A16-4

> [Alternative 29] is also likely to significantly increase environmental impacts. With respect to environmental factors, [Alternative 29] requires a new 230 kV circuit that is longer than the RTRP Hybrid Proposal, plus six 69 kV circuits along three separate routes to deliver an equivalent amount of energy as the RTRP Hybrid Proposal. This configuration would create new environmental and landowner impacts. The three 69 kV line routes would result in a total of 30.4 line miles, and the 230 kV line would be at least 11 miles, versus the 9.7-mile RTRP Hybrid Proposal. The increased line mileage correspondingly increases the environmental impacts. The RTRP Hybrid Proposal consists of 63 steel structures, while [Alternative 29] is estimated to include 335 steel structures, which would also have a large impact on affected landowners in terms of securing easements and mitigating view shed concerns as well as increase vulnerabilities to damage from, for example, traffic and other environmental conditions. While the RTRP Hybrid Proposal impacts 71 parcels with its overhead double-circuit 230 kV line, Alternative B is estimated to impact 163 parcels with double-circuit 69 kV overhead

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3 Draft SEIR at 6-9.
4 Report at 15-17.
5 Draft SEIR at 3-19 – 3-20.
6 Report at 69; Draft SEIR at 3-20.

lines, a significant increase. Finally, the likely impacts to wildlife are greater under Alternative B.[7]

Regarding Alternative 29's social impacts, the Report states:

> Social factors also support a finding of infeasibility. The large number of structures and line miles described above in connection with environmental factors will create greater impacts on the communities located adjacent to the [Alternative 29] facilities relative to the impact that the shorter route and reduced number of structures associated with the RTRP Hybrid Proposal will have on communities adjacent to the project. Given that the line routes for Alternative B do not follow the same route as the RTRP Hybrid Proposal and would entail a longer 230 kV line, SCE and Riverside anticipate that new community opposition would arise and that new environmental analyses of the routes may be required, with a corresponding delay of the project's timing… [Alternative 29] is likely to have larger environmental justice impacts on disadvantaged communities.[8]

A16-4

The Draft SEIR eliminated Alternative 29 on the grounds that:

> Alternative 29 does not meet technical or regulatory feasibility criteria and would be financially infeasible. The alternative would result in greater impacts than the Revised Project and would not meet the environmental screening criteria due to the installation of a longer 230 kV transmission line and approximately 30 miles of new power lines, which would result in greater environmental impacts than the Revised Project.[9]

Corona strongly supports the Draft SEIR's elimination of Alternative 29. However, Corona believes that the Draft SEIR's discussion of Alternative 29 should be expanded to address all of the negative impacts specifically identified in the Report, including the likely impacts related to securing easements, landowner view concerns, environmental justice impacts on disadvantaged communities, and wildlife impacts. In addition, Corona has a number of concerns regarding the environmental, traffic, noise, and aesthetic impacts of the much smaller Circle City substation and related lines proposed in the CCP proceeding. The expanded Circle City Substation required by Alternative 29 would result in even greater impacts, including significant additional impacts on traffic, construction noise, and aesthetics. The Draft SEIR's discussion of its justifications for rejecting Alternative 29 should explicitly address these impacts.

3. Corona Generally Supports The Draft SEIR's Rejection Of Alternatives 24-26, But The Draft SEIR Should Be Modified To Correct Errors Of Law And Acknowledge The Legitimacy Of ORA's Underlying Logic

A16-5

In its February 24, 2017, *Comments On The Notice Of Preparation Of An Environmental Impact Report and Scoping Meeting Regarding Riverside Transmission Reliability Project*, the Office of

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7 Report at 92-93.
8 Report at 93.
9 Draft SEIR at 3-47.

