



March 28, 2019

California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: RIVERSIDE TRANSMISSION RELIABILITY PROJECT**

The Jurupa Area Recreation and Park District (JARPD or the District), has formally opposed the Riverside Transmission Reliability Project (Project or RTRP) on numerous occasions, as previously set forth in its February 8, 2017 correspondence to this Honorable Commission. The District has determined that this project, as proposed, will have significant adverse impacts, both environmental and financial, on the Jurupa Area Recreation and Park District, which provides Park and Recreation Services to more than 114,000 residents of Zip Codes 92509 and 91752, and its constituents who use its parks.

The purpose of this letter is to communicate the great concern that pervades the community over this Project and to urge the Public utilities Commission to require that the Project, if approved, be placed under ground in all locations that traverse or are adjacent to the jurisdiction of the District.

As described in the attached Resolution, which was adopted unanimously by the District's Board of Directors, the District operates certain Community Facilities Districts to finance its park maintenance programs and some of its park financing programs. One of the CFDs (CFD No. 2004-1) is directly in the path of the Project, and would be substantially impacted if the Project is located above ground as proposed. This CFD was designed prior to the RTRP conception and repayment of the debt was based on buildout of the CFD. If the RTRP is allowed to continue as proposed, it will reduce the ability of the District to repay the debt to Riverside County by an estimated \$1.0 million. 6 other CFDs would be affected by the project as well.

The present value of the amount of one-time impact fees that would be lost is approximately \$394,000.00. This amount increases each year by the greater of CPI or 4%. Even more significant is the fact that the ongoing maintenance revenues which could be raised by the District to serve these areas would decrease by approximately \$8.855 Million Dollars (This amount is calculated over the next fifty years, even though the loss would be *in perpetuity*). These losses are irrevocable if the Project is placed above ground as proposed.

The RTRP, as proposed, will significantly impact the Jurupa Area Recreation and Park District and its ability to provide quality well maintained park and recreation facilities within the Jurupa Valley. The loss of maintenance funds, compounded annually, will ultimately impact the District's ability

**Board Of Directors**

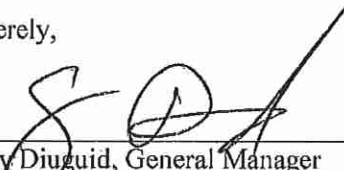
Ronald Anderson • Stephen Anderson • Josie Gaytan • Kim Jarrell Johnson • Ross Leja  
8621 Jurupa Road • Jurupa Valley, CA 92509 • (951) 361-2090 • Fax (951) 361-2095  
[www.jarpd.org](http://www.jarpd.org)

**General Manager**  
Colby Diuguid  
**Office Manager**  
Loretta Voges

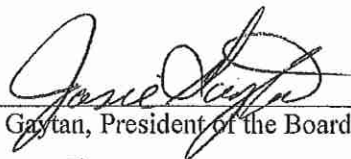
The Board of Directors of JARPD urges the Public Utilities Commission to take into consideration the impact on the Jurupa Area Recreation and Park District and the route of the Riverside Transmission Reliability Project. The Board of Directors encourages the undergrounding of the Project in order to protect the quality of life in the Jurupa Valley.

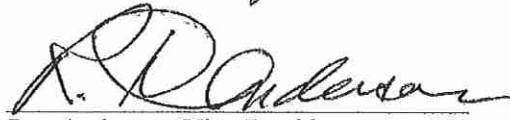
If you have any questions regarding the concerns of the District, please feel free to contact my office.


Sincerely,

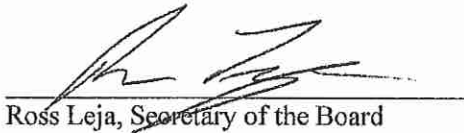
  
\_\_\_\_\_  
Colby Diuguid, General Manager  
Jurupa-area Recreation and Park District

**Board of Directors**

  
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Josie Gaytan, President of the Board

  
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Ron Anderson, Vice-President

  
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Kim Jarrell Johnson, Board Member

  
\_\_\_\_\_  
Ross Leja, Secretary of the Board

  
\_\_\_\_\_  
Stephen Anderson, Board Member

Attachment: JARPD Board of Directors Resolution No. 2019-09 dated March 28, 2019

XC: Board of Directors - JARPD  
City of Jurupa Valley  
City of Eastvale  
Jurupa Unified School District  
California Public Utilities Commission  
Southern California Edison  
City of Riverside

**RESOLUTION 2019-09**

**A RESOLUTION OF THE BOARD OF DIRECTORS OF THE  
JURUPA AREA RECREATION AND PARK DISTRICT IN  
OPPOSITION TO ABOVE GROUND TRANSMISSION LINES  
AND SUPPORTING UNDERGROUNDING OF ALL  
TRANSMISSION LINES WITHIN ITS JURISDICTION IN  
CONNECTION WITH THE RIVERSIDE TRANSMISSION  
RELIABILITY PROJECT**

