

Midbust, Jessica

From: Dauler, Heather <Heather.Dauler@CityofPaloAlto.org>
Sent: Tuesday, May 31, 2016 2:27 PM
To: VIG/ASP
Subject: BAMx Comments on VIG/ASP Draft EIR [WARNING: SPF validation failed]
Attachments: BAMx Comments on Alberhill Project DEIR_053116.pdf

Follow Up Flag: Follow up
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Good afternoon:

Attached, please find comments from the Bay Area Municipal Transmission Group (BAMx) regarding the Draft Environmental Impact Report (DEIR) for the Southern California Edison (SCE) Alberhill Systems Project. | 47-1

Thank you,



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**BAMx Comments on Draft Environmental Impact report for the
Southern California Edison Alberhill Systems Project (Application
No. A.09-09-022)**

Submitted by	Company	Submitted to	Date Submitted
<i>Debbie Lloyd Utilities Compliance Manager City of Palo Alto Utilities debra.lloyd@cityofpaloalto.org 650.329.2369</i>	<i>City of Palo Alto Utilities (CPAU)</i>	<i>CPUC c/o RE: VIG/ASP Draft EIR c/o Ecology and Environment, Inc. VIG.ASP@ene.com</i>	<i>May 31, 2016</i>

Bay Area Municipal Transmission group (BAMx)¹ appreciates the opportunity to provide comments to the California Public Utilities Commission (CPUC) on the Draft Environmental Impact Report (DEIR) for the Southern California Edison (SCE) Alberhill Systems Project and Valley–Ivyglen 115-kilovolt (kV) Subtransmission Line Project. BAMx’s comments are specifically applicable to the Alberhill Systems Project (Proposed Project).

47-2

Background²

The California Independent System Operator (CAISO) approved the Proposed Project as a reliability-driven project in its 2009-10 Transmission Planning Process (TPP). Its need was driven by the anticipated load growth in the southwestern Riverside County area at that time, which is served by the Valley Substation. The Valley 115-kV transmission system serving the area load is divided into two separate 115-kV transmission systems: Valley North and Valley South. Each of the 115-kV systems is served by two 560 MVA 500/115 kV transformers. There appear to be no transmission facilities that connect the Valley North and the Valley South systems.

47-3

SCE projected that by 2014³, the load served by Valley South system would exceed the combined capabilities of the two 500/115 kV transformers under normal conditions⁴ and thus system reinforcements

¹ BAMx consists of Alameda Municipal Power, City of Palo Alto Utilities, City of Santa Clara, Silicon Valley Power, and Port of Oakland.

² The analysis in this report is based on two documents. The first document is contained SCE’s Proponent’s Environmental Assessment (PEA) for the Alberhill Systems project, dated September 30, 2009, <http://www.cpuc.ca.gov/Environment/info/ene/alberhill/PEA%20Alberhill%20Vol.%201%20of%202.pdf>. The second document was presented to the CAISO Board for the approval of the Proposed Project, titled, “Decision on Alberhill Substation Project,” dated December 9, 2009, <http://www.caiso.com/2480/2480a98f36460.pdf>.

would be needed. The Proposed Project includes building a new Alberhill 500/115 kV Substation with two 500/115 kV transformers (the ultimate configuration will have four transformers, three for load carrying and one spare for emergency), looping the existing Serrano-Valley 500-kV line into the new Alberhill Substation, constructing a new 115-kV line and upgrading four existing 115-kV lines. SCE also evaluated other alternatives including the two alternatives below:

1. Install an additional 500/115 kV transformer at Valley Substation. SCE rejected this alternative citing that there was no room at the Valley Substation for an additional transformer and it is impossible to expand the Valley Substation.
2. Transfer load from Valley South system to Valley North system. SCE rejected this alternative because it is a short term solution.

47-4

The CAISO Board memo, dated December 9, 2009, estimated that the Proposed Project would cost \$315 million.

BAMx Assessment

DEIR Includes Inappropriate Objective of Constructing a New 500/115-kV substation

The DEIR includes the following as one of the objectives of the Proposed Alberhill Project.⁵

- Construct a new 500/115-kV substation within the Electrical Needs Area that provides safe and reliable electrical service pursuant to NERC and WECC standards

47-5

BAMx does not believe it is appropriate to indicate one particular solution as an objective to solve a specific reliability issue.

Declining Forecast of Future Loads Reduces the Need for the Proposed Project

The Proposed Project is based upon addressing the reliability problem caused by the projected high load growth in the Valley South area. However, if the load growth is smaller, in line with the rest of the SCE system, then the rejected alternatives should be reconsidered.

The figure below compares the historical (recorded) peak load of the Valley South system with the 1-in-5 year peak load projected in the SCE PEA⁶ as well as the DEIR⁷. This figure highlights that the SCE 2009 1-in-5 peak load forecast (green line) is consistently higher than the latest projected 1-in-5 peak demand

³ The two documents discussed in footnote 1 above have different load forecasts. The SCE PEA indicated that the overload would occur on 2011 (See SCE PEA, Table 1.1 Valley South 115-kV System Capacity and Peak Demand. P. 1-6), while the CAISO document indicated the overload would occur on 2014.

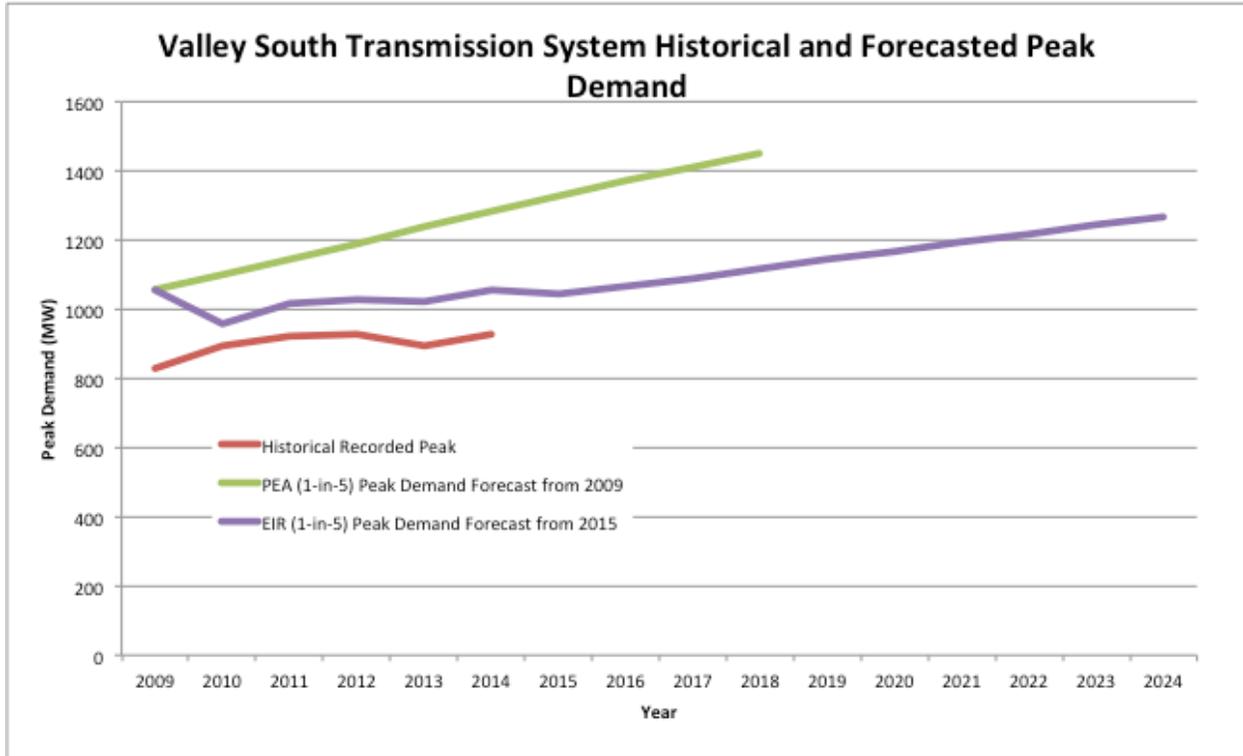
⁴ SCE has installed a spare 500/115 kV transformer at Valley Substation for emergency conditions.

