

City of Jurupa Valley

Verne Lauritzen, Mayor . Micheal Goodland, Mayor Pro Tem .
Brian Berkson, Council Member . Anthony Kelly, Council Member . Laura Roughton, Council
Member

February 8, 2017

Mr. Jensen Uchida (CPUC Project Manager)
California Public Utilities Commission
c/o Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco, CA 94111

Re: Notice of Preparation of a Subsequent Environmental Impact Report (EIR) for the
Riverside Transmission Reliability Project (A.15-04-013)

Mr. Uchida,

The City of Jurupa Valley appreciates the opportunity to provide the attached comments
on the Notice of Preparation for the above referenced project.

The City understands that the CPUC will prepare a Subsequent EIR to evaluate new
potentially significant environmental effects of the revised project that may occur as a
result of changes to the project after certification of the 2013 RTRP EIR. The
Subsequent EIR will also contain mitigation measures to reduce effects determined to
be significant. The Subsequent EIR will contain only the information necessary to
document impacts from changes in the project from the 2013 RTRP EIR. The 2013
RTRP EIR will be used by the CPUC to consider the effects of the unchanged project
elements.

The CPUC also prepared an Initial Study Checklist using preliminary analysis of the
revised project and documents submitted by SCE and other parties to the CPUC's
CPCN proceeding. The purpose of the Initial Study Checklist is to define the scope of
the environmental impact analysis for the CPUC Subsequent EIR.

Attached to this letter are the City's comments with respect to the preparation of the
Subsequent EIR and the Initial Study Checklist. As noted above, the 2013 RTRP EIR
will be used by the CPUC to consider the effects of the unchanged project elements.
The City's comments are intended to apply to the 2013 RTRP as well because
inasmuch as the entire EIR will be circulated for public comment and the Commission
will rely on the document in its entirety.

The City is aware that all written comments for the CPUC's CEQA scoping period must
be received by February 24, 2017. Please note that the comments attached to this letter
may not be the only comments the City makes with respect to the Notice of Preparation
and that additional comments may be forthcoming on or before February 24, 2017.

Mr. Jensen Uchida
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The City also requests that copies of the Draft Subsequent EIR and appendices be provided directly to the City of Jurupa Valley Planning Department, addressed to my attention: Thomas Merrell, AICP, Planning Director.

If you have any questions, please contact me at (951) 332-6464 or by email at tmerrell@jurupavalley.org.

Sincerely,



Thomas G. Merrell, AICP
Planning Director

cc: Gary Thompson, City Manager
George Wentz, Assistant City Manager
Jim Smith, Director of Public Works / City Engineer
Peter Thorson, City Attorney

Encl. City of Jurupa Valley comments with respect to the preparation of the Subsequent EIR and the Initial Study Checklist

City of Jurupa Valley

COMMENTS ON THE NOTICE OF PREPARATION

SUBSEQUENT EIR FOR THE RTRP (A.15-04-013)

FEBRUARY 8, 2017

COMMENTS ON THE SCOPE OF THE EIR PREPARED BY CPUC

AESTHETICS

1. View Simulations. The view simulations in the November 2016 "Aesthetics and Visual Resources Technical Report" prepared by Power Engineers for the RPU and submitted to the CPUC in response to the Deficiency Notice Q3 are not adequate to evaluate the aesthetic impacts of the project. The EIR should disclose these impacts on residential neighborhoods on Wineville and Pats Ranch Road in Jurupa Valley, and on both sides of the Santa Ana River in Jurupa Valley, Riverside and Norco. We will provide a map that identifies the appropriate viewpoints for photorealistic view simulations along the overhead transmission line alignment by February 24, 2017.

RECREATION

2. Recreational Open Space. The cities of Jurupa Valley and Riverside, along with the County of Riverside and non-profit conservation organizations have worked to establish the natural riparian and open space environment along and through the Santa Ana River. This area includes public open space, trails, beaches, forests and stunning natural vistas. The U.S. National Park Service has offered its services to promote and enhance the precious resource as a sanctuary for wildlife and a regional recreational area. The EIR should evaluate the potential degradation of this area as a consequence of the intrusion of 100-foot high transmission towers across and along this recreational resource.