- WHEREAS:** The Jurupa Area Recreation and Park District (“Park District”) is responsible for the Park and Recreation administration within its jurisdictional boundaries, including properties within Zip Codes 92509 and 91752; **AND**
- WHEREAS:** The Park District currently owns and operates 31 Parks and 4 other Recreation Facilities within its territory; **AND**
- WHEREAS:** The proposed Riverside Transmission Reliability Project (“Project”) is proposed to be constructed on property within the jurisdictional boundaries of the Park District and, as such, the project will impact a portion of the District; **AND**
- WHEREAS:** The Park District previously forwarded its Resolution No. 2017-03 and its letter of February 8, 2017 to the PUC, wherein it voiced its objections to the Project; **AND**
- WHEREAS:** The Park District has developed a method of financing future park improvements and existing and future park maintenance through the establishment of community facilities districts to serve new development within its boundaries, as authorized by California law since 1982; **AND**
- WHEREAS:** The financing method is based, in part, upon the projected future development within the Park District Boundaries as shown on General Plan of the City of Jurupa Valley; **AND**
- WHEREAS:** Development of the project above ground would require the acquisition and/or dedication of a significant amount of real property otherwise planned to be developed with residential commercial and/or retail facilities within the Park District territory; **AND**
- WHEREAS:** Such development has been planned for, and substantial investments have been made, by the Park District in reliance upon the stability of the described financing method and the ability to have “local control” of the

community's future by having a voice in any future General Plan Amendments made by the City of Jurupa valley; **AND**

**WHEREAS:** If the Project is located above ground, and otherwise developable property is incorporated into the Project and no longer available for development, then the future revenues available to the Park District to maintain existing and future Parks would be substantially reduced. The present value of the amount of one-time impact fees that would be lost is approximately \$394,000.00. This amount increases each year by the greater of CPI or 4%. Even more significant is the fact that the ongoing maintenance revenues which could be raised by the District to serve these areas would decrease by approximately \$8.855 Million Dollars (This amount is calculated over the next fifty years, even though the loss would be *in perpetuity*); **AND**

**WHEREAS:** If the Project is undergrounded within the territory of the Park District, the Project's negative financial impact will be substantially mitigated, and the Park District will remain able to provide the planned parks and an acceptable level of maintenance within its parks; **AND**

**WHEREAS:** The Project is proposed along the East Side of the I-15 Freeway. The Project crosses Bellgrave Avenue and heads south to Limonite Ave before going underground and continuing South. The proposed Project bisects a Community Facilities District (CFD) JARPD created for the maintenance of park and recreation facilities along the 1-15 corridor. This CFD is roughly outlined by Wineville Avenue on the East, Bellgrave Ave to the North, Hamner Avenue to the West and 68<sup>TH</sup> St. to the South. Within this area, the District currently operates or is developing seven (7) parks. Vernola Family Park is the largest park within this CFD at 21 acres and was built in 2010 with funds loaned to JARPD from the Riverside County Economic Development Agency (Riverside County). As part of the formation of this CFD and construction of Vernola Family Park, every Equivalent Dwelling Unit (EDU) built within this CFD must pay Development Impact Fees to the District, in turn the District forwards the funds to Riverside County to repay the construction loan. The loan for Vernola Family Park was \$4.5 million. Currently, the District still owes roughly \$1.5 million towards the Vernola Family Park loan; **AND**

**WHEREAS:** As stated in the Final Subsequent Environmental Impact Report, this study (Wertheimer, N. and Leeper, E., 1979) observed a statistical association between the high-current configuration) of electric power lines outside of homes in Denver and the incidence of childhood cancer. The "wire code" was assumed to be related to current flow of the line; **AND**

**WHEREAS:** On behalf of the CPUC, the California Department of Health Services

(DHS) completed a comprehensive review of existing studies related to EMF from power lines and potential health risks. All three of the DHS scientists are inclined to believe that EMFs can cause some degree of increased risk of childhood leukemia, adult brain cancer, Lou Gehrig's Disease, and miscarriage; **AND**

**WHEREAS:** As stated in the Final Subsequent Environmental Impact Report, Hazards and Hazardous Materials Section, potential impacts from hazards such as downed structures exist within the project, as proposed; **AND**

**WHEREAS,** The Project, as stated above, would traverse and/or be adjacent to 7 parks owned and operated by the Park District. Hundreds if not thousands of citizens using these parks, some on a daily basis, would be subjected to the above stated risks, and such risks would not exist, or would at least be mitigated significantly if the Project is undergrounded; **AND**

**WHEREAS:** As stated in the Subsequent Final Environmental Impact Statement, the alternative which undergrounds the lines North of Limonite Ave. in Jurupa Valley is the environmentally superior alternative.

**NOW THEREFORE, BE IT RESOLVED** that the Board of Directors of the Jurupa Area Recreation and Park District hereby states its Opposition to the construction of the Riverside Transmission Reliability Project in total. However, if the Project is going to be built over the objection of the Park District and others located in the Jurupa Valley communities, then the Park District hereby states its preference that the Project be located under ground north of Limonite Ave. wherever it is within the territory of the Park District, which, as stated by the Subsequent Final Environmental Impact Statement, is the environmentally superior option being considered by the PUC.

The foregoing Resolution was approved by the Board of Directors of the Jurupa Area Recreation and Park District at the Board Meeting held on March 28, 2019 at 8621 Jurupa Road, Jurupa Valley, California, on motion made by Director R. Leja and seconded by Director K. Johnson, and carried by the following roll call vote:

R. Anderson aye S. Anderson aye Gaytan aye Johnson aye Leja aye

  
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President, Board of Directors

  
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Secretary, Board of Directors