⁵ DEIR p. 1-10.

⁶ Proponent's Environmental Assessment Alberhill System Project, p. 1-6

⁷ DEIR, p. 1-7.

reported in the DEIR (purple line). It would therefore be erroneous to use the SCE 2009 1-in-5 peak load forecast for planning purposes when newer information is available.



47-6

The combined Valley North and Valley South load in 2020 as projected in the CAISO 2015-16 TPP is 1,911 MW⁸. The capability of the four 500/115 kV transformers in the Valley Substation is 2,240 MW. So there is adequate transformer capacity left for load growth. Based upon the latest load forecast, the alternative of shifting load between Valley North and Valley South should be considered as a much longer-term solution than SCE has argued in the PEA. To our knowledge, SCE has not optimized the load shifting process. The 300 MW of unused transformer capacity should be sufficient at least through 2025.

Furthermore, under SB 350, Additional Achievable Energy Efficiency (AAEE) will have a significant role to play in reducing the energy demand. SB 350 also encourages additional preferred resources, especially demand response, to meet the State's 50% RPS goal, the impact of which would likely be reflected at the load centers in the Riverside County. Since the Proposed Project is justified based on the growing loads in the Valley South area, the Commission should take into account this recent development while deciding on the need for the Proposed Project.

47-7

⁸ CAISO 2015-16 TPP: SCE Summer Peak Metro power flow case.

SCE Needs to Model the 115-kV Network

The Final EIR should provide a load flow analysis of both the Valley North and Valley South networks with all the associated transmission equipment. SCE did not model the Valley South 115-kV network in the load flow cases used to conduct CAISO’s annual transmission planning process⁹. Instead of modeling the 11 substations and the corresponding circuits, only one substation with the equivalent load was modeled. Without having the 115-kV network modeled in the load flow base cases, it is impossible to assess the need for either the Valley-Ivyglen project, the 115-kV reinforcements associated with the Proposed Project, or the capability to shift the load from the Valley South to the Valley North transformers.

47-8

Need to Fully Evaluate Less Environmentally Impactful Project Alternatives

BAMx appreciates the CPUC efforts to evaluate various project alternatives in order to identify the one with the least environmental impact. BAMx has also identified additional alternatives that could meet the goals identified in the DEIR. These alternatives are expected to have less of an environmental impact and cost less than the Proposed Project. The BAMx-proposed alternatives are listed in the subsections below. Implementing these alternatives in conjunction with the Valley-Ivyglen 115-kV network project would potentially help solve the loading issues identified on the Valley 500kV transformer banks. BAMx urges the final EIR to evaluate these alternatives in addition to the alternatives already evaluated in the DEIR.

47-9

Transfer Load from Valley South to Valley North

The alternative of transferring load from Valley South to the Valley North substation should be considered in the DEIR. Based on the loads shown in the CAISO 2015-16 TPP power flow case (SCE 2020 Summer Peak), it might be feasible to transfer up to 240MW of load from Valley South to Valley North without overloading the Valley North transformers.

47-10

Connecting Valley North and Valley South Networks on the 115-kV Side

BAMx urges the Commission to explore the option of interconnecting Valley North and Valley South Networks in the final EIR. This option is likely to be less environmentally impactful than the Proposed Project and will likely cost less than the Proposed Project. Also, interconnecting the 115-kV networks would increase the overall reliability of the load served from the substations connected to the 115-kV networks.

47-11

Expanding the Valley Substation

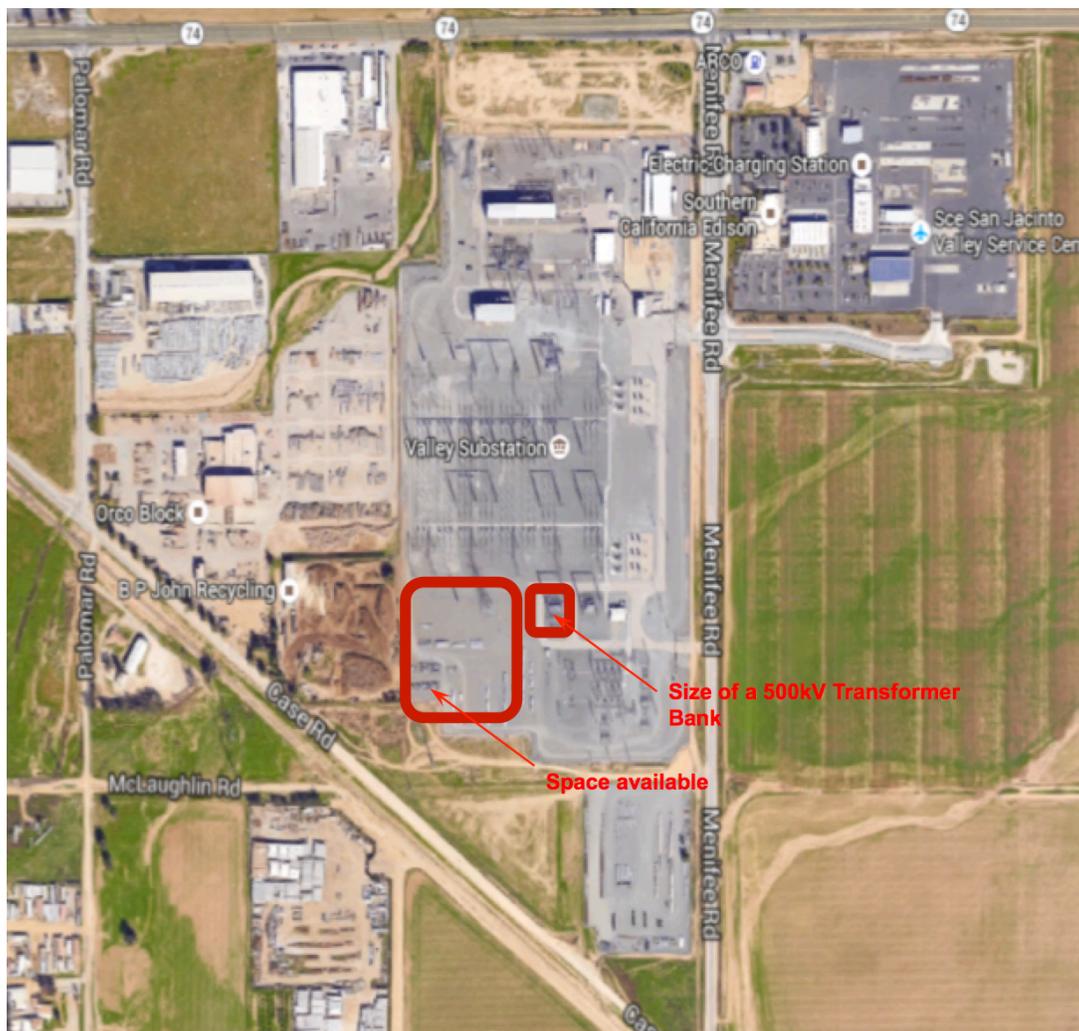
SCE has argued that there was no room in the Valley Substation to accommodate another transformer. However, the DEIR does not include any independent assessment of SCE’s claim. BAMx requests the Commission to consider another alternative of expanding the Valley South substation to include an additional transformer to be evaluated in the final EIR. The DEIR states that the spare 500/115kV transformer at the Valley South substation will be placed in-service as a temporary solution in case the Alberhill substation project is not built before the loading of Valley South network exceeds the capacity

