

PUBLIC UTILITIES COMMISSION

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May 22, 2015

Ian Forrest, Senior Attorney
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**RE: Application Deficiency - Certificate of Public Convenience and Necessity for the
Riverside Transmission Reliability Project – Application No. A.15-04-013**

Dear Mr. Forrest,

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its review of Southern California Edison's (SCE's) Application (A. 15-04-013) for a Certificate of Public Convenience and Necessity (CPCN) for the Riverside Transmission Reliability Project (RTRP). The CPUC has also reviewed the Final Environmental Impact Report (EIR) prepared by the City of Riverside pursuant to the California Environmental Quality Act (CEQA) and the associated administrative record. The City of Riverside is the Lead Agency under CEQA, responsible for preparation of the EIR. The CPUC is a Responsible Agency under CEQA, responsible for the certification of the CPCN.

City of Riverside Final EIR

The City of Riverside certified the Final EIR for the RTRP in October 2013 and filed the Notice of Determination on February 6, 2013. The Final EIR certified by the City of Riverside, along with the entire administrative record of the proceeding before Riverside were filed with the Application as information equivalent to a Proponent's Environmental Assessment.

In March 2013, Jurupa Valley filed a CEQA lawsuit in Superior Court challenging Riverside's approval of RTRP. On May 1, 2014, the Los Angeles Superior Court denied Jurupa Valley's challenge and upheld the Final EIR and Riverside's approval of the Project. Jurupa Valley appealed that decision and the appellate case is currently pending.

Changed Conditions in the Project Alignment

Subsequent to the certification of the EIR and approval of the RTRP, the City of Jurupa Valley certified an Initial Study/Mitigated Negative Declaration (IS/MND) and approved the Riverbend housing project, a 466-unit subdivision at the southeast corner of Wineville Avenue and Cantu-Galleano Ranch Road. The project would be located on a 36.6-acre parcel over approximately 1 mile of the length of the proposed RTRP transmission line alignment. The approved vested tentative map and zoning and development plan for the subdivision did not include a right-of-way alignment for the RTRP route. The Project has been purchased by Lennar Homes, Inc. Lennar has graded the site and purportedly made other improvements.

In addition, the City of Jurupa Valley certified an IS/MND and approved the Vernola Marketplace Apartments Project at the northwest corner of 68th Street and Pats Ranch Road in Jurupa Valley. The Notice of Determination was filed on March 20, 2015. The project includes development of 25 apartment buildings, with 397 residential units, on a 17.4-acre property. The project site is within the proposed alignment for the RTRP; the IS/MND did not consider the RTRP and the effects on the proposed apartments.

The approved subdivisions within the RTRP route are considered a substantial change in circumstances, which will require the CPUC to prepare a Subsequent EIR to address new significant environmental effects pursuant to CEQA Guidelines Section 15162.

Application Incomplete

After review of SCE's application for the RTRP, the Energy Division finds that the information contained in the Application and Final EIR is incomplete. The attached report identifies the portions of the application found to be deficient.

Information provided by SCE in response to the Energy Division's finding of deficiency should be filed as supplements to Application A. 15-04-013. One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, in both hardcopy and electronic format. We request that SCE respond to this report no later than July 21, 2015.

We will review the information within 30 days and determine if it is adequate to accept the application as complete. We will be available to meet with you at your convenience to discuss these items.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SCE's CPCN be approved.

Please direct questions related to this application to me at (415) 703-5484 or Jensen.Uchida@cpuc.ca.gov.

Sincerely,



Jensen Uchida
Project Manager
Energy Division, CEQA Unit

cc: ALJ
Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager
Jack Mulligan, CPUC Attorney
Jeff Thomas, Project Manager, Panorama Environmental, Inc.

DEFICIENCY REPORT FOR THE RIVERSIDE TRANSMISSION RELIABILITY PROJECT APPLICATION (A. 15-04-013)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in Southern California Edison’s (SCE’s) Application (A.15-04-013) for a Certificate of Public Convenience and Necessity for the Riverside Transmission Reliability Project (RTRP). Deficiencies were identified according to requirements of the CEQA (Public Resources Code Section 21000 *et seq.*) General Order 131-D and the Commission’s Rules of Practice and Procedure for a CPCN. Deficiencies are presented in Table 1.

Table 1: SCE Riverside Transmission Reliability Project Application 15-04-013 Deficiencies

Number	Deficiency
1	<p>SCE's Application, Final EIR, and Administrative Record do not contain adequate information to document the change in circumstances since Riverside certification of the Final EIR. Additional information is required regarding the Riverbend housing project and Vernola Marketplace Apartment Community to document the current baseline conditions in the proposed RTRP alignment. This information should include modifications to the environmental setting in the EIR to reflect the conditions in the transmission corridor resulting from the approved subdivisions consistent with the requirements of the CPUC PEA Checklist for Transmission Line Projects (October 2008) including:</p> <ol style="list-style-type: none"> 1. Documentation of baseline aesthetic conditions at the approved housing developments. 2. Updated agricultural setting to reflect the Riverbend housing project within an area that was previously Williamson Act farmland. 3. Updated habitat acreages within the transmission corridor to reflect grading and other habitat modifications since the filing of the EIR. 4. Updated land use and zoning designations to reflect the approved residential developments. 5. Updated transportation and traffic conditions to reflect the approved residential developments and current traffic volumes.
2	<p>SCE's Application, Final EIR, and Administrative Record do not provide an assessment of the environmental impacts of the RTRP on the Riverbend housing project (466 single family lots) and the Vernola Marketplace Apartment Community. The following information is needed to evaluate impacts on the residential developments, consistent with the CPUC PEA Checklist for Transmission Line Projects (October 2008):</p> <ol style="list-style-type: none"> 1. A visual simulation of the RTRP with the proposed housing development and analysis of cumulative aesthetic impacts from the housing developments and the RTRP. 2. Revisions to the area of agricultural impacts provided in the EIR to reflect the conversion of Williamson Act farmland at the Riverbend housing project to a residential development.

Table 1: SCE Riverside Transmission Reliability Project Application 15-04-013 Deficiencies

Number	Deficiency
	<ol style="list-style-type: none"> 3. Updates to the habitat impact acreages in the EIR to reflect grading of the Riverbend project and any other changes in baseline conditions since publication of the EIR. 4. Description of hazards associated with construction and operation of the proposed project within the approved residential developments. 5. Land use impacts associated with conflicts between the proposed project transmission alignment and the approved residential developments. 6. Increased noise impacts from construction within residential subdivisions and long-term corona noise impacts on the subdivision. 7. Impacts from construction and operation of the proposed project on transportation and traffic considering the roads that are proposed within the approved subdivisions. 8. Impacts of the proposed project on population and housing. 9. Cumulative impacts of the proposed project with other cumulative projects that are currently planned in the area.
3	<p>CEQA requires consideration of alternatives that are capable of substantially reducing or eliminating significant environmental effects (CEQA Guidelines Section 15126.6(a)). Define alternatives that meet the project objectives and reduce or avoid potentially significant impacts of the proposed project on the approved Riverbend housing project and Vernola Marketplace Apartment Community. This may include local routing alternatives or electrical system alternatives.</p>
4	<p>Provide the total volume of water that will be required for construction of the project. The City of Riverside Final EIR and response to comments state that a maximum of 40,000 gallons of water would be applied per mile per day. This volume of water does not equate to a total volume required for the project. Specify a total maximum volume of water needed for the project and the source of water.</p>
5	<p>Define the proposed location for disposal of hazardous waste and treated wood poles that would be removed by the proposed project.</p>