

**SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



ITEM: 13.2  
(ID # 12991)

**MEETING DATE:**  
Tuesday, August 25, 2020

**FROM:** Regional Parks and Open Space District:

**SUBJECT:** REGIONAL PARK & OPEN-SPACE DISTRICT: Adoption of Resolution 2020-010 Making Responsible Agency Findings Pursuant to the California Environmental Quality Act (CEQA) and Issuing Certain Limited Approvals for the Riverside Transmission Reliability Project Pursuant to CEQA and Approval of Land and Water Conservation Fund Conversion of Lands in Hidden Valley Wildlife Area, District 1; [\$0]

**RECOMMENDED MOTION:** That the Board of Directors:

1. Adopt Resolution 2020-010 Making Responsible Agency Findings Pursuant to CEQA and Issuing Certain Limited Approvals for the Riverside Transmission Reliability Project and Approval of Land and Water Conservation Fund Conversion of Lands in Hidden Valley Wildlife Area;
2. Authorize the Chairman of the Board to execute the same on behalf of Riverside County Regional Park & Open-Space District ("RivCoParks") and to execute any other documents required to complete the transaction;
3. Direct the Clerk of the Board to file the attached Notice of Determination with the County Clerk for posting within five working days of Board approval; and
4. Direct the Clerk of the Board to file the attached Notice of Exemption with the County Clerk for posting within five working days of Board approval.

**ACTION: Consent**


  
Kyla R. Brown, General Manager 7/10/2020

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**MINUTES OF THE BOARD OF DIRECTORS**

On motion of Supervisor Spiegel, seconded by Supervisor Hewitt and duly carried, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Spiegel, Washington, Perez and Hewitt  
Nays: None  
Absent: Jeffries  
Date: August 25, 2020  
xc: Parks

Kecia R. Harper  
Clerk of the Board  
By:   
Deputy

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STATE OF CALIFORNIA**

<b>FINANCIAL DATA</b>	<b>Current Fiscal Year:</b>	<b>Next Fiscal Year:</b>	<b>Total Cost:</b>	<b>Ongoing Cost</b>
<b>COST</b>	\$0	\$0	\$0	\$0
<b>NET COUNTY COST</b>	\$0	\$0	\$0	\$0
<b>SOURCE OF FUNDS: None</b>			<b>Budget Adjustment: No</b>	
			<b>For Fiscal Year: 20/21</b>	

**C.E.O. RECOMMENDATION:** Approve

**BACKGROUND:**

**Summary**

In order to complete a 10-mile span of the Riverside Transmission Reliability Project ("RTRP"), SCE seeks authority to construct a new 230 kilovolt ("kV") Wildlife Substation and associated facilities within Hidden Valley Wildlife Area ("Hidden Valley") located in the City of Riverside. This Wildlife Substation will connect approximately 10 miles of 230-kV transmission line to the existing Mira Loma Substation, along with new telecommunications facilities between the existing Mira Loma and Vista Substations, and the proposed Wildlife Substation.

Riverside's system peak load has exceeded its capacity under normal operating conditions every year since 2006, except for 2008 during the economic recession, and Riverside's forecast shows that its system peak load will continue to increase over the next 20 years. Of the 56 load-serving entities in California, only Riverside, Anaheim Public Utilities ("APU") and Pasadena Water and Power ("PWP") have a single interconnection point. Unlike Riverside, APU and PWP are served at a higher transmission level.

During the planning phases of the RTRP, it was discovered that the Wildlife Substation would require the use of lands protected by the Land and Water Conservation Fund ("LWCF") Act of 1965 that are owned by RivCoParks. Due to the LWCF designation, an Environmental Screening Form ("ESF") will be submitted to the National Parks Service to approve a land swap to replace the LWCF designated lands needed for RTRP through Hidden Valley. In order for the Director of NPS to approve the LWCF Section 6(f)(3) Conversion Proposal, RivCoParks' Board of Directors needs to provide approval of the land swap. Such approval would include direction to RivCoParks' staff to take those actions necessary, including execution of documents, to result in the removal of the LWCF designation from the approximately 10.8 acres of land needed for the RTRP through the Hidden Valley Wildlife Area and getting approximately 10.8 acres of adjacent replacement land designated under the LWCF. The Hidden Valley Wildlife Area would also be extended to include the area of replacement lands.

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The City of Riverside is a co-owner with RivCoParks of the LWCF replacement lands and submitted a letter of support for the conversion.

**CEQA-Compliance**

As the original lead agency for the RTRP Project, the City of Riverside prepared an Environmental Impact Report ("EIR") for RTRP and, on February 5, 2013, certified the EIR and approved the portion of the project under its jurisdiction. Before and after the City of Riverside certified the EIR, the City of Jurupa Valley approved residential and commercial developments within the proposed alignment for SCE's portion of RTRP. As a result, in September 2016, SCE revised its proposed transmission line route to avoid these projects. These revisions posed potentially new or increased impacts that were not addressed in the 2013 EIR. Accordingly, the California Public Utilities Commission's ("CPUC") Energy Division prepared a subsequent environmental impact report ("SEIR") to address the impacts of the revised portion of the project ("Revised Project"). The SEIR was issued on October 2, 2018. It evaluated four alternatives to the revised portion of the project that would meet the project objectives, as well as a No Project Alternative as required by CEQA. The Revised Project identified shifts the alignment and puts approximately 2 miles of the transmission lines underground, instead of above ground as proposed in the original project.

The CPUC certified the SEIR and approved the RTRP Revised Project on March 12, 2020. The statute of limitations period has run for any legal challenge under CEQA against CPUC's approvals.

RivCoParks has limited approval and implementing authority over RTRP, and thus serves only as a responsible agency for the RTRP pursuant to the requirements of CEQA. RivCoParks' staff recommends the adoption of Resolution 2020-010 to make the requisite responsible agency CEQA findings for the limited approvals associated with RTRP and to approve the Project, including those actions necessary to result in the conversion of LWCF designated land and extension of the Hidden Valley Wildlife Area. As set forth in greater detail in Resolution No. 2020-010, the SEIR fully evaluated the removal of the LWCF designation from 10.8 acres and the RTRP's use of the land that was previously designated under the LWCF. The designation of 10.82 acres of replacement land under the LWCF and the extension of the boundaries of the Hidden Valley Wildlife Area to include that replacement land is also exempt pursuant to State CEQA Guidelines section 15061(b)(3) (Common Sense Exemption), 15307 (actions by regulatory agencies for the protection of natural resources) and 15308 (actions by regulatory agencies for protection of the environment). The project is exempt from CEQA pursuant to State CEQA Guidelines sections 15307 and 15308 because it would result in the designation of the 10.8 acres of replacement land as LWCF Section 6(f)(3) land and the expansion of the Hidden Valley Wildlife Area, which will assure the maintenance, restoration, enhancement, and protection of the environment in those

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10.8 acres. The replacement land site's historical use has been open space and agricultural lease land. As a result of the project, it will continue to be utilized as open space, and its environment and natural resources will be protected as a result of the extension of the Hidden Valley Wildlife Area and support visual, cultural, and biological values.

**Impact on Citizens and Businesses**


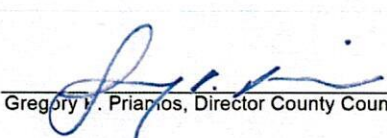
The RTRP will serve citizens and businesses by providing the City of Riverside with a second source line that includes enough capacity to accommodate Riverside's existing and projected load needs, while maintaining recreational opportunities within the Hidden Valley Wildlife area.

**Additional Fiscal Information**

No net cost will be incurred and no budget adjustment necessary.

**Attachments**

- Resolution 2020-010
- Notice of Determination
- Notice of Exemption
- Environmental Screening Form
- Letter of Support from City of Riverside

 _____ Douglas Cardonez Jr.	 _____ 8/17/2020	 _____ Gregory H. Priamos, Director County Counsel	7/22/2020
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2  
3 **RESOLUTION NO. 2020-10**

4 **RESOLUTION OF THE BOARD OF DIRECTORS OF THE RIVERSIDE COUNTY**  
5 **REGIONAL PARK AND OPEN-SPACE DISTRICT CONSIDERING AN ENVIRONMENTAL**  
6 **IMPACT REPORT FOR THE SOUTHERN CALIFORNIA EDISON RIVERSIDE**  
7 **TRANSMISSION RELIABILITY PROJECT, MAKING RESPONSIBLE AGENCY FINDINGS**  
8 **PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, ADOPTING A**  
9 **MITIGATION MONITORING AND REPORTING PLAN, AND ISSUING CERTAIN**  
10 **APPROVALS FOR THE PROJECT**

11  
12 **WHEREAS**, in 2006, the California Independent System Operator directed Southern California  
13 Edison (“SCE”) to build the Riverside Transmission Reliability Project (“RTRP”), which entails a  
14 transmission line, substation, and interconnection and telecommunication facilities in the County of  
15 Riverside and the cities of Jurupa Valley, Norco, and Riverside; and

16 **WHEREAS**, the City of Riverside, as the original lead agency under the California  
17 Environmental Quality Act (“CEQA”) for the RTRP project determined that the RTRP could have  
18 significant impacts on the environment and prepared a Draft Environmental Impact Report (“EIR”) in  
19 2011 and a Final EIR in 2012; and

20 **WHEREAS**, the Riverside City Council certified the EIR on February 5, 2013 and approved the  
21 portion of the RTRP project under its jurisdiction; and

22 **WHEREAS**, the City of Jurupa Valley approved residential and commercial developments within  
23 the proposed transmission line route, conflicting with the originally planned route; and

24 **WHEREAS**, in 2016, SCE therefore revised the transmission line route to avoid the entitled  
25 development projects and to underground portions of the transmission line; and

26 **WHEREAS**, the project revisions posed potentially new or increased impacts that were not  
27 addressed in the EIR that had been certified in 2013; and

FORM APPROVED COUNTY COUNSEL  
BY: *M.R. Cushman*  
DATE: July 21, 2020  
MELISSA R. CUSHMAN

1           **WHEREAS**, the California Public Utilities Commission (“CPUC”) acted as lead agency to  
2 prepare a Subsequent EIR (“SEIR”) to address the project changes and new circumstances; and

3           **WHEREAS**, on March 12, 2020, the CPUC certified the SEIR and approved the 230-kV  
4 transmission line, approximately 2 miles of which are to be constructed underground, relocation of  
5 existing subtransmission lines, a new substation (“the Wildlife Substation”), and upgrades to existing  
6 substations and telecommunication infrastructure (“Revised Project”); and

7           **WHEREAS**, the Wildlife Substation requires the use of lands co-owned by the City of Riverside  
8 and the Riverside County Park and Open Space District (“RivCoParks”) and that has been designated as  
9 protected pursuant to the Land and Water Conservation Fund (“LWCF”) Act of 1965; and

10           **WHEREAS**, accordingly, a land swap has been proposed to remove the LWCF designation for  
11 10.8 acres of land needed for the RTRP through Hidden Valley Wildlife Area (“LWCF Designated  
12 Land”) and to designate an adjacent 10.8 acres under the LWCF Act (“Replacement Land”) and extend  
13 the boundaries of Hidden Valley Wildlife Area to also include the Replacement Land; and

14           **WHEREAS**, the SEIR fully evaluated the removal of the LWCF designation from the LWCF  
15 Designated Land and the use of the LWCF Designated Land for transmission line and substation  
16 purposes; and

17           **WHEREAS**, pursuant to CEQA, including State CEQA Guidelines sections 15091 and 15096(h),  
18 RivCoParks has more limited approval and implementing authority over the Revised Project and thus  
19 serves only as a responsible agency for the Project pursuant to the requirements of CEQA; and

20           **WHEREAS**, the Board of Directors of the RivCoParks (“Board of Directors”), in regular session  
21 assembled on August 25, 2020, reviewed and considered the Final SEIR and other related documents in  
22 the record before it; and

23           **WHEREAS**, all the procedures of CEQA and the State CEQA Guidelines have been met, and the  
24 final SEIR is sufficiently detailed so that all of the potentially significant effects of the Revised Project on  
25 the environment and measures necessary to avoid or substantially lessen such effects have been evaluated  
26 in accordance with CEQA; and

27           **WHEREAS**, as a responsible agency, RivCoParks has verified that the certified Final SEIR  
28 adequately analyzes the potential environmental impacts associated with the removal of the LWCF

1 designation from the LWCF Designated Land, which is RivCoParks' limited role in the implementation  
2 of the Revised Project; and

3         **WHEREAS**, as contained herein, RivCoParks has endeavored in good faith to set forth the basis  
4 for its decision on the Revised Project; and

5         **WHEREAS**, all of the findings and conclusions made by the Board of Directors pursuant to this  
6 resolution are based upon the oral and written evidence presented to it as a whole and not based solely on  
7 the information provided in this resolution; and

8         **WHEREAS**, all procedures of CEQA have been met and all other legal prerequisites to the  
9 adoption of this resolution have occurred.

10         **NOW, THEREFORE**, the Board of Directors of the Riverside County Park and Open-Space  
11 District does hereby resolve as follows and make the following findings:

12                 SECTION 1. CEQA Actions.

- 13                 (a)         Consideration of the EIR and Adoption of Findings Regarding CEQA  
14                                 Compliance. As the decision-making body for RivCoParks, and in  
15                                 RivCoParks' limited role as a responsible agency under CEQA, the Board  
16                                 of Directors has received, reviewed, and considered the information  
17                                 contained in the Final SEIR for the Revised Project, all comment letters, all  
18                                 other related documents, and all oral commentary on the Revised Project.  
19                                 Based on this review, the Board of Directors finds, as to those potential  
20                                 environmental impacts within RivCoParks' powers and authorities as  
21                                 responsible agency, that the EIR for the Revised Project contains a  
22                                 complete, objective, and accurate reporting of those potential impacts and  
23                                 reflects the independent judgment and analysis of RivCoParks. RivCoParks  
24                                 has been provided copies of the findings, Statement of Overriding  
25                                 Considerations, and MMRP adopted in connection with the EIR, and copies  
26                                 of those documents are on file with and available for inspection at  
27                                 RivCoParks office, address set forth below.  
28

1 (b) CEQA Findings on Environmental Impacts. In its limited role as a  
2 responsible agency under CEQA, RivCoParks finds that there are no  
3 feasible alternatives to the Revised Project which would avoid or  
4 substantially lessen the Revised Project's potentially significant  
5 environmental impacts but still achieve most of the Revised Project's  
6 objectives. The RivCoParks further finds that the mitigation measures  
7 imposed by the lead agency are sufficient to reduce all potentially  
8 significant impacts to a level of less than significant or to avoid or  
9 substantially lessen the Revised Project's potentially significant impacts but  
10 still achieve the Revised Project's objectives. The RivCoParks further finds  
11 that the Statement of Overriding Considerations adopted by the CPUC is  
12 supported by substantial evidence and that each overriding consideration  
13 outweighs the Revised Project's potentially significant impacts. As such,  
14 RivCoParks concurs with the environmental findings adopted by the lead  
15 agency, which are attached hereto as Exhibit A, and therefore RivCoParks  
16 adopts those findings as its own and incorporates them herein.

17 (c) Adoption of Mitigation Monitoring and Reporting Program. RivCoParks  
18 hereby approves and adopts the Mitigation Monitoring and Reporting  
19 Program prepared for the Revised Project and approved by the lead agency,  
20 which is attached hereto as Exhibit B and incorporated herein by reference.

21 SECTION 2. Approval of the Project. As required by State CEQA Guidelines section  
22 15096 and in its limited role as responsible agency under CEQA,  
23 RivCoParks hereby approves the Revised Project. RivCoParks also  
24 approves those actions necessary to result in the designation of the  
25 Replacement Land under the LWCF Act and extend the boundaries of  
26 Hidden Valley Wildlife Area to include the Replacement Land and directs  
27 staff to carry them out in a manner consistent with this resolution.

28 SECTION 3. Notice of Determination. RivCoParks hereby directs staff to file a Notice of



1 Determination with the Riverside County Clerk and also with the  
2 Governor's Office of Planning and Research within five (5) working days  
3 of the approval of the Revised Project.

4 SECTION 4. Custodian of Records. The documents and materials that constitute the  
5 record of proceedings on which these findings are based are located at the  
6 offices of the Riverside County Regional Park and Open-Spaced District  
7 office, 4600 Crestmore Rd., Riverside, CA 92509.

8 SECTION 5. Execution of Resolution and Agreement. The Chair of the Board of  
9 Directors of RivCoParks shall sign this Resolution and the Clerk of the  
10 Board shall attest and certify to the passage and adoption thereof.

11  
12 ROLL CALL:

13 Ayes: Jeffries, Spiegel, Washington, Perez and Hewitt  
14 Nays: None  
15 Absent: None

16 The foregoing is certified to be a true copy of a resolution duly  
17 adopted by said Board of Supervisors on the date therein set forth.

18 Kecia R. Harper, Clerk of said Board

19 By Priscilla Gasso  
20 Deputy

**Notice of Determination**

To: Office of Planning and Research  
For U.S. Mail: P.O. Box 3044  
Sacramento, CA 95812-3044

Street Address: 1400 Tenth Street  
Sacramento, CA 95814

From: Riverside County Park and Open-Space District  
4600 Crestmore Rd.  
Jurupa Valley, CA 92509  
Contact: Shannon Chamberlain  
Phone: 1-800-234-7275

County Clerk  
County of Riverside  
2724 Gateway Drive  
Riverside, CA 92507

Lead Agency: California Public Utilities Comm.

Subject: Filing of Notice of Determination in compliance with Public Resources Code section 21152 and State CEQA Guidelines section 15096(i)

State Clearinghouse Number: 2007011113

Project Title: Riverside Transmission Reliability Project

Project Location

County of Riverside, in the Cities of Jurupa Valley, Norco, and Riverside

Original Negative Declaration/Notice of Determination was routed to County Clerks for posting on.

8/31/20 Date YPR Initial

Project Description

The project involves constructing a new 230-kV transmission line, relocation of existing sub-transmission lines, a new substation, and upgrades to existing substations and telecommunication infrastructure. Approximately 2 miles of the transmission line would be constructed underground within the City of Jurupa Valley. The project also involves sub-transmission project elements proposed by the City of Riverside.


Determination

This is to advise that the Riverside County Park and Open-Space District has acted as a responsible agency and approved its portion of the above-described Project on August 4, 2020 and, pursuant to the California Environmental Quality Act ("CEQA"), has made the following determinations regarding the above described Project:

- 1) The Project will have a significant effect on the environment.
- 2) Riverside County Park and Open-Space District considered the Environmental Impact Report ("EIR") as prepared and certified by the California Public Utilities Commission.
- 3) Mitigation measures were made a condition of the approval of the Project.
- 4) A Mitigation Monitoring Program was adopted for this Project.
- 5) A Statement of Overriding Considerations was adopted for this Project.
- 6) Findings were made pursuant to the provisions of CEQA.

Public Access to Environmental Document

The EIR and record of the lead agency's project approval is available to the General Public at <https://www.cpuc.ca.gov/environment/info/panoramaenv/RTRP/index.html>; the EIR and record of the responsible agency's approval is available at the Riverside County Park and Open-Space District office located at 4600 Crestmore Rd. Jurupa Valley CA 92509.

  
Signature (Public Agency)

1/14/2020  
Date

Senior Park Planner  
Title

Date Received for Filing



# Riverside County Regional Park and Open-Space District

Kyla Brown, Parks Director/General Manager | Erin Gettis, Assistant Director

**DATE:** July 7, 2020  
**TO:** Cassandra Cordova  
**FROM:** Michael Alferez  
**RE:** Accounting String for Notice of Determination Filing Fees

Please utilize the accounting string below to charge the Park District for the Notice of Determination fees for the following project:

**2020/21-002 LWCF Conversion and CEQA Resolution**

FUND	DEPTID	ACCOUNT	CLASS	PROJECT
25400	931210	537080		PK-RTRP

Please provide a copy of the posted journal via email to [Parks-Finance@rivco.org](mailto:Parks-Finance@rivco.org)

If you have any questions or experience any difficulties in using the above accounting string, please do not hesitate to contact me.

Thank you,

**Michael Alferez**  
*Supervising Accountant*  
951-955-5462



**Notice of Exemption**

**Appendix E**

To: Office of Planning and Research  
P.O. Box 3044, Room 113  
Sacramento, CA 95812-3044

From: (Public Agency): \_\_\_\_\_  
Riverside County Park and Open-Space District  
4600 Crestmore Rd., Jurupa Valley, CA 92509

County Clerk  
County of Riverside  
2724 Gateway Drive  
Riverside, CA 92507

(Address)

Original Negative Declaration/Notice of Determination was routed to County Clerks for posting on.

8/31/20  
Date

*WR*  
Initial

**Project Title:** Designation of 10.82 acres of land under the Land and Water Conservation Fund Act of 1965 ("LWCF")

**Project Applicant:** Riverside County Park and Open-Space District

**Project Location - Specific:** Hidden Valley Wildlife Area; 11401 Arlington Road.

**Project Location – City:** Riverside **Project Location – County:** Riverside

**Description of Nature, Purpose and Beneficiaries of Project:** Replacement of 10.82 acres of land in the City of Riverside to be designated as Section 6(f) lands under the LWCF and extension of the Hidden Valley Wildlife Area over same

**Name of Agency Approving Project:** Riverside County Park and Open-Space District

**Name of Person or Agency Carrying Out Project:** Riverside County Park and Open-Space District

Exempt Status: (check one):

Ministerial (Sec. 21080(b)(1); 15268);

Declared Emergency (Sec. 21080(b)(3); 15269(a));

Emergency Project (Sec. 21080(b)(4); 15269(b)(c));

**X** **Categorical Exemption.** State type and section number: **15307, 15308**

Statutory Exemptions. State code number:

**X** **Other:** The project is exempt from CEQA pursuant to the "common sense" exemption (CEQA Guidelines, § 15061(b)(3)).

**Reasons why project is exempt:**

In order to complete a 10-mile portion of the Riverside Transmission Reliability Project ("RTRP"), Southern California Edison certified Supplemental Environment Impact Report and approved the construction of a new 230 kilovolt ("kV") Wildlife Substation and associated facilities with the Hidden Valley Wildlife Area, located in the City of Riverside. During the planning phases, it was discovered that the Wildlife Substation would require the use of lands protected by the LWCF. This project would result in 10.82 acres of replacement land being designated as LWCF Section 6(f) lands, to replace the 10.82 acres having its LWCF Section 6(f) designation removed as a result of the RTRP. The replacement land is immediately adjacent to the 10.82 removed acres and will result in the expansion of the Hidden Valley Wildlife Area boundary by 10.82 acres.

