3.5 APPLICANT

This section includes the comments received from the Applicant (SCE), with individual comments delineated and followed by responses to each comment. SCE provided comments in a comment letter (D1) and a supplemental table (Attachment A: Southern California Edison Company's Comment Table on The Draft Subsequent EIR for RTRP [D2]). SCE's comment letter also included an attachment that is not an individual comment on the Draft Subsequent EIR (Attachment B: Excerpts from 2017 Jurupa Valley General Plan Draft EIR [D3]). D3 is included below.

D1 provides detailed comments that focus on permanent and temporary impacts, and alternatives to the Revised Project. D2 provides line-by-line suggested corrections to the Draft Subsequent EIR text, including requests for changes to mitigation measures. Comments include editorial suggestions, technical clarifications, and corrections.

The CPUC has modified the Draft Subsequent EIR in response to SCE's comments, where appropriate. An explanation is provided where changes were not incorporated into the Subsequent EIR.

Comment Letter D1

SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL Company

Robert D. Pontelle
Senior Attorney
Real Property, Local Government
Affairs and Licensing
robert.pontelle@sce.com

May 16, 2018

By E-mail and U.S. Mail

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

Re: Comments on the CPUC's Draft Subsequent EIR (SCH # 2007011113) prepared for the Riverside Transmission Reliability Project

Dear Mr. Uchida:

Thank you for the opportunity to comment on the above-referenced Draft Subsequent Environmental Impact Report ("DSEIR"). On behalf of Southern California Edison ("SCE"), the applicant for the 230 kV portion of the Riverside Transmission Reliability Project ("RTRP") that is the subject of the DSEIR, SCE appreciates the work on the document by the California Public Utilities Commission ("CPUC") and its consultant Panorama Environmental, Inc., and SCE looks forward to the CPUC's consideration of RTRP to enable Riverside Public Utilities ("RPU") to obtain the necessary energy it needs to accommodate the growing demand of its electrical users.

This comment letter, including the table appended hereto as Attachment A, set forth SCE's comments, with a particular focus on some analyses and conclusions in the document that appear skewed against RTRP's overhead components as opposed to providing a neutral comparison of overhead and underground infrastructure. As a result, although SCE already revised its original RTRP concept to develop a hybrid variation (denoted the "Revised Project" in the DSEIR), the DSEIR overlooks any benefits already provided by that hybrid proposal, and concludes that additional undergrounding is necessary despite the additional impacts, expenses and disruptions associated with undergrounding. SCE disagrees with that conclusion for the reasons set forth in the balance of this letter and the comments table.

I. The DSEIR's Analysis Of Revised Project Impacts And Alternatives Overreaches Beyond The Proper Scope Of A Subsequent EIR.

As the Initial Study circulated by the CPUC acknowledges, the purpose of a subsequent EIR is to explore environmental impacts not considered in the original environmental document; the event of a change in a project is *not* an occasion to revisit environmental concerns laid to rest

D1-1

P.O. Box 800 2244 Walnut Grove Ave. Rosemead, California 91770 Phone: (626) 302-6025 Fax: (626) 302-6736

in the original analysis. (California Public Utilities Commission, Riverside Transmission Reliability Project CEQA Initial Study Checklist, at p. 1-7; *Mani Brothers Real Estate Group v. City of Los Angeles* (2007), 153 Cal.App.4th 1385, 1398-99; *Friends of the College of San Mateo Gardens v. San Mateo Community College District* (2016) 1 Cal. 5th 937, 949-950.) However, despite this established guiding principle, the DSEIR appears to analyze impacts from portions of RTRP that have not changed since the original Final EIR was certified by the City of Riverside in 2013, even for the Revised Project.

Whereas a subsequent EIR should analyze the significance of changed environmental impacts between the original RTRP and the Revised Project, the DSEIR appears to undertake an excessive analysis of impacts across all of RTRP. For instance, the Project Description discusses all structure installation activities for the overhead components of the 230 kV line, even the overhead portion that would be adjacent to I-15 between Limonite Avenue and Landon Drive. (*See, e.g.,* DSEIR, at 2-14.) Yet, this portion of the overhead route is unchanged from the RTRP studied in the 2013 Final EIR, notwithstanding the fact that undergrounding and riser pole modifications and route adjustments have been made to *other portions* of the route. Therefore, it is inappropriate for the DSEIR to reprise a discussion of the potential impacts from this portion of RTRP, as they were completely and conclusively analyzed in the 2013 Final EIR certified by the City of Riverside. (*Mani Brothers, supra*, 153 Cal.App.4th at 1398-99; *Friends of the College of San Mateo Gardens, supra,* 1 Cal.5th at 949.)

D1-1

The DSEIR also unreasonably promotes alternatives at locations where the Revised Project would actually reduce impacts compared to the originally proposed RTRP. For example, despite the uncontroverted fact that the Revised Project's two miles of underground lines would actually cause *fewer* aesthetic impacts than the original entirely overhead proposal, the DSEIR evaluates alternatives that go far beyond what is necessary to avoid the remaining impacts associated with the new design. In designing the Revised Project, SCE changed *only* those components necessary to render RTRP more compatible with land uses that commenced development since the 2013 Final EIR. (*See* http://www.cpuc.ca.gov/environment/info/panoramaenv/RTRP/index.html#Background.) Except for one underground portion and ancillary facilities to support that undergrounding, the rest of the route remains the same. Nevertheless, the DSEIR discusses alternatives imposing additional undergrounding needlessly designed to avoid impacts from portions of RTRP that have not even changed (or have changed in a way that already reduces impacts).

D1-2

For example, the DSEIR includes a discussion of Alternative 10, which would require undergrounding of approximately one additional mile of the 230 kV line *south* of the Santa Ana River, *i.e.,* a portion of the transmission line analyzed in the 2013 Final EIR and *not* changed in the Revised Project. (DSEIR, at 3-38.)[1] Similarly, although the Revised Project involves moving above-ground transmission line structures from the east side of Wineville Avenue to the west side of Wineville Avenue north of Landon Drive, *i.e.*, farther away from a planned residential development, the DSEIR considers new Alternative 4, calling for complete

[1] The DSEIR rejects Alternative 10, reasoning that it would create additional environmental impacts in comparison to the Revised Project. But there does not appear to be any justification for the DSEIR to even consider that alternative in the first instance.

undergrounding of all structures along Wineville Avenue north of Landon Drive. (DSEIR, at p. 6-16.) D1-2

In short, the DSEIR essentially affords no credit to the Revised Project despite the fact that the Revised Project would dramatically improve aesthetic and other impacts compared to the original RTRP. To the contrary, the revisions made by SCE appear to have been used as an impetus for the DSEIR to analyze components (and alternatives affecting those components) related to a much broader portion of RTRP than warranted. The Final SEIR should focus its analysis only on those portions of the Revised Project that differ from, and would cause greater impacts than, the original RTRP studied in the 2013 Final EIR certified by the City of Riverside. D1-3

II. The DSEIR Inconsistently Overvalues Permanent Impacts From The Revised Project While Ignoring Factors That Would Offset Those Impacts.

In addition to discussing RTRP features and components that were not changed as part of the Revised Project, the DSEIR is fraught with overstatements regarding Revised Project impacts.

A. The DSEIR's Conclusive Declaration That Permanent Impacts Outweigh Temporary Impacts Is Overbroad And Unevenly Applied.

The DSEIR declares that the reduction and mitigation of permanent impacts is of greater importance than the reduction of temporary impacts when deciding which alterative is environmentally superior. (DSEIR, at p. 6-19.) While that concept appears logical as a general principle, it has no basis in CEQA and its application in the DSEIR inappropriately shifts the balance of the analysis such that undergrounding becomes a predetermined *fait accompli*. D1-4

CEQA requires that an EIR consider each alternative individually against the proposed project. (*See generally*, Tit. 15, Cal. Code Regs. § 15126.6, subd. (a) (EIR should evaluate comparative merits of each alternative against the proposed project).) However, the DSEIR's analysis in Chapter 6 is so predisposed against the aesthetic impacts of two riser poles that any alternative with additional undergrounding is automatically assumed to be superior to the Revised Project. This is despite the facts that: a) Alternatives 1, 2 and 4 (all of which include additional undergrounding) would inflict several weeks of intense air quality, noise and traffic impacts on residences just a few feet from trenching activities; and b) the only Revised Project components that might cause a significant aesthetic impact are located far away from any existing sensitive views. (*See, e.g.*, DSEIR, at pp. 4.3-33, 4.3-39.)[2] In other words, with regard D1-5

[2] To facilitate the undergrounding of approximately two miles of what was originally designed to be overhead lines (thereby creating fewer aesthetic impacts), the Revised Project includes riser poles on agricultural properties just northeast of the northbound I-15 onramp at Limonite Avenue, and within the Goose Creek golf course. (DSEIR, at pp. 2-3, 2-5.) Those locations were selected because, as the DSEIR acknowledges, they are not within any scenic view corridor, I-15 and Limonite are not scenic highways/roadways and the new infrastructure would not obstruct any identified scenic vistas. (*See* DSEIR, at p. 5-14.) In fact, the poles themselves would be located either in golf course vegetation or in an agricultural field north of Limonite Avenue several hundred feet away from any sensitive residential receptors. D1-6

to the DSEIR, the exception has swallowed the rule; an above-ground transmission line seemingly could never be considered environmentally superior simply because it would cause a permanent aesthetic impact, despite the litany of significant temporary impacts associated with additional undergrounding. D1-5

Compounding the problem is the fact that the DSEIR does not apply this "permanent vs. temporary" philosophy evenly. For example, any undergrounding alternative would have the potential to inflict significantly more permanent impacts to cultural resources than an overhead project, simply because of the sheer volume of additional ground disturbance associated with trenching. Yet, that permanent impact is downplayed in the DSEIR, leaving the reader with the impression that only permanent *aesthetic* impacts are given greater importance in the DSEIR's analysis. D1-7

The Final SEIR should consistently and comprehensively balance all of the impacts associated with both the Revised Project and the various alternatives.

B. <u>Impacts To Agricultural Resources Are Assigned To The Revised Project Regardless Of The Fact That They Have Already Been Identified In Other CEQA Analyses.</u>

The DSEIR declares that the Revised Project's overhead transmission line components would be responsible for the conversion of 0.4 acres of Farmland north of Limonite Avenue to non-agricultural utility use. (DSEIR, at pp. 4.2-9 – 4.2-11.) However, that same land is already anticipated to be converted to non-agricultural uses by other projects. As the DSEIR acknowledges, the acreage in question falls squarely:

> ". . . within areas ***that would otherwise be converted*** from agricultural use by the Lesso Mall Development (#13) and Sky Country and Vernola Trust North (#15) if the Revised Project were not implemented."

(DSEIR, at p. 5-17, emphasis added.) D1-8

Indeed, the City of Jurupa Valley has actively supported such development, as the land north of Limonite Avenue is designated in the Jurupa Valley 2017 Draft General Plan for development as a "Business Park" (allowing for "Employee-intensive uses, including research and development, technology centers, corporate offices, clean industry, and supporting retail"), and its zoning would permit commercial uses such as "book stores, catering services, banks, and hardware stores." (DSEIR, at pp. 4.9-3, 4.9-5, 4.9-7, 4.9-5.) The city's recent EIR prepared in support of that General Plan confirms that agricultural conversions in the city would be significant and unavoidable as a result of new land use designations and developments. (*See* City of Jurupa Valley 2017 General Plan –Draft Environmental Impact Report, SCH# 2016021025, at p. 4.2-12.)[1]

[1] Relevant excerpts from the Draft EIR for the 2017 Jurupa Valley General Plan are included in Attachment B to this letter.

Therefore, the DSEIR's assessment that the Revised Project would cause these impacts is essentially "double-counting" given that other projects already are expected to cause the same conversion. The Final SEIR should declare that Revised Project impacts to agriculture would be less than significant. D1-8

III. The DSEIR's Failure To Accurately Identify The Impacts Of Each Alternative Precludes A Legitimate Comparison Of Alternatives Against The Revised Project.

Whereas the DSEIR overstates Revised Project impacts, the DSEIR understates the impacts associated with the alternatives carried forward for detailed analysis, such that the four alternatives described in the DSEIR are all shown in a light more favorable than deserved.

A. The DSEIR Overlooks And Minimizes Impacts Associated With The Four Route Alternatives It Analyzes In Detail.

From a global perspective, the environmental analyses in the DSEIR are presented in a way that minimizes the discussion of impacts stemming from the alternatives, skewing the analysis against the Revised Project. The DSEIR evaluates the impacts from the entirety of the Revised Project (including, as stated above, some portions that have not been revised at all). In contrast, the discussion of alternatives at the end of each impact analysis subsection describes only the impacts stemming from the portion of the alternative that would *differ from* the Revised Project. Other RTRP components are not considered in the impact calculus for the alternatives.[4] This is not an "apples to apples" depiction of the Revised Project and necessarily distorts any comparison between alternatives and the Revised Project. D1-9

Further, the DSEIR's assessment of *specific* impacts from the alternatives is also flawed. For example, the DSEIR downplays the substantial construction-related impacts that would emanate from prolonged trenching and conduit installation activities in public streets and adjacent to Vernola Park. It concludes that recreation impacts from Alternative 2, which includes undergrounding in Wineville Avenue all the way from Limonite Avenue to Cantu Galleano Ranch Road, would be less than significant with mitigation.[5] (DSEIR, at p. 4.12-22.) However, the DSEIR ignores the fact that in order to construct Alternative 2, construction staging and trenching activities would necessitate the *full closure* of the Wineville Avenue entrance to Vernola Park potentially for as long as five weeks. Because there is no street access leading into the Vernola Park facility other than the entrance on Wineville Avenue, this closure would mean that there would be *no* direct vehicular access to the Vernola Park parking lot or community facilities for that entire time. That interference with the use of one of Jurupa D1-10

[4] A mathematical example may help elaborate on this point. If "A" references the portions of RTRP that have not changed since 2013, "B" references the portions changed by SCE to make the Revised Project and "C" references the portions changed by the DSEIR in crafting an alternative, the DSEIR analyzes the impacts from (A + B) for the Revised Project, but only analyzes C alone for the alternative. A true comparative analysis would assess a combined (A + B) for the Revised Project against a combined (A+ parts of B + parts of C) for the alternative.

[5] The mitigation measures identified by the DSEIR as applicable to this impact relate only to maintaining alternative access points and restoring trails impacted by construction, not park facilities. (DSEIR, at pp. 4.12-19, 4.12-22.)

Valley's most primary park facilities should be identified as a significant and unavoidable impact to recreation from Alternative 2. D1-10

Similarly, the DSEIR also fails to disclose the full range of impacts related to traffic and emergency response times stemming from the alternatives, particularly Alternative 4. Among other things, construction of Alternative 4 would require the full closure of Landon Drive, which runs about 1/3 mile west from Wineville Avenue and terminates in a *cul de sac.* (See DSEIR, at p. 2-4.) Because Landon Drive is only a two-lane street, it is likely that underground trenching would necessitate the full closure of Landon Drive if Alternative 4 were to be developed. As a result, access to land uses from Landon Drive would be necessarily impacted, which would pose a significant and existential problem given that it appears that Landon Drive provides the *only* public vehicular access to at least one industrial land use located at the end of the *cul de sac.* D1-11

The DSEIR attempts to assuage these concerns through imposition of Mitigation Measure TRANS-06, which would require SCE to ensure access of at least one lane on each affected street even during construction. (DSEIR, at pp. 4.13-41 4.13-79 – 4.13-80.) But given the need for at least 30 feet of work space for underground trenching, and depending on the locations of other utilities that may be in Landon Drive, there may not be enough space in that street to enable constant vehicular traffic (much less large emergency vehicles) to pass while underground trenching activities are underway. Therefore, even Mitigation Measure TRANS-06 would not guarantee sufficient public and emergency access to the business(es) at the western edge of Landon Drive. The Final SEIR should acknowledge this potentially significant impact from Alternative 4, and then re-evaluate whether Alternative 4 is environmentally superior to the Revised Project.[6] D1-12

In addition, the DSEIR is also misleading in its depiction of the cumulative impacts stemming from alternatives. Several alternatives analyzed in the DSEIR would require undergrounding of the 230 kV lines in the Wineville Avenue public roadway leading north from Landon Drive. (DSEIR, Figure ES.3-1.) That street separates the UPS distribution facility to the west and the Frontier Communities / Barrington Place residential development to the east.[7] However, instead of fully acknowledging that the need for significant and continuous trenching and underground facilities work on Wineville Avenue would almost certainly combine with the adjacent residential construction immediately next door to create overlapping and cumulative impacts, the DSEIR simply ignores that cumulative situation, reasoning that the construction schedule for the residential project is "not yet known." (DSEIR, at p. 5-5.) This statement is inaccurate (indeed, grading on the Barrington Place project site began several months ago) and ironic given that the CPUC's impetus for preparing a subsequent EIR in the first place was the fact that development projects such as Barrington Place were being designed and commenced by D1-13

[6] It is clear that this potential impact was not considered when the DSEIR was drafted, as confirmed by the fact that Table 6.5-1, which sets for the DSEIR's ranking of the various alternatives' environmental impacts in comparison to those of the Revised Project, does not mention this potential impact at all. (*See* DSEIR, at p. 6-19.)

[7] Because the Barrington Place development requires a slight realignment of Wineville Avenue, and to reduce construction conflicts, SCE proposed to move the few overhead structures planned for the east side of Wineville Avenue to the west side as part of the Revised Project. (DSEIR, at p. 2-3.)

the time SCE filed its Application for a Certificate of Public Convenience and Necessity ("CPCN") for RTRP in 2015. The Final SEIR should account for both the cumulative impacts of the underground alternatives in combination with the adjacent residential development, as well as any potential feasibility conflicts given the simultaneous construction activities that would occur along Wineville Avenue.

D1-13

B. <u>The DSEIR's Assessment Of The No Project Alternative Is Undercut By Its Failure To Account For All Reasonably Foreseeable Development Near The RTRP Route</u>.

As mentioned above, the DSEIR acknowledges that a number of development projects (*i.e.*, Lesso Mall Development, Sky Country and Vernola Trust North) have been planned for the same properties as some of the Revised Project. Yet nowhere in the discussion of the No Project Alternative does the DSEIR account for the potential impacts those projects would cause on their own, even without any additional impacts from the Revised Project.[§] As a result, the DSEIR's comparative analysis is necessarily distorted against the Revised Project.

The CEQA Guidelines state that the analysis of the No Project Alternative should describe:

> "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. . .
> .
>
> "If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed."

D1-14

(Tit. 15, Cal. Code Regs. §§ 15126.6(e)(2), 15126.6(e)(3)(B).)

As currently drafted, the DSEIR's description of the No Project Alternative only accounts for reasonably foreseeable future activities that the *City of Riverside* might undertake to accommodate its electrical needs, such as constructing additional gas-fired power generation facilities or installing battery storage devices. (*See* DSEIR, at p. 3-31.) It completely ignores reasonably foreseeable future projects in Jurupa Valley – a curious omission given that one of the reasons the DSEIR was prepared was to gauge the potential for conflicts between RTRP and other developments. (*See* Initial Study, at p. 1-6; DSEIR, at p. 1-7.)

---

§ In the administrative proceedings regarding RTRP, several protesters argued that development of overhead electrical components would negatively affect the development potential of the properties in the area. SCE disagrees and notes that there are a multitude of opportunities for development to co-exist with overhead transmission lines, as evidenced by numerous examples throughout SCE's service territory. Regardless, even if those arguments are taken at face value, it nevertheless begs the question why the impacts from proposed developments were not accounted for in the DSEIR's assessment of the No Project Alternative.

Therefore, the description and analysis of the No Project Alternative in the Final SEIR should: a) describe these potential future developments in the entire RTRP area, not just those related to energy; and b) evaluate the environmental impacts (including, for example, agricultural land conversions) that might arise from those developments.

D1-14

IV. The DSEIR Confusingly Analyzes Revised Project Impacts Both With And Without The EPEs That Are Part Of The Project.

As explained in both the 2013 Final EIR and the new DSEIR, both RPU and SCE developed Environmental Protection Elements ("EPEs") to be included as part of the Revised Project as mechanisms to reduce environmental impacts. (DSEIR, at pp. ES-15, 2-25.) There is no question that all of the EPEs "would be implemented for the Revised Project." (DSEIR, at p. 2-25.) Nevertheless, when describing the various environmental impacts associated with the Revised Project, the DSEIR's impact analysis chapters first consider whether the Revised Project would cause any significant and unavoidable impact, even in the absence of an EPE. (DSEIR, at p. ES-15.) This approach is confusing and risks misleading the public by overstating the level of Revised Project impacts and by giving the impression that EPEs are optional (even though RTRP's proponents developed them and have long committed to implementing them).

The Final SEIR should remove any analysis of impacts that does not reflect SCE's commitment to incorporating EPEs, as they are part of the Revised Project.

D1-15

V. The DSEIR Should Be Revised To Describe Methods For Reducing Air Quality Impacts Without Resorting To Impractical Mitigation Measure AQ-03.

Given that the Revised Project would involve so much work to facilitate the construction of the underground components not proposed as part of the original RTRP, the DSEIR concludes that air quality impacts from construction emissions would be significant in the absence of mitigation measures. (*See, e.g.*, DSEIR, at pp. 4.3-30, 4.3-34.) In response, the DSEIR identifies several measures to reduce those impacts, including Mitigation Measure AQ-03 which: a) requires SCE phase construction activities such that conductor installation would not occur simultaneously with TSP foundation installation or TSP erection; and b) further restricts construction of the Proposed Project from overlapping with construction of the RPU components of the RTRP.[9] This measure is overly restrictive and its imposition may extend the duration of construction, jeopardizing the timely completion of RTRP.

D1-16

[9] The substantive text of Mitigation Measure AQ-03 reads:

> "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, construction of SCE project components shall not overlap with construction of the RPU components of the RTRP. The final construction schedule shall be provided to the CPUC at least 2 weeks prior to construction."

(DSEIR, at p. 4.3-47.)

A primary objective of RTRP is to provide RPU and its customers with adequate transmission capacity to serve existing and projected load, to provide for long-term system capacity for load growth, and to provide needed system reliability. (DSEIR, at p. 1-11.) RPU's electrical system needs are rapidly approaching critical stage, and RPU customer demand recently exceeded the amount of power supplied from SCE to RPU. (DSEIR, at p. 1-13.) As a result, timely completion of RTRP is essential to meeting the fundamental objective of accommodating RPU's growing needs.

Mitigation Measure AQ-03 threatens that objective by imposing a phasing process that may prolong construction and delay operations. MM AQ-03 could lead to cascading delays if, for example, an unexpected delay in the completion of one activity (*e.g.*, an interruption of construction activities during bird nesting season or the unforeseen need for additional geotechnical work) necessitates postponement of other activities dependent on the first, all of which would only further impede the provision of necessary power to RPU.[10] This problem would be particularly acute with regard to SCE and RPU's construction of the Wilderness and Wildlife Substations, which are planned to be located immediately adjacent to each other, and where SCE and RPU should work together and simultaneously to limit environmental impacts associated with, for example, efficiently grading the property to create stable worksites, connecting transfer lines to the respective equipment and synchronizing the relay network. D1-16

SCE recognizes the DSEIR's conclusion that emissions impacts from Revised Project construction would be significant in the absence of, among other measures, Mitigation Measure AQ-03. But that measure's absolute ban on simultaneous SCE and Riverside construction activities is excessive and potentially undermines satisfaction of the Project's objectives.

The Final SEIR should acknowledge that as long as construction emissions would remain below the significance thresholds established in the DSEIR (and no other impacts would become significant), SCE and RPU would be permitted to coordinate simultaneous construction of the Revised Project. SCE has proposed edits to Mitigation Measure AQ-03 in the comments table appended hereto to provide a more flexible approach while ensuring the emissions thresholds would not be exceeded. Regardless of other phasing that may be necessary, at a minimum, Mitigation Measure AQ-03 should be revised to allow SCE and RPU to undertake simultaneous substation construction activities in an appropriate and efficient manner given the locations of those substations and to prevent likely increases to environmental impacts if SCE and RPU's construction activities were absolutely forbidden to overlap.

[10] In addition, based on SCE's experience, hiring contractors could be more difficult given the limitations associated with Mitigation Measure AQ-03. Some contractors may be hesitant to bid on a project that involves a rigid, inflexible schedule that would deprive them of the opportunity to assign crews according to conditions in the field. At minimum, because SCE and RPU would have to constantly coordinate activities and not proceed in the most optimal manner for completing the project, a series of change orders and contract amendments could be needed to accommodate unexpected occurrences at the job site, all of which could lead to significant delays in the overall schedule, thus jeopardizing one of the primary objectives of RTRP.

VI. The DSEIR Does Not Acknowledge Legal Constraints And Financial Impacts That Could Impair The Feasibility Of Any Alternative That Requires Undergrounding In Public Roadways North Of Limonite Avenue.

Apparently considering only short-term constructability issues, the DSEIR concludes that Alternatives 1, 2, 3 and 4 would all be feasible. (DSEIR, at pp. 3-26, 3-28.) However, the DSEIR does not address potential *long-term* issues that could interfere with the permanent operation of alternatives with increasing amounts of undergrounding proposed in pubic roadways. D1-17

The CEQA Guidelines confirm that among the factors to be considered when assessing the feasibility of an alternative are whether the project proponent can reasonably control the alternative site and economic viability. (Tit. 15 Cal. Code Regs. § 15126.6, subd. (f)(1).) In addition, an agency may properly determine that an alternative is infeasible based on a policy decision that the alternative that does not achieve project objectives is undesirable from a policy standpoint. (*Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715 (decision makers may reject as "infeasible" an alternative that does not fully satisfy the objectives associated with a proposed project); *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000–1001 (substantial evidence supported a determination that environmentally superior alternatives were undesirable from a policy standpoint and therefore infeasible because they failed to achieve what the agency regarded as primary objectives of the project).)

Here, the DSEIR does not acknowledge that even if SCE were to construct one of the three alternatives that call for additional undergrounding in city streets (*i.e.*, Alternative 1 with undergrounding in Pats Ranch Road, Alternative 2 with undergrounding in Wineville Avenue or Alternative 4 with undergrounding in Landon Drive and Wineville Avenue), without additional real property rights, SCE would have no guarantee that its underground facilities would be allowed to remain permanently in place. In fact, one of the reasons SCE designed the Revised Project to avoid public streets north of Limonite is the fact that future development in the area is likely to include the installation of additional utilities in public roadways to serve that development. As a franchisor, the City of Jurupa Valley conceivably could demand in the future that some utilities (including an underground electrical transmission line installed as part of one of these alternatives) be removed and relocated to make room for other infrastructure. This is a particularly poignant concern north of Limonite Avenue given the future land uses (and likelihood of accompanying underground infrastructure) planned for development in the area. As of the date of this letter, SCE does not have adequate information to assess whether other utility equipment (such as pipes or conduits) is planned or likely to be installed in any of the same roadways where Alternatives 1, 2 and 4 would require installation of underground electrical conduits and lines. D1-18

If future utility installations are possible, the Final SEIR should disclose the fact that the City of Jurupa Valley could demand SCE remove and relocate any underground electrical lines even after they are installed, which would lead to unnecessary significant additional environmental impacts and unreasonable ratepayer expense. If a substantial possibility of such a removal action by the City of Jurupa Valley is found to exist, the Final SEIR should assess any impacts to the feasibility of constructing those alternatives, as well as any conditions that could D1-19

be added to the CPCN to help ensure that feasibility (such as a condition requiring that SCE be afforded priority land rights for its infrastructure). D1-19

VII. Conclusion

SCE appreciates the CPUC's work in analyzing the Revised Project and selected alternatives and the opportunity to provide comments on the DSEIR.[11] SCE looks forward to the CPUC's preparation of a Subsequent Final EIR and consideration of approval of the Revised Project.

Sincerely,

Robert D. Pontelle

cc: Jensen Uchida (CPUC email only)
Jack Mulligan (CPUC email only)
Laurie Hietter (Panorama email only)
Rita Wilke (Panorama email only)
Kenneth Spear (SCE email only)

Attachments: A (SCE Comments Table)
B (Excerpts from 2017 Jurupa Valley General Plan Draft EIR)

[11] SCE's comments on specific portions of the DSEIR are reflected in the comments table in Attachment A. As shown in that table, SCE's suggested deletions from the DSEIR are shown in ~~strikeout~~ format, and SCE's suggested additions to the DSEIR are shown in underline format.

3.5.1 Response to Letter D1: SCE

D1-1 MR-2 discusses the scope of the Subsequent EIR, noting that only impacts resulting from the Proposed Project changes or change in circumstances not analyzed in the certified 2013 RTRP EIR are at issue and must be evaluated to determine whether there are new significant impacts. These changes, referred to as the "Revised Project," include a shift in the overhead transmission line on Wineville Avenue from the east side to the west side, the underground alignment, and the modifications at Distribution Line Relocations #7 and #8. Additionally, the most recent GIS data provided by SCE in response to Data Request 6, in July 2017, indicates that the Revised Project design would result in the change of one overhead structure (JD9A) from a TSP to an LST along I-15, north of the riser poles. Chapter 2: Project Description clearly defines the components of the Proposed Project that are included in the Revised Project and provides construction and maintenance activities associated with the Revised Project. Table 2.2-1 and Table 2.2-2 provide details for all components, including the overhead 230-kV transmission, underground 230-kV transmission line, and distribution line relocations. The comment letter reference to the overhead 230-kV transmission line along I-15 in Table 2.4-1 is to the LST (JD9A) adjacent to I-15 and just north of the riser poles. The remainder of the overhead 230-kV transmission line north of this LST (JD9A) to the LST (JD22) at the corner of Landon Drive and Wineville Avenue is not re-evaluated.

MR-2 discusses the adequacy of the certified 2013 RTRP EIR for the Proposed Project elements that have not changed since 2013. Only the Revised Project was analyzed in the Subsequent EIR because the other unchanged components of the Proposed Project were adequately analyzed in the certified 2013 RTRP EIR and further analysis is not required.

The entire Proposed Project was evaluated in the Subsequent EIR for three environmental resource areas: Air Quality, Greenhouse Gases, and Tribal Cultural Resources. Regulations related to these resources have changed since the certification of the certified 2013 RTRP EIR and represent a change in circumstances.

D1-2 SCE's comment compares impacts of the Revised Project to the impacts of the proposed 2013 alignment. The proposed 2013 alignment analyzed in the certified 2013 RTRP EIR is no longer feasible due to the new entitled developments existing and approved within the original right-of-way. Consistent with CEQA Guidelines Section 15126.6(a), the proposed 2013 alignment was not considered as an alternative to the Revised Project because that project is no longer feasible. The current Proposed Project, including Revised Project elements, is the project under review by the CPUC. The CPUC has acknowledged that the Revised Project would reduce some impacts when compared to the proposed 2013 alignment. However, since the proposed 2013 alignment is infeasible, a

comprehensive comparison of impacts with the Revised Project is not required or beneficial to the public or decision makers.

