

## Friends of Riverside Airport

8175 Limonite Avenue, Jurupa Valley, CA 92509  
(951) 360 2070

To: Riverside Transmission Reliability Project

Hand Delivered April 24, 2018

Subject: Property Affected by Riverside Transmission Reliability Project.

Dear Sirs and Madams:

Attached please find a map showing our intended use for our property. We have been removing PCB's from the property under the supervision of the Department of Toxic Substances (DTSC). The City of Riverside has not allowed us to submit the attached map until the property meets the DTSC requirements. The project is covered by a Development Agreement between our LLC and the City.

The proposed taking for the power line would eliminate as many as 15 lots from the proposed map and would compromise the desirability of many more. Our clean up costs related to PCB's is approximately 30 million dollars for the 60 acres involved or an average of about \$500,000 per acre.

We realize that the power line is needed by the City and would cooperate if we were properly compensated for the pro rata share of our PCB clean up costs and our lost revenue from the development of the homes that would be eliminated.

Sincerely,

Friends of Riverside Airport



Henry C. Cox, II  
Managing Member









**Southern California Edison's  
Riverside Transmission Reliability Project**

**CPUC Comment Form  
Draft Subsequent EIR Informational Workshop**

April 2018

Comments must be postmarked or received no later than **May 17, 2018** to be considered in the Final Subsequent Environmental Impact Report. Comments may be submitted at the informational workshops or mailed to the address below.

Before including your address, telephone number, email address, or other personal identifying information in your comments, please be aware that your entire comment (including your personal identifying information) may be made publicly available. You may request to withhold your personal identifying information from public review by stating so prominently at the beginning of your comment below. Such requests will be honored to the extent allowed by law.

**Please print clearly:**

Riverside does Not want the 2013 EIR  
overhead alignment. Goes against the  
Open Space & Conservation Element, degrades  
the existing visual character of our Western  
Gateway into our city. Bad for Riverside  
Residents, bad for our Wildlife Preserve, etc.  
Bad Bad Bad! NO means NO!

NAME Anna Moore DATE April 24, 2018  
ORGANIZATION/CONSTITUENCY REPRESENTED (IF ANY) Riverside Neighborhood Partnership Board representative  
ADDRESS Riverside Ward 1  
EMAIL ADDRESS

**Please hand this form in or mail by May 17 to:**

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

Email comments to [riversidetrp@panoramaenv.com](mailto:riversidetrp@panoramaenv.com) or fax comments to 650-373-1211.



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**Please print clearly:**

2013 Draft EIR needs to be revisited now.  
Overhead transmission lines running 8 miles through  
protected wildlife habitats, beautiful open space,  
~~and~~ this is the gateway to Riverside from the  
west. It would substantially degrade existing  
landscape, Santa Ana River Corridor and impose an  
industrial use on <sup>this</sup> land. No No No overhead on  
South side of River. Riverside does NOT want  
this to change our beautiful gateway, last  
open space left.

NAME

Anna Nobre

DATE

April 24, 2018

ORGANIZATION/CONSTITUENCY REPRESENTED (IF ANY)

Riverside Neighborhood Partnership Representative

ADDRESS

6588 Sandy Lane Riverside CA 92505

EMAIL ADDRESS

eighty8anna@aol.com

**Please hand this form in or mail by May 17 to:**

Riverside Transmission Reliability Project

717 Market Street, Suite 650

San Francisco, CA 94103

Email comments to [riversideirp@panoramaenv.com](mailto:riversideirp@panoramaenv.com) or fax comments to 650-373-1211.



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**Please print clearly:**

As a resident of the city of Riverside and a RNP representative Board member for the area this Project will be in I am outraged. I feel that the city did not properly notify any of us regarding this Project and its Impacts, to this day. The majority of residents in our area had no clue at all. The most any one was told was that Riverside was getting a second connection to the grid. Riverside city officials, city staff, even Riverside Public Utilities were very vague about the details to this Project, never stating where exactly it was located, if it was under or overhead, and why it was such a dire need for the city. The city should have been more up front with its residents, we feel cheated, ignored, and unimportant as a result of this. The impacts it would have on my neighborhood are extreme. Eight miles of overhead transmission lines would be running the entire West section of the Santa Ana River. The community is very dependant on this public outdoor recreation area. Don't pollute the skies. The 2013 EIR should be revised.

NAME

Anna Moore

DATE

April 24, 2018

ORGANIZATION/CONSTITUENCY REPRESENTED (IF ANY)

Riverside Neighborhood Partnership Board Representative

ADDRESS

6588 Sandy Lane Riverside CA 92505

EMAIL ADDRESS

eighty8anna@aol.com

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**Please print clearly:**

NO OVERHEAD POWERLINE !

NAME Daisy Du

DATE 4/25/2018

ORGANIZATION/CONSTITUENCY REPRESENTED (IF ANY) Lesso Mall Development (Jurupa Valley) Limited

ADDRESS 1010 Railroad St. Corona . CA . 92882

EMAIL ADDRESS daisydu@lessoamerica.com

**Please hand this form in or mail by May 17 to:**

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

Email comments to [riversidetrp@panoramaenv.com](mailto:riversidetrp@panoramaenv.com) or fax comments to 650-373-1211.



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Please print clearly:

I believe in order to secure the "quality of life" for  
Citizens, we need to be a <sup>Preserve</sup> progressive country. Sometimes  
this may cost a lot of money, but in the long run  
we make it a better place to live. I am not opposed  
to providing Riverside with a backup power system,  
however, we must always maintain the quality  
of life for those who are directly affected by taking  
these lines overhead. I would strongly urge CPUC  
mandate these lines to go underground.

NAME JOHN A. RUSSO

DATE 4/25/18

ORGANIZATION/CONSTITUENCY REPRESENTED (IF ANY) JURUPA VALLEY AGAINST POWERLINE ABUSE

ADDRESS JRUSSO@E-EQUITIES.COM

EMAIL ADDRESS

Please hand this form in or mail by May 17 to:

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

Email comments to [riversidetrp@panoramaenv.com](mailto:riversidetrp@panoramaenv.com) or fax comments to 650-373-1211.



May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

I am writing to express my support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. With Riverside serving as the economic driver in one of the fastest growing regions in the country, RTRP provides a viable, long term energy reliability solution to ensure continued prosperity into the future.

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

With recent business expansion in Riverside, including the \$414 million California Air Resources Board emissions testing facility, providing long-term transmission capacity via this proposal will play a pivotal role in attracting and retaining businesses to the region.

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

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

Respectfully,

  
Name

  
Title

  
Company



On behalf of Sigma Stretch Film of CA , I hereby express support for the **Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line, a new 230/69 kV electrical substation, and new 69 kV sub transmission lines. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the five project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside's 330,000 residents, our thriving business community, and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals and trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands of Inland Empire residents.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced by the city during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinarily long time to wait for a basic protection that all of Riverside's neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, Sigma Stretch Film of CA respectfully urges the California Public Utilities Commission to approve the RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [FRED.STABILE@SIGMAPLASTICS.COM](mailto:FRED.STABILE@SIGMAPLASTICS.COM).

Sincerely,

*Fred Stabile*

Fred Stabile  
Plant Operations Manager





On behalf of Galleria at Tyler, I hereby express support for the **Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line, a new 230/69 kV electrical substation, and new 69 kV subtransmission lines. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the five project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

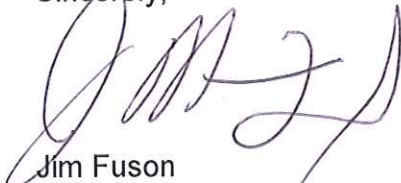
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As such, to ensure public safety and protect the economic future of Riverside, Galleria at Tyler respectfully urges the California Public Utilities Commission to approve the RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [james.fuson@ggp.com](mailto:james.fuson@ggp.com).

Sincerely,



Jim Fuson  
Sr. General Manager

**The Utility Reform Network (TURN) Comments on  
Riverside Transmission Reliability Project  
(Application No. 15-04-013)  
Draft Subsequent Environmental Impact Report**

Submitted by	Company	Submitted to	Date Submitted
Thomas Long Legal Director, TURN 785 Market St., Suite 1400 San Francisco, CA 94103 Email: <a href="mailto:TLong@turn.org">TLong@turn.org</a> Phone: (415) 929-8876 x303	The Utility Reform Network (TURN)	c/o Panorama Environmental, Inc. <i>riversidetrp@panoramaenv.com</i>	May 15, 2018

The Utility Reform Network (TURN) appreciates the opportunity to provide comments to the California Public Utilities Commission (CPUC) on the Draft Subsequent Environmental Impact Report (DSEIR) for the Southern California Edison Southern California Edison's (SCE) proposed Riverside Transmission Reliability Project (RTRP or Project) in Riverside County, California.

## **Background**

The Proposed Project is a component of the larger Riverside Transmission Reliability Project (RTRP) that was jointly planned by SCE and Riverside Public Utilities (RPU). The RTRP includes components that would be owned and operated separately by RPU and SCE. RPU would construct, own, operate, and maintain certain elements of the RTRP, including the new 69-kilovolt (kV) Wilderness Substation, 69-kV sub-transmission lines, and interconnection and telecommunication facilities.

The SCE CPCN application (A. 15-04-013) includes the construction, operation, and maintenance of RTRP elements that would be owned and operated by SCE including:

- Approximately 8 miles of new overhead 230-kV transmission line
- Approximately 2 miles of new underground 230-kV transmission line
- New 230-kV Wildlife Substation
- Modifications of existing overhead distribution lines
- Modifications at existing substations
- Telecommunication facilities between the existing Mira Loma and Vista Substations, and the proposed Wildlife Substation

The original SCE CPCN application estimated direct costs for RTRP's CAISO Controlled Facilities at **\$234.5 million** in 2015 constant dollars. However, the more recently proposed RTRP Hybrid Project is expected to cost **\$353 million** (constant 2015 dollars), which equates to **\$405.3 million** in nominal 2023 dollars.<sup>1</sup> The City of Riverside analyzed the RTRP in an EIR finalized in 2013. The DSEIR addresses some aspects of the Proposed Project that were not previously analyzed by RPU in their 2013 EIR.

The two basic Project objectives identified in the DSEIR are<sup>2</sup>:

- CPUC Basic Project Objective #1: Increase capacity to meet existing electrical system demand and anticipated future load growth; and
- CPUC Basic Project Objective #2: Provide additional source of bulk power into the RPU electrical system

The DSEIR incorrectly applies the above-mentioned two Project objectives to eliminate some potential Project alternatives considered in the DSEIR including the "No Project" alternative. Under the California Environmental Quality Act (CEQA), the CPUC must fully explore the "No Project" alternative.

## Assessment

### *The Adequacy of Existing Resources to Meet Current Need and Declining Forecast of Future Loads Call into Question the Need for the Proposed Project*

Based upon the data provided in the *DSEIR* and in the *Joint RTRP Lower Voltage and Other Design Alternatives Report* (Lower Voltage Report) developed by RPU and SCE with advice and guidance from CAISO, there is no need for the Project Objective #1, that is, a need to increase capacity to meet existing electrical system demand and anticipated future load growth. Figure 1 below compares the RPU's projected annual peak load with RPU's current load serving capability. RPU has an estimated *1-in-20* peak load of 669 MW by 2023 and 689 MW by 2029 as shown as the yellow line in Figure 1.<sup>3</sup> As can be seen, RPU's current combined load serving capability at Vista substation and its internal generation of nearly 785MW is significantly higher than its *1-in-20* projected peak load of 689 MW in 2029. Even under a single contingency condition, i.e., the loss of a single RPU generating unit, the combined load serving capability of RPU is as high as 737MW (557MW at Vista plus 180MW of internal generation), which is still significantly greater than the projected peak load by 2029. Furthermore, as shown in the orange line in Figure 1, RPU's *1-in-10* Net Electricity Peak Demand under the California Energy Demand (CED) Forecast 2018 - 2030, Mid Demand Baseline Case, Low AAEE<sup>4</sup> and AAPV<sup>5</sup> Savings developed in February 2018 as part California Energy Commission (CEC) 2017

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<sup>1</sup> The use of the term "Hybrid" refers to the combination of both overhead and underground transmission facilities included in the design. The RTRP design as originally proposed and evaluated in the 2013 FEIR consisted entirely of overhead facilities.