47-12

⁹ CAISO 2015-2016 TPP, SCE Summer Peak Base Cases.

of two existing transformers at the Valley South substation¹⁰. If SCE implements this temporary solution and adds an additional spare at the Valley South substation, that alternative would be less costly and less environmentally impactful than the construction of a new substation. Outages on 500kV transformers are extremely rare and if there is a spare transformer available on site, the loss of load exposure should be about the same as compared to the Proposed Project.

SCE has previously stated that they are unable to extend the Valley Substation due to the roads surrounding the substation. The geographical drawing shown below shows that there is land available to the south and to the west of the substation. Also, there might be an empty breaker bay where the new transformer can interconnect. SCE's claims that it cannot extend the existing substation need to be investigated.



47-13

¹⁰ Draft EIR, Introduction (pp. 1-5)

Conclusion

BAMx appreciates the opportunity to provide these comments to the Commission. It is imperative that the state's electricity infrastructure provide safe and reliable electricity to the state's homes and businesses. However, in doing so, it is critical that all proposed applications are presented to the Commission for complete review in a manner consistent with the Commission's general orders and rules, and that the state's ratepayers not be burdened with costs for facilities and projects that are not necessary.

47-14

Midbust, Jessica

From: Richard J. MacHott, LEED Green Assoc. <rmachott@Lake-Elsinore.org>
Sent: Thursday, July 14, 2016 11:57 AM
To: VIG/ASP
Cc: Grant Taylor; Grant Yates; Nicole Dailey, MBA
Subject: DEIR for Valley-Ivyglen Subtransmission Line Project and Alberhill System Project
Attachments: Alberhill Project and Valley-Ivyglen DEIR comment letter 071316.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

California Public Utilities Commission
RE: VIG/ASP
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

To whom it may concern:

Please find attached the City of Lake Elsinore's comments regarding the Comments to Draft Environmental Impact Report for Southern California Edison's Alberhill System Project (CPUC Application A.09-09-022) and Valley-Ivyglen Subtransmission Line Project (CPUC Application A.07-01-031). The original letter is being mailed to you.

By return e-mail, please confirm receipt of our comment letter.

Richard J. MacHott, LEED Green Assoc.
Planning Manager
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July 13, 2016

California Public Utilities Commission

RE: VIG/ASP

c/o Ecology and Environment, Inc.

505 Sansome Street, Suite #300

San Francisco, CA 94111

Re: *Comments to Draft Environmental Impact Report for Southern California Edison's Alberhill System Project (CPUC Application A.09-09-022) and Valley-Ivyglen Subtransmission Line Project (CPUC Application A.07-01-031)*

To whom it may concern:

The City of Lake Elsinore ("City") has reviewed the Draft Environmental Impact Report ("DEIR"), State Clearinghouse Nos. 2008011082 and 2010041031, which was prepared in connection with two Southern California Edison ("SCE") proposals in Lake Elsinore and surrounding communities.

SCE's Alberhill System Project (California Public Utilities Commission ["CPUC"] Application A.09-09-022) (the "Alberhill Project") will consist of construction of the proposed Alberhill Substation along with the above-ground installation of approximately 21 miles of 115-kilovolt (kV) transmissions lines weaving through some of Lake Elsinore's most heavily traveled thoroughfares, including Mission Trail, Malaga Street, Casino Drive, Auto Center Drive, Third Street, Pasadena Street, Nichols Road, and Lake Street in proximity to established commercial zones and residential neighborhoods.

SCE's second proposal, the Valley-Ivyglen Subtransmission Line Project (CPUC Application A.07-01-031) (the "Valley-Ivyglen Project") will enter the City at State Route 74 just east of Interstate 15 and, like the Alberhill Project, will wind its way along Third Street, Pasadena Street, Nichols Road, and Lake Street and impact those areas with a dual set of transmission lines standing side by side 100 feet in the air. The Alberhill Project and the Valley-Ivyglen Project are collectively referred to as the "Proposed Projects."

SCE is to be commended for its commitment to ensuring that Lake Elsinore and the surrounding communities are adequately served with both sufficient resources to serve future growth and system redundancy to ensure greater reliability. However, SCE's obligation to serve its customers is not singular. Its role is not simply to supply electricity; it must diligently assure that its facilities not blight already-impacted communities and, perhaps more importantly, it must

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recognize opportunities to improve communities by thoughtfully investing in undergrounding transmission lines.

The City believes that the DEIR fails to comply with the requirements of the California Environmental Quality Act ("CEQA") (Pub. Res. Code §§ 21000, *et seq.*), and the State of California Guidelines for the California Environmental Quality Act ("Guidelines") (14 Cal. Code Regs. §§15000 *et seq.*). Accordingly, the City requests that CPUC suspend any further consideration of the Alberhill Project and the Valley-Ivyglen Project until a DEIR that fully discloses and analyzes the potential impacts of the Proposed Projects, fully considers feasible alternatives (including alternative locations and alternative technologies), and fully complies with all other CEQA requirements has been prepared and recirculated for public review and comment.

248-1

A. The DEIR for the Projects is Inadequate.

The DEIR fails to satisfy the requirements of the CEQA on the following grounds, as addressed in detail below: (1) inadequate aesthetics impact analysis; (2) inadequate hazards impact analysis of EMF; (3) inadequate hazard analysis related to the Skylark Field Airport; (4) inadequate socioeconomics impact analysis; (5) environmental justice concerns; and (6) inadequate alternatives analysis. As a result of these failings, major revisions to the DEIR are necessary to comply with CEQA and require recirculation.

1. *Aesthetic Impacts within the City of Lake Elsinore.*

The DEIR analysis of aesthetic impacts is not merely inadequate; it is fundamentally flawed. The drafters of the DEIR have simply failed to appreciate the Proposed Projects before the CPUC and the impacts on the Lake Elsinore environment. The DEIR creates a paradigm largely guided by the sense that the only visual impacts associated with the Proposed Projects is how they are viewed from the Interstate 15 freeway and State Route 74 and, having adopted that paradigm, employs the Federal Highway Administration's 1988 *Visual Impact Assessment for Highway Projects*. With over 11 miles of power lines to be added within the City's municipal boundaries, the DEIR presents a paltry 15 key viewpoints, focusing on views from the freeway or busy State Route 74. And yet virtually none of the proposed powerlines within the City will be within the Interstate 15 or State Route 74 rights of way. Indeed, the Proposed Projects here are simply ill-suited for analysis using criteria developed for the federal interstate system. The projects barely touch the Interstate 15 right of way. Instead, the Proposed Projects' impacts are felt in Lake Elsinore on a distinctly local level.