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of potentially feasible alternatives to a project, or to the location of the project, that would feasibly attain most of the basic project objectives while reducing or avoiding any of the project's significant environmental effects. Alternatives were developed to reduce impacts of the Revised Project, not the proposed 2013 alignment. The CPUC's review of the Revised Project elements determined that the Revised Project would result in significant and unavoidable impacts on aesthetics, agriculture, noise, and traffic. The CPUC conducted an intensive alternatives screening process in which 31 alternatives, including the No Project Alternative, were considered. Alternatives analyzed in the Subsequent EIR meet all project objectives and feasibility criteria and avoid or reduce impacts of the Revised Project. Underground Alternatives 1 and 2 reduce the impact of the overhead riser poles and eliminate impacts on agriculture.

SCE's comment states that the CPUC imposed underground alternatives that were "needlessly designed to avoid impacts from portions of the RTRP that have not even changed" since the certification of the 2013 RTRP EIR. The CPUC's alternatives screening methodology included a screening review all of the alternatives that were proposed by the public and agencies during the scoping process for the Subsequent EIR. Alternative 10 was suggested by the public during scoping but would not avoid or reduce environmental impacts associated with the Revised Project and would increase impacts, as described in Table 3.4-1 of Chapter 3: Alternatives. Alternative 10 was therefore eliminated from further consideration.

Impacts associated with alternatives, including Alternative 4, were compared to the Revised Project impacts, not the proposed 2013 alignment impacts, to determine whether an impact would be avoided or reduced. The information that the overhead 230-kV transmission line was historically on the east side of Wineville Avenue is not relevant to the Revised Project or alternatives analysis. No impacts from this overhead segment were identified in the certified 2013 RTRP EIR, but due to the change in circumstances and location of this segment, further analysis was conducted. The Revised Project, in proximity to the new residential development along Wineville Avenue, would result in a significant and unavoidable impact on aesthetics. Alternatives 1, 2, and 4 would reduce the aesthetics impacts associated with the overhead 230-kV transmission line on Wineville Avenue.

D1-3 As stated in response D1-2, a comparison of impacts between the proposed 2013 alignment and the Revised Project is not required or beneficial to the public. The robust list of alternatives screened in Chapter 3: Alternatives were developed

from many sources including alternatives suggested by the public. The public suggested several alternatives that may reduce some impacts of the proposed 2013 alignment but would not reduce impacts of the Revised Project. These alternatives were eliminated from further analysis because they would have greater environmental impacts than the Revised Project. Alternatives 1 through 4 were carried forward for analysis as they were feasible, met objectives, and would avoid and/or reduce impacts of the Revised Project.

The Subsequent EIR alternatives screening process was focused on reducing or avoiding the impacts of the Revised Project. Response D1-1 notes that the components of the Proposed Project included in the Revised Project are only those that have changed and have the potential for greater impacts than were analyzed in the certified 2013 RTRP EIR, in accordance with CEQA Section 15162.

D1-4 CEQA Guidelines Section 15126.6 requires an evaluation of alternatives and ultimately a comparison of the impacts associated with each alternative and with the impacts of the proposed project. The intent of the alternatives analysis is to avoid or substantially lessen significant environmental impacts of the proposed project. Alternatives 1 through 4 would substantially reduce or eliminate several permanent impacts associated with the Revised Project, as described in greater detail in Chapter 6: Comparison of Alternatives. No new impacts would be created compared to the Revised Project, but Alternatives 1 and 2 would increase several short-term significant and unavoidable impacts. The CPUC finds that it is beneficial to identify whether an impact is permanent or temporary for the public to fundamentally understand the differences between alternatives. CEQA Guidelines do not dictate specifically how ranking of impacts must be conducted to aid the comparison of alternatives aside from the requirement that significant impacts be avoided or reduced compared to the proposed project. The CPUC determined that elimination, or substantial reduction, of a permanent significant and unavoidable impact is a lesser impact than an increased temporary significant and unavoidable impact.

D1-5 The impacts of Alternative 1 through 4, as well as the No Project Alternative, in comparison to the Revised Project are considered in Chapter 6: Comparison of Alternatives. The Revised Project elements are located in an area where residential and recreation land uses border the project or have a clear view of the riser poles. Additionally, the riser poles near Limonite Avenue are located within a moderately sensitive viewshed because the overpass is considered a gateway into the City of Jurupa Valley. The industrial features of overhead transmission infrastructure are better suited for the visual characteristics of an industrial land use. Alternatives 1, 2, 3, and 4 result in the relocation of the Limonite Avenue riser poles closer to industrial land uses. Construction of Alternatives 1 and 2 would relocate the riser poles to Cantu-Galleano Ranch Road and locate the riser

poles near existing overhead transmission facilities. Construction of Alternative 3 would move the riser poles north along I-15 and away from the gateway at Limonite Avenue. Construction of Alternative 4 would move the riser poles away from existing residential land uses and toward the I-15 freeway. Impacts on agriculture would be avoided by Alternatives 1 and 2. Construction of Alternative 4 and the Revised Project would result in the same impact on agriculture and increased impacts on agriculture would occur from Alternative 3.

Impacts from Alternatives 1, 2, and 4 on air quality would be mitigated to a less-than-significant level through the implementation of MMs AQ-01, AQ-02, AQ-03, and AQ-04. Significant noise and traffic impacts that would occur from construction of the underground segment of the Revised Project would be increased with implementation of Alternatives 1, 2, or 4.

D1-6 CPUC acknowledges and agrees with SCE that the Revised Project riser poles would not be constructed within a scenic view corridor or along a designated scenic highway, nor would riser poles obstruct a designated scenic vista. The Initial Study Checklist (Appendix B) and Section 4.1.7 of the Subsequent EIR present consistent determinations regarding scenic vistas and scenic resources. As such, additional analysis of the Revised Project under these impact criteria are not included in the Subsequent EIR. The Subsequent EIR analysis focuses on aesthetic impacts of the Revised Project and the alternatives related to the potential to impact visual character and/or quality. Although the riser poles would be located several hundred feet from air and noise sensitive receptors, the poles would be visible due to their size and height. The riser poles at Limonite Avenue would be visible to motorists, pedestrians, recreationalists, and residents within the area. The riser poles within the Goose Creek Golf Club would be visible to golfers, recreationalists on trails south of the Santa Ana River, and residential streets within Norco.

D1-7 The CPUC considers all significant and unavoidable impacts when ranking environmental superiority of the Revised Project and the alternatives. The long-term impacts on aesthetics and agricultural resources as well as the short-term noise and traffic impacts are considered in the comparison of alternatives in Chapter 6. A significant and unavoidable impact on aesthetics and agriculture due to the riser poles located north of Limonite Avenue would occur from the Revised Project and Alternative 3. Significant long-term impacts north of Limonite Avenue would be avoided in Alternatives 1, 2, and 4. The long-term aesthetic impacts in the Goose Creek Golf Club would still occur. Refer to response D1-4 for further details regarding the intent behind ranking significant and unavoidable impacts as permanent or temporary.

SCE's statement that long-term impacts on cultural resources are directly correlated to greater ground disturbance is not accurate. The potential to uncover

an unknown cultural resource in the Revised Project area is low because of the substantial disturbance in the roadways to install existing utilities. Impacts on cultural resources for each alternative were accurately analyzed in the Subsequent EIR. Impacts on undiscovered resources would be greater under the alternatives compared to the Revised Project, but would still be mitigable. In the event an undiscovered resource is uncovered, mitigation (MM CUL-02B and MM CUL-02C) requires construction to cease or divert, avoidance of the resource, evaluation of the resource, and scientific data recovery if the resource cannot be avoided, which would reduce impacts. The same mitigation measures are required for overhead construction as for underground construction for the Revised Project.

D1-8 At the time the NOP was issued, the land adjacent to I-15 was designated by the state as prime agriculture, with active agricultural operations. Entitlements are either not approved or not under construction in this area. The City of Jurupa Valley designates this area for a mixture of medium-density residential and commercial uses in the City of Jurupa Valley Draft 2017 General Plan (Figure 4.9-2 in Section 4.9: Land Use and Planning of the Subsequent EIR). The Jurupa Valley zoning designations are similar (Figure 4.9-3 in Section 4.9: Land Use and Planning of the Subsequent EIR). Significant impacts on Farmland are identified in the City of Jurupa Valley 2017 General Plan EIR due to the land use designations resulting in a change from prime agriculture to developed land. Identification of impacts from implementation of the General Plan does not relieve CPUC of the responsibility of identifying impacts that are attributable to a project under their jurisdiction. An applicant that is subject to the General Plan may tier off the General Plan and need not disclose further impacts (PRC § 21083.3). SCE is not subject to the jurisdiction of the City of Jurupa Valley, nor any part of the General Plan. The CPUC is therefore required to disclose the impacts on Farmland irrespective of the already analyzed General Plan impacts (PRC § 21002.1[a]).

Further, although development projects have been identified and may be reasonably foreseeable (as described in the Draft Subsequent EIR Chapter 5: Cumulative Impacts), it would be an error of omission for the Subsequent EIR to fail to identify impacts on prime farmland that may result from construction of the Revised Project. The loss of prime farmland based on the possibility that the Revised Project would impact Farmland prior to the development of the area for commercial and residential uses is fairly attributed in the Subsequent EIR. As such, the analysis of impacts on farmland in the Subsequent EIR is not double counting. The possibility that the area will be developed prior to the Revised Project has been considered and is reflected in the contingent nature of the mitigation. Specifically, the mitigation (MM AGR-03) defined by the CPUC requires a pre-construction assessment to ensure that the

farmland is not already converted to non-agricultural use prior to the construction of the Revised Project.

D1-9 The analysis of alternatives to the Revised Project is conducted in a way that identifies the increased or reduced impacts of an alternative when compared to the Revised Project. This approach to the alternatives analysis also reduces text that would be duplicated under each alternatives analysis. For example, each alternative would connect with the proposed underground route on Pats Ranch Road and the same impacts would occur along the underground route on Pats Ranch Road and 68th Street regardless of whether the CPUC selects the Revised Project or an alternative. An analysis of the impacts associated with this segment of the transmission line would be lengthy and repetitive. The text under the heading "Alternatives Analysis Scope" clarifies that impacts associated with the Revised Project segments would occur, unless those impacts would be avoided by an alternative. Chapter 6: Comparison of Alternatives compares only the differences in the alternatives and the Revised Project; it is not necessary to compare project elements that would be constructed under any CPUC project-approval scenario.

D1-10 Construction is not planned on weekends when the park is most frequently used and MM TRANS-02 prohibits construction during peak traffic hours. Access to Vernola Park via the main entrance may be affected between the hours of 9:00 am and 3:30 pm. Vernola Park contains athletic fields that would likely be used for ball games or practices generally on weekends or weekday afternoons. Vernola Park would be available to park visitors throughout construction, and fully accessible from all entrances during peak park-use hours.

Construction of Alternative 2 would not require full closure of the entire Wineville Avenue segment from Bellegrave Avenue to Limonite Avenue. SCE has stated that vault installation would require a construction area of 15,000 square feet. Underground duct bank installation requires a 30-foot-wide work space. Wineville Avenue is approximately 80 feet wide near the entrance to Vernola Park. Construction would require temporary and periodic closure of short segments of Wineville Avenue to permit installation of the vaults (up to 7 work days per vault). The analysis of Alternative 2 in Section 4.12: Recreation, and other sections, is based on this aspect of the construction process as described by SCE. Preliminary engineering drawings provided to the CPUC do not show vault structures directly in front of the parking lot driveway. There would be no need to block the entrance to the park for an extended period of time, based on CPUC experience with construction techniques used for other underground transmission line construction projects, such as the Sycamore-Peñasquitos 230-kV Transmission Line Project.

In addition, temporary lane closures on Wineville Avenue would not prohibit access to Vernola Park. Additional analysis has been added to Section 4.12: Recreation, shown below, to support the conclusion of less than significant.

> Alternatives 1 and 2 construction activities at the corner of Bellegrave Avenue and Wineville Avenue would occur adjacent to Vernola Family Park and Turnleaf Community Park. Construction would take place primarily in the roadway, similar to the Revised Project, and would not directly cause physical deterioration of either park. The entrance and parking facility for Vernola Family Park is located on Wineville Avenue. The park can also be accessed from Pats Ranch Road from which street parking is available. Temporary road and lane closures would occur along Pats Ranch Road during construction of Alternative 1 and along Wineville Avenue during construction of Alternative 2. Although access to the entrance on Pats Ranch Road and street parking could be temporarily disrupted during construction of Alternative 1, visitors would still be able to access the park from Wineville Avenue. Full closure of the entire Wineville Avenue segment from Bellegrave Avenue to Limonite Avenue is not anticipated. Access to the parking facility from at least one direction of Wineville Avenue would be maintained throughout construction of Alternative 2. Construction of Alternatives 1 and 2 would not ~~impact~~ eliminate access to the park. Construction noise may temporarily deter park users and interfere with recreational activities for up to 5 weeks (likely non-consecutive) when construction would occur adjacent to the park. Park visitors would not need to use other recreational facilities during construction of these alternatives; therefore, substantial deterioration of other nearby recreational facilities as a result of construction around Vernola Park would not occur. ***The impact on parks would be less than significant.***

MM REC-03 is also clarified as shown in underlined text below:

MM REC-03: Maintain Access to Trails and Parks
SCE shall identify existing alternate routes to allow park, trail, and path users to ~~circumvent~~ access parks or alternate trail segments for those areas that are inaccessible or closed due to construction activities. Trail detours must be located on existing trails or unvegetated areas and shall not be located where they could impact sensitive biological resources. Trail detours may be placed along the perimeter of active work areas or through inactive work areas when it is safe to do so. Proposed alternate routes shall be delineated on project plans and provided to the CPUC at least 30 days prior to construction for review and approval. Signs shall be posted at trail entrances to inform trail users of construction activities that may be encountered, such as excavations, and vehicles and equipment on trails.
Applicable Locations: Revised Project construction work and staging areas at 68th Street and Lucretia Avenue, 68th Street and Dana Avenue, Limonite Avenue and Pats Ranch Road, Landon Drive and Wineville Avenue, and at Distribution Line Relocations #7 and #8

Performance Standards and Timing:

- **Prior to Construction:** Submittal of proposed alternative park, trail, and bike path routes to CPUC for review and approval at least 30 days prior to construction
- **During Construction:** SCE installs and maintains signs informing trail users of detours or closures
- **Following Construction:** N/A

D1-11 Installation of the duct bank would require a temporary work space of 30 feet wide as provided in response to Data Request 7. Only one duct bank would be installed at any one time along a roadway segment. Landon Drive is approximately 55 feet wide and the minimum size for roadway lanes is generally 10 to 12 feet wide. As such, adequate space is available on Landon Drive to maintain a minimum of one open lane throughout construction of the duct bank.

The 15,000-square-foot (100-feet-wide by 150-feet-long) work area for vault installations was analyzed in relation to traffic impacts. In the analysis in Section 4.13: Transportation and Traffic, it is acknowledged that road closures would occur along Landon Drive for installation of the vaults. MM TRANS-05 and MM TRANS-06 require SCE or its construction contractors to provide the ability to quickly lay a temporary steel plate trench bridge upon request in order to ensure driveway access to businesses during construction. They shall provide continuous access to properties when not actively constructing the underground 230-kV transmission line. The actual trench size for the vault would be 12 feet wide by 52 feet long; therefore, plating may not be necessary to provide access to passing emergency vehicles. Installation of vaults for other underground 230-kV transmission line projects, such as the Sycamore-Peñasquitos 230-kV Transmission Line Project, have much smaller work areas and have not required full road closures.

D1-12 Adequate space exists on Landon Drive to maintain a minimum of one open lane during duct bank installation. MM TRANS-06, as noted by the commenter, requires placement of steel plating over underground work areas and vehicles/equipment to be removed to the greatest extent feasible to permit uninterrupted traffic flow. The plates would address the unlikely emergency situation where a full-scale evacuation and clear roadways are needed. It is feasible to cover the vault trench in the event of an emergency. MM TRANS-06 requires work to stop to allow emergency vehicle passage. Adequate space exists on Landon Drive to allow emergency vehicle passage without covering the trench, as noted in response D1-11. No change to the ranking of alternatives is necessary.

D1-13 An analysis of the cumulative impacts from construction of the Revised Project and cumulative projects, including Frontier Communities/ Barrington Place (#8) was presented in Chapter 5: Cumulative Impacts. The discussion in Chapter 5:

Cumulative Impacts does not specifically highlight any relationship between the alternatives and the cumulative project in question, but it does disclose the relative cumulative impacts for each alternative when compared to the Revised Project. The cumulative alternatives analysis discloses that cumulative impacts from Alternatives 1, 2 and 4 will be greater than the Revised Project for several resources particularly air quality, noise, and traffic.

D1-14 Foreseeable future projects that are not under the jurisdiction of RPU or CPUC are considered in the cumulative analysis. The CPUC assumes that the land bordering the Revised Project area would be developed eventually, with or without the Revised Project. Under the No Project Alternative, development could occur across all parcels adjacent to the I-15 corridor and would not need to avoid the right-of-way included as part of the Revised Project. Environmental impacts from these cumulative projects are discussed as cumulative impacts.

D1-15 CPUC determined that the Subsequent EIR analysis should disclose the impact of a project prior to the application of EPEs and after the application of EPEs. This approach ensures that all significant impacts of the project are fully disclosed and the analysis is consistent with recent CEQA case law (specifically *Lotus v. Department of Transportation* [2014] 223 Cal App 4th 645). The issue with not presenting the analysis in this way is that a significant impact could be masked by incorporation of EPEs into the project that are actually mitigation measures designed to reduce the impact. The incorporation of EPEs in such a way precludes the possibility of considering other mitigation measures that could be more effective. Failure to identify the impact prior to incorporation of an EPE and use of EPEs instead of mitigation measures would eliminate the trigger requiring adoption of an enforceable mitigation monitoring program. This approach further clarifies the nexus between mitigation measures and significant impacts. It differentiates between EPEs that may be applied to less-than-significant impacts and mitigation measures that are applied to significant impacts, since only significant impacts require mitigation measures under CEQA. CPUC monitors implementation of EPEs as well as the MMs throughout the project. Thus, it is important to clearly state the EPEs and the avoided impacts in the EIR. This method of assessing project impacts is standard CPUC protocol.

D1-16 The air quality analysis was prepared based on the construction schedule provided by SCE and shown in Appendix A. In accordance with that schedule, there would be an overlap of 5 days when conductor installation would be occurring simultaneously with TSP foundation installation and TSP erection activities. A delay of 5 days is deemed feasible considering the overall schedule of 26 months for the Proposed Project. No change to that portion of the mitigation measure is made.

In response to the concerns raised that several Proposed Project and RPU components depend on one another, and the effect such a restriction could have on schedule, MM AQ-03 has been revised. Revisions to MM AQ-03 permit overlapping construction of the Proposed Project and RPU components with calculation evidence provided to the CPUC that the overlapping construction activities would not emit air pollutants in excess of SCAQMD significance thresholds. A detailed analysis of the emissions generated during construction of the Proposed Project and RPU components combined was not conducted to identify which components could overlap. As such, specific restrictions or allowances are not detailed.

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

D1-17 The feasibility of the alternatives was determined based on existing underground utilities in the roadways at the time the NOP was issued. The CPUC did review feasibility of future installation of underground utilities, particularly along Pats Ranch Road, in light of the cumulative projects. Adequate space was determined to exist for installation of utilities for connection to the cumulative projects (Williams, 2018). No conflicts from underground utilities precluding operation of the alternatives or Revised Project were known at the time the Subsequent EIR was prepared. The potential long-term impacts associated with the alternatives is addressed in the Subsequent EIR. The long-term impacts of the alternatives are identified in the Alternatives Impact Analysis sections of each resource section (e.g. Aesthetics, Recreation, etc.) under the operation and maintenance analyses.

D1-18 As described in response D1-17, adequate space in existing roadways exists to allow construction and operation of the alternatives as well as permitting buildout of cumulative projects and associated underground utilities. The possibility that the City of Jurupa Valley exercises their franchise right to require

SCE to relocate the underground 230-kV transmission line, in accordance with PRC § 6297, is outside the scope of CEQA at this time. In the event that relocation is required to allow a lawful change to the roadways, future environmental documentation may be necessary to analyze the impacts. CPUC has sole discretion over the siting of the 230-kV transmission line, and would determine where the line could be relocated.

Comment Letter D2

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Section	Page(s)	SCE Recommended Language	Reason for SCE Language	
Project Description	**2-1**	• Relocated 0.4 miles of Overhead 230-kV Double-Circuit Transmission Line to west side of Wineville Ave. • ~~New~~ Undergrounding of the 2.1 miles of the ~~Underground~~ previously proposed overhead-230-kV Double-Circuit Transmission Line in City of Jurupa Valley	SCE recommends this change to clarify the scale of the Project's changes (as shown in Figure 1.2-3).	D2-1
Project Description	**2-1, fn.1**	SCE proposes ~~two~~ double-circuit transmission lines that would be attached to the same set of overhead ~~pole~~ structures, but placed in separate underground duct banks.	SCE is proposing a double circuit transmission line and not two double circuit lines. Also, the circuits are on both towers and poles, or collectively "structures."	D2-2
Project Description	**2-2 – 2-3**	Summary of Revised Project Components ~~Transmission Infrastructure and Changes from 2013 Project~~ … LSTs would be ~~115 feet and~~ approximately 120 feet tall. … TSPs would be ~~90 feet and 170~~ approximately 120 feet tall. … Vaults: The proposed 2013 alignment did not include transmission line vaults because an underground segment was not proposed. This portion of the Revised Project replaces 13 overhead structures from the Proposed Project, which would have predominantly been located on private property.	This table does not accurately the nature and extent of the proposed changes to RTRP compared to its original 2013 configuration. There are various changes RPU and SCE have proposed to accommodate certain concerns of nearby residents and the public at large, and those revisions should be acknowledged in the Final SEIR. SCE also notes that the description of "Vaults" on page 2-3 is repeated.	D2-3

1

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Project Description	**2-3**	The Revised Project would include the relocation of 0.4 miles of overhead 230-kV double-circuit transmission line from the east to the west side of Wineville Road in order to avoid potential conflicts with planned development and street improvements.	Edits suggested for accuracy and to describe rationale for change.	D2-4
Project Description	**2-3, fn. 2**	~~Alternating current is commonly transmitted in three phases (A, B, and C) of voltage waves. A transmission line circuit consists of three conductor wires sets; each set of conductors carries a separate phase of electrical current A double-circuit transmission line consists of six conductor wires sets (two conductors per phase)~~	SCE suggests striking this footnote because it is inaccurate (SCE's double circuit overhead line is comprised of 12 individual conductors) and it is irrelevant to the description of the revised project relocation.	D2-5
Project Description	**2-5**	The Revised Project would ~~include~~ replace 13 overhead structures with approximately 2 miles of underground 230-kV double-circuit transmission line placed in buried, concrete-encased duct banks....	Edit suggested for accuracy and to capture the full extent of the proposed changes. The revised project is not only adding 2 miles of underground transmission, but it is also eliminating 13 overhead structures along I-15 and south of Limonite.	D2-6
Project Description	**2-11**	[General comment regarding Revised Project details.]	Table 2.2-2 describes distribution changes at location 3 and 5, including removals of facilities which are currently visible from KOPs in the aesthetics chapter. These descriptions in Table 2.2-2 should also be described in Chapter 4.1 Aesthetics. The removal of these distribution structures are an improvement of aesthetic conditions and warrant discussion. Please also see comments made regarding pages 4.1-22 of the Aesthetic Impacts analysis.	D2-7
Project Description	**2-15**	Riser poles would be spaced approximately ~~150~~ 80 feet apart.	Edit suggested for accuracy.	D2-8

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Project Description	**2-15**	The excess excavated soil would be trucked to a locally permitted landfill for disposal.	Edit suggested for accuracy. Soil excavated would be backfilled when possible or repurposed within the project area.	D2-9
Project Description	**2-16**	Each cable pull would be approximately 1,500 feet in length. Vaults would be required for cable pulling and splicing during construction, ~~and manholes would be required along the underground transmission alignment~~ as well as for maintenance and inspection during transmission line operation.	Edit suggested for accuracy. The Revised Project is installing vaults not manhole covers for transmission.	D2-10
Project Description	**2-16**	Smaller vaults or manholes would be installed within a 7-foot-long by 7-foot-wide by 9-foot-deep excavation for access to collocated underground telecommunication lines.	Edit suggested for accuracy. Smaller vaults or manholes may be used for telecom facilities.	D2-11
Project Description	**2-16, fn.4**	A cable pull is the action of pulling the ~~conductor~~ cable between underground vaults on the same circuit. Vaults are spaced approximately 1,500 feet apart….	Edit suggested for accuracy. It is not actually just a conductor but a cable system that is being used for underground.	D2-12
Project Description	**2-19**	Waste materials that can be recycled and salvaged would be gathered by construction crews ~~and separated into roll-off boxes. Salvageable items (e.g., conductor, steel, and hardware) would be transported to the marshalling yards, sorted, baled, and then sold through available markets.~~ Items that may be recycled include: nuts, bolts, washers, and other small hardware; conductor wire; and larger hardware (e.g., shackles, clevises, yoke plates, links, or other connectors used to support the conductor).	Edit suggested for accuracy.	D2-13
Project Description	**2-23**	~~Error! Reference source not found.~~ Table 2.4-3	Edit suggested to correct reference error.	D2-14

3

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Project Description	**2-24**	~~All~~ Except for vaults, materials associated with construction efforts would be delivered by truck to established marshalling yards. Vaults may be directly delivered from manufacturers' facilities to their planned installation locations.	Edit suggested for accuracy based on actual practice.	D2-15
Project Description	**2-24**	The underground vaults would be routinely inspected to ensure structural integrity of the ~~conduetor~~ cable system and vaults.	Edit suggested for accuracy.	D2-16
Alternatives	**3-6**	Aesthetic impact from the riser poles proposed on the north side of Limonite Avenue ~~and the placement of overhead transmission towers along Wineville Avenue~~.	Edit suggested for accuracy. The relocation of overhead structures from the east to west side of Wineville Avenue was proposed in order to *reduce* potential conflicts with planned development and street improvements and to mitigate environmental impacts, but some structures were always proposed for that area.	D2-17
Alternatives	**3-6**	~~Agricultural resource impact from the loss of Prime Farmland at vaults within the agricultural area north of Limonite Avenue~~.	Loss of Prime Farmland is already considered a significant and un-mitigable impact caused by development as anticipated in the Jurupa Valley General Plan Draft EIR (at page 4.2-14). Therefore, cumulative impacts in the area associated with the vaults have already been considered in other CEQA analyses. Please also see comments made regarding the Agricultural Impacts analysis.	D2-18
Alternatives	**3-26**	Alternative 1 meets the basic project objectives, is feasible, and would avoid the Revised Project's significant aesthetic impacts from riser poles at Limonite Avenue and transmission tower at Wineville Avenue. ~~Pats Ranch Road north of Limonite Avenue has not been constructed, and there is ample work space available to construct the underground line in this area. Bellegrave Avenue and Wineville Avenue are~~	Detailed engineering has not been performed on Alternative 1 to determine potential conflicts with existing utilities and/or to confirm the roadways will provide sufficient work space. SCE notes the Revised Project provides greater potential workspace for construction than Alternative 1. Pat's Ranch Road, north of Limonite, has already been partially	D2-19

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		~~sufficiently wide to accommodate the underground transmission line and duct banks within the ROW. Alternative 1 has, therefore, been retained for full analysis in this Subsequent EIR.~~ Alternative 1 may result in....	constructed adjacent to the new residential developments. It is assumed that the road will be further built out as residential units are completed along the east side of Pat's Ranch Road and Wineville. SCE is concerned that such construction would also include underground utilities to serve those developments, thus further reducing the available space for an underground 230 kV line, and therefore impacting the ability to construct Alternative 1.	D2-19
Alternatives	**3-26**	Alternative 2 meets the basic project objectives, is feasible, and would avoid the Revised Project's significant aesthetic impact from riser poles at Limonite Avenue and transmission poles along Wineville Avenue. ~~Wineville Avenue is sufficiently wide to accommodate the underground transmission line and duct banks within the ROW. This alternative has, therefore, been retained for full analysis in this Subsequent EIR.~~ ~~The~~ Alternative 2 may result in additional construction noise and traffic impacts, increased air pollutant emissions, and greater potential for induced current effects (i.e., shock hazard, corrosion of adjacent buried utilities). The impact of construction noise and traffic from the Revised Project would not be avoided.	Detailed engineering has not been performed on Alternative 2 to determine potential conflicts with existing utilities and/or to confirm the roadways will provide sufficient work space.	D2-20
Alternatives	**3-28**	.... This alternative has, therefore, been retained for full analysis in this Subsequent EIR. ~~The~~ Alternative 4 may result in additional construction noise and traffic impacts, increased air pollutant emissions, and greater potential for induced current effects (i.e., shock hazard, corrosion of adjacent buried utilities)....	Revisions suggested for consistency with the other alternative rationales.	D2-21

5

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Aesthetics	**4.1-21**	~~Views of the graded work areas would persist after construction because it would take time for vegetation to reestablish in areas that are temporarily disturbed by construction~~.	The areas being impacted by the revised project, *i.e.*, the riser poles, are in areas with agricultural activity. These areas are presumably subject to routine disturbance given their use as agriculture. No revegetation should be required.	D2-22
Aesthetics	**4.1-22 – 4.1-23**	[General comment regarding Revised Project details.]	The distribution line relocation discussion should also include relevant details from Project Description Table 2.2-2 regarding infrastructure originally planned at distribution locations 3 and 5 which have been removed in the Revised Project, as well as the corresponding reductions in aesthetic impacts compared to was originally proposed. (*See* DSEIR Table 2.2-2, at p. 2-11.)	D2-23
Aesthetics	**4.1-44 – 4.1-45**	…The viewer sensitivity at Vernola Park would be ~~high~~ moderate because viewer exposure is ~~high~~ moderate. The overall impact on visual quality at KOP 4 is moderate. A moderate impact on visual change in areas with ~~high~~ moderate viewer sensitivity would result in a less-than-significant impact on visual quality.	The overhead infrastructure would be far from the Vernola Park and located across a large agricultural field. Viewer exposure would not be high given that distance. SCE therefore suggests the assessment be revised to moderate, and less-than-significant.	D2-24
Aesthetics	**4.1-45**	An overhead ~~115~~66-kV transmission line exists within the golf course, but the riser poles of the Revised Project are substantially larger than the TSPs that support the existing ~~115~~66-kV transmission line.	Edit suggested for accuracy.	D2-25