HAZARDS:

3. Safety. The alignment of the overhead transmission line will be in close proximity to homes, recreational facilities such as parks and trails, and other areas where the potential for a tower or line failure could have a serious safety impact. The Subsequent EIR should include an analysis of existing sources for physical hazards including proximity to wildland fire hazards and objects that could induce current and voltage and result in shock hazards. The EIR should disclose such potential impacts and identify mitigation measures.

LAND USE AND PLANNING

4. Jurupa Valley General Plan. The proposed project is not consistent with City of Jurupa Valley General Plan, which contains policies and development requirements that provide for a healthy living and working environment for its citizens. Over 75% of the City's residents are blue collar low and median income minorities. In the early growth years of the City prior to incorporation, industrial land uses were allowed to indiscriminately locate close to residential neighborhoods, many of which were disadvantaged by language or cultural barriers and unable to influence these decisions. The Land Use Element, Housing Element, Open Space Element, Conservation Element and Environmental Justice Element establish a new standard for eliminating and minimizing further impacts of encroaching industrial development. While the RTRP project is viewed as a utility, its inherent characteristics make it an industrial land use as well.

Section 2 of the Environmental Justice Element, titled *Land Use and the Environment*, states:

"This section addresses environmental hazards as well as land use planning to ensure that disadvantaged or minority communities are not adversely impacted by new development where they live work and play. Additionally, policies that address how to improve or retrofit existing hazards are included. In addition to air emissions, commercial and industrial development, and their related trucks, can also generate traffic, noise, odors, light and glare which can adversely affect residential populations."

"Objective EJ-2: A reduction in disproportionate environmental burdens affecting low-income and minority populations."

The Jurupa Valley General Plan identifies the Santa Ana River as an asset and has policies to ensure the preservation and protection of the Santa Ana River. The project crosses and traverses the river, and is not consistent with the General Plan. Some of the policies that are applicable to the project are as follows:

- JURAP 16.1 – Conserve existing wetlands and wetlands functions and values in the Jurupa Area Plan portion of the Santa Ana River, with a focus on conserving existing habitats in the river.
- JURAP 16.2 – Conserve alluvial fan sage scrub associated with the Santa Ana River to support key populations of Santa Ana woolly-star.
- JURUPA 16.3 – Conserve clay soils to support key populations of many-stemmed dudleya, known to occur along the Jurupa Area Plan portion of the Santa Ana River.
- JURUPA 16.4 – Conserve known populations of least Bell's vireo and southwestern willow flycatcher along the Santa Ana River.
- JURAP 16.5 – Provide for and maintain a continuous linkage along the Santa Ana River from the northern boundary of the Area Plan to the western boundary.
- JURAP 16.6 – Conserve large intact habitat blocks consisting of coastal sage scrub, chaparral, and grasslands to support known locations of coastal California gnatcatcher.
- JURAP 7.13 - **Discourage utility lines within the river corridor. If approved, lines shall be placed underground where feasible and shall be located in a manner to harmonize with the natural environmental and amenity of the river.**

The City has a strong equestrian community that utilizes the trails, streets, and parks around Mira Loma, Sky Country, Riverdale, and Santa Ana River. The General Plan identified these equestrian communities in the City and has policies to protect the equestrian character. The project is inconsistent with the General Plan including **JURUPA 3.4: Discourage the encroachment of incompatible land uses into the Policy Area**. The project is inconsistent with the **General Plan's Trails & Bikeway System map**. The Trails & Bikeway System is the City's planned pedestrian, multi-purpose trails, and bikeway map. The City has policies that implement the development of the Trails & Bikeway System so it can accommodate bicyclists, pedestrians, hikers, and equestrian users. These users would be able to travel throughout the City and connect to the larger regional network safely. The trails and bikeway are intended to lead users to recreational open space areas or other points of interest. Based on the Trails & Bikeway System map and the proposed project, the project has potential impact on the trails or bikeway that are located or planned on 68th Street (between I-15 to Holmes Avenue), at the intersection at I-15 and Bellegrave Avenue, and Wineville Avenue (between Bellegrave Avenue to Cantu-Galleano Road).