The extension of the LWCF designation and expansion of the Hidden Valley Wildlife Area boundary is exempt from the California Environmental Quality Act ("CEQA") pursuant to State CEQA Guidelines section 15061(b)(3), 15307 (actions by regulatory agencies for the protection of natural resources) and 15308 (actions by regulatory agencies for protection of the environment).

...continued...



# Riverside County Regional Park and Open-Space District

Kyla Brown, Parks Director/General Manager | Erin Gettis, Assistant Director

**DATE:** August 2, 2018  
**TO:** Mary Ann Meyer  
**FROM:** Jeanne McLeod  
**RE:** Accounting String for Internal Charges - Notice of Exemption

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Please utilize the accounting string below to charge the Park District for the Notice of Exemption fees for the following project:

**2020/21-002 LWCF Conversion and CEQA Resolution**

FUND	DEPTID	ACCOUNT	PROJECT
25400	931210	537080	PK-RTRP

Please provide a copy of the posted journal via email to [Parks-Finance@rivco.org](mailto:Parks-Finance@rivco.org)

If you have any questions or experience any difficulties in using the above accounting string, please do not hesitate to contact me.

Thank you,



Jeanne McLeod

*Contracts and Grants Analyst*

(951) 955-3819



Exhibit A

ALJ/HSY/gp2

Date of Issuance: 3/18/2020

Decision 20-03-001 March 12, 2020

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

In the Matter of the Application of  
Southern California Edison Company  
(U338E) for a Certificate of Public  
Convenience and Necessity for the  
RTRP Transmission Project.

Application 15-04-013

**DECISION GRANTING A CERTIFICATE OF PUBLIC CONVENIENCE AND  
NECESSITY FOR THE RIVERSIDE TRANSMISSION RELIABILITY PROJECT**

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**DECISION GRANTING A CERTIFICATE OF PUBLIC CONVENIENCE AND  
NECESSITY FOR THE RTRP TRANSMISSION PROJECT**

**Summary**

This decision grants Southern California Edison Company a certificate of public convenience and necessity for the Riverside Transmission Reliability Project. Provided that the City of Jurupa Valley grants Southern California Edison Company a superior easement protecting against the mandatory relocation of underground project facilities in consideration of the undergrounding of those project facilities, the project shall be constructed as Alternative 1 with the mitigation identified in the final and subsequent environmental impact reports prepared for the project. If the City of Jurupa Valley does not meet those terms, the project shall be constructed as the revised proposed project with the mitigation identified in the final and subsequent environmental impact reports prepared for the project.

We find and certify that the subsequent environmental impact report prepared for the project meets the requirements of the California Environmental Quality Act and that the project benefits of providing the City of Riverside with a second source line are overriding considerations that serve the public convenience and necessity and outweigh Alternative 1's unavoidable impacts on aesthetics, air quality, noise and transportation and traffic, and its contribution to cumulative hydrology and water quality impacts, and the revised proposed project's unavoidable impacts on aesthetics, agricultural and forestry resources, noise and transportation and traffic, and its contribution to cumulative hydrology and water quality impacts.

This proceeding is closed.



## 1. Background

By this application, Southern California Edison Company (SCE) seeks a certificate of public convenience and necessity (CPCN) to construct the Riverside Transmission Reliability Project (RTRP) pursuant to Pub. Util. Code § 1001. The RTRP would increase transmission capacity and provide a second point of interconnection for bulk power transmission to Riverside Public Utilities and its customers.

Project approval is subject to environmental review under the California Environmental Quality Act (CEQA) and pursuant to General Order (GO) 131-D. If a proposed project may have a significant impact on the environment, CEQA requires the preparation of an environmental impact report (EIR) that identifies the project's environmental impacts, designs a recommended mitigation program to reduce any potentially significant impacts and identifies, from an environmental perspective, the preferred project alternative. CEQA provides that a permitting agency may not approve the project unless it requires all mitigation measures identified in the EIR, unless the permitting agency finds them to be infeasible, and determines that there are overriding considerations that merit project approval despite the unmitigable environmental impacts. CEQA further provides for the preparation of a subsequent EIR if, among other things, substantial changes occur which will require major revisions of the EIR.

The RTRP includes components that would be owned and operated separately by Riverside Public Utilities and SCE. As lead agency, the City of Riverside (Riverside) prepared an EIR for the project and, on February 5, 2013, certified the EIR and approved the portion of the project under its jurisdiction.

Before and after Riverside certified the EIR, the City of Jurupa Valley (Jurupa Valley) approved residential and commercial developments within the

proposed alignment for SCE's portion of RTRP. As a result, in September 2016, SCE revised its proposed transmission line route to avoid these projects. These revisions posed potentially new or increased impacts that were not addressed in the 2013 EIR. Accordingly, the Commission's Energy Division prepared a subsequent environmental impact report (SEIR) to address the impacts of the revised portion of the project (revised project). The SEIR issued on October 2, 2018.

A prehearing conference was held on November 13, 2018, and the assigned Commissioner's scoping memo issued on December 20, 2018.

Evidentiary hearing was held on September 4, 5 and 6, 2019. SCE, Riverside, the California Independent System Operator (CAISO), Sky Country Investment Co./East, LLC (Sky Country), Lesso Mall Development Jurupa Valley Limited (Lesso), Jurupa Valley, and the Public Advocates Office filed opening briefs on September 27, 2019, and reply briefs on October 18, 2019, upon which the matter was submitted.

## **2. Issues to be Determined**

Pursuant to the assigned Commissioner's scoping memo, the issues to be determined are:

1. What are the significant environmental impacts of the proposed project? This issue encompasses consideration of recreational and park areas, historical and aesthetic values, and influence on the environment pursuant to Pub. Util. Code § 1002(a)(2-4).
2. Are there potentially feasible mitigation measures that will eliminate or lessen the significant environmental impacts?
3. As between the proposed project and the project alternatives, which is environmentally superior?
4. Did the Commission review and consider the SEIR prior to approving the project or a project alternative, and was the

SEIR completed in compliance with CEQA and reflect the Commission's independent judgment?

5. Are the mitigation measures or project alternatives infeasible? This issue encompasses consideration of community values pursuant to Pub. Util. Code § 1002(a)(1).
6. To the extent that the proposed project and/or project alternatives results in significant and unavoidable impacts, are there overriding considerations that nevertheless merit Commission approval of the proposed project or project alternative?
7. Does the proposed project serve a present or future public convenience and necessity? This issue directly overlaps issue 6, above.
8. What is the maximum prudent and reasonable cost of the project? (*See* Pub. Util. Code § 1005.5.)
9. Does the project design comply with the Commission's policies governing the mitigation of electric and magnetic field (EMF) effects using low-cost and no-cost measures?

### **3. Project Description**

The elements of the RTRP that would be owned and operated by SCE and for which SCE seeks authority to construct include a new 230 kilovolt (kV) "Wildlife Substation" and associated facilities, approximately 10 miles of 230-kV transmission line connecting the Wildlife Substation to the existing Mira Loma Substation, and new telecommunications facilities between the existing Mira Loma and Vista Substations and the proposed Wildlife Substation.

The Wildlife Substation would be located at the northern city limit of the City of Riverside near the intersection of Van Buren Boulevard and the Santa Ana River. The transmission line route would proceed west for approximately six miles along the Santa Ana River corridor toward Interstate 15 and then turn north for approximately four miles to the existing Mira Loma - Vista #1 230-kV transmission line in the northwestern corner of the

City of Jurupa Valley near the intersection of Interstate 15 and Highway 60. The transmission line would proceed west from the Wildlife Substation within the Santa Ana River corridor toward Interstate 15 and then north alongside Interstate 15 to the Mira Loma - Vista #1 transmission line.

As originally proposed and reviewed in the EIR, the entirety of the transmission line would be installed above ground. The revised project would underground approximately 2 miles of the transmission line within the City of Jurupa Valley, consisting of the last westerly mile through the first northerly mile. In addition, the revised project would relocate the northernmost half-mile of the transmission line from the east side of Wineville Avenue to the west side, and would relocate an existing distribution line underground at two locations for a total distance of 2,800 feet and install a distribution riser pole at either end of each distribution line relocation. The revised project would also add one new marshalling yard that would be used throughout construction of the entire RTRP.

#### **4. Environmental Impacts**

The revised project would have significant impacts on aesthetics, agriculture and forestry resources, air quality and greenhouse gases, biological resources, cultural, tribal and paleontological resources, hazards and hazardous materials, noise, public services and utilities, recreation, and transportation and traffic, and a significant cumulative contribution to cumulative hydrology and water quality impacts. While impacts to air quality and greenhouse gases, biological resources, cultural, tribal and paleontological resources, hazards and hazardous materials, hydrology and water quality, public services and utilities and recreation can be mitigated to a less-than-significant level with the mitigation measures identified in the Mitigation Monitoring and Reporting Plan

(MMRP) contained in the EIR and SEIR, the revised project's impacts on aesthetics, agricultural and forestry resources, noise and transportation and traffic, and its contribution to cumulative hydrology and water quality impacts would remain significant and unavoidable.

With respect to aesthetics, the 230 kV transmission line and the introduction of riser poles would significantly affect scenic vistas occurring along the Santa Ana River corridor including the Santa Ana River National Recreation Trail, portions of the Santa Ana River Regional Park, and the Hidden Valley Wildlife Area; in several residential neighborhoods in the City of Riverside; and from local roadways, parks, and recreational areas within the City of Jurupa Valley.

With respect to agricultural and forestry resources, the presence of overhead 230 kV transmission line poles and towers would permanently convert prime farmland, unique farmland and farmland of statewide importance to non-agricultural uses.

With respect to noise, construction of the underground transmission line vaults and duct banks would substantially temporarily or periodically increase ambient noise levels in the vicinity.

With respect to traffic, temporary road and lane closures during construction would substantially conflict with the City of Jurupa Valley's and the City of Riverside's traffic management plans by reducing the level of service.

With respect to hydrology and water quality, construction and operation of the revised project would incrementally increase runoff, sedimentation, and pollutant concentrations that, when combined with past, present and future projects, could contribute to water quality impacts for the watershed.

## **5. Revised Project Alternatives**

The SEIR evaluated four alternatives to the revised portion of the project that would meet the project objectives, as well as the No Project Alternative as required by CEQA.<sup>1</sup>

### **5.1 Alternative 1**

The Bellegrave-Pats Ranch Road Underground Alternative (Alternative 1) would begin and transition to underground immediately adjacent to the tie-in to the Mira Loma-Vista #1 230 kV transmission line and travel south within Wineville Avenue for approximately 0.7 miles, then west within Bellegrave Avenue for approximately 0.2 miles, and then south within Pats Ranch Road for approximately 1.2 miles to the intersection of Pats Ranch Road and Limonite Avenue, at which point it would follow the same underground alignment as the revised project.

Alternative 1 would reduce, but not eliminate, the impact on visual quality as the riser poles in the Goose Creek Golf Course and overhead 230 kV transmission line south of the Santa Ana River would still degrade the scenic quality of views from parks and recreational areas within Jurupa Valley as well as throughout the Santa Ana River corridor. It would avoid any impact to agricultural and forestry resources, but it would increase the significant and unavoidable impacts to noise and traffic during construction, relative to the revised project. Significant contributions to cumulative hydrology and water quality impacts would remain unchanged.

### **5.2 Alternative 2**

The Wineville-Limonite Underground Alternative (Alternative 2) would likewise begin and transition to underground immediately adjacent to the tie-in

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<sup>1</sup> CEQA Guidelines Section 15126.6(e)(3)(B).

to the Mira Loma-Vista #1 230 kV transmission line, but would travel south within Wineville Avenue for approximately two miles, at which point it would turn west within Limonite Avenue for approximately 1,000 feet before turning south within Pats Ranch Road to follow the same underground alignment as the revised project.

As with Alternative 1, Alternative 2 would reduce, but not eliminate, the impact on visual quality and avoid any impact to agricultural and forestry resources and would increase the significant and unavoidable impacts to noise and traffic during construction, relative to the revised project.

### **5.3 Alternative 3**

Alternative 3 would relocate the northern riser poles adjacent to and north of Limonite Avenue approximately 0.25 miles north-northwest to a location adjacent to Interstate 15, but otherwise follow the same alignment as the revised project.

Alternative 3 would reduce, but not avoid, the impact on visual quality. Other impacts would be similar to those of the revised project.

### **5.4 Alternative 4**

The Wineville-Landon Underground Alternative (Alternative 4) would begin and transition to underground immediately adjacent to the tie-in to the Mira Loma-Vista #1 230 kV transmission line and travel south within Wineville Avenue for approximately 0.4 miles, at which point it would turn west to continue underground within Landon Drive for approximately 0.4 mile. At the end of Landon Drive, the line would transition to an overhead position and follow the same overhead and underground alignment as the revised project.

As with Alternative 3, Alternative 4 would reduce, but not avoid, the impact on visual quality and other impacts would be similar to those of the revised project.

### **5.5 No Project Alternative**

Under the No Project Alternative, the RTRP would not be constructed and none of the project objectives would be met. In the absence of the RTRP, it is likely that the Riverside Public Utility would opt to increase gas-fired generation and install battery storage to mitigate the system impact from potential failure of its transformers at Vista Substation or from failure of its interconnection to Vista Substation. This would result in a significant and unavoidable impacts to air quality as compared to any other project alternative. It would not result in any other impacts.

### **6. Environmentally Superior Alternative**

Alternative 1 is the environmentally superior alternative. As with Alternative 2, Alternative 1 would reduce the RTRP's impacts on aesthetics and agricultural and forestry resources. It would also have fewer significant and unavoidable short-term construction-related impacts than Alternative 2.

### **7. Certification of SEIR**

Pursuant to CEQA Guidelines § 15090(a), prior to approving a project the lead agency shall certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information contained in the EIR prior to approving the project, and that the EIR reflects the lead agency's independent judgment and analysis.

The Commission's Energy Division issued and distributed an initial Notice of Preparation of an SEIR on January 25, 2017 and conducted a noticed public scoping meeting in Jurupa Valley on February 8, 2017. Two hundred and



forty-five persons attended the meeting, at which 41 persons provided oral comment. Three hundred and eleven written comments were also provided during the comment period, which ended on February 24, 2017.

In view of the passage of over 10 years since the RTRP was originally proposed and the five-fold increase in SCE's estimated project cost to \$234.5 million since that time, the Energy Division undertook to explore potential lower voltage project design alternatives that might feasibly meet the project's capacity and reliability objectives in a less environmentally adverse or costly manner than the proposed project. In order to facilitate Energy Division's undertaking, the Administrative Law Judge (ALJ) directed SCE and Riverside to meet and confer with the CAISO to explore lower voltage designs or other interim design remedies to the proposed project and to jointly report back to Energy Division on their findings.<sup>2</sup> The parties filed the report on January 12, 2018.

Energy Division issued the draft SEIR and distributed notices of its availability on April 2, 2018. The draft SEIR screened 30 project alternatives including 17 alternatives that might avoid the addition of a high-voltage transmission line and eliminated all but four alternatives for failing to meet the basic project objectives and feasibility criteria.

Energy Division conducted noticed public workshops in Jurupa Valley on April 24 and 25, 2018. One hundred and sixty-seven persons attended the workshops, at which 51 persons provided written comment. In addition, Energy Division received 278 comment letters during the comment period.

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<sup>2</sup> ALJ ruling, August 15, 2017.

The SEIR documents and responds to all written and oral comments made on the draft SEIR, as required by CEQA. As also required by CEQA, the SEIR examines the environmental impacts of the proposed projects and alternatives, including the No Project Alternative; it identifies their significant environmental impacts and the mitigation measures that will avoid or substantially lessen them, where feasible; and it identifies the environmentally superior alternative.

No party challenges the findings made in the SEIR or that it was prepared in compliance with CEQA.

We have reviewed and considered the information contained in the SEIR. We find that substantial evidence supports the SEIR's findings, and we certify that the EIR was completed in compliance with CEQA, that we have reviewed and considered the information contained in it, and that it reflects our independent judgment.

## **8. Infeasibility of Environmentally Superior Alternative**

CEQA provides that a permitting agency may not approve the project unless it requires all mitigation measures identified in the EIR, unless it finds them to be infeasible.<sup>3</sup> SCE challenges the feasibility of Alternative 1 (and similarly Alternatives 2 through 4), and Jurupa Valley challenges the feasibility of the revised project.

### **8.1 SCE's Infeasibility Claims**

SCE asserts that the environmentally superior Alternative 1 will cost \$521 million, which is \$113 million more than the already substantial cost of \$408 million for the revised proposed project. SCE argues that this incremental cost renders Alternative 1 infeasible because it accomplishes the same project

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<sup>3</sup> CEQA Guidelines § 15091(a)(3).

objectives as the revised project but at substantially higher cost and ratepayer expense, which is inconsistent with Commission policy that promotes affordable electrical utility service.<sup>4</sup> SCE notes that Alternative 1 only reduces impacts to aesthetics and agricultural resources; that the revised project's overhead alignment within Jurupa Valley primarily runs through currently undeveloped parcels along Interstate 15, a major six-lane divided highway; that the impact to agricultural resources might occur in any event if the property is developed in the future; and that the undergrounding is actively sought by private landowners and developers to maximize the value of their real estate portfolios. SCE argues, in light of these contextual and environmental facts, the Commission should not deviate from its policy promoting affordable electrical utility service.<sup>5</sup>

Regardless of the merits of SCE's cost estimates,<sup>6</sup> we reject this argument. As a general matter of course, all environmental mitigation measures have a cost. CEQA codifies a statewide policy that essentially deems the cost of environmental mitigation to be as reasonable and necessary as the cost of any other project component (unless the mitigation is economically infeasible). The

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<sup>4</sup> Public Advocates Office supports SCE's argument that the undergrounding alternatives are infeasible based on the Commission's policies on electric affordability. Public Advocates Office invokes the broad opposition to the Commission's approval, in Decision (D.) 15-12-053, of the City of Chino Hill's petition to modify D.09-12-044 approving the Tehachapi Renewable Transmission Project to underground the City's portion of the transmission line. (Public Advocates Office opening brief, at 14-17.) Regardless of the merits of that decision, the underlying facts are eminently distinguishable: Here, unlike in the Tehachapi matter, the EIR has identified the undergrounding alternative as the environmentally superior alternative.

<sup>5</sup> SCE presents similar cost estimates for Alternatives 2, 3 and 4, and extends this argument to those alternatives as well.

<sup>6</sup> Sky Development and Lesso challenge SCE's cost estimates and assert that the revised proposed project will cost \$452 million as compared to only \$439 million for Alternative 1. We address this debate in Section 9, below.

Commission's policy in favor of affordable electrical utility service does not render it economically infeasible to comply with CEQA.<sup>7</sup>

With respect to the asserted contextual and environmental facts, SCE offers no authority for its suggestion that the number or type of environmental impacts has any bearing on whether a mitigation measure or alternative is infeasible; to our understanding, CEQA holds all impact categories in equal regard.

Furthermore, as to SCE's implicit suggestion that the overhead alignment's location along Interstate 15 lessens the significance of its environmental impact, we have certified the SEIR as reflecting our best judgment and do not reject its determination that the revised project's impact on visual resources is significant. Finally, we know of no legal authority and SCE offers none that would allow us to find a mitigation measure or alternative to be infeasible on the basis that it serves the financial interests of private landowners and developers.

SCE also argues that the environmentally superior undergrounding alternatives are infeasible because they incur the "known risk" that Jurupa Valley might compel the relocation of underground project facilities which could result in untold costs. Jurupa Valley counters that, under their franchise agreement, SCE does not have to pay for rights-of-way acquisition costs for undergrounding and that SCE does not require a superior easement to prevent Jurupa Valley from requiring the relocation of any underground transmission lines at SCE's expense because there is no conflict between undergrounding the

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<sup>7</sup> We note that the incremental cost of undergrounding may, under some circumstances, be so disproportional to the environmental impact that it seeks to mitigate as to render it economically infeasible. (*Compare* CEQA Guideline § 15126.4.) Nevertheless, SCE does not challenge the undergrounding alternatives for being economically infeasible (*see* SCE opening brief at 96) and, under the facts of this case, nor do we.

RTRP and any other existing or proposed underground facilities that would require the need for relocation in the first instance.

Nevertheless, Jurupa Valley does not assure us that it will never in the future propose underground facilities or other contingencies that would require the need to relocate the RTRP. We agree with SCE that the risk that Jurupa Valley might compel relocation of underground project facilities or exact a premium to grant SCE a superior easement protecting it against such risk warrants a finding that Alternative 1 (and the other undergrounding alternatives) are infeasible as a matter of policy and equity. The undergrounding alternatives were identified for the targeted purpose of mitigating visual impacts on Jurupa Valley's residential streets and Goose Creek Golf Club.<sup>8</sup> It would be patently inequitable to burden ratepayers with the cost of mitigating these impacts to Jurupa Valley only to have Jurupa Valley compel relocation or extract additional compensation in order for SCE to avoid that risk. However, Alternative 1 would not be infeasible if that risk is removed by Jurupa Valley granting SCE a superior easement that protects SCE against the risk that Jurupa Valley might compel the relocation of underground project facilities in consideration of the benefit that Alternative 1 would provide to Jurupa Valley.

## **8.2 Jurupa Valley's Infeasibility Claims**

Jurupa Valley presents several arguments asserting that the revised project is infeasible. We review these arguments because of the potential event that the environmentally superior Alternative 1 is rendered infeasible if Jurupa Valley does not grant SCE a superior easement, as discussed above.

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<sup>8</sup> See SEIR Section 4.1.

Jurupa Valley argues that the revised project is infeasible as a matter of environmental and social justice because the overhead facilities would be placed in and harm an area of Jurupa Valley that is a designated “Disadvantaged Community” under Senate Bill 535.<sup>9</sup> Jurupa Valley argues that the overhead facilities will subject the Disadvantaged Community to disproportionate environmental, economic and social burdens.

As Jurupa Valley points out, Gov. Code § 65040.12(e) defines environmental justice to mean “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies,” and the Attorney General’s Office further explains that “[f]airness in this context means that the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.” There is no evidence that the revised project or its overhead facilities placement are unfairly designed to be focused on Jurupa Valley’s or any other Disadvantaged Community. SCE and Riverside in their January 12, 2018, joint alternatives report, the EIR and the SEIR diligently analyzed potential line route alternatives

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<sup>9</sup> Senate Bill 535 (2012, de Leon) adds, among other things, Section 39711 to the Health and Safety Code to read:

“The California Environmental Protection Agency shall identify disadvantaged communities for investment opportunities related to this chapter. These communities shall be identified based on geographic, socioeconomic, public health, and environmental hazard criteria, and may include, but are not limited to, either of the following:

- (a) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation.
- (b) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment.”

and consistently confirmed that the selected route is likely to pose fewer impacts than dozens of other routing concepts. Approximately five miles of the revised project's overhead transmission line would be in other jurisdictions including undeveloped lands in Riverside itself and, conversely, some of the underground transmission facilities would be located within a census tract with poverty scores and other low-income indicators that are more severe than those where the route would be overhead adjacent to Interstate 15. Jurupa Valley's charge that the revised project violates environmental and social justice principles is without merit.