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Aesthetics	**4.1-46**	***MM AES-01: Restore Construction Impacts to Vegetation*** SCE shall conduct a pre-construction site assessment of all locations where Revised Project construction activities have the potential to disturb ~~existing vegetation, including~~ native and landscaped vegetation. … Documentation of completed landscaping or revegetation shall be submitted to the CPUC for final approval within 30 days of ~~project~~ revegetation or landscaping completion.	SCE suggests striking "existing vegetation" because portions of revised project will impact non-native vegetation and agricultural lands along the I-15 corridor and it is not reasonable to develop a revegetation or landscaping plan for these areas. Also, SCE has clarified that the completion report would be submitted within 30 days of completing the landscaping or revegetation and not construction/project completion.	D2-26
Aesthetics	**4.1-47**	**Impacts Avoided by the Alternatives** Alternatives 1 through 4 would be constructed in the same general project area as the revised project and would have no impact on three CEQA Appendix G significance criteria: a. Have a substantial adverse effect on a scenic vista b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway c. ~~Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area~~	Per the text on DSEIR pages 4.1-47 and 4.1-48, impacts to light and glare should not be discussed further in the chapter.	D2-27
Aesthetics	**4.1-53**	***Views from Vernola Park (KOP 4)*** The post-construction impact of the riser poles would be closer, but similar to the Revised Project impact at KOP 4 described in Section 4.1: Aesthetics, Impact Aesthetics-c. … . Viewer sensitivity at Vernola Park would be ~~high~~ moderate because viewer exposure is ~~high~~ moderate. The impact on visual quality from Alternative 3 at KOP 4 would be moderate and a less-than-significant impact would occur.	The above-ground infrastructure for Alternative 3 would be quite a distance from Vernola Park; the riser poles in particular would be about a mile away. Such infrastructure is not expected to prominently figure in the viewshed.	D2-28

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Aesthetics	**4.1-62 - 4.1-63**	Figure 4.1-28: KOP 3 – Baseline Photograph – ~~Vernola Park~~ Rosebud Lane Looking ~~Southwest~~ West And Figure 4.1-29 KOP 3 – Photosimulation (After Alternative 4) – ~~Vernola Park~~ Rosebud Lane Looking ~~Southwest~~ West	Figures are mislabeled; KOP 3 does not appear to show a view of or from Vernola Park.	D2-29
Agriculture & Forestry Resources	**4.2-11**	~~MM-AGR-01 requires SCE to restore the soil profile of farmland impacted during construction to pre-construction conditions. All farmland impacted by temporary workspace requirements and construction of underground duct banks would be restored.~~ ***Temporary impacts on important farmland would be less than significant*** ~~***with mitigation***~~***.***	According to the Jurupa Valley 2017 General Plan, this area is identified for commercial development. It would not be reasonable to restore soil profiles if the area is expected to be graded and converted shortly after (or even before) construction. Moreover, the disturbance area needed for spoils sorting and storage would have a larger temporary impact on those agricultural properties during construction. In addition, this impact has already been accounted for given that the Jurupa Valley General Plan also acknowledges the loss of the Prime Farmland along the I-15 corridor as a significant impact that cannot be mitigated.	D2-30
Agriculture & Forestry Resources	**4.2-12**	~~MM-AGR-01: Restore Soils (from 2013 RTRP EIR)Restore soils to pre-project conditions:~~ ~~• Replace soils in a manner that shall minimize negative impacts on crop productivity by stockpiling surface and subsurface layers separately and returning those layers to their pre-construction locations in the soil profile.~~ ~~• The top soil layers shall be ripped to restore compacted soils to their original density. Ripping may also be used in areas where vehicle and equipment traffic have compacted the top soil layers.~~	On page 3-56 of the 2013 FEIR the impacts to Farmlands of Statewide Significance was addressed in the area of Location 8 (location of Wilderness and Wildlife Substations). The determination of the 2013 FEIR was No Impact, therefore the underground at this location would also not be significant for the same reasons. Additionally, this area has not been used since the 1970s for agriculture. It has been rezoned for non-agricultural purposes and it is anticipated that it will not be used for future agriculture. This MM applied to Location 8 would not mitigate for any agricultural impacts, but may needlessly result in additional disturbance area to stockpile soils.	D2-31

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Air Quality and Greenhouse Gas Emissions	**4.3-9**	[General comment regarding Table 4.3-4]	There is a reference in the notes for Table 4.3-4 (**Local Ambient Air Quality Concentrations at Nearby Monitory Stations**) to "Bold values exceed applicable standard." However, no values are presented in bold font. Either the note should be modified or there should be a bold entry in the table.	D2-32
Air Quality and Greenhouse Gas Emissions	**4.3-25**	~~No other construction activity could occur within this work area due to space and safety constraints. Although several construction activities could occur simultaneously they would not occur in the same area as one another.~~	Construction areas are expected to overlap. For example, the duct bank installation area overlaps with the vault installation area. Multiple construction activities are expected to happen within the same area.	D2-33
Air Quality and Greenhouse Gas Emissions	**4.3-29**	SCAB is currently in violation of ozone and particulate matter air quality standards, as identified in Table 4.3-11. The Proposed Project would contribute to the existing air quality violations by emitting ozone precursors (NOx ~~and ROG~~) and particulate matter in excess of the SCAQMD significance thresholds.	A portion of the quoted language seems to be incorrect, asserting there is an exceedance of ROG. This is inconsistent with DSEIR Table 4.3-11 that appears to show ROG does not exceed the applicable threshold.	D2-34
Air Quality and Greenhouse Gas Emissions	**4.3-35 - 4.3-38**	The closest sensitive receptors to underground construction of the 230-kV transmission line, located approximately [INSERT MISSING TEXT] concentrations of PM10 at the closest residence to overhead construction activities also would exceed the significance threshold, as shown in Table 4.3-17…	The last sentence on page 4.3-35 appears to be incomplete, missing its last part. In addition, the first sentence on page 4.3-38 appears to be missing its first part.	D2-35

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Air Quality and Greenhouse Gas Emissions	**4.3-45**	MM AQ-01: Fugitive Dust Control Plan (Incorporates 2013 RTRP EIR MMs AQ-07 thru AQ-13 and AQ-18) … ~~A wheel-washing system shall be installed, if needed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the unpaved construction site.~~ ~~The construction contractor shall use street sweepers (using reclaimed water, when available) that comply with SCAQMD Rules 1186 and 1186.1. The street sweepers, where necessary to clean up track out, shall operate for the length of the truck route to and from unpaved construction areas including the marshalling yards and in between construction sites.~~ ~~Operations on unpaved surfaces would be effectively stabilized of dust emissions (e.g. using water or chemical stabilizer/suppressant), however shall be suspended when winds exceed 25 miles per hour. When wind speeds (ie. Winds exceeding 25 mph) are high enough to result in dust emissions crossing the work boundary, despite the application of dust mitigation measures, grading and earthmoving operations shall be suspended.~~ ~~Visible dust plumes, generated within the project work area, shall not occur during periods when soil is being disturbed by equipment or by wind at any time. If dust plumes are visible or a dust complaint is lodged, dust control may be achieved by applying water before/during earthwork and onto unpaved traffic areas, use of dust suppressants, phasing work to limit dust, and/or setting up wind fences to limit wind blown dust.~~	Mitigation Measure AQ-1 is overly restrictive as written, and there are a variety of other methods to control or mitigate dust during construction activities. Therefore, SCE suggests replacing the measure with substitute text, similar to what was used on the CPUC's EIR for SCE's Valley-Ivyglen project.

D2-36

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		The applicant would implement the following fugitive dust control measures for the RTRP: • Water three times per day or as needed during excavation, bulldozing, scraping, and grading activities, in order to ensure compliance with SCAQMD Rule 403, Fugitive Dust. • Water storage piles twice a day, resulting in a 50% fugitive dust control efficiency. • Limit vehicle speeds on unpaved roads to 15 miles per hour, per SCAQMD's Table XI-A, Mitigation Measure Examples; Fugitive Dust from Construction and Demolition (Rev. 4/2007).		D2-36
Air Quality and Greenhouse Gas Emissions	4.3-47	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, construction of SCE project components shall not overlap with construction of the RPU components of the RTRP, except where the coordinated construction of areas common to both SCE's and RPU's scopes of work is necessary, or where overlapping construction will not increase air quality emissions. The final construction schedule shall be provided to the CPUC at least 2 weeks prior to construction.	Construction of certain elements common to both SCE and RPU scopes of work will require coordinated and simultaneous construction to avoid unnecessary increases in environmental impacts. For example, the construction of Wilderness and Wildlife substations will share a commonly graded pad, and their interconnection will require simultaneous efforts by SCE and RPU crews. Further, certain construction activities unlikely to significantly impact air quality emissions should be allowed to be undertaken in order to minimize environmental impacts associated with construction delays where possible. This may be verified at the time SCE submits its Notice to Proceed Requests.	D2-37

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Air Quality and Greenhouse Gas Emissions	**4.3-50**	~~**Impact Air-a: Would Alternative 1, 2, or 4 conflict with or obstruct implementation of the applicable air quality plan?**~~ ~~and~~ Impact Air-b: Would Alternative 1, 2, or 4 violate an air quality standard or contribute substantially to an existing or projected air quality violation?	Page 4.3-49 asserts that "[a]ll alternatives would have *no impact*" (emphasis added) on the air quality or GHG significance criterion regarding conflicts with applicable plans and that "[i]mpacts associated with these significance criteria are not discussed further." Consistent with the DSEIR's assertions of page 4.3-49, there is no need to mitigate and/or discuss Impact Air a further. Its reference on page 4.3-50 is inconsistent, confusing, and should be stricken.	D2-40
Air Quality and Greenhouse Gas Emissions	**4.3-59**	**MM AQ-04: Limitation of Daily Construction Activities** The following equipment limitations apply to the identified construction activities: • Vault Installation - No more than 39 ~~vehicles/equipment~~ off-road vehicles may be operating concurrently on an active work site~~, including truck trips providing materials to and from the work site,~~ in any one day • Duct Bank Installation - No more than 31 ~~vehicles/equipment~~ off-road vehicles may be operating concurrently on an active work site~~, including truck trips providing materials to and from the work site,~~ in any one day • Underground Cable Installation - No more than 7 ~~vehicles/equipment~~ off-road vehicles may be operating concurrently on an active work site~~, including truck trips providing materials to and from the work site,~~ in any one day • Cable Terminating - No more than 5 ~~vehicles/equipment~~ off-road vehicles may be operating concurrently on an active work site~~, including~~	On-road vehicle emissions account for a relatively small percentage of emissions, compared to off-road vehicles. On-road vehicles, such as personnel vehicles and delivery truck trips will be impossible to accurately monitor and police daily counts for each active work site. Therefore, it would seem appropriate to track daily off-road equipment usage only, as this would still accomplish the intent of the mitigation without disproportionate requirements.	D2-41

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		~~truck trips providing materials to and from the work site,~~ in any one day • Cable Splicing - No more than 8 ~~vehicles/equipment~~ off-road vehicles may be operating concurrently on an active work site~~, including truck trips providing materials to and from the work site,~~ in any one day		D2-41
Biological Resources	**4.4-38**	Applicable EPEs are identified and mitigation is defined to avoid or reduce significant impacts on biological resources. The significance of the impact is ~~first~~ considered ~~prior to~~ after ~~application of~~ the effect of any EPEs is taken into account ~~and a significance determination is made. The implementation of EPEs is then considered when determining whether impacts would be significant and thus would require mitigation~~ Under CEQA, impacts remaining significant after consideration of any EPEs warrant mitigation where feasible. Mitigation measures included in the 2013 RTRP, with modifications when appropriate, and/or additional new mitigation measures are identified to reduce significant impacts of the Revised Project.	EPEs (or APMs) are appropriately considered part of the proposed Project. Significance determinations should be made after the EPEs/APMs are taken into account. Mitigation measures should be imposed only if the impact remains significant after the APMs/EPEs are taken into account. To do otherwise is confusing and creates a disincentive for Applicants to propose EPEs/APMs. To the extent this analytical change requires reconsideration of environmental impacts described in the DSEIR, SCE requests that such impacts be revised accordingly in the Final SEIR.	D2-42
Biological Resources	**4.4-39**	**Table 4.4-9: Summary of Revised Project Impacts on Biological Resources**	The summary and comparison of impacts in this table are misleading. The evaluation should focus on impacts not addressed in the 2013 City of Riverside FEIR. If the change in project description or environmental conditions caused the impact to increase, that should be noted. Similarly, if there is no change in the severity of impact, or the impact decreases from that disclosed in the FEIR that should be noted. As presented, the analysis does not disclose the significance of the change in environmental impact, but rather seems to take the DSEIR as an invitation to perform the entire analysis again. This is misleading, seeming to suggest that the project	D2-43

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

			changes are causing environmental impacts already covered in the FEIR.	D2-43
Biological Resources	**4.4-54**	**MM BIO-09A: Weed Control Plan.** To support invasive species management, SCE shall prepare and implement a comprehensive Weed Control Plan for invasive, non-native species abatement. Developed land shall be excluded from weed control. The Weed Control Plan shall include specific weed abatement methods, practices, and treatment timing developed specifically for the Revised Project area by qualified individuals ~~with at least 5 years of weed control experience within Riverside County~~. …	Limiting the selection of weed control personnel is overly prescriptive, unnecessary, and not in SCE customer's interests. SCE should be able to find the best qualified contractors for this type of work. If unduly constrained, this may create inefficiencies resulting in ratepayers being forced to shoulder higher rates than an open, competitive market would provide, and could result in potentially lower-quality work. Invasive species environments exist throughout California and there are numerous qualified contractors from those areas whose services would be appropriate for this measure.	D2-44
Cultural, Tribal Cultural and Paleontological Resources	**4.5-28**	**MM CUL-02: Archaeological Monitoring (from 2013 RTRP EIR)** To avoid and/or minimize impacts to significant cultural resources, a qualified archaeologist will monitor ground-disturbing activities near previously identified cultural resources. If a newly identified cultural resource or an unknown component of a previously identified resource is discovered during construction, the monitor will follow the Unanticipated Discovery Plan identified in EPE CUL-05. The monitor will have the authority to stop or redirect work, as required to fulfill mitigation measure CUL-02. In addition, any human remains discovered during Project activities will be protected in accordance with current state law as detailed in California Health and Safety Code 7050.5 and California Public Resources Code Sections 5097.91 and 5097.98, as amended. **Applicable Locations:** All Proposed Project areas where ground disturbance occurs <u>within 50 feet of known cultural resource.</u>	Edits suggested for clarification and to ensure the appropriate scope of monitoring requirements.	D2-45

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		Standards and Timing: • **Prior to Construction:** N/A • **During Construction:** Ground disturbance near known cultural resources is monitored; Unanticipated Discovery Plan is implemented if needed; Procedures for discovery of human remains implemented per state law • **Following Construction:** N/A		D2-45
Cultural, Tribal Cultural and Paleontological Resources	**4.5-29**	**MM CUL-02A: Tribal Resource Monitoring** To avoid and/or minimize impacts on significant tribal cultural resources, a qualified archaeologist will monitor ground-disturbing activities near previously identified cultural resources. In addition, a qualified archaeologist will monitor all ground-disturbing activities along the Proposed Project 230 kV underground alignment between Lucretia Avenue in Jurupa Valley and the Wildlife Substation. If a newly identified cultural resource or an unknown component of a previously identified resource is discovered during construction, the monitor will follow the Cultural Resources Monitoring and Treatment Plan (CRMTP) as defined in MM CUL-02B. The monitor will have the authority to stop or redirect work, as required to avoid and/or minimize impacts on tribal cultural resources. **Applicable Locations:** All Proposed Project areas where ground disturbance occurs within 50 feet of known cultural resource and 230 kV underground alignment. **Performance Standards and Timing:** • **Prior to Construction:** N/A • **During Construction:** Ground disturbance near (1) known cultural resources and (2) the Proposed Project alignment between Lucretia Avenue and Wildlife Substation is monitored; CRMTP is implemented if needed	Edits suggested for clarification and to ensure the appropriate scope of monitoring requirements.	D2-46

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		• **Following Construction:** N/A		D2-46
Cultural, Tribal Cultural and Paleontological Resources	4.5-29	*Qualified Archaeological Monitors*.... If unanticipated cultural resources are discovered the archaeological monitor(s) shall ~~be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources.~~ initiate a temporary hold on construction activity if the discovery is located in an active construction area. If the discovery is an archaeological site, construction will not continue in the area until the resources is evaluate and determine the appropriate next steps, in consultation with the Project archaeologist. *Tribal Cultural Monitor.* SCE shall retain a tribal cultural monitor(s) from consulting tribes (i.e., Pechanga Band of Luiseño Indians and Gabrieleño Band of Mission Indians–Kizh Nation). The tribal cultural monitor(s) shall monitor all ground-disturbing activities ~~that the consulting tribes believe warrant monitoring, represent tribal concerns, and communicate necessary information with their respective tribal councils~~ as defined in the CRMTP. If construction activities require tribal cultural monitors from multiple tribes, SCE shall coordinate a revolving schedule between the consulting tribes. SCE shall provide the documentation of coordination and a fully executed Cultural Resources Monitoring and Treatment Agreement with the monitoring tribe(s) outreach efforts and the name and credentials of the proposed Native American monitor(s) to the CPUC for approval at least 14 days prior to construction. The Tribes shall be given the opportunity to consult with the qualified archaeologist and provide input on the draft CRMTP during its preparation, including the Evaluation Plan and Data Recovery Plan. Upon completion of the draft CRMTP, the consulting tribes shall be given at least 30 days to provide	SCE's comments on this measure generally address two concepts: 1. Monitors cannot direct construction crews where to work. They can only halt crews in areas where resources are located. 2. Tribal monitoring locations should only be determined by the relevant tribe. Monitoring areas must be defined in the CRMPT prior to construction in consultation with the Tribes, CPRC and SCE.	D2-47

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		input on the draft CRMTP. Evidence of consultation with the Tribes shall be submitted to the CPUC. The tribal cultural monitor(s) will inform the archaeological monitor if any unanticipated tribal resources are discovered. The archaeological monitor will communicate with construction initiate a temporary hold on construction activity if the discovery is located in an active construction area. If the discovery is an archaeological site, construction will not continue in the area until the resources is evaluate and determine the appropriate next steps, in consultation with the Project archaeologist. ~~shall be granted the authority to temporarily halt and redirect grading in the immediate area of a find in order to evaluate the find and determine the appropriate next steps, in consultation with the Project archaeologist~~ **Cultural Resource Monitoring** • The purpose of cultural resource monitoring is to ensure proper implementation of all avoidance procedures so that cultural resources, if present, are not irretrievably lost, damaged, destroyed, or otherwise adversely affected. Cultural resource monitoring shall be conducted during all ground-disturbing activities within 50 feet of known cultural resource and the 230 kV underground alignment. (i.e., vegetation clearing, excavation, grading, and staging area/marshalling yard preparation within unpaved yards). The requirements for archaeological and tribal cultural monitoring shall be noted on ~~construction plans and~~ the worker environmental awareness training handouts. Monitors shall cease monitoring if older quaternary alluvium soils and/or bedrock is encountered. • Monitoring teams shall work under the direct supervision of the Qualified Archaeologist in conjunction with a tribal cultural monitor. The Qualified Archaeologist and tribal cultural monitor shall attend preconstruction meetings for the project. Monitoring teams shall include one qualified archaeological monitor and one tribal cultural monitor. In the		D2-47

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		event that ground-disturbing activities occur simultaneously in multiple locations requiring monitoring, a monitoring team shall be required at each location. ... • **Environmentally Sensitive Areas (ESA) Delineation.** The CRMTP shall describe how historical resources eligible or potentially eligible for listing in the California Register of Historic Resources (CRHR), significant archaeological resources, and tribal cultural resources deemed significant by the tribe(s) (collectively referred to as "significant resources") will be delineated and avoided as ESAs during construction. ESAs containing cultural resources shall not be identified ~~on the ground or~~ on maps to be used by anyone other than the Qualified Archaeologist, archaeological monitors, and tribal cultural monitors. They shall be labeled on maps and with signage in the field as "environmentally sensitive areas." ~~The sole preferred method of mitigation in the CRMTP for known significant resources shall be total avoidance of the resource (preservation in place), per CEQA Guidelines Section 15126.4(b)(3)(A).~~ The preferred method of mitigation in the CRMTP for unanticipated resources shall be total avoidance (preservation in place). If avoidance is determined to be infeasible by the CPUC, the Qualified Archaeologist, in consultation with CPUC, SCE, and consulting tribe(s), shall prepare an Evaluation Plan and Data Recovery Plan.		D2-47
Cultural, Tribal Cultural and Paleontological Resources	**4.5-33**	[General comment regarding Mitigation Measure CUL-02C]	MM CUL-02C: Cultural Resource Training appears to be excessive given that SCE has already committed to ensuring that WEAP training is provided.	D2-48
Cultural, Tribal Cultural and Paleontological Resources	**4.5-33**	[General comment regarding Mitigation Measure CUL-02D]	MM CUL-02D: Procedures for Discovery of Human Remains is unnecessary and repetitive. These procedures will be outlined in the CRTMP.	D2-49

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Cultural, Tribal Cultural and Paleontological Resources	4.5-34	~~**MM CUL-02E: Tribal Cultural Resource Avoidance Procedures**~~ ~~SCE shall submit final construction plans to the consulting tribes and the CPUC at least 60 days prior to construction. The CPUC shall review these plans with the consulting tribes to identify any potential conflicts between the final work spaces/infrastructure locations (e.g., pole or vault locations, spur roads) and recorded tribal cultural resources. Where potential conflicts exist, the cultural resource(s) shall be evaluated according to the procedures identified in MM CUL-02B.~~ ~~When any changes in proposed activities are necessary to avoid cultural resources (e.g., project modifications or redesign), construction plans shall be modified to reflect the agreed upon changes before initiating any construction activities in the area subject to the change. Revised construction plans shall be submitted to the CPUC and affected consulting tribes at least 14 days prior to construction for confirmation of incorporated changes.~~ ~~No activities shall be conducted within the boundaries of a known tribal cultural resource until SCE has obtained concurrence on avoidance and minimization methods from affected consulting tribes. The CPUC shall make a final determination if SCE cannot obtain concurrence from the tribes within 60 days of initial identification of the potential cultural resource conflict.~~ ~~Designated approved work spaces shall be physically demarcated under the direction of the Qualified Archaeologist, in consultation with the tribal cultural monitor, to ensure exclusion of known tribal cultural resources. Construction crews shall be instructed to work within designated approved work areas.~~	This mitigation measure is unnecessary and repetitive. These procedures will be outlined in the CRTMP.

D2-50

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Cultural, Tribal Cultural and Paleontological Resources	**4.5-34**	**MM CUL-02E: Tribal Cultural Resource Avoidance Procedures** In the event of an inadvertent discovery, no activities shall be conducted within the boundaries of a known tribal cultural resource until SCE has obtained concurrence on avoidance and minimization methods from affected consulting tribes. The CPUC shall make a final determination if SCE cannot obtain concurrence from the tribes within 30 ~~60~~ days of initial identification of the potential cultural resource conflict.	SCE suggests a shorter schedule would still be appropriate to achieve the purpose of this measure while also driving interested entities to consensus while maintaining the construction schedule.	D2-51
Cultural, Tribal Cultural and Paleontological Resources	**4.5-35**	**MM CUL-04A: Paleontological Monitoring (Low-Sensitivity Formations)** Ground-disturbing activities that occur in areas with indeterminate, ~~low,~~ or marginal paleontological sensitivity may be monitored on a part-time ~~basis at the discretion of the qualified paleontologist~~ as outlined in the Paleontological Monitoring and Treatment Plan (PMTP). **Applicable Locations:** Excavations in project areas as outlined in the PMTP.	Monitoring of areas with low paleontological sensitives is not standard practice. Areas to be monitored should be determined prior to construction and outlined in a PMTP.	D2-52
Hazards and Hazardous Materials	**4.7-18**	**Table 4.7-3 Summary of Revised Project Impacts from Hazards and Hazardous Materials** Impact Hazards-i: Would the Revised Project expose workers or the public to excessive shock hazards? **Project Phase:** Operation and Maintenance: **Significance before EPEs:** Less than Significant **Significance after EPEs and before Mitigation:** Less than Significant	The 220 kV steel structures are insulated from the conductors via insulators. It is extremely unlikely that 220 kV conductors would fall on steel structures, street light poles, and steel gas, potable, or recycled water mains, making them become energized. Also, it is also unlikely that the public will come in contact with buried metallic pipes. Therefore the shock hazard during O&M should be "less than significant."	D2-53

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Hazards and Hazardous Materials	**4.7-25**	**MM HAZ-05: Induced Current Touch Study** SCE shall identify both aboveground and underground objects (e.g., metal fences or buried metal utility lines) in the vicinity of the Proposed Project that may potentially present a shock hazard to the public, due to induced currents or voltages. SCE shall prepare an Induced Current Touch study that evaluates the conductive and inductive interference effects of the Proposed Project components on the identified objects. The Induced Current Touch study shall model the conductive objects using the maximum anticipated voltage for the proposed 230-kV line and shall consider the construction details for the transmission line. The study shall also construct a model using fault conditions. ~~The maximum acceptable touch voltage under steady-state conditions is 15 volts and the threshold for fault conditions is specified in ANSI/IEEE Standard 80.~~ In the event that the modeled induced current or voltage of a conductive objective exceeds hazardous shock thresholds ~~maximum touch voltage thresholds~~, SCE shall install grounding or other appropriate measures to protect the public from hazardous shocks according to SCE standards. The Induced Current Touch study shall include the model voltage results of conductive objects prior to implementation of grounding measures and after implementation of grounding measures.	It is standard procedure for SCE to identify conductive objects that are large in surface area or have a long parallel segment with the transmission line, and SCE will ensure those objects that can potentially contribute to shock concerns are properly grounded. Because of SCE's existing practices in this regard, the thresholds set forth in the original draft of Mitigation Measure HAZ-05 seem to be arbitrary and unnecessary. In fact, the ANSI/IEEE Standard 80 applies to substations, not transmission lines. SCE suggests revisions be made to this measure to reflect applicable practices.