<sup>2</sup> DSEIR, p. 1-13

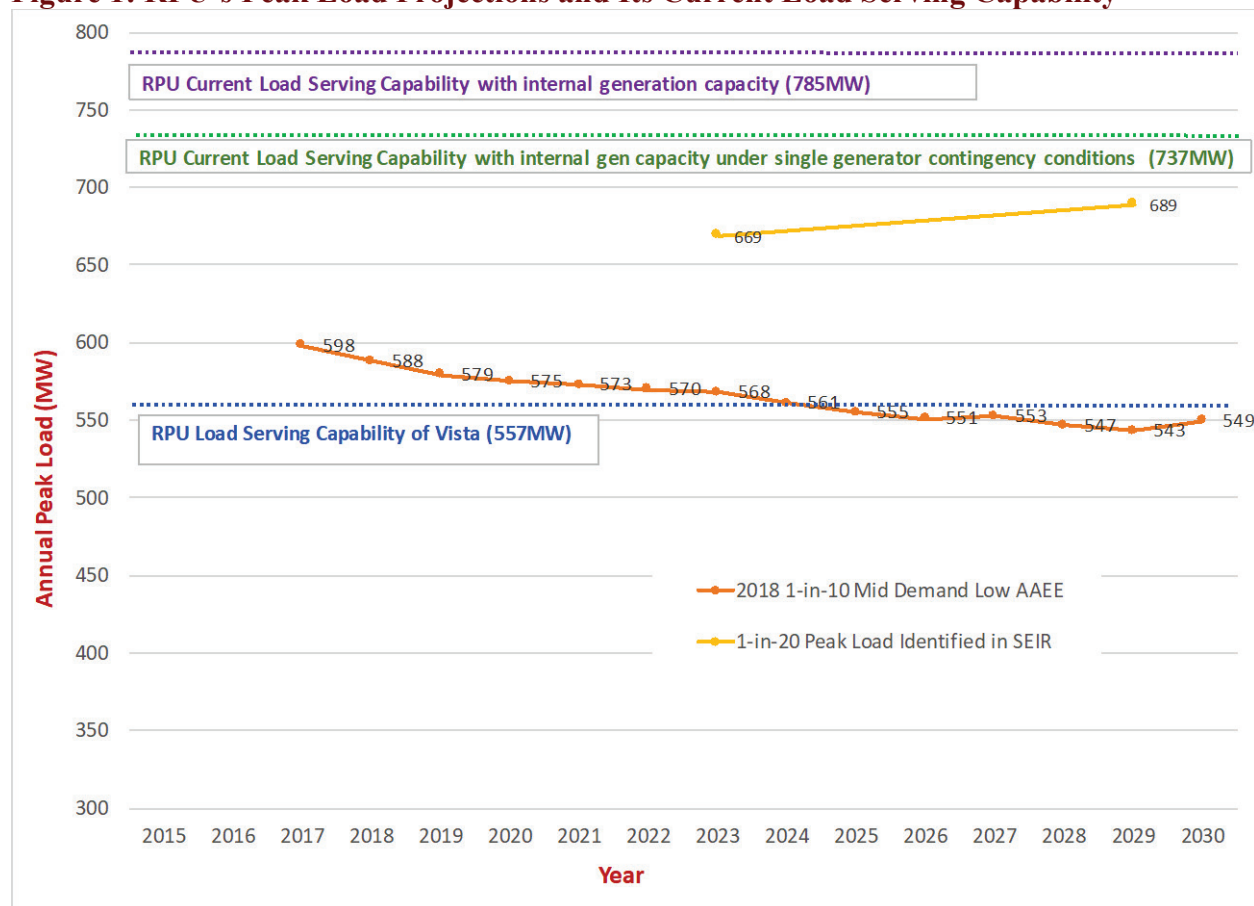
<sup>3</sup> DSEIR, p. 1-13, and Lower Voltage Report, pp. 17, 37 and 105.

<sup>4</sup> Additional Achievable Energy Efficiency savings

<sup>5</sup> Additional Achievable photovoltaic adoptions

Integrated Energy Policy Report (IEPR), indicates that the RPU loads are declining through 2030 further reducing the need for increasing system capacity to meet RPU’s demand needs.

**Figure 1: RPU’s Peak Load Projections and Its Current Load Serving Capability**



This load data indicates that there is no need whatsoever to increase capacity to meet RPU’s existing electrical system demand and anticipated future load growth over the 10-year planning horizon.

The DSEIR identifies some operating constraints associated with RPU’s internal generation as reasons not to consider the current 228 MW of internal generation as part of the power supply that can meet existing and future demand. In particular, the number of hours these units can operate is limited to 1,200 hours per year by the South Coast Air Quality Management District (SCAQMD) permits and no more than two starts per day. The DSEIR concludes:

Due to the limitations in use of these “peaker” units they cannot be considered part of the base power supply for Riverside, and additional capacity is needed to meet the existing and future demand for system reliability.<sup>6</sup>

<sup>6</sup> DSEIR, p. 1-13.

However, such limitations are not unusual for resources that meet peak demand. Rather than clearly demonstrating how these emission-related operating constraints disallow RPU to use its internal generation in meeting its peak demand, DSEIR simply assumes that to be the case, without supporting analysis and contrary to experience to date. It is not evident from the DSEIR that RPU is currently unable to meet its existing load that is unmet by the Vista substation using its internal generation. And as shown in Figure 1 above, the CEC *1-in-10* peak load is expected to decrease going forward. TURN recommends that the Final EIR include a historical data analysis to test whether the RPU internal generation had any challenges whatsoever in supplying the load locally. To meet the future load growth, if any, TURN suggests undertaking a production cost modeling exercise that would consider all the operating constraints of the RPU internal generation including the emission restrictions.

### *No Demonstrable Need to Provide Additional Source of Bulk Power into the RPU Electrical System*

The DSEIR eliminates several project alternatives, viz. Alternative 13, Alternative 14, Alternative 15, Alternative 16, Alternative 17, Alternative 21, Alternative 22, and the *No Project* Alternative on the ground that they “would not add a second source of bulk power to Riverside at the scale that is needed to address the loss of power at Vista.”<sup>7</sup> The DSEIR also indicates that “a second source of power is required to create redundancy in the system in case there is damage to RPU’s dedicated transformer banks at Vista Substation.”<sup>8</sup> The DSEIR is essentially only considering project alternatives that would incrementally supply a minimum of 489 MW of capacity by 2023, ramping up to 554 MW by 2038. This would mean, under the alternatives retained in the DSEIR, to serve the expected load of 669MW and 734MW, respectively, RPU will have an overall load serving capability of 1,226MW (=489+737) and 1,291 MW (554+737) in the 5-year and 20-year planning horizons, which is unreasonably high.

The objective of assuming no RPU reliance whatsoever on Vista Substation well-exceeds the NERC and CAISO transmission planning standards. NERC TPL-001-4 identifies the loss of a switching station or substation (loss of one voltage level plus transformers) as an Extreme Event. Only when Extreme Events may result in Cascading shall an evaluation of possible actions designed to reduce the likelihood or mitigate the consequences and adverse impacts of the event(s) be conducted.<sup>9</sup> Note that, even in this case, the NERC requirement is for evaluation and not necessarily for mitigation. For other situations where loss of the entire station is the result of an extreme event, the CAISO Planning Standards indicate some improvement in service “may be justified by eliminating or reducing load outage exposure, through a benefit to cost ratio (BCR) above 1.0 and/or where there are other extenuating circumstances.”<sup>10</sup> For this Project, no such BCR calculation nor explanation of unique extenuating circumstances has been presented.

Concerning extenuating circumstances, there are multiple other substations within the CAISO control area that are operated without any redundant sources. Therefore, SCE needs to provide a rationale for requiring reliability for RPU well above what is the norm on the CAISO system. In

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<sup>7</sup> DSEIR, pp. 3-14 through 3-17.

<sup>8</sup> DSEIR, p. 1-13.

<sup>9</sup> NERC TPL-001-4 Requirement 3.5

<sup>10</sup> California ISO Planning Standards Nov 2, 2017, Section 5.4



addition, there are additional SCE transformers at Vista substation that can be paralleled with the existing transformers serving Riverside load in case of an outage on the transformers<sup>11</sup>. The DSEIR should only eliminate an alternative if following the procedure described in the Draft EIR<sup>12</sup> fails to relieve the thermal overload on the transformer(s) due to normal planning contingencies. Moreover, the DSEIR should describe and evaluate additional low voltage alternative(s) that transfer enough load among the Vista transformers so as to keep the Vista transformers from overloading following a loss of a transformer.

Therefore, the project alternatives should not be eliminated on the basis of such a stringent and unnecessary project objective that exceeds normal planning practices without justifying why this project presents unique extenuating circumstances.

## **Conclusion**

TURN 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 be 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.

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<sup>11</sup> City of Riverside, Draft EIR, October 2012, p. 1-17.

<sup>12</sup> *Ibid.*

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## Power Line

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**Denise McQuillan** <deniece9.csea@gmail.com>  
To: riversidetrp@panoramaenv.com

Tue, May 15, 2018 at 4:07 PM

No

Denise H. McQuillan  
Secretary  
CSEA Alvord Chapter #339  
951 850-1270 cell #  
951 710-9622 office#

*Be Kind to Each Other and Especially to Yourself, You Are the One and Only You.*



Virus-free. [www.avg.com](http://www.avg.com)

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

I am writing to express my support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. With Riverside serving as the economic driver in one of fastest growing regions in the country, RTRP provides a viable, long term energy reliability solution to ensure continued prosperity into the future.

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

With recent business expansion in Riverside, including the \$414 million California Air Resources Board emissions testing facility, providing long-term transmission capacity via this proposal will play a pivotal role in attracting and retaining businesses to the region.

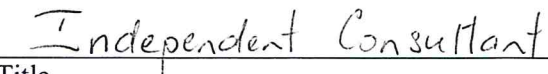
In 2006, the California Independent System Operator ordered Southern California Edison to establish a secondary connection to match the reliability neighboring cities currently enjoy. If approvals are received, the new connection would be built and energized in 2023. Bringing the second connection on-line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

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

Respectfully,



Name



Title



Company



May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,

JAVIER BARRUELOS   
Name  
Business Mgr.  
Title  
Amazon Paint.  
Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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

Respectfully,

Ulrich Mikosch Baumann

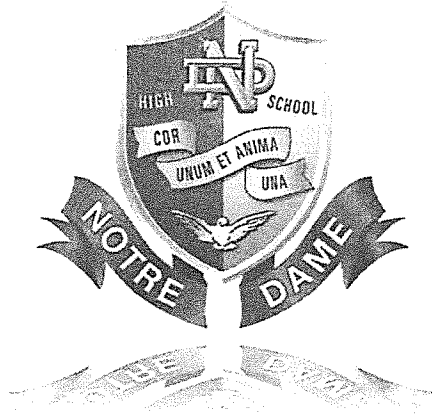
Name

CFO

Title

Helping Hands In-Home Care

Company



On behalf of Notre Dame High School and Riverside Catholic Schools, I hereby express **support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line and a new 230kV electrical substation. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside's 326,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals/trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands.

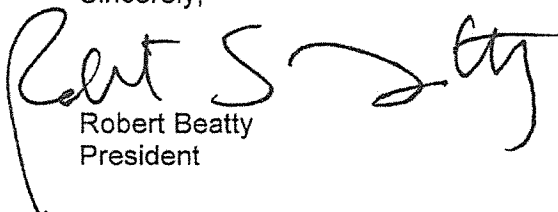
RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, Notre Dame High School and Riverside Catholic Schools respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [rbeatty@ndhsriverside.org](mailto:rbeatty@ndhsriverside.org) or 951.275.5868.

Sincerely,

  
Robert Beatty  
President

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

I am writing to express my support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. With Riverside serving as the economic driver in one of the fastest growing regions in the country, RTRP provides a viable, long term energy reliability solution to ensure continued prosperity into the future.

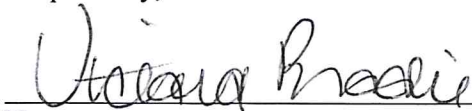
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For these reasons, I respectfully request your full support and approval of the RTRP Hybrid Proposal. Thank you for your consideration.

Respectfully,



Name

Title



Company



May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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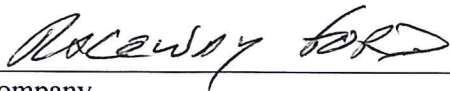
Respectfully,



Name



Title



Company

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California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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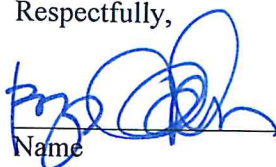
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For these reasons, I respectfully request your full support and approval of the RTRP Hybrid Proposal. Thank you for your consideration.