Jurupa Valley argues that the revised project is infeasible because the environmental impact of its overhead facilities will financially harm Jurupa Valley and its residents by removing over 830 jobs, damaging development opportunities along Interstate 15, deterring people from living, working and developing businesses in Jurupa Valley and depriving it of needed tax revenue to provide essential public services. Jurupa Valley argues that this financial harm would be socially and economically unjust to its disadvantaged residents. To the contrary, the route along Interstate 15 is currently vacant and, while the revised proposed project would make some property unavailable, the vast majority would remain open for development consistent with existing land use regulations. Furthermore, SCE presents compelling evidence of numerous examples of commercial, industrial and mixed-use developments near overhead transmission lines. The record does not support a finding that the revised project's financial impact on Jurupa Valley renders it infeasible under CEQA.

Jurupa Valley argues that the revised project is infeasible because it undermines the goals and policies of the Commission's Environmental and Social Justice Plan (ESJAP) by unfairly apportioning its adverse permanent

impacts on Jurupa Valley's Disadvantaged Communities and Environmental and Social Justice Communities. Specifically, Jurupa Valley argues that the revised project contradicts Goal 1, "Consistently integrate equity and access considerations throughout CPUC regulatory activities." To the contrary and as documented in the FEIR and SEIR, Riverside's and the Commission's CEQA review processes have furthered this goal by being open and inclusive to all potentially impacted communities consistent with the goal's objectives that the Commission consider the regulatory activity's impact on ESJ Communities and enhance communication channels so that equity issues are integrated into our efforts.

Jurupa Valley likewise argues that the revised project contradicts Goal 2, "Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health." To the contrary, the RTRP does not implicate the allocation of clean energy resource investment and is consistent with the goal's objective of prioritizing environmental and health benefits for ESJ communities because it would provide an interconnection to SCE's grid and clean, renewable generation sources and thereby reduce Riverside's reliance on its internal gas-fired generation with its attendant pollutants in the area.

Jurupa Valley likewise argues that the revised project contradicts Goal 6, "enhance enforcement to ensure safety and consumer protection for all, especially for ESJ communities." Jurupa Valley does not articulate any way in which the revised proposed project implicates or contradicts this goal, and none is apparent.

Jurupa Valley likewise argues that the revised project contradicts Goal 7, "Promote economic and workforce development opportunities in ESJ



communities.” As discussed previously, the record does not support a finding that the revised project would materially impact the potential for development and associated jobs along Interstate 15.

Jurupa Valley argues that the revised project is infeasible because its overhead facilities will create severe fire hazards. To the contrary, the EIR and the SEIR both conclude that fire-related impacts from the RTRP would be less than significant. As discussed previously, no party challenges the findings made in the SEIR or that it was prepared in compliance with CEQA.

Finally, Jurupa Valley argues that the revised project is infeasible because it is inconsistent with Jurupa Valley’s community values including economic and fiscal health, environmental justice, open space and visual quality, a small-town feel, and active outdoor life, and “being a Community of Communities that emphasizes the positive qualities that make Jurupa Valley’s communities unique and enhances Jurupa Valley’s ‘gateways’ to welcome residents and visitors.”<sup>10</sup> As discussed above, the record does not support a finding that the revised project would materially impact Jurupa Valley’s economic and fiscal health or conflict with environmental justice. We consider the revised proposed project’s unavoidable visual impacts that would interfere with Jurupa Valley’s community values of having unobstructed open space, a small-town feel and welcoming to its residents and visitors by weighing them against project need and other overriding considerations, below.

### **9. Overriding Considerations and Public Convenience and Necessity**

CEQA provides that a permitting agency may not approve a project that has unmitigable environmental impacts unless it determines that there are

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<sup>10</sup> Jurupa Valley opening brief, at 40.

overriding considerations that merit project approval despite those unmitigable environmental impacts.<sup>11</sup> Here, the need to provide Riverside with a second source line that includes enough capacity to accommodate Riverside's existing and projected load needs and that provides reliability in the event existing facilities serving Riverside are rendered inoperable, as well as the project benefits of making the Riverside Energy Resource Center generation units available for California Independent System Operator (CAISO) market dispatch to support system reliability, flexibility and efficiency and reducing the need for non-consequential load shedding within Riverside, are overriding considerations that serve the public convenience and necessity and outweigh the project's unavoidable impacts on aesthetics, agricultural and forestry resources, noise and transportation and traffic, and its significant contribution to cumulative hydrology and water quality impacts.

Riverside is served by 69 kV subtransmission lines from Vista Substation, which is its single point of interconnection to the CAISO-controlled grid. No other similarly sized load-serving entity has a single point of interconnection at this low voltage level of service.<sup>12</sup> The transformers serving Riverside have a nameplate capacity of 560 megawatt (MW). Riverside's system peak load has exceeded that capacity under normal operating conditions every year since 2006, except for 2008 during the economic recession, and Riverside's forecast shows that its system peak load will continue to increase over the next 20 years.

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<sup>11</sup> CEQA Guidelines § 15093.

<sup>12</sup> Of the 56 load-serving entities in California, 11 (including Riverside) have between 200 MW and 3,000 MW of peak load demand. Of these, only Riverside, Anaheim Public Utilities (APU) and Pasadena Water and Power (PWP) have a single interconnection point. Unlike Riverside, APU and PWP are served at the 230 kV transmission level.

Riverside has already experienced significant outages of the Vista Substation C bus in 2005 and 2007.

SCE's Wholesale Distribution Access Tariff requires it to plan, construct, operate and maintain its distribution system to meet the projected load needs of its wholesale customers at a level of service comparable to that which SCE provides to meet its own customers' requirements. SCE's Transmission Owner tariff, the Transmission Control Agreement between SCE and CAISO, and CAISO's Open Access Transmission Tariff require SCE to interconnect its system to the wholesale load of third parties in a non-discriminatory manner. The RTRP accomplishes these requirements.

Public Advocates Office argues that the Commission should rely on the California Energy Commission's (CEC) Integrated Energy Policy Report (IEPR) demand forecast for 2018 through 2030, which predicts that Riverside will encounter an average annual decrease of 0.33 percent in its system peak load. To the contrary, the CEC forecast is inappropriate for purposes of planning for Riverside's needs. The CEC forecast predicts the local area's coincident demand at the time of the system-wide peak. However, when planning for a radially configured local area like Riverside, the relevant inquiry is into the local area's non-coincident peak demand.<sup>13</sup>

Public Advocates Office asserts that there is only a 2 percent difference between the time of Riverside's peak demand and SCE's peak demand at Vista Substation and argues that it is *de minimis* and should not invalidate the use of the CEC forecast for this purpose. This comparison is unreliable because Vista Substation serves not only Riverside, but also SCE retail customers and the City

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<sup>13</sup> See, e.g., D.18-08-026 at 29-30.

of Colton. It does not overcome the evidence that Riverside's actual non-coincident peak has been consistently higher than the coincident peak and, over the past four years, the CEC's IEPR forecasts have under-predicted Riverside peak demand by anywhere from 59 MW to 102 MW.<sup>14</sup>

Public Advocates Office argues that Riverside's forecast is unreliable because it is crudely based on past growth trends. To the contrary, Riverside's forecast is based on a rigorous methodology statistically calibrated to 15 years of monthly non-coincident system peaks using, as input variables, local area per-capita personal income metrics for the Riverside-San Bernardino-Ontario Metropolitan Service Area, measured monthly weather effects, seasonal parameters before and after distribution system upgrades were made, transient industrial load gains and losses in the 2011-2014 time period and the combined impacts of avoided energy efficiency (EE) and photovoltaic (PV) - distributed generation (DG) loads and incremental electric vehicle (EV) loads on its system peaks. Furthermore, CEC staff reviewed Riverside's load forecast and found it to be reasonable for purposes of long-term planning, and the CEC affirmed the staff's findings when it approved Riverside's 2018 Integrated Resource Plan.

Public Advocates Office argues that Riverside's forecast is unreliable because it fails to incorporate additionally achievable energy efficiency requirements, specifically the California Code of Regulations, Title 24 Residential Building Standards requiring PV systems for all new homes. To the contrary, it

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<sup>14</sup> Riverside asks that we take official notice of an August 28, 2019, e-mail exchange between Mr. Cary Garcia of the CEC and Dr. Scott Lesch of Riverside in which Mr. Garcia states that the coincidence factor that the CEC used for Riverside in the 2019 Mid-load, No AAEE baseline forecasts is 0.943. (Riverside reply brief, at 12 and fn. 50.) The request is denied because neither the email nor the fact stated in it is a matter that must or may be judicially noticed under Evidence Code 451 or 452.

is not reasonable to expect these standards to materially reduce load because Riverside has not experienced any significant new housing development for nearly 10 years due to a lack of vacant parcels suitable for large developments.

Citing at A-54 of Exhibit RIV-1, Appendix A (“Riverside Load Forecasting Methodology/Models/Assumptions”), Public Advocates Office argues that Riverside’s forecast is unreliable because it over-projects the impact of EV charging by assuming that EV load growth will offset load reductions from PV and EE.<sup>15</sup> Riverside counters that the statement to which Public Advocates Office cites simply means that all forecasted net peak impacts are added together as a single input variable before being incorporated into the forecasting equation.<sup>16</sup> Taken together with the sentence that follows it, this statement might be read either way.<sup>17</sup> That said, in reviewing the complete discussion in the document regarding Riverside’s methodology for estimating the impacts of EE, PV and EV,<sup>18</sup> and taken together with the CEC’s approval of Riverside’s 2018 Integrated Resource Plan, we are not persuaded by Public Advocates Office’s interpretation or argument.

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<sup>15</sup> Public Advocates Office opening brief at 14.

<sup>16</sup> Riverside reply brief at 9-10. Riverside also argues that Public Advocates Office’s argument is false and misleading in violation of Rule 1.1 because Riverside provided discovery to Public Advocates Office showing that, in August 2030, Riverside’s peak load forecasting subtracts off 105.9 MW of load due to increased PV and EE load and adds back just 1.6 MW of load due to EV. (*Id.*)

<sup>17</sup> Ex. RIV-1, A-57. (“Note that for forecasting purposes, these incremental EV loads (above the 2015 baseline level) are treated as net load additions that effectively offset future EE and DG.PV (solar) load losses. Additionally, we assume that 75% of these net load gains will show up in our Residential customer class, with the remaining 25% spread evenly across our Commercial and Industrial classes.” Emphasis added; the emphasized phrase might be read as referring to EV load gains net of EE and PV load losses, or it might be read as referring to EV load gains above the 2015 levels.)

<sup>18</sup> See Ex. RIV-1, A-52 through A-57.

Public Advocates Office argues that Riverside does not require additional delivery capacity because it has 228 MVA of generation capacity that, taken together with Vista Substation's 557 MVA, affords Riverside a total capacity of 785 MVA (and a total capacity of 737 MVA if its largest generation unit of 48 MVA is out of service), which is more than necessary to service its load for the foreseeable future. This assertion ignores the record evidence that Riverside's internal generation does not meet SCE's local planning criterion that local dispatchable generation has been on-line for at least 90 percent of the time during the local area's summer peak hours. Riverside's internal generation does not meet that benchmark because, among other things, it is peaking, natural gas-fired generation that is not designed or available to operate for an extended number of hours, it operates within the constraints of air permit requirements, and it has experienced maintenance outages and communication failures. The availability of these resources to meet Riverside's peak load is further limited because they are often called upon to meet broader CAISO system needs.

Public Advocates Office argues that, given the escalating weight of SCE's Transmission Revenue Requirement (TRR) to which RTRP would add about \$65 million per year in revenue to be collected from ratepayers, most of whom are outside of Riverside's service area, the Commission should reject this application until Riverside demonstrates that it has investigated all technically feasible and environmentally compliant internal resource solutions. In particular, Public Advocates Office argues that reliability benefits similar to those provided by the RTRP could be achieved by system-based approaches including (1) transferring some of Riverside's load to SCE's San Bernardino system during a contingency event, (2) splitting some of the load within individual Riverside substations to increase the amount that could be transferred up to the thermal

limit, (3) paralleling three transformer banks at Vista Substation to offset an N-1 loss of one transformer and installing series reactors to offset short circuit duty issues, and (4) combining parallel transformer banks at Vista Substation with transferring some of Riverside's load to the San Bernardino system. To the contrary, SCE and Riverside presented overwhelming and persuasive evidence that these alternatives are infeasible, unsafe or fail to meet system needs.

Furthermore, as discussed above in Section 7, the SEIR assessed 30 project alternatives including 17 alternatives that might avoid the addition of a high-voltage transmission line by using various combinations of the elements contained in Public Advocates Office's low-voltage proposals. The SEIR eliminated those low-voltage alternatives for failing to meet the basic projects objectives and feasibility criteria. In any event, Public Advocates Office was on notice that the time and place to participate on the matter of project alternatives was through the CEQA review process that would culminate in the SEIR.<sup>19</sup> Indeed, Public Advocates Office (formerly the Office of Ratepayer Advocates) provided comments on the draft SEIR offering two proposed alternatives: (1) modifying Alternative 26, which the draft SEIR had eliminated from full evaluation, in a manner that Public Advocates Office asserted would allow it to meet feasibility criteria and (2) a bulk transmission alternative that would entail the construction of a new 500 kV substation.<sup>20</sup> The SEIR includes and responds to Public Advocates Office's comments and explains why its proposals are not feasible.<sup>21</sup> Public Advocates Office does not challenge certification of the SEIR and its new proposals are untimely.

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<sup>19</sup> ALJ ruling, June 10, 2015.

<sup>20</sup> SEIR, Volume II, M-3.2-13 to M-3.2-18.

<sup>21</sup> SEIR, Volume II, M-3.2-19 to M-3.2-20.

## **10. Maximum Cost**

Pub. Util. Code § 1005.5(a) requires that, whenever the Commission issues a certificate authorizing an electrical or gas corporation to construct plant estimated to cost greater than \$50 million, it specifies a maximum cost determined to be reasonable and prudent for the facility. SCE presents substantial evidence that the revised project will cost up to \$408 million (2018 constant dollars) including a 15 percent contingency and Alternative 1 will cost up to \$521 million (2018 constant dollars) including contingencies. We adopt them as the maximum reasonable and prudent cost of the respective projects for purposes of Section 1005.5(a).

By specifying these maximum costs, the Commission does not waive our authority to review or challenge actual costs incurred for reasonableness and prudence at the Federal Energy Regulatory Commission (FERC). In furtherance of our interest in exercising this authority, we direct SCE to submit, pursuant to GO 96-B, quarterly information-only submittals to Energy Division reporting on the status of project development and spending.

In addition, we remind SCE that it is required pursuant to Section 1005.5(b) to apply to the Commission for a determination of the reasonableness of any costs in excess of the adopted maximum cost. We direct SCE to notify Energy Division if and when it reasonably anticipates that the project costs will exceed the maximum cost and, within three months thereafter, to apply to the Commission for a determination of the reasonableness of such excess costs.

Sky Country, joined by Lesso, argues that SCE grossly underestimates the cost of the real estate necessary to complete the overhead alignment north of Limonite Avenue for the revised project and, to different degrees, overestimates both the revised project's and Alternative 1's costs of undergrounding. With



Sky Country's adjustments, the revised project's maximum cost would be \$452.29 million as compared to \$438.5 million for Alternative 1.

As an initial matter, we recognize that Sky Country, joined by Lesso, seeks to show that Alternative 1 is less costly than the revised proposed project in order to counter SCE's argument that Alternative 1 is infeasible as a matter of Commission policy that promotes affordable electrical utility service. Sky Country and Lesso are developers and real estate owners who have a keen interest in the undergrounding alternative as it would maximize the value of their real estate portfolios. In contrast, SCE has no discernible reason to underestimate the cost of the revised proposed project or, for that matter, overestimate the cost of Alternative 1.<sup>22</sup> We weigh the evidence with these factors in mind.

With respect to the revised project's real estate costs, SCE's approach was to develop a presumed cost per acre using a blended average dollar amount of local land sales between 2015 and 2018 for residential, industrial, and commercial land in the vicinity of the RTRP. Sky Country and Lesso argue that this approach is inadequate because SCE will need to condemn the property necessary to complete the overhead alignment north of Limonite Avenue using eminent domain, which is governed by strict legal standards that will result in dramatically higher property valuation. Sky Country and Lesso point out that they are among the developers whose property would be taken for the revised proposed project and that they adamantly oppose it. SCE argues that the need for condemnation is speculative at this juncture and that, in any event, the high value that Sky Country and Lesso place on their properties' developmental

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<sup>22</sup> To the extent that SCE might benefit from increasing its plant, it would be in SCE's interest to support Alternative 1, which it does not.

potential is contradicted by its history of having benefitted from favorable zoning for decades and a willing lead agency since at least 2011 and yet remaining vacant and unimproved. Given these circumstances, we agree with SCE's approach and estimated real estate costs for the revised project.

With respect to the costs of undergrounding, Sky Country argues that SCE's reliance on the cost of the underground segment of its 500kV Tehachapi Renewable Transmission Project (TRTP) as the basis for its cost estimates for the RTRP is excessive and inappropriate because the costs are outdated and because the TRTP was groundbreaking and more complex than the RTRP.<sup>23</sup> To the contrary, the evidence shows that SCE adjusted the TRTP costs to appropriately account for material differences between the two projects' circumstances; as a result, SCE's estimated per-circuit mile construction cost for the underground sections of Alternative 1 (\$51.8 million) and the revised proposed project (\$65.9 million) are both considerably less than for the underground sections of the TRTP (\$98.3 million). On balance, we find SCE's estimates of project costs to be credible, reasonable and prudent.

In any event, our adoption of these maximum costs does not grant SCE free license to incur them. As stated previously, we intend to exercise our authority to review actual costs incurred for reasonableness and prudence and to challenge them as appropriate at FERC.

Finally, Public Advocates Office argues that the costs of the RTRP should be borne entirely by Riverside. We reject this argument because the issue of

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<sup>23</sup> Sky Country and Lesso also argue without evidence that SCE might be inappropriately double-counting or triple-counting estimated costs associated with known risks. This argument is speculative and we reject it.

allocation of RTRP costs is outside the scope of this proceeding and outside the Commission's jurisdiction pursuant to Pub. Util. Code § 9600(a)(2)(a).

#### **11. Compliance with EMF Policies**

The Commission has examined EMF impacts in several previous proceedings.<sup>24</sup> We found the scientific evidence presented in those proceedings was uncertain as to the possible health effects of EMFs and we did not find it appropriate to adopt any related numerical standards. Because there is no agreement among scientists that exposure to EMF creates any potential health risk, and because CEQA does not define or adopt any standards to address the potential health risk impacts of possible exposure to EMFs, the Commission does not consider magnetic fields in the context of CEQA and determination of environmental impacts.

However, recognizing that public concern remains, we do require, pursuant to GO 131 D, Section X.A, that all applications for authority to construct electric facilities over 50 kV include a description of the measures taken or proposed by the utility to reduce the potential for exposure to EMFs generated by the Proposed Project. We developed an interim policy that requires utilities, among other things, to identify the no cost measures undertaken, and the low cost measures implemented, to reduce the potential EMF impacts. The benchmark established for low cost measures is four percent of the total budgeted project cost that results in an EMF reduction of at least 15 percent (as measured at the edge of the utility right of way).

With respect to the RTRP, the project will use double-circuit construction that reduces spacing between circuits compared to single-circuit construction; it

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<sup>24</sup> See D.06-01-042 and D.93-11-013.

will arrange conductors and cables in a manner designed to reduce magnetic fields; it will raise the lowest conductor ground clearance from SCE design standard by 10 feet near residential, commercial/industrial or recreational areas where feasible; and it will place new substation electrical equipment away from the substation property lines closest to populated areas. It is uncontested that this design complies with the Commission's policies regarding incorporating no cost and low cost EMF reduction measures into electric facilities project design.

## **12. Comments on Proposed Decision**

The proposed decision of ALJ Yacknin in this matter was mailed to the parties on January 17, 2020, in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on February 6, 2020, by SCE, Riverside, the CAISO, Jurupa Valley, Sky Country, Lesso and Public Advocates Office, and reply comments were filed on February 11, 2020, by SCE, Riverside, Jurupa Valley, Sky Country and Lesso.

SCE, Jurupa Valley, Sky Country and Lesso propose modifications to the proposed decision to clarify our intent with respect to the superior easement requirement; SCE also proposes that we adopt a negotiation process with deadlines for compliance with the superior easement requirement in order to ensure that project construction is not unreasonably delayed. We make some clarifying modifications and require the parties to promptly begin negotiations to establish a process that outlines the milestones required for timely compliance. SCE and Jurupa Valley have both committed to negotiate in good faith to meet the superior easement requirement and we expect them to do so. If the parties reach an impasse or if SCE or Jurupa Valley believes that the other is

unreasonably delaying the finalization of the easement, then they may petition to modify this decision in order to reopen the proceeding to resolve the dispute.<sup>25</sup>

SCE requests that we require the information-only status update submittals to Energy Division be made on a bi-annual basis as opposed to quarterly. We decline to make the change.

Public Advocates Office argues for the first time in its comments on the proposed decision that the SEIR fails to comply with CEQA because it does not consider air quality impacts that may result from making the Riverside Energy Resource Center generation units available to the CAISO for market dispatch. We reject this argument for being mere speculation that is refuted by the record and prejudicially late.

Public Advocates Office argues that the proposed decision legally errs in concluding that the issue of allocation of RTRP costs is outside the scope of the proceeding or the Commission's jurisdiction. The argument is without merit.

### **13. Assignment of Proceeding**

Liane M. Randolph is the assigned Commissioner and Hallie Yacknin is the assigned Administrative Law Judge in this proceeding.

### **Findings of Fact**

1. The revised project would have significant impacts on air quality and greenhouse gases, biological resources, cultural, tribal and paleontological resources, hazards and hazardous materials, hydrology and water quality, public services and utilities and recreation can be mitigated to a less-than-significant level with the mitigation measures identified in the MMRP contained in the final EIR and SEIR.