The project obstructs the equestrian lifestyle and character of these neighborhoods within the City of Jurupa Valley. As an example, the project is proposed within a trail along

Wineville Avenue, which eventually leads to the Santa Ana River. It impacts the trail connection within the City and regional network. The project may create an unsafe path for equestrian and other users of the trail. The project also takes away land that would enhance the equestrian lifestyle. The General Plan has many policies that encourages land along the streets to be developed to enhance the pedestrian and equestrian experiences by providing more pedestrian paths, trails, and landscaping. However, some portion of the project is proposed along the street or corridors. The project is an obstacle to pedestrians, equestrians, and other non-motorized users by disrupting the City's street design, sidewalks, and trail connection.

The CPUC Initial Study Checklist (IS) states on Page 4-21, Paragraph B:

"The underground transmission lines would be located within the same land use zones identified in the 2013 RTRP EIR. The CPUC has the sole authority for siting and design of the project under General Order 131-d. The project is exempt from local land use policies. The project changes would not result in new conflicts with local land use plan, policies or regulations.... No additional analysis of potential conflicts with plans and policies is required.

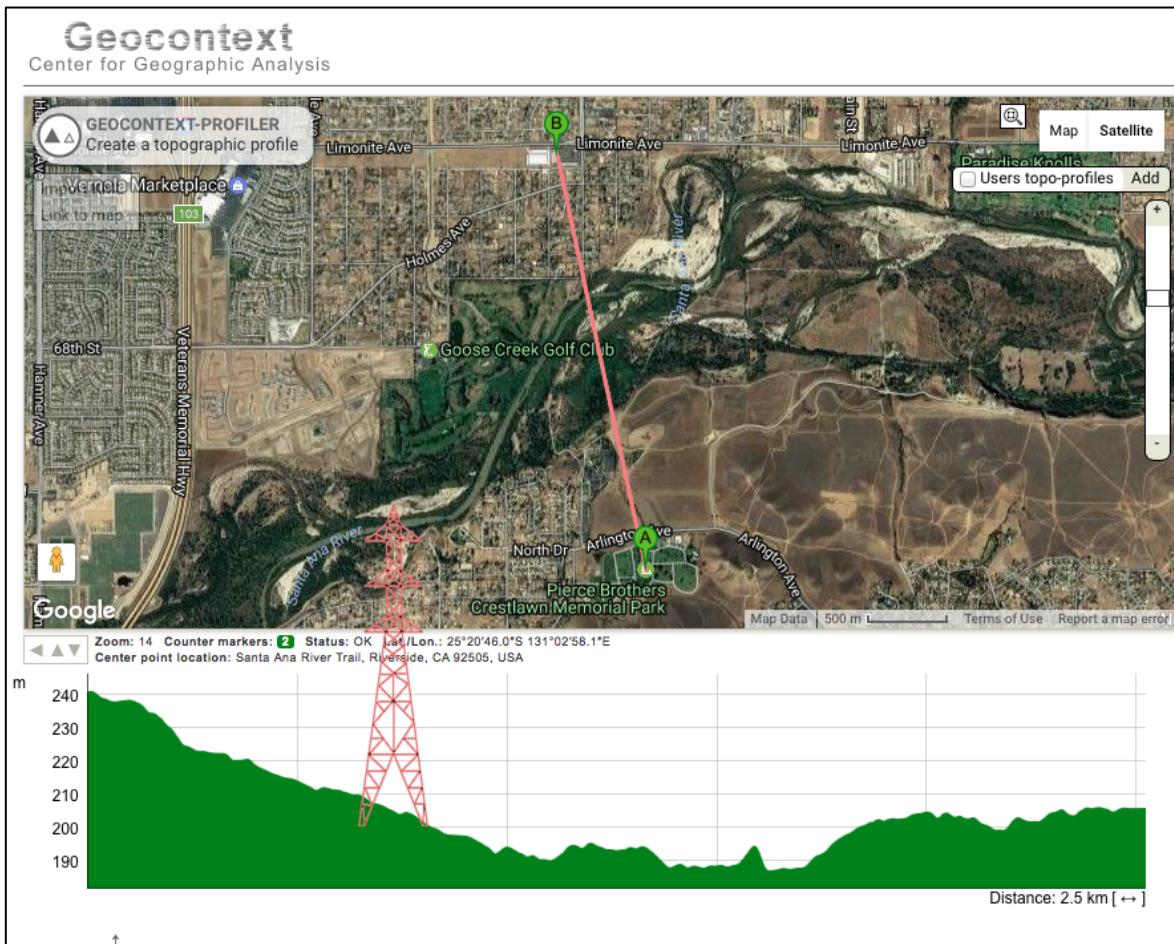
This statement only applies to the undergrounding portion of the transmission line. Figure 2.3-1 of the IS shows a change in location of the above ground transmission line to the west side of Wineville Avenue between Cantu-Galleano Ranch Road and Landon Avenue. As such, the EIR should analyze the impacts of this relocation and the impact on the Jurupa Valley General Plan as this is a revision that was not included in the 2013 RTRP EIR.