Respectfully,

  
Name ROGER CLARKE

PRESIDENT  
Title

RUHMAN CLARKE Architects  
Company

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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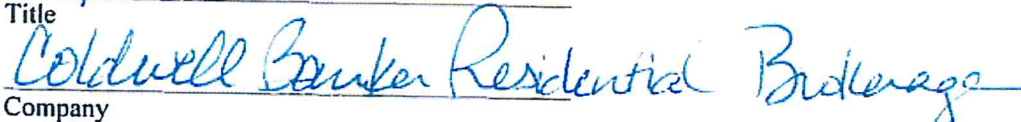
Respectfully,



Name



Title



Company

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,

Sergio Cortez  
Name

Vice President  
Title

NIR Plumbing Inc  
Company



May 16, 2018

**VIA E-MAIL AND**  
**FIRST CLASS MAIL**

Mr. Jensen Uchida  
CPUC Project Manager  
c/o Panorama Environmental, Inc.  
717 Market Street, Suite 650  
San Francisco, CA 94103

Re: Comments to Subsequent Environmental Impact Report

Dear Mr. Uchida:

As you know from prior correspondence, our office represents Sky Country Investment Co/East, LLC, ("SKE") the owner of property directly impacted by the proposed Revised Project for the Riverside Transmission Reliability Project ("RTRP"). SKE's holdings consist in part of County Assessor Parcel Nos. 160-060-023, 160-050-021, and 160-050-073 ("SKE Property"). Under the Revised Project, portions of the SKE Property are proposed as the site for two of the four riser poles transitioning the Revised Project's underground facilities to above-ground overhead wires. According to the SEIR, these poles will be approximately 165 feet in height, ten feet in diameter, will be spaced approximately 150 feet apart, and will require approximately one half of an acre of total work area for installation. (SEIR, pp. 2-14-15.)

A photo depiction of the type of the impact these massive structures will have on the property was included with Southern California Edison's Underground Alternatives Desktop Study of July 2015, provided as Attachment 6 in response to The CPUC's Deficiency Report, at p. 28:

*[See Following Page]*

Mr. Jensen Uchida  
May 16, 2018  
Page 2



Obviously SKE does not want these huge, disruptive electrical infrastructure facilities on its property. That is why SKE is grateful to the CPUC, and Panorama Environmental in particular, for the effort and attention that has gone into the preparation of the SEIR, and its analysis of alternatives. SKE is particularly gratified that the environmentally superior alternative (apart from the “No Project” alternative) is Alternative 1, the proposal for undergrounding the RTRP in Pats Ranch Road. (SEIR, p. 6-26.) SKE has long advocated undergrounding the RTRP as the superior solution to the host of difficult environmental issues raised by the Revised Project, and appreciates the SEIR analysis that proves its environmental preferability.

Mr. Jensen Uchida  
May 16, 2018  
Page 3

SKE does have a few minor points of comment on other aspects of the SEIR, however. Specifically, the aesthetic impacts of Alternative 3 are understated. While the aesthetic impact of Alternative 3 is still recognized as significant (SEIR, p. 4.1-53), SKE takes issue with the characterization of Alternative 3 impacts from Key Observation Points 5 and 6 as less than significant, and that overall visual impact would be reduced. (SEIR p. 5-47.) The mere relocation of these massive riser poles from adjacent to Limonite (as proposed with the Revised Project) to a point further north, adjacent to the I-15, does nothing to ameliorate their negative aesthetic impact. Alternative 3 still places those structures within the Limonite Avenue gateway for both the City of Jurupa Valley and Eastvale. (SEIR p. 4.1-13.) In fact, Alternative 3 makes these poles more aesthetically intrusive due to their proximity to a far greater number of motorists, given the relative traffic counts between Limonite Avenue and the I-15 freeway. SEIR pp. 4-13-6-7 fix the I-15 average traffic counts at between 148,000 and 151,000, while Limonite counts are a fraction of this at 30,973 to 42,196.<sup>1</sup> When examining cumulative aesthetic impacts, the SEIR concludes that the effects of “industrialization” and “urbanization” extend for a mile from project structures or construction effects. (SEIR, p. 5-14.) Because Alternative 3 moves the riser poles less than that distance from KOP 5 and 6, the SEIR’s characterization of reduced visual impact from these vantage points is internally inconsistent.

Further, Key Observation Points numbers 5 and 6 are well removed from the Alternative 3 proposed location for the riser poles, which SKE believes artificially softens the burdensome visual impact these mammoth structures will create. SKE believes that relocation of the riser poles to Alternative 3’s location will cause significant impacts to future developability of the SKE Property, resulting in cumulative land use compatibility impacts.

In addition, SKE believes that mitigation measure AES-01 is impermissibly vague, because there is no specific standard for mitigation specified. The only limitation appears to be mitigation “to the extent practical.” (SEIR, p. 9-9.) A specific mitigation standard, measureable and enforceable, is required here.

Last, SKE believes the SEIR needs to examine recent activity and proposals affecting the Hidden Valley Wildlife Preserve Area. SEIR pp. 4.9-11 through 17 discuss this, but appear to proceed from a false premise regarding the Revised Project. The SEIR presumes that the only impacts to the Hidden Valley Wildlife Area will be the proposed distribution line relocation number 7, which is presupposed to be undergrounded. The SEIR concludes that because this line

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<sup>1</sup> Other traffic counts done for the County of Riverside are in accord. In the County’s Draft Environmental Impact Report, section 4.18 “Transportation and Circulation” daily volumes for Limonite Avenue between Wineville Avenue and 0.1 miles east of Beach Street was calculated at 18,400 average daily trips. This compares to 145,000 for the I-15 between Limonite Avenue and Cantu Galleano Ranch Road. (County of Riverside Environmental Impact Report No. 521, Public Review Draft, February 2015, pp. 4.18-17; 4.18-51.)

Mr. Jensen Uchida  
May 16, 2018  
Page 4

would be buried under ground, and underground utilities are compatible with the LWCF Act, no impact would occur. (SEIR p. 4.9-17.)

Recent events indicate otherwise. The Riverside County Regional Park and Open-Space District (“RivCoParks”) on March 23, 2018, invited public comment regarding a proposed Hidden Valley Wildlife Area boundary change. A copy of this notice is attached under TAB 1. According to the notice, RivCoParks is apparently cooperating with RTRP plans that contemplate significantly more intrusive facilities through the Hidden Valley Wildlife Area than simply undergrounding a distribution line. That notice references, “[n]ew access roads, steel lattice and pole structures, and a 100-foot right-of-way . . . that would be established within the HVWA.” The notice likewise proposes a 10.8 acre boundary change, which SKE understands would have to be approved by the National Park Service. (See, SEIR, p. 4.12-7.) If so, the list of discretionary approvals for which the SEIR may be used would have to be expanded.

This HVWA conversion proposal has generated significant public controversy, and our office corresponded with RivCoParks regarding it on April 20, 2018. A copy of that letter is attached under TAB 2. The City of Jurupa Valley is also deeply troubled by this proposal, and submitted its own letter on April 23, 2018, a copy of which is attached under TAB 3.

The very existence of the SEIR is premised on CEQA Regulations section 15162, and recognition that when there are substantial changes to a proposed project requiring major revisions to address new, significant environmental impacts, additional analysis is required. In the same vein, RivCoParks’s recent modification to the RTRP Project means our work is still not done. The RivCoParks proposal to devote over 10 acres of HVWA recreational property as the site for new overhead lines and “steel lattice and pole structures,” requires additional environmental analysis, and identification and discussion of additional mitigation measures. These must be folded into the SEIR, prior to its certification.

SKE recognizes that proper CEQA consideration of this new wrinkle in the RTRP proposal may delay final environmental certification. Still, the inconsistency between what RivCoParks now proposes for RTRP in the HVWA, and the presumptions regarding HVWA impacts stated in the SEIR to the effect that only undergrounded distribution lines are implicated (SEIR p. 4.12-8), cannot stand. The SEIR speaks of 1.06 acres of disturbance in HVWA for Line 7, and 1.36 in the Santa Ana River Wildlife Area for distribution Line 8. (SEIR 4.12-17.) RivCoParks is now talking about 10.8 acres of conversion for HVWA alone, which “would be permanently utilized for electrical transmission infrastructure.” This inconsistency must be reconciled.

The RTRP project, should it ever be built, will install intrusive utility infrastructure whose negative impacts will span multiple decades. Given the apparently evolving nature of the Revised Project proposal, taking additional time to finalize environmental review in a proper and thorough manner is justified.

Mr. Jensen Uchida  
May 16, 2018  
Page 5

SKE appreciates the opportunity to comment on the SEIR. Again, SKE is grateful for the diligence and efforts that went into the preparation of the document, and the receptive ear lent to scoping session and other community concerns expressed regarding the Revised Project. SKE looks forward to utilizing the SEIR as a basis for urging selection of environmentally superior alternatives to the Revised Project.

Very truly yours,

RUTAN & TUCKER, LLP



David B. Cosgrove

DBC:mrs  
Enclosures

**TAB 1**

**TAB 1**





## Riverside County Regional Park and Open-Space District

Scott Bangle, Parks Director/General Manager | Kyla Brown, Assistant Director

RECEIVED

MAR 27 2018

CITY OF JURUPA VALLEY

March 23, 2018

### REQUEST FOR PUBLIC COMMENT

#### REGARDING HIDDEN VALLEY WILDLIFE AREA BOUNDARY CHANGE

The Riverside Transmission Reliability Project (RTRP) is a high-voltage utility project jointly proposed by Southern California Edison (SCE) and Riverside Public Utilities (RPU) currently undergoing review by the California Public Utilities Commission (CPUC). The Project as proposed would consist of approximately eight (8) miles of overhead and approximately two (2) miles of underground 230 kV transmission line, as well as 69 kV subtransmission lines and other facility upgrades.

The RTRP would cross portions of the Hidden Valley Wildlife Area (HVWA), managed by the Riverside County Regional Park and Open Space District (County Parks), on the south side of the Santa Ana River in several locations. New access roads, steel lattice and pole structures, and a 100-foot right-of-way would be established within the HVWA. The affected HVWA lands were funded, in part, under the Land and Water Conservation Fund (LWCF), a federal program that provides funds to local and other agencies for the acquisition of public recreation land. Conversion of these lands to non-recreation uses (e.g. utility infrastructure) requires review and approval by the National Park Service (NPS), and the acquisition of "replacement" lands to offset Project impacts. Submittal of a Project Description-Environmental Screening Form by the sponsoring agency (County Parks) and appropriate National Environmental Policy Act (NEPA) environmental review is required by the NPS as part of this Conversion Area and Replacement proposal review process.

The RTRP would affect approximately 10.8 acres of HVWA LWCF funded lands in three (3) general locations (see Figure 1). These "Conversion Areas" would be permanently utilized for electrical transmission infrastructure. A similarly sized contiguous portion of a parcel (#153240030-6), owned by the City of Riverside and Riverside County and located near the park's entrance road north of Arlington Avenue, would be incorporated into the HVWA to compensate for the loss of recreational function within the park, expanding its area by approximately 10.6 acres. No zone change is proposed as a result of the Conversion Area and Replacement proposal.