D2-54

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Hazards and Hazardous Materials	**4.7-24 and 4.7-31**	[General comment regarding hazards in the area of Alternative 1.]	Table 4.7-4 (on page 4.7-27) does not identify any natural gas pipelines as an underground utility feature that could pose a hazard for Alternative 1. Only a potable water main, a raw water line and sewer and operational mains are listed. However, the text on page 4.7-31 states, "Natural gas pipelines would be the only hazardous materials likely to occur in the Alternative 1 alignment." This discrepancy should be resolved to clarify whether a natural gas pipeline does exist near the Alternative 1 route, as well as to accurately identify any other identified hazards near Alternative 1.	D2-55
Hazards and Hazardous Materials	**4.7.33**	**Operation and Maintenance** It is extremely unlikely that the public would come in contact with underground metallic utility lines, and as drafted Table 4.11-2 shows no known underground metallic public utilities lines in the immediate area. SCE will perform inspection for underground utility lines and implement MM HAZ-05 if necessary. ~~There is the potential for inductive and conductive interference between the Alternative 1 and 4 underground transmission line and existing conductive objects (e.g., metallic utility lines) within or in close proximity to the Alternative 1 and 4 underground transmission lines. Impacts to workers and the public could be potentially significant if the touch voltage exceeds safety thresholds. Implementation of MM HAZ-05 would reduce the touch voltage under steady-state and fault conditions to below threshold levels. SCE would prepare an Induced Current Touch study and install protection measures. Impacts would be less than significant with mitigation.~~		D2-56

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Land Use and Planning	**4-9-18**	**Easements** The southern end of the Revised Project, including the eastern underground segment and the eastern riser poles would be constructed within the existing easement SCE holds on the Goose Creek Golf Club. This easement ~~may~~ will need to be widened to cover access to and maintenance of transmission facilities.	SCE confirms the need for a wider easement at this location.	D2-57
Noise	**4.10-6**	**Table 4.10-2: Summary of Ambient Noise Levels near the Revised Project** Overhead Alignment on Wineville Avenue Dominant Noise Sources LT-1 ~~Overhead Alignment on Wineville Avenue~~ Vehicle/truck traffic	The table should be revised to accurately reflect dominant noise sources in the area of Wineville Avenue and Cantu-Galleano Ranch Road. Corona noise should not be listed as the dominant noise source, when in the paragraph preceding the table in the text on page 4.10-5 corona noise was found in testing to be not audible. This is misleading and the dominant noise source is from traffic at this intersection.	D2-58
Noise	**4.10-6**	[General comment regarding Table 4.10-2: Summary of Ambient Noise Levels near the Revised Project]	In Table 4.10-2: Summary of Ambient Noise Levels near the Revised Project, there are no definitions for the reference notations: *, a, b, or c.	D2-59
Noise	**4.10-17**	To maintain appropriate classroom noise levels during instructional periods, the CPUC will consider hourly noise levels that exceed 65 dBA (Leq), or exceeds 10 dBA above ambient levels—whichever is greater, at a classroom facility to be the impact threshold.	Ambient noise levels near ST-6 (Van Der Mollen Middle School) already exceed 65dBA during the day. Therefore it is unclear how the DSEIR concludes that impacts from the Revised Project would be significant if this 65 dBA threshold is already exceeded in the existing baseline conditions. The DSEIR should identify any additive impact, and determine and disclose whether that would be significant.	D2-60

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Noise	**4.10-18**	**Table 4.10-7: Summary of Revised Project Impacts on Noise** **Impact Noise-a:** Would the Revised Project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?	The DSEIR should clearly acknowledge that ambient noise already exceeds planning standards at certain locations, and from there consider whether the Revised Project would add to the existing dBA at these locations at a level greater than 5 dBA, which according to the DSEIR is a detectable change to the human ear. If the temporary increase in noise from construction is less than 5 dBA above ambient conditions, then Revised Project impacts should be noted as less-than-significant, and mitigation should not be required.	D2-61
Noise	**4.10-19**	**Construction** **Overhead and Underground Construction.** ... Construction of the entire 2-mile underground 230-kV transmission line would take approximately 18 months, and would require concrete saws, excavators, and other earth-moving equipment. Underground construction at Distribution Line Relocations #7 and #8 would not require as much time and will not require the heavy equipment needed for the 230 kV component. ~~similar equipment~~. 230 kV t~~T~~rench, ~~and~~ vault and cable installation for the Revised Project would move along the underground alignment during construction. Receptors along the underground alignment would be exposed to construction noise for up to 3 weeks~~, excluding weekends,~~ during vault installation, and for shorter time periods during trenching, and cable installation, excluding weekends, however construction in the area will take place over a period of 18 months.	SCE suggests edits to this section to reflect the fact that construction techniques, equipment and durations between the 230 kV portions and the distribution portions of the Revised Project would be different. In addition, SCE estimates that construction of the underground portions of Alternative 1 and Alternative 2 would take approximately 31 and 32 total months, respectively. Thus, although construction would occur at varied places along the route of whichever alternative is ultimately selected, noise would be introduced into the community for that entire length of time.	D2-62

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Noise	**4.10-21**	…MM NOI-01 limits the use of high-noise-generating equipment to between 9:00 am and 3:00 pm on weekdays, assuring compliance with Jurupa Valley General Plan Policy NE 3.5. High-noise generating equipment would not exceed local noise standards. In the event that high-noise-generating equipment is needed beyond the allowable weekday hours within 25 ft of sensitive receptors SCE will erect noise barriers, utilized noise monitoring equipment and have a noise monitor present to ensure noise does not exceed allowable limits. ~~and t~~The impact would be less than significant with mitigation.	Because of the extent of the underground construction near sensitive receptors, including proposed alternatives, SCE suggests the language change to allow for extended construction hours to minimize duration of construction near sensitive receptors. Also, please note that SCE has been successful on other projects (*i.e.*, Lakeview) in implementing sound barriers, and effective monitoring to minimize or prevent significant impacts from high-noise generating equipment.	D2-63
Noise	**4.10-22**	~~**Temporary Trench Plates**~~ ~~Noise generated when vehicles cross skid resistant metal trench plates has been observed at 79 dBA (Lmax) at a distance of 50 feet (Panorama Environmental, Inc., 2018)~~	The statements in this analysis and the subsequent Mitigation Measure NOI-3 imply that speeds at which cars hit skid plates are a factor in generating noise. The references suggest this was an observation from a project in San Diego. It has not been observed by SCE or, to SCE's knowledge, documented in complaints by the public for other SCE projects. SCE suggests deleting mitigation measure NOI-3 or providing additional description regarding the impact described. In particular, the DSEIR should identify the condition and speed at which 79 dBA was measured, and confirm whether such conditions and speed typically occur on Pat's Ranch Road and 68th Street. SCE already plans to implement measures to reduce speeds in areas of construction, so the DSEIR should consider whether conditions would still exist in which noise thresholds will be exceeded given those restrictions, and specify what kind of trench plate was used in the 2018 observation and consider whether the same devices would be used by SCE.	D2-64

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Noise	**4.10-23 – 4.10-24**	MM NOI-02 also requires SCE to plan all construction activities, where practicable and safe, such that they are finished by 7:00 pm when activities occur within 300 feet of sensitive receptors, thereby avoiding exceedance of the outdoor noise threshold for non-construction time periods. ***Nighttime construction would not exceed local noise standards and would be less than significant with mitigation.*** The applicant shall provide a written request to the CPUC regarding any construction that will occur during the hours of 7:00 p.m. to 7:00 a.m. or on Sundays and any legally proclaimed holidays. The written request shall include justification of why work must occur during these hours/days, and a detailed description of work activities and location to be performed. The applicant must receive approval from the CPUC prior to any construction work occurring during these times.	Similar noticing standards for hours to those suggested in this comment have been adopted for previous SCE projects, including Valley-Ivyglen.	D2-65
Noise	**4.10-24**	[General comments regarding ambient noise and the existing environmental setting]	The paragraph discussing noise impacts at Louis Vandermolen Fundamental Elementary School should be revised and clarified. For example, with the existing sound wall, and the assumed dBA from construction at 77dBA, what is the dBA at the nearest classroom? Is 560 ft the distance to the nearest classroom? Also, SCE noise measurements recorded much higher dBA at ST-6. The DSEIR should provide the ambient noise at the school location, and consider the added noise impact from construction beyond ambient noise at that location.	D266
Noise	**4.10-29**	SCE would implement EPE NOI-01, EPE NOI-02, EPE NOI-03, and EPE NOI-04. Complaint reporting and investigation procedures would help to alert SCE to public concerns about construction noise but would not reduce noise levels at	Edits are suggested to more accurately reflect the language in EPE NOI-03.	D2-67

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		receptors. Adjusting back-up alarms and limiting equipment idling would help to reduce noise levels but would not adequately reduce noise from all equipment. Underground construction would occur within city streets, which would limit the amount of space for positioning equipment farther away from receptors. Use of mufflers, ~~portable barriers~~ non-noise-producing mobile equipment such as trailers, and acoustical panels would reduce construction noise by 8 to 10 dBA; however, noise increases would still be significant.		D2-67
Noise	**4.10-34**	**MM NOI-1: High –Noise-Generating Equipment** SCE shall implement typical noise-reducing construction practices as identified in EPE NOI-03 and EPE NOI-4 to reduce noise levels when working within 100 feet of receptors. If high-noise-generating equipment must be used, SCE shall limit the use of high-noise-generating equipment to, where practicable and safe, between the hours of 9:00 am and 3:00 pm when constructing within 100 feet of receptors in the City of Jurupa Valley. In the event that high-noise-generating equipment is needed beyond the allowable weekday hours within 100 ft of sensitive receptors SCE will erect noise barriers, utilized noise monitoring equipment and have a noise monitor present to ensure noise does not exceed allowable limits. High-noise-generating equipment shall be defined as any piece of equipment that generates a maximum (Lmax) noise level of 85 dBA or greater at a reference distance of 50 feet from a sensitive receptor where noise mitigating structures (such as sound walls) do not exist.	SCE has been successful on other projects (*i.e.*, Lakeview) in implementing sound barriers and monitoring to minimize or prevent significant impacts from high-noise generating equipment. Because of the extent of the underground construction near sensitive receptors, especially from the alternatives, SCE suggests the language change to allow for extended construction hours to minimize the overall duration of construction near sensitive receptors.	D2-68

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Noise	**4.10-34 – 4.10-35**	SCE shall plan all construction activities within 300 feet of receptors, including concrete pours, where practicable and safe, such that they are completed by 6:00 pm in Jurupa Valley and 7:00 pm in Riverside to avoid conflicts with local jurisdiction noise ordinances. SCE shall implement all available noise reduction techniques identified in EPEs NOI-03 and NOI-04 in construction areas within 300 feet of sensitive receptors (residences and schools) to reduce noise levels at the receptors. Construction meetings, site setup or cleanup activities that occur outside of City-identified construction hours must meet the noise ordinance limits (measured at receptors) of 55 dBA between 7:00 pm and 10:00 pm and 45 dBA between 10:00 pm and 7:00 am.	This measure would be problematic as drafted in the DSEIR, particularly with regard to concrete pours which cannot be stopped once started. Although rare, the consequence would be that the concrete pour would have to stop, and the next day jackhammers and other heavy equipment (noise generators) would have to be used to wastefully remove the unfinished concrete pour from the previous day (and thereby cause additional noise impacts). SCE's suggested added language would recognize this potential and allow for activities to continue in these rare instances.	D2-69
Noise	**4.10-35**	**MM NOI -3 Trench Plate Noise Reduction** ~~SCE shall implement techniques to reduce noise generated by vehicle traffic over temporary trench plates. These techniques shall include one or more of the following, as necessary:~~ ~~• Implement traffic calming measures to reduce vehicle speeds~~ ~~• Ensure trench plates are appropriately secured~~ ~~• Utilize trench plates of a low noise generating material~~	Please see SCE's previous comment regarding modeled vehicle speeds and trench plates.	D2-70
Noise	**4.10-35**	**MM NOI-4: Construction Notification** SCE shall provide notice by mail at least 1 week prior to construction activities to all sensitive receptors and residences within ~~500~~ 300 feet of all construction. The announcement shall state where and when project construction will occur and provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction. Notices shall also include the phone number for the noise complaint telephone hot-line described in EPE NOI-1. ~~Notified residents may request alternative lodging for the days that active construction is occurring adjacent to their residence;~~	First, SCE generally sends notifications to owners of property within 300 feet. It is recommended that the same radius be used here for practicality and reasonableness. Second, mitigation measures MM NOI-1, NOI-2 and NOI-3 and project EPEs already require SCE to reduce noise impacts or plan construction during hours in accordance with City General Plans and Ordinances. State law requires that there be an essential nexus between each mitigation measure and a legitimate governmental interest. (Tit. 14, Cal.	D2-71

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		~~alternative lodging shall consist of a standard room at a hotel located within 6 miles of the affected residence or as close as feasible.~~	Code Regs. § 15126.4, subd. (a)(4)(A); *Nollan v. California Coastal Comm'n*, 483 U.S. 825, 834-837 (1987).) Furthermore, the mitigation measure must be roughly proportional to the impacts caused by the project. (Tit. 14, Cal. Code Regs. § 15126.4, subd. (a)(4)(B); *Dolan v. City of Tigard*, 512 U.S. 374, 391 (1994).) Here, given the effect of other measures in reducing impacts to less-than-significant levels, further actions (including providing temporary lodging) would be excessive and disproportionate.	D2-71
Noise	**4.10-36**	[General comment regarding Table 4.10-11, Sensitive Receptors near Alternative Alignments]	Table 4.10-11, Sensitive Receptors near Alternative Alignments, does not identify passive recreation areas as sensitive receptors. This is inconsistent with the DSEIR's list of what constitutes sensitive receptors (see DSEIR, p. 4.10-7). If passive recreation areas were considered to be sensitive receptors for purposes of analyzing impacts from the Revised Project, then the analysis should be revised to consider similar areas (such as Limonite Meadows Park, Vernola Family Park, park on northeast corner of Bellegrave and Wineville Avenue) to be sensitive receptors for purposes of the alternatives as well. Please revise this table to include such recreation areas as appropriate.	D2-72
Noise	**4.10-43**	[General comment regarding noise associated with the No Project Alternative]	In section 4.10.12 (No Project Alternative Impact Analysis), the DSEIR should consider noise conditions associated with the No Project Alternative, including noise associated with other land uses proposed for the RTRP area, and assess whether they would exceed significance thresholds or violate ordinance or General Plan guidelines separate from the Revised Project.	D2-73

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Public Services and Utilities	**4.11-7**	The Revised Project is located near existing buried metallic utility pipelines. Alternating current can cause corrosion on buried utility pipelines located near a power line if the current density would exceed the design standards for protection of the metallic pipelines. Pipeline design limits (i.e., tolerance) to alternating current are calculated based on the conductance of the metallic material (i.e., steel, ductile iron) and size of the pipeline. ~~European Standard CEN/TS 15280 provides guidelines for evaluating the likelihood of corrosion from alternating current density: a pipeline is considered protected from alternating current corrosion if the root mean square alternating current density is lower than 30 amperes per square meter.~~	There are no universal design standards used by SCE for determining the guidelines for such analysis. SCE coordinates with affected utilities regarding requirements and standards.	D2-74
Public Services and Utilities	**4.11-10**	SCE shall notify all utility companies with utilities located within or crossing SCE ROW and franchise agreement areas to locate and mark existing underground utilities along the entire length of the revised overhead and underground alignments at least 30 days prior to construction. Any conflicts will be addressed with the affected utility and resolved during final engineering. ~~No subsurface work shall be conducted that would conflict with (i.e., directly impact or compromise the integrity of) a buried utility. In the event of a conflict, the Revised Project alignment shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering~~. SCE shall provide CPUC with documentation of contact and response from the utility companies prior to construction. SCE shall also provide documentation of any changes in the Revised Project alignment for review and approval at least 30 days prior to construction.	SCE suggests edits to this analysis based on SCE's existing process and procedures when encountering other utilities during engineering, which have proven effective.	D2-75

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Public Services and Utilities	**4.11-11**	**MM UTIL-03: Cathodic Protection** During final engineering SCE will determine the location of adjacent utilities. If SCE identifies utilities in proximity of the proposed transmission line that may be susceptible to corrosion due to induced currents or voltages, SCE shall conduct an alternating current interference study that evaluates the alternating current interference effects of the proposed 230-kV transmission line on nearby parallel metallic pipelines. The study shall include the development of a model using the maximum anticipated voltage for the proposed transmission line and shall consider the construction specifications for the transmission line, including conductor arrangement. ~~In addition, SCE shall identify utility facilities within 100 feet~~ affected proximity ~~of the proposed transmission line that may be susceptible to corrosion due to induced currents or voltages. For all utilities identified with a corrosion potential,~~ SCE shall coordinate with the owner of the utility and use data gathered in the alternating current interference study to determine appropriate design measures to protect the pipeline from corrosion, such as ground mats or gradient control wires for cathodic protection of the buried utility pipelines. The study, summary of coordination with potentially affected utilities, and specifications of any design measures to be installed shall be submitted to the CPUC for review and approval at least 60 days prior to initiation of construction. If there are no utilities identified with a corrosion potential, no alternating current interference study or mitigation is required.	The DEIR presumes that there are metallic pipelines parallel to the proposed 230 kV UG line. SCE should first be permitted to determine if there are affected utilities in the area that would warrant a corrosion study. Rather than conducting a study without a reasonable justification. The distance of 100 feet also seems arbitrary and would be unjustifiably burdensome.

D2-76

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Public Services and Utilities	**4.11-15**	**Operation and Maintenance** The 230-kV transmission line may cause corrosion on buried metallic pipelines that run parallel to the transmission line within the Alternative 1, 2, or 4 alignment. The rate of corrosion varies depending on the size and material of the pipeline. Impacts to utilities would be significant if induced current from the Revised Project exceeded the current density standards on parallel pipelines. The implementation of MM UTIL-03 if necessary would incorporate design features necessary for cathodic protection to reduce impacts associated with corrosion to buried pipelines. The impact would be less than significant with mitigation.	SCE suggests adding the words "if necessary" because at this point it is not clear whether or not there are any parallel metallic pipelines in the project area.	D2-77
Recreation	**4.12-2**	**Revised Project Setting** The Revised Project traverses a similar alignment as the FEIR 2013 route, but a portion of the route will impact trails and parks where the route has been relocated underground on 68th St and Pat's Ranch Road. ~~would be located adjacent to trails and parks~~ and ~~would traverse~~ underground a portion of a golf course.	SCE suggests providing additional information for clarification that some of the Revised Project locations and impacts are not significantly different than what was previously proposed and analyzed in the 2013 FEIR.	D2-78
Recreation	**4.12-14**	[General comment regarding Table 4.12-4 Revised Project Construction Impacts on Recreational Facilities]	The timeframes referenced in Table 4.12-4 Revised Project Construction Impacts on Recreational Facilities do not accurately reflect trenching work activities. Please refer to SCE data request responses to ED-SCE-05, Q. PD #1 and ED-SCE-07, Q. PD#2.	D2-79

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Recreation	**4.12-11**	When the threshold conditions described in CEQA Guidelines section 15162 have occurred, changes ~~Changes~~ to the Proposed Project or changes in baseline conditions that were not analyzed in the 2013 RTRP EIR require additional analysis to fully disclose potential impacts of the Revised Project.	Revisions are suggested to make the text consistent with CEQA Guidelines Section 15162.	D2-80
Recreation	**4.12-12**	Applicable EPEs are identified and mitigation is defined to avoid or reduce significant recreation impacts. The significance of the impact is ~~first~~ considered ~~prior to~~ after ~~application of~~ the effect of any EPEs is taken into account ~~and a significance determination is made. The implementation of EPEs is then considered when determining whether impacts would be significant and thus would require mitigation~~ Under CEQA, impacts remaining significant after consideration of any EPEs warrant mitigation where feasible. Mitigation measures included in the 2013 RTRP EIR, with modifications when appropriate, and/or additional new mitigation measures are identified to reduce significant impacts of the Revised Project.	EPEs are appropriately considered part of the proposed Project. Significance determinations should be made after the EPEs are taken into account, and mitigation measures should be imposed only if the impact remains significant after the EPEs are taken into account. To do otherwise is contrary to CEQA's fundamental premise regarding project descriptions, is confusing and provides a disincentive to applicants against the proposal of EPEs. To the extent this analytical change requires re-consideration of environmental impacts described in the DSEIR, SCE requests that such impacts be revised accordingly in the Final SEIR.	D2-81
Recreation	**4.12-13**	[General comment regarding scope and justification for Alternative 4]	The DSEIR states, "The relocation of the overhead 230-kV transmission line to the west side of Wineville Avenue would not result in any new or greater impacts than analyzed in the 2013 RTRP EIR. No further analysis of the change in location of the overhead alignment along Wineville Avenue is needed." Yet one of the alternatives considered is Alternative 4, which would require undergrounding along the same stretch of Wineville Avenue identified in this text. If there are no significant impacts associated with the shift of the line from the east to the west side of the road, it seems excessive to consider Alternative 4 (which prescribes undergrounding in this area). This inconsistency	D2-82

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

			warrants re-evaluation of Alternative 4 such that Alternative 4 should be dismissed as excessive and unnecessary.	D2-82
Recreation	**4.12-15**	[General comment regarding conclusions related to Recreation impacts and need for mitigation]	SCE suggests that the Final SEIR conclude that temporary closure, deterioration, and/or restriction of access to trails impacted by the undergrounding of SCE's proposed facilities would not rise to a significant impact, especially in light of the limited area of activity (*see* Figures 4.12-1 and 4.12-2).	D2-83
Recreation	**4.12-16**	MM REC-01 requires coordination with recreational facility owners. MM REC-01 also requires SCE, when feasible, to schedule the initiation of ground disturbing/undergrounding construction activity~~-es,~~ outside of the heavy recreational use periods (e.g., holidays or tournaments).	The golf course should be able to remain open and accessible for those portions unaffected by construction and where safe. SCE has already been reaching out to the golf course owner and will continue to discuss the options prior to construction.	D2-84
Recreation	**4.12-16**	SCE would implement EPE REC-03, ~~which requires revegetation of all trails affected by project construction, returning them to pre-construction conditions. While EPE REC-03 requires trail restoration to pre-construction conditions, a significant impact could still occur if the pre-construction condition was not adequately documented, resulting in inadequate restoration of the trail condition.~~but EPE REC-03 does not specify requirements for the restoration of trails. MM REC-04 requires that the pre-construction condition of trails is documented, and adequate repairs are made to any recreational facilities degraded by construction activities. ***Impacts on trails from construction activities would be less than significant with mitigation.***	SCE suggests edits to the text on page 4.12-16 to conform to the text on 4.12-15 regarding what EPE REC-03 requires. The relevant text on 4.12-15 says, "EPE REC-03 requires SCE to revegetate any park areas temporarily affected by project construction or return them to pre-construction conditions. Significant impacts on recreation would remain, however, as these EPEs do not include requirements for trail detours when feasible. EPE REC-03 does not specify requirements for the restoration of trails; potential damage to trails would remain a significant impact."	D2-85

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Recreation	**4.12-16**	**Goose Creek Golf Club** MM REC-04 requires SCE to prepare a Pre-Project Trail and Recreation Area Condition Report prior to construction that documents the condition of the golf course within the Revised Project work areas. SCE, in consultation with the golf club owner, will develop a restoration plan that shall ~~repair all damage to the golf course caused by construction vehicles and equipment~~ implemented by the completion of construction. SCE shall prepare a Post-Project Trail and Recreation Area Condition Report documenting the final state of the Goose Creek Golf Course within the Revised Project work areas.	The area identified for underground 230 kV construction is an area that is not actively maintained by the golf course. SCE has met with the Goose Creek Golf Course owner SCE expects to keep that dialogue with the golf course owner open in the hopes of reaching an agreement regarding final repair/landscape design without the constraint of re-creating the currently existing conditions, which may be inconsistent with the preferences expressed by the golf course owner.	D2-86
Recreation	**4.12-18**	[General comment regarding applicability of mitigation measures from 2013 Final EIR]	The DSEIR text references new or revised Mitigation Measures MM REC-01, MM REC-03, MM REC-04, and MM REC-05. For this section (and each of the other relevant sections where mitigation measures have been revised since the 2013 Final EIR), SCE suggests that the Final SEIR or MMRP explicitly clarify all relevant places where SCE is expected to comply with the 2013 Final EIR mitigation measures that are unchanged by the DSEIR.	D2-87
Recreation	**4.12-19**	**MM REC-03: Maintain Access to Trails.** Where feasible, SCE shall identify existing alternate routes to allow trail and path users to circumvent trail segments that are closed due to construction activities. If possible, trail ~~Trail~~ detours must be located on existing trails or unvegetated areas. Trail detours ~~and~~ shall not be located where they could impact sensitive biological resources. Trail detours may be placed when feasible and safe to do so along the perimeter of active work areas or through inactive work areas when it is safe to do so. SCE shall propose ~~Proposed~~ alternate routes ~~shall be~~ delineated on project plans and provided to the CPUC at least 30 days prior to construction for review and approval. Alternatively, if SCE identifies no feasible trail detours	It is possible that no trail detours on existing trails or un-vegetated areas are available. But SCE notes that any developed area that could be used as a substitute trail for this purpose would only be used as minimally as feasible if at all (the vast majority of the trail would likely remain unaffected), thus impacts would remain less than significant with mitigation.	D2-88

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		consistent with the preceding parameters, it shall inform the CPUC at least 30 days prior to construction.		D2-88
Recreation	**4-12-19**	**MM REC-04: Trail and Recreation Area Conditions and Repairs** SCE shall repair all damage to trails, detour routes, and recreation areas caused by construction vehicles and equipment ~~by the~~ within 30 days after completion of construction.	SCE suggests a short additional time to complete repairs should be afforded, particularly to ensure that damage from all construction work is completely accounted for when repairs are made.	D2-89
Recreation	**4-12-19**	**MM REC-04: Trail and Recreation Area Conditions and Repairs** SCE shall repair all damage to trails, detour routes, and recreation areas caused by construction vehicles and equipment within 30 days after ~~by~~ the completion of construction. SCE shall ~~prepare~~ a document ~~P~~post-Project ~~T~~trail conditions and ~~Recreation Area Condition Report documenting the~~ final state of all trails and recreation areas within the Revised Project work areas. The ~~Post-Project Trail and Recreation Area Condition Report~~ final documentation shall be submitted to the CPUC within ~~30~~ 60 days of completing construction in each project segment. SCE shall complete all trail and recreation area repairs to the approval of the appropriate land owner, land agency, or city. The Project will provide copies of the approval to the CPUC. ~~SCE shall restore all LWCF land to pre-existing conditions within 12 months from the start of construction.~~	The LWCF land already has certain requirements for repair for temporary damage within 12 months. Documentation of existing conditions, damages, and repairs will be discussed with the Hidden Valley Regional Park authorities, Goose Creek Golf Course owners, and City of Jurupa. SCE will provide documentation of those discussions and approvals with the CPUC. However, SCE believes that consent for the condition of post-project property approval should rest with the affected property owners/managers.	

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Transportation and Traffic	**4.13-40**	MM Trans-02 Applicable Locations: Construction of the ~~underground~~ 230-kV overhead transmission line construction ~~within Limonite Avenue.~~	This measure is duplicative to MM NOI-1. Although this measure appears similar to one of the Revised Project EPEs, the underlying reasoning behind the EPE was to minimize impacts to traffic during *overhead* activities as they crossed roadways. However, as written and if applied to underground activities, the mitigation measure would be unreasonable and would extend the overall construction duration by 40-50% assuming each work day is reduced to 7 hours. As a result, this requirement would extend the exposure of for the community to impacts such as traffic, noise, air quality, etc. by a corresponding duration.	D2-90
Transportation and Traffic	**4.13-40**	MM Trans-02a To minimize traffic congestion and delays during construction ~~and maintenance~~ of the underground 230-kV transmission line, SCE shall schedule all necessary road or lane closures or obstructions on all roadways associated with project construction ~~and maintenance~~ activities during off-peak periods. Road and lane closures shall be avoided during the 6:00 a.m. to 9:00 a.m. timeframe and the 3:30 to 6:30 p.m. timeframe, or as otherwise defined within CPUC and City-approved traffic control plans. Applicable Locations: Construction of the underground 230-kV transmission line	Occasional maintenance activities were deemed in the text to contribute only less-than-significant impacts for each impact criterion considered in the traffic analysis, so no mitigation should be required during project operations.	D2-91
Transportation and Traffic	**4.13-40**	[General comment regarding Mitigation Measure TRANS-04]	Mitigation Measure TRANS-04 should be deleted because MM Trans-08 already requires SCE to coordinate with Riverside Transit Authority to re-locate bus stops and/or re-route affected transit services via parallel streets during construction when affected transit service is subject to delays resulting from partial street closure or inaccessible transit stops due to full street closure. SCE acknowledges the	D2-92

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

			importance of keeping traffic lanes open where feasible, but given that other coordination with transit providers will also be taking place, this measure seems duplicative and inconsistent. (Tit. 14, Cal. Code Regs. § 15126.4, subd. (a)(4)(B); *Dolan v. City of Tigard*, 512 U.S. 374, 391 (1994).)	D2-92
Transportation and Traffic	**4.13- 41**	MM Trans-05 Prior to the start of construction, SCE shall ~~submit~~ prepare a Motorized and Non-Motorized Traffic Control Plans (TCPs) in coordination with ~~to~~ all agencies with jurisdiction (e.g., City of Jurupa Valley) over public roads that would be directly affected by construction activities (where road closures or encroachments would be necessary) ~~for review and approval at least 60 days~~ prior to commencing construction activities.	Mitigation Measure TRANS-05 is consistent with other projects and risks unnecessary delays from other agencies. SCE agrees that coordination with other agencies would be appropriate, but requiring participation in a formal approval process would seem excessive and unnecessary.	D2-93
Transportation and Traffic	**4.13-42**	SCE or its construction contractors shall provide the ability to ~~quickly~~ lay a temporary steel plate trench bridge upon property owner's request, ~~in order~~ to ensure reasonable driveway access to businesses and residences and shall provide continuous access to properties, along 68th St (between Wineville/Holmes and Lucretia), when not actively constructing the underground 230-kV transmission line.	First, the title of this mitigation measure is missing from page 4.13-41 (it may be TRANS-06). Regardless, there are only a few home owners along 68th St where underground construction would impact residents' only access. All other residents and businesses would have alternate access to their place or home during underground construction.	D2-94
Transportation and Traffic	**4.13-42**	**MM TRANS-07: Post-Construction Road and Sidewalk Repair** SCE shall conduct a pre-construction road and sidewalk condition assessment along roadways and sidewalks along the underground alignment and construction traffic routes, prior to construction. SCE shall submit the pre-construction road and sidewalk condition assessment to the CPUC and the City of Jurupa Valley no less than 30 days prior to construction. Following construction, SCE shall conduct a post-	SCE agrees that damages to roadways should be repaired to previous condition (or to a condition agreed upon by all involved), and proposes additional language to ensure documentation of the previous conditions so that mitigation repairs do not exceed the scope of impacts. As drafted in the DSEIR, Mitigation Measure TRANS-07 could leave SCE ratepayers vulnerable to bearing the cost of upgrading local roadways based on the increased use as a result of the cumulative impacts from unrelated urban and	D2-95

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

		construction road and sidewalk condition assessment along 68th Street, Pats Ranch Road, Limonite Avenue, Wineville Avenue, Cantu-Galleano Ranch Road, and Etiwanda Avenue. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites) and roadways where the road surface will be damaged by project-related trenching or digging, and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images. If damage to roads occurs as a result of project construction or construction traffic, SCE shall restore damaged roadways and sidewalk (e.g., asphalt, curbs, and gutters) within 60 days after the completion of construction ~~at their own expense under the direction of and to the construction standard of the City of Jurupa Valley to ensure that impacted roads are adequately repaired.~~ to a pre-construction condition, based on the pre-construction condition assessment, or to a condition agreed upon by SCE and the roadway owner.	commercial growth, which would not be roughly proportional to the impacts caused by the Revised Project. (Tit. 14, Cal. Code Regs. § 15126.4, subd. (a)(4)(B); *Dolan v. City of Tigard*, 512 U.S. 374, 391 (1994).) SCE agrees that damages to roadways should be repaired to previous condition (or to a condition agreed upon by all involved), and proposes additional language to ensure documentation of the previous conditions so that mitigation repairs do not exceed the scope of impacts.	D2-95
Transportation and Traffic	**4.13-43**	MM Trans-08 . . . ~~Following Construction: (1) Post signs 2 weeks prior to construction, at bus stops and pedestrian intersections that will be affected by closures and/or detours, (2) Notices will provide information regarding the duration of closure and detour/alternate routes, (3) Erect "share the road" signs within construction zones where partial closures will occur~~	SCE suggests revisions to this measure because posting signs notifying the public of construction after construction likely would confuse the public and would not appear to have any nexus to mitigating impacts associated with the Revised Project. (*See* Tit. 14, Cal. Code Regs. § 15126.4, subd. (a)(4)(A); *Nollan v. California Coastal Comm'n*, 483 U.S. 825, 834-837 (1987).)	D2-96
Transportation and Traffic	**4.13-45**	~~Error! Not a valid bookmark self-reference.Error! Reference source not found.~~ ...Table 4.13-16.	SCE assumes the erroneous text should have referenced Table 4.13-16.	D2-97

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

Transportation and Traffic	**4.13-46 – 4.13-81**	[General comment regarding the scope of traffic impacts from alternatives considered in the DSEIR]	This analysis of alternatives is misleading, as it does not take into consideration that each alternative would include not only all of its own underground elements, but also those of the Revised Project. Therefore, it cannot be assumed that impacts from the alternatives would be less than those of the Revised Project. The analysis should be revisited in light of this comment. Note that this comment would apply to the discussion of each impact and each of the four alternatives considered in the DSEIR.	D2-98
Transportation and Traffic	**4.13-46 – 4.13-81**	[General comment regarding the scope of traffic impacts from alternatives considered in the DSEIR]	The analysis of impacts on intersection operations from road closures should be revised to consider the longer duration and combined impacts from the underground alternatives. For example, impacts from Alternatives 1 and 2 would have greater traffic impacts than the Revised Project. These alternatives would also include the underground portions of the Revised Project, and only evaluating them in part is misleading. This leads the reader to believe these alternatives would lead to fewer roadway closures than the revised project, when in fact they would not.	D2-99
Cumulative Impacts	**5-13**	[General comment regarding sources of information related to cumulative impacts]	The DSEIR lists several land use planning documents and projections as sources of information regarding potential cumulative projects used in the cumulative impacts analysis. However, it appears to overlook other plans, including Specific Plan 266 - I-15 Corridor. The Final SEIR should clarify how the various planning documents and projections were considered in this cumulative impact analysis, and explain why others were omitted.	D2-100
Comparison of Alternatives	**6-8**	[General comment regarding rankings of alternatives]	In Table 6.4-2: Comparison of Revised Project and Alternative 1 Significant and Unavoidable Impacts within the Area of Comparison, the comparison of the	D2-101

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

			Revised Project and Alternative 1 rankings omitted some CEQA impacts that would be greater with Alternative 1, *e.g.*, recreation, air quality, hazards, hydrology, public services, and cultural resources. These omissions necessarily impact the rankings of Alternative 1 and the Revised Project, and consequently the identification of the environmentally superior alternative. The same comment would generally apply to each of the tables and the text comparing the other alternatives to the Revised Project as well.	D2-101
Comparison of Alternatives	**6-6 – 6-26**	[General comment regarding the need to account for planned developments in the comparison of impacts]	The comparison of aesthetic impacts associated with each alternative against the Revised Project is skewed for aesthetics and agriculture in particular because it does not account for development of the area as planned in Jurupa Valley General Plan and as permitted by local zoning, including as High Density Residential or Commercial Retail even if RTRP facilities were underground in the area. These anticipated land uses would themselves affect aesthetics and agricultural uses in the area, thus comparatively reducing the impacts from the Revised Project alone.	D2-102
Comparison of Alternatives	**6-19**	[General comment regarding relative importance of impacts considered in the comparative analysis]	The comparison of alternatives is incomplete. There are impacts to Air, Recreation, Cultural Resources, etc. that were not ranked and discussed. Additionally, the table assumes impacts between alternatives are equal in the ranking, whereas they are greater for some alternatives than for the Revised Project. The only impact for which the Revised Project earned a "5" (the lowest ranking) was for aesthetics, but that ignores the improvements associated with the Revised Project and given the ongoing and anticipated further development of the Revised Project area by a number	D2-103

Southern California Edison Company's Comment Table On The Draft Subsequent EIR for RTRP

			of land uses that would themselves impact visual quality and aesthetics in the area.	D2-103

3.5.2 Response to Letter D2: SCE

D2-1 The Subsequent EIR, Section 2.2: Revised Project Components of the Draft Subsequent EIR, provides details regarding the location and length of the Revised Project overhead and underground segments. SCE's proposed language regarding the underground line is ambiguous and suggests the new underground 230-kV double-circuit transmission line would be located in the same location as the 2013 proposed alignment. The proposed language is not necessary to clarify or correct the Final Subsequent EIR. No modification of the Subsequent EIR is necessary.