The EIR should include an analysis of the project's consistency with the Jurupa Valley General Plan and disclose that the project is not consistent with the Jurupa Valley General Plan.

5. Incompatible Land Use. The growth inducing impacts and resultant environmental harm should be addressed. The project introduces an industrial use into land in Jurupa Valley used for or zoned for residential and commercial. Several hundred acres of adjacent vacant land will not be appropriately developed with residential or commercial as a result of the incompatibility of the power line with such uses. The only reasonable economic value of these lands will be industrial, which, if developed will put existing residential neighborhoods in harm's way from chemical and air pollution and heavy truck traffic.

The project will also be located in the open space land on the south side of the Santa Ana River in the City of Riverside. This open space is located between the Hidden Valley Wildlife Refuge and residential neighborhoods. The power line alignment appears to be close to the River and the wildlife area, approximately 50 feet below the residential neighborhoods to the south. The towers, at approximately 100 feet in height, will extend above the elevation of the homes, and effectively intrude directly into their views of the open space, river, wildlife refuge and mountains to the north. This is not only a significant negative impact on an existing residential neighborhood, but will deteriorate the value of the recreation and wildlife area.

In addition, Page 2-5 of the IS states: "...a few disturbances along Segment C would be located within riparian habitat, which was not analyzed in the 2013 RTRP EIR. Additional engineering refinements indicate that the relocation of distribution lines would need to be revised from the 2013 RTRP EIR project in three locations (Locations 5, 7, and 8) to accommodate the overhead alignment along Segment C (Figure 2.3-2)." The EIR should include an analysis of the revised locations and their impacts on this recreation and wildlife area.



6. Riverside General Plan Open Space And Conservation Element. The project alignment traverses the open space land on the south side of the Santa Ana River between where the power line crosses the river at the Goose Creek golf course to Van Buren Blvd. This land is protected open space under the City of Riverside Proposition R and Measure C, and abuts the Hidden Valley Wildlife Refuge. The Riverside Open Space and Conservation Element states: “*The Hidden Valley Wildlife Area is another existing attraction, which could host additional activities. The Task Force suggested cooperating with the County and State Department of Fish and Game (agencies which currently manage the property) to bring additional activities to the site. The continued protection of the Santa Ana River corridor and its drainages will be carried out through the following objective and policies.*” OBJECTIVE OS 7: *Turn the Santa Ana River Task Force “Vision” into reality.* This objective is supported by the following General Plan policies:

Policy OS-7.3: Preserve and expand open space along the Santa Ana River to protect water quality, riparian habit and recreational uses.

Policy OS-7.5: Improve the perception of public safety at authorized recreation locations along the river.

Policy OS-7.6: Partner with other jurisdictions, including the Regional Water Quality Control Board and the US Army Corps of Engineers, to minimize the impact of new development on

the river and bring about some of the enhancements envisioned by the Santa Ana River Task Force.

Further, Measure C, Section 5d, states: "Any future roads and/or utility service shall be located so as to protect the wildlife refuge, agricultural land, and open space character of the area."

The EIR should address the project's impact on and consistency with the City of Riverside Open Space and Conservation Element, Proposition R and Measure C.

In addition, Page 2-5 of the IS states: "...a few disturbances along Segment C would be located within riparian habitat, which was not analyzed in the 2013 RTRP EIR. Additional engineering refinements indicate that the relocation of distribution lines would need to be revised from the 2013 RTRP EIR project in three locations (Locations 5, 7, and 8) to accommodate the overhead alignment along Segment C (Figure 2.3-2)." The EIR should include an analysis of the revised locations and their impacts on the City of Riverside Open Space and Conservation Element, Proposition R and Measure C.