During project siting and as detailed in the project's (Draft and Final) Environmental Impact Report (EIR) developed in accordance with the California Environmental Quality



March 23, 2018

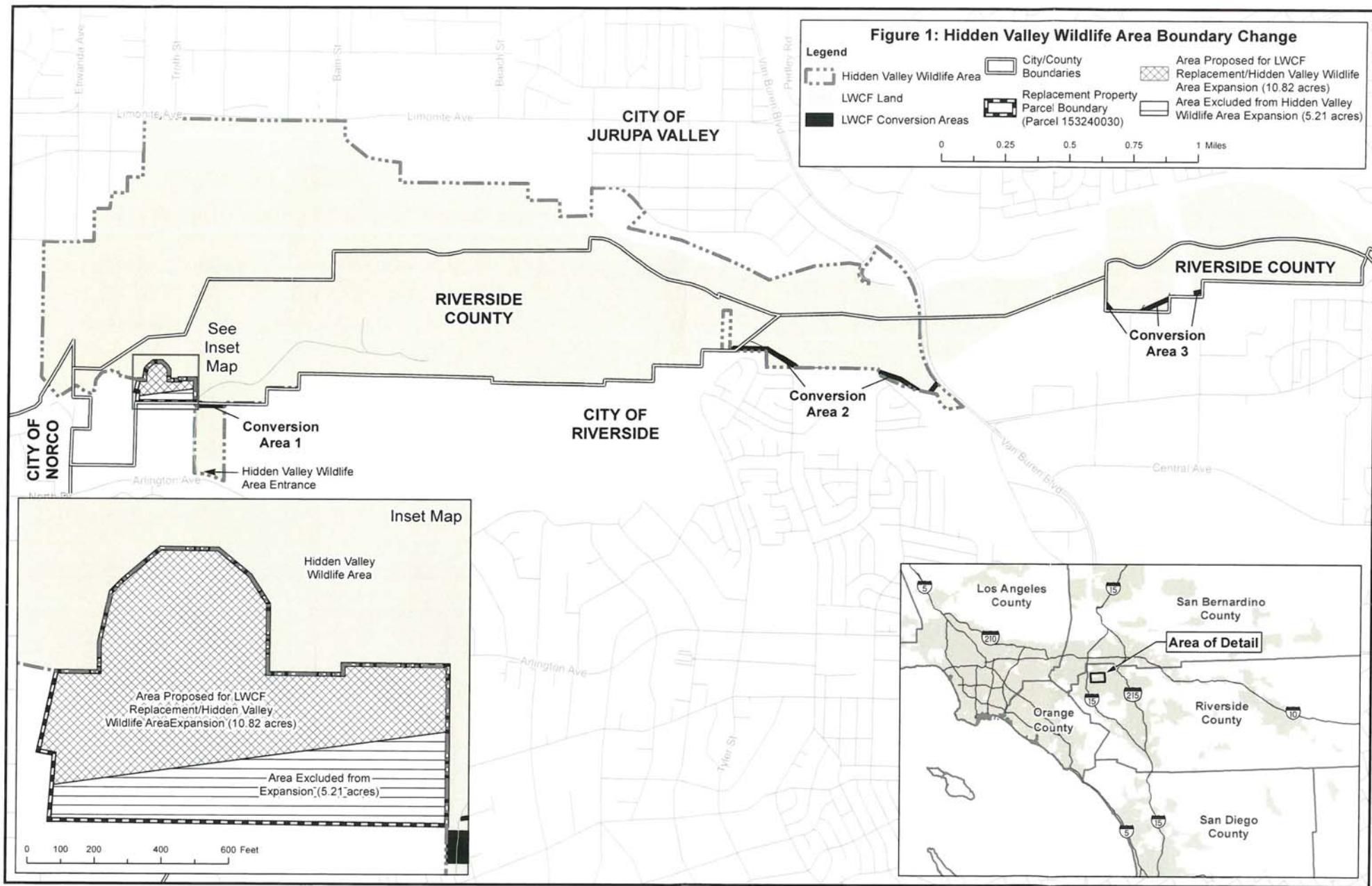
Act (CEQA), impacts on LWCF lands and other resources were avoided to the extent possible, and an extensive public involvement process was included as part of project planning. The NEPA environmental review conducted by the NPS for Conversion Area and Replacement proposal will be available for public review when it is completed. More details regarding project planning and previous public involvement activities are available on the CPUC's website at:  
<http://www.cpuc.ca.gov/Environment/info/panoramaenv/RTRP/>

County Parks is encouraging interested and affected agencies and members of the public to provide input on the proposed conversion, replacement and expansion of the HVWA by April 23, 2018. Comments may be submitted by the following methods:

By email to: [RTRP-LWCF@powereng.com](mailto:RTRP-LWCF@powereng.com)

By mail to: Riverside County Regional Park and Open Space District - c/o Darrin Gilbert.  
POWER Engineers, 731 East Ball Road, Anaheim, CA 92805





**TAB 2**

**TAB 2**

April 20, 2018

Riverside County Regional Park  
and Open Space District  
c/o Darrin Gilbert  
POWER Engineers  
731 East Ball Road  
Anaheim, CA 92805

Re: Proposed Hidden Valley Wildlife Area Boundary Change

Dear Mr. Gilbert:

I am writing in response to the "Request for Public Comment regarding Hidden Valley Wildlife Area Boundary Change," dated March 23, 2018 ("Notice"), issued by Riverside County Regional Park and Open Space District ("RivCoParks"). Our office represents a number of property owners whose property will be directly impacted by the proposed Riverside Transmission Reliability Project ("RTRP"), and who oppose it.<sup>1</sup> We believe the proposed boundary change is ill-advised, and very likely contrary to law. We encourage RivCoParks to reject it outright.

First, as a procedural matter, we believe the comment period which was proposed to close on April 23, 2018 must be extended. We understand the e-mail address to which comments were supposed to be directed by the Notice - "RTRP-LWCF@powereng.com", was not accepting e-mails from unknown addresses. An e-mail request I made for information regarding the proposal on April 17, 2018 apparently did not go through, and was only recognized because I copied RivCoPark's General Manager, Scott Bangle, who I understand made Power Engineers aware of the issue. If my e-mail did not go through, I suspect I am not alone, and it seems reasonable to assume there may have been no e-mail reception of any comments made from 3-23-18 until at least 4-17-18. The thirty day comment period should be reset, and we ask that this be done.<sup>2</sup>

<sup>1</sup> My clients are Sky Country Investment Company/East LLC, and the trustees of the Anthony P. Vernola Trust Dated October 18, 2000 and the Pat and Mary Ann Vernola Trust; Marital Trust. The points raised herein apply to any person who uses the Hidden Valley Wildlife Area, or is interested in its preservation, however.

<sup>2</sup> This e-mail snafu calls up the broader question why comments solicited by RivCoParks are being directed to an engineering consulting firm, Power Engineers. Power Engineers' website lists Riverside Public Utilities, the project applicant on RTRP, as one of its clients. With all due respect, routing comments on a proposed government action relating to a park and wildlife area, to a consultant who assists in the building of overhead power lines, hardly



Riverside County Regional Park and Open  
Space District  
April 20, 2018  
Page 2

Turning then to the merits, our first objection is that the proposed boundary change is inconsistent with the County of Riverside's 2017 General Plan. The Hidden Valley Wildlife Area ("HVWA"), which is the subject of the proposed boundary change, lies within the Open Space-Conservation Habitat ("OS-CH") designation. That designation applies to public and private lands to be conserved and managed in accordance with adopted MSHCPs. It allows ancillary structures or uses only for the purpose of preserving or enjoying the open space. (County of Riverside General Plan, July 11, 2017, Page LU-55.)

Removing property from an established land preserve, to facilitate a major, intrusive utility infrastructure installation, is inimical to this "Conservation" designation, and its purposes. We fail to see how paving the way (literally) for a 230 KV transmission line, solely for the benefit of the residents of the City of Riverside, serves the purpose of County residents for preserving or enjoying the Hidden Valley Wildlife Area for open space.

We also note that the Draft Environmental Impact Report for RTRP, from August 2011, pointed up Open Space policies from the 2003 Riverside County General Plan, which included OS 20.2: "Prevent unnecessary extension of public facilities, services, and utilities, for urban uses, into open space conservation designated areas." (RTRP EIR. pp. 3-17-18.) While this particular general plan policy does not appear to have been carried forward in identical form in the July 11, 2017 version, the current plan still defines preservation of open space as one of the key land use policies of the County: "Due to increasing growth pressures, there is danger that the quality and character of some open space areas may be diminished. The balance between accommodating future growth and preserving the quality of Riverside County's open spaces is one of the most challenging and volatile issues in the county." (General Plan, July 11, 2017, p. LU-53.) The General Plan also states: "The County of Riverside has a commitment to ensuring that open spaces remain an integral part of Riverside County's future and are protected through the policies of the General Plan[.]" (*Id.*) The spirit of the policy of protecting habitat areas therefore remains, and we believe frames the paramount responsibility of RivCoParks in approaching this boundary change proposal.

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inspires confidence in objectivity.

Riverside County Regional Park and Open  
Space District  
April 20, 2018  
Page 3

We also call attention to Land Use Policy 7.2 from the July 11, 2017 General Plan, which indicates that public facilities may be allowed “in any other land use designation ***except for the open space-conservation and open space-conservation habitat land use designations.***” From this, it is clear that the RTRP is manifestly incompatible with the OS-CH Land Use Designation for the HVWA, and therefore, directly contrary to the County’s General Plan.

As the district charged with the protection and stewardship of HVWA’s important natural resources, we encourage RivCoParks to stay true to the long-standing policy of preventing unnecessary extension of public facilities into open space conservation areas, and to reject this boundary change.

Further, the RTRP project proponents themselves are already on record admitting that the negative environmental effects of their proposed high voltage wires on the HVWA are significant. The RTRP Environmental Impact Report from August 2011, at pp. 3-309 - 310 specifically says the environmental consequences its project visits on this important natural area are significant, but goes on to allege that they are unavoidable. The justification for this improbable assertion was the alleged infeasibility of undergrounding any segment of the RTRP whatsoever. (*Id.*)

Wrong. As subsequent events have transpired, the RTRP project proponents have not only considered, but actually agreed, to underground segments of the RTRP. In fact, the Subsequent Environmental Impact Report prepared on the RTRP by the California Public Utilities Commission, and released just this month, states: “ In September 2016, SCE revised the Proposed Project to relocate a portion of the transmission line and to change the design of a segment of the transmission line from overhead to underground.” (SEIR, April, 2018, p. 1-1.) The project proponents’ own conduct therefore disproves the fundamental premise on which their prior EIR shrugged off the environmental effects on HVWA.

It is unclear on what environmental review RivCoParks proposes to base any action it may initiate to implement the HVWA boundary change.<sup>3</sup> The Notice references the prior RTRP EIR, but also references an Environmental Assessment under NEPA, ostensibly to cover the anticipated Federal action that will ultimately be required from the National Park Service to effectuate the boundary change. To the extent that RivCoParks intends to

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<sup>3</sup> This question was touched upon in my April 17, 2018 e-mail, but has not yet been answered.



Riverside County Regional Park and Open  
Space District  
April 20, 2018  
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participate in future NEPA analysis, any action it may take now, without referencing or making publicly available that analysis, is premature.

To the extent that RivCoParks intends to utilize the RTRP EIR, however, that analysis is now obsolete. At a minimum, the change in the RTRP project, which now includes undergrounding, triggers the need for additional environmental review under CEQA pursuant to *Title 14, California Code of Regulations*, § 15162. That regulation provides, in pertinent part, that subsequent environmental analysis is required whenever any of the following appear:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on

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the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(14 Cal. Code Regs. § 15162(a).)

The project proponents' admission that undergrounding is not only possible, but preferable, on various project segments is certainly a substantial change in the "circumstances under which the project is undertaken," since the fundamental premise on which the HVWA impacts were previously deemed "unavoidable" no longer are. The California Public Utilities Commission has already deemed the prior RTRP EIR inadequate on segments around the I-15 and Limonite, and in fact has identified additional undergrounding as the environmentally superior alternative, after the "no project" alternative. Undergrounding through the HVWA must therefore now be analyzed, both for its environmental impact, and its feasibility, before the boundary change can proceed. So, we believe, should alternative alignments that avoid the HVWA altogether.

Moreover, we understand that ultimately, the National Parks Service, acting by and through the Pacific West Regional Office and its administration of the Land and Water Conservation Fund ("LWCF"), will have to review and pass on this proposed boundary change. The proposal will have to comply with 36 CFR § 59.3, "Prerequisites for Conversion Approval." A copy of the text of that regulation is attached.

Here, we have serious concerns whether the requirements of that federal regulatory provision can be met.

First, subsection (b)(1) of that regulation requires that all practical alternatives have to be evaluated. We see little record of consideration of any alternatives that would avoid the HVWA, nor undergrounding the facilities if the alignment through HVWA is unavoidable, to avoid permanent, long-term visual scarring and the intrusion from constant maintenance, operation, and repair activity that are endemic to overhead electrical transmission lines.

Second, subsection (b)(2) indicates it must be demonstrated that the substitute property coming back in the exchange is of at least the fair market value as that to be provided, pursuant to uniform federal appraisal standards. Has an appraisal assessing comparative values been prepared? If appraisal studies have been undertaken, they should be made available for public review, analysis, and critique.

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Subsection (b)(3) requires that the proposed replacement property must be of reasonably equivalent use from that being converted. Here, we question whether any such finding can be made. According to the map attached to the Notice, the “Conversion Areas” span a total seven distinct portions of the HVWA, all of which contribute to the present integrity of the preserve. It has not been explained how replacement of these areas with the “area proposed for LWCF replacement” will serve a similar or higher function as these converted areas.

Perhaps most impactful, 36 CFR § 59.3(b)(5) requires, in the case of assisted sites which are partially rather than wholly converted, the impact of the converted portion on the remainder shall be considered. Here, more than anywhere else, the proposed boundary change fails. The RTRP will place gargantuan overhead utility structures through areas intended to be preserved as habitat. The obtrusiveness from a visual standpoint, as well as from a maintenance and operation standpoint, cannot be overstated. To demonstrate compliance with this regulatory requirement, (and to illustrate the real impacts of what is being proposed) we request RivCoParks to conduct a visual impact analysis, which should include physical marking of the proposed dimensions of the overhead utilities, in terms of both height and footprint. Only then will the true impacts through the remainder of the HVWA area be evident to all HVWA users, whose interests are most directly at stake.