248-2

Sorely missing from the DEIR's aesthetic analysis are key viewpoints from streets within the City in which there are no existing overhead powerlines but that will now have such lines, streets that have overhead lines on one side of the street that due to project development will have lines on both sides of the street, and streets that have existing modest powerlines capable of future undergrounding at a reasonable cost that will now be burdened with a set of dual powerlines foreclosing a financially viable potential for future undergrounding.

In the few instances in which the DEIR actually discloses visual impacts, that disclosure shows marked indifference to local impacts within the City. The DEIR's analysis of Key Viewpoint 8 exemplifies this approach. The City of Lake Elsinore carefully conditioned the retail and commercial centers bordered by Third Street and Pasadena Street to underground utilities, as demonstrated by the retail center shown in Key Viewpoint 8 at the corner of Central and Pasadena. Those commercial and retail businesses have thrived in this modern business center which meets the aesthetic expectations of both its owners, their patrons, and the community. The Proposed Projects lay waste to those expectations as both projects will run 100-foot poles and powerlines down Third Street and the entire length of Pasadena (ASP 3/VIG 4.)

Despite the City's efforts to successfully implement development of modern communities and retail centers in which utilities are routinely undergrounded as exemplified on Pasadena Street, the DEIR response in effect says: "we don't think anyone will notice these powerlines." Using the above-referenced federal guidelines for interstate freeways and scenic highways, the DEIR concludes that visual impacts in the City's prime business park are somehow "moderately low because it is experienced mostly by people working or traveling in the area for work or personal business." (p.4.1-22)

248-3

This disconcerting bias against impacts experienced by both local businesses and the local community is further exemplified in "moderately low" visual sensitivity attributable to the installation of taller power lines on Mission Trail "because it is experienced on a regular basis by a moderate number of viewers consisting primarily of local residents, workers, commuters, and people engaged in shopping and business activities who would not have a high concern for visual changes." (Key Viewpoint 13, p. 4.1-24) If the drafter of the DEIR so readily dismisses the sensibilities of residents, workers, commuters and persons engaged in commerce within the City; whose sensibilities are left to consider when assessing visual impacts?

248-4

Indeed, if the drafter of the DEIR is to be believed, any aesthetic appeal to undergrounding utilities in neighborhoods and commercial centers is simply

illusory. Those users, according to the DEIR, will simply not notice above-ground powerlines. This point of view stands in stark contrast to the development expectations of virtually every city within the State which routinely mandate undergrounding of utilities in new subdivisions and commercial centers. That undergrounding is performed without question or dispute because undergrounding of utilities is consistent with the community's development expectation along with the expectation of property owners, their tenants, visitors and patrons who have grown to place a premium on development aesthetic.

248-5

Why has the DEIR so profoundly missed the mark on aesthetic impacts? Because it utilizes an utterly outdated aesthetic standard—now 28 years old—that even the notoriously glacial Federal Highway Administration has abandoned. The Federal Highway Administration's 2015 replacement *Guidelines for the Visual Impact Assessment of Highway Projects* acknowledge that the 1988 guidelines as simply antiquated: "The new guidelines recommend engaging the public to a higher degree than earlier [Visual Impact Assessment] VIA methods, to achieve a better understanding of how people define visual quality and how they interpret changes to it." (2015 Guidelines, p. 1-3). By failing to engage the public and instead relying on outdated (and, candidly, inapplicable guidelines for the Proposed Project), the DEIR's consistently understates the visual impact of the Proposed Projects.

248-6

The modern expectation that visual impacts will be at the forefront of new development is embodied in the City's applicable land use standards which seek to protect the character of the surrounding environment and not limit that protection to designated "scenic" view sheds as proposed in the DEIR. The City, like many municipalities, has authorized the formation of utility undergrounding districts (Lake Elsinore Municipal Code ["LEMC"] 12.16), mandated that new development underground utilities of less than 34.5 kv (LEMC 16.64), and mandated the undergrounding of utilities in specific plan districts to the extent feasible (LEMC 17.204.030.H).

248-7

The Alberhill and Valley-Ivyglen Projects will degrade the visual quality of every area of the City they touch, as the developments in those areas will be less attractive amongst the imposing pole structures and power lines. Undergrounding of these transmission lines is feasible to mitigate the significant impacts to aesthetics from the Proposed Projects. The CPUC should mandate that mitigation.

248-8

2. **Hazards to Sensitive Receptors.**

Ten schools are located within one-quarter mile of the Project. (p. 4.8-4.) Moreover, “[s]ensitive receptors are as close as 20 feet from” the 115-kV subtransmission line. (p. 4.3-30.) The DEIR’s discussion of the health effects on sensitive receptors considers the use of hazardous substances such as motor fuel, solvents, and lubricating fluid but it does not consider emissions of electric and magnetic currents.

The DEIR recognizes that the potential health effects of electromagnetic fields (“EMFs”) is an area of community concern, but is steadfast in refusing to discuss it:

248-9

At present, the CPUC does not consider EMFs, in the context of the California Environmental Quality Act (CEQA), to be an environmental impact because there is no agreement among scientists that EMFs create a potential health risk and because CEQA does not define or adopt standards for defining any potential risk from EMFs. Therefore, EMFs are not addressed in the Environmental Impacts and Mitigation Measures section of this document.

(pp. 4.8.-6.7.)

The fact that “CEQA does not define or adopt standards for defining any potential risk from EMFs” does not relieve the DEIR preparer from the responsibility to evaluate the potential impacts of EMFs. The intent of CEQA is to regulate activities to prevent both adverse effects on the environmental and to the health and safety of the people of the state. (See Pub. Res. Code, § 21000.) Section 15126.29(a) of the CEQA Guidelines specifically states that EIR discussion should include “health and safety problems caused by the physical changes.” The CEQA Guidelines acknowledge that when adopting thresholds of significance, “a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts.” (Guidelines, §15064.7) The United States Environmental Protection Agency identifies exposure to electromagnetic fields and falling power lines as potential hazards relevant to the siting of schools. (EPA School Siting Guidelines.) As such, the DEIR should address the health effects of electric and magnetic fields as a potential impact to sensitive receptors. The DEIR should quantify the levels of EMFs that sensitive receptors may be exposed to, and then provide studies relating to those levels.

248-10

The DEIR acknowledges that the CPUC has authorized “[n]o-cost and low-cost” measures to reduce magnetic fields that may be incorporated into the design of a project, such measures are not provided in the DEIR. The DEIR should provide a description of the potential “no-cost and low-cost” measures to reduce EMF and should explain how such measures would be effective in reducing exposure to EMFs.

248-11

3. Airport.

The DEIR’s discussion of airports indicates that “sections of 115-kV Segments ASP4 and ASP5 are located within the Influence Area of the Skylark Field Airport” (p. 4.8-19.). The DEIR goes on to disclose that:

Sections of 115-kV Segments ASP4 and ASP5 would be located less than 1,000 feet east of Skylark Field Airport (Figure 2-2b). Construction would occur along an existing 115-kV subtransmission line and within an existing ROW.

The lightweight steel poles installed along 115-kV Segments ASP4 and ASP5 within the Influence Area of Skylark Field Airport would range in height from 70 to 115 feet (Figure 2-6). The Skylark Field Airport manager stated that an initial review of the project did not raise concerns with regard to the proposed Alberhill Project as long as the structures installed are less than 120 feet high (Gulledge personal communication 2010). The 115-kV structures would range from 70 to 115 feet tall. Because the proposed structures would be less than 120 feet in height, installation of structures along ASP4 and ASP5 within the vicinity of the Skylark Field Airport would not result in a safety hazard for people working in the project area. Impacts under this criterion would be less than significant.