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<sup>25</sup> We remind the parties that they may request the Commission's alternative dispute resolution services once the proceeding is reopened.

2. The revised project would have significant and unavoidable impacts on aesthetics, agricultural and forestry resources, noise, and transportation and traffic, and a significant contribution to cumulative hydrology and water quality impacts:

- a. The 230 kV transmission line and the introduction of riser poles would significantly affect scenic vistas occurring along the Santa Ana River corridor including the Santa Ana River National Recreation Trail, portions of the Santa Ana River Regional Park, and the Hidden Valley Wildlife Area; in several residential neighborhoods in the City of Riverside; and from local roadways, parks, and recreational areas within the City of Jurupa Valley.
- b. The presence of overhead 230 kV transmission line poles and towers would permanently convert prime farmland, unique farmland and farmland of statewide importance to non-agricultural uses.
- c. Construction of the underground transmission line vaults and duct banks would substantially temporarily or periodically increase ambient noise levels in the vicinity.
- d. Temporary road and lane closures during construction would substantially temporarily conflict with the City of Jurupa Valley's and the City of Riverside's traffic management plans by reducing the level of service.
- e. Construction and operation of the 230 kV transmission line and Wildlife Substation would incrementally increase runoff, sedimentation, and pollutant concentrations that, when combined with past, present, and future projects, could contribute to water quality impacts for the watershed.

3. Alternative 1 would reduce the revised project's aesthetic impacts, avoid its impacts on agricultural and forestry resources, and have fewer short-term construction impacts than Alternative 2.

4. The environmentally superior alternative, other than the No Project Alternative, is Alternative 1.

5. Riverside is served by 69 kV subtransmission lines from Vista Substation, which is its single point of interconnection to the CAISO-controlled grid. No other similarly sized load-serving entity has a single point of interconnection at this low voltage level of service.

6. Riverside's system peak load has exceeded the 560 MW nameplate capacity of the transformers that serve it under normal operating conditions every year since 2006, except for 2008 during the economic recession, and Riverside's system peak load will continue to increase over the next 20 years.

7. The RTRP would meet SCE's obligations under its Wholesale Distribution Access Tariff to plan, construct, operate and maintain its distribution system to meet the projected load needs of its wholesale customers at a level of service comparable to that which SCE provides to meet its own customers' requirements and SCE's obligations under its Transmission Owner tariff, the Transmission Control Agreement between SCE and CAISO, and CAISO's Open Access Transmission Tariff to interconnect its system to the wholesale load of third parties in a non-discriminatory manner.

8. The RTRP would make the Riverside Energy Resource Center generation units available for CAISO market dispatch to support system reliability, flexibility and efficiency and reducing the need for non-consequential load shedding within Riverside.

9. The revised project will cost up to \$408 million including a 15 percent contingency.

10. Alternative 1 will cost up to \$521 million including contingencies.

### **Conclusions of Law**

1. The SEIR was completed in compliance with CEQA, and it reflects the Commission's independent judgment and analysis on all material matters.
2. The Commission's policy in favor of affordable electrical utility service does not render the project alternatives infeasible.
3. Unless the risk that Jurupa Valley might compel relocation of underground project facilities or exact additional compensation to grant SCE a superior easement protecting against such risk is removed in consideration of the benefit that Alternative 1 would provide to Jurupa Valley, the undergrounding project alternatives are infeasible as a matter of policy and equity.
4. The RTRP would serve the public convenience and necessity by providing Riverside with a second source line that includes enough capacity to accommodate Riverside's existing and projected load needs, by providing reliability in the event existing facilities serving Riverside are rendered inoperable, and by making the Riverside Energy Resource Center generation units available for CAISO market dispatch to support system reliability, flexibility and efficiency and reducing the need for non-consequential load shedding within Riverside.
5. The need to provide Riverside with a second source line that includes enough capacity to accommodate Riverside's existing and projected load needs and that provides reliability in the event existing facilities serving Riverside are rendered inoperable, as well as the project benefits of making the Riverside Energy Resource Center generation units available for CAISO market dispatch to support system reliability, flexibility and efficiency and reducing the need for non-consequential load shedding within Riverside, are overriding considerations that serve the public convenience and necessity and outweigh Alternative 1's



unavoidable impacts on aesthetics, noise and transportation and traffic, and its significant contribution to cumulative hydrology and water quality impacts.

6. The need to provide Riverside with a second source line that includes enough capacity to accommodate Riverside's existing and projected load needs and that provides reliability in the event existing facilities serving Riverside are rendered inoperable, as well as the project benefits of making the Riverside Energy Resource Center generation units available for CAISO market dispatch to support system reliability, flexibility and efficiency and reducing the need for non-consequential load shedding within Riverside, are overriding considerations that serve the public convenience and necessity and outweigh the revised proposed project's unavoidable impacts on aesthetics, agricultural and forestry resources, noise and transportation and traffic, and its significant contribution to cumulative hydrology and water quality impacts.

7. SCE's Field Management Plan and Supplemental Field Management Plan comport with the Commission's policies regarding the mitigation of EMF effects.

8. Provided that Jurupa Valley grants SCE a superior easement protecting against the mandatory relocation of underground project facilities in consideration of the undergrounding of those project facilities, SCE should be granted a CPCN to construct the RTRP as Alternative 1, in conformance with the MMRP for Alternative 1 contained in the final EIR and SEIR.

9. If Jurupa Valley does not grant SCE a superior easement protecting against the mandatory relocation of underground project facilities in consideration of the undergrounding of those project facilities, SCE should be granted a permit to construct the Riverside Transmission Reliability Project as the revised project, with the mitigation identified in the MMRP for the revised proposed project contained in the final EIR and SEIR.

10. The issue of allocation of RTRP costs is outside the scope of this proceeding and outside the Commission's jurisdiction pursuant to Pub. Util. Code § 9600(a)(2)(a).

11. The design of the RTRP complies with the Commission's policies regarding incorporating no cost and low cost EMF reduction measures into electric facilities project design.

12. This decision should be effective today.

13. Application 15-04-013 should be closed.

### **O R D E R**

#### **IT IS ORDERED** that:

1. The Subsequent Environmental Impact Report for the Riverside Transmission Reliability Project is certified as having been completed in compliance with the California Environmental Quality Act, reviewed and considered by the California Public Utilities Commission (Commission) prior to approving the project, and reflective of the Commission's independent judgment and analysis.

2. Within 30 days of the date of this decision, Southern California Edison Company (SCE) and the City of Jurupa Valley (Jurupa Valley) shall begin good faith negotiations to establish a process that outlines the milestones required for Jurupa Valley to grant SCE a superior easement or other property right protecting against the mandatory relocation of the Riverside Transmission Reliability Project's underground project facilities in consideration of the undergrounding of those facilities.

3. Provided that the City of Jurupa Valley grants Southern California Edison Company (SCE) a superior easement or other property right protecting against the mandatory relocation of underground project facilities in consideration of the

undergrounding of those project facilities, SCE is granted a certificate of public convenience and necessity to construct the Riverside Transmission Reliability Project as Alternative 1, with the mitigation identified in the Mitigation Monitoring and Reporting Plan contained in the final environmental impact report and subsequent environmental impact report prepared for the project.

4. If the City of Jurupa Valley does not grant Southern California Edison Company (SCE) a superior easement or other property right protecting against the mandatory relocation of underground project facilities in consideration of the undergrounding of those project facilities, SCE is granted a certificate of public convenience and necessity to construct the Riverside Transmission Reliability Project as the revised proposed project, with the mitigation identified in the Mitigation Monitoring and Reporting Plan contained in the final environmental impact report and subsequent environmental impact report prepared for the project.

5. We adopt a cost cap for the Riverside Transmission Reliability Project of \$408 million if built as proposed by Southern California Edison Company and \$521 million if built as Alternative 1.

6. Southern California Edison Company shall notify the Commission's Energy Division if and when it reasonably anticipates that Riverside Transmission Reliability Project costs will exceed \$408 million if built as proposed by Southern California Edison Company and \$521 million if built as Alternative 1 and, within three months thereafter, to apply to the Commission for a determination of the reasonableness of such excess costs pursuant to Public Utilities Code § 1005.5(b).

7. Southern California Edison Company (SCE) shall make quarterly information-only submittals to the Commission's Energy Division providing

status updates on the Riverside Transmission Reliability Project (RTRP). These status updates shall include, at minimum:

- (a) Comprehensive project development schedule (with data organized by month), including estimated project in-service date;
- (b) Any changes in project scope and schedule, including the reasons for such changes;
- (c) Any engineering difficulties encountered in constructing the project;
- (d) Total estimated project costs;
- (e) Actual spending to date;
- (f) Any and all filings submitted to the Federal Energy Regulatory Commission for ultimate cost recovery through transmission rates; and
- (g) Any additional information SCE believes relevant and necessary to accurately convey the status of the RTRP.

8. Energy Division may approve requests by Southern California Edison Company (SCE) for minor project refinements that may be necessary due to final engineering of the Riverside Transmission Reliability Project so long as such minor project refinements are located within the geographic boundary of the study area of the Environmental Impact Report and Subsequent Environmental Impact Report and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the environmental document; conflict with any mitigation measure or applicable law or policy; or trigger an additional permit requirement. SCE shall seek any other project refinements by a petition to modify this decision.

9. Application 15-04-013 is closed.

This order is effective today.

Dated March 12, 2020, at Sacramento, California.

MARYBEL BATJER

President

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

Commissioners

# EXHIBIT B

## 9 MITIGATION MONITORING AND REPORTING PLAN

### 9 MITIGATION MONITORING AND REPORTING PLAN

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#### 9.1 INTRODUCTION

The MMRP for the Revised Project or alternative establishes the approach to implementing the mitigation measures and EPEs identified in the Subsequent EIR. SCE, as the Applicant and project proponent, would be responsible for implementing all applicable measures, including the adopted mitigation measures and conditions of project approval, as well as conditions imposed in any permits or regulations administered by other responsible agencies. As the lead agency, the CPUC would be responsible for ensuring monitoring and reporting on required mitigation if the Revised Project or an alternative is approved.

If the Revised Project is approved and the MMRP described below is adopted by the CPUC, a detailed Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) would be developed, as described in Section 10.2 below. The MMCRP would be the mechanism for CPUC implementation of the MMRP.

The MMRP is presented in Table 9.6-1. The table is organized first by environmental topic (i.e., Aesthetics, Biological Resources, etc.) and subsequently by EPE or mitigation measure. Table 9.6-1 includes:

- EPEs and mitigation measures that SCE must implement as part of the Revised Project or any approved alternative
- Monitoring and reporting requirements
- Effectiveness criteria
- Timing and location of implementation for each measure

The MMCRP would be the basis for the CPUC's environmental monitoring and reporting activities throughout project construction, including during site rehabilitation and restoration after construction is completed. The MMCRP would identify how and when the mitigation measures would be implemented. The MMCRP would also identify duties and responsibilities of the various parties, communication protocols to follow, and record management requirements. The MMCRP would be prepared and instituted prior to the CPUC issuing any notices to proceed, or the initiation of any construction.

## 9 MITIGATION MONITORING AND REPORTING PLAN

### 9.2 AUTHORITY FOR THE MMCRP

#### 9.2.1 California Public Utilities Commission

The California Public Utilities Code confers authority upon the CPUC to regulate the terms of service, and the safety, practices, and equipment of utilities subject to its jurisdiction. It is CPUC practice, pursuant to its statutory responsibility, to protect the environment, and to require that mitigation measures stipulated as conditions of approval be properly implemented, monitored, and reported on. This requirement is codified statewide as PRC § 21081.6, which requires a public agency to adopt a mitigation monitoring or reporting program, when it approves a project that is subject to preparation of an EIR, and where the EIR for the project identifies significant adverse environmental effects. CEQA Guidelines Section 15097 describes agency requirements for mitigation monitoring or reporting.

The CPUC would address its responsibilities under PRC § 21081.6 when it takes action on SCE's application for a Certificate of Public Convenience and Necessity. If the Commission approves the Revised Project or an alternative, it also would adopt an MMRP and include the mitigation measures as a condition of approval. The MMRP would be incorporated into the MMCRP.

The purpose of an MMCRP is to ensure that the measures adopted to mitigate or avoid significant impacts of a project are implemented, and to report on their implementation. The CPUC views the MMCRP as a working guide to facilitate implementation of mitigation measures imposed by the approving agencies, and any measures proposed by the project proponent, and to provide for the monitoring, compliance, and reporting activities of the CPUC and its designated monitors.

### 9.3 ORGANIZATION OF THE MMCRP

If the Revised Project or an alternative is approved, the CPUC would compile the Final MMRP and include it in the Final Subsequent EIR, as adopted. Based on the MMRP, the MMCRP would be prepared and would serve as a self-contained guide for implementing the MMRP throughout project construction, and during site rehabilitation and restoration after construction is completed.

The Final MMCRP would contain a concise overview and description of the approved project, outline its physical locations and geographic limits, and, to the extent known, provide the project schedule. It would include all adopted mitigation measures, and would specify the master reference document(s) that the monitors and SCE would use in carrying out the MMRP (e.g., the Final Subsequent EIR, detailed working maps and plans, issued permits, etc.). The EPEs SCE has committed to implement would be incorporated to the extent they have not been superseded by specific mitigation measures in the Subsequent EIR.

The MMCRP would include a list of the agencies having jurisdiction over various aspects of the project, and a description of where these respective jurisdictions occur. For example, the MMCRP would state which CDFW regional office has jurisdiction and provide contact

## 9 MITIGATION MONITORING AND REPORTING PLAN

information, including the designated representative's name, address, email, telephone and fax numbers.

The MMCRP would also define the way SCE's monitoring team would interact with CPUC staff and consultants. In addition, the MMCRP would define SCE's required submittals to the agencies, and protocol for interactions among agency and SCE team members.

The MMCRP would be structured as follows:

1. Introduction
  - a. Authority and Purpose of the MMCRP
  - b. Jurisdictional Agencies
  - c. Project Description
  - d. Organization of the MMCRP
2. Roles and Responsibilities
  - a. Monitoring Responsibility
  - b. Enforcement Responsibility
  - c. Mitigation Compliance Responsibility
  - d. Communications
  - e. Dispute Resolution
  - f. SCE Roles
    - i. Identification of the qualified SCE team members who would verify that all adopted measures and conditions have been successfully implemented
    - ii. Organization of the SCE team, including specifying duties, roles, and responsibilities
    - iii. Identification of primary SCE contacts for CPUC environmental monitoring staff liaison
    - iv. General Monitoring and Compliance Procedures
  - g. Environmental Monitors
  - h. Construction Personnel
  - i. General Reporting Requirements
    - i. SCE Compliance Levels for internal reporting
    - ii. SCE Incident Summary format and protocol
    - iii. SCE Weekly Monitoring Report format and content
    - iv. SCE Annual Monitoring Report format and content
  - j. Records Management and Public Access to Records
3. Mitigation Measure Tables



## 9 MITIGATION MONITORING AND REPORTING PLAN

### 9.4 ROLES AND RESPONSIBILITIES

Responsibility for implementing the adopted measures rests with SCE, unless otherwise specified in the measure.

As lead agency under CEQA, the CPUC is responsible for monitoring an approved project to ensure that required mitigation measures and EPEs are implemented. The required MMRP would be implemented through the MMCRP. The purpose of the MMRP is to document that the mitigation measures required by the CPUC are implemented, and that mitigated environmental impacts are reduced to the level identified in the Subsequent EIR.

The CPUC may delegate duties and responsibilities for monitoring to environmental monitors or consultants working on behalf of the CPUC. Some monitoring responsibilities may be assumed by responsible agencies, where areas or resources under their jurisdiction are potentially affected or involved.

SCE would deploy its own monitors for its own purposes, to ensure implementation of its commitments and execution of its responsibilities. The number of SCE construction monitors assigned to the project would be determined by the utility, and would depend on the number of concurrent construction activities underway, their locations, and the types of resources potentially affected. The CPUC would ensure that persons assigned monitoring duties by SCE are qualified to undertake those duties.

When a mitigation measure requires that a study or plan be developed during the design or pre-construction phase of the project, SCE must submit the final study or plan to CPUC for review and approval. At least 60 days must be allowed for adequate review for any study or plan that requires approval of the CPUC, unless noted otherwise in the mitigation measure. Other agencies and jurisdictions with authority over aspects of the Revised Project or particular resources may require additional review time. The CPUC environmental monitoring team would be responsible for confirming that appropriate agency reviews have occurred, and required approvals were obtained by SCE.

During construction, circumstances may arise that require deviations from the project as approved. The CPUC, along with their environmental monitors, would evaluate any proposed deviations from the approved project to ensure they are consistent with CEQA requirements. Depending on its nature, a requested deviation would be processed as a Temporary Extra Work Space (TEWS), Minor Project Refinement (MPR), or be the subject of a Petition for Modification (PFM) submitted by the Applicant.

TEWS are requests for extra work space for a period of no more than 60 days. The work space must be located in a preexisting developed space with no sensitive resources or land uses on site, or within proximity of the proposed work space. Use of the TEWS would not result in any new significant environmental impacts.

## 9 MITIGATION MONITORING AND REPORTING PLAN

MPRs would be strictly limited to minor project changes that do not trigger additional permit requirements, do not increase the severity of an impact or create a new impact, and are within the geographic scope of the EIR.

If a project change would create, or have the potential to create, a new significant impact, increase the severity of an impact, or occur outside the geographic area evaluated in the EIR, SCE would be required to submit a PFM. The CPUC would evaluate the PFM under CEQA, as appropriate, to determine what form of supplemental environmental review would be required.

### 9.4.1 Enforcement Responsibility

The CPUC would be responsible for monitoring implementation of the MMCRP and enforcing the procedures adopted. Generally, this would be done through the environmental monitors assigned by the permitting agencies. In addition, if the permitting agencies' environmental monitors note conditions or situations falling within the purview of other agencies, they may notify the appropriate agencies or individuals about any problems, and report these to the CPUC.

As the State's regulator of investor-owned utilities, CPUC has the authority to halt any construction, operation, or maintenance activity associated with the project if the activity is determined to be a deviation from the approved project, or the adopted mitigation measures.

### 9.4.2 Compliance Responsibility

SCE would be responsible for successfully implementing all the adopted mitigation measures in the MMCRP. The MMCRP would contain criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds may be established through the review and approval of specific plans required under mitigation measures. Other requirements may be stipulated by another agency with applicable jurisdiction during that agency's permitting process.

SCE would inform CPUC and the environmental monitors in writing of any mitigation measures that are not or cannot be successfully implemented, and provide alternative approaches for successful mitigation implementation. The CPUC, in coordination with their environmental monitors, would review the alternative approach to determine if it is adequate and whether an MPR or PFM would apply.

## 9 MITIGATION MONITORING AND REPORTING PLAN

### 9.5 DISPUTE RESOLUTION

It is expected that the Final MMCRP would greatly reduce or eliminate potential disputes. However, even with the best preparation, disputes may occur. In such an event, the following procedure would be observed:

- **Step 1.** Disputes and complaints (including those from the public) should be directed first to the CPUC Project Manager or designee, as appropriate, for resolution. The Project Manager or designee would attempt to resolve the dispute.
- **Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the approved project or adopted MMRP.

The following steps apply to the CPUC only:

- **Step 3.** If a dispute or complaint regarding the implementation or evaluation of the MMRP or the mitigation measures cannot be resolved informally, or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed expeditiously in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.
- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, they may appeal it to the Commission via a procedure to be specified by the Commission.

Parties may also seek review by the Commission through existing procedures specified in the Commission's Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should be made to use the foregoing procedure first.

### 9.6 GENERAL MONITORING PROCEDURES

#### 9.6.1 Environmental Monitors

Many of the monitoring procedures would be conducted during the construction phase of the project. The CPUC and environmental monitors are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with SCE. To oversee the monitoring procedures and to ensure success, the environmental monitors assigned must be onsite during any construction activity for which mitigation is required. The environmental monitors are responsible for ensuring that all procedures specified in the MMCRP are followed.

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### 9.6.2 Construction Personnel

A key element in the success of mitigation and mitigation monitoring is the full cooperation of construction personnel and supervisors. Successful implementation of many of the mitigation measures requires specific actions and behaviors on the part of the construction supervisors or crews. To ensure success, the following actions, detailed in specific mitigation measures included in the MMCRP, would be taken:

- Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SCE. Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel would be asked to sign, denoting consent to the procedures.
- As specified by mitigation, a SEAP would be conducted to inform and train construction personnel about the requirements of the monitoring program (as detailed in the MMCRP). The CPUC environmental monitors would verify that each crew member receives the required training.
- A written summary of mitigation monitoring procedures would be provided to construction supervisors for all mitigation measures requiring their attention.

### 9.6.3 Reporting Procedures

Detailed weekly reports would be prepared and submitted by the CPUC environmental monitoring team. These would include detailed information on construction activities, compliance activities observed by the environmental monitors and others documented by SCE, any issues and their resolution, and photographs of relevant activities and conditions.

SCE is required to have its own monitors for particular resources, depending on project needs and activities. These monitors provide daily reports/surveys that are entered into SCE's field record environmental database (FRED) system. It is assumed that FRED or a similar database would be employed on this project. CPUC environmental monitors would have access to the reports. Construction is not allowed to start in a particular area until the required pre-construction surveys and flagging/staking are completed per the MMCRP, and the CPUC environmental monitor has validated compliance, and the CPUC has issued a Notice to Proceed.

SCE is required to provide the CPUC with written weekly and annual reports of the project, which shall include progress of construction, resulting impacts, mitigation implemented, and all other noteworthy elements of the project.

### 9.6.4 Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports would be made available for public inspection by the CPUC on request. The CPUC and SCE would develop a filing and tracking system. For additional

## 9 MITIGATION MONITORING AND REPORTING PLAN

information on mitigation monitoring and reporting for the project, the Energy Division of the CPUC would maintain an Internet website, accessible at:

<http://www.cpuc.ca.gov/Environment/info/panoramaenv/RTRP/index.html>

To facilitate the public's awareness, the CPUC would make weekly reports available on the website.