These are just a few of the nine subsections in 36 CFR § 59.3(b) RivCoParks must meet to gain National Park Service approval of this deeply flawed boundary change proposal. We request that RivCoParks prepare written findings, reviewable for comment by the public, on all of the federal regulatory requirements, prior to taking any step to approve, endorse, or otherwise further the boundary change. Once that is done, we are confident that the proposed boundary change for HVWA will be proven to fall well short of federal regulatory requirements, in a number of respects. Further, we request RivCoParks fully and publically document its analysis of the view impacts, appraisal analyses, and comparative functionality of the areas to be severed from the existing preserve with the lands proposed to be provided. Only this will demonstrate to Riverside County park users the true impacts of what the City of Riverside is asking them to sacrifice for the City’s utility infrastructure goals.

In conclusion, RivCoParks’ consideration of the proposed boundary change to the HVWA is puzzling, even troubling. RivCoParks has as its mandate and its mission the preservation of wildlife habitat areas. This proposal flies directly in the face of that



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mission, and offers no tangible or demonstrated benefit to the park users RivCoParks is charged to defend. The City of Riverside's utility infrastructure goals are not the County of Riverside's responsibility, and certainly not when advanced at the cost of established wildlife habitat preserve areas. We strongly encourage RivCoParks to reject this proposal outright.

Thank you for the opportunity to comment.

Very truly yours,

RUTAN & TUCKER, LLP



David B. Cosgrove

DBC:tt  
Enclosure

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

Sierra Club, San Geronio Chapter  
PO Box 5425  
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Center for Community Action and Environmental Justice  
7701 Mission Blvd.  
Jurupa Valley, CA 92509



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## 36 CFR sec. 59.3

### § 59.3 Conversion requirements.

(a) *Background and legal requirements.* Section 6(f)(3) of the L&WCF Act is the cornerstone of Federal compliance efforts to ensure that the Federal investments in L&WCF assistance are being maintained in public outdoor recreation use. This section of the Act assures that once an area has been funded with L&WCF assistance, it is continually maintained in public recreation use unless NPS approves substitution property of reasonably equivalent usefulness and location and of at least equal fair market value.

(b) *Prerequisites for conversion approval.* Requests from the project sponsor for permission to convert L&WCF assisted properties in whole or in part to other than public outdoor recreation uses must be submitted by the State Liaison Officer to the appropriate NPS Regional Director in writing. NPS will consider conversion requests if the following prerequisites have been met:

(1) All practical alternatives to the proposed conversion have been evaluated.

(2) The fair market value of the property to be converted has been established and the property proposed for substitution is of at least equal fair market value as established by an approved appraisal (prepared in accordance with uniform Federal appraisal standards) excluding the value of structures or facilities that will not serve a recreation purpose.

(3) The property proposed for replacement is of reasonably equivalent usefulness and location as that being converted. Dependent upon the situation and at the discretion of the Regional Director, the replacement property need not provide identical recreation experiences or be located at the same site, provided it is in a reasonably equivalent location. Generally, the replacement property should be administered by the same political jurisdiction as the converted property. NPS will consider State requests to change the project sponsor when it is determined that a different political jurisdiction can better carry out the objectives of the original project agreement. Equivalent usefulness and location will be determined based on the following criteria:

(i) Property to be converted must be evaluated in order to determine what recreation needs are being fulfilled by the facilities which exist and the types of outdoor recreation resources and

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opportunities available. The property being proposed for substitution must then be evaluated in a similar manner to determine if it will meet recreation needs which are at least like in magnitude and impact to the user community as the converted site. This criterion is applicable in the consideration of all conversion requests with the exception of those where wetlands are proposed as replacement property. Wetland areas and interests therein which have been identified in the wetlands provisions of the Statewide Comprehensive Outdoor Recreation Plan shall be considered to be of reasonably equivalent usefulness with the property proposed for conversion regardless of the nature of the property proposed for conversion.

(ii) Replacement property need not necessarily be directly adjacent to or close by the converted site. This policy provides the administrative flexibility to determine location recognizing that the property should meet existing public outdoor recreation needs. While generally this will involve the selection of a site serving the same community(ies) or area as the converted site, there may be exceptions. For example, if property being converted is in an area undergoing major demographic change and the area has no existing or anticipated future need for outdoor recreation, then the project sponsor should seek to locate the substitute area in another location within the jurisdiction. Should a local project sponsor be unable to replace converted property, the State would be responsible, as the primary recipient of Federal assistance, for assuring compliance with these regulations and the substitution of replacement property.

(iii) The acquisition of one parcel of land may be used in satisfaction of several approved conversions.

(4) The property proposed for substitution meets the eligibility requirements for L&WCF assisted acquisition. The replacement property must constitute or be part of a viable recreation area. Unless *each* of the following additional conditions is met, land currently in public ownership, including that which is owned by another public agency, may not be used as replacement land for land acquired as part of an L&WCF project:

(i) The land was not acquired by the sponsor or selling agency for recreation.

(ii) The land has not been dedicated or managed for recreational purposes while in public ownership.

(iii) No Federal assistance was provided in the original acquisition unless the assistance was provided under a program expressly authorized to match or supplement L&WCF assistance.

(iv) Where the project sponsor acquires the land from another public agency, the selling agency must be required by law to receive payment for the land so acquired.

In the case of development projects for which the State match was not derived from the cost of the purchase or value of a donation of the land to be converted, but from the value of the development itself, public land which has not been dedicated or managed for



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recreation/conservation use may be used as replacement land even if this land is transferred from one public agency to another without cost.

(5) In the case of assisted sites which are partially rather than wholly converted, the impact of the converted portion on the remainder shall be considered. If such a conversion is approved, the unconverted area must remain recreationally viable or be replaced as well.

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

(7) The guidelines for environmental evaluation have been satisfactorily completed and considered by NPS during its review of the proposed 6(f)(3) action. In cases where the proposed conversion arises from another Federal action, final review of the State's proposal shall not occur until the NPS Regional office is assured that all environmental review requirements related to that other action have been met.

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

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

(c) *Amendments for conversion.* All conversions require amendments to the original project agreements. Therefore, amendment requests should be submitted concurrently with conversion requests or at such time as all details of the conversion have been worked out with NPS. Section 6(f)(3) project boundary maps shall be submitted with the amendment request to identify the changes to the original area caused by the proposed conversion and to establish a new project area pursuant to the substitution. Once the conversion has been approved, replacement property should be immediately acquired. Exceptions to this rule would occur only when it is not possible for replacement property to be identified prior to the State's request for a conversion. In such cases, an express commitment to satisfy section 6(f)(3) substitution requirements within a specified period, normally not to exceed one year following conversion approval, must be received from the State. This commitment will be in the form of an amendment to the grant agreement.

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(d)*Obsolete facilities.* Recipients are not required to continue operation of a particular facility beyond its useful life. However, when a facility is declared obsolete, the site must nonetheless be maintained for public outdoor recreation following discontinuance of the assisted facility. Failure to so maintain is considered to be a conversion. Requests regarding changes from a L&WCF funded facility to another otherwise eligible facility at the same site that significantly contravene the original plans for the area must be made in writing to the Regional Director. NPS approval must be obtained prior to the occurrence of the change. NPS approval is not necessarily required, however, for each and every facility use change. Rather, a project area should be viewed in the context of overall use and should be monitored in this context. A change from a baseball field to a football field, for example, would not require NPS approval. A change from a swimming pool with substantial recreational development to a less intense area of limited development such as a passive park, or vice versa, would, however, require NPS review and approval. To assure that facility changes do not significantly contravene the original project agreement, NPS shall be notified by the State of *all* proposed changes in advance of their occurrence. A primary NPS consideration in the review of requests for changes in use will be the consistency of the proposal with the Statewide Comprehensive Outdoor Recreation Plan and/or equivalent recreation plans. Changes to other than public outdoor recreation use require NPS approval and the substitution of replacement land in accordance with section 6(f)(3) of the L&WCF Act and paragraphs (a) through (c) of this section.

[ 51 FR 34184, Sept. 25, 1986, as amended at 52 FR 22747, June 15, 1987]

**TAB 3**

**TAB 3**





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April 23, 2018

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

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

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

Dear Mr. Gilbert and Mr. Bangles:

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

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

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<sup>1</sup> The District's proposal to alter the boundaries of and convert lands within the HVWA is referred to as the "Project."

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

(36 C.F.R. § 59.3(b)(1)-(9).)

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

## VII. Conclusion

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

Very truly yours,



Stephen D. Lee

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

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

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

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

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

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

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

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

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

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

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

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

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

I am writing to express my support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. With Riverside serving as the economic driver in one of the fastest growing regions in the country, RTRP provides a viable, long term energy reliability solution to ensure continued prosperity into the future.

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

With recent business expansion in Riverside, including the \$414 million California Air Resources Board emissions testing facility, providing long-term transmission capacity via this proposal will play a pivotal role in attracting and retaining businesses to the region.

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

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

Respectfully,

Name

Title

Company

*Diana Perry*  
*President*  
*Sierra + Assoc. Engrs.*



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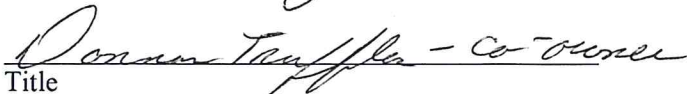
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For these reasons, I respectfully request your full support and approval of the RTRP Hybrid Proposal. Thank you for your consideration.

Respectfully,

  
Name

  
Title

  
Company

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,



Julio Figueroa  
Name

Director  
Title

AT&T  
Company

May 14, 2018

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San Francisco, CA 94103

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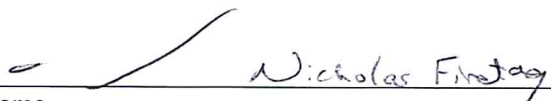
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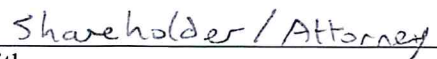
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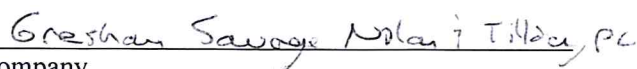
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Name

  
\_\_\_\_\_  
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\_\_\_\_\_  
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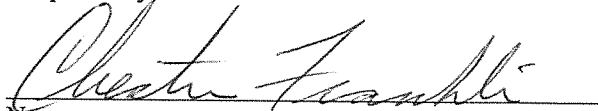
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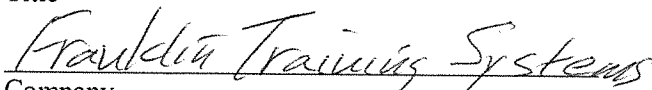
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Company



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San Francisco, CA 94103

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Respectfully,

Gen Ganes  
Name  
President  
Title  
General Door  
Company

May 14, 2018

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California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,

Chad Halliday

Name

Senior Manager/CPA

Title

Senger Lewick CPA's

Company

May 8, 2018



**Legendary Care™**

**Mailing Address**

3660 Arlington Ave.  
Riverside, CA 92506

**Riverside**

Main Campus  
7117 Brockton Ave.  
(951) 683-6370

7150 Brockton Ave.  
(951) 683-6370

Surgery Center  
7160 Brockton Ave.  
(951) 782-3801

**Corona**

818 Magnolia Ave.  
830 Magnolia Ave.  
(951) 683-6370

**Jurupa Valley**

6250 Clay St.  
(951) 683-6370

**Canyon Springs/  
Moreno Valley**

6405 Day St.  
(951) 683-6370

**Eastvale**

12742 Limonite Ave.  
(951) 683-6370

**Mission Grove**

19314 Jesse Lane  
Riverside, CA 92508

**Murrieta**

33040 Antelope Road  
Murrieta, CA 92563

On behalf of Riverside Medical Clinic, I hereby express support for the **Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line and a new 230kV electrical substation. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside's 326,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals/trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, Riverside Medical Clinic respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [vickie.haner@rmcps.com](mailto:vickie.haner@rmcps.com) or 951-782-5177.

Sincerely,

Director, Marketing & Business Development  
Riverside Medical Clinic



**Horn &  
Associates**

May 3, 2018

To Whom It May Concern,

On behalf of Horn & Associates, I **hereby express support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

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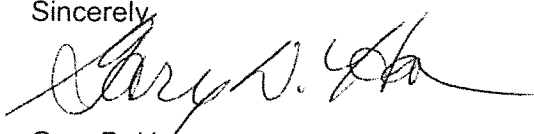
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As such, to ensure public safety and protect the economic future of Riverside, Horn & Associates respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [gary@horn-properties.com](mailto:gary@horn-properties.com).

