

Southern California Edison
RTRP A.15-04-013

DATA REQUEST SET A1504013 ED-SCE-12

To: ENERGY DIVISION
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Title: Project Manager
Dated: 08/20/2018

Question 01:

We've received several comments related to the Land and Water Conservation Fund land conversion that is occurring within the Hidden Valley Wildlife Preserve. Can you, or someone involved in the process, provide an update on the status of the land conversion, including NEPA review? Please also indicate a schedule for the NEPA decision, if known.

Response to Question 01:

Riverside Public Utilities (RPU) and Southern California Edison (SCE) have proposed to construct the Riverside Transmission Reliability Project (RTRP), which will consist of both 69 kV and 230 kV electrical facilities, some of which would be located within and crossing over lands within the Hidden Valley Wildlife Area (HVWA). Because the affected HVWA lands were federally funded, in part, under Section 6(f)(3) of the Land and Water Conservation Fund Act (LWCF), conversion of these lands to non-recreation uses (*e.g.* electrical transmission line utility infrastructure) and the acquisition of "replacement" lands to offset these LWCF conversion impacts requires review and approval by the National Park Service (NPS). The LWCF State Assistance Program Manual (*available here* : https://www.nps.gov/subjects/lwcf/upload/lwcf_manual.pdf) and the NPS require the submittal of a Project Description-Environmental Screening Form (PD-ESF) by the sponsoring agency (which is the Riverside County Regional Open Space District (District)), as well as appropriate National Environmental Policy Act (NEPA) environmental review. As sponsoring agency, the District has been consulting with the California Department of Fish and Wildlife-Wildlife Conservation Board (CDFW) because land within the District managed HVWA is *also* owned by CDFW. The California Department of Park and Recreation - Office of Grants and Locals Services (OGALS) which administers LWCF program within California, participated in the identification of replacement lands, and serves as liaison to the NPS for processing of the PD-ESF, as is described by the LWCF State Assistance Program Manual.

As stated in the PD-ESF and the LWCF State Assistance Program Manual, the LWCF conversion proposal environmental review properly focuses on the impacts from the loss of public outdoor recreation parkland and the replacement parkland proposed for same, and *not* the action precipitating the conversion or benefits thereof (in this case, the construction of an overhead electrical transmission line) beyond the boundary of the Section 6(f) boundary. The environmental review must 1) focus on "resource impacts" as indicated on the PD-ESF, and 2) the impacts of creating new replacement parkland and replacement recreation opportunities. The NPS ultimately approves or denies the conversion and replacement of LWCF lands after the Sponsoring Agency completes and submits the PD-ESF and NEPA related documentation that analyzes the effects of recreation land loss and replacement.

With respect to the land conversion currently being undertaken, SCE understands that POWER Engineers, Inc., on behalf of the District, has submitted two versions of the draft PD-ESF to OGALS for

review: on or about December 11, 2017 and on or about June 6, 2018. The PD-ESF details the proposed LWCF conversion and the replacement property's current conditions and potential impacts of the Section 6(f) land conversion. The PD-ESF has been reviewed by OGALS and approved for submission to the State. The PD-ESF is currently undergoing final review by CDFW.

Once CDFW approves the contents of the PD-ESF, the District intends to provide an opportunity to review and receive comments on the PD-ESF from the Riverside County Attorney, the Riverside Park District Advisory Commission, and the Riverside County Board of Supervisors. Following this final review, the District would submit the application (PD-ESF and supporting materials) to OGALS and NPS. The NPS would then review the draft PD-ESF for deficiencies and make a determination on the level of NEPA analysis (anticipated to be an Environmental Assessment (EA)) required for making a decision on the proposed Section 6(f) conversion and replacement lands. The NEPA analysis document would then be completed and attached to the final PD-ESF. Appropriate public review would be conducted by the NPS, and the NPS would then issue their decision (anticipated to be a Finding of No Significant Impact (FONSI)).

SCE currently anticipates the PD-ESF to be submitted to OGALS and NPS in or around November/December 2018. It is estimated that the NEPA analysis, review by the NPS, and public review will take approximately 9-12 months from the time of submittal of the final PD-ESF and EA to the NPS.