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Table 9.6-1 Mitigation Monitoring and Reporting Plan

EPE/Mitigation Measure	Performance Standard and Timing	Location
<p><b>Aesthetics</b></p> <p><b>EPE AES-06: Placement of Transmission Structures.</b> Transmission structures will be located adjacent to or in proximity of existing electrical infrastructure.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Locate transmission lines adjacent to existing electrical infrastructure</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>230.kV Transmission Line, 69.kV Subtransmission Lines, Fiber Optic Telecommunications</p>
<p><b>EPE AES-07: Storage Area Vegetation.</b> Rehabilitate pulling, tensioning, and construction storage areas to original contour and vegetative state.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> N/A</li> <li>• <b>Following Construction:</b> Return pulling, tensioning and construction storage areas to original state</li> </ul>	<p>230.kV Transmission Line, 69.kV Subtransmission Lines, Fiber Optic Telecommunications</p>
<p><b>EPE AES-09: Staging Areas.</b> Staging areas will be kept organized, and litter and debris will be regularly removed on at least a weekly basis.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> Staging areas will be kept clean and organized</li> <li>• <b>During Construction:</b> Staging areas will be kept clean and organized</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>230.kV Transmission Line, 69.kV Subtransmission Lines, Wildlife &amp; Wilderness Substations, Substation Upgrades, Fiber Optic Telecommunications</p>
<p><b>MM AES-01: Restore Construction Impacts to Vegetation.</b> SCE shall conduct a pre-construction site assessment of all locations where Revised Project construction activities have the potential to disturb existing vegetation, including existing native and landscaped vegetation. The pre-construction site assessment and proposed revegetation activities shall be documented in a Pre-Activity Study Report and shall include the following:</p> <ul style="list-style-type: none"> <li>• Description of work location, size, equipment, and methods required for project activities that may disturb vegetation</li> <li>• Map of work area location</li> <li>• Documentation of surrounding land uses</li> <li>• Photographs of the area to be disturbed</li> <li>• Documentation of vegetation types, species, and quantity to be removed</li> <li>• Proposed landscape revegetation plans</li> <li>• Records of communication with landowners indicating approval of revegetation plans</li> </ul> <p>The Pre-Activity Study Report shall be submitted to CPUC for review and approval no fewer than 30 days prior to the start of construction.</p> <p>When Revised Project construction has been completed, all temporarily disturbed terrain will be restored, to the extent practical, to pre-construction conditions documented in the Pre-Activity Study Report while maintaining adequate safe work areas for operation and maintenance activities, as needed. <b>Re-vegetation Planting</b> will be used, where appropriate (e-<b>natural-appearing-vegetated</b> landscape and reduce potential visual contrast between disturbed areas and the surrounding landscape. <b>Temporarily disturbed agricultural lands shall be restored in accordance with MM AGR-01. Temporarily disturbed non-native vegetation shall be restored with native vegetation. Documentation of completed revegetation activities, including planting container stock or seeding, shall be submitted to the CPUC for final approval within no later than 30 days of after</b> project completion.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> SCE completes pre-construction site assessment and submits a Pre-Activity Study Report to CPUC for review and approval no fewer than 30 days prior to the start of construction</li> <li>• <b>During Construction:</b> N/A</li> <li>• <b>Following Construction:</b> Restore impacts on vegetation and provide documentation of completed revegetation to CPUC for final approval within 30 days of project completion</li> </ul>	<p>All Revised Project locations where <b>ecological</b> vegetation or landscaping has been disturbed by construction purposes</p>
<p><b>Agriculture and Forestry Resources</b></p> <p><b>EPE AGR-01: Minimize Impacts to Active Agricultural Operations.</b></p> <ul style="list-style-type: none"> <li>• Transmission structures would be located adjacent to existing electrical infrastructure to consolidate any potential obstructions to the movement of agricultural machinery</li> <li>• Access roads, spur roads, staging areas, and pulling/splicing sites would be located in areas that minimize impacts to agricultural operations</li> <li>• Removal of perennial crops would be minimized</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> Minimize impacts to active agricultural operations</li> <li>• <b>During Construction:</b> Minimize impacts to active agricultural operations</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Transmission Structures, Access Roads, Spur Roads, Staging Areas, Pulling/Splicing Sites</p>
<p><b>MM AGR-01: Restore Soils (from 2013 RTRP EIR)</b></p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> Separately stockpile surface and subsurface soil layers</li> </ul>	<p>All locations of Prime Farmland, Unique Farmland, and Farmland of</p>

9 MITIGATION MONITORING AND REPORTING PLAN

EPEZ/Mitigation Measure	Performance Standard and Timing	Location
<p>Restore soils to pre-project conditions:</p> <ul style="list-style-type: none"> <li>Replace soils in a manner that shall minimize negative impacts on crop productivity by stockpiling surface and subsurface layers separately and returning those layers to their pre-construction locations in the soil profile.</li> <li>The top soil layers shall be ripped to restore compacted soils to their original density. Ripping may also be used in areas where vehicle and equipment traffic have compacted the top soil layers.</li> </ul>	<ul style="list-style-type: none"> <li>During Construction: Protect stockpiled soils from erosion</li> <li>Following Construction: (1) Return stockpiled soil layers to their pre-construction locations in the soil profile, (2) Rip top soil layers</li> </ul>	<p>Staterwide Imporance impacted by the Proposed Project</p>
<p><b>MM AGR-03: Compensation of Farmland Impacts</b></p> <p>SCE shall compensate for the loss of farmland resulting from the construction of transmission infrastructure and establishment of permanent vegetation clearance areas around transmission structures. In addition, SCE shall participate in a land conservation program to create permanent conservation easements to preserve agricultural land within the City of Jurupa Valley, SCE's participation in the program shall comply with the following guidelines:</p> <ol style="list-style-type: none"> <li>SCE shall acquire farmland or pay fees into a conservation program to permanently preserve an appropriate quantity of land to fully mitigate Revised Project impacts. SCE shall permanently preserve agricultural land at a 1:1 ratio in the City of Jurupa Valley for permanent impacts of the Revised Project.</li> <li>If land conservation is not feasible within the City of Jurupa Valley, SCE shall inform the CPUC and identify comparable land preservation options within the County of Riverside.</li> <li>SCE shall conduct and submit to the CPUC the results of a pre-construction assessment to establish the land use of all impacted land and shall be responsible for mitigating important farmland within the City of Jurupa Valley that is permanently converted to another use by the project.</li> <li>SCE shall provide evidence of compensation prior to construction.</li> <li>Important farmland that has been converted to land uses or land use designations that preclude the agricultural use of the land would not require mitigation.</li> </ol>	<ul style="list-style-type: none"> <li>Prior to Construction: (1) Assess land use of impacted land, (2) acquire farmland or contribute to conservation program at 1:1 ratio, and (3) provide evidence of compensation to CPUC</li> <li>During Construction: N/A</li> <li>Following Construction: N/A</li> </ul>	<p>All locations of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance permanently impacted by the Revised Project.</p>
<p><b>Air Quality</b></p> <p><b>EPE AQ-01: Comply with SCAQMD Requirements.</b> The construction activities shall comply with the South Coast Air Quality Management District (SCAQMD) requirements, as applicable to the project.</p>	<ul style="list-style-type: none"> <li>Prior to Construction: N/A</li> <li>During Construction: Comply with SCAQMD requirements</li> <li>Following Construction: N/A</li> </ul>	<p>Active construction areas</p>
<p><b>EPE AQ-02: Worker Environmental Awareness Program.</b> A general Air Quality WEAP would be prepared. All construction crews and contractors would be required to participate in this WEAP training prior to starting work on the project. The air quality WEAP may be combined with the general WEAP for sensitive species as described under mitigation measure BIO-05.</p>	<ul style="list-style-type: none"> <li>Prior to Construction: Prepare a WEAP. All construction personnel receive training prior to construction.</li> <li>During Construction: All construction personnel receive training prior to entering active construction sites.</li> <li>Following Construction: N/A</li> </ul>	<p>Active construction areas</p>
<p><b>MM AQ-01: Fugitive Dust Control Plan (Incorporates 2013 RTPR EIR MMs AQ-07 thru AQ-13 and AQ-18).</b> Prior to start of the initial on-site construction, a draft Fugitive Dust Control Plan shall be prepared in compliance with SCAQMD Rule 403. Fugitive dust shall be controlled by the applicable best available control measures listed in Table 1 of Rule 403. A draft Fugitive Dust Control Plan shall be submitted to the CPUC for review and approval at least 30 days prior to the initiation of construction. Under SCAQMD Rule 403 – Fugitive Dust, the following provisions apply:</p> <ul style="list-style-type: none"> <li>The project applicant shall submit a Rule 403 Large Operation Notification to the Executive Officer.</li> <li>A sign shall be posted near the entrance of the facility with a responsible individual's name and phone number in case there are any fugitive dust control issues at the site.</li> <li>Appoint a construction relations officer to act as a community liaison concerning on-site construction activity, including resolution of issues related to PM<sub>10</sub> generation from combustion emissions and fugitive dust generation.</li> <li>An on-site supervisor with a current fugitive dust control class certification shall be present who is available within 30 minutes to respond to any fugitive dust control issue at the site during normal business hours.</li> <li>The operation shall keep on-site records of specific dust control actions taken.</li> </ul> <p>At a minimum, the Fugitive Dust Control Plan shall include the following control measures that must be implemented during construction:</p> <ul style="list-style-type: none"> <li>Limit vehicle speeds to 15 mph on unpaved surfaces.</li> </ul>	<ul style="list-style-type: none"> <li>Prior to Construction: (1) SCE submits the draft Fugitive Dust Control Plan to CPUC for review and approval at least 30 days prior to construction, (2) submit a Rule 403 Large Operation Notification to SCAQMD with copy provided to CPUC for verification</li> <li>During Construction: SCE implements the Fugitive Dust Control Plan</li> <li>Following Construction: N/A</li> </ul>	<p>All Proposed Project locations</p>

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EPE/Mitigation Measure

Performance Standard and Timing

Location

- Track-out shall not extend 25 feet or more from an active operation and track-out shall be removed at the conclusion of each workday. The contractor shall use a gravel apron, 25 feet long by road width, or a pipe-grid track-out control device to reduce mud/dirt track-out from active operations and unpaved truck exit routes.
  - The construction contractor shall use street sweepers (using reclaimed water) that comply with SCAQMD Rules 1186 and 1186.1.1. The street sweepers shall operate for the length of the truck route to and from unpaved construction areas including the material yards and in between construction sites.
  - A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the unpaved construction site.
  - Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour. When wind speeds are high enough to result in dust emissions crossing the work boundary, despite the application of dust mitigation measures, grading and earthmoving operations shall be suspended.
  - Visible dust plumes shall not occur during periods when soil is being disturbed by equipment or by wind at any time. If dust plumes are visible or a dust complaint is lodged, dust control may be achieved by applying water before/during earthwork and onto unpaved traffic areas, phasing work to limit dust, and setting up wind fences to limit wind-blown dust.
  - *Exposed Surfaces*
    - Water or a stabilizing agent shall be applied to exposed surfaces, including graded and disturbed areas, at least three times daily, preferably in the mid-morning, afternoon, and after work is finished for the day. Dust control shall be applied in sufficient quantity to prevent generation of dust plumes.
    - Soil stabilization shall be conducted at construction sites after normal working hours, on weekends, and holidays. This requirement also applies to inactive construction areas such as phased projects where disturbed land is left unattended. Applying water to form a visible crust on the soil and restricting vehicle access are often effective for short-term stabilization of disturbed surface areas. Long-term methods include applying dust suppressants and establishing vegetative cover. Stabilization best management practices used for disturbed areas not supporting construction traffic or active work may also include vegetation, plastic covering, erosion control fabrics and matting, and the early application of a gravel base on areas to be paved.
  - *Stock Piles*
    - On-site soil stock piles shall be covered or watered at least twice per day. Water excavated soil piles hourly or cover with temporary coverings. All storage piles shall be covered overnight and during inactivity.
  - *Haul Trucks*
    - Moist excavated soil prior to loading on haul trucks. Cover all loads of dirt leaving the site or leave at least two feet of freeboard capacity in haul truck to reduce fugitive dust emissions while in-route to disposal site.
- MM AQ-02: Exhaust Emissions Control (Incorporates 2013 RTP EIR MMs AQ-01 thru AQ-06, AQ-15 thru AQ-17, and AQ-19).**  
 Exhaust emissions from worker vehicles, construction equipment, and vehicles shall be minimized by implementing the following control measures:
- Use ultra-low sulfur diesel fuel (e.g., <15 ppm).
  - Use clean-burning on- and off-road diesel engines. Heavy-duty diesel-powered construction equipment manufactured after 1994 (with federally mandated "clean" diesel engines) shall be utilized.
  - SCE or its contractor shall develop a program and require construction workers to carpool to construction sites.
  - Restrict construction vehicle idling time to less than 5 minutes.
  - Properly maintain mechanical equipment.
  - Use particle traps and other appropriate controls to reduce diesel particulate matter. Other control equipment includes devices such as specialized catalytic converters (oxidation catalysts) control approximately 20 percent of diesel particulate matter, 40 percent of carbon monoxide, and 50 percent of hydrocarbon emissions.
  - ~~Provide temporary traffic controls, such as a flag person, during all phases of construction to maintain smooth traffic flow.~~
  - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

All Proposed Project Locations

- **Prior to Construction:** ~~N/A. SCE shall submit calculation evidence to the CPUC for review at least 2 weeks prior to use of off-road equipment that does not meet Tier 4 emissions standards, as needed.~~
- **During Construction:** (1) SCE implements all exhaust emission control measures; (2) Provide copies of documentation proving that construction equipment and vehicles meet USEPA-Certified ~~Tier-3~~ Tier 4 emissions standards ~~or higher, are outfitted with BACT devices, and comply with the Truck and Bus Regulation to the CPUC~~
- **Following Construction:** N/A as equipment is mobilized



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EPEZ/Mitigation Measure

Performance Standard and Timing

Location

- Define construction traffic routes to direct construction trucks away from congested streets or sensitive receptor areas.
- During Project construction, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards where available. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than that could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations (i.e., if Project construction goes beyond the anticipated schedule).

Alternatively, SCE or the contractor may be allowed to operate off-road equipment that does not meet Tier 4 emissions standards if SCE provides calculation evidence that use of the equipment will not cause an exceedance of SCAQMD significance thresholds. SCE must make a due diligence search to find and use equipment with the Tier 4 emissions standards or the highest emissions standards available. Circumstances where this may be applicable are limited to the following situations: (1) the equipment is specially or unique and cannot be found with a Tier 4 engine (e.g., sag cat with three winches, PM10 street sweepers); (2) the equipment is not in use for more than 5 days total; and/or (3) the equipment is registered under CARB's Statewide Portable Equipment Registration Program.

- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit, and Truck Regulation Upload, Compliance and Reporting System receipt shall be provided to the CPUC at the time of mobilization for each applicable unit of equipment.

**MM AQ-03: Overlap of Construction Activities (Incorporates 2013 RTP EIR MM AQ-14).** The final project construction schedule shall be coordinated to ensure that the Conductor installation activity shall not occur simultaneously with the TSP Foundation Installation and TSP Erection activities. Furthermore, air pollutant emissions generated during construction of SCE project components shall not overlap with construction of the RFP components of the RTP be calculated with those from construction of the RFP components of the RTP to determine which components can overlap without exceeding the peak daily SCAQMD significance thresholds. The final construction schedule and calculation evidence that the overlapping RTP components do not exceed SCAQMD significance thresholds shall be provided to the CPUC at least 2 weeks prior to construction.

**MM AQ-04: Limitation of Daily Construction Vehicles and Equipment Use (MM for Alternatives).** The following equipment limitations apply to the identified construction activities:

- Vault Installation
  - No more than 39 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 20 worker vehicles, in any one day
- Duct Bank Installation
  - No more than 34 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 20 worker vehicles, in any one day
- Underground Cable Installation
  - No more than 7 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 10 worker vehicles, in any one day
- Cable Terminating
  - No more than 5 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 8 worker vehicles, in any one day
- Cable Splicing
  - No more than 8 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, and 16 worker vehicles, in any one day
- Jack and Bore (trenchless)
  - No more than 12 vehicles/equipment may be operating on an active work site, including truck trips providing materials to and from the work site, in any one day

- **Prior to Construction:** SCE shall submit a final construction schedule to the CPUC for review at least two weeks prior to construction
- **During Construction:** SCE shall provide schedule updates throughout the construction process to ensure compliance with this mitigation measure
- **Following Construction:** N/A
- **Prior to Construction:** N/A. SCE shall submit calculation evidence to the CPUC for review at least 2 weeks prior to construction
- **During Construction:** Monitor the maximum number of vehicles and equipment used in any one day for five construction activities: Vault Installation, Duct Bank Installation, Underground Cable Installation, Cable Terminating, and Cable Splicing, and Jack and Bore
- **Following Construction:** N/A

Construction of Alternatives 1, 2, 3, and 4 in combination with the Proposed Project

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Biological Resources	EPZ/Mitigation Measure	Performance Standard and Timing	Location
<p><b>MM BIO-01: Habitat Conservation and MSHCP Compliance (from 2013 RTRP EIR).</b> The Project Proponent (RPU) shall pay the MSHCP fees in compliance with the MSHCP. Fees will be based on design footprint and confirmed by as-built data as available and applicable to confirm mitigation compliance and as negotiated with RCA for the public facility. The Proposed Project (responsibility of RPU and SCE) shall also comply with all other applicable MSHCP and SKRHCP requirements. The Proposed Project shall also implement the urban/wildlands interface requirements of the MSHCP for all areas adjacent to conservation areas.</p>	<p><b>Prior to Construction:</b> Engage the RCA to secure a consistency determination to obtain coverage for take under the MSHCP  <b>During Construction:</b> Comply with conditions and requirements of the MSHCP  <b>Following Construction:</b> Comply with conditions and requirements of the MSHCP</p>	<p>All Proposed Project locations</p>	
<p><b>MM BIO-01A: Verification of MSHCP Compliance.</b> SCE shall provide the CPUC with all documentation, studies, and plans submitted to the RCA by RPU (the MSHCP Permittee) as part of the permitting process to obtain coverage under the MSHCP. Such documentation shall include Development of a Biologically Equivalent or Superior Preservation Report for all riparian habitat impacts. Upon completion of the permitting process, SCE shall provide the CPUC with any conditions of approval or other requirements provided by the RCA. These conditions and requirements will be incorporated into the project Mitigation Monitoring, Compliance, and Reporting Plan.</p>	<p><b>Prior to Construction:</b> Provide CPUC with any documentation, studies, and plans submitted to the RCA  <b>During Construction:</b> Comply with conditions and requirements of the MSHCP  <b>Following Construction:</b> Comply with conditions and requirements of the MSHCP</p>	<p>All Revised Project locations</p>	
<p><b>MM BIO-02: Avian Protection on Power Lines (from 2013 RTRP EIR).</b> All transmission structures (TSPs and LSTs) would be designed to be avian-safe in accordance with "Suggested Practices for Raptor Protection on Power Lines: the State of the Art in 2004" (Avian Power Line Interaction Committee, 2006). This will include, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Conductors will be spaced to an acceptable distance of raptors such as red-tailed hawk and golden eagle to avoid potential electrocution risk;</li> <li>• Bus bars or other points of electrocution shall be covered with non-conductive caps;</li> <li>• Aerial span of the Santa Ana River will be marked with best available UV reflectors (bird diverters) every 100 feet and staggered along the conductors; and</li> <li>• Nest deterrents will be implemented.</li> </ul> <p>The Proposed Project shall implement APUC guidelines (current guidelines as of 2011). Designs for APUC compliance will be reviewed and approved by SCE, RPU and the Project Biologist (69-kV section will not include SCE approval).</p>	<p><b>Prior to Construction:</b> Design structures to be compliant with guidelines  <b>During Construction:</b> Construct project elements according to design  <b>Following Construction:</b> N/A</p>	<p>All TSPs and LSTs erected as part of Proposed Project</p>	
<p><b>MM BIO-09: Invasive Species Management (from 2013 RTRP EIR).</b> The project biologist would prepare measures to avoid or minimize the introduction of invasive plant, invertebrate, and vertebrate species into the project area during construction activities. Construction equipment being brought to the Project limits will be free of accumulated mud and debris. Equipment will be washed prior to project delivery to remove dirt from tracks, body, and attachments. Equipment with accumulated mud or debris will not be allowed to work within the project right-of-way until it is sufficiently clean (cleaning can be completed in a wash station at the laydown yard or offsite at another location not associated with the Project). Areas disturbed by construction will be maintained to control non-native invasive weed species and areas not designed to be bare for fire safety or have other soil stabilization (e.g., gravel, asphalt) will be revegetated and established to be less than 10-percent coverage by non-native weed species (goal will be to establish native cover equal or exceeding adjacent habitat) or have coverage of density and diversity equal to or exceeding 70 percent of adjacent native habitat. (It is expected that adjacent habitat may include non-native grassland. In these areas, the goal will be to establish cover consistent with adjacent areas, with an equal to or less than cover and density as found adjacent).</p>	<p><b>Prior to Construction:</b> Ensure all equipment and materials used in project construction are weed-free and free of eggs or adults of invasive species  <b>During Construction:</b> Maintain all equipment and project areas free of weeds and invasive pest species  <b>Following Construction:</b> Monitor disturbed areas to ensure that invasive weeds do not establish themselves</p>	<p>All Proposed Project locations</p>	
<p><b>MM BIO-09A: Weed Control Plan.</b> To support invasive species management, SCE shall prepare and implement a comprehensive Weed Control Plan for invasive, non-native species abatement. Developed land shall be excluded from weed control. The Weed Control Plan shall include specific weed abatement methods, practices, and treatment timing developed specifically for the Revised Project area by qualified individuals with at least 5 years of weed control experience within Riverside, Los Angeles, and San Bernardino Counties. The Weed Control Plan shall address control methods and issues controlling invasive non-native species within all vegetation communities and land cover types found along the Revised Project alignment in consultation with the Riverside County Agricultural Commissioner's Office and the California Invasive Plant Council (Cal-IPC). The Weed Control Plan shall be submitted to the CPUC for review and approval of at least 30 days prior to construction. The Weed Control Plan shall include the following:</p> <ul style="list-style-type: none"> <li>• A pre-construction weed inventory shall be conducted by surveying Revised Project work areas and areas immediately adjacent to Revised Project work areas for weed populations that are (1) considered by the Riverside County Agricultural Commissioner, the City of Riverside, or the City of Jurupa Valley as being a priority for control, and (2) weed populations</li> </ul>	<p><b>Prior to Construction:</b> SCE submits the Weed Control Plan to CPUC for review and approval at least 30 days prior to construction  <b>During Construction:</b> (1) SCE treats all weeds in accordance with the approved Weed Control Plan, (2) SCE prepares an annual weed inventory and monitoring report for submittal to CPUC  <b>Following Construction:</b> (1) SCE submits annual monitoring reports for 2 years after construction is complete, (2) SCE continues to treat all weeds in accordance with the approved Weed Control Plan, as necessary</p>	<p>All Revised Project locations</p>	

9 MITIGATION MONITORING AND REPORTING PLAN

EPE/Mitigation Measure

Performance Standard and Timing

Location

that are rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory (online Database [Cal-IPC 2006 [and 2007 update]; <http://www.cal-ipc.org/ip/inventory/index.php>]). These populations shall be mapped and described according to density and area covered. These plant species shall be treated prior to construction or at a time when treatments would be most effective based on phenology according to control methods and practices for invasive weed populations included in the Weed Control Plan designed in consultation with the Riverside County Agricultural Commissioner's Office and Cal-IPC, as appropriate.