Sincerely,



Gary D. Horn



May 3, 2018

On behalf of A-Check America, DBA A-Check Global, I **hereby express support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

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As such, to ensure public safety and protect the economic future of Riverside, A-Check Global respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at via the information provided in the signature line below.

Respectfully,



**Jennifer Humphreys**  
Administrative Manager  
**A-Check Global**  
+1 951-750-1412  
[jhumphreys@acheckglobal.com](mailto:jhumphreys@acheckglobal.com)  
[www.acheckglobal.com](http://www.acheckglobal.com)

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

I am writing to express my support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. With Riverside serving as the economic driver in one of the fastest growing regions in the country, RTRP provides a viable, long term energy reliability solution to ensure continued prosperity into the future.

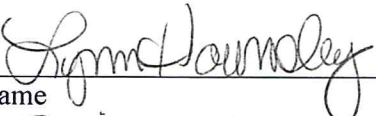
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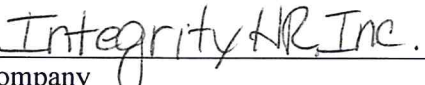
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For these reasons, I respectfully request your full support and approval of the RTRP Hybrid Proposal. Thank you for your consideration.

Respectfully,

  
\_\_\_\_\_  
Name

  
\_\_\_\_\_  
Title

  
\_\_\_\_\_  
Company

May 14, 2018

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California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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Respectfully,

MATTHEW IRVING

Name

CEO

Title

SYSTEMGO IT

Company

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San Francisco, CA 94103

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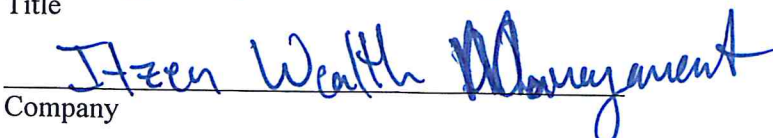
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Respectfully,

Deborah L. Johnson  
Name

Relationship mgr.  
Title

On Target Promotions  
Company

May 14, 2018

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California Public Utilities Commission  
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San Francisco, CA 94103

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Respectfully,

  
Name

Owner, President  
Title

Vantage Insurance Solutions  
Company

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Respectfully,

Cliff LeBlanc

Name

Marketing & Communications Manager

Title

GRID Alternatives

Company

Riverside CA



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San Francisco, CA 94103

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Respectfully,

Name

Title

Company

*Luc LeFevre*  
*Chairman Program / EVENTS*  
*SCORE Inland Empire*



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Respectfully,

Michael Linton  
Name

VP  
Title

Vulcan Materials Co.  
Company

May 14, 2018

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Respectfully,

Chris Cook

Name

CTO

Title

System Ge IT

Company



BABCOCK Laboratories, Inc.

*The Standard of Excellence for Over 100 Years*

May 3, 2018

Mr. George Hanson  
Assistant General Manager  
City of Riverside, Public Utilities

Dear Mr. Hanson,

Babcock Laboratories, Inc. is an environmental and food testing lab located in the City of Riverside. Uninterrupted power is vital to the ability of Babcock Labs to serve our clients including municipalities, water districts, and industry. The incubators and instrumentation we operate must run 24 hours a day, 7 days a week, to provide the daily analytical data that enables us to protect the public health and the environment.

On behalf of Babcock Laboratories, Inc., I **hereby express support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line and a new 230kV electrical substation. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside's 326,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals/trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, Babcock Laboratories, Inc. respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at 951-653-3351 or [amackenzie@babcocklabs.com](mailto:amackenzie@babcocklabs.com).

Sincerely,



Allison Mackenzie  
President & CEO

Mailing:  
P.O Box 432  
Riverside, CA 92502-0432

Location:  
6100 Quail Valley Court  
Riverside, CA 92507-0704

P 951 653 3351  
F 951 653 1662  
[www.babcocklabs.com](http://www.babcocklabs.com)

CA ELAP no. 2698  
ISO 17025:2005 no. 3232.01  
EPA no. CA00102

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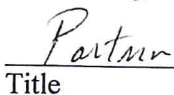
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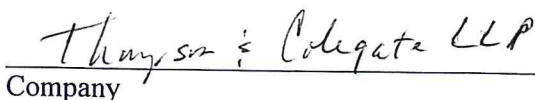
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Respectfully,

  
Name

  
Title

  
Company



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Respectfully,

WENDY McCool  
Name

MARKETING SPECIALIST  
Title

RIVERSIDE PHYSICIAN NETWORK  
Company

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California Public Utilities Commission  
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Respectfully,

VINCENT MCCOY

Name

DIRECTOR

Title

INLAND EMPIRE SPDC.

Company

951 781-2345

May 14, 2018

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California Public Utilities Commission  
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Respectfully,

Fonda McEnoy  
Name

Program Director  
Title

Operation SAKEHOUSE  
Company



May 14, 2018

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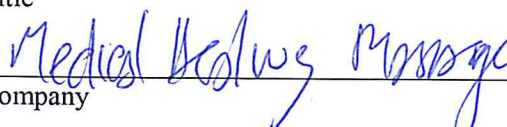
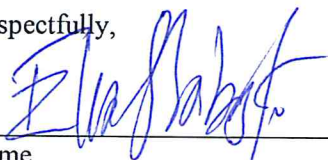
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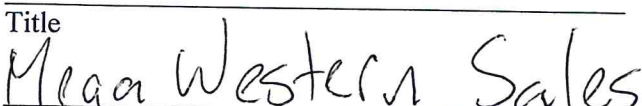
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Respectfully,

  
Name

Title  
  
Company

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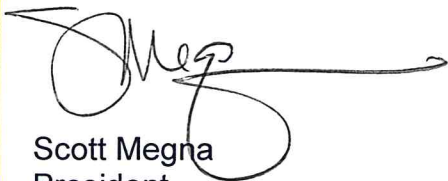
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Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, Raincross Hospitality Corporation respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [smegna@riv-cc.com](mailto:smegna@riv-cc.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Megna', with a long horizontal flourish extending to the right.

Scott Megna  
President  
Raincross Hospitality Corporation

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

I am writing to express my support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. With Riverside serving as the economic driver in one of the fastest growing regions in the country, RTRP provides a viable, long term energy reliability solution to ensure continued prosperity into the future.

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

With recent business expansion in Riverside, including the \$414 million California Air Resources Board emissions testing facility, providing long-term transmission capacity via this proposal will play a pivotal role in attracting and retaining businesses to the region.

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

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

Respectfully,



Name



Title



Company



May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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

Respectfully,

Eugene Mejia

Name

Owner

Title

Eugene Does

Company



Courtyard by Marriott®  
Riverside

1510 University Avenue  
Riverside, CA 92507  
T 951.276.1200 F 951.787.6783  
courtyard.com/ralcyl



On behalf of Courtyard by Marriott Riverside, I **hereby express support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line and a new 230kV electrical substation. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside's 326,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals/trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced during the summer.

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As such, to ensure public safety and protect the economic future of Riverside, Courtyard by Marriott Riverside respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at gm@courtyardriverside or 951-276-1200.

Sincerely,

A handwritten signature in black ink, appearing to read "Maritza Mejia", written over a horizontal line.

Maritza Mejia  
General Manager

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

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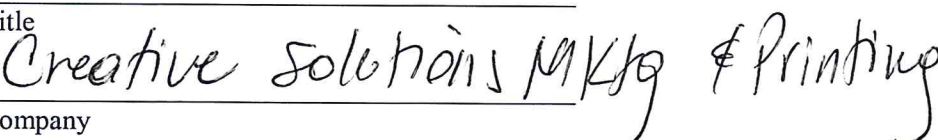
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For these reasons, I respectfully request your full support and approval of the RTRP Hybrid Proposal. Thank you for your consideration.

Respectfully,

  
Name

Owner

Title  
  
Company



May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

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

Respectfully,

Ara Sofia Miramontes

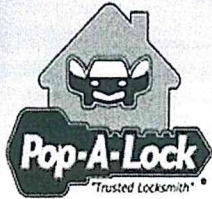
Name

Vice President

Title

Bank of America

Company



**Metasys Corporation**  
dba  
**Pop-A-Lock of Riverside County**  
231 Alessandro Blvd A-482  
Riverside, CA 92508  
Office: 951 992 1096

To Whom It May Concern:

On behalf of Pop-A-Lock of Riverside, I hereby express support for the **Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line and a new 230kV electrical substation. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

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As such, to ensure public safety and protect the economic future of Riverside, Pop-A-Lock respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [teri@cnetpro.com](mailto:teri@cnetpro.com) or 562 458 8664.

Sincerely,

Teri Nardo



May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

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

Respectfully,

James Needham  
Name  
CEO  
Title  
Affordable Technology inc  
Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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

Respectfully,

Robin Nordstrom  
Name

Member  
Title

Nordstrom Bookkeeping  
Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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

Respectfully,



Name

EXECUTIVE DIRECTOR

Title

OLIVE CREST

Company



May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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

Respectfully,

Tina Olson  
Name

Owner  
Title

Tina Olson ChFC  
Company



May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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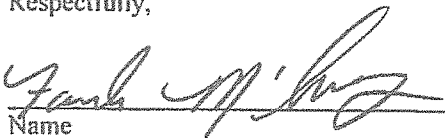
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Respectfully,

  
Name

  
Title

  
Company

May 14, 2018

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California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,



Name

Plant Manager

Title

OSI Group

Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,

Mel Palmer  
Name

CEO  
Title

POWER CHANGE  
Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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

Respectfully,

JOHN PEERSEN

Name

AGENT

Title

DFI INSURANCE

Company



May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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

Respectfully,

Jackie Phillips

Name

Phillips Wellness

Title

Owner

Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,

Darron Pinkney  
Name

Dir. of Community Engagement  
Title

UCR Athletics  
Company

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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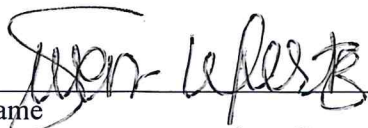
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Respectfully,

  
Name

  
Title

  
Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

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

Respectfully,

Bob Restifo

Name

Manager

Title

AI Computer Consulting

Company



May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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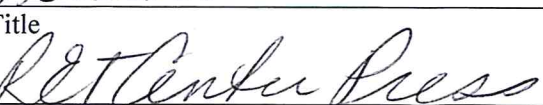
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Respectfully,

  
Name

  
Title

  
Company

May 14, 2018

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California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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\_\_\_\_\_

Name

  
\_\_\_\_\_

Title

  
\_\_\_\_\_

Company

May 10, 2018

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California Public Utilities Commission  
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San Francisco, CA 94103

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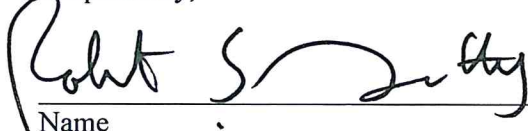
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Respectfully,

  
Name

Resident of Riverside  
Title

ROBERT BEATTY  
Company



May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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Respectfully,

WENDY ROSS

Name

EDUCATIONAL CONSULTANT

Title

TEACHER STRENGTH

Company



May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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Respectfully,

Adolfo Saldana      ADOLFO SALDANA  
Name

Agent, Owner  
Title

State Farm Insurance Co. Adolfo Saldana Insurance Agency  
Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,

Carole Slagle  
Name

Business Development Mgr  
Title

A B Personnel Services  
Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,

Frank Staudenmaier

Name

LABOR Agent

Title

LABORERS LOCAL 1184

Company





On behalf of Provident Bank Mortgage, I hereby express support for the **Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line and a new 230kV electrical substation. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside's 326,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals/trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, Provident Bank Mortgage respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [dsteale@myprovident.com](mailto:dsteale@myprovident.com) and/or 951-675-1982.

Sincerely,

A handwritten signature in black ink, appearing to read "Derek Steele".

Derek Steele  
Residential Mortgage Loan Originator  
NMLS #347904



Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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Respectfully,

DAN STENZ

Name

DAN STENZ - G.M.

Title

MARriott RIVERSIDE

Company



*SPECIALIZING IN BONDS FOR CONTRACTORS*

May 3, 2018

To whom It May Concern:

On behalf of Stong Insurance Services, Inc., I hereby express support for the **Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line and a new 230kV electrical substation. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

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As such, to ensure public safety and protect the economic future of Riverside, Stong Insurance Services, Inc. respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at the address/phone number below or my email address [mike@stongsurety.com](mailto:mike@stongsurety.com).