248-12

(p. 4.8-41)

Bluntly stated, this anecdotal information masquerading as analysis is simply incredible. As a point of beginning, while the office and airport hangars at Skylark Field are approximately 1,000 feet away from the project, the flight path appears to be significantly less than 1,000 feet away from the corner of Waite and Mission Trail where ASP 4 and ASP 5 meet. And that the entirety of the safety analysis is a casual conversation with the airport “manager” who had conducted an “initial review” of the project is shocking. (p. 4-8-41)

248-13

There is no analysis of the actual flight patterns at Skylark Field or the typical altitude of planes as they approach the runway. There is no analysis of likely flight patterns that may be utilized during inclement weather as pilots reduce plane altitudes to accommodate a visual landing. There is no information as to the impact of strong cross winds that are widely known to occur in the afternoons in Lake Elsinore.

Moreover, in considering the apparent safety “threshold” of 120-feet proposed by the airport “manager,” no allowance has been made for the fact that the airport runway is at a lower elevation than the elevation at Waite and Mission Trail. Indeed, the runway at Skylark field lies in a floodplain. And, while the City recognizes that the Federal Aviation Administration does not assert jurisdiction over Skylark Field, it nonetheless gives guidance to the placement of powerlines within a flight path of any airport. Yet, the guidance from one the government’s most knowledgeable agencies is left unreviewed in favor to the musings of the airport “manager.”

248-14

In summary, the powerlines in ASP 4 and ASP 5 could potentially create (and appear likely to create) a hazard for aircraft. Accordingly, the DEIR is required to address potential impacts related to the Alberhill Project’s vicinity to the Skylark Field Airport and propose mitigation measures, including undergrounding, to ensure the public’s safety. The analysis of airport safety in the existing DEIR is not merely inadequate; it is irresponsible.

4. Socioeconomic Impacts.

CEQA requires analysis of reasonably foreseeable indirect physical impacts as well as direct impacts. (Guidelines, § 15064(d).) Indirect impacts that must be considered include social or economic effects that result in a physical change in the environment. (Guidelines, § 15064(e).)

The Proposed Projects will have significant aesthetic impacts on the commercial uses along Mission Trail, Malaga Street, Casino Drive, Auto Center Drive, Third Street and Pasadena Street; residential development along Nichols Road, and Lake Street will likewise be heavily impacted.

248-15

The commercial uses impacted by the placement of transmission structures and lines will be less attractive and have less appeal to shoppers than non-impacted sites. These powerlines will make ingress and egress more difficult. Signage restrictions due to conflicts with the overhead transmission lines will also result in reduced visitors and profitability to the commercial uses. As a result, those commercial uses will only be able to draw lower quality tenants, and/or

commercial development will be shifted away from the freeway frontage to other sites. Consequently, businesses along the commercial corridors in the City will have reduced income.

Development for residential uses will also be less successful due to the Proposed Projects, as people do not find the transmission structures and lines attractive and they fear the health and safety consequences of living near the high EMFs. Property values along the Proposed Projects area will be reduced.

As a result of the aesthetic and hazard impacts, the planned and foreseeable land uses in the Proposed Projects' area will not be desirable or economically viable. Blight or urban decay may then occur, as land lies underdeveloped, people move from existing residences leaving them vacant and the vacancy rate of existing commercial buildings increase leading to potential urban decay. In *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, the court decertified EIRs for failure to consider urban decay. The court held that "land use decisions that cause a chain reaction of store closures and long-term vacancies, ultimately destroying existing neighborhoods and leaving decaying shells in their wake" must be studied, as they may constitute significant impacts. (*Bakersfield Citizens for Local Control, supra*, 124 Cal.App.4th at 1204.)

248-16

5. Environmental Justice.

Environmental justice refers to the concept that minority or low-income populations should not be disproportionately exposed to environmental hazards. In 1999, the State of California enacted legislation establishing environmental justice as an aspect of state law. California law defines environmental justice as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." (Gov. Code, § 65040.12(e); see also Pub. Res. Code, § 71110.)

248-17

Residents of the cities of Murrieta, Murrieta Springs, Perris, Menifee, and Wildomar, along with portions of the County of Riverside, would benefit from the Proposed Projects to the detriment of residents of the City of Lake Elsinore. While these residents will gain increased power reliability from the Proposed Projects, Lake Elsinore residents will potentially suffer from exposure to high levels of EMFs, aesthetic impacts, decline in property values, reduced socioeconomic conditions, and blight. The DEIR should analyze whether the residents of Lake Elsinore are disproportionately exposed to the Proposed Projects' impacts as compared to the residents of these other benefitted communities. The DEIR should also propose

an alternative route that does not disproportionately burden residents of the City of Lake Elsinore.

6. **Alternatives.**

The Proposed Projects include the undergrounding of transmission lines in some discrete areas outside of the City. Clearly, then, undergrounding is technically feasible. Undergrounding the 115 kV lines could reduce impacts to aesthetics, socioeconomics, and urban decay to less than significant.

CEQA requires the adoption of all feasible alternatives and mitigation measures that substantially reduce the environmental impacts of projects. (Pub. Res. Code, § 21002; Guidelines, § 15126.6 (a).) The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. (*Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866, 883.)

248-18

CEQA also requires an EIR present a reasonable range of alternatives to the project or to the location of the project which reduce the environmental impacts of the project. (Guidelines, § 15126.6(a); *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553.) The DEIR fails to present a reasonable range of alternatives. Alternatives should include other technologies and routes. The DEIR does not analyze any alternative routes for the Proposed Projects.

It appears that seven alternative routes were considered for the Valley-Ivyglen Project but were eliminated from the alternatives analysis. (p. 4.5-3) Particularly troubling is the failure to explore a route through the sparsely populated and largely undeveloped areas east of Interstate 15, north of State Route 74. These alternative routes were at least presented in the early environmental analysis of the Valley-Ivyglen Subtransmission Line and Fogarty Substation Project in 2007. Yet, the CPUC has been deprived of considering those alternatives in this DEIR. In light of the Proposed Project's striking visual impacts within the City of Lake Elsinore, the so-called "Northern Corridor" route deserves consideration by the CPUC as a viable alternative.

248-19

Instead, both Projects trounced through Lake Elsinore's highly regarded business parks and then head northwest to further impact critical future residential development along Nichols Road and Lake Street. Despite the location of the proposed Alberhill Substation on the north side of Interstate 15, the VIG 6 and VIG 7 remain on the southern side of Interstate 15 in order to deftly avoid impacting the highly-prized commercial centers located at Temescal Canyon in unincorporated Riverside County, just north of the City's boundaries. Approaching the new shopping center at De Palma Road and the residential development that

lies just north, the powerlines once again cross over the freeway apparently in order to avoid impacting these sensitive receptors. Indeed, it appears, based on the repeated freeway crossovers, that the featured route is particularly sensitive to impacts in virtually every community except Lake Elsinore.

Furthermore, although the EIR analysis of the alternatives is not required to be as comprehensive as the EIR analysis of the Proposed Projects, the alternative's discussion is so cursory as to prevent a meaningful comparison. For example, the Air Quality discussion of VIG Alternative M (Underground along the Entire Proposed Project Alignment) states that "[a]s shown in Appendix B, the undergrounding activities of the proposed project would create the greatest Peak Daily Emissions." (p. 5-18) However, the CPUC web site posting of the DEIR fails to provide Appendix B for public review. Without the supporting data to support the DEIR conclusion, the public is denied a reasonable opportunity to evaluate this analysis. In addition to making Appendix B available for public review, the DEIR analysis should have included a summary of the Air Quality and GHG Emission Calculations for each alternative and then evaluated whether additional mitigation measures would reduce the potential impacts to the same or lower levels than the Proposed Projects.