- Weed control treatments shall include all legally permitted methods to be used in the following prioritized order: preventive, manual, mechanical, and chemical. The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Advisor (PCA) and implemented by a Licensed Qualified Applicator. Where manual and/or mechanical methods are used, disposal of the plant debris shall be within an approved landfill area within Riverside County. The timing of the weed control treatment shall be determined for each plant species in consultation with the PCA for the project, with the goal of controlling populations before they start producing seeds.
- From the time construction begins until 2 years after construction is complete, annual surveying for new invasive weed populations and the monitoring of identified and treated populations shall be required in the survey areas described above. The treatment of weeds shall occur on a minimum annual basis during this timeframe or until appropriate vegetative cover consistent with adjacent areas has been established.
- During project construction and operation/maintenance, all seeds and straw materials shall be certified weed free, and all gravel and fill material shall also be certified weed free by the Riverside County Agricultural Commissioner's Office.

**MM BIO-14: Delhi Sands Flower-Loving Fly Surveys and Mitigation.** SCE shall conduct Delhi sands flower loving fly (DSFLF) surveys in accordance with USFWS *Interim General Survey Guidelines for the Delhi Sands Flower-Loving Fly* (USFWS, 1996) within 12 months prior to construction within DSFLF suitable habitat. If the DSFLF habitat within the project site is determined to be occupied, 75 percent of the mapped Delhi Soils on site will be conserved. If it is determined that 75 percent conservation on the occupied site is infeasible or USFWS concurs that such conservation would not contribute to the long-term conservation of the species, conservation may occur within the conservation areas identified in Objective 1A at a ratio of three times (3:1) the mapped Delhi soils or, subject to USFWS concurrence, the habitat of the species as identified by survey biologist on the identified occupied site.

**MM BIO-15: Determination of a Biologically Equivalent or Superior Preservation.** SCE shall prepare a Determination of a Biologically Equivalent or Superior Preservation (DBESP) at least 90 days prior to construction within riparian habitat areas. The Determination of Biologically Equivalent or Superior Preservation will include quantification of unavoidable impacts to riparian/instream areas associated with the project, including direct and indirect effects; a written description of project design features and mitigation measures that reduce indirect effects, such as edge treatments, landscaping, elevation difference, minimization and/or compensation through restoration or enhancement; and a finding demonstrating that although the Proposed Project would not avoid impacts, with proposed design and compensation measures, the project would be biologically equivalent or superior to that which would occur under an avoidance alternative without these measures. In addition, prior to approval of Biologically Equivalent or Superior Preservation Determinations, the Wildlife Agencies will be notified and be provided a 60-day review and response period.

**Cultural, Tribal Cultural, and Paleontological Resources**

**EPE CUI-03: Evaluate Cultural Resources.** Evaluate the significance of all cultural resources that cannot be avoided. Evaluation studies would be conducted and documented as per applicable laws, regulations, and guidelines of the CRHR and NHRP.

**EPE CUI-02: Establish and Maintain a Protective Buffer Zone Around Each Recorded Cultural Resource Within or Immediately Adjacent to the ROW or Access and Spur Roads.** A protective buffer zone would be established around each recorded archaeological site and treated as an "environmentally sensitive area" within which construction activities and personnel would not be permitted, unless the archaeological site has been determined to be ineligible for the National Register of Historic Places (NRHP) and/or the California Register of Historical Resources (CRHR).

- **Prior to Construction:** Conduct DSFLF survey within 12 months prior to construction. If habitat is occupied, preserve soils on site or conduct off-site mitigation.

Within DSFLF mapped suitable habitat

- **Prior to Construction:** SCE submits the DBESP to agencies at least 90 days prior to construction in riparian areas; documentation of a DBESP approval must be received prior to impacts in riparian areas
- **During Construction:** SCE implements the measures in the DBESP
- **Following Construction:** SCE conducts annual monitoring and reporting as required in the approved DBESP

Temporary and permanent impacts on riparian habitat

- **Prior to Construction:** Evaluate and document significant cultural resources
- **During Construction:** Evaluate and document significant cultural resources
- **Following Construction:** N/A

Active construction areas

- **Prior to Construction:** Establish protective buffer zones around each recorded cultural resource
- **During Construction:** Establish protective buffer zones around each recorded cultural resource
- **Following Construction:** N/A

Active construction areas

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EPE/Mitigation Measure	Performance Standard and Timing	Location
<p><b>EPE CUL-03: Evaluate the Significance of all Cultural Resources that Cannot be Avoided.</b> Evaluation studies would be conducted and documented per applicable laws, regulation, and guidelines of the CRHR and NRHP.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> Evaluate and document significant cultural resources</li> <li>• <b>During Construction:</b> Evaluate and document significant cultural resources</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Active construction areas</p>
<p><b>EPE CUL-04: Minimize Impacts to Significant Cultural Resources that Have Not Yet Been Previously Evaluated and That Cannot be Avoided.</b> All ground-disturbing activities would be minimized within the bounds of unique archaeological sites, historical resources, or historic properties. Historical resources and unique archaeological resources where impacts cannot be reduced or minimized will be treated through the implementation of CUL-05. Minimization measures will include pre-construction identification of the most sensitive parts of sites and construction monitoring.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Minimize impacts to significant cultural resources. Implement the Construction Monitoring and Unanticipated Cultural Resources Discovery Plan.</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Active construction areas</p>
<p><b>EPE CUL-05: Construction Monitoring and Unanticipated Cultural Resources Discovery Plan.</b> Prior to construction, a Construction Monitoring and Unanticipated Cultural Resources Discovery Plan would be prepared. Resources identification and assessments for eligibility of the resources for listing in the CRHR will be consistent with the California Office of Historic Preservation Standards. The plan would detail procedures for avoidance and mitigative data recovery.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> Prepare a Construction Monitoring and Unanticipated Cultural Resources Discovery Plan</li> <li>• <b>During Construction:</b> N/A</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Active construction areas</p>
<p><b>MM CUL-02: Archaeological Monitoring (from 2013 RTRP EIR).</b> To avoid and/or minimize impacts to significant cultural resources, a qualified archaeologist will monitor ground-disturbing activities near previously identified cultural resources. If a newly identified cultural resource or an unknown component of a previously identified resource is discovered during construction, the monitor will follow the Unanticipated Discovery Plan identified in EPE CUL-05. The monitor will have the authority to stop or redirect work, as required to fulfill mitigation measure CUL-02. In addition, any human remains discovered during Project activities will be protected in accordance with current state law as detailed in California Health and Safety Code 7050.5 and California Public Resources Code Sections 5097.91 and 5097.98, as amended.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Ground disturbance near known cultural resources is monitored; Unanticipated Discovery Plan is implemented if needed; Procedures for discovery of human remains implemented per state law</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>All Proposed Project areas where ground disturbance occurs</p>
<p><b>MM CUL-02A: Tribal Resource Monitoring.</b> To avoid and/or minimize impacts on significant tribal cultural resources, a qualified archaeologist will monitor ground-disturbing activities near previously identified cultural resources. In addition, a qualified archaeologist will monitor all ground-disturbing activities along the Proposed Project alignment between Lucretia Avenue in Jurupa Valley and the Wildlife Substation. If a newly identified cultural resource or an unknown component of a previously identified resource is discovered during construction, the monitor will follow the Cultural Resources Monitoring and Treatment Plan (CRMTP) as defined in MM CUL-02B. The monitor will have the authority to stop or redirect work, as required to avoid and/or minimize impacts on tribal cultural resources.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Ground disturbance near (1) known cultural resources and (2) the Proposed Project alignment between Lucretia Avenue and Wildlife Substation is monitored; CRMTP is implemented if needed</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>All Proposed Project areas where ground disturbance occurs</p>
<p><b>MM CUL-02B: Cultural Resources Monitoring, Evaluation, and Treatment of Resources.</b> A Cultural Resources Monitoring and Treatment Plan (CRMTP) shall be combined with the Construction Monitoring and Unanticipated Cultural Resources Discovery Plan and shall be submitted at least 30 days prior to construction to consulting firm(s) for review, and the CPUC for review and approval. The following requirements/procedures shall be incorporated into the CRMTP:</p> <p><b>Qualifications and Responsibilities of Monitors</b></p> <ul style="list-style-type: none"> <li>• <i>Qualified Archaeologist.</i> SCE shall retain a qualified cultural resource professional (i.e., archaeologist) that meets the standards as specified in the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations [CFR] Part 61), approved by the CPUC, and has experience with California/regional history and local Native American history, traditions and customs. SCE shall provide the name and credentials of the Qualified Archaeologist to the CPUC for approval at least 14 days prior to construction. The Qualified Archaeologist shall be responsible for preparing the CRMTP, overseeing archaeological work, evaluating discoveries, and preparing Evaluation and Data Recovery Plans and subsequent reports. The Qualified Archaeologist shall be equipped to record, and when necessary, recover cultural resources. The Qualified Archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. The role of the Qualified Archaeologist shall be to oversee ground-disturbing activities at the project and off-site project improvement areas for the unearthing of previously unknown archaeological and/or cultural resources. No grading activities shall occur at the site or within the off-site project improvement areas until the Qualified Archaeologist has been approved by CPUC.</li> <li>• <i>Qualified Archaeological Monitors.</i> SCE shall retain qualified archaeological monitors (i.e., archaeological monitors) who have experience conducting cultural resource monitoring in the region on projects of similar size and approved by the CPUC. Qualified archaeological monitors shall work under the direction of the qualified archaeologist(s). A qualified archaeological monitor is defined as an individual who has a Bachelor's degree in anthropology, archaeology, historic</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> SCE submits a Discovery Plan and CRMTP to the CPUC at least 30 days prior to construction</li> <li>• <b>During Construction:</b> SCE implements the Discovery Plan and CRMTP including all monitor and discovery treatment requirements</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>All Proposed Project areas where ground disturbance occurs</p>

archaeology, or a related field and possesses a minimum of 4 months of supervised field and analytic experience in the archaeology of Southern California. SCE shall provide the name and credentials of proposed archaeological monitors to the CPUC for approval at least 14 days prior to construction. The role of the archaeological monitor(s) shall be to monitor the initial ground-disturbing activities of the project and off-site project improvement areas for the unearthing of previously unknown archaeological and/or cultural resources. No grading activities shall occur at the site or within the off-site project improvement areas until the archaeological monitor(s) has been approved by CPUC. ~~If unanticipated cultural resources are discovered, the archaeological monitor(s) shall be empowered to temporarily halt initiate a temporary halt on construction activity or divert grading equipment to allow recording and removal of the unearthed resources if the discovery is located in an active construction area. Construction shall not continue in the area until the resources are evaluated and the appropriate next steps are determined by the archaeological monitor, in consultation with the Project archaeologist.~~

- **Tribal Cultural Monitor.** SCE shall retain a tribal cultural monitor(s) from consulting tribes (i.e., Pechanga Band of Luisiño Indians and Gabrieleño Band of Mission Indians-Kizh Nation). The tribal cultural monitor(s) shall monitor all ground-disturbing activities that the consulting tribes believe warrant monitoring, represent tribal concerns, and communicate necessary information with their respective tribal councils. If construction activities require tribal cultural monitors from multiple tribes, SCE shall coordinate a revolving schedule between the consulting tribes. SCE shall provide the documentation of coordination and a fully executed Cultural Resources Monitoring and Treatment Agreement with the monitoring tribe(s) outreach efforts and the name and credentials of the proposed Native American monitor(s) to the CPUC for approval at least 14 days prior to construction. The tribes shall be given the opportunity to consult with the qualified archaeologist and provide input on the draft CRMTP during its preparation, including the Evaluation Plan and Data Recovery Plan. Upon completion of the draft CRMTP, the consulting tribes shall be given at least 30 days to provide input on the draft CRMTP. Evidence of consultation with the Tribes shall be submitted to the CPUC. The tribal cultural monitor(s) shall ~~inform the archaeological monitor if any previously undiscovered tribal cultural resources are discovered. The archaeological monitor shall be granted the authority to temporarily halt and direct grading in the immediate area of a find in order to evaluate the find and determine the appropriate next steps, in consultation with the Project archaeologist.~~

#### Cultural Resource Monitoring

- The purpose of cultural resource monitoring is to ensure proper implementation of all avoidance procedures so that cultural resources, if present, are not irretrievably lost, damaged, destroyed, or otherwise adversely affected. Cultural resource monitoring shall be conducted during all ground-disturbing activities (i.e., vegetation clearing, excavation, grading, and staging area/marshalling yard preparation within unpaved yards). The requirements for archaeological and tribal cultural monitoring shall be noted on construction plans and the worker environmental awareness training handouts. Monitors shall cease monitoring if older quaternary alluvium soils and/or bedrock is encountered.
- Monitoring teams shall work under the direct supervision of the Qualified Archaeologist in conjunction with a tribal cultural monitor. The Qualified Archaeologist and tribal cultural monitor shall attend preconstruction meetings for the project. Monitoring teams shall include one qualified archaeological monitor and one tribal cultural monitor. In the event that ground-disturbing activities occur simultaneously in multiple locations requiring monitoring, a monitoring team shall be required at each location.

#### Cultural Resources Management and Treatment Plan

- **Mapping.** The CRMTP shall include a map of all known California Register-eligible or potentially-eligible resources in and within 50 feet of work areas. Maps shall be updated by the Project Archaeologist as necessary to incorporate any new information obtained.
- **Environmentally Sensitive Areas (ESA) Delineation.** The CRMTP shall describe how historical resources eligible or potentially eligible for listing in the California Register of Historic Resources (CRHR), significant archaeological resources, and tribal cultural resources deemed significant by the tribes (collectively referred to as "significant resources") will be delineated and avoided as ESAs during construction. ESAs containing cultural resources shall not be identified ~~on the ground or on maps to be used by anyone other than the Qualified Archaeologist, archaeological monitors, and tribal cultural monitors.~~ They shall be labeled on maps ~~that would be used by the Qualified Archaeologist, archaeological monitors, and tribal cultural monitors,~~ and with signage in the field as "environmentally sensitive areas." The sole preferred method of mitigation in the CRMTP for known significant resources shall be total avoidance of the resource (preservation in place); per CEQA Guidelines Section 15126.4(b)(3)(A). The preferred method of mitigation in the CRMTP for unanticipated resources shall be total avoidance (preservation in place). If avoidance is determined to be infeasible by the CPUC, the Qualified Archaeologist, in consultation with CPUC, SCE, and consulting tribe(s), shall prepare an Evaluation Plan and Data Recovery Plan.

- Unanticipated Resource Discovery.** The CRMTP shall contain a description of procedures to be used if unanticipated cultural resources are discovered during construction. The CRMTP shall require that work shall be temporarily halted within 50 feet of the resource, appropriate temporary protective barriers shall be installed along with signage identifying the area only as an "environmentally sensitive area" and forbidding entry into the area by all but authorized personnel, and the Qualified Archaeologist, consulting tribe(s), and the CPUC shall be notified. No work will resume in the area until the Qualified Archaeologist, consulting tribe(s), and the CPUC agree to an appropriate buffer or until mitigation has been completed. The preferred method of mitigation in the CRMTP shall be total avoidance of the resource (preservation in place), per CEQA Guidelines Section 15126.4(b)(3)(A).
- Determination if a Resource is an Historical Resource.** The Qualified Archaeologist, in consultation with the consulting tribe(s) and the CPUC, shall determine if there is a potential for the resource to be an historical resource that is potentially eligible for the California Register of Historic Places (CRHP), National Register of Historic Places (NRHP), or is a Tribal Cultural Resource of significance to the consulting tribe(s). If there is no potential for the resource to qualify as an historical resource eligible for the CRHP or NRHP, or is not deemed to be a Tribal Cultural Resource of significance to the tribe(s), work shall resume after CPUC and tribal consultation and review, and CPUC approval or concurrence. The CRMTP shall include a framework for evaluating cultural resources that may also be historical resources. If there is a potential for the resource to be an eligible historical resource or historic Tribal Cultural Resource of significance to the tribe(s), the Qualified Archaeologist shall prepare an Evaluation Plan, in consultation with consulting tribe(s) if appropriate.
- Evaluation Plan.** The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource eligible listing on the CRHP or NRHP, or is a Tribal Cultural Resource of significance to the tribe(s). The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the appropriate resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to) excavation, written documentation, interviews, photography, and consultation with the consulting tribe(s). For archaeological resource testing, the Evaluation Plan shall describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test excavations (including type, number, and location of test pits and/or trenches), analysis methods (and if a tribal cultural resource, in consultation with the consulting tribe(s) as to appropriate methods of testing, if any, with the understanding that no destructive testing on such resources may commence until the Qualified Archaeologist has consulted with the consulting tribe(s) and unless the testing is agreed to in writing by the consulting tribe(s)), and reporting procedures. The Evaluation Plan shall be submitted to the consulting tribe(s) (if appropriate) and the CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an historical resource. If the discovery is not found to be a historical resource, and the consulting tribe(s) (if appropriate) and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an historical resource, SCE shall prepare a Data Recovery Plan, in consultation with the consulting tribe(s), if appropriate.
- Data Recovery Plan.** Data recovery plans for historical resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines Section 15126.4(b)(3)(C) and PRC Section 21083.2, as applicable. The Data Recovery Plan shall outline how the recovery of data from the resource will mitigate impacts to that resource to below a level of significance. The Data Recovery Plan shall describe the level of effort, including numbers and kinds of excavation units to be dug, excavation procedures, laboratory methods (no destructive testing may be undertaken until the Qualified Archaeologist has consulted the consulting tribe(s)) and the testing is agreed to in writing by the consulting tribe(s), samples (e.g., pollen, sediment, as appropriate) to be collected and analyzed, analysis techniques that will yield information relevant to the aspects of the site that make it a historical resource, and reporting procedure. This plan shall be submitted to the consulting tribe(s) for review (if appropriate), and the CPUC for review and approval upon consideration of consulting tribe(s) review. Once approved, the applicant shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared and provided to the CPUC and consulting tribe(s), if appropriate.
- Data Recovery Field Memo.** Following implementation of the Data Recovery Plan, the Data Recovery Field Memo shall be prepared whenever an unanticipated resource is discovered during construction. The Data Recovery Field Memo shall briefly describe the data recovery procedures in the field and summarize (at a field catalog level) the materials recovered. The Data Recovery Field Memo shall also identify the number and kind of samples recovered that are appropriate for special analyses, including radiocarbon dating (no such testing may be undertaken on tribal cultural resources until the Qualified Archaeologist has consulted the consulting tribe(s)), obsidian sourcing, pollen analysis, microbotanical analysis, and others, as applicable. The Data Recovery Field Memo shall be submitted to the CPUC for review and approval. Once the Data Recovery Field Memo has been approved, protective barriers may be removed, and work may proceed in the

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EPE/Mitigation Measure

Performance Standard and Timing

Location

area of the discovery. If the Data Recovery Field Memo concerns tribal cultural resources or archaeological or prehistoric resources, the Data Recovery Field Memo shall also be submitted to the consulting tribe(s) per the procedures outlined in the Data Recovery Plan. A Data Recovery Report shall then be prepared.

- **Data Recovery Report.** Within 90 days of submittal of the Data Recovery Field Memo, a Data Recovery Report shall be prepared. The Data Recovery Report shall present the results of the data recovery program, including a description of field methods, location and size of excavation units, analysis of materials recovered (including results of any special analyses conducted), and conclusions drawn from the work. The Data Recovery Report shall also indicate where artifacts, samples, and documentation resulting from the data recovery program will be curated. The Data Recovery Report shall specify that the curatorial facility meets the requirements of 36 CFR 79. The Data Recovery Report shall be submitted to the consulting tribe(s) for review, if appropriate, and the CPUC for review and approval. Once approved, the Data Recovery Report shall be filed with the Eastern Information Center. All impacted known resources and all unanticipated resources shall be recorded on California Department of Parks and Recreation 523 forms and filed at the Eastern Information Center with the Data Recovery Report. If the Data Recovery Report concerns tribal cultural resources or archaeological or prehistoric resources, the Data Recovery Report shall also be submitted to the consulting tribe(s) per the procedures outlined in the Data Recovery Plan.

- The CRMTP shall include a summary of the California laws regarding the discovery of human remains, including CEQA Guidelines Section 15064.5(e); PRC Sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code Section 7050.5. In addition, the plan shall include the contact information for the Riverside County Medical Examiner and the Native American Heritage Commission. The CRMTP shall specify that the curatorial facility, where artifacts, samples, and documentation resulting from the data recovery program shall be curated, meets the requirements of 36 CFR 79.

**MM CUL-02C: Cultural Resource Training.** All project personnel shall receive project-specific cultural resource training prior to working on the project. The training shall address appropriate work practices necessary to effectively implement project requirements, including EPEs and mitigation measures for historical resources, archaeological resources, tribal cultural resources, and human remains. The training shall address the potential for exposing subsurface resources, basic indicators of a potential resource, and required procedures if a potential resource is identified, consistent with the procedures set forth in MM CUL-02A through MM CUL-02E.

SCE shall submit the cultural resource training materials to the CPUC for approval no less than 30 days before construction. Cultural resource training materials may be submitted as part of the general Worker Environmental Training Program for the project.

**MM CUL-02D: Procedures for Discovery of Human Remains.** In the event that human remains or suspected human remains are identified, SCE shall comply with California law (Health and Safety Code § 7050.5; PRC §§ 5097.94, 5097.98, and 5097.99). The area shall be flagged off and all construction activities within 100 feet (30 meters) of the find shall immediately cease. The Qualified Archaeologist and SCE shall be immediately notified, and the Qualified Archaeologist shall examine the find. If the Qualified Archaeologist determines that there may be human remains, SCE shall immediately contact the Medical Examiner at the Riverside County Coroner's office. The Medical Examiner has two (2) working days to examine the remains after being notified by SCE. If the Medical Examiner believes the remains are Native American, he/she shall notify the NAHC within 24 hours. If the remains are not believed to be Native American, the appropriate local law enforcement agency shall be notified.