7. **Marshalling Yards and Defined Disturbance Areas:** New marshalling yards will be proposed at the intersection of Etiwanda Avenue and Cantu-Galleano Ranch Road (incorrectly identified as Etiwanda Avenue and Bellegrave Avenue in the Initial Study Checklist) and on Clay Street north of Van Buren Blvd. The 2013 RTRP EIR did not specify the locations of disturbance areas. The Subsequent EIR should analyze impacts to these disturbance areas for air quality, traffic, safe route to schools, drainage and flooding, noise and aesthetics. Further, it should be noted in the EIR that these sites will require discretionary Planning Commission approval pursuant to the City Zoning Ordinance section 18.33 b.

CULTURAL RESOURCES

8. **Cultural Resources Report.** The Cultural Resources Report submitted by SCE to the CPUC and posted on the CPUC website is listed "confidential" and is not available to the public. The findings and conclusions of the report should be addressed in the EIR.

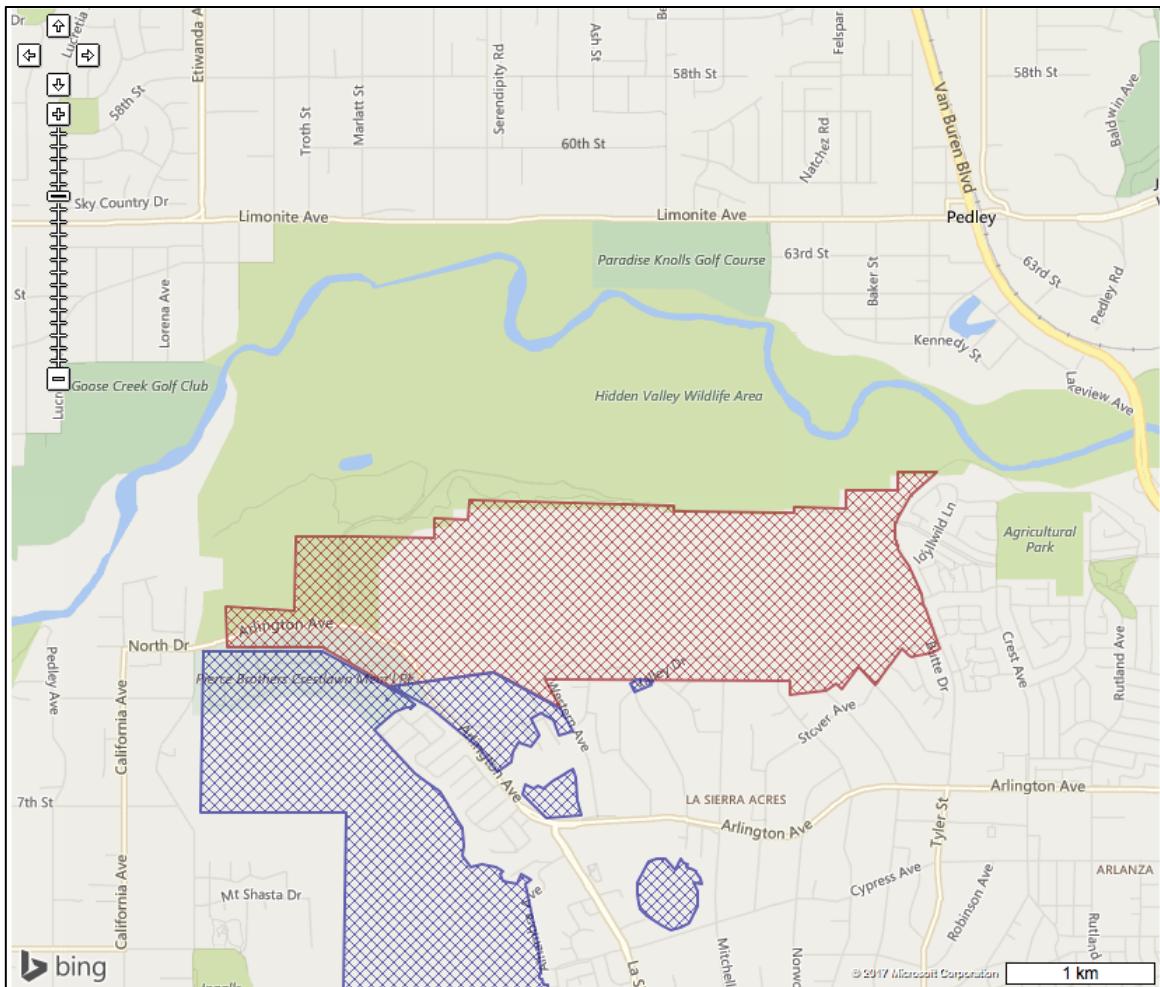
NOTE; Numerous other documents related to this project and the environmental documentation are listed on the CPUC web site as confidential. There is no explanation why these documents are confidential; therefore the public is not afforded the opportunity to fully analyze the proposed project to determine any related concerns that could arise from those documents.