248-20

248-21

The DEIR's analysis of Land Use and Planning for Alternative M states that "[u]ndergrounding the entire alignment would neither create nor avoid a land use conflict that would result in significant environmental impacts. Impacts would be the same under this alternative as for the proposed project." (p. 5-20) As discussed above, this conclusion is clearly false. The undergrounding of the Proposed Project would avoid many of the land use conflicts of the Proposed Project.

248-22

Additionally, the Table 5-1 Summary of the Valley-Ivyglen Project Alternatives Analyses and Determination (p. 5-3) is structured to be misleading. For example, this table states that the VIG Alternative M impacts on Biological Resources, Cultural Resources, Hazards and Hazardous Materials, and Transportation and Traffic are "greater" than the Proposed Projects, but fails to point out that these impacts can be mitigated to less than significant levels with the mitigation measures similar to those developed for the Proposed Project. (pp. 5-19 through 5-21). It is clear that the comparison of project alternatives is biased toward the Proposed Projects.

248-23

Rather than propose an all or (almost) nothing approach to undergrounding, the DEIR should propose a thoughtful undergrounding alternative taking into account the areas where undergrounding may not be appropriate due to disturbance of sensitive habitat or the location of known cultural resources but providing for undergrounding in urban areas in which such concerns are lessened and aesthetic impacts are heightened. This type of "hybrid"

248-24

alternative has the potential to be the environmentally superior alternative and should be included. The range of alternative presented in the DEIR are not just inadequate; they are mystifying.

In summary, the DEIR fails to comply with CEQA's directive to "describe a reasonable range of alternatives to the project, or to the location of the project." (Guidelines, § 15126.6(a).)

7. Impacts Outside of the City of Lake Elsinore.

We have purposefully focused our comments above to those impacts that will be experienced within the City's municipal boundaries. However, we do believe that the Alberhill Substation deserves additional comment. The DEIR correctly identifies the visual impacts of the substation as "moderately high" and "high." However, the DEIR falls short in providing elevation drawings of the substation, dimensions, and depictions of proposed building materials. In failing to do so, the DEIR deprives those parties commenting on the DEIR an opportunity to make specific recommendations as to color, architecture and landscaping that could go a long way toward minimizing those identified "moderate high" and high visual impacts. We urge the CPUC to require that the DEIR include detailed elevation drawings (including the 49-foot tall switch racks), dimensions, building materials, and proposed landscaping of the Alberhill Substation for review and comments by the public.

248-25

B. Recirculation Required.

"When significant new information is added to an environmental impact report after notice" that the DEIR is available for public review, recirculation of the EIR is required. (Pub. Res. Code, § 21092.1.) In *Laurel Heights Improvement Assn. v Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1130, the court gave four examples of situations in which recirculation is required:

- When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigation measure;
- When the new information shows a substantial increase in the severity of an environmental impact, except that recirculation would not be required if mitigation that reduces the impact to insignificance is adopted;
- When the new information shows a feasible alternative or mitigation measure, considerably different from those considered in the EIR, that clearly would lessen the

248-26

environmental impacts of a project and the project proponent declines to adopt it; and

- When the draft EIR was “so fundamentally and basically inadequate and conclusory in nature” that public comment on the draft EIR was essentially meaningless.

The problems with the DEIR discussed above require recirculation for similar reasons as those set forth in *Laurel Heights*. The DEIR failed to consider the potentially significant impact of blight or urban decay. Impacts to aesthetics; hazards to sensitive receptors, impacts to the Skylark Field Airport, and socioeconomic effects are more severe than the DEIR recognized. Moreover, undergrounding is a feasible alternative or mitigation measure. Therefore, a DEIR revised to address the issues set forth herein and raised by other comment letters must be prepared and recirculated.

C. Conclusion.

In sum, the Proposed Projects will adversely affect private property values and result in impacts to land that make it no longer be suitable for residential or high quality commercial uses. This will, in turn, result in a lower socioeconomic base for the City of Lake Elsinore and its residents and businesses, and raises environmental justice concerns. As an indirect physical result, the Proposed Projects have the potential to cause blight or urban decay.

248-27

We request that the DEIR be revised to address the issues set forth herein and raised by other comment letters, and that the revised DEIR be recirculated for public review and comment in accordance with CEQA. Thank you for your attention to our concerns.

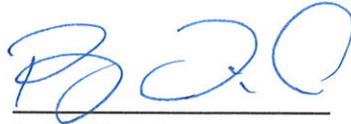
Alberhill System Project and Valley-Ivyglen Subtransmission Line Project

c/o Ecology and Environment, Inc.

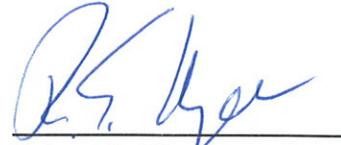
July 13, 2016

Page 13

Sincerely,



Brian Tisdale
Mayor



Robert E. Magee
Mayor Pro Tem



Steve Manos
Council Member

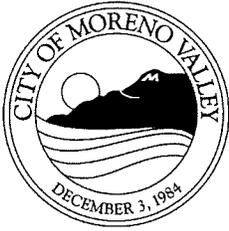


Daryl Hickman
Council Member



Natasha Johnson
Council Member

cc: Supervisor Kevin Jeffries, Board of Supervisors, County of Riverside
Assemblywoman Melissa A. Melendez, California State Assembly
Senator Jeff Stone, California State Senate
Steve Manos, Riverside County Airport Land Use Commissioner
Jeremy Goldman, Regional Manager of Southern California Edison
Grant Yates, City Manager, City of Lake Elsinore



Community Development Department
Planning Division
14177 Frederick Street
P. O. Box 88005
Moreno Valley CA 92552-0805
Telephone: 951.413-3206
FAX: 951.413-3210

May 25, 2016

California Public Utilities Commission
Mr. Jensen Uchida, CPUC Project Manager
RE: VIG/ASP
C/o Ecology and Environmental Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111

Re: Notice of Availability for the Southern California Edison Valley-Ivyglen Subtransmission Line and Alberhill System Projects Draft Environmental Impact Report (EIR)

Dear Mr. Uchida,

The City of Moreno Valley appreciates the opportunity to comment on the Draft Environmental Impact Report (FEIR) for the Southern California Edison Valley-Ivyglen Subtransmission Line Project and Alberhill System Project.

33-1

The proposed project is located in unincorporated southern Riverside County and in close proximity to the City of Lake Elsinore. As the project will not negatively impact the City of Moreno Valley, we do not have any comments to provide on the environmental document.

We look forward for the opportunity to review the final EIR once it becomes available. Please include the City on any mailing lists regarding final documents as well as for future notifications of meetings/public hearings associated with the project.

33-2

Should you have any questions or concerns, please contact Mark Gross, Senior Planner at (951) 413-3215.