Sincerely,

  
Michael D. Stong  
President

Stong Surety Insurance Services  
4850 Arlington Avenue Suite B  
Riverside CA 92504

**NASBP**  
Member

Phone (951) 343-0382  
Fax (951) 343-1219  
[www.stongsurety.com](http://www.stongsurety.com)

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,

Wendy Strack  
Name

CEO  
Title

Wendy J Strack Consulting LLC  
Company

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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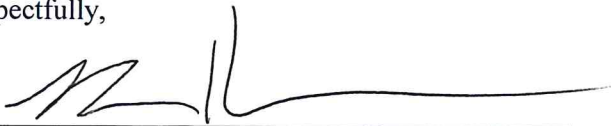
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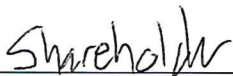
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Respectfully,



Name



Title



Company



May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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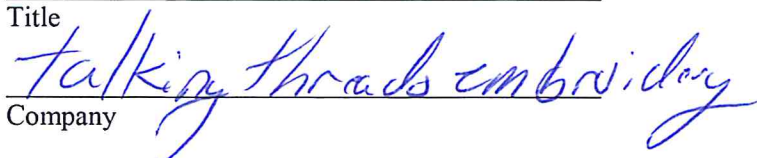
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Title

  
Company

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California Public Utilities Commission  
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Respectfully,

Kevin Tetley  
Name

Financial Advisor  
Title

Tetley Wealth Group  
Company

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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Respectfully,



Name

CEO

Title

The Leonard Financial Group, LLC

Company

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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Respectfully,

Micah Tokuda  
Name

Financial Advisor  
Title

Edward Jones  
Company



May 14, 2018

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California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

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

Respectfully,

Matt Trujillo  
Name

Manager of Business Development  
Title

CARE Ambulance  
Company

May 14, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

I am writing to express my support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. With Riverside serving as the economic driver in one of the fastest growing regions in the country, RTRP provides a viable, long term energy reliability solution to ensure continued prosperity into the future.

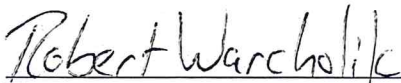
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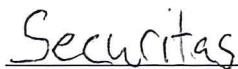
Respectfully,



Name



Title



Company

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

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With recent business expansion in Riverside, including the \$414 million California Air Resources Board emissions testing facility, providing long-term transmission capacity via this proposal will play a pivotal role in attracting and retaining businesses to the region.

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

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

Respectfully,

Sergio Cortez  
Name

Vice President  
Title

NIR Plumbing inc  
Company



On behalf of Galleria at Tyler, I hereby express support for the **Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line, a new 230/69 kV electrical substation, and new 69 kV subtransmission lines. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the five project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

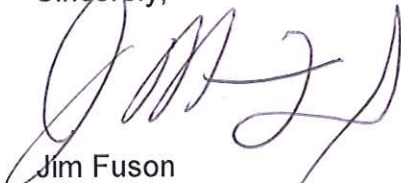
RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside's 330,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals & trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands. RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, Galleria at Tyler respectfully urges the California Public Utilities Commission to approve the RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [james.fuson@ggp.com](mailto:james.fuson@ggp.com).

Sincerely,



Jim Fuson  
Sr. General Manager



May 3, 2018

On behalf of A-Check America, DBA A-Check Global, **I hereby express support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line and a new 230kV electrical substation. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside's 326,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals/trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have. Such a wait could impact the decision of A-Check Global to expand operations in Riverside as this lack of reliability could cause catastrophic losses to our business which relies on 24/7 power to service our international client base. If new locations need to be sought out, it is possible that we would consider leaving Riverside and California all together.

As such, to ensure public safety and protect the economic future of Riverside, A-Check Global respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at via the information provided in the signature line below.

Respectfully,



**Jennifer Humphreys**  
Administrative Manager

**A-Check Global**

+1 951-750-1412

[jhumphreys@acheckglobal.com](mailto:jhumphreys@acheckglobal.com)

[www.acheckglobal.com](http://www.acheckglobal.com)



Powering Strong Communities

May 17, 2018

2451 Crystal Drive  
Suite 1000  
Arlington, VA 22202-4804  
202-467-2900  
[www.PublicPower.org](http://www.PublicPower.org)

Mr. 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](mailto:riversidetrp@panoramaenv.com)

Mr. Uchida:

On behalf of American Public Power Association, I express support for the **Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line, a new 230/69 kV electric substation, and new 69 kV sub-transmission lines. The Draft Subsequent EIR examined the RTRP Hybrid Proposal, along with four other alternatives. Among the five project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option.

The RTRP is a critical infrastructure need for the Riverside region. The addition of a second electrical connection to the transmission grid supports the public safety and economic viability of Riverside's 330,000 residents. The loss or interruption of Riverside's sole connection to the grid could cause a blackout, and would adversely impact hospitals & trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands of residents of California.

The RTRP will also provide Riverside with adequate long-term transmission capacity to serve existing and projected electrical demand while improving overall system reliability. Riverside's current single connection to the transmission grid is inadequate to serve the increased demand experienced during the summer, and is unacceptable in today's reliability focused climate.

Riverside is the most populous city in California that lacks a second connection to the transmission grid. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best-case scenario, if all approvals are obtained, the transmission line will be built and energized in 2023.

As such, to ensure public safety and protect the economic future of Riverside, APPA respectfully urges the California Public Utilities Commission to approve the RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Hyland".

Michael J. Hyland, P.E.  
Senior Vice President – Engineering Services  
American Public Power Association



Lisa Kolieb

Akerman LLP  
601 West Fifth Street  
Suite 300  
Los Angeles, CA 90071

D: 213 533 5947  
T: 213 688 9500  
F: 213 627 6342  
DirF: 213 599 2666  
lisa.kolieb@akerman.com

May 17, 2018

**VIA E-MAIL (riversidetrp@panoramaenv.com) and Priority Mail**

Jensen Uchida  
CPUC Project Manager  
Riverside Transmission Reliability Project  
c/o Panorama Environmental, Inc.  
717 Market Street, Suite 650  
San Francisco, CA 94103

**Re: Comments on Draft Subsequent Environmental Impact Report - Riverside  
Transmission Reliability Project**

Dear Mr. Uchida:

We represent Lesso Mall Development (Jurupa Valley) Limited ("Lesso"), the owner of the Thoroughbred Farms property at 12071 Bellegrave Avenue, Mira Loma, CA 91752 ("Thoroughbred Farms" or "TF"). We have reviewed the Draft Subsequent Environmental Impact Report ("Draft SEIR"), State Clearinghouse No. 2007011113, dated April 2018, for the Riverside Transmission Reliability Project (A.15-04-013) ("Project" or "RTRP"). The RTRP surrounds the Thoroughbred Farms on two sides – both on the west and on the north, as the TF property serves as a turning point for the RTRP at Landon Drive, and accordingly the TF property will be significantly impacted by the Project as currently proposed.

We have reviewed the comment letter prepared by Richards Watson & Gershon, submitted on behalf of the City of Jurupa Valley, dated May 17, 2018 ("Jurupa Valley Comment Letter") and fully support and agree with their comments. As such, please consider the Jurupa Valley Comment Letter incorporated herein by reference. Based upon the comments noted in the Jurupa Valley Comment Letter and the comments set forth below, we believe that the Draft SEIR 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 (14 Cal. Code Regs §§15000 et seq.). Accordingly, as also requested by the City of Jurupa Valley, Lesso requests that the CPUC suspend any further consideration of the Project until a Draft SEIR that fully discloses and analyzes the potential impacts of the Project and fully considers feasible alternatives to the Project has been prepared and recirculated for public review and comment. As noted above, Lesso supports the arguments and conclusions stated in the Jurupa Valley Comment Letter, and as such will not restate them here as they are incorporated by reference.



Instead, this comment letter will focus on the inadequacy of the Draft SEIR as it relates to impacts on the TF property.

**I. THE DRAFT SEIR FAILS TO ADEQUATELY ANALYZE THE PROJECT'S ENVIRONMENTAL IMPACTS ON THE TF PROPERTY**

The Draft SEIR fails to adequately analyze the Project's environmental impacts. This is particularly the case as it relates to the Project's impacts on the TF property. As currently proposed, the Project includes approximately 8 miles of new overhead 230-kV transmission line and approximately 2 miles of new underground transmission line. We understand that as a result of public comment and opposition, the Project was revised by SCE to relocate a portion of the 230-kV transmission line and to change the design of a segment of the transmission line from overhead to underground. However, despite the revision to the Project to underground a portion of the line to reduce significant environmental impacts, the Draft SEIR fails to adequately analyze the impacts on properties adjacent to the overhead lines still proposed as part of the revised Project.

**II. THE DRAFT SEIR DOES NOT ADEQUATELY ADDRESS THE AESTHETIC IMPACTS OF THE PROJECT ON THE TF PROPERTY.**

Although the Project would have significant impacts on the TF property in many areas, the most significant would be aesthetics. As discussed in the Jurupa Valley Comment Letter, the Draft SEIR does not include representative Key Observation Points ("KOP") and thereby misstates the lack of impacts on the TF site. The Project surrounds the TF site on two sides – both on the west and on the north, as the TF property serves as a turning point for the Project at Landon Drive. As currently configured, the Project proposes unsightly overhead transmission lines directly adjacent to the TF property. These overhead transmission lines would impact scenic vistas and visual characteristics and degrade views. However, despite this, the SEIR does not even analyze the TF site as a key observation point to study how it would be impacted, even though the two closest observation point locations would have moderate and high visual impacts. (Draft SEIR, p. 4.1-24)

The KOPs chosen are not representative of views that people would have from the adjacent sites and artificially minimize the Project's features. In fact, despite the fact that the RTRP surrounds the TF property on two sides, none of the KOP locations included in the Draft SEIR show true views from the TF site. Accordingly, the aesthetic impacts of overhead lines adjacent to the TF site have not been adequately studied.

**III. THE DRAFT SEIR INCORRECTLY CONCLUDES THAT THERE IS NO FEASIBLE MITIGATION TO REDUCE THE SIGNIFICANT AESTHETIC IMPACTS.**

As stated in the Jurupa Valley Comment Letter, the Draft SEIR incorrectly concludes that there is no feasible mitigation to reduce the significant aesthetic impacts. This conclusion is specifically contradicted in the Draft SEIR's own findings where it states that undergrounding is not only a feasible mitigation to reduce significant aesthetic impacts, but that it is the environmentally superior alternative. (Draft SEIR, pages ES-12, ES-13, ES-20, 3-8, 6-18.) In fact, the Draft SEIR fully analyzes four alternatives, two of which fully underground alternative route segments, and two of which partially underground alternative segments along the route proposed in the previous DEIR. All four of the alternatives would "avoid significant aesthetic impacts" which exist under the current Project proposal. (Draft SEIR, pages ES-13 and



ES-14.) Moreover, the Draft SEIR specifically identifies "Alternative 1: Bellegrave – Pats Ranch Road Underground" as the "Environmentally Superior Alternative." (Draft SEIR, page ES-20.) In fact, the Draft SEIR concludes that all of the alternatives fully studied were environmentally superior to the proposed Project. (Draft SEIR, page 6-2).

**IV. THE DRAFT SEIR FAILS TO ADEQUATELY ANALYZE FEASIBLE ALTERNATIVES**

As discussed in the Jurupa Valley Comment Letter, the Draft SEIR fails to adequately analyze undergrounding transmission lines for the entire Project as an alternative and does not adequately eliminate such alternative. As noted in the Draft SEIR, undergrounding the entire project (Alternative 8) would avoid the Project's long-term significant aesthetic impacts by removing all of the overhead transmission lines. Moreover, by conceding that Alternative 1 (which would underground the section of the Project adjacent to the TF property) is the Environmentally Superior Alternative and that some of the Project can and should be undergrounded, the draft SEIR demonstrates that undergrounding is feasible. The CEQA Guidelines Section 15364 defines feasibility as "...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Further, the CEQA Guidelines require consideration of alternatives that could eliminate or reduce significant environmental effects even if they "would be more costly." (CEQA Guidelines Section 15126.6(b)). Accordingly, undergrounding the entire Project should be further studied and selected, or at a minimum undergrounding a more significant portion of the Project (such as proposed under Alternatives 1 and 2), especially those sections of the Project adjacent to the TF site, should be selected. As noted above, all of the alternatives fully studied in the Draft SEIR are considered to be environmentally superior to the proposed Project. (Draft SEIR, page 6-2). Accordingly, the proposed Project should be eliminated from consideration.

**V. THE PROJECT WOULD SIGNIFICANTLY IMPACT THE VALUE OF AND ABILITY TO DEVELOP THE TF PROPERTY.**

Although currently vacant, the TF site was entitled in 2012 for a master-planned business community (the "Thoroughbred Farm Specific Plan Project"). The Land Use section of the Draft SEIR fails to recognize or analyze the consistency with or impacts of the Project on the approved Thoroughbred Farm Specific Plan Project. Should the current iteration of the RTRP move forward and above ground lines be installed surrounding the TF property, it will dramatically reduce the ability to develop the site.