Ratepayer Advocates ("ORA") argued that four SCE-proposed transmission projects located in the Lake Mathews area – the Valley-Ivyglen Project ("VIG") the Alberhill System Project ("ASP"), CCP, and RTRP, appear to be so closely linked in terms of geography, capacity provided, and purpose served that they should be viewed and assessed as a single project. Regarding RTRP and CCP, ORA argued that:

> Although the RTRP and the CCP serve different communities, the two communities are contiguous and are both served by the 66 kV sub-transmission facilities. Both the RTRP and the CCP would be constructed and operated by SCE, so the two projects can be consolidated.[10]

Regarding all four projects, ORA argued that: "because the projects are all geographically next to each other, the CPUC should consider all four projects together so that the best transmission project alternatives can be considered."[11] ORA further stated that, considered together, "there may not be a need for all four projects."[12] ORA then outlined three "Options," each of which, ORA asserted, would leverage (and in some instances expand) the CCP, ASP, and VIG projects reduce or eliminate the need for RTRP.[13]

A16-5

The Draft SEIR considers the three "Options" proposed by ORA as Alternatives 24-26, eliminating all three alternatives on three grounds: 1) none of the alternatives satisfies the basic project objective of providing a second power connection to Riverside; 2) none of the alternatives meets feasibility criteria, as the Commission is required to respond to the Application presented by the Utilities and does not have a mechanism to require the consolidation of multiple projects that have been recommended by CAISO; and 3) the alternatives would result in substantially greater environmental impacts than the Revised Project, due to the need for much longer transmission lines.[14]

Corona agrees with the Draft SEIR's elimination of Alternatives 24-26 on the first and third grounds. None of the three Alternatives provides a second connection to Riverside, which both SCE and Riverside have identified as an essential project element. Further, all three Alternatives would reduce the size and impacts of the RTRP project by shifting additional construction and impacts to ASP, VIG, and, especially, CCP, resulting in a greater total systemwide impact.

However, the Draft SEIR's rejection of Alternatives 24-26 on feasibility grounds appears to be based on two serious errors of law. First, it is unclear what the Draft SEIR means when it states that Alternatives 24-26 are infeasible because "The CPUC is required to respond to the utilities applications for each project."[15] Although the CPUC is required to review utility applications, it is also true that the CPUC has the authority to consolidate applications and EIR processes, and to

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10 ORA Comments at 7-8.
11 *Id.* at 8.
12 *Id.* at 1.
13 *Id.* at 8-11.
14 Draft SEIR at 3-18 – 3-19.
15 *Id.*

order the consideration of alternative configurations. Such consolidation is a normal and regular occurrence at the CPUC, with the Commission's consolidated review of the ASP and VIG projects providing a clear and procedurally relevant example. Further, even if the Commission has not consolidated the EIR processes for the projects in question, the fact that an Alternative would reduce a proposed project's size (and environmental impacts) by leveraging other existing or proposed projects in the same region is not a valid basis for eliminating an alternative as infeasible. To the contrary, Alternatives that leverage other existing or proposed projects to reduce or eliminate the need for the project under consideration should be one of the Commission's top priorities. Such alternatives can both significantly reduce a project's environmental impacts, and save ratepayer money by identifying more efficient system configurations that reduce unnecessary or duplicative infrastructure.

Second, the Draft SEIR's statement that the Commission "does not have a mechanism to require the consolidation of multiple projects that have been recommended by the CAISO" is both misleading and irrelevant to the question of the alternatives' feasibility. Even if the Commission does not currently have a specific *mechanism* in place for consolidating CAISO-recommended projects, it is clear that the Commission has the *authority* to do so. Corona is unaware of any authority that would prevent the ALJ from issuing a ruling requiring a consolidated EIR process for one or more projects, regardless of whether those projects have or have not been recommended by CAISO.

A16-5

Corona is also concerned that the Draft SEIR's elimination of the particular "Options" proposed by ORA (Alternatives 24-26), while justified on some grounds, ignores the sound logic underlying ORA's position. The Draft SEIR should acknowledge that, given the geographic and functional proximity and overlapping purposes served by RTRP, CCP, ASP, and VIG, any Environmentally Superior Alternative selected in this proceeding should satisfy the RTRP's proposed purposes (including providing a second connection to Riverside) while also minimizing the environmental impacts of the RTRP *and related projects*. In other words, the Draft SEIR should give the RTRP Environmentally Superior Alternative the full credit that it is due – not only for the ways that the Alternative reduces environmental impacts specific to the RTRP proposal, but also for the ways that a full build-out of Alternative 1 can be leveraged to reduce the need for – and environmental impacts of – the CCP and possibly other related projects.