D2-2 The first footnote under Section 2.1: Introduction has been modified in response to this comment as follows:

> SCE proposes ~~two~~ double-circuit transmission lines that would be attached to the same set of overhead ~~pole~~ structures, but placed in separate underground duct banks. For the purpose of this Subsequent EIR, the reference is hereafter simplified to "line" (singular). Both lines will be addressed when additional description is warranted.

D2-3 GIS data submitted by SCE in Data Request #6 indicates that tower JD22 would be 128 feet tall and tower JD9A would be 120 feet tall. Pole and tower heights may change as SCE continues to refine the engineering design.
Section 2.2: Revised Project Components Table 2.2-1 has been modified to reflect SCE's new estimation of transmission structure heights in response to this comment as follows:

Structure	Number	Description	Revised Project Change
Overhead 230-kV Transmission Line (Wineville Avenue and along I-15)			
Lattice Steel Tower (LST)	3	Double-circuit galvanized LSTs with I-string insulators. LSTs would be ~~115 feet and 120 feet tall.~~ approximately 120 feet tall.	The proposed 2013 alignment included two LSTs on the east side of Wineville Avenue. The overhead alignment is now proposed on the west side of Wineville Avenue. The 2013 project included a TSP along I-15 where LST JD9A is now proposed, immediately north of the riser poles at Limonite Avenue.
Tubular Steel Pole (TSP)	2	Double-circuit galvanized TSPs with I-string insulators. TSPs would be ~~90 feet and 170 feet tall.~~ approximately 120 feet tall.	The proposed 2013 alignment included two TSPs on the east side of Wineville Avenue. The overhead alignment is now proposed on the west side of Wineville Avenue on two TSPs.

Table 2.2-1 has been revised according to the request to remove the repeated information regarding vaults.

The suggested change to the title of Table 2.2-1 and supplemental information that SCE also provided in this comment does not provide additional information pertinent to the review of the Revised Project. No modification of the Subsequent EIR is necessary.

D2-4 The comment and suggestions are noted. The Subsequent EIR identifies the location of the overhead Revised Project components under the heading "Location" on page 2-3 of the Project Description. The rationale behind the changes to the project design was an important factor in determining that a Subsequent EIR was necessary, as described in MR-1. The history and reasoning for this decision was described in detail in the Initial Study Checklist, Appendix B. Chapter 1: Introduction also provides the project background, which includes the rationale for the subsequent review of the Revised Project. The intent of the Project Description is to describe what is currently proposed in the Revised Project, not to describe the reasoning for the Revised Project itself.

D2-5 Footnote "2" is deleted from Section 2.2: Revised Project Components in the Final Subsequent EIR.

D2-6 The suggested edits are confusing and are not incorporated because they imply SCE will be replacing structures that do not exist. SCE is not proposing to remove structures that were proposed in the certified 2013 RTRP EIR. The proposed 2013 alignment analyzed in the certified 2013 RTRP EIR was not approved or permitted by the CPUC and is no longer proposed by SCE. As such, the segments of the proposed 2013 project that are "replaced" by the Revised Project do not need to be included in the Project Description. No revisions are necessary.

D2-7 The proposed distribution line changes (represented by the Revised Project) are presented in Table 2.2-2 of the Project Description. The table identifies the 2013 proposed actions and Revised Project proposed actions at Distribution Line Relocations #3, #5, #7, and #8. All four distribution line relocations were identified in the Initial Study Checklist as part of the Revised Project; however, additional data provided by SCE subsequent to the publication of the Initial Study Checklist allowed the CPUC to determine that Distribution Line Relocations #3 and #5 would not have a greater impact than the actions analyzed in the certified 2013 RTRP EIR. Table 2.2-2 of the Subsequent EIR is necessary to inform the reader as to why Distribution Line Relocations #3 and #5 are not included in the Subsequent EIR environmental analysis.

The certified 2013 RTRP EIR analyzed the relocation of existing distribution facilities. SCE has modified the design for several relocations since the 2013 RTRP EIR was certified. The CPUC published the NOP and Initial Study Checklist in January 2017 and identified four Distribution Line Relocations that

would require additional analysis in the Subsequent EIR, based on information SCE had submitted to the CPUC at that time. SCE provided additional information regarding Distribution Line Relocations in response to Data Request #1 Question 19, which allowed the CPUC to determine that the currently-proposed actions for Distribution Line Relocations #3 and #5 would not cause greater impact than the activities analyzed in the certified 2013 RTRP EIR. The analysis of the Revised Project includes project elements with the potential to cause new or greater impacts than impacts described in the certified 2013 RTRP EIR. The CPUC did not re-analyze the project elements that were adequately analyzed in the certified 2013 RTRP EIR.

Distribution Line Relocations #3 and #5 are not visible from any of the KOPs analyzed in the Subsequent EIR. No change to the existing conditions would occur as a result of the Revised Project at Distribution Line Relocation #5. No additional analysis is required in Section 4.1: Aesthetics.

D2-8 The Draft Subsequent EIR is revised in Section 2.4.2: Transmission Riser Pole Installation, first paragraph, to show the distance between riser poles as SCE currently proposes, as follows:

> Riser poles would be spaced approximately ~~150~~ 80 feet apart.

D2-9 Section 2.4.3: Underground Transmission Duct Bank Construction, first paragraph, is modified to include the following edit to indicate that soil will be backfilled and repurposed as much as possible before being transported for disposal:

> The excess excavated soil would be trucked to a locally permitted landfill for disposal.

D2-10 Manholes would be required at street level to access the vaults. The Revised Project involves the installation of underground vaults as well as the manholes that would be used to access the vaults throughout operation of the project. No change to the Subsequent EIR is necessary.

D2-11 The dimension for manholes was identified based on information submitted by SCE in response to Data Request #9. Manholes would be required to access the underground telecommunication facilities. No change to the Subsequent EIR is required.

D2-12 Section 2.4.3: Underground Transmission Duct Bank Construction includes the following edit in footnote "4":

> A cable pull is the action of pulling the ~~conductor~~ cable between underground vaults on the same circuit. Vaults are spaced approximately 1,500 feet apart.

D2-13 Section 2.4.8: Site Cleanup and Waste Disposal, second paragraph, is revised to clarify waste material management as follows:

> Waste materials that can be recycled and salvaged would be gathered by construction crews ~~and separated into roll-off boxes. Salvageable items (e.g., conductor, steel, and hardware) would be transported to the marshalling yards, sorted, baled, and then sold through available markets~~. Items that may be recycled include: nuts, bolts, washers, and other small hardware; conductor wire; and larger hardware (shackles, clevises, yoke plates, links, or other connectors used to support the conductor).

D2-14 Section 2.4.11: Preliminary Construction Schedule now includes the appropriate reference.

D2-15 Section 2.4.11: Preliminary Construction Schedule, second paragraph, is modified to include this clarification regarding vaults and other materials, as follows:

> ~~All~~ Except for vaults, materials associated with construction efforts would be delivered by truck to established marshalling yards. Vaults may be directly delivered from manufacturers' facilities to their planned installation locations.

D2-16 Section 2.5.1: Underground Transmission, first paragraph, is modified as requested:

> The underground vaults would be routinely inspected to ensure structural integrity of the ~~conductor~~ cable system and vaults.

D2-17 The CPUC recognizes the reduction of land use conflicts as a result of relocating the overhead transmission line from the east side to the west side of Wineville Avenue; however, the impact of the overhead 230-kV transmission line has been analyzed in the Subsequent EIR in accordance with CEQA Guidelines. Section 15162(a) of the CEQA Guidelines states that a Subsequent EIR should be prepared when substantial changes are proposed to a project, or when substantial changes have occurred with respect to the circumstances under which the project is being undertaken. Construction of residential communities along Wineville Avenue constitute a change in circumstances and additional analysis of the overhead transmission line is required.

The impact of the Wineville Avenue transmission line structures on visual quality would be significant due to the viewer sensitivity and close proximity to the new residential community east of Wineville Avenue. The view from residential streets was determined to be significant and unavoidable; therefore, alternatives to the Revised Project were considered to avoid the aesthetic impact. No change to the Subsequent EIR is required.

D2-18 Refer to response D1-8. Impacts on agricultural land is analyzed as an impact of the Revised Project because the project would convert Important Farmland that is now actively cultivated for farming purposes. If the land is converted prior to construction of the Revised Project, then mitigation for impacts to farmland would not be required.

D2-19 The CPUC acknowledges that final engineering has not been completed for the Revised Project nor any of the alternatives. Pats Ranch Road had not been completely constructed between Limonite Avenue and Bellegrave Avenue at the time the NOP was issued. The CPUC consulted with the Jurupa Community Services District to obtain records of the utilities that have been constructed within the streets that would be utilized by the Revised Project or the alternatives. The CPUC's transmission engineering consultant reviewed the dimensions and set-back requirements of the underground double-circuit transmission line duct banks and vaults, as well as the location of known existing utilities. Sufficient space is available in the existing and future roadway to construct the underground 230-kV transmission line within Pats Ranch Road between Limonite Avenue and Bellegrave Avenue, as stated in response D1-17 (Williams, 2018). In fact, Pats Ranch Road north of Limonite Avenue has substantially more space available for the underground transmission line than the proposed Revised Project segment on Pats Ranch Road south of Limonite Avenue.

Existing water and sewer service lines likely connect to the developments constructed to the east of Pats Ranch Road. Final engineering of the Alternative 1 underground 230-kV transmission line, if selected by the CPUC, would need to be engineered with consideration for the existing and planned utilities and avoid conflicts with these utilities by constructing the transmission line under or around existing utilities.

The commenter's requested revision removes information that is accurate, based on CPUC's analysis, and pertinent to the reasoning behind why Alternative 1 is feasible. The following sentence is added to Section 3.5.1: Overview, fourth paragraph, and to Appendix D to reflect the fact that SCE has not completed final engineering for the alternatives:

> Information presented is based on preliminary engineering, as final engineering has not been completed for the alternatives.

D2-20 As stated in response D2-19, the CPUC consulted with the Jurupa Community Services District and obtained records of utilities within the streets that would be used by the Revised Project and alternatives. Wineville Avenue is approximately 70 feet wide. Water, sewer, and gas lines exist in Wineville Avenue. The CPUC's transmission engineering consultant reviewed the records of existing utilities and the necessary space requirements for the underground transmission line and

concluded there is sufficient space to construct Alternative 2 (Williams, 2018). Final engineering of the Revised Project or any alternative selected by the CPUC would need to consider all existing utilities and design the transmission line to avoid conflicts with those utilities by constructing under or around the utility conflicts.

Text in Section 3.5.3: Alternative 2: Wineville – Limonite Underground, second paragraph, has been modified per SCE comments on construction noise impacts as follows:

> ~~The a~~Alternative 2 may result in additional construction noise, traffic impacts, increased air pollutant emissions, and greater potential for induced current effects (i.e., shock hazard, corrosion of adjacent buried utilities).

D2-21 Text in Section 3.5.5: Alternative 4: Wineville – Landon Underground, second paragraph, has been modified per SCE comments on construction noise impacts as follows:

> ~~The a~~Alternative 4 may result in additional construction noise, traffic impacts, increased air pollutant emissions, and greater potential for induced current effects (i.e., shock hazard, corrosion of adjacent buried utilities).

D2-22 Impacts on visual quality from grading are accurately attributed to the Revised Project, or alternatives, whether or not other ongoing activities may periodically remove vegetation. Mitigation requiring revegetation is applicable and is consistent with previous mitigation measures included in the certified 2013 RTRP EIR. The riser pole and related underground vault facilities would require ground disturbance and grading modifications. It is assumed that these areas would be excluded from ongoing agricultural activities for security. Disturbed areas must be revegetated regardless of nearby agricultural activities. Agricultural plantings on these lands, if consistent with project operations, could be considered a form of revegetation.

D2-23 The aesthetic impact analysis is based solely on the current project description for the Revised Project in comparison to existing baseline conditions. The facilities proposed in the certified 2013 RTRP EIR, and subsequently changed, are not considered in the analysis because the previously proposed facilities were not constructed and are not part of the baseline conditions. Response D2-7 provides further justification of this approach to analysis. No modifications to the Draft Subsequent EIR are necessary.

D2-24 Viewer sensitivity is determined by considering the types and numbers of potential viewers of a specified area, the level of public interest, adjacent land uses, and the presence of special natural or cultural resource areas. Viewer

sensitivity at Vernola Park is high because park users often visit parks for their visual sense of open space, views of distant mountains, and contrast from surrounding developed areas. As presented in KOP 4 simulations, the exposure to the overhead infrastructure is high because it would be seen in open views from the south side of the park's perimeter pedestrian trail. Based on the guidelines presented in Table 4.1-6, the conclusion of significance is appropriate.

D2-25 The third paragraph under *Views from Parks and Recreation Areas (KOPs 4, 7, and 8)* has been revised in accordance with SCE's comment as follows:

> An overhead ~~115~~ 66-kV transmission line exists within the golf course, but the riser poles of the Revised Project are substantially larger than the TSPs that support the existing ~~115~~ 66-kV transmission line.

D2-26 The intent of the mitigation is to provide vegetation to render the area as it appears visually prior to the project. The types of vegetation within construction areas vary and may include non-native vegetation; therefore, the language has been revised to more accurately convey the intent of the measure. All temporarily-disturbed non-native vegetation shall be restored with native vegetation according to the revised MM AES-01. All temporarily-disturbed agricultural lands shall be restored in accordance with MM AGR-01.

The project would not be considered complete until all mitigation measure requirements are fulfilled, including restoration of temporarily-disturbed areas, to pre-construction conditions as specified in MM AES-01. The following revisions are made to Section 4.1.9: Revised Project Mitigation Measures MM AES-01:

> ~~Revegetation~~ Planting will be used, where appropriate (revegetation in certain areas is not possible due to vegetation management requirements related to fire safety) to re-establish a ~~natural-appearing~~ vegetated landscape and reduce potential visual contrast between disturbed areas and the surrounding landscape. Temporarily disturbed agricultural lands shall be restored in accordance with MM AGR-01. Temporarily disturbed non-native vegetation shall be restored with native vegetation. 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.

D2-27 The comment is correct that an analysis of light and glare impacts is included for the alternatives. The following revisions have been made to the Impacts Avoided

by the Alternatives under Section 4.1.11: Alternatives Impact Analysis in accordance with the following comment:

> Alternatives 1 through 4 would be constructed in the same general project area as the revised project and would have no impact on ~~three~~ two CEQA Appendix G significance criteria:
>
> a. Have a substantial adverse effect on a scenic vista
> b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway
> ~~d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area~~
>
> None of the alternatives are located near a scenic vista and there are no designated scenic highways in the project vicinity. ~~None of the alternatives would create a new source of daytime glare or nighttime lighting because the transmission line would be placed underground and construction would occur during the day. The riser poles would be the only aboveground component of the retained alternatives. Riser poles would be constructed using galvanized steel treated to reduce glare.~~ Aesthetics impacts associated with these significance criteria are not discussed further.

D2-28 Refer to response to comment D2-26. Viewer sensitivity is high in the park. Alternative 3 structures would be located in the middleground, similar to the Revised Project. The view of the Revised Project structures is depicted in simulations from KOP 4. The simulations show that the riser poles, LST, and TSPs would be openly visible and skylined against the mountain backdrop. The purpose of the simulation is to allow the decision-makers the ability to draw their own conclusions as well as to inform those of the aesthetics analysis. Refer to response D2-24 above.

D2-29 The referenced figure captions on p. 4.1-62 and 4.1-63 are revised as suggested:

Figure 3.5-1 KOP 3 – Baseline Photograph – ~~Vernola Park~~ Rosebud Lane Looking ~~Southwest~~ West

Figure 3.5-2 KOP 3 – Photosimulation (After Alternative 4) – ~~Vernola Park~~ Rosebud Lane Looking ~~Southwest~~ West

D2–30 Response D1-8 details the current conditions and why impacts on agricultural land were analyzed instead of a future condition, when the land is developed. Timing of cumulative project construction activities in the area east of I-15 is not yet known.

The commenter fails to provide evidence to substantiate the assertion that use conversion will occur prior to or immediately after the construction of the

Revised Project. Substantial delays in conversion from prime farmland to commercial and residential uses are possible. In this situation, failure to restore existing prime farm land (which is the current use at time of writing) would result in significant loss of use, irrespective of future anticipated uses. MM AGR-01 is therefore appropriately applied to ensure existing agricultural uses can be retained until such time that conversion to commercial or residential uses occurs, and to reduce impacts to less than significant.

D2-31 As stated in the analysis in Section 4.2: Agriculture and Forestry Resources, impacts on important farmland from construction of Distribution Line Relocation #8 would be less than significant because "the City of Riverside's prior zoning designates the land at Distribution Line Relocation #8 for nonagricultural uses." The significant impact on farmland does not apply to Distribution Line Relocation #8 and therefore no mitigation is required. No change or modification to the document is therefore required.

Impacts on important farmland within the City of Jurupa Valley would be significant, unlike impacts in the City of Riverside, because the land is actively used for agricultural cultivation and the zoning designations do not restrict agricultural land uses.

D2-32 The phrase "**Bold** values exceed applicable standard" in the note of Table 4.3-4, in Section 4.3.3: Environmental Setting, has been deleted.

D2-33 This text is in reference to simultaneous construction activities. The preliminary engineering clearly shows work areas overlap. Minor revisions were made to the language in Chapter 2: Project Description and Section 4.3: Air Quality and Greenhouse Gas Emissions to clarify that the text was referring to temporal and spatial overlaps. This assumption is based on an understanding of construction techniques used for other underground transmission line projects, such as the Sycamore-Peñasquitos 230-kV Transmission Line Project.

The text in Chapter 2: Project Description, Section 2.4.5: Temporary Work Area, paragraph four, is revised as follows:

> No other construction activity could occur within the transmission vault work area at the same time, due to space and safety constraints.

The text in Section 4.3: Air Quality and Greenhouse Gas Emissions, Section 4.3.7: Project Impact Analysis, paragraph 11, is revised as follows:

> No other construction activity could ~~occur within~~ overlap with this work area at the same time, due to space and safety constraints. Although several construction activities could occur simultaneously they would not occur in the same area as one another.

D2-34 The suggested revision was made to the text in Section 4.3: Air Quality and Greenhouse Gas Emissions, Section 4.3.7: Project Impact Analysis, paragraph 23, as follows:

> The Proposed Project would contribute to the existing air quality violations by emitting ozone precursors (NOx ~~and ROG~~) and particulate matter in excess of the SCAQMD significance thresholds.

D2-35 The missing text has been added into Section 4.3 Air Quality and Greenhouse Gas Emissions, Section 4.3.7: Project Impact Analysis, paragraph 43, as follows:

> The closest sensitive receptors to underground construction of the 230-kV transmission line, located approximately 30 feet away, would experience the highest ambient pollutant concentrations. Ambient concentrations of PM_{10} at the closest residence to overhead construction activities also would exceed the significance threshold, as shown in Table 4.3-17; however, due to the types of activities and distance, concentrations would be approximately half of the concentrations estimated to occur near underground construction activities.

D2-36 Each fugitive dust control measure has a particulate matter control efficiency identified, based on studies conducted and in accordance with accepted SCAQMD methodologies (SCAQMD, 2007; Western Governors' Association, 2006; SJVAPCD, 2007). The list of fugitive dust control measures identified in MM AQ-01, was formulated from standard measures available to minimize fugitive dust on a construction site. The combination of fugitive dust control measures identified in MM AQ-01 result in a total fugitive dust control efficiency of 75 percent, which is necessary to reduce fugitive dust to below SCAQMD significance thresholds. Eliminating the requested fugitive dust control measures would reduce the overall fugitive dust control efficiency of 75 percent that was applied to emissions generated by the Proposed Project. The recommended fugitive dust control measures are included in MM AQ-01. The recommended measures would not be adequate to avoid exceeding SCAQMD thresholds and a significant impact. The fugitive dust control measures suggested for removal were not deleted.

D2-37 Refer to response D1-16 for a detailed response and summary of changes to MM AQ-03.

D2-38 The measures identified in MM AQ-02 were incorporated from the certified 2013 RTRP EIR and are designed to limit or eliminate idling of vehicles and associated air pollutant emissions. Due to the similarity between the measure in MM AQ-02 requiring use of temporary traffic controls, and MM TRANS-06 requiring use of flaggers and/or signage, this measure has been removed, as shown below. The two other control measures identified by the commenter regarding turn lanes

and construction traffic routes were not removed as these are not specifically identified in any other mitigation measure.

D2-39 The requested language was added to Section 4.3.8: Revised Project Mitigation Measures MM AQ-02 with modifications requiring a due diligence search prior to use of off-road equipment not meeting Tier 4 emissions standards and submittal of calculation evidence to CPUC proving that emissions do not exceed SCAQMD significance thresholds. SCAQMD identified a minor error in MM AQ-02 and requested that Model Year 2010 diesel trucks in excess of 14,001 pounds comply with the Truck and Bus Regulations. The revisions requested by SCAQMD were incorporated into MM AQ-02 as noted further in responses A11-4 and A11-5.

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

D2-40 The statement in the Subsequent EIR that none of the alternatives would have an impact related to, conflicting with, or obstructing implementation of the applicable air quality plan was erroneous. Impacts related to implementation of applicable air quality plans are analyzed for Alternatives 1 through 4 in the Subsequent EIR. The following text in Section 4.3.10: Alternatives Impact Analysis, paragraphs two and four, was revised for clarification as follows:

> Alternatives 1 through 4 would be constructed in the same general area as the Proposed Project. ~~All alternatives would have no impact on the following Appendix G significance criterion related to Air Quality:~~
>
> ~~a. Conflict with or obstruct implementation of the applicable air quality plan~~

Alternatives 1 through 4 would have no impact on the following Appendix G significance criterion related to Greenhouse Gas Emissions:

> b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases
>
> ~~None of the alternatives would conflict with or obstruct the implementation of an air quality plan because the alternatives would not induce population or employment growth within the SCAB or conflict with adopted area source rules.~~ The alternatives would not conflict with the CARB Climate Change Scoping Plan or other local GHG reduction plans because construction vehicles are legally required to comply with applicable GHG reduction programs. Impacts associated with ~~these~~ this significance ~~criteria~~ criterion are not discussed further.

D2-41 The criteria pollutant emissions calculations account for material delivery trucks and worker vehicles. MM AQ-04 is intended to reduce emissions associated with construction of alternatives to levels at or below those of the Proposed Project. As shown in Table 4.3-12, PM_{10} emissions are close to the SCAQMD significance

threshold. Revisions to MM AQ-04 in Section 4.3.11: Mitigation Measures for Alternatives, have been made to clearly account for worker vehicles and rectify minor errors. Text is also added to MM AQ-04 to allow a greater number of vehicles/equipment if calculation evidence proves emissions do not exceed SCAQMD significance thresholds as follows:

MM AQ-04: Limitation of Daily Construction Vehicles and Equipment Use

The following equipment limitations apply to the identified construction activities:

- Vault Installation
  - No more than ~~39~~ 38 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 20 worker vehicles, in any one day
- Duct Bank Installation
  - No more than ~~31~~ 30 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 20 worker vehicles, in any one day
- Underground Cable Installation
  - No more than 7 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 10 worker vehicles, in any one day
- Cable Terminating
  - No more than 5 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 8 worker vehicles, in any one day
- Cable Splicing
  - No more than 8 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 16 worker vehicles, in any one day
- Jack and Bore (trenchless)
  - No more than 12 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, in any one day

Alternatively, SCE may be allowed to have a greater number of vehicles/equipment operating on an active work site if SCE provides calculation evidence that the larger number of vehicles/equipment do not exceed SCAQMD significance thresholds. Circumstances where this may be applicable include cases where SCE will use smaller vehicles/equipment than originally included in the calculations. The calculation evidence shall be provided to the CPUC at least 2 weeks prior to initiation of the overlapping construction activities.

Applicable Locations: Construction of Alternatives 1, 2, 3, and 4 in combination with the Proposed Project

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 construction
- **During Construction:** Monitor the maximum number of vehicles and equipment used in any one day for five construction activities; Vault Installation, Duct Bank Installation, Underground Cable Installation, Cable Terminating, ~~and~~ Cable Splicing, and Jack and Bore
- **Following Construction:** N/A

D2-42 Refer to response D1-15 for an explanation of why the significance prior to and after application of EPEs was considered.

D2-43 All significance conclusions identified in Table 4.4-9 are based on the impacts of the Revised Project only. CEQA requires the analysis in an EIR to consider the change from baseline conditions and does not require a comparative analysis of a

previously proposed or revised project. The scope of the Revised Project and reason for further environmental analysis is clearly identified in MR-2. The analysis specifically identifies elements of the Revised Project that would impact biological resources. The Subsequent EIR only evaluates the changed components of the Proposed Project analyzed in the certified 2013 RTRP EIR or the effects related to changed circumstances.

D2-44 Comment noted. MM BIO-09A in Section 4.4.9: Revised Project Mitigation Measures, has been clarified as follows:

> To support invasive species management, SCE shall prepare and implement a comprehensive Weed Control Plan for invasive, non-native species abatement. Developed land shall be excluded from weed control. The Weed Control Plan shall include specific weed abatement methods, practices, and treatment timing developed specifically for the Revised Project area by qualified individuals with at least 5 years of weed control experience within Riverside, Los Angeles, and San Bernardino Counties ~~County~~.

D2-45 MM CUL-02: Archaeological Monitoring is carried over from the certified 2013 RTRP EIR. This mitigation measure applies to all Proposed Project work areas where ground disturbance occurs. This measure is intended to protect previously unidentified cultural resources and unknown components of previously identified cultural resources. It is possible that cultural resources could be located beyond 50 feet of the known cultural resource. The 50-foot limit proposed by SCE may not be adequate to protect resources is not incorporated. No edits to the mitigation measure are necessary.

D2-46 Construction of the underground 230-kV transmission line is not the only source of ground disturbance. The construction of overhead transmission line structures would cause ground disturbance as well. To ensure that MM CUL-02A reduces the impacts, monitoring must apply to all ground-disturbing activities, not just to construction of the underground 230-kV transmission line. Refer to response D2-45 for why the suggestion to add a 50-foot restriction is rejected.

D2-47 SCE's comments suggested edits to MM CUL-02B: Cultural Resources Monitoring, Evaluation, and Treatment of Resources. The CPUC incorporated some but not all changes suggested by SCE. Explanations are provided below where changes were not incorporated.

1. The monitors are not directing construction crews where to work. Monitors shall halt crews in areas where resources are located and, if necessary, request the equipment be moved away from the resource location to make sure there is enough space to evaluate the resource. The suggested edits were incorporated with minor revisions.

2. Tribal monitoring locations should be determined by the relevant tribes. Monitoring areas must be defined in the Cultural Resources Monitoring and Treatment Plan (CRMTP) prior to construction, in consultation with the tribes, CPUC, and SCE. When the Final Subsequent EIR is published, the CRMTP will not have been prepared. The intent of this measure is to define the components and required information that must be included in the CRMTP in order to ensure that impacts are mitigated to a less-than-significant level. SCE's suggested edits were not incorporated.
3. The CPUC consulted with the tribes regarding the mitigation measures and tribal monitoring. The CPUC declines to make the suggested revisions to the Tribal Cultural Monitor portion of MM CUL-02B.
4. Cultural resource monitoring shall be conducted during all ground-disturbing activities to protect all known resources, unknown components of known resources, and previously undiscovered resources. Narrowing down the monitoring areas within 50 feet of known cultural resources is not standard, and may not be protective of previously undiscovered resources. Additionally, the construction of overhead transmission line towers and poles would involve ground-disturbing activities, which would require monitoring as well. Thus, cultural resource monitoring shall be conducted during all ground-disturbing activities to ensure no impacts occur to previously unidentified resources.
5. The identification of total avoidance as the preferred method of mitigation in the CRMTP was determined based on the preferred method identified in the CEQA Guidelines and concurred by consulting tribes. MM CUL-02B was not modified to reflect this comment.

MM CUL-02B in Section 4.5.9: Revised Project Mitigation Measures, is revised as follows:

> *Qualified Archaeological Monitors…*
> If unanticipated cultural resources are discovered, ~~T~~the archaeological monitor(s) shall be empowered to ~~temporarily halt~~ initiate a temporary halt to construction activity or divert grading equipment to allow recording and removal of the unearthed resources if the discovery is located in an active construction area. ~~C~~Construction shall not continue in the area until the resources are evaluated and the appropriate next steps are determined by the archaeological monitor, in consultation with the Project archaeologist.