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Based upon the above, as well as the comments in the Jurupa Valley Comment Letter, additional environmental analysis must be performed and an updated Draft SEIR must be recirculated for public review and comment. Accordingly, we request that no further action be taken on the Project until the necessary supplemental environmental review has been completed and reviewed by the public.

Sincerely,



Lisa Kolieb  
Partner

cc: City of Jurupa Valley c/o Stephen D. Lee, Richards Watson & Gershon  
Lesso Mall Development (Jurupa Valley) Limited



**BABCOCK Laboratories, Inc.**  
*The Standard of Excellence for Over 100 Years*

May 3, 2018

Mr. George Hanson  
Assistant General Manager  
City of Riverside, Public Utilities

Dear Mr. Hanson,

Babcock Laboratories, Inc. is an environmental and food testing lab located in the City of Riverside. Uninterrupted power is vital to the ability of Babcock Labs to serve our clients including municipalities, water districts, and industry. The incubators and instrumentation we operate must run 24 hours a day, 7 days a week, to provide the daily analytical data that enables us to protect the public health and the environment.

On behalf of Babcock Laboratories, Inc., **I hereby express support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line and a new 230kV electrical substation. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside's 326,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals/trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, Babcock Laboratories, Inc. respectfully urges the California Public Utilities Commission to approve RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at 951-653-3351 or [amackenzie@babcocklabs.com](mailto:amackenzie@babcocklabs.com).

Sincerely,



Allison Mackenzie  
President & CEO

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Dear Mr. Uchida,

I am writing to express my support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. With Riverside serving as the economic driver in one of the fastest growing regions in the country, RTRP provides a viable, long term energy reliability solution to ensure continued prosperity into the future.

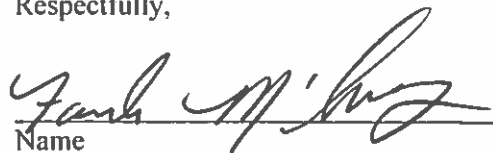
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With recent business expansion in Riverside, including the \$414 million California Air Resources Board emissions testing facility, providing long-term transmission capacity via this proposal will play a pivotal role in attracting and retaining businesses to the region.

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

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

Respectfully,

  
Name

  
Title

  
Company





*Greg Newton, Chairperson*  
*Robert Stockton, Vice Chairperson*  
*Tom Haughey, Secretary*  
*Betty Anderson, Director*  
*Terry Catlin, Director*  
*Jim W. Bowman, Director*  
*Jasmin Hall, Director*  
*J. Arnold Rodriguez, Director*

2151 S. Haven Avenue, Suite 202 • Ontario, CA 91761 • (909) 218-3230 *Curtis D. Paxton, General Manager/CEO*

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May 17, 2018

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

RE: Comments to the Subsequent Environmental Impact Report dated April 2018 for the Southern California Edison's Riverside Transmission Reliability Project

Dear Sir/Madam:

The purpose of this letter is to provide comments to the Draft Subsequent Environmental Impact Report (SEIR) dated April 2018 prepared by the California Public Utilities Commission (CPUC) for the Southern California Edison's Riverside Transmission Reliability Project. The Chino Basin Desalter Authority (CDA) intends to construct a pipeline, portions of which are within similar alignment corridors as the Riverside Transmission Reliability Project within the City of Jurupa Valley. Given the proximity and similar construction schedules of our respective projects, the CDA requests mutual cooperative engagement with Southern California Edison, the City of Riverside, and the CPUC as both projects proceed through design and construction, for our agencies mutual benefit.

The CDA is a Joint Exercise of Powers Agency, formed between eight public agencies including Jurupa Community Services District, the Santa Ana River Water Company, the Cities of Chino, Chino Hills, Norco and Ontario, Western Municipal Water District, and the Inland Empire Utilities Agency. The CDA purifies groundwater extracted from the lower Chino Basin and distributes the drinking water to its member agencies.

One of CDA's major facilities is its Chino II Desalter located in the City of Jurupa Valley. This treatment plant produces drinking water that is delivered to several of its members agencies, including Jurupa Community Services District who, in turn, delivers the water to its customers in the Cities of Eastvale and Jurupa Valley. CDA can produce up to 20.5 million gallons per day (MGD) from the Chino II Desalter, approximately half of its total supply capability. As a local water supply source, continued safe operation of the Chino II Desalter is vital to the local community's drinking water supply reliability.

CDA has begun final design of a groundwater cleanup project called the South Archibald Plume (SAP) project which, when completed, will deliver groundwater with elevated trichloroethylene (TCE) levels to

May 17, 2018

the Chino II Desalter for treatment. The project is being implemented under a Stipulated Settlement and Cleanup and Abatement Order No. R8-2016-0016, issued by the California Regional Water Quality Control Board, Santa Ana Region, on September 23, 2016. The project includes construction of a well and approximately 15,000 lineal feet of 24-inch pipeline and 1,000 feet of 12-inch pipeline. The attached exhibit shows the proposed pipeline alignment in blue. CDA's pipeline design is expected to be completed October 2018, with construction beginning January 2019 and completed October 2019.

From review of the CPUC's SEIR, it appears several of CDA's proposed pipeline segments are within alignment corridors that parallel or are in proximity to the SCE Riverside Transmission Reliability Project. Most notably, CDA's pipe segments located within Wineville Avenue, between Bellegrave Avenue and Cantu Galleano Ranch Road, and Bellegrave Avenue, from the I-15 Freeway to Wineville Avenue. CDA proposes to construct a 24-inch pressure pipeline within these street rights-of-way.

CDA appreciates the opportunity to comment on the SEIR and looks forward to close cooperation between our respective projects. Please do not hesitate to contact me at (949) 557-8550 or [cmiller@hazenandsawyer.com](mailto:cmiller@hazenandsawyer.com).

Sincerely,



Cindy L. Miller, P.E.  
Program Manager, South Archibald Plume Project  
Chino Basin Desalter Authority

Enclosure: Pipeline Alignment Exhibit

Cc: Curtis D. Paxton, General Manager/CEO, CDA  
Shaun Stone, Inland Empire Utilities Agency  
Jesse Pompa, Inland Empire Utilities Agency  
Steve Loriso, City of Jurupa Valley









915 L Street., Suite 1460  
Sacramento, CA 95814  
(916) 326-5800  
CMUA.org

May 17, 2018

Mr. 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](mailto:riversidetrp@panoramaenv.com)

RE: Support for the Riverside Transmission Reliability Project Hybrid Proposal

Mr. Uchida:

On behalf of the California Municipal Utilities Association (CMUA), **I hereby express support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the “Revised Project” in the Draft Subsequent EIR). CMUA represents the 43 publicly owned electric agencies across California, including Riverside Public Utilities. We support efforts to provide reliable, affordable and sustainable power supply to consumers across the state.

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line, a new 230/69 kV electrical substation, and new 69 kV subtransmission lines. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the five project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside’s 330,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (i.e., a blackout) would adversely impact hospitals & trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside’s sole connection is inadequate to serve the increased demand experienced during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have.



As such, to ensure public safety and protect the economic future of Riverside, APPA respectfully urges the California Public Utilities Commission to approve the RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Barry Moline". The signature is written in a cursive, flowing style.

Barry Moline  
Executive Director



May 14, 2018

Mr. Jensen Uchida California Public Utilities Commission 717 Market Street, Suite 650 San Francisco, CA 94103

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

Dear Mr. Uchida,

I am writing to express my support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal, which will bolster Riverside's energy reliability and infrastructure for thousands of businesses and residents. With Riverside serving as the economic driver in one of fastest growing regions in the country, RTRP provides a viable, long term energy reliability solution to ensure continued prosperity into the future.

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

With recent business expansion in Riverside, including the \$414 million California Air Resources Board emissions testing facility, providing long-term transmission capacity via this proposal will play a pivotal role in attracting and retaining businesses to the region.

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

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

Respectfully,

Glenn Scobie Name  
President Title  
AB Personnel Services Company

P.O. Box 1033, Riverside CA 92502  
Phone: (760) 955-6966 Fax: (760) 955-6775

May 10, 2018

Mr. Jensen Uchida  
California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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

Respectfully,

Wendy Strack  
Name

CEO  
Title

Wendy J Strack Consulting LLC  
Company

May 10, 2018

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California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

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Respectfully,

Micah Tokuda  
Name

Financial Advisor  
Title

Edward Jones  
Company





Riverside Medical Center Area

May 17, 2018

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

Dear Sir (Ma'am),

On behalf of Kaiser Permanente, Riverside, I **hereby express support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line, a new 230/69 kV electrical substation, and new 69 kV subtransmission lines. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the five project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside, and therefore the Kaiser Permanente facilities located in the City of Riverside. The lack of a second connection puts Riverside's 330,000 residents, our thriving business community, and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals and trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands of Inland Empire residents.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside's sole connection is inadequate to serve the increased demand experienced by the city during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best-case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinarily long time to wait for a basic protection that all of Riverside's neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, Kaiser Permanente, Riverside respectfully urges the California Public Utilities Commission to approve the RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me at [George.R.Velasco@kp.org](mailto:George.R.Velasco@kp.org) and/or (951)353-3881.

Sincerely,

A handwritten signature in black ink that reads "George R. Velasco".

George R. Velasco  
Assistant Hospital Administrator  
Riverside Medical Center Area

# Southern California Public Power Authority

1160 Nicole Court • Glendora, CA 91740 • 626.793.9364

May 17, 2018

Mr. 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

Mr. Uchida:

On behalf of Southern California Public Power Authority, **I hereby express support for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the “Revised Project” in the Draft Subsequent EIR).

The RTRP Hybrid Proposal would include the construction of a new double-circuit 230-kilovolt (kV) transmission line, a new 230/69 kV electrical substation, and new 69 kV subtransmission lines. The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the five project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and our region.

RTRP is a critical infrastructure need for Riverside. The lack of a second connection puts Riverside’s 330,000 residents and the surrounding region in considerable public safety and economic danger. The loss or interruption of our sole connection to the grid (blackout) would adversely impact hospitals & trauma centers, jails, shelters, fire stations, traffic signals, schools, and businesses that serve the region and employ thousands.

RTRP will also provide Riverside with adequate transmission capacity to serve existing and projected electrical demand (load), long-term system capacity for load growth, and system reliability. Riverside’s sole connection is inadequate to serve the increased demand experienced during the summer.

Riverside is the most populous city in California that lacks a second connection. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. In the best case scenario, if all approvals are obtained, the line will be built and energized in 2023. Seventeen years is an extraordinary long time to wait for a basic protection that all of our neighbors already have.

As such, to ensure public safety and protect the economic future of Riverside, SCPPA respectfully urges the California Public Utilities Commission to approve the RTRP Hybrid Proposal without further delay.

Thank you for your consideration. If you have any questions please feel free to contact me.

Sincerely,

Michael Webster  
Executive Director

May 17, 2018

California Public Utilities Commission  
717 Market Street, Suite 650  
San Francisco, CA 94103

Dear Commissioners,

On behalf of the University of California, Riverside (UCR), I am writing to express our support **for the Riverside Transmission Reliability Project (RTRP) Hybrid Proposal** (referred to as the "Revised Project" in the Draft Subsequent EIR).

900 University Avenue  
Riverside, CA 92521  
Tel 951.827.5201  
Fax 951.827.3866  
[www.ucr.edu](http://www.ucr.edu)

RTRP is a critical infrastructure need for the university. UCR is not only the largest employer in the city with almost 9,000 employees, but the largest electric user as well.

The current lack of a second connection from the electric grid to the city of Riverside is of significant concern to us. We conduct approximately \$150 million annually in extremely sensitive research, and any power interruption potentially puts our research projects in jeopardy.

Riverside is the most populous city in California that lacks a second connection to the grid. In 2006, the California Independent System Operator ordered Southern California Edison to create a second connection for Riverside to ensure the same reliability as other cities. This is a need that has remained unmet for far too long. Further, Riverside's sole connection is inadequate to serve the current demand experienced during peak summer hours.

The Draft Subsequent EIR examined the RTRP Hybrid Proposal and four other alternatives. Among the project possibilities, the RTRP Hybrid Proposal is the most cost-effective and least-intrusive option to serve the needs of Riverside and UCR. RTRP will also provide Riverside with adequate capacity to serve not only existing electrical demand, but long-term system capacity for load growth, and system reliability.

As such, to ensure public safety and protect the economic future of Riverside, UCR requests the California Public Utilities Commission to approve RTRP Hybrid Proposal.

Thank you for your consideration.

Sincerely,



Kim A. Wilcox  
Chancellor