A16-6

/ / /

CONCLUSION

The City of Corona thanks the Commission for its consideration of the matters raised in these comments, and respectfully requests that the corrections and modifications to the Draft SEIR's discussion of Alternatives 24-26 and Alternative 29 discussed above be included in the Commission's Final SEIR. A16-7

Dated: May 17, 2018

Respectfully submitted,

_____/S/_____

David Peffer
Braun Blaising Smith Wynne, P.C.
915 L Street, Suite 1480
Sacramento, CA 95814
(916) 326-5813
peffer@braunlegal.com

Attorney for:
City of Corona

3.2.16 Response to Letter A16: Peffer, David – City of Corona

A16-1 The alternatives screened in the Subsequent EIR (Chapter 3: Alternatives and Appendix D) were developed for the Revised Project, not the RTRP (refer to MR-3 for details regarding the scope of the Subsequent EIR). The commenter's concerns regarding several of the alternatives that would consolidate the Circle City Project are noted. The three applicable alternatives, Alternatives 24 through 26, were screened out from further analysis for not meeting any of the screening criteria; not meeting basic project objectives; lack of feasibility; and would not avoid or reduce environmental effects.

A16-2 The commenter's support for Alternative 1 is noted. A detailed analysis of the impacts on visual character from implementation of the Revised Project and Alternative 1 are detailed in Section 4.1: Aesthetics. As analyzed in Chapter 6: Comparison of Alternatives, Alternative 1 would reduce the impact on visual quality at several locations, compared to the Revised Project, from significant and unavoidable to less than significant with mitigation.

A16-3 The commenter's support for the approach used in the Subsequent EIR that prioritizes the importance of permanent impacts over temporary impacts is noted. The Subsequent EIR identifies that impacts of the Revised Project on visual quality would be significant and unavoidable as viewed from many locations.

A16-4 The commenter's support for the rejection of Alternative 29 is noted. The commenter requests that the discussion regarding the reasons for rejection of Alterative 29 be expanded in the Subsequent EIR. The rationale for rejection including lack of feasibility and greater environmental impacts is summarized in the Subsequent EIR. Discussion of rejected alternatives in Chapter 3: Alternatives is supplemented by Appendix D, which provides the additional information requested by the commenter. The discussion in the Subsequent EIR has not been expanded because this information is available as part of the record in Appendix D.

A16-5 The commenter provides support for the rejection of Alternatives 24 through 26 but questions the legality of certain statements within the Subsequent EIR suggesting that the CPUC does not have the authority to combine multiple projects. That commenter is correct, and the language regarding why Alternatives 24 through 26 were rejected has been revised in Chapter 3: Alternatives and Appendix D, as follows:

> Does not meet feasibility criteria. ~~The CPUC is required to respond to the utilities applications for each project and does not have a mechanism to require substantial modifications of another project.~~ The alternative does not meet regulatory feasibility criteria because it would not be feasible to obtain the necessary approvals from the CPUC and other agencies to

install the needed power lines within the timeframe that the project is required.

A16-6 The impacts of alternatives and associated benefits are discussed in the Subsequent EIR in regards to the scope of the Revised Project. Analysis of the impacts from and identification of alternatives to a speculative project comprised of a combination of the RTRP and Circle City Project would require the CPUC to order the combination of the two projects, which would require a separate CEQA document. The analysis in the Subsequent EIR is therefore appropriately scaled to the Revised Project. The alternatives screening analysis was not expanded to include a discussion of the impacts of the Circle City Project because the Circle City Project is not required to meet RTRP project objectives.

A16-7 The commenter's requests have been responded to in responses to comments A16-1, A16-4 and A16-5.

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