Tribal Cultural Monitor. SCE shall retain a tribal cultural monitor(s) from consulting tribes (i.e., Pechanga Band of Luiseño Indians and Gabrieleño Band of Mission Indians–Kizh Nation). The tribal cultural monitor(s) shall monitor all ground-disturbing activities that the consulting tribes believe warrant monitoring, represent tribal concerns, and communicate necessary information with their respective tribal councils. If construction activities require tribal cultural monitors from multiple tribes, SCE shall coordinate a revolving schedule between the consulting tribes. SCE shall provide the documentation of coordination and a fully executed Cultural Resources Monitoring and Treatment Agreement with the monitoring tribe(s) outreach efforts and the name and credentials of the proposed Native American monitor(s) to the CPUC for approval at least 14 days prior to construction. The Tribes shall be given the opportunity to consult with the qualified archaeologist and provide input on the draft CRMTP during its preparation, including the Evaluation Plan and Data Recovery Plan. Upon completion of the draft CRMTP, the consulting tribes shall be given at least 30 days to provide input on the draft CRMTP. Evidence of consultation with the Tribes shall be submitted to the CPUC. The tribal cultural monitor(s) shall inform the archaeological monitor if any previously undiscovered tribal cultural resources are discovered. The archaeological monitor shall be granted the authority to temporarily halt ~~and redirect~~ grading in the immediate area of a find in order to evaluate the find and determine the appropriate next steps, in consultation with the Project archaeologist.

Cultural Resource Monitoring

- The purpose of cultural resource monitoring is to ensure proper implementation of all avoidance procedures so that cultural resources, if present, are not irretrievably lost, damaged, destroyed, or otherwise adversely affected. Cultural resource monitoring shall be conducted during all ground-disturbing activities (i.e., vegetation clearing, excavation, grading, and staging area/marshalling yard preparation within unpaved yards). The requirements for archaeological and tribal cultural monitoring shall be noted on ~~construction plans and~~ the worker environmental awareness training handouts. Monitors shall cease monitoring if older quaternary alluvium soils and/or bedrock is encountered.
- Monitoring teams shall work under the direct supervision of the Qualified Archaeologist in conjunction with a tribal cultural monitor. The Qualified Archaeologist and tribal cultural monitor shall attend preconstruction meetings for the project. Monitoring teams shall include one qualified archaeological monitor and one tribal cultural

monitor. In the event that ground-disturbing activities occur simultaneously in multiple locations requiring monitoring, a monitoring team shall be required at each location.
…

- **Environmentally Sensitive Areas (ESA) Delineation.** The CRMTP shall describe how historical resources eligible or potentially eligible for listing in the California Register of Historic Resources (CRHR), significant archaeological resources, and tribal cultural resources deemed significant by the tribe(s) (collectively referred to as "significant resources") will be delineated and avoided as ESAs during construction. ESAs containing cultural resources shall not be identified ~~on the ground or~~ on maps to be used by anyone other than the Qualified Archaeologist, archaeological monitors, and tribal cultural monitors. They shall be labeled on maps that would be used by the Qualified Archaeologist, archaeological monitors, and tribal cultural monitors, and with signage in the field as "environmentally sensitive areas." The sole preferred method of mitigation in the CRMTP for known significant resources shall be total avoidance of the resource (preservation in place), per CEQA Guidelines Section l 5126.4(b)(3)(A). The preferred method of mitigation in the CRMTP for unanticipated resources shall be total avoidance (preservation in place). If avoidance is determined to be infeasible by the CPUC, the Qualified Archaeologist, in consultation with CPUC, SCE, and consulting tribe(s), shall prepare an Evaluation Plan and Data Recovery Plan.

D2-48 The Worker Environmental Awareness Program (WEAP) training that would be conducted as part of SCE's EPE HAZ-02 does not specify the specific requirements necessary to ensure that impacts to cultural, tribal cultural, and paleontological resources remain less than significant. The details in MM CUL-02C are necessary to layout the specific cultural training standards and timing and to ensure that construction activities do not result in a significant impact. No modifications to MM CUL-02C are required.

D2-49 As stated in MM CUL-02B, the CRMTP shall include a summary of California laws and contact information regarding the discovery of human remains. It is not specified in the measure that the CRMTP must include the procedures for discovery of human remains. The CRMTP will not be prepared before publication of the Final Subsequent EIR; therefore, the CPUC cannot evaluate the Plan's effectiveness. Rather, the CPUC specifies the components that are required to ensure impacts remain at a less-than-significant level. The specific procedures

in MM CUL-02D regarding human remains are necessary. MM CUL-2D is not repetitive of the requirements laid out in MM CUL-02B.

D2-50 Assembly Bill (AB) 52, enacted in September 2014, recognized that California Native American tribes have expertise regarding their tribal history and practices. AB 52 established a new category of cultural resources known as tribal cultural resources to consider tribal cultural values when determining impacts on cultural resources. The CRMTP (required by MM CUL-02B) has not been provided to CPUC and the description form SCE does not provide enough specificity to verify the measure will mitigate tribal resource impacts. MM CUL-02E is required to avoid or minimize impacts on tribal cultural resources in accordance with AB 52. The measure is not deleted.

D2-51 The text in Section 4.5.9: Revised Project Mitigation Measures MM CUL-02E is revised to clarify that this measure applies to inadvertent discoveries; however, the timeframe for tribal concurrence has not been revised:

> In the event of an inadvertent discovery, ~~N~~no activities shall be conducted within the boundaries of a known tribal cultural resource until SCE has obtained concurrence on avoidance and minimization methods from affected consulting tribes. The CPUC shall make a final determination if SCE cannot obtain concurrence from the tribes within 60 days of initial identification of the potential cultural resource conflict.

D2-52 Most of the Revised Project work areas would be located in young quaternary alluvium where paleontological sensitivity is low. Significant paleontological resources could still be found, but the probability is low. MM CUL-04A only requires part-time monitoring in areas with low sensitivity, which could be necessary depending on the specific location. The suggested language in MM CUL-04A in Section 4.5.9: Revised Project Mitigation Measures, has been revised as follows:

MM CUL-04A: Paleontological Monitoring (Low-Sensitivity Formations)
Ground-disturbing activities that occur in areas with indeterminate, low, or marginal paleontological sensitivity may be monitored on a part-time basis ~~at the discretion of the~~ as outlined in the Paleontological Monitoring and Treatment Plan (PMTP) prepared by the qualified paleontologist.
Applicable Locations: Excavations in project areas ~~with an indeterminate, low, or marginal paleontological sensitivity~~ as outlined in the PMTP
Performance Standards and Timing: • **Prior to Construction:** N/A • **During Construction:** Spot-checking during construction • **Following Construction:** N/A

D2-53 The analysis under Impact Hazards-i does not only refer to the possibility of shock hazard to the public but also to utility workers conducting maintenance on

underground utility infrastructure within the Revised Project area. The possibility of unidentified utility lines in the area becoming energized exists and, thus, poses a danger to workers. The significance conclusions in the analysis remain unchanged and MM HAZ-05 is still required to ensure the risk of shock to the public and workers is less than significant.

D2-54 SCE did not provide their standards for touch voltage protection, so ANSI/IEEE substation standards were used. MM HAZ-05 has been revised to remove the inappropriate use of the ANSI/IEEE Standard 80 touch voltage thresholds as it relates to substations. The measure now more accurately reflects standard CPUC and SCE transmission line safety protocol. The following revisions have been made to MM HAZ-05 in Section 4.7.9: Revised Project Mitigation Measures:

MM HAZ-05: Induced ~~Current~~ Voltage Touch Study

SCE shall identify both aboveground and underground objects (e.g., metal fences or buried metal utility lines such as pipelines or metallic communication conductors, etc.) in the vicinity of the Proposed Project that may potentially present a shock hazard to the public or workers of any adjacent metallic utility lines, due to induced currents or voltages. The owner of any adjacent metallic utility lines shall be identified and notified about the Proposed Project. SCE shall acquire as-built documents or other facility location information from adjacent utility owners to evaluate the location and specifics of nearby metallic objects. SCE shall also obtain information/documentation from adjacent utility owners defining any quantitative hazardous shock thresholds for both public and worker exposures applicable to their facilities.

In the absence of more stringent hazardous shock thresholds from adjacent utility owners, SCE shall ensure that induced voltage does not exceed 25 volts to ground under normal and emergency operating conditions in accordance, or in accordance with any other quantitative SCE public and worker safety standards.

SCE shall prepare an Induced ~~Current~~ Voltage Touch study that evaluates the conductive and inductive interference effects of the Proposed Project components on the identified objects. The Induced ~~Current~~ Voltage Touch study shall model the conductive objects using the maximum anticipated voltage and/or current for the proposed 230-kV line under normal and emergency operating conditions and shall consider the construction details for the transmission line. The study shall also construct a model using fault conditions if such faults would result in higher voltages or currents on the Proposed Project facilities and higher induced voltages on adjacent metallic utilities. ~~The maximum acceptable touch voltage under steady state conditions is 15 volts and the threshold for fault conditions is specified in ANSI/IEEE Standard 80.~~ In the event that the modeled induced ~~current~~ voltage of a conductive objective exceeds ~~maximum touch voltage thresholds~~ hazardous shock thresholds, SCE shall install grounding or other appropriate measures to protect the public and workers of any adjacent metallic utility lines from hazardous shocks.

The Induced ~~Current~~ Voltage Touch study shall include the model voltage results of conductive objects prior to implementation of grounding or other measures and after implementation of grounding or other measures. SCE shall coordinate with the owners of any potentially affected adjacent utilities to ensure that the adjacent utilities are correctly represented in the model. SCE shall give any affected utility owner a copy of the Induced Voltage Touch study within 30 days of study completion. SCE shall provide any adjacent utility owner concerns regarding the study validity and results to the CPUC.

Sixty days prior to commencing construction, SCE shall provide the Induced ~~Current~~ Voltage Touch study to the CPUC for approval. The Induced ~~Current~~ Voltage Touch study shall include the criteria and approach that was used to determine what facilities could present a shock hazard, the results of the model prior to implementation of grounding or other measures, details of the grounding or other measures to be installed, and the results of the model after implementation of the grounding or other measures.

If safety hazards are identified during operation, SCE shall take appropriate corrective action and document the response in accordance with CPUC General Order 95. Safety devices such as traveling grounds, guard structures, and radio-equipped public safety roving vehicles and linemen shall be in place prior to the initiation of wire-stringing activities.
Applicable Locations: The entire proposed 230-kV transmission alignment
Performance Standards and Timing: • **Prior to Construction:** (1) Induced ~~Current~~ Voltage Touch study and model are submitted to CPUC at least 60 days prior to start of construction for approval, (2) Safety devices (i.e., traveling grounds, guard structures, and radio-equipped public safety roving vehicles and linemen) are in place prior to initiation of wire-stringing activities • **During Construction:** Ensure that all required grounding or other appropriate measures are implemented • **Following Construction:** Address any safety concerns and document corrective action ~~N/A~~

D2-55 Since publication of the Draft Subsequent EIR, the data regarding utilities in Table 4.7-4 has been revised to include additional underground utilities as detailed further in response A12-2. A natural gas pipeline is located in the Alternative 1 and 4 corridors. Additional details and analysis have been added under Impact Hazards-c for Alternative 1 in Section 4.7.11: Alternatives Impact Analysis, paragraph 15, based on the revised information as follows:

> ***Hazardous Emissions from Potential Damage to Underground Utilities***
> ~~Natural gas pipelines would be the only hazardous materials likely to occur in the Alternative 1 alignment.~~ Alternatives 1 and 4 are located along a known natural gas pipeline in Wineville Avenue and several sewer lines. Natural gas or sewage may be released as a result of accidental rupture to an underground pipeline; however, a release ~~concentrations of the gas would become diluted over distance, and~~ would not be hazardous at the nearest school, due to the distance of 1,150 feet ~~a distance of 1,150 feet~~ from the pipeline. Any gas would dissipate prior to reaching the school. ***The impact would be less than significant.***

D2-56 The suggested revision is not added to the Subsequent EIR because there is a risk to workers. Refer to response D2-53 for additional information related to the analysis of risk to the public and workers during operation of the alternatives. The known and potential presence of metallic public utility lines necessitates implementation of MM HAZ-05.

D2-57 Section 4.9: Land Use and Planning, Section 4.9.6: Revised Project Impact Analysis, paragraph 10, has been updated in accordance with SCE's suggestion as follows:

> The southern end of the Revised Project, including the eastern underground segment and the eastern riser poles would be constructed within the existing easement SCE holds on the Goose Creek Golf Club.

This easement ~~may~~ will need to be widened to cover access to and maintenance of transmission facilities.

D2-58 Section 4.10: Noise, Table 4.10-2, in the Subsequent EIR has been revised as shown below.

D2-59 Section 4.10: Noise, Table 4.10-2, has been revised to include the omitted table notes as follows:

Table 4.10-2 Summary of Ambient Noise Levels near the Revised Project [a]

Survey Location ID [b]	Survey Location	Dominant Noise Sources	Survey Date and Time	L_{Max} (dBA)	L_{eq} (dBA)
Overhead Alignment on Wineville Avenue					
LT-1 [c]	Wineville Avenue/ Cantu-Galleano Ranch Road	~~Overhead Alignment on Wineville Avenue~~ Vehicle/truck traffic	11/11/15–11/12/15 12:05 pm –1:25 pm	91	64
ST-1	Wineville Avenue/ Cantu-Galleano Ranch Road	Vehicle/truck traffic, locomotive horn	11/12/15 1:10 pm–1:25 pm	72	63
			11/12/15 2:35 am–2:50 am	73	61
ST-2	Landon Drive at Wineville Ave	Vehicle/truck traffic, industrial facility generator, locomotive horn	11/12/15 12:45 pm–1:00 pm	81	66
			11/12/15 2:10 am–2:25 am	81	71*
Underground Transmission Alignment					
ST-5	Park-and-Ride on Limonite Ave at I-15	Vehicle/truck traffic	11/12/15 11:20 am–11:35 am	73	60
			11/12/15 1:00 am–1:15 am	68	56
ST-6	68th Street at Carnellian Street	Vehicle/truck traffic	11/12/15 3:10 pm–3:25 pm	84	67
			11/12/15 12:35 am–12:50 am	66	50
ST-7	68th Street at Dana Ave	Vehicle/truck traffic	11/12/15 1:55 pm–2:10 pm	66	47
			11/12/15 12:10 am–12:25 am	43	36
Existing Distribution Line Relocations #7 and #8					
ST-8	Grulla Court at Pinto Lane	Vehicle traffic	11/12/15 2:35 pm–2:50 pm	71	53
			11/11/15 12:10 am–12:25 am	51	43

Survey Location ID [b]	Survey Location	Dominant Noise Sources	Survey Date and Time	L_{Max} (dBA)	L_{eq} (dBA)
ST-10	Julian Drive at Crest Ave	Vehicle traffic and aircraft flyovers	11/11/15 4:55 pm–5:10 pm	68	52
			11/11/15 10:55 pm–11:10 pm	59	49

Notes:

[a] Noise monitoring was not conducted near the Etiwanda Marshalling Yard.

[b] Survey location shown on Figure 4.10-2 and Figure 4.10-3. Locations included in this table are selected because they are near the revised project. The Noise Technical Report (SCE, 2017b) includes ambient noise data for the entire proposed project alignment.

[c] A CNEL calculation is only provided if a long-term noise measurement was conducted at the site.

* L_{eq} at this location is likely inaccurate based on other noise metric measurements at this location.

Source: (SCE, 2017b)(SCE, 2017b)

D2-60 The purpose of the threshold is to reduce impacts on individuals attending class by ensuring that construction noise levels do not exceed 65 dBA (L_{eq}) at the exterior walls of the school instructional facilities while school is in session. The majority of the existing noise measured at 68th Street at Carnelian Street is caused by vehicle and truck traffic, as noted in Table 4.10-2. Ambient noise levels at the classroom would be below 65 dBA (L_{eq}) because the sound wall along the perimeter of Louis Vandermolen Fundamental Elementary School reduces traffic noise. Construction noise would not be permitted to contribute greater than 65 dBA (L_{eq}). As stated in the analysis, only pile driving would result in an exceedance of the threshold, which would be reduced by implementing EPE NOI-04.

D2-61 The impact of the Revised Project in relation to Jurupa Valley and City of Riverside noise standards are analyzed in Impact Noise-a. The cities of Jurupa Valley and Riverside exempt construction noise within daytime hours (refer to Section 4.10-5 of the Subsequent EIR); however, the City of Jurupa Valley restricts high-noise-generating equipment to between the hours of 9:00 am and 3:00 pm. The CPUC's analysis under Impact Noise-a analyzes the construction noise generated by the project compared to the noise standards set by each city. Construction noise that exceeds the noise standards outside of allowable construction hours would be a significant impact. The CPUC is restricting construction activities to within the city-approved hours or requiring that SCE abide by the noise levels identified for residences. Construction noise that occurs outside city-approved construction hours would not be permitted to exceed the quantitative noise thresholds identified. EPEs and mitigation measures are identified that fully reduce the impacts from conflicts with noise standards.

Table 4.10-2 of the Subsequent EIR provides ambient noise levels observed in the project area. Ambient noise levels are intended to describe the pre-construction

noise setting and are used to establish noise increases under Impact Noise-c (permanent noise increases) and Impact Noise-d (temporary noise increases).

D2-62 The CPUC has adopted some of SCE's suggested edits to the description of equipment required for Distribution Line Relocations #7 and #8. The modified analysis under Impact Noise-a in Section 4.10.8: Revised Project Impact Analysis, paragraph nine, is provided below. The Subsequent EIR analysis was based on the construction schedule proposed by SCE, which states that construction would occur within "normal work days, with no weekend or holiday construction planned". The schedule did not include construction activities, including vault installation, on weekends. The analysis throughout the Subsequent EIR follows this assumption and is consistent with the construction schedule provided in the certified 2013 RTRP EIR. The analysis indicates that construction of the Revised Project would last approximately 18 months.

> Underground construction at Distribution Line Relocations #7 and #8 would not require ~~similar equipment~~ as much time and would not require the heavy equipment needed for the 230-kV transmission line. Trench and vault installation activities would move along the underground alignment during construction. Receptors along the underground alignment would be exposed to construction noise for up to 3 weeks, excluding weekends, during vault installation, and for shorter time periods during trenching, and cable installation.

D2-63 High-noise-generating equipment is defined as equipment that produces noise levels of 85 dBA or greater at a distance of 50 feet. Noise attenuates at approximately 6 dBA per doubling of distance; therefore, high-noise-generating equipment would generate noise levels of 91 dBA or greater at a distance of 25 feet. Noise barriers can reduce noise levels by up to 10 dBA, at most (FHWA, 1974). It is not feasible to reduce the L_{max} noise levels caused by high-noise-generating equipment to below the quantitative City of Jurupa Valley noise threshold (55 dB L_{max} for daytime and 45 dB L_{max} for nighttime) using typical noise barriers. The commenter's suggestion was considered, but the construction hours for high-noise-generating construction activities in MM NOI-01 will remain from 9:00 am to 3:00 pm to ensure compliance with Policy NE 3.5 of the City of Jurupa Valley 2017 Draft General Plan. MM NOI-01 requires the use of noise reduction devices such as mufflers, barriers, and acoustic panels when construction occurs within 100 feet of residences. Activities within 100 feet of residences would be predominantly underground construction within streets. Work hours within roadways are defined in MM TRANS-02, which prohibits work within streets during peak traffic periods and would require underground construction within streets to cease at 3:30 pm. Therefore, an extension of the approved hours for high-noise-generating equipment would not provide substantial additional work hours.

The CPUC has accepted SCE's clarification of the definition of high-noise-generating equipment in Section 4.10.9: Revised Project Mitigation Measures as follows:

MM NOI-01: High-Noise-Generating Equipment

SCE shall implement typical noise-reducing construction practices as identified in EPE NOI-03 and EPE NOI-4 to reduce noise levels when working within 100 feet of receptors. If high-noise-generating equipment must be used, SCE shall limit the use of high-noise-generating equipment to between the hours of 9:00 am and 3:00 pm when constructing within 100 feet of receptors in the City of Jurupa Valley. High-noise-generating equipment shall be defined as any piece of equipment that generates a maximum (L_{max}) noise level of 85 dBA or greater at a reference distance of 50 feet from a sensitive receptor where noise mitigating structures (such as sound walls) do not exist. The following equipment have been identified as high-noise-generating equipment:

- Clam shovel
- Concrete saw
- Jackhammer
- Hydra break ram
- Pile driver
- Vacuum excavator

Applicable Locations: All Revised Project locations within the City of Jurupa Valley where high-noise-generating equipment is used within 100 feet of residences

Performance Standards and Timing:

- **Prior to Construction:** N/A
- **During Construction:** Limit high-noise-generating equipment use in Jurupa Valley to between 9:00 am and 3:00 pm
- **Following Construction:** N/A

D2-64 The noise measurements were collected on a two-lane road, which is narrower than Pats Ranch Road and much of 68th Street. Vehicle speeds on Pats Ranch Road and 68th Street are expected to be similar to vehicle speeds at the location the noise measurements were made. As noted in the Subsequent EIR, the trench plates were skid-resistant metal. The maximum noise level from vehicles traveling across trench plates, assuming the same material, would be similar or potentially greater on Pats Ranch Road and 68th Street, west of Wineville Avenue and Holmes Avenue. MM NOI-03 provides feasible options for minimizing noise impact from trench plates, including reducing speeds in areas of construction, properly securing trench plates, and utilizing trench plates of a low noise-generating surfacing and/or material. The text and mitigation measure are not deleted as suggested.

D2-65 Any construction activities within 300 feet of sensitive receptors that occur after 6:00 pm in Jurupa Valley or 7:00 pm in Riverside could potentially conflict with local nighttime noise standards, which would be a significant impact. Noticing or use of other noise reduction techniques would not minimize the noise levels to below 45 dBA and a conflict would still occur. The intent of MM NOI-02 is to

ensure that construction activities in excess of 45 dBA at sensitive receptors within 300 feet of sensitive receptors would not occur after 10:00 pm in the City of Jurupa Valley. The edit suggested by SCE was considered but not accepted.

D2-66 The analysis under Impact Noise-a is based on an impact threshold of 65 dBA at the exterior walls of classrooms. Daytime ambient noise at outdoor school facilities is anticipated to be 59 dBA L_{eq} and is calculated assuming the sound wall accounts for an 8 dBA reduction from the noise level measured for location ST-6 (Refer to Table 4.10-2). Ambient noise at the nearest classroom would be 50 dBA and would not exceed the 65 dBA threshold. Construction noise at the classroom would reach up to 65 dBA (L_{eq}) at the classroom when a pile driver is not in use and would not exceed the 65 dBA threshold. Noise from a pile driver would exceed the threshold and cause a significant impact, which would be reduced by implementing EPE NOI-04.

For clarity, the following revisions in Section 4.10.8: Revised Project Impact Analysis, paragraph 25, have been incorporated into the Subsequent EIR as follows:

> Outdoor facilities of the Louis Vandermolen Fundamental Elementary School would be located approximately 50 feet from underground construction. Classrooms would be located approximately 140 feet away. A concrete sound wall exists along the perimeter of the school facing 68th Street. Pre-construction noise levels at the school on the north side of the sound wall (at outdoor school facilities) are modeled to be approximately 59 dBA (L_{eq}), considering an 8-dBA reduction from the sound wall. Noise from underground transmission line construction would reach 74 dBA (L_{eq}) at the outdoor school facilities and 65 dBA (L_{eq}) outside the nearest classroom. If ~~the sound wall is present~~ pile drivers are required, pile driving noise within 560 feet of the nearest classroom ~~school~~ would exceed 65 dBA (L_{eq}). The noise impact from pile driving would be significant.

D2-67 SCE's suggested revisions under Impact Noise-d in Section 4.10.8: Revised Project Impact Analysis, paragraph 51, have been incorporated as follows:

> Use of mufflers, portable barriers, non-noise-producing mobile equipment such as trailers, and acoustical panels would reduce construction noise by 8 to 10 dBA; however, noise increases would still be significant.

D2-68 Noise impacts from high-noise-generating equipment and the extension of construction work hours is discussed in D2-63. Refer to response D2-63 for revisions to the Subsequent EIR MM NOI-1.

D2-69 MM NOI-02 requires SCE to plan ahead and ensure that all construction activities with the potential to exceed the City-identified noise ordinance limits within 300 feet of receptors, including concrete pours, are completed by 6:00 pm in Jurupa Valley and 7:00 pm in Riverside to avoid conflicts with local noise ordinances. Construction must occur within the city-approved hours or abide by the noise levels identified for residences to be in compliance with noise standards. The impact would be significant if the noise occurred outside of the specified hours. Granted the activity does not result in an exceedance of 55 dBA at the nearby residences between 6:00 pm and 10:00 pm or 45 dBA between 10:00 pm and 7:00 am, the activity may continue. The suggested edit is not accepted.

D2-70 The suggested edits are not accepted. Refer to response D2-64.

D2-71 Construction noise can be audible and disruptive at considerable distances from the construction equipment. High-noise-generating equipment used for the Revised Project would generate noise levels of 85 dBA, L_{max} or greater at 50 feet, which would attenuate to between 60 and 65 dBA, L_{max} at 500 feet from the equipment (some locations may experience additional attenuation from intervening structures). These intermittent or continuous high-noise levels of between 60 and 65 dBA would be noticeable and possibly disruptive to sensitive receptors within 500 feet. Therefore, it is appropriate for SCE to notify sensitive receptors and residences within this distance. The suggested revision from 500 to 300 feet is not accepted.

The option for residents to request alternative lodging has been removed from MM NOI-04 because construction would be confined to the daytime only, with implementation of MM NOI-02. Residents' sleep would not be disrupted by construction activities but, as analyzed under Impact Noise-d, the temporary impact from daytime construction would still be significant and unavoidable. MM NOI-04 in Section 4.10.9: Revised Project Mitigation Measures is revised as follows:

MM NOI-04: Construction Notification

SCE shall provide notice by mail at least 1 week prior to construction activities to all sensitive receptors and residences within 500 feet of all construction. The announcement shall state where and when project construction will occur and provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction. Notices shall also include the phone number for the noise complaint telephone hot-line described in EPE NOI-1. ~~Notified residents may request alternative lodging for the days that active construction is occurring adjacent to their residence; alternative lodging shall consist of a standard room at a hotel located within 6 miles of the affected residence or as close as feasible.~~

Applicable Locations: Sensitive receptors and residences within 500 feet of construction

Performance Standards and Timing:

- **Prior to Construction:** Post and mail notices at least 1 week prior to construction activities
- **During Construction:** N/A
- **Following Construction:** N/A

D2-72 Limonite Meadows Park, and Vernola Family Park, and the park on northwest corner of Bellegrave and Wineville Avenue are not considered passive recreation areas for this noise impact analysis. These developed parks are considered active recreation areas that generate noise associated with active recreational activities, such as noise from sports and children in playgrounds. Table 4.10-11 was not revised as suggested.

D2-73 The No Project Alternative noise analysis includes evaluation of construction and operation of battery storage facilities that would likely occur without the Revised Project. The analysis does not consider the ambient noise from all other possible future land use projects in the area because such an analysis would be highly speculative and based on an insufficient amount of available data.

D2-74 The provision of the European Standard CEN/TS 1528 was for informational purposes only and was not used as an impact threshold. The transmission line is required to be constructed in accordance with CPUC General Order 95 (Rule 92.4) and 128 (Rule 36) to ensure public and worker safety. The design standard has been removed from the text. The requirement for SCE to conduct an Induced Current Touch Study per MM HAZ-05 has not changed in response to this comment. Refer to D2-54 for the modified text of MM HAZ-05.

D2-75 Text was not removed from MM UTIL-01 because the language does not conflict with the suggested addition. The suggested language was added to MM UTIL-01 in Section 4.11.9: Revised Project Mitigation Measures as follows:

MM UTIL-01: Notify Utility Companies and Adjust Underground Work Locations

SCE shall notify all utility companies with utilities located within or crossing SCE ROW and franchise agreement areas to locate and mark existing underground utilities along the entire length of the revised overhead and underground alignments at least 30 days prior to construction. No subsurface work shall be conducted that would conflict with (i.e., directly impact or compromise the integrity of) a buried utility. Conflicts shall be identified and addressed with the affected utility during final engineering. In the event of a conflict, the Revised Project alignment shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering. SCE shall provide CPUC with documentation of contact and response from the utility companies prior to construction. SCE shall also provide documentation of any changes in the Revised Project alignment for review and approval at least 30 days prior to construction.

Applicable Locations: Revised Project underground alignments

Performance Standards and Timing:

- **Prior to Construction:** (1) SCE notifies utility companies at least 30 days prior to construction, (2) Existing underground utilities are marked within the Revised Project alignment, (3) SCE provides CPUC with documentation of contact and response from the utility companies, and documentation of any changes in the Revised Project alignment
- **During Construction:** Underground utilities are avoided, and the integrity of existing underground utilities is maintained
- **Following Construction:** N/A

D2-76 The suggested edits to Section 4.11.9: Revised Project Mitigation Measures, MM UTIL-03: Cathodic Protection have been incorporated as follows:

MM UTIL-03: Cathodic Protection

During final engineering SCE shall determine and report to CPUC the location of adjacent utilities. If SCE identifies utilities in proximity of the 230-kV transmission line that may be susceptible to corrosion due to induced currents or voltages, SCE shall conduct an alternating current interference study that evaluates the alternating current interference effects of the proposed 230-kV transmission line on nearby parallel metallic pipelines and other utilities. The study shall include the development of a model using the maximum anticipated voltage for the proposed transmission line and shall consider the construction specifications for the transmission line, including conductor arrangement. ~~In addition, SCE shall identify utility facilities within 100 feet of the proposed transmission line that may be susceptible to corrosion due to induced currents or voltages.~~ For all utilities identified with a corrosion potential, SCE shall coordinate with the owner of the utility and use data gathered in the alternating current interference study to determine appropriate design measures to protect the pipeline from corrosion, such as ground mats or gradient control wires for cathodic protection of the buried utility pipelines and other utilities. The study, summary of coordination with potentially affected utilities, and specifications of any design measures to be installed shall be submitted to the CPUC for review and approval at least 60 days prior to initiation of construction. If there are no utilities identified with a corrosion potential as verified by the CPUC, no alternating current interference study or cathodic protection mitigation is required.