The NAHC shall immediately notify the person it believes to be the most likely descendant (MLD) of the remains, and the MLD has 48 hours of being granted access to the site to visit the discovery and make recommendations to the landowner or representative for the respectful treatment or disposition of the human remains and any associated grave goods. If the MLD does not make recommendations within 48 hours of being granted access to the site, the remains shall be reinterred in the location they were discovered and the area of the property shall be secured from further disturbance. If there are disputes between the landowners and the MLD, the NAHC shall mediate the dispute and attempt to find a solution. If the mediation fails to provide measures acceptable to the landowner, the landowner or their representative shall reinter the remains and associated grave goods and funerary objects in an area of the property secure from further disturbance. The location of any reburial of Native American human remains shall not be disclosed to the public and shall not be governed by public disclosure requirements of the California Public Records Act, California Government Code § 6250 et seq., unless otherwise required by law. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code § 6254(f).

- **Prior to Construction:** Cultural resource training materials are submitted to the CPUC at least 30 days prior to construction
- **During Construction:** All project personnel receive the CPUC-approved cultural resources training prior to working on the site
- **Following Construction:** N/A

N/A

- **Prior to Construction:** N/A
- **During Construction:** Implement procedures if human remains are discovered
- **Following Construction:** N/A

All Proposed Project areas where ground disturbance occurs

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EPZ/Mitigation Measure	Performance Standard and Timing	Location
<p><b>MM CUL-02E: Tribal Cultural Resource Avoidance Procedures.</b> SCE shall submit final construction plans to the consulting tribes and the CPUC at least 60 days prior to construction. The CPUC shall review these plans with the consulting tribes to identify any potential conflicts between the final work spaces/infrastructure locations (e.g., pole or vault locations, spur roads) and recorded tribal cultural resources. Where potential conflicts exist, the cultural resource(s) shall be evaluated according to the procedures identified in MM CUL-02B.</p> <p>When any changes in proposed activities are necessary to avoid cultural resources (e.g., project modifications or redesign), construction plans shall be modified to reflect the agreed upon changes before initiating any construction activities in the area subject to the change. Revised construction plans shall be submitted to the CPUC and affected consulting tribes at least 14 days prior to construction for confirmation of incorporated changes.</p> <p><b>In the event of an inadvertent discovery.</b> No activities shall be conducted within the boundaries of a known tribal cultural resource until SCE has obtained concurrence on avoidance and minimization methods from affected consulting tribes. The CPUC shall make a final determination if SCE cannot obtain concurrence from the tribes within 60 days of initial identification of the potential cultural resource conflict.</p> <p>Designated approved work spaces shall be physically demarcated under the direction of the Qualified Archaeologist, in consultation with the tribal cultural monitor, to ensure exclusion of known tribal cultural resources. Construction crews shall be instructed to work within designated approved work areas.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> SCE submits final construction plans to the CPUC and consulting tribes at least 60 days prior to construction; Potential cultural resource conflicts are evaluated per MM CUL-02B. Revised construction plans submitted to CPUC for confirmation of incorporate changes at least 14 days prior to construction.</li> <li>• <b>During Construction:</b> Work spaces are physically demarcated and crews are instructed to stay within designated work spaces</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>All Proposed Project areas where ground disturbance occurs</p>
<p><b>MM CUL-03: Paleontological Pre-Construction Coordination (from 2013 RTRP EIR).</b> A qualified paleontological monitor shall attend any pre-construction meetings at locations that have high potential for containing intact paleontological resources to consult with grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall work under the direction of a qualified paleontologist. A qualified paleontologist is defined as an individual with an M.S. or PhD in paleontology or geology, or closely related field, who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of Southern California, and who has worked as a paleontological mitigation project supervisor in the region for at least 1 year.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> A qualified paleontological monitor attends pre-construction meetings</li> <li>• <b>During Construction:</b> N/A</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Excavations in project areas with a high paleontological sensitivity</p>
<p><b>MM CUL-04: Paleontological Monitoring (High-Sensitivity Formations) (from 2013 RTRP EIR).</b> A qualified paleontological monitor shall spot-check the original cutting of previously undisturbed deposits of high paleontological resource sensitivity (e.g., Older Quaternary Alluvium). The paleontological monitor shall work under the direction of a qualified paleontologist.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Spot-checking during construction</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Excavation in project areas with a high paleontological sensitivity</p>
<p><b>MM CUL-04A: Paleontological Monitoring (Low-Sensitivity Formations).</b> Ground-disturbing activities that occur in areas with indeterminate, low, or marginal paleontological sensitivity may be monitored on a part-time basis <b>at the discretion of the GS outlined in the Paleontological Monitoring and Treatment Plan (PMTP) prepared by the qualified paleontologist.</b></p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Spot-checking during construction</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p><b>Applicable Locations:</b> Excavations in project areas with an indeterminate, low- or marginal-paleontological sensitivity as outlined in the PMTP</p>
<p><b>MM CUL-05: Significant Fossil Recovery (from 2013 RTRP EIR).</b> When significant fossils are discovered, the paleontologist (or paleontological monitor) shall recover them. In most cases, this fossil salvage can be completed in a short period of time. Because of the potential for the recovering of small fossil remains, such as isolated mammal teeth, it may be necessary to recover bulk sedimentary matrix samples for off-site wet screening. However, some fossil specimens (such as complete large mammal skeletons) may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) should be allowed to temporarily direct, divert, or halt earthwork activities to allow recovery of fossil remains in a timely manner.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Fossils found during construction are salvaged</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Excavations in project areas with a high paleontological sensitivity</p>
<p><b>MM CUL-06: Significant Fossil Treatment (from 2013 RTRP EIR).</b> Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, and catalogued as part of the mitigation program.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Fossils are cleaned, repaired, sorted, and catalogued</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>N/A</p>
<p><b>MM CUL-07: Fossil Donation (from 2013 RTRP EIR).</b> Prepared fossils, along with copies of all pertinent field notes, photos, maps, and measured stratigraphic sections, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the Western Center for Archaeology and Paleontology, the San Bernardino County Museum, or the San Diego Natural History Museum. Donation of the fossils shall be accompanied by financial support for initial specimen cataloguing and storage.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> N/A</li> <li>• <b>Following Construction:</b> Fossils are deposited in a scientific institution with permanent paleontological collections</li> </ul>	<p>N/A</p>



9 MITIGATION MONITORING AND REPORTING PLAN

EPEZ/Mitigation Measure	Performance Standard and Timing	Location		
<p><b>MM CUL-08: Paleontological Mitigation Report (from 2013 RTRP EIR).</b> A final summary report shall be completed that outlines the results of the paleontological mitigation program. This report shall be prepared under the supervision of a qualified paleontologist. The report will include a description and maps of the Project area; descriptions of paleontologically sensitive or fossiliferous sediments in the Project vicinity; discussions of the methods used during monitoring and during fossil recovery; descriptions and illustrations of the stratigraphic section(s) exposed; fossils collected, including taxonomic data; photographs of the locations of recovered fossils; an assessment of the significance of the recovered fossils; complete contextual data from the fossil locality, including sedimentology and taphonomy; and a record of accession of the fossils to the selected repository, including specimen numbers.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> N/A</li> <li>• <b>Following Construction:</b> Preparation of a Paleontological Mitigation Report</li> </ul>	<p>N/A</p>		
<p><b>MM CUL-08A: Paleontological Mitigation Report Approval.</b> A draft of the Paleontological Mitigation Report shall be submitted to the CPUC within 60 days of the close of construction for review and approval</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> N/A</li> <li>• <b>Following Construction:</b> SCE submits a draft Paleontological Mitigation Report to CPUC within 60 days following construction</li> </ul>	<p>N/A</p>		
<p><b>Hazards and Hazardous Materials</b></p>				
<p><b>EPE HAZ-01: Health, Safety, and Emergency Response Procedures.</b>  <i>Health and Safety Plan.</i> A health and safety plan to address site-specific health and safety issues would be prepared and implemented. The plan would address emergency medical services and procedures, including specific emergency response and evacuation measures for project personnel.  <i>Hazardous Materials and Hazardous Waste Handling.</i> A project-specific Hazardous Materials Management and Hazardous Waste Management Program would be developed prior to initiation of the project. Material Safety Data Sheets would be made available to all project workers.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> Health and Safety Plan, Hazardous Materials Management and Hazardous Waste Management Program, and Emergency Response Plan shall be developed prior to initiation of the project</li> <li>• <b>During Construction:</b> The Health and Safety Plan, Hazardous Materials Management and Hazardous Waste Management Program and Emergency Response Procedures Plan shall be implemented</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>The entire proposed 230-kV transmission alignment</p>		
<p>• Transport of Hazardous Materials: Transport of hazardous materials would be in compliance with USDOT, Calltrans and CHP regulations (Title 22 CCR, Division 4.5 and 49 CFR 261-263). Transporters of hazardous materials and waste are responsible for complying with all applicable laws, rules, and regulations, including the acquisition of required shipping papers, package marking, labeling, transport vehicle placarding, training, and registrations.</p> <p>• Refueling stations would be located in designated areas where absorbent pads and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Hazardous materials, such as paints, solvents, and penetrants, would be kept in an approved locker or storage cabinet.</p> <p><i>Emergency Release Response Procedures:</i> An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. All construction personnel, including environmental monitors, would be aware of state and federal emergency response reporting guidelines.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> SPCC, HMBP and SWPPP Plans would be prepared prior to the start of construction</li> <li>• <b>During Construction:</b> SPCC, HMBP and SWPPP Plans would be implemented</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>The entire proposed 230-kV transmission alignment</p>		
<p><b>EPE HAZ-03: Environmental Management Program.</b></p>				
<p>• <b>Spill Prevention, Control, and Countermeasure Plan (SPCC Plan):</b> In accordance with Title 40 of the CRF, Part 112, an SPCC for proposed and/or expanded substations would be prepared. The plan would include engineered and operational methods for preventing, containing, and controlling potential releases, and provisions for safe cleanup and reporting.</p> <p>• <b>Hazardous Materials Business Plans (HMBPs):</b> Prior to operation of new or expanded substations, an HMBP would be prepared or updated and submitted, in accordance with Chapter 6.95 of the CHSD, and Title 22 CCR.</p> <p>• <b>Storm Water Pollution Prevention Plan (SWPPP):</b> A project-specific construction SWPPP would be prepared and implemented prior to the start of construction of the transmission lines and substations.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> Prepare WEAP. All construction crews and contractors shall attend the training prior to starting work on the project.</li> <li>• <b>During Construction:</b> All construction crews and contractors shall attend the training prior to starting work on the project.</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>N/A</p>		
<p><b>EPE HAZ-04: Worker Environmental Awareness Program.</b> A WEAP would be prepared. All construction crews and contractors would be required to participate in WEAP training prior to starting work on the project. The WEAP would serve as a training program to provide workers with an overview of general environmental protection measures as dictated by current law and permits. It would clearly establish for construction workers the conditions they need to follow to keep the project in compliance with applicable laws.</p>			<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> (1) Verify and mark location of buried existing utilities located within 10 feet of excavation area. (2) Receive verification from utility</li> </ul>	<p>All Revised Project work areas where excavations and trenching would occur</p>
<p><b>MM HAZ-04: Uncover Existing Utility Pipelines.</b> SCE shall excavate "potholes" over the top of any buried existing utilities, including pipelines, that are located within 10 feet of a proposed excavation (e.g., pole foundation, retaining wall footing, duct bank, or vault structure) to verify the location of the existing utility prior to initiating excavation work. Potholing work shall be</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> </ul>	<p>N/A</p>		

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EPE/Mitigation Measure	Performance Standard and Timing	Location
<p>performed using a non-destructive method (e.g., air vacuum extraction) that will not damage an existing pipeline once it is encountered. Potholing work shall be conducted under the oversight of a representative of the appropriate utility company. Potholing shall reveal the top of the pipeline only and shall not go any deeper than the top of the pipe so as to not damage the pipe in any way. More than one pothole may be excavated where necessary to verify the orientation of the existing pipeline relative to the proposed excavation. Potholes shall be backfilled with removed stockpiled soil once the location and orientation of the pipeline has been verified and marked. The utility company representative shall verify and approve that backfill and compaction of the potholes has been performed adequately. If the pipeline is located within the footprint of a proposed pole foundation, no pole foundation excavation work shall commence until CPUC has been notified and the pole location has been relocated sufficiently far away from the buried pipeline.</p>	<p>company. (3) Excavate potholes to confirm existing underground utility location. (4) Relocate pole location away from buried pipeline when necessary</p> <ul style="list-style-type: none"> <li>• During Construction: N/A</li> <li>• Following Construction: N/A</li> </ul>	<p>The entire proposed 230-kV transmission alignment</p>
<p><b>MM HAZ-05: Induced Current-Voltage Touch Study.</b> SCE shall identify both aboveground and underground objects (e.g., metal fences or buried metal utility lines such as pipelines or metallic communication conductors, etc.) in the vicinity of the Proposed Project that may potentially present a shock hazard to the public or workers of any adjacent metallic utility lines, due to induced currents or voltages. The owner of any adjacent metallic utility lines shall be identified and notified about the Proposed Project. SCE shall acquire as-built documents or other facility location information from adjacent utility owners to evaluate the location and specifics of nearby metallic objects. SCE shall also obtain information/documentation from adjacent utility owners defining any quantitative hazardous shock thresholds for both public and worker exposures applicable to their facilities. In the absence of more stringent hazardous shock thresholds from adjacent utility owners, SCE shall ensure that induced voltage does not exceed 25 volts to ground under normal and emergency operating conditions in accordance, or in accordance with any other quantitative SCE public and worker safety standards.</p> <p>SCE shall prepare an Induced Current-Voltage Touch study that evaluates the conductive and inductive interference effects of the Proposed Project components on the identified objects. The Induced Current-Voltage Touch study shall model the conductive objects using the maximum anticipated voltage and/or current for the proposed 230-kV line under normal and emergency operating conditions and shall consider the construction details for the transmission line. The study shall also construct a model using fault conditions if such faults would result in higher voltages or currents on the Proposed Project facilities and higher induced voltages on adjacent metallic utilities. The maximum acceptable touch-voltage under steady-state conditions is 15 volts and the threshold for fault conditions is specified in ANSI/IEEE Standard 80. In the event that the modeled induced current voltage of a conductive objective exceeds maximum touch-voltage thresholds hazardous shock thresholds, SCE shall install grounding or other appropriate measures to protect the public and workers of any adjacent metallic utility lines from hazardous shocks.</p> <p>The Induced Current-Voltage Touch study shall include the model voltage results of conductive objects prior to implementation of grounding or other measures and after implementation of grounding or other measures. SCE shall coordinate with the owners of any potentially affected adjacent utilities to ensure that the adjacent utilities are correctly represented in the model. SCE shall give any affected utility owner concerns regarding the study validity and results to the CPUC.</p> <p>Sixty days prior to commencing construction, SCE shall provide the Induced Current-Voltage Touch study to the CPUC for approval. The Induced Current-Voltage Touch study shall include the criteria and approach that was used to determine what facilities could present a shock hazard, the results of the model prior to implementation of grounding or other measures, details of the grounding or other measures to be installed, and the results of the model after implementation of the grounding or other measures.</p> <p>If safety hazards are identified during operation, SCE shall take appropriate corrective action and document the response in accordance with CPUC General Order 95. Safety devices such as traveling grounds, guard structures, and radio-equipped public safety roving vehicles and linemen shall be in place prior to the initiation of wire-stringing activities.</p>	<p><b>Prior to Construction:</b> (1) Induced Current-Voltage Touch study and model are submitted to CPUC at least 40 days prior to start of construction for approval, (2) Safety devices (i.e., traveling grounds, guard structures, and radio-equipped public safety roving vehicles and linemen) are in place prior to initiation of wire-stringing activities</p> <p><b>During Construction:</b> Ensure that all required grounding or other appropriate measures are implemented</p> <p><b>Following Construction:</b> Address any safety concerns and document corrective action. N/A</p>	<p>The entire proposed 230-kV transmission alignment</p>
<p><b>Geology and Soils</b></p> <p>No EPEs</p> <p>No MMS</p>		

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Hydrology and Water Quality	EPE/Mitigation Measure	Performance Standard and Timing	Location
<p>EPE GEO-02: Implement Soil Erosion Protection Measures. Transmission line, substation construction and upgrades, access roads, distribution line relation and fiber optic line construction would be performed in accordance with the soil erosion and water quality protection measures specified in the Construction SWPPP.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: SWPPP Plans would be implemented</li> <li>• During Construction: SWPPP Plans would be implemented</li> </ul>	<p>Following Construction: N/A</p>	<p>The entire proposed 230-kv transmission alignment</p>
<p>EPE HYDRO-03: Dewatering Operations. If groundwater is encountered during construction as indicated by geologic borings, dewatering operations, as described in the construction SWPPP, shall be implemented. Groundwater shall not be discharged to storm drains or to Waters of the U.S., and shall be contained within the work area, using standard stormwater BMPs (e.g., straw wattles) and allowed to percolate back to the ground.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: N/A</li> <li>• During Construction: When groundwater is encountered during trench and vault installation</li> </ul>	<p>Following Construction: N/A</p>	<p>All Proposed Project work areas where excavations and trenching would occur</p>
<p>MM HAZ-04: Uncover Existing Utility Pipelines. SCE shall excavate "potholes" over the top of any buried existing utilities, including pipelines, that are located within 10 feet of a proposed excavation (e.g., pole foundation, retaining wall footing, duct bank, or vault structure) to verify the location of the existing utility prior to initiating excavation work. Potholing work shall be performed using a non-destructive method (e.g., air vacuum extraction) that will not damage an existing pipeline once it is encountered. Potholing work shall be conducted under the oversight of a representative of the appropriate utility company. Potholing shall reveal the top of the pipeline only and shall not go any deeper than the top of the pipe so as to not damage the pipe in any way. More than one pothole may be excavated where necessary to verify the orientation of the existing pipeline relative to the proposed excavation. Potholes shall be backfilled with removed stockpiled soil once the location and orientation of the pipeline has been verified and marked. The utility company representative shall verify and approve that backfill and compaction of the potholes has been performed adequately. If the pipeline is located within the footprint of a proposed pole foundation, no pole foundation excavation work shall commence until CPUC has been notified and the pole location has been relocated sufficiently far away from the buried pipeline.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: (1) Verify and mark location of buried existing utilities located within 10 feet of excavation area. (2) Receive verification from utility company. (3) Excavate potholes to confirm existing underground utility location. (4) Relocate pole location away from buried pipeline when necessary</li> <li>• During Construction: N/A</li> <li>• Following Construction: N/A</li> </ul>	<p>Following Construction: N/A</p>	<p>All Revised Project work areas where excavations and trenching would occur</p>
<p>Land Use and Planning</p> <p>No EPEs</p> <p>No MMs</p>			
<p>Noise</p>	<p>EPE NOI-01 Noise Complaint Reporting. The project (via construction contractor) would establish a telephone hot-line for use by the public to report any perceived significant adverse noise conditions associated with the construction of the project. If the telephone is not staffed 24 hours per day, the contractor would include an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. This hot-line telephone number would be posted at the project site during construction in a manner visible to passersby. This telephone number would be maintained until the project has been considered commissioned and ready for operation.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: N/A</li> <li>• During Construction: The construction contractor shall establish a telephone hot-line for construction-related complaints</li> <li>• Following Construction: N/A</li> </ul>	<p>All Proposed Project locations</p>
<p>EPE NOI-02 Noise Complaint Investigation. Throughout the construction of the project, the contractor would document, investigate, evaluate, and attempt to resolve all project-related noise complaints. The contractor or its authorized agent would:</p> <ul style="list-style-type: none"> <li>• Use a Noise Complaint Resolution Form to document and respond to each noise complaint;</li> <li>• Contact the person(s) making the noise complaint within 24 hours;</li> <li>• Conduct an investigation to attempt to determine the source of noise related to the complaint; and</li> <li>• Take all reasonable measures to reduce the noise at its source.</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to Construction: N/A</li> <li>• During Construction: Construction-related complaints will be investigated and responded to within 24 hours</li> <li>• Following Construction: N/A</li> </ul>	<p>Following Construction: N/A</p>	<p>All Proposed Project locations</p>