BIOLOGICAL RESOURCES

9. **Santa Ana River Habitat.** The overhead transmission lines will traverse the Santa Ana River, with towers and lines placed within jurisdictional waters and riparian habitat. The Hidden Valley Wildlife Refuge, which is administered by the State Department of Fish and Wildlife and the County of Riverside, will be impacted by the project. The impacts on this environment from construction, potential tower or line failures, destruction of wildlife habitat, etc. should be disclosed. Further, Army Corps of Engineers, U.S. Fish and Wildlife, State Fish and Wildlife, State Resources Agency and the U.S. Environmental Protection Agency should be consulted and the comments or actions of these agencies should be disclosed.

In addition, Page 2-5 of the IS states: "...a few disturbances along Segment C would be located within riparian habitat, which was not analyzed in the 2013 RTRP EIR. Additional engineering refinements indicate that the relocation of distribution lines would need to be revised from the 2013 RTRP EIR project in three locations (Locations 5, 7, and 8) to accommodate the overhead alignment along Segment C (Figure 2.3-2)." The EIR should

include an analysis of the revised locations and their impacts on the City of Riverside Open



Space and Conservation Element, Proposition R and Measure C.

PROJECT ALTERNATIVES

10. **Environmentally Superior Alternative.** Several alternative alignments are known that would serve the project objectives, but not all have been seriously studied in the EIR prepared in 2010 by the RPU. Under CEQA, project cost is not a criterion for determining or ignoring an environmentally superior alternative project. In this case, an eastern alignment should be studied that avoids the aesthetic, industrial land use, biological, scenic resource, recreational land and environmental justice impacts. In addition, because the relocation of distribution lines would need to be revised from the 2013 RTRP EIR project in three locations (Locations 5, 7, and 8) to accommodate the overhead alignment along Segment C (Figure 2.3-2), the EIR should reconsider the previous analysis in the Environmentally Superior Alternative section.

NATIONAL ENVIRONMENTAL QUALITY ACT

11. **Environmental Impact Statement.** NEPA is required when a Federal action is taken that may have impacts on the human and natural environment. Federal actions are those that require Federal funding, permits, policy decisions, facilities, equipment, or employees. The

impacts to a river that is Federal jurisdiction suggest an EIS may be required. The environmental documents should address this issue and whether the project is subject to NEPA.

COMMENTS ON THE INITIAL STUDY PREPARED BY CPUC

The purpose of the following comments are to provide the lead agency with specific detail about the scope and content of the environmental topics that should be included in the draft EIR in response to the Notice of Preparation. Additional comments may be forthcoming on or before February 24, 2017

4.1 AESTHETICS

Impact 4.1A: The IS states: "*There are no designated scenic vistas in the vicinity of the underground alignment.*"

Comment: Page 2-5 of the EIR states in part: "...*a few disturbances along Segment C would be located within riparian habitat, which was not analyzed in the 2013 RTRP EIR. Additional engineering refinements indicate that the relocation of distribution lines would need to be revised from the 2013 RTRP EIR project in three locations (Locations 5, 7, and 8) to accommodate the overhead alignment along Segment C (Figure 2.3-2).*" The EIR needs to evaluate the impacts to scenic vistas as a result of the relocation of the above ground transmission lines to the westside of Wineville Avenue between Cantu-Galleano Ranch Road and Landon Drive; the relocation of the SCE-owned low voltage local overhead distribution lines in 4 locations that were not analyzed in the 2013 RTRP EIR; and the new disturbances along Segment C that would be located within riparian habitat.