Sincerely,

Mark Gross, AICP
Senior Planner

Cc Richard J. Sandzimier, Planning Official

Midbust, Jessica

From: Hildebrand, John <JHildebr@rctlma.org>
Sent: Wednesday, June 01, 2016 7:35 AM
To: VIG/ASP
Cc: Weiss, Steven; Magee, Robert
Subject: Riverside County Comment Letter - Glen Ivy / Alberhill Transmission Lines
Attachments: Riverside_County_Comment_Letter_05-25-2016.pdf

Follow Up Flag: Follow up
Flag Status: Completed

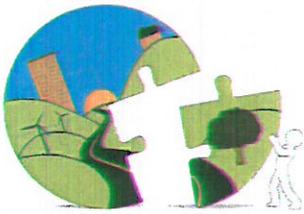
Attached is Riverside County's Comment letter regarding the Draft EIR for the Glen Ivy / Alberhill Transmission Line extension project.

Thank you for your consideration,

Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

John Earle Hildebrand III – *Principal Planner*
eMail: jhildebr@rctlma.org
Phone: (951) 955-1888





RIVERSIDE COUNTY PLANNING DEPARTMENT

Steve Weiss AICP
Planning Director

Date: May 25, 2016

To: California Public Utilities Commission RE: VIG/ASP
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

From: Steve Weiss, AICP – Riverside County Planning Director

RE: Alberhill and Glen Ivy Draft Environmental Impact Report

The County of Riverside has had the opportunity to review the Draft Environmental Impact Report ("DEIR") for the proposed Alberhill and Glen Ivy transmission lines project. Understanding the importance of providing services to the area to accommodate future growth, the County still has several concerns regarding the proposed alignment through the Temescal Wash area, specifically at the transition point between the 115kV line underground to above ground, and running north to the proposed new substation. The County's concerns are identified as follows:

50-1

1. Aesthetics – The proposed transmission line runs parallel to the I-15 Freeway, crossing it at several points. The visual impact of transmission line towers and accompanying substations will create significant negative visual impacts to the area and interfere with established view corridors.

50-2

2. Habitat Conservation – The portion of the proposed transmission line extending through the Temescal Wash area, spans several Riverside County Multiple Species Habitat Conservation Plan ("MSHCP") criteria cells. The cells in this area contain a variety of plant and animal critical habitat, specifically identified as coastal sage scrub, riparian scrub, chaparral, and they also contain movement corridors for several animal species. The installation of new transmission line towers and accompanying substations in this area will interfere with the conservation requirements identified under the County's MSHCP and also potentially disrupt established movement corridors.

50-3

3. Existing Entitlements – Specific Plan No. 353 (Serrano Commerce Center), adopted by the Riverside County Board of Supervisors on September 8, 2010, includes approximately 489 acres of master planned streets, infrastructure, and development areas. The Specific Plan area lies immediately adjacent to the I-15 Freeway on the east, extending to the Temescal Wash on the west and spanning from Temescal Canyon Road on the south to Dawson Canyon Road to the north. The proposed transmission line corridor bifurcates the specific plan in its entirety and repurposes the land use in the northwestern portion for use as a large-scale substation. Furthermore, portions of the substation appear to be located within established Open Space-Conservation areas identified within the Specific Plan.

50-4

Riverside Office · 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 · Fax (951) 955-1811

Desert Office · 77-588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7040

This same area currently contains an active surface mining operation, entitled under File No. RCL00135 (Ben's Mine). The proposed substation location is shown in the same location as the existing mining operations.

50-5

Given the aesthetic and habitat concerns, as well as the conflict with approved plans, the County of Riverside requests that Southern California Edison relocate the proposed transmission line towers and substation further east to a more appropriate location.

50-6



Steve Weiss, AICP

County of Riverside Planning Director

Enclosures:

1. Southern California Edison: Figure 3-3 (ASP Alternative DD)
2. Specific Plan No. 353: Figure 1-1 (Land Use Plan)



Figure 3-3
ASP Alternative DD
 Alberhill and Valley-Ivyglen Projects
 Riverside County, California

■ Existing Substations
— 500-kV Serrano Valley Transmission Line
■ ASP Alternative DD
○ Alternative Substation
— 115kV Aboveground
- - 115kV Underground
— 500-kV Lines



FIGURE I-1



COUNTY OF RIVERSIDE

TRANSPORTATION AND LAND MANAGEMENT AGENCY



Juan C. Perez, P.E., T.E.
*Director of Transportation and
Land Management*

Transportation Department

Patricia Romo, P.E.
Director of Transportation

July 15, 2016

California Public Utilities Commission, Re: VIG/ASP
c/o Ecology and Environment
505 Sansome St., Suite 300
San Francisco, CA 94111

RE: Draft Environmental Impact Report for Alberhill System Project and Valley-Ivyglen Subtransmission Line Project

The Riverside County Transportation Department (County) appreciates the opportunity to submit comments on the Draft Environmental Impact Report (EIR) for the Alberhill System Project (ASP) and Valley-Ivyglen Subtransmission Line Project (VIG). The projects propose to develop a new 500/115-kV substation, new 500-kV transmission lines, new and modified 115-kV subtransmission lines with telecommunications system installations. The extent of the projects span across six Area Plans in Riverside County: Temescal Canyon, Elsinore, Mead Valley, Sun City/Menifee, and Harvest Valley/Winchester.

Our concerns are focused on the impacts ASP and VIG will have on the County's ability to construct new or expand existing roadways within our jurisdiction, particularly Temescal Canyon Road. The EIR simply does not provide sufficient information related to the location of the poles and transmission lines in order to determine their impacts to County roadways.

337-1

Temescal Canyon Road

North of Indian Truck Trail, the County's General Plan Circulation Element designates Temescal Canyon Road as an Arterial Highway with an 86-foot paved section and 128-foot full-width right-of-way. This portion of Temescal Canyon Road predominantly coincides with Segment VIG8 identified on Figure 2.2a in the EIR. As described on Pages 2-15 and 2-21, Segment VIG8 would be installed underground along Temescal Canyon Road within new right-of-way. The information provided only gives a general depiction where the VIG8 components will be installed, however the EIR needs to provide scaled plans with cross sections identifying the location of improvements relative to the existing road and right-of-way. The County views Temescal Canyon Road as a critical roadway for the area, serving as an emergency access route and providing relief as congestion develops on the freeway. Therefore improvements made by VIG and/or ASP that impede the County's ability to improve and widen Temescal Canyon Road would be highly detrimental to traffic safety and mobility and would be considered an impact.

337-2

The County is currently working to develop an alignment study for Temescal Canyon Road between Indian Truck Trail and Lake Street. This would cover Segments VIG5 and VIG6 shown on Figure 2.2a where poles and subtransmission lines are proposed to be installed on one or both sides of Temescal Canyon Road. The County requests the CPUC to require the project applicant to coordinate its design of Segments VIG5 and VIG6 with the County's alignment study for reasons mentioned previously.

State Route 74

An effort has begun to relinquish portions of State Route 74 between the Cities of Lake Elsinore and Perris to the County (refer to 2015-2016 AB-218). Additionally, in anticipation of this effort, the County is initiating a Project Study Report that would study an east-west corridor between I-215 and I-15 through a route utilizing Ethanac Road ultimately aligning and connecting to the Nichols Road interchange. This route overlaps with Segments VIG1 and VIG2. We request that the project applicant be required to coordinate with the County in order to develop a plan that works for both the road and utility projects.

General Plan Circulation Element Roadways

Alternatives to the proposed project utilize Temescal Canyon Road to a lesser extent, however roadways such as Campbell Ranch Road and De Palma Road are still employed. Comments made on Temescal Canyon Road apply similarly to other General Plan designated roadways in the County. Refer to County's General Plan Circulation Element for roadway designations and Ordinance 461 for detailed roadway design standards.