Applicable Locations: Revised Project underground alignment

Performance Standards and Timing:

- **Prior to Construction:** Interference Study Report shall be submitted to the CPUC 60 days prior to construction
- **During Construction:** SCE coordinates with the owner of the utility to implement appropriate design measures
- **Following Construction:** N/A

D2-77 Language has been added for clarification to Section 4.11: Public Services and Utilities, Section 4.11.11 Alternatives Impact Analysis, paragraph 11, as follows:

> **Operation and Maintenance**
> The 230-kV transmission line may cause corrosion on buried metallic pipelines that run parallel to the transmission line within the Alternative 1, 2, or 4 alignment. The rate of corrosion varies depending on the size and material of the pipeline. Impacts to utilities would be significant if induced current from the Revised Project exceeded the current density standards on parallel, metallic pipelines and other utilities. The implementation of MM UTIL-03 requires SCE to identify adjacent utilities that may be susceptible to corrosion due to induced currents or voltages and ~~would~~ incorporate design features necessary for cathodic protection to reduce impacts associated with corrosion to buried pipelines. ***The impact would be less than significant with mitigation.***

D2-78 The proposed 2013 alignment analyzed in the certified 2013 RTRP EIR was not approved or permitted by the CPUC and is no longer proposed by SCE. Reference to similarity between the proposed 2013 alignment and the alignment

of the underground 230-kV transmission line provides no pertinent information needed to analyze the impacts of the Revised Project in the Subsequent EIR.

D2-79 The timeframe for trenching activities affecting recreational facilities was calculated using the schedule provided by SCE, which estimated a duration of 110 days for all trenching activities. The 110 days for construction was provided in response to Data Request #7. The duration was divided by the length of the trenching activities which resulted in 5.3 days per 0.1 mile. The length of the trenching activities intersecting recreational trails was measured and then multiplied by 5.3 days per 0.1 mile to determine the duration of time access to the trails could be interrupted.

D2-80 Section 1.5.1 specifies that preparation of a Subsequent EIR is required pursuant to CEQA Guidelines Section 15162. As such, the CPUC determined that a Subsequent EIR is the proper CEQA document to address environmental impacts from the Revised Project. No further revisions are needed.

D2-81 The significance of impacts before and after EPEs is considered to be consistent with recent CEQA case law (specifically *Lotus v. Department of Transportation [2014] 223 Cal App 4th 645*). Refer to response D1-15 for a detailed reasoning as to why the significance prior to and after application of EPEs is specified throughout the Subsequent EIR.

D2-82 The comment refers to referenced text in Section 4.12: Recreation and refers to recreation impacts. Relocation of the overhead 230-kV transmission line to the west side of Wineville Avenue would cause new aesthetics impacts due to the new residents on the east side of Wineville Avenue. The impact on visual quality would be significant and unavoidable, as described further in Section 4.1: Aesthetics, because the transmission line would be closer to residents. The text in Section 4.12: Recreation, Section 4.12.7: Revised Project Impact Analysis, paragraph five has been revised to provide specificity, as follows:

> The relocation of the overhead 230-kV transmission line to the west side of Wineville Avenue would not result in any new or greater impacts on recreational facilities than analyzed in the 2013 RTRP EIR. No further analysis of the change in location of the overhead alignment along Wineville Avenue is needed.

Alternative 4 was appropriately developed and considered to avoid the significant visual effect.

D2-83 Figure 4.12-1 and 4.12-2 show the locations of trails in the Revised Project area. Table 4.12-4 identifies the Revised Project impacts on trails. Construction would require temporary trail closures (from 7 days for the Santa Ana River Trail to up to 53 days for a primary equestrian trail). Four trails would require closure for 5 to 34 days for trenching and 7 to 28 days for vault installation. Mitigation measures are required to reduce the impact.

D2-84 SCE is responsible for implementing all applicable mitigation measures identified in the certified 2013 RTRP EIR. As such, all certified 2013 RTRP EIR mitigation measures applicable to the Revised Project were incorporated into the Subsequent EIR to ensure that SCE would not need to implement conflicting mitigation measures. Any additional requirements were identified in new mitigation measures. MM REC-01 is a measure identified in the certified 2013 RTRP EIR. The suggested revisions to the text are not consistent with MM REC-01. The revision is not accepted.

D2-85 The text in Section 4.12.7: Revised Project Impact Analysis, paragraph 14, has been modified to accurately reflect the requirements of EPE REC-03 and highlight the need for MM REC-04 regarding trails as follows:

> SCE would implement EPE REC-03; which requires SCE to revegetate any park areas temporarily affected by project construction or return them to pre-construction conditions. The EPE does not specify any revegetation or restoration requirements for trails. ~~revegetation of all trails affected by project construction, returning them to pre-construction conditions. While EPE REC-03 requires trail restoration to pre-construction conditions, a significant impact could still occur it the pre-construction condition was not adequately documented, resulting in inadequate restoration of the trail condition.~~ MM REC-04 requires that the pre-construction condition of trails is documented, and adequate repairs are made to any recreational facilities degraded by construction activities. ***Impacts on trails from construction activities would be less than significant with mitigation.***

D2-86 The text in Section 4.12.7: Revised Project Impact Analysis, paragraph 12, has been modified to reflect that SCE will coordinate with the Goose Creek Golf Course owner as follows:

> MM REC-04 requires SCE to prepare a Pre-Project Trail and Recreation Area Condition Report prior to construction that documents the condition of the golf course within the Revised Project work areas. SCE shall repair all damage to the golf course caused by construction vehicles and equipment, in consultation with the golf club owner, by the completion of construction. SCE

shall prepare a Post-Project Trail and Recreation Area Condition Report documenting the final state of the Goose Creek Golf Course within the Revised Project work areas.

D2-87 SCE's request for clarification regarding which certified 2013 RTRP EIR mitigation measures are applicable is noted. The MMRP will explicitly identify the mitigation measures SCE is expected to comply with, including the certified 2013 RTRP EIR measures that are unchanged by the Subsequent EIR. The title of the mitigation measures that appear within each resource section clearly identifies those measures that were first defined in the certified 2013 RTRP EIR. Mitigation from the certified 2013 RTRP EIR includes "(2013 RTRP EIR)" following the measure title.

D2-88 Trail users must be alerted to a detour if a trail is closed. A dead-end trail is not permissible. Identification and use of existing trails or unvegetated areas is feasible. Unvegetated also refers to paved areas. Based on the existing trail and sidewalk network, adequate detours exist. The text of MM REC-03 in Section 4.12.8: Revised Project Mitigation Measures has been revised as follows:

MM REC-03: Maintain Access to Trails

SCE shall identify existing alternate routes to allow trail and path users to circumvent trail segments that are closed due to construction activities. Trail detours must be located on existing trails or unvegetated areas and shall not be located where they could impact sensitive biological resources. Trail detours may be placed, when feasible and safe to do so, along the perimeter of active work areas or through inactive work areas when it is safe to do so. ~~Proposed~~ SCE shall propose alternate routes ~~shall be~~ delineated on project plans and provided to the CPUC at least 30 days prior to construction for review and approval.

Signs shall be posted at trail entrances to inform trail users of construction activities that may be encountered, such as excavations, and vehicles and equipment on trails.

Applicable Locations: Revised Project construction work and staging areas at 68th Street and Lucretia Avenue, 68th Street and Dana Avenue, Limonite Avenue and Pats Ranch Road, Landon Drive and Wineville Avenue, and at Distribution Line Relocations #7 and #8

Performance Standards and Timing:

- **Prior to Construction:** Submittal of proposed alternative trail and bike path routes to CPUC for review and approval at least 30 days prior to construction
- **During Construction:** SCE installs and maintains signs informing trail users of detours or closures
- **Following Construction:** N/A

D2-89 The suggested edit to MM REC-04 in Section 4.12.8: Revised Project Mitigation Measures is accepted to allow a short additional time to complete repairs after construction (refer to revisions to the MM REC-04, below).

The sentence "SCE shall restore all LWCF land to pre-existing conditions within 12 months from the start of construction." is not deleted to ensure the lands are restored within 12 months of the start of construction. The disturbed land would

be considered a land conversion if it was not restored in the allotted timeframe, and would be considered a significant impact.

SCE did not provide justification for replacing the specified Post-Project Trail and Recreation Area Condition Report with "final documentation." The suggested deletion of the specified Condition Report is not accepted. The suggested revision to 60 days to complete the Condition Report is accepted.

The suggested edits regarding consent for repairs from the affected property owners/managers are accepted.

MM REC-04 is revised as follows:

MM REC-04: Trail and Recreation Area Conditions and Repairs
SCE shall prepare a Pre-Project Trail and Recreation Area Condition Report prior to construction that documents the condition of designated trails, proposed detour routes, and recreational areas located within Revised Project work areas. The Pre-Project Trail and Recreation Area Condition Report shall be submitted to the CPUC no less than 30 days before construction. SCE shall repair all damage to trails, detour routes, and recreation areas caused by construction vehicles and equipment ~~by the~~ within 30-days after completion of construction. SCE shall prepare a Post-Project Trail and Recreation Area Condition Report documenting the final state of all trails and recreation areas within the Revised Project work areas. The Post-Project Trail and Recreation Area Condition Report shall be submitted to the CPUC within ~~30~~ 60 days of completing construction in each project segment. SCE shall complete all trail and recreation area repairs to the approval of the appropriate land owner, land agency, or city. SCE shall provide copies of the approval to the CPUC. SCE shall restore all LWCF land to pre-existing conditions within 12 months from the start of construction.
Applicable Locations: Revised Project construction areas at 68th Street and Lucretia Avenue, 68th Street and Dana Avenue, Limonite Avenue and Pats Ranch Road, Landon Drive and Wineville Avenue, at Distribution Line Relocations #7 and #8, and Goose Creek Golf Club
Performance Standards and Timing: • **Prior to Construction:** SCE submits a Pre-Project Trail and Recreation Area Condition Report to the CPUC 30 days before construction • **During Construction:** Trail and recreation area damage is adequately repaired within 12 months from start of construction • **Following Construction:** SCE submits a Post-Project Trail and Recreation Area Conditions Report to the CPUC within ~~30~~ 60 days of completing construction

D2-90 MM TRANS-02 does not have the same requirements as MM NOI-01 and is designed to reduce a different impact. MM NOI-01 does not restrict road and lane closures during the peak hours.

MM TRANS-02 and MM TRANS-02A are designed to address peak hour impacts caused by lane and road closures during construction of the Revised Project. Feasible mitigation must be implemented to minimize impacts, even for significant and unavoidable impacts. Traffic hazard impacts would be reduced to less than significant with implementation of MM TRANS-02 and MM TRANS-02A. No revision to the applicability of these measures has been

made as the measures are feasible and necessary. Similar mitigation was imposed upon the Sycamore-Peñasquitos 230-kV Transmission Line Project and the Sunrise Powerlink Project.

D2-91 The requested deletion of text referencing applicability to maintenance activities in Section 4.14.9: Revised Project Mitigation Measures, MM TRANS-02A is accepted as follows:

MM TRANS-02A: Avoid Peak-Period Closures and Obstructions on All Roadways

To minimize traffic congestion and delays during construction ~~and maintenance~~ of the underground 230-kV transmission line, SCE shall schedule all necessary road or lane closures or obstructions on all roadways associated with project construction ~~and maintenance~~ activities during off-peak periods. Road and lane closures shall be avoided during the 6:00 a.m. to 9:00 a.m. timeframe and the 3:30 to 6:30 p.m. timeframe, or as otherwise defined within CPUC and City-approved traffic control plans.

Applicable Locations: Construction of the underground 230-kV transmission line

Performance Standards and Timing:

- **Prior to Construction:** N/A
- **During Construction:** Restrict road and lane closures and other obstructions on all roads to off-peak periods
- **Following Construction:** ~~Restrict road and lane closures and other obstructions on all roads to off-peak periods~~ N/A

D2-92 The applicable certified 2013 RTRP EIR mitigation measures were incorporated into the Subsequent EIR to ensure that SCE would not need to implement conflicting mitigation measures. Any additional requirements were identified in new mitigation measures. MM TRANS-04 is a measure identified in the certified 2013 RTRP EIR. SCE is responsible for implementing all applicable mitigation measures identified in the certified 2013 RTRP EIR.

The Revised Project would involve underground construction, which could result in road and lane closures not previously analyzed in the certified 2013 RTRP EIR. The measure in isolation was not adequate to reduce the impacts from underground construction on public transit as specific requirements for coordination for the Riverside Transit Authority and relocation of bus stops were not identified. Additional requirements were incorporated into MM TRANS-08 to reduce the impact on public transit to less than significant. SCE is responsible for implementing MM TRANS-04 and MM TRANS-08.

D2-93 Revisions have been made to Section 4.14.9: Revised Project Mitigation Measures, MM TRANS-06 removing the requirement for approval of the Traffic Control Plans by the City of Jurupa Valley, as follows:

MM TRANS-06: Prepare Traffic Control Plans

Prior to the start of construction, SCE shall prepare and submit Motorized and Non-Motorized Traffic Control Plans (TCPs) to the CPUC for review and approval at least 60 days prior to commencing construction activities. The plans shall be prepared in consultation with all agencies with jurisdiction (e.g., City of Jurupa Valley) over public roads that would be directly affected by construction activities (where road closures or encroachments would be necessary) ~~for review and approval at least 60 days prior to commencing construction activities~~.

At a minimum, the TCPs shall include the following details and traffic control measures:

- **Lane and Road Closures**
  - Details regarding the locations and timing of all temporary road and lane closures.
  - Implement standard safety practices, including installation of appropriate barriers between work zones and transportation facilities, placement of appropriate signage, cones, and use of traffic control devices.
  - Designate traffic detours for any road or lane closures with appropriate signage marking the detours.
- **Construction Traffic**
  - Time worker commutes and material deliveries to avoid peak (AM and PM) commuting hours.
  - Workers shall carpool to and from work sites and Etiwanda Marshalling Yard.
  - Plans for construction worker parking and transportation to work sites.
- **Traffic Safety**
  - Use flaggers and/or signage to guide vehicles through or around construction zones using proper techniques for construction activities including staging yard entrance and exit.
  - Store all equipment and materials in designated work areas in a manner that minimizes traffic obstructions and maximizes sign visibility.
  - Limit vehicles to safe speed levels according to posted speed limits, road conditions, and weather conditions.
  - Route trucks to avoid minor roads, where possible, to reduce congestion and potential asphalt damage.
- **Encroachment Permit**
  - Abide by encroachment permit conditions, which shall supersede conflicting provisions in the TCP.
- **Notification**
  - SCE shall notify local emergency personnel (i.e., fire departments, police departments, ambulance, and paramedic services), residents within 300 feet, and schools providing school bus service in the area (e.g., Troth Elementary and Louis Vandermolen Fundamental Elementary) at least 7 days prior to lane or road closures. The notice shall include location(s), date(s), time(s), and duration of closure(s), and a contact number for SCE project personnel.
- **Access**
  - Emergency access procedures shall be defined. SCE shall be ready at all times to accommodate emergency vehicles by maintaining a minimum of one lane clear or easily cleared on urban arterials and secondary roadways, immediately stopping work for emergency vehicle passage, providing short detours, and providing alternate routes developed in conjunction with local agencies.
  - SCE shall maintain travel through intersections at all times during construction, operation, and maintenance.
  - SCE or its construction contractors shall provide the ability to ~~quickly~~ lay a temporary steel plate trench bridge upon request of the property owner in order to ensure reasonable driveway access to businesses and residences adjacent to work areas during construction hours, and shall

provide continuous access to adjacent properties when not actively constructing the underground 230-kV transmission line. In the event of an emergency, steel plating shall be placed over underground work areas and vehicles/equipment shall be removed from the partially or fully closed roadways to the greatest extent feasible, as needed, to permit uninterrupted traffic flow. SCE or its construction contractor shall designate a job site manager responsible for ensuring emergency access. All workers shall be trained in emergency access procedures.
Applicable Locations: Underground 230-kV transmission line construction work areas and traffic routes
Performance Standards and Timing: • **Prior to Construction:** (1) Prepare Motorized and Non-Motorized TCPs, (2) Submit TCPs to the CPUC and City of Jurupa Valley • **During Construction:** Implement the traffic control measures detailed in the TCPs • **Following Construction:** N/A

D2-94 The formatting error hiding the title of MM TRANS-06 was corrected. Due to the large work areas required for vault and duct tank installation, access to properties directly adjacent to work areas could be hindered outside of construction hours. This is true for all properties, not just those along 68th Street to the east of Wineville Avenue/ Holmes Street. Alternative access, such as from an alley behind a residence, is not available in any location. The requirement pertains to these properties and the measure has been revised for clarity. The requested narrow scope of the measure was not added.

D2-95 The requested information detailing what the pre-construction road and sidewalk condition assessment would include as well as specificity regarding what condition the roadways would be returned to, has been added to Section 4.14.9: Revised Project Mitigation Measures, MM TRANS-07 as follows:

MM TRANS-07: Post-Construction Road and Sidewalk Repair
SCE shall conduct a pre-construction road and sidewalk condition assessment along roadways and sidewalks along the underground alignment and construction traffic routes, prior to construction. The pre-construction road and sidewalk condition assessment shall include photographs or a video recording. The assessment shall be conducted along the construction route public roads within 500 feet in each direction of project access points and roadways where the road surface would be damaged by project-related trenching and digging. SCE shall submit the pre-construction road and sidewalk condition assessment to the CPUC and the City of Jurupa Valley no less than 30 days prior to construction. Following construction, SCE shall conduct a post-construction road and sidewalk condition assessment along 68th Street, Pats Ranch Road, Limonite Avenue, Wineville Avenue, Cantu-Galleano Ranch Road, and Etiwanda Avenue. If damage to roads occurs as a result of project construction or construction traffic, SCE shall restore damaged roadways and sidewalk (e.g., asphalt, curbs, and gutters) within 60 days after the completion of construction to a pre-construction condition, based on the pre-construction road and sidewalk condition assessment, or to a condition agreed upon by SCE and the roadway owner, at their own expense ~~under the direction of and to the construction standard of the City of Jurupa Valley to ensure that impacted roads are adequately repaired~~.
Applicable Locations: Underground 230-kV transmission line construction work areas and traffic routes
Performance Standards and Timing:

- **Prior to Construction:** Submit pre-construction road and sidewalk condition assessment covering applicable roadways to the CPUC and the City of Jurupa Valley no less than 30 days prior to construction
- **During Construction:** N/A
- **Following Construction:** (1) Conduct a post-construction road and sidewalk condition assessment along applicable roadways, (2) If damage is found, repair of damaged roadways and sidewalks will occur within 60 days of completion

D2-96 MM TRANS-08 does not apply to operation and maintenance activities. The requested revision to the performance standards and timing for MM TRANS-08 in Section 4.13.9: Revised Project Mitigation Measures has been made as follows:

- **Following Construction:** ~~(1) Post signs 2 weeks prior to construction, at bus stops and pedestrian intersections that will be affected by closures and/or detours, (2) Notices will provide information regarding the duration of closure and detour/alternate routes, (3) Erect "share the road" signs within construction zones where partial closures will occur~~ N/A

D2-97 The reference error has been corrected to Section 4.13.10: Alternatives Setting reference Table 4.13-16.

Table 4.13-16 ~~**Error! Not a valid bookmark self-reference. Error! Reference source not found.**~~.

D2-98 The alternatives analysis methodology is described in Chapter 4: Environmental Analysis. In accordance with accepted CPUC analysis practices, the alternatives analyses focus only on the isolated segment. Chapter 6: Comparison of Alternatives provides a comparative analysis of the impacts of the Revised Project and the alternatives taking into account the impacts that would occur from the construction, operation, and maintenance of a complete alternative route. Refer to response D1-9.

D2-99 As stated in response D2-99, the analysis of the alternative segment in combination with the remainder of the Revised Project, is provided in Chapter 6: Comparison of Alternatives. As an example, impacts from construction of Alternatives 1 and 2 are identified as greater than the Revised Project for Impact Traffic-a.

D2-100 The I-15 Corridor Specific Plan is analyzed with respect to the Revised Project in Section 4.9: Land Use and Planning under Impact Land Use-b, and the cumulative impacts of the individual projects within the specific plan are analyzed in Chapter 5: Cumulative Impacts. All plans and planning documents used in the Subsequent EIR to establish baseline conditions and cumulative project lists are identified in the Reference sections. The plans used in the cumulative analysis are identified in Section 5.2.2: Plans and Projections, and

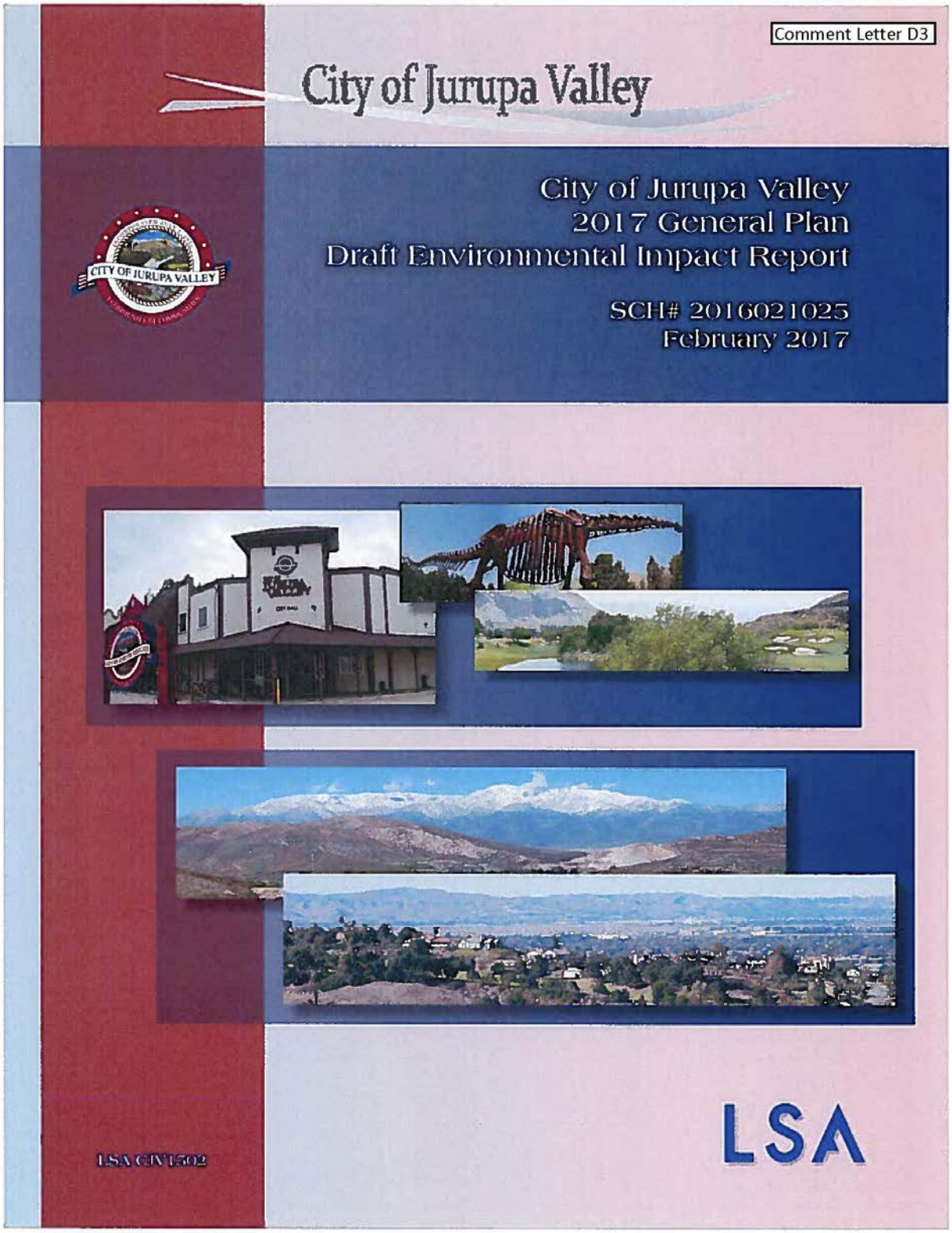
were implemented in the several analyses including air quality and biological resources.

D2-101 The comparison of impacts presented in Chapter 6: Comparison of Alternatives focused on significant impacts of each alternative. The commenter references impacts of Alternative 1 on recreation, air quality, public services, and cultural resources as greater than the Revised Project. Impacts on the resources listed are less than significant or mitigated to less than significant for both the Revised Project and Alternative 1. An EIR is required to focus on significant impacts in accordance with PRC § 21100(b)(1), CCR § 15126(a) and § 15143. If an impact is less than significant it is not a substantial adverse change to the environment as defined by CEQA, PRC § 21068 and CCR § 15382. Less-than-significant impacts are not therefore considered when comparing between alternatives. Only substantial adverse (i.e., significant) impacts are used to rank alternatives. Since all other environmental changes resulting from the project are not, by definition, significant impacts, they do not have to be addressed or considered under CEQA.

D2-102 Refer to response D1-8 for a discussion of the NOP baseline used in the Subsequent EIR. Use of a future condition as the baseline, such as following buildout of Jurupa Valley, is sometimes undertaken in CEQA analysis. Use of a future baseline requires substantive evidence. The timing and exact nature of full buildout is unknown. The Revised Project or other cumulative projects may affect the outcome of future development in unforeseen ways. As such, the use of a future baseline is considered too speculative. The commenter provides no additional substantial evidence to support why a future baseline that assumes full buildout of the land adjacent to I-15 should be used. The Subsequent EIR accurately identifies the baseline as the environmental condition at the time the NOP was issued in accordance with the CEQA Guidelines Section 15125(a).

D2-103 Refer to response D2-101 for details regarding why less than significant impacts are not used to rank alternatives.

Refer to response D2-102 for the reasoning regarding the baseline used in the EIR and why use of a future condition is inappropriate.


Comment Letter D3
City of Jurupa Valley
City of Jurupa Valley
2017 General Plan
Draft Environmental Impact Report
SCH# 2016021025
February 2017
CITY OF JURUPA VALLEY
LSA CIV1502
LSA

4.2 AGRICULTURE AND FORESTRY RESOURCES

This section discusses possible agriculture and forestry resource impacts attributable to the Proposed Plan. It describes existing agricultural resources and state farmland classifications within the Plan Area. This section focuses on applicable state, regional, and local policies regarding agricultural resources and the conversion of farmland to non-agricultural uses. The analysis contained in this section is based on the following reference documents:

- *Conservation and Open Space Element, City of Jurupa Valley General Plan,* December 2016, (draft).
- *California Land Cover Mapping and Monitoring Program and the Fire and Resource Assessment Program*, California Department of Forestry and Fire Protection (CalFire). April 2016.
- *A Guide to the Farmland Mapping and Monitoring Program,* California Department of Conservation, Division of Land Resources Protection, 2004 Edition.
- *California Land Evaluation and Site Assessment Model, Instruction Manual*, California Department of Conservation, Office of Land Conservation, 1997.

4.2.1 Existing Setting

4.2.1.1 Agriculture

According to the Conservation and Open Space Element[1]...

> "Agriculture was once the dominant land use and economic activity in Jurupa Valley. Over time, land use and economic changes have largely displaced farming, grazing, vineyards, dairy, orchards, and other agricultural activities with less urbanized areas. Reflecting this change, the last dairy in Jurupa Valley closed in 2015. However, the City continues to have areas in agricultural use, particularly along the I-15 corridor and near the Santa Ana River... Countywide, agriculture continues to contribute significantly to the overall economy. In Jurupa Valley, agriculture continues to be important as a contributor to the local economy, a key open space resource, and a defining feature of the communities' overall visual character and rural heritage. Moreover, agriculture is fundamental to the notion of "sustainability" -- it helps preserve productive soils and Jurupa Valley's capacity to grow food locally for local use."

The land within the City is underlain by a variety of soils that are suitable for many types of agriculture, especially in the flatter portions of the City adjacent to the Santa Ana River and just east of the I-15 Freeway north of the river. Most of the local soils are relatively sandy and/or loamy which comprise a deep alluvial flood plain caused by repeated flooding along Santa Ana River to the south. The more northern upland areas do not contain agricultural soils (i.e., USDA Soil Class I or II). At present the only large active agricultural activities are in the far western portion of the City adjacent to the I-15 Freeway and north of Limonite Avenue.

Utilizing data from the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) soil survey and current land use information, the California Department of Conservation (DOC), the Farmland Mapping and Monitoring Program (FMMP)[2] compiles important farmland maps for each county within the State. According to available FMMP data and mapping, the proposed General Plan area contains a total of 2,819 acres of designated farmland in the classifications shown in Table 4.2.A.

---

1 Conservation and Open Space Element, introduction to Policy COS 4, Agricultural Resources.
2 A Guide to the Farmland Mapping and Monitoring Program, California Department of Conservation, Division of Land Resources Protection, 2004 Edition.

Table 4.2.A: Designated Farmland in Jurupa Valley

Designation	Acres	Percent
Prime Farmland	612	21.7
Farmland of Statewide Importance	39	1.4
Unique Farmland	91	3.2
Farmland of Local Importance	2,077	73.7
Sub-Total	2,819	100.0
Total All Farmland Designations	2,819	10.1
Urban, Built-Up, and Other Land (i.e., non-farmland designation)	25,027	89.9
Total	**27,846**	**100.0**

Source: FMMP mapping database, website accessed July 2016

The prime farmland is mainly located in the western portion of the City (just east of the I-15 Freeway north of Limonite Avenue) and the land designated as farmland of local importance located in the west, southeast, and northeast portions of the City. The FMMP data shows 130 acres designated as farmland of statewide importance or unique farmland. The FMMP mapping designates approximately 90 percent of the City land as Urban, Built-up, and Other Land which has no agricultural use or value. Figure 4.2.1 shows the location of FMMP mapped farmland soils within the City.

4.2.1.2 California Land Conservation Act (Williamson Act)

The California Land Conservation Act of 1965, also referred to as the Williamson Act, is a non-mandated State program administered by counties and cities for the preservation of agricultural land. This program enables local governments to enter into contracts with private landowners to restrict specific parcels of land to agricultural or related open space use. In return, landowners receive much lower property tax assessments than normal because the assessments are based upon farming and open space uses rather than full market value. According to the Riverside County Farm Bureau and the County Department of Regional Planning, until recently there were two Williamson Act contracts in the City covering a total of 275 acres. They were both located just east of the I-15 Freeway and just north of the Santa Ana River but records show they were recently cancelled as part of two proposed development projects; CV Communities and Stratham Homes.