Impact 4.1-C: The IS states: "*Additional analysis is required to address impacts on visual quality in areas north of the Santa Ana River.*"

Comment: It is unclear what is meant by "north of the Santa Ana River." The EIR needs to evaluate the impacts to visual character as a result of the relocation of the above ground transmission lines to the westside of Wineville Avenue between Cantu-Galleano Ranch Road and Landon Drive; the relocation of the SCE-owned low voltage local overhead distribution lines in 4 locations that were not analyzed in the 2013 RTRP EIR; the new disturbances along Segment C that would be located within riparian habitat; and the new marshalling area at the intersection of Etiwanda Avenue and Bellegrave Avenue.

4.3 AIR QUALITY:

Impact 4.3E: The IS states: "*No additional analysis is required to address objectionable odors.*"

Comment: The undergrounding of 2 miles of transmission lines within existing city streets would create odors from the operation of construction equipment and repaving of streets with asphalt. Sensitive receptors are located adjacent to these areas. Odor impacts need to be analyzed in the EIR.

4.4 BIOLOGICAL RESOURCES:

Impacts 4.4A through 4.4F: Page 2-5 of the IS states in part: "...*a few disturbances along Segment C would be located within riparian habitat, which was not analyzed in the 2013 RTRP EIR. Additional engineering refinements indicate that the relocation of distribution lines would need to be revised from the 2013 RTRP EIR project in three locations (Locations 5, 7, and 8) to accommodate the overhead alignment along Segment C (Figure 2.3-2).*"

Comment: The IS narrowly focuses on impacts to riparian habitat. The EIR needs to discuss impacts to **all** biological resources within the areas of new disturbances as a result of the realignment due to more refined engineering.

4.5 CULTURAL RESOURCES:

Impacts 4.5A through 4.5D: Pages 4-9 and 4-10 of the IS only indicate that cultural resources may be impacted within the revised overhead alignment; the new underground alignment, and in the Goose Creek Golf Club area.

Comment: The EIR needs to evaluate impacts to cultural resources in all new areas of disturbance including the marshaling yard at the intersection of Etiwanda Avenue and Bellegrave Avenue.

4.6 GEOLOGY AND SOILS:

Impacts 4.6A through 4.6D: The IS narrowly focuses on impacts that relate to the underground transmission line component of the project.

Comment: The EIR needs to discuss impacts to the marshaling yard at the intersection of Etiwanda Avenue and Bellegrave Avenue.

4.7 GREENHOUSE GAS EMISIONS:

Impact 4.7A: Page 4-12: The IS makes an assumption that GHG emissions as a result of construction would be greater than those analyzed in the 2013 RTRP EIR but concludes GHG will not exceed SCAQMD thresholds because construction emissions would be amortized over 30-years.

Comment: The IS should not reach this conclusion without some factual evidence. As such, this impact should not be screened out of the EIR.

4.10 LAND USE AND PLANNING:

Impact 4.10B and 4.10C: Page 4-21 of the IS states: "*The underground transmission lines would be located within the same land use zones identified in the 2013 RTRP EIR. The CPUC has the sole authority for siting and design of the project under General Order 131-d. The project is exempt from local land use policies. The project changes would not result in new conflicts with local land use plan, polices or regulations.... No additional analysis of potential conflicts with plans and policies is required.*

Comment: See Comment No.4 in Section II above.

4.12 NOISE:

Impact 4.12A through 4.12D: Page 4-223 of the IS states: "*No additional analysis is required to evaluate the impact of noise in regards to local ordinances and standards.*" The IS further states: "*The project changes would be constructed within the allowed construction hours and would not generate noise in excess of standards.*"

Comment: These conclusions are based on a determination by the IS preparer that construction noise is exempt from noise limits in Jurupa Valley if the construction activity occurs within certain hours. The City's Noise Ordinance states: "*This chapter is not intended to establish thresholds of significance for the purpose of any analysis required by the California Environmental Quality Act and no such thresholds are established.* In addition, compliance with a local noise ordinance is not necessarily dispositive whether a project's noise impacts are significant. As such, the EIR should evaluate noise impacts for construction including activities that take place at the marshaling yard at the intersection of Etiwanda Avenue and Bellegrave Avenue.

4.17 UTILITIES AND SERVICE SYSTEMS:

Impact 4.17F: On page 4-31 the IS states in part “*The solid waste generated by the construction of the revised project would be similar to the materials described in the 2013 RTRP EIR...*”

Comment: The 2013 RTRP EIR did not include an analysis of 2 miles of underground transmission lines and the resultant waste generated by such an activity. The EIR should discuss this change in the project.