Encroachment permits

The County concurs with the EIR that the projects are required to obtain encroachment permits for each affected County roadway or other transportation right-of-way. Detail design plans of the proposed pole locations shall be submitted to the County for review and concurrence.

General Plan Circulation Element Policies

In addition to the County General Plan Policies related to roadway level of service, the Circulation Element also includes the policy below related to utility infrastructure.

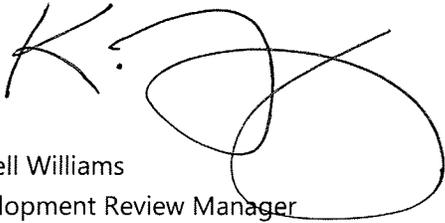
C 20.5

In order to protect the watershed, water supply, groundwater recharge, and wildlife values of watercourses, the County of Riverside will avoid siting utility infrastructure and associated grading, fire clearance, and other disturbances within or adjacent to watercourses, if there are feasible alternatives available, and discourage special districts and other governmental jurisdictions outside of Riverside County's authority, from doing so. Where such watershed utility siting locations cannot be avoided, the impacts on watercourses shall be minimized.

We appreciate the importance of providing safe and reliable electrical service for anticipated growth, however it is essential that the CPUC and applicant work with us in order to eliminate any incompatibilities between the ultimate roadways and utilities.

Thank you again for the opportunity to review the EIR. Please contact me at (951) 955-2016 with questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'Russell Williams', written over a printed name and title.

for

Russell Williams

Development Review Manager

RUW:KKT

cc: Juan C. Perez, Director of Transportation and Land Management
Patricia Romo, Director of Transportation
Mojahed Salama, Deputy Director of Transportation

Midbust, Jessica

From: Matthew Bassi <mbassi@cityofwildomar.org>
Sent: Thursday, July 14, 2016 2:33 PM
To: VIG/ASP; Jeremy Goldman (Jeremy.Goldman@sce.com)
Cc: Gary Nordquist; Dan York
Subject: CITY OF WILDOMAR COMMENTS - ALBERHILL SYSTEM PROJECT DEIR REVIEW
Attachments: SCE Alberhill EIR Comments 7-14-16.pdf

Importance: High

Please accept the following comment letter on the project referenced above. We respectfully request a replay email noting the City's comment letter has been received. If you have any questions, please call me at your convenience. | 377-1

Matthew C. Bassi

Planning Director

City of Wildomar

23873 Clinton Keith Road, Suite 201
Wildomar, CA 92595
Work: 951-677-7751 x213
Fax: 951-698-1463

City Hall Hours:

Monday - Thursday
8:00 a.m. - 5:00 p.m.

Reminder: City Hall is Closed Friday's

All e-mail to and from the City of Wildomar may be considered public information and may be disclosed upon request.

Bridgette Moore, Mayor
Timothy Walker, Mayor Pro Tem
Bob Cashman, Council Member
Marsha Swanson, Council Member
Ben J. Benoit Council Member



23873 Clinton Keith Rd, Ste 201
Wildomar, CA 92595
951/677-7751 Phone
951/698-1463 Fax
www.CityofWildomar.org

July 14, 2016

California Public Utilities Commission (CPUC)
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

Subject: Southern California Edison (SCE) Alberhill System Project Environmental Impact Report (EIR)

Dear CPUC,

The City of Wildomar has reviewed the Draft EIR for the Southern California Edison (SCE) Alberhill System Project. Based on our review, the City of Wildomar offers the following comments to be addressed and responded to in the Final EIR.

- 1) The area from Lost to Beverly is already in a high fire hazard area. Will this new facility cause higher fire insurance costs to Wildomar residents living along this facility? 377-2
- 2) As noted in the DEIR, the alignment of this transmission line passes nearby existing residents living along the route. Will the upgraded facility have an EMF impact on these residents, and if so, it must be properly mitigated in accordance with CEQA provisions? 377-3
- 3) Given the aesthetics impacts from the proposed above ground transmission line, the City respectfully requests that the alignment along Mission Trail in the City of Wildomar be underground to reduce these aesthetic impacts to a less than significant level in accordance with CEQA provisions. 377-4
- 4) All work to be done in the City's of Wildomar's rights-of-way will require approval of an encroachment permit from the City Public Works Department. The encroachment permit forms can be obtained from the City staff or from the City's website at the following web address: <http://www.cityofwildomar.org/uploads/files/public-works/Permit%20Applications/Encroachment%20Permit%20Application.pdf> 377-5
- 5) Improvement Plans and Traffic Control plans shall be submitted to the city for review and approval prior to EP issuance. The city recognizes the State Manual on Traffic Control <http://www.dot.ca.gov/trafficops/camutcd/> as the basis for preparation of Traffic control plans. 377-6
- 6) None of the EIR figures appear to show city limit lines which may be why the description of ASP4 neglects to mention that much of Mission Trail which is actually in the City of Wildomar. We ask that this be addressed and correctly shown. The City's zoning map may be reviewed and downloaded for the website at the following address: <http://www.cityofwildomar.org/planning.asp> 377-7

- 7) Construction noise in the City is exempt from the limitations of the noise ordinance pursuant to Chapter 9.48 of the Wildomar Municipal Code; however, the exemption periods are from 6:00 AM through 6:00 PM, which is a different period than “Commitment H” expressed in the DEIR. This should be reconciled and/or mitigated so the construction periods are consistent with the City’s Noise Ordinance. 377-8
- 8) Table 2-2 on page 2-28 of the EIR explains the type of poles that will be used in ASP4 and ASP5 that will impact Wildomar. The Light Weight Steel (LWS) and Tubular Steel Pole (TSP) is shown on Figure 2-4; however, there is no corresponding illustration of the H-frame structures proposed in ASP5. There is also no indication of which poles will be used at locations along the route. While some of this may be determined during final engineering, there are features such as “guy wires” that could cross over roadways further degrading the aesthetic of the neighborhood along the route. Please provide design details that minimize aesthetic impacts. If the poles and wire underground as requested this comment could be address to a less than significant level. 377-9
- 9) The alignment for ASP4 and ASP5 travel through parts of Wildomar that have existing overhead lines. This project will worsen the view, make it more difficult to underground the lines in the future by reinvesting in the existing infrastructure. The existing lines should be underground to match the request for undergrounding of the new lines/poles. 377-10
- 10) The use of self-weathering poles as stated in MM AES-9, does not address the significant impact associated with taller poles and more lines in these areas. Further, the City requires that power lines be underground (Municipal Code Section 16.40.010). The EIR notes that wires are undergrounded by mitigation measure MM AES 10 discussed on page 4.1-61 of the EIR. The rationale used in the EIR, beginning on line 9 of page 4.1-61, is require “...undergrounding of the alignment in the area where there are no aboveground utility structures along Murrieta Road.” The City does not dispute this as a rationale, however we strongly disagree that this should be the only standard applied to determine when undergrounding is appropriate. 377-11

The City looks forward to reviewing the Final EIR prior to its certification in accordance with CEQA provisions. If you have any questions regarding the City’s comments, please contact me at (951) 677-7751, extension 213. I can also be reached via email at mbassi@cityofwildomar.org.

Sincerely,



Matthew C. Bassi
Planning Director

CC: Gary Nordquist, City Manger
Dan York, Assistant City Manger/Public Works Director
Jeremy Goldman, SCE Local Public Affairs Southern California Edison