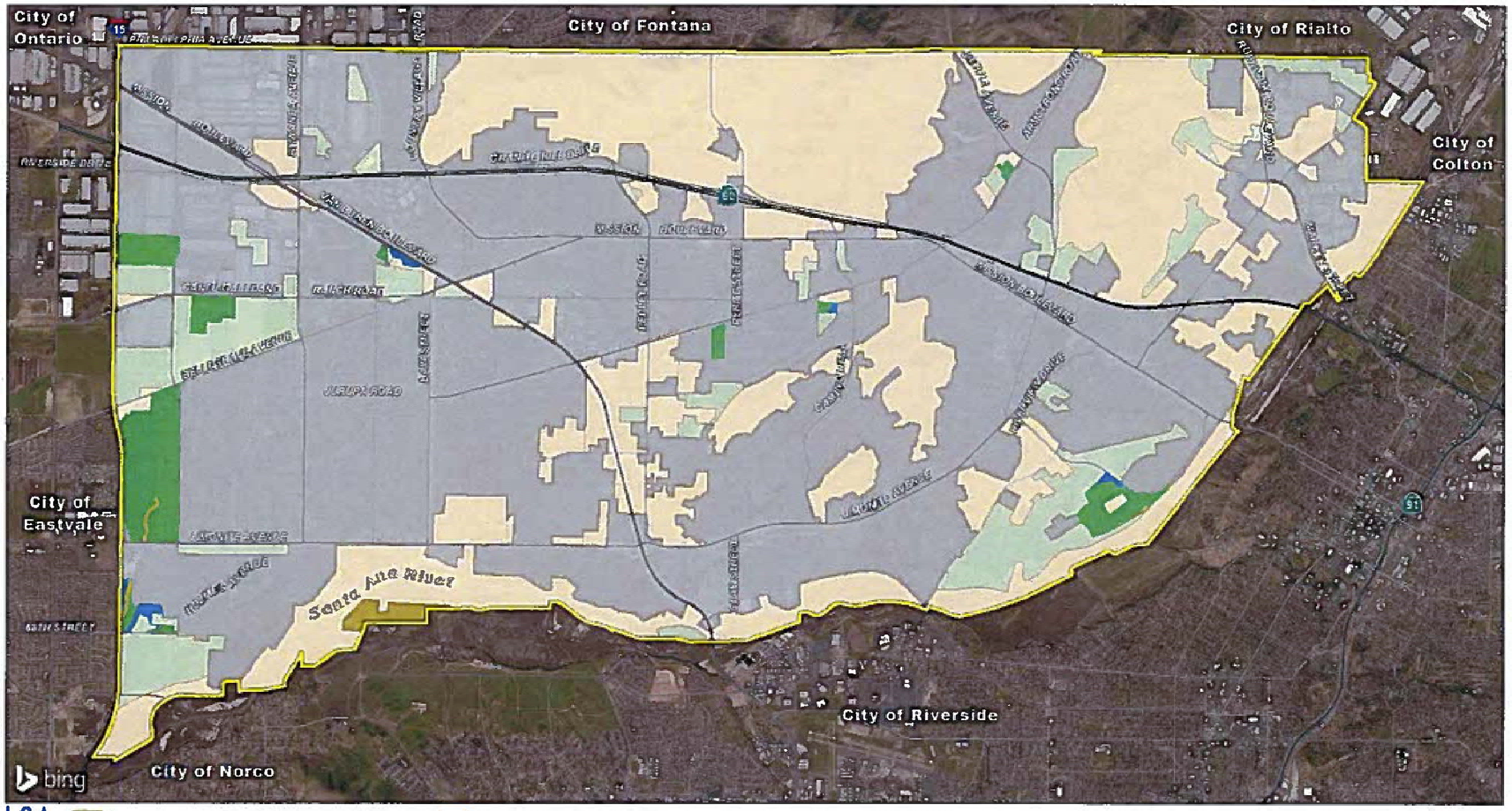
4.2.1.3 Forest Resources

The California Department of Forestry and Fire Protection (CalFire) and the U. S. Forest Service conduct land cover mapping and monitoring to enhance fire protection and natural resource management on public and private lands in California. According to the California Land Cover Mapping and Monitoring Program[1] and the Fire and Resource Assessment Program (FRAP) under CalFire, the City contains no identified forest resources, including the vegetation along the Santa Ana River. However, it should be noted that the vegetation along the northern river bank, within the City, contains a substantial number of large native and non-native trees, including eucalyptus, oak, California Pepper, cottonwood, willow, California sycamore, etc. and large assemblages of these trees are classified as "woodlands" of various types by biologists and the resource agencies (see Section 4.4.1, Vegetation).

4.2.1.4 NOP/Scoping Comments

There were no public comments during the public scoping process regarding agriculture or forest resources. However, during the General Plan preparation process, a number of residents expressed concern about the loss of agricultural land/activities.

[1] http://frap.cdf.ca.gov/projects/land_cover/


City of Ontario
City of Fontana
City of Rialto
City of Colton
City of Eastvale
City of Riverside
City of Norco
Santa Ana River
bing
LSA
City of Jurupa Valley
State Farmland Designations
D, Urban and Built-up Land
L, Farmland of Local Importance
P, Prime Farmland
S, Farmland of Statewide Importance
U, Unique Farmland
X, Other Lands
SOURCE: Bing Aerial 2015; Riverside County 7/2015, 2015.
0 2,000 4,000
Feet
Jurupa Valley 2017 General Plan Environmental Impact Report
Figure 4.2-1
Farmland in Jurupa Valley

THIS PAGE INTENTIONALLY LEFT BLANK

4.2.2 Regulatory Framework

4.2.2.1 State of California

The California Government Code (Section 65570) requires the collection and reporting of agricultural land use acreage and conversion by June 30 of each even-numbered year. Utilizing data from the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) soil survey and current land use information, the California Department of Conservation (DOC), the Farmland Mapping and Monitoring Program (FMMP)[1] compiles important farmland maps for each county within the State. Maps and statistics are produced biannually using a process that integrates aerial photo interpretation, field mapping, a computerized mapping system, and public review. These maps delineate land use in eight mapping categories (and one overlay category) and represent an inventory of agricultural soil resources within Riverside County.

California Land Conservation Act (Williamson Act). The California Land Conservation Act of 1965, also referred to as the Williamson Act, is a non-mandated State program administered by counties and cities for the preservation of agricultural land. This program enables local governments to enter into contracts with private landowners to restrict specific parcels of land to agricultural or related open space use. In return, landowners receive much lower property tax assessments than normal because the assessments are based upon farming and open space uses rather than full market value.

4.2.2.2 City of Jurupa Valley General Plan

It is the City's intent to preserve productive agricultural land wherever possible and to discourage the conversion of productive agricultural land unless there are overarching community-wide benefits from conversion of agricultural land to urban uses. The Conservation and Open Space Element of the City's 2017 General Plan, dated December 19, 2016 and made available on the City's website[2] as of January 19, 2017, contains the following goals, policies, and programs to help preserve agricultural activities within the City which are designed to provide for a smooth transition to rural or suburban uses when agricultural land is converted to non-agricultural use:

Conservation and Open Space Element

COS 1. Biological Resources

Goal

COS 1 Protect, preserve, and create the conditions that will promote the preservation of significant trees and other vegetation, particularly native California species.

Policies

COS 1.3 **Other Significant Vegetation.** Maintain and conserve superior examples of vegetation, including: agricultural wind screen plantings, street trees, stands of mature native and non-native trees, and other features of ecological, aesthetic, and conservation value.

COS 4. Agricultural Resources

Goal

COS 4 Continue to accommodate agricultural uses and encourage its expansion, where appropriate.

---

1 A Guide to the Farmland Mapping and Monitoring Program, California Department of Conservation, Division of Land Resources Protection, 2004 Edition.

2 http://jurupavalley.org/Departments/Development-Services/Planning/General-Plan. Website accessed February 1, 2017.

Policies

COS 4.1 **Support Agricultural Uses.** Employ a variety of agricultural land conservation programs to improve the viability of farms and ranches and thereby ensure the long-term conservation of viable agricultural uses in cooperation with individual farmers, farming organizations, farmland conservation organizations, and the County.

COS 4.2 **Agricultural Land Conversion**. Discourage the conversion of productive agricultural lands to urban uses unless the property owner can demonstrate overarching Community-wide benefits or need for conversion.

COS 4.3 **Compatible Uses.** Encourage the combination of agriculture with other compatible uses to help with the production of food, fiber, and support uses incidental to the on-site agricultural operation, provide an economic advantage to agriculture. In areas designated for agricultural uses, allow activities such as farm stores, retail sales of produce or wares, and related accessory uses.

Programs

COS 4.1.1 **Farmland Conservation**. Encourage individuals, non-profit agencies, and the County to seek out grants and programs that promote farmland conservation. Such measures may include land trusts, conservation easements, Williamson Act designation, Land Conservation Contracts, Farmland Security Act contracts, the Agricultural Land Stewardship Program Fund; agricultural education programs, density averaging and development standards, and/or incentives (e.g., clustering and density bonuses) to encourage conservation of productive agricultural land.

COS 4.1.2 **Sustainable Agriculture.** Encourage sustainable agricultural practices to protect the health of human and natural communities and to minimize conflicts between agriculture and urban neighbors.

In addition, the Environmental Justice Element of the 2017 General Plan contains the following goal and policy relative to agriculture in the City:

Environmental Justice Element

Goal

EJ 5 Healthy and affordable housing opportunities for all segments of the community.

Policy

EJ 4.9 **Community/Private Gardens.** Ensure that regulations allow community and private gardens where residents can grow healthy fruits and vegetables.

The Land Use Element of the 2017 General Plan also contains the following policies related to agriculture:

Land Use Element

Policies

LUE 1.3 **Prime Farmland.** Encourage conservation of designated Prime Farmland and productive agricultural lands.

LUE 1.4 **Right-To-Farm.** Adhere to the Riverside County Right-To-Farm Ordinance and any subsequent ordinance assuring the ability of farmers to continue with legally-established agricultural activities.

The Mobility Element of the 2017 General Plan also contains the following policies related to agriculture:

Mobility Element

Policies

ME 8.37 **Tree Preservation in Rights-of-Way.** Preserve mature trees with street or highway rights-of-way that are identified as superior examples of California native species or naturalized tree species.

ME 8.41 **Habitat Conservation Planning.** Incorporate specific requirements of the Western Riverside County Multiple Species Habitat Conservation Plan into transportation plans and development proposals.

ME 8.42 **Habitat Protection.** Avoid disturbance of plant and animal communities, wildlife corridors, and biotic resource areas when identifying alignments for new roadways, or for improvements to existing roadways and other transportation system improvements.

4.2.3 Thresholds of Significance

The City of Jurupa Valley has not established local CEQA significance thresholds as described in §15064.7 of the State CEQA Guidelines. For this reason, this Draft EIR incorporates the CEQA checklist included in Appendix G of the State CEQA Guidelines to determine the significance of environmental impacts. Appendix G of the *CEQA Guidelines* recognizes the following significance thresholds related to agricultural resources. Based on these significance thresholds, potential impacts to agricultural resources could be considered significant if the proposed project would:

(A) Conflict with existing zoning for agricultural use, or a Williamson Act contract;

(B) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]);

(C) Result in the loss of forest land or conversion of forest land to non-forest use;

(D) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use; and/or

(E) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural use.

4.2.4 Methodology

The methodological analysis underlying this section of the EIR consists of the following:

- First, determine if the City contains any forest or forest-related resources. If so, identify their location and potential impacts if they were to be removed/lost over time as development occurs within the City.
- Next, analyze the FMMP data to determine if portions of the City are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.
- Third, evaluate the current versus proposed General Plan land use designations and zoning applicable to agricultural land or activities within the City to determine if any conflicts exist between agriculture and zoning within the City.
- If necessary, use information from the California Land Evaluation and Site Assessment (LESA) model, developed by the State Department of Conservation, as a guide to quantify any potential impacts the Proposed Plan may have on agricultural resources. Note that the LESA model is currently considered to be the most reliable method by which to determine the potential impacts of an individual project on agricultural resources.

4.2.5 Programmatic Impact Evaluation

4.2.5.1 Existing Zoning and Williamson Act

Threshold	Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

Programmatic Impacts. Prior to incorporation, data from the Southern California Association of Governments (SCAG) and Riverside County indicate approximately 5,178.2 acres within Jurupa Valley were zoned for various kinds of agricultural uses, including Light Agriculture (A-1, A-1-4, and A-2.5 zones) and Residential Agriculture (R-A zone) as shown below:

County Zone	Acres
A-1	3,962.26
A-1-1	106.67
A-1-1/2	186.73
A-1-10	83.15
A-1-2	8.12
A-1-4	297.01
A-1-5	294.98
A-2	7.12
A-2-10	142.33
A-2-20	30.78
A-2-5	50.63
A-P	8.44
Total	**5,178.22**

The 2017 General Plan includes agricultural lands under the "Open Space, Rural" land use category. Most residents and land owners have expressed a strong desire for land in the City to be designated for suburban-type used, but ongoing agricultural activities should be encouraged to continue as long as the land owner desires it and if they are economically feasible. Once the General Plan is adopted, it will no longer conflict with the County agricultural zoning because the City will no longer have any agricultural zones.

According to County records until recently there were two properties in the southwest portion of the City that have Williamson Act contracts on them, totaling approximately 275 acres. However, records show they were recently cancelled as part of two proposed development projects; CV Communities and Stratham Homes. The Williamson Act requires a ten year phase out of its agricultural preserve status and there are severe tax penalties for early withdrawal from the Act program. Due to the small amount of property covered by the Act in the City, and the existing state regulatory process and restrictions regarding this specific land use designation, potential impacts regarding the Williamson Act will be less than significant, and no mitigation is required.

Evaluation of General Plan Goals and Policies. The following goals, policies, and programs of the 2017 General Plan are specifically related to agriculture and related resources:

Conservation and Open Space Element

Goal

COS 1 Preserve significant trees and other vegetation, particularly native California species.

Policy

COS 1.3 Maintain and conserve superior examples of vegetation.

Goal

COS 4	Accommodate and encourage expansion of agricultural activities.

Policies

COS 4.1	Use agricultural land conservation programs to improve the viability of farms.
COS 4.2	Discourage the conversion of productive agricultural land.
COS 4.3	Encourage placement of uses compatible with agriculture on adjacent land.

Programs

COS 4.1.1	Encourage landowners to use farmland preservation and protection programs.
COS 4.1.2	Encourage sustainable agricultural activities to minimize land use conflicts.

Environmental Justice Element

Goal

EJ 5	Provide healthy and affordable housing.

Policy

EJ 4.9	Allow community/private gardens so residents can grow their own food.

Land Use Element

Policies

LUE 1.3	Encourage conservation of Prime Farmland and productive agricultural lands.
LUE 1.4	Adhere to the Riverside County Right-To-Farm Ordinance.

Implementation of the above General Plan goals, policies, and programs as future development occurs will help ensure that potential impacts to agricultural zoning and the Williamson Act within the City will be less than significant. The most important goal in this regard will accommodate and encourage expansion of agriculture where practical and desired by the landowner (Goal COS 4) supported by Policy 4.3 which discourages land uses that are incompatible with existing agriculture, and Programs 4.1.1 and 4.1.2 to help local landowners protect agriculture when they wish. Finally, Land Use Element Policies LUE 1.3 and 1.4 clearly indicate prime farmland and the right-to-farm should be protected in the City. It should be noted that the term "development" in this policy applies to building improvements on both private and public actions involving vacant land.

Level of Programmatic Impact Before Mitigation. The General Plan goals, policies, and programs outlined above will provide sufficient transition of agricultural land to rural and suburban land uses, and potential impacts to agricultural zoning and the Williamson Act will be less than significant.

Programmatic Mitigation Measures. No mitigation needed or feasible (see Section 4.2.5.4, *Potential Project-Level Mitigation*).

Level of Programmatic Impact After Mitigation. With implementation of the identified General Plan goals, policies, programs, potential impacts to agricultural resources from development within the City will be less than significant and no mitigation is feasible.

4.2.5.2 Forest Land Zoning

Threshold	Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Programmatic Impacts. Public Resource Code Section 12220(g)) defines forest land as:

> "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."

According to the California Department of Forestry and Fire Protection (CalFire), there are no areas designated as forest land or timberland within the City limits, including land associated with the Santa Ana River. The river and adjacent lands do contain riparian (stream-related) vegetation, but the riparian species present in these areas are not considered forestland even though they do support a number of native trees (e.g., willow, cottonwood, etc.). These lands are more accurately characterized as "woodlands" by biologists and the resource agencies, but its many trees do not necessarily constitute actual forest resources. In addition, the land along the river is classified as Public/Quasi-Public and cannot be logged or its trees harvested as part of any forest activity in any case.

Evaluation of General Plan Goals and Policies. The General Plan does not contain any specific goals, policies, or programs regarding forestland because that resource is not present in the City.

Level of Programmatic Impact Before Mitigation. Since there are no forest resources identified within the City, no significant impacts would occur to forest zoned land from the implementation of the proposed General Plan, and no mitigation is required.

Programmatic Mitigation Measures. No mitigation needed.

Level of Programmatic Impact After Mitigation. There are no forest resources within the City, so there will be no significant impacts would occur to forest zoned land from the implementation of the proposed General Plan, and no mitigation is required.

4.2.5.3 Loss or Conversion of Forest Land

Threshold	Would the project result in the loss of forest land or conversion of forest land to non-forest use?

As discussed above in Section 4.2.5.2 above, there are no areas designated as "forest lands" within the City limits. Therefore, no significant impacts would occur from the implementation of the 2017 General Plan in this regard, and no mitigation is required.

4.2.5.4 Conversion of Farmland to Non-Agricultural Uses

Threshold	Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use, or conversion of forest land to non-forest use?

Programmatic Impacts. Land within the City does currently supports approximately 3,500 acres of active agriculture and also contains over 2,000 acres of land that is underlain by soils suitable for farming (i.e. Soil Conservation Service Class I through III soils), mainly in the western and southwestern portions of the City. It is likely that at some point in time, all of these areas will covert to some type of suburban land use (e.g., residential, commercial, etc.) consistent with the goals and policies of the 2017 General Plan and as shown on the General Plan land use map. The eventual regional conversion of agricultural land to non-agricultural uses results from regional economic processes, although conversion of individual properties is a policy decision of the City based on community needs and benefits. This impact is considered a potentially significant environmental impact, although the City has included goals, policies, and programs in its General Plan to help ease

the transition of land use from agriculture to non-agricultural uses as local conditions warrant (see Section 4.2.6).

Evaluation of General Plan Goals and Policies. The following goals, policies, and programs of the 2017 General Plan are specifically related to agriculture and related resources:

Conservation and Open Space Element

Goal

COS 1 Preserve significant trees and other vegetation, particularly native California species.

Policy

COS 1.3 Maintain and conserve superior examples of vegetation.

Goal

COS 4 Accommodate and encourage expansion of agricultural activities.

Policies

COS 4.1 Use agricultural land conservation programs to improve the viability of farms.

COS 4.2 Discourage the conversion of productive agricultural land.

COS 4.3 Encourage placement of uses compatible with agriculture on adjacent land.

Programs

COS 4.1.1 Encourage landowners to use farmland preservation and protection programs.

COS 4.1.2 Encourage sustainable agricultural activities to minimize land use conflicts.

Land Use Element

Policies

LUE 1.3 Encourage conservation of Prime Farmland and productive agricultural lands.

LUE 1.4 Adhere to the Riverside County Right-To-Farm Ordinance.

Mobility Element

Policies

ME 8.37 Preserve mature trees with street or highway rights-of-way.

ME 8.41 Incorporate specific requirements of the MSHCP into transportation plans and development proposals.

ME 8.42 Provide habitat protection during transportation system improvements.

Land Use Element Policies LUE 1.3 and 1.4 clearly indicate prime farmland and the right-to-farm should be protected in the City. The goals, policies, and programs in the other cited Elements implement the community desire to provide a smooth transition from agriculture to rural and suburban land uses if landowners choose to convert their agricultural land to other uses (i.e., "highest and best use") depending on their individual and regional market conditions. Jurupa Valley was at one time largely an agricultural area with land uses that supported and were consistent with farming. This area and the surrounding communities (e.g., Eastvale, Riverside, Fontana, Ontario, etc.) have been slowly transitioning away from agriculture as their populations change and desire different types of communities. This represents a fundamental land use change over the years and a potentially adverse environmental impact at a programmatic level. The involved jurisdiction can continue to support existing agricultural uses and establishing processes for orderly transition to other uses as community-wide needs and individual and market conditions dictate.

Level of Programmatic Impact Before Mitigation. Conversion of agricultural land to non-agricultural uses will be an eventual result of implementation of the General Plan. As land that currently supports or could support agriculture is developed, there will be less and less agricultural activity in the City. The City's General Plan reflects the community's desire that agriculture remain viable and active as long as it is economically practical and local landowners wish to farm. The General Plan clearly states one of its goals is to provide a transitional process away from agriculture toward rural and suburban land uses. This will eventually result in fundamental land use change for the area, and this is considered a potentially significant environmental impact. At a programmatic level, there are no feasible mitigation available for this transitional process other than implementation of the outlined General Plan goals, policies, and programs. This represents a significant impact relative to conversion of farmland to non-agricultural uses.

Programmatic Mitigation Measures. No mitigation feasible (see below).

Potential Project-Level Mitigation. The following information provides context for the programmatic nature of the General Plan versus project-level mitigation that is typically suggested by conservation groups when evaluating environmental impacts of a General Plan.

Consideration has been given to the formation or contribution to an agricultural mitigation bank as potential mitigation for the eventual loss of agriculture in Jurupa Valley. The County of Riverside considered the establishment of an Agricultural Mitigation Bank to mitigate the loss of farmland during the adoption process of the Riverside County General Plan in 2003; however, purchase of credits in such a bank to mitigate the loss of agricultural lands as part of the Draft EIR for the County General Plan (refer to Mitigation Measures 4.2.2A, B, and C in the Draft EIR of the Riverside County Integrated Project) were specifically removed from the General Plan during the public hearings on the General Plan.[1] Since potential mitigation for regional loss of agriculture has already been considered and rejected by the County, such mitigation would be even less feasible on a city-wide only basis.

In 2009, a regional agricultural conversion report was prepared by CBRE Consultants[2] for a private development project in the City of Perris. The CBRE report concluded that the agriculture industry will continue to decline in the Inland Empire and identified three main reasons for the decline: 1) the more affordable housing market in the region compared to Los Angeles and Orange Counties, 2) the competition for cheaper farm labor from areas like the South Central Valley, and 3) lower water allocations to agriculture because of the growing urban population that receives priority for the water. The reports also noted that the agriculture industry within the Inland Empire is very small, making up only 4.1 percent of California's total agricultural industry and only 1 percent of the regional economy in 2010. There is a clear pattern of agricultural decline from 2006 to 2010. Over these four years, 24,000 acres of farmland were removed in the Inland Empire to make way for of urban land uses. Agricultural production levels were 28 percent lower in 2010 than they were in 2004. The combination of the small size of the Inland Empire's agricultural industry and the three key economic constraints caused this study to conclude that the agriculture industry in the Inland Empire is in decline. Under these circumstances, no mitigation that would artificially preserve or prolong agricultural activities (i.e., other than current market forces) in the Plan Area would be feasible or necessary.

Therefore, there are no feasible mitigation measures to preserve agriculture on a permanent basis within the City as a regional benefit, however, the Conservation and Open Space Element does have goals, policies, and programs to help support agricultural activities in the City as long as feasible, and to help acknowledge the importance of local farming tradition in the Jurupa Valley community for future generations by encouraging the preservation of the City's agricultural history, such as historic agricultural buildings, hedgerows, farms, and ranches.

[1] Riverside County Integrated Project website, http://www.rcip.org/ , accessed December 5, 2014.
[2] Economic Viability of Agriculture in the East Inland Empire. CBRE Consulting. 2009.

Level of Programmatic Impact After Mitigation. With implementation of the General Plan goals, policies, and programs regarding agriculture, environmental impacts of the General Plan in relation to conversion of farmland will be significant, and no feasible mitigation is available.

4.2.5.5 Loss of Prime Farmland

Threshold E	Would the project result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural land use?

Programmatic Impacts. According to available FMMP data and mapping, the proposed General Plan area contains approximately 612 acres of land designated "prime farmland" and 2,077 acres designated farmland of local importance. In addition, the City contains 91 acres of unique farmland and 29 acres of farmland of statewide importance. The prime farmland is mainly in the western portion of the City (just east of the I-15 Freeway north of Limonite Avenue) and the land designated at farmland of local importance is located in the west, southeast, and northeast portions of the City. The FMMP mapping designates 90 percent of the City land as Urban, Built-up, and Other Land which has no agricultural use or value. This land will eventually be converted to non-agricultural uses as development occurs. It should be noted these designations are similar to those identified in the County General Plan for the Jurupa Valley area, although some of the areas have County zoning designations that do allow agriculture (A-1-5, A-1-20, etc.). Under the County General Plan, the lands in the City, including those that were used or designated for agriculture, would have eventually converted to suburban land uses as farming became less and less economically feasible over time. The City 2017 General Plan reclassifies Agricultural Uses as Open Space, Conservation Uses and does not include any specific agricultural or farming-related land use designations, but the General Plan policies outlined below encourage continued farming as practical and establish procedures for transition of agricultural uses to suburban land uses as economic forces allow. Agriculture and agricultural uses shall be permitted in the Open Space, Recreation (OS-R), Open Space, Conservation (OS-C) and Open Space, Rural (OS-RUR) land use designations.

In addition, data from the federal Natural Resource Conservation Service (NRCS, previously the U.S. Soil Conservation Service or SCS) Web Soil Survey indicates that approximately 14,159 acres of land within the City contain soils that are considered "prime" farmland (SCS Classes I through III). The conversion of farmland to non-agricultural uses was analyzed in Section 4.2.5.4 and was determined to be a less than significant environmental impact. Future development in the City will eventually cover over thousands of acres of land underlain by prime SCS agricultural soils and 612 acres of land designated as "prime farmland" with various types of rural and suburban land uses. Once these lands are covered over, they would be considered "lost" or unavailable for farming for the foreseeable future. This transition or loss is anticipated in the City's General Plan, and is an inevitable result of achieving other General Plan goals for Jurupa Valley. Nonetheless, this loss of prime farmland represents a significant environmental impact under CEQA.

Evaluation of General Plan Goals and Policies. The following goals, policies, and programs of the 2017 General Plan are specifically related to agriculture and farmland resources:

Conservation and Open Space Element

Goal

COS 4	Accommodate and encourage expansion of agricultural activities

Policies

COS 4.1	Use agricultural land conservation programs to improve the viability of farms
COS 4.2	Discourage the conversion of productive agricultural land
COS 4.3	Encourage placement of uses compatible with agriculture on adjacent land

Programs

COS 4.1.1	Encourage landowners to use farmland preservation and protection programs
COS 4.1.2	Encourage sustainable agricultural activities to minimize land use conflicts

Land Use Element

Policies

LUE 1.3	Encourage conservation of Prime Farmland and productive agricultural lands.
LUE 1.4	Adhere to the Riverside County Right-To-Farm Ordinance.

Level of Programmatic Impact Before Mitigation. Land Use Element Policies LUE 1.3 and 1.4 clearly indicate prime farmland and the right-to-farm should be protected in the City. It should be noted that the term "development" in this policy applies to building improvements on both private and public actions involving vacant land. However, eventual conversion or loss of agricultural land will be an eventual result of implementation of the 2017 General Plan. As land that currently supports or could support agriculture is developed, there will be less and less agricultural activity in the City. The City's 2017 General Plan reflects the community's desire that agriculture remain viable and active as long as it is economically practical and local landowners wish to farm. The 2017 General Plan clearly states one of its goals is to provide a transitional process away from agriculture toward rural and suburban land uses.

The previous Section 4.2.5.4 concluded this was a fundamental land use change for the area but was not considered a significant environmental impact. At a programmatic level, there are no mitigation measures needed for this transitional process other than implementation of the outlined General Plan goals, policies, and programs. That section concluded the conversion of farmland to non-agricultural use was a less than significant impact and no mitigation is required.

Conversely, this section concludes that the physical loss of prime agricultural soil (i.e., covering then over with non-agricultural uses) represents a significant environmental impact that cannot be mitigated under the proposed General Plan, mainly because the State Department of Conservation considers these soils to be important state-wide resources and has indicated they believe their loss to be a significant impact under CEQA.

Programmatic Mitigation Measures. No feasible mitigation available (see previous Section 4.2.5.4, *Potential Project-Level Mitigation*).

Level of Programmatic Impact After Mitigation. Implementation of the General Plan goals, policies, and programs regarding agriculture will not reduce environmental impacts related to loss of prime agricultural soils to less than significant levels, and there is no feasible mitigation for this eventual loss (e.g. no long-term preservation programs for agriculture).

4.2.6 Cumulative Impacts

Cumulative impacts refer to incremental effects of an individual project when viewed in connection with the effects of past projects, current projects, and probable future projects. In this case, the proposed project or action is the City's 2017 General Plan, which by its very nature is an assessment of various potential cumulative impacts from future development. Under the General Plan, the City will experience incremental conversion of vacant land in various locations of the City based on market conditions over the years. CEQA typically requires a cumulative analysis using a "list' of cumulative projects or a "plan summary" of long-term development impacts. In this case, the growth projections of the General Plan represent the "plan summary" for the purposes of characterizing cumulative impacts related to General Plan implementation.

The projected growth conditions in the City by 2035 include conversion of a total of 4,494 acres of vacant developable land to various rural and suburban uses which is 16.1 percent of the total City

area. If development occurs at a regular pace, that would equal roughly 236.5 acres or 5 percent per year for approximately 19 years (2016 to 2035). Future growth is expected to add a maximum of 14,332 new residential units and maximum of 36.6 million square feet of new non-residential building (see Tables 3.A through 3.C in Section 3, *General Plan Components, Projected Growth*). It should be noted that the General Plan growth projections assumed eventual buildout or conversion of vacant land (including agricultural land) within the City to non-agricultural uses. However, this transition is expected to occur over many years, and may not even be completed within the 19-year horizon of the current General Plan (2017 to 2035). The General Plan anticipates a gradual transition or loss of agriculture, but such a transition will eventually occur.

The universe for cumulative agricultural and forest resource impacts is western Riverside County. The western portion of the County is generally transitioning away from agriculture, while the eastern portion of the County (e.g., Coachella Valley) is more largely rural and still supports extensive agriculture. The State Department of Conservation, Office of Land Conservation, publishes a Farmland Conversion Report every two years as part of its Farmland Mapping and Monitoring Program. These reports document land use conversion by acreage for each California county. The most recent data are for the 2008–2010 period, during which Riverside County experienced a net loss of 3,300 acres of Prime Farmland, 567 acres of Farmland of Statewide Importance, 1,742 acres of Unique Farmland, and gained 721 acres of Farmland of Local Importance (total loss equals 4,888 acres). The loss of hundreds of acres of land designated as "prime farmland" represents an incremental but significant loss of prime agricultural soils in Riverside County. Therefore, the proposed General Plan will result in a **significant cumulative impact** due to its contribution to regional losses of agriculture and farmland. It will not make a similar contribution to any loss of forestland within the County because the City does not have any designated forest resources.

THIS PAGE INTENTIONALLY LEFT BLANK

3.5.3 Response to Letter D3: SCE

There are no comments included in D3.