9 MITIGATION MONITORING AND REPORTING PLAN

EPE/Mitigation Measure	Performance Standard and Timing	Location
<p><b>EPE NOI-03 Construction Practices.</b> The following are typical field techniques for reducing noise from construction activities on a project site, with the purpose of reducing aggregate construction noise levels at nearby noise sensitive receptors:</p> <ul style="list-style-type: none"> <li>To the extent practical and unless safety provisions require otherwise, adjust all audible back-up alarms downward in sound level, reflecting vicinities that have expected lower background level, while still maintaining adequate signal-to-noise ratio for alarm effectiveness. Consider signal persons, strobe lights, or alternative safety equipment and/or processes as allowed, for reducing reliance on high-amplitude sonic alarms.</li> <li>As practical and observing safety considerations, place stationary construction noise sources that tend to operate continuously and/or for extended periods of time, such as generators and air compressors, as far away as possible from potentially affected noise sensitive receptors. Place non-noise-producing mobile equipment such as trailers in the direct sound pathways between suspected major noise-producing sources and sensitive receptors.</li> <li>Limit mobile construction equipment or vehicle engine idling duration, so that such continuous sources of noise do not unnecessarily contribute to an aggregate construction noise level.</li> </ul>	<ul style="list-style-type: none"> <li><b>Prior to Construction:</b> N/A</li> <li><b>During Construction:</b> Implement noise-reducing construction activity practices</li> <li><b>Following Construction:</b> N/A</li> </ul>	<p>All Proposed Project locations where high-noise-generating equipment is used</p>
<p><b>EPE NOI-04 Noise Reduction Practices.</b> The following are typical practices for construction equipment selection (or preferences) and expected function that can help reduce noise.</p> <ul style="list-style-type: none"> <li>Pneumatic impact tools and equipment used at the construction site would have intake and exhaust mufflers recommended by the manufacturers thereof, to meet relevant noise limitations.</li> <li>Provide impact noise producing equipment (i.e., jackhammers and pavement breaker[s]) with noise attenuating shields, shrouds or portable barriers or enclosures, to reduce operating noise.</li> <li>Line or cover hoppers, storage bins, and chutes with sound-deadening material (e.g., apply wood or rubber liners to metal bin impact surfaces).</li> <li>Provide upgraded mufflers, acoustical lining, or acoustical paneling for other noisy equipment, including internal combustion engines.</li> <li>Use alternative procedures of construction and select a combination of techniques that generate the least overall noise and vibration.</li> <li>Use construction equipment manufactured or modified to reduce noise and vibration emissions, such as:             <ul style="list-style-type: none"> <li>Electric instead of diesel-powered equipment.</li> <li>Hydraulic tools instead of pneumatic tools.</li> <li>Electric saws instead of air- or gasoline-driven saws.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><b>Prior to Construction:</b> N/A</li> <li><b>During Construction:</b> Implement construction equipment practices to reduce noise</li> <li><b>Following Construction:</b> N/A</li> </ul>	<p>All Proposed Project locations where high-noise-generating equipment is used</p>
<p><b>EPE NOI-05 After-Hours Construction.</b> In the event construction activities are considered necessary on days or hours outside of what is specified by noise ordinance, SCE would provide advanced notification (as required by ordinance or as agreed upon with the local jurisdiction) of such anticipated activity to the CPUC, the local municipality or County where anticipated work is to be performed, and to residents within 300 feet of the anticipated work. This notification would include a general description of the work to be performed, location, and hours of construction anticipated. Additionally, SCE or its contractors would route all construction traffic and/or helicopter flight(s) away from residences, schools and recreational facilities to the maximum extent feasible.</p> <p><b>MM NOI-01: High-Noise-Generating Equipment.</b> SCE shall implement typical noise-reducing construction practices as identified in EPE NOI-03 and EPE NOI-4 to reduce noise levels when working within 100 feet of receptors. If high-noise-generating equipment must be used, SCE shall limit the use of high-noise-generating equipment to between the hours of 9:00 am and 3:00 pm when constructing within 100 feet of receptors in the City of Jurupa Valley. High-noise-generating equipment shall be defined as any piece of equipment that generates a maximum [L<sub>max</sub>] noise level of 85 dBA or greater at a reference distance of 50 feet <u>from a sensitive receptor where noise mitigating structures (such as sound walls) do not exist</u>. The following equipment have been identified as high-noise-generating equipment:</p> <ul style="list-style-type: none"> <li>Clam shovel</li> <li>Concrete saw</li> <li>Jackhammer</li> <li>Hydra break ram</li> <li>Pile driver</li> <li>Vacuum excavator</li> </ul>	<ul style="list-style-type: none"> <li><b>Prior to Construction:</b> N/A</li> <li><b>During Construction:</b> Provide advanced notification when construction activity is required outside of hours specified on noise ordinances</li> <li><b>Following Construction:</b> N/A</li> </ul>	<p>All Proposed Project locations</p>
<p><b>MM NOI-01: High-Noise-Generating Equipment.</b> SCE shall implement typical noise-reducing construction practices as identified in EPE NOI-03 and EPE NOI-4 to reduce noise levels when working within 100 feet of receptors. If high-noise-generating equipment must be used, SCE shall limit the use of high-noise-generating equipment to between the hours of 9:00 am and 3:00 pm when constructing within 100 feet of receptors in the City of Jurupa Valley. High-noise-generating equipment shall be defined as any piece of equipment that generates a maximum [L<sub>max</sub>] noise level of 85 dBA or greater at a reference distance of 50 feet <u>from a sensitive receptor where noise mitigating structures (such as sound walls) do not exist</u>. The following equipment have been identified as high-noise-generating equipment:</p> <ul style="list-style-type: none"> <li>Clam shovel</li> <li>Concrete saw</li> <li>Jackhammer</li> <li>Hydra break ram</li> <li>Pile driver</li> <li>Vacuum excavator</li> </ul>	<ul style="list-style-type: none"> <li><b>Prior to Construction:</b> N/A</li> <li><b>During Construction:</b> Limit high-noise-generating equipment use in Jurupa Valley to between 9:00 am and 3:00 pm</li> <li><b>Following Construction:</b> N/A</li> </ul>	<p>All Revised Project locations within the City of Jurupa Valley where high-noise-generating equipment is used <u>within 100 feet of residences</u></p>

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EPI/Mitigation Measure	Performance Standard and Timing	Location
<p><b>MM NOI-02: Additional Noise Reduction.</b> SCE shall plan all construction activities with the potential to exceed the City-identified noise ordinance limits within 300 feet of receptors, including concrete pours, such that they are completed by 6:00 pm in Jurupa Valley and 7:00 pm in Riverside to avoid conflicts with local jurisdiction noise ordinances. SCE shall implement all available noise reduction techniques identified in EPIs NOI-03 and NOI-04 in construction areas within 300 feet of sensitive receptors (residences and schools) to reduce noise levels at the receptors. Construction meetings, site setup or cleanup activities that occur outside of City-identified construction hours must meet the noise ordinance limits (measured at receptors) of 55 dBA between 7:00 pm and 10:00 pm and 45 dBA between 10:00 pm and 7:00 am.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: N/A</li> <li>• During Construction: Apply noise reduction measures</li> <li>• Following Construction: N/A</li> </ul>	<p>All Revised Project locations within 300 feet of a sensitive receptor</p>
<p><b>MM NOI-03: Trench Plate Noise Reduction.</b> SCE shall implement techniques to reduce noise generated by vehicle traffic over temporary trench plates. These techniques shall include one or more of the following, as necessary:</p> <ul style="list-style-type: none"> <li>• Implement traffic calming measures to reduce vehicle speeds</li> <li>• Ensure trench plates are appropriately secured</li> <li>• Utilize trench plates of a low noise-generating material</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to Construction: N/A</li> <li>• During Construction: Apply trench plate noise reduction measures</li> <li>• Following Construction: N/A</li> </ul>	<p>All Revised Project locations where temporary trench plates are used</p>
<p><b>MM NOI-04: Construction Notification.</b> SCE shall provide notice by mail at least 1 week prior to construction activities to all sensitive receptors and residences within 500 feet of all construction. The announcement shall state where and when project construction will occur and provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction. Notices shall also include the phone number for the noise complaint telephone hot-line described in EPI NOI-1. <b>Notified residents may request alternative lodging for the days that active construction is occurring adjacent to their residence; alternative lodging shall consist of a standard room at a hotel located within 6 miles of the affected residence or as close as feasible.</b></p>	<ul style="list-style-type: none"> <li>• Prior to Construction: Post and mail notices at least 1 week prior to construction activities</li> <li>• During Construction: N/A</li> <li>• Following Construction: N/A</li> </ul>	<p>Sensitive receptors and residences within 500 feet of construction</p>
<p><b>Recreation</b></p>		
<p><b>EPE REC-01: Recreational Area Restrictions.</b> In the event of short-term restriction on recreation use at parks, or on existing bike lanes, bike paths, or trails are necessary during project construction, the public would be notified in coordination with the agencies that manage the impacted resource.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: N/A</li> <li>• During Construction: Public and managing agencies are notified regarding restriction to use of recreation facilities</li> <li>• Following Construction: N/A</li> </ul>	<p>Recreation areas within the Proposed Project area</p>
<p><b>EPE REC-02: Closure Notices.</b> When temporary park or trail closures are necessary, on-site notices would be posted prior to the closure.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: N/A</li> <li>• During Construction: On-site notices posted prior to closures of recreation facilities</li> <li>• Following Construction: N/A</li> </ul>	<p>Recreation areas within the Proposed Project area</p>
<p><b>EPE REC-03: Revegetation.</b> Any park areas temporarily affected by project construction would be revegetated and returned to preconstruction conditions.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: N/A</li> <li>• During Construction: N/A</li> <li>• Following Construction: Revegetate affected recreation facilities</li> </ul>	<p>Recreation areas within the Proposed Project area</p>
<p><b>MM REC-01: Recreation Area Closures (from 2013 RIRP EIR).</b> When temporary short-term closures to recreational areas are necessary for construction activities, closures would be coordinated with recreational facility owners. Schedule construction activities to avoid heavy recreational use periods (e.g., holidays or tournaments). Post notices prior to the closure.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: SCE coordinates with facility owners and posts notices prior to closure</li> <li>• During Construction: SCE coordinates with facility owners and posts notices prior to closure</li> <li>• Following Construction: N/A</li> </ul>	<p>Goose Creek Golf Club</p>
<p><b>MM REC-03: Maintain Access to Trails and Parks.</b> SCE shall identify existing alternate routes to allow park, trail, and path users to circumvent access points or alternate trail segments for those areas that are inaccessible or closed due to construction activities. Trail detours must be located on existing trails or unvegetated areas and shall not be located where they could impact sensitive biological resources. Trail detours may be placed, when feasible and safe to do so, along the perimeter of active work areas or through inactive work areas when it is safe to do so. Proposed SCE shall propose alternate routes delineated on project plans and provided to the CPUC at least 30 days prior to construction for review and approval. Signs shall be posted at trail entrances to inform trail users of construction activities that may be encountered, such as excavations, and vehicles and equipment on trails.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: Submit all of proposed alternative park, trail, and bike path routes to CPUC for review and approval at least 30 days prior to construction</li> <li>• During Construction: SCE installs and maintains signs informing trail users of detours or closures</li> <li>• Following Construction: N/A</li> </ul>	<p>Revised Project construction work and staging areas at 68th Street and Lucreia Avenue, 68th Street and Dana Avenue, Limonite Avenue and Pals Ranch Road, Landon Drive and Wineville Avenue, and at Distribution Line Relocations #7 and #8</p>

9 MITIGATION MONITORING AND REPORTING PLAN

EPE/Mitigation Measure	Performance Standard and Timing	Location
<p><b>MM REC-04: Trail and Recreation Area Conditions and Repairs.</b> SCE shall prepare a Pre-Project Trail and Recreation Area Condition Report prior to construction that documents the condition of designated trails, proposed detour routes, and recreational areas located within Revised Project work areas. The Pre-Project Trail and Recreation Area Condition Report shall be submitted to the CPUC no less than 30 days before construction.</p> <p>SCE shall repair all damage to trails, detour routes, and recreation areas caused by construction vehicles and equipment <b>by the within 30 days after</b> completion of construction. SCE shall prepare a Post-Project Trail and Recreation Area Condition Report documenting the final state of all trails and recreation areas within the Revised Project work areas. The Post-Project Trail and Recreation Area Condition Report shall be submitted to the CPUC within <b>30 60</b> days of completing construction in each project segment. SCE shall complete all trail and recreation area repairs to the approval of the <b>appropriate land owner, land agency, or city. SCE shall provide copies of the approval to the</b> CPUC. SCE shall restore all LWCF land to pre-existing conditions within 12 months from the start of construction.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> SCE submits a Pre-Project Trail and Recreation Area Condition Report to the CPUC 30 days before construction</li> <li>• <b>During Construction:</b> Trail and recreation area damage is adequately repaired within 12 months from start of construction</li> <li>• <b>Following Construction:</b> SCE submits a Post-Project Trail and Recreation Area Conditions Report to the CPUC within <b>30 60</b> days of completing construction</li> </ul>	<p>Revised Project construction areas of 68th Street and Lucretia Avenue, 68th Street and Dana Avenue, Limonite Avenue and Pats Ranch Road, Landon Drive and Winesville Avenue, at Distribution Line Relocations #7 and #8, and Goose Creek Golf Club</p>
<p><b>MM REC-05: Maintain Access to Equestrian Trails.</b> SCE shall maintain access to primary and secondary equestrian trails within the Equestrian Lifestyle Protection Overlay. Where closure of equestrian trails is necessary, SCE shall provide detours and appropriate signage to notify users of construction activities.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> SCE maintains access to equestrian trails and posts signage as needed</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>68th Street between Limonite Avenue and Lucretia Avenue</p>
<p><b>Transportation and Traffic</b></p>		
<p><b>EPE TRANS-01: Minimize Street Use.</b> Construction activities would be designed to minimize work on, or use of, local streets.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Minimize construction activity on local streets</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Proposed Project alignment</p>
<p><b>EPE TRANS-02: Incorporate Protective Measures.</b> Any construction or installation work requiring the crossing of a local street, highway, or rail line would incorporate the use of guard poles, netting, or similar means to protect moving traffic and structures from the activity. If necessary to ensure the safety of construction crews and the traveling public on state highways, continuous traffic breaks operated by the California Highway Patrol would be planned and provided.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Incorporate the use of protective measures when construction or installation crosses streets, highways or rail lines</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Proposed Project alignment</p>
<p><b>EPE TRANS-03: Prepare Traffic Control Plans.</b> Traffic control and other management plans would be prepared to minimize project impacts on local streets. Traffic control and other management plans would be prepared to minimize proposed project impacts on local streets and bike lanes, railroad operations (Union Pacific, Metrolink), emergency services, transit bus operations, recreation facilities, school bus operations and other planned roadway projects. The plans would be developed in collaboration with the responsible agencies of these transportation modes, programs, and projects. The plans will include provisions to accommodate emergency response vehicles at all times, such as immediately stopping work for emergency vehicle passage, short detours, and alternate routes.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> Prepare Traffic Management Plans</li> <li>• <b>During Construction:</b> Implement Traffic Management Plans</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Proposed Project alignment</p>
<p><b>EPE TRANS-04: Repair Damaged Streets.</b> Any damage to local streets caused as a result of project construction would be repaired and restored to preconstruction conditions.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> N/A</li> <li>• <b>Following Construction:</b> Repair damage to local streets caused by construction</li> </ul>	<p>Proposed Project alignment</p>
<p><b>MM TRANS-02: Avoid Peak-Period Construction (from 2013 RTP EIR).</b> To minimize traffic congestion and delays during construction, RPU and SCE shall restrict all necessary lane closures or obstructions on major roadways (i.e., Congestion Management Plan roadways) associated with project construction activities to off-peak periods. Lane closures shall be avoided during the 6:00 a.m. to 9:00 a.m. timeframe and the 3:30 to 6:30 p.m. timeframe, or as otherwise defined within the TMPs.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Restrict lane closures and other obstructions on CMP roadways to off-peak periods</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Construction of the underground 230-kV transmission line within Limonite Avenue</p>
<p><b>MM TRANS-02A: Avoid Peak-Period Closures and Obstructions on All Roadways.</b> To minimize traffic congestion and delays during construction <b>and maintenance</b> of the underground 230-kV transmission line, SCE shall schedule all necessary road or lane closures or obstructions on all roadways associated with project construction <b>and maintenance</b> activities during off-peak periods. Road and lane closures shall be avoided during the 6:00 a.m. to 9:00 a.m. timeframe and the 3:30 to 6:30 p.m. timeframe, or as otherwise defined within CPUC and City-approved traffic control plans.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> Restrict road and lane closures and other obstructions on all roads to off-peak periods</li> <li>• <b>Following Construction:</b> <b>Restrict road and lane closures and other obstructions on all roads to off-peak periods</b></li> </ul> <p>N/A</p>	<p>Construction of the underground 230-kV transmission line</p>

9 MITIGATION MONITORING AND REPORTING PLAN

EPE/Mitigation Measure	Performance Standard and Timing	Location
<p><b>MM TRANS-04: Bus Transit Route (from 2013 RTRP EIR).</b> Provide construction closures that keep at least one lane of traffic open with reversible flow (via flagmen) during times of transit line operation, unless an adequate detour route can be found within 0.25 mile of the closure point.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> (1) Maintain one lane of traffic open with reversible flow, or (2) Provide an adequate detour route within 0.25 mile</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Underground 230-kV Transmission line alignment along bus routes</p>
<p><b>MM TRANS-05: Roadway with Class I or Class II Bicycle Facility (from 2013 RTRP EIR).</b> Provide construction closures that allow for continued bicycle access within the existing facilities during all times, or provide a safe diversion of the bicycle facility around the construction zone.</p>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> N/A</li> <li>• <b>During Construction:</b> (1) Either permit bicycle access through Pats Ranch Road/ Limonite Avenue during lane closures crossing this intersection, or (2) Provide a safe diversion of the bicycle facility around the construction zone</li> <li>• <b>Following Construction:</b> N/A</li> </ul>	<p>Limonite Avenue approaching the intersection with Pats Ranch Road from the west</p>
<p><b>MM TRANS-06: Prepare Traffic Control Plans.</b> Prior to the start of construction, SCE shall prepare and submit Motorized and Non-Motorized Traffic Control Plans (TCPs) to the CPUC for review and approval at least 40 days prior to commencing construction activities. The plans shall be prepared in consultation with all agencies with jurisdiction (e.g., City of Jurupa Valley) over public roads that would be directly affected by construction activities (where road closures or encroachments would be necessary) for review and approval at least 40 days prior to commencing construction activities.</p> <p>At a minimum, the TCPs shall include the following details and traffic control measures:</p> <ul style="list-style-type: none"> <li>• <b>Lane and Road Closures</b> <ul style="list-style-type: none"> <li>- Details regarding the locations and timing of all temporary road and lane closures.</li> <li>- Implement standard safety practices, including installation of appropriate barriers between work zones and transportation facilities, placement of appropriate signage, cones, and use of traffic control devices.</li> <li>- Designate traffic detours for any road or lane closures with appropriate signage marking the detours.</li> </ul> </li> <li>• <b>Construction Traffic</b> <ul style="list-style-type: none"> <li>- Time worker commutes and material deliveries to avoid peak (AM and PM) commuting hours.</li> <li>- Workers shall carpool to and from work sites and Eltiwanda Marshalling Yard.</li> <li>- Plans for construction worker parking and transportation to work sites.</li> </ul> </li> <li>• <b>Traffic Safety</b> <ul style="list-style-type: none"> <li>- Use flaggers and/or signage to guide vehicles through or around construction zones using proper techniques for construction activities including staging yard entrance and exit.</li> <li>- Store all equipment and materials in designated work areas in a manner that minimizes traffic obstructions and maximizes sign visibility.</li> <li>- Limit vehicles to safe speed levels according to posted speed limits, road conditions, and weather conditions.</li> <li>- Route trucks to avoid minor roads, where possible, to reduce congestion and potential asphalt damage.</li> </ul> </li> <li>• <b>Encroachment Permit</b> <ul style="list-style-type: none"> <li>- Abide by encroachment permit conditions, which shall supersede conflicting provisions in the TCP.</li> </ul> </li> <li>• <b>Notification</b> <ul style="list-style-type: none"> <li>- SCE shall notify local emergency personnel (i.e., fire departments, police departments, ambulance, and paramedic services), residents within 300 feet, and schools providing school bus service in the area (i.e., Troth Elementary and Louis Vandermalen Fundamental Elementary) at least 7 days prior to lane or road closures. The notice shall include location(s), date(s), time(s), and duration of closure(s), and a contact number for SCE project personnel.</li> </ul> </li> <li>• <b>Access</b> <ul style="list-style-type: none"> <li>- Emergency access procedures shall be defined. SCE shall be ready at all times to accommodate emergency vehicles by immediately stopping work for emergency vehicle passage, providing short detours, or providing alternate routes developed in conjunction with local agencies.</li> <li>- SCE shall maintain travel through intersections at all times during construction, operation, and maintenance.</li> <li>- SCE or its construction contractors shall provide the ability to quickly lay a temporary steel plate trench bridge upon request of the property owner in order to ensure reasonable driveway access to businesses and residences adjacent to work areas during construction hours, and shall provide continuous access to adjacent properties when not</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>Prior to Construction:</b> (1) Prepare Motorized and Non-Motorized TCPs, (2) Submit TCPs to the CPUC and City of Jurupa Valley</li> <li>• <b>During Construction:</b> Implement the traffic control measures detailed in the TCPs</li> <li>• <b>Following Construction:</b> N/A</li> </ul> <p>Underground 230-kV Transmission line construction work areas and traffic routes</p>	

9 MITIGATION MONITORING AND REPORTING PLAN

EPE/Mitigation Measure

Performance Standard and Timing

Localities

actively constructing the underground 230-kV transmission line. In the event of an emergency, steel plating shall be placed over underground work areas and vehicles/equipment shall be removed from the partially or fully closed roadways to the greatest extent feasible, as needed, to permit uninterrupted traffic flow. SCE or its construction contractor shall designate a job site manager responsible for ensuring emergency access. All workers shall be trained in emergency access procedures.

**MM TRANS-07: Post-Construction Road and Sidewalk Repair.** SCE shall conduct a pre-construction road and sidewalk condition assessment along roadways and sidewalks along the underground alignment and construction traffic routes, prior to construction. The pre-construction road and sidewalk condition assessment shall include photographs or a video recording along the construction route public roads within 500 feet in each direction of project access points and roadways where the road surface would be damaged by project-related trenching and digging. SCE shall submit the pre-construction road and sidewalk condition assessment to the CPUC and the City of Jurupa Valley no less than 30 days prior to construction. Following construction, SCE shall conduct a post-construction road and sidewalk condition assessment along 68th Street, Pats Ranch Road, Limonite Avenue, Wineville Avenue, Cantu-Galleano Ranch Road, and Eliwanda Avenue. If damage to roads occurs as a result of project construction or construction traffic, SCE shall restore damaged roadways and sidewalk (e.g., asphalt, curbs, and gutters) within 60 days after the completion of construction to a pre-construction condition, based on the pre-construction road and sidewalk condition assessment, or to a condition agreed upon by SCE and the roadway owner, at their own expense under the direction of and to the construction standard of the City of Jurupa Valley to ensure that impacted roads are adequately repaired.

Underground 230-kV transmission line construction work areas and traffic routes

- **Prior to Construction:** Submit pre-construction road and sidewalk condition assessment covering applicable roadways to the CPUC and the City of Jurupa Valley no less than 30 days prior to construction
- **During Construction:** N/A
- **Following Construction:** (1) Conduct a post-construction road and sidewalk condition assessment along applicable roadways. (2) If damage is found, repair of damaged roadways and sidewalks will occur within 60 days of completion

**MM TRANS-08: Public Transit, Bicycle, Equestrian, and Pedestrian Facilities.** The following measures shall be implemented during construction, operation and maintenance of the underground 230-kV transmission line:

Underground 230-kV transmission line alignment

- SCE shall coordinate with Riverside Transit Authority to re-locate bus stops and/or re-route affected transit services via parallel streets during construction when affected transit service is subject to delays resulting from partial street closure or inaccessible transit stops due to full street closure.
- SCE shall post signs at the affected bus stops on Pats Ranch Road and Limonite Avenue. The signs shall be posted at least 2 weeks in advance of road or lane closures and shall indicate when the bus stops along Pats Ranch Road or Limonite Avenue would be unavailable and where the nearest bus stop for RTA bus lines 29 or 3 is located.
- SCE shall post signs at pedestrian/equestrian intersections at least 2 weeks in advance of construction that are anticipated to be affected by closures and/or detours. These signs shall state the date range of construction and shall indicate the route of pedestrian/equestrian detours during construction.
- Warning signs shall be posted on sidewalks/trails where construction limits pedestrian/equestrian access and to identify which side of the street can be safely accessed at intersections prior to construction zones.
- SCE or its construction contractors shall use "share the road" signs within the construction zones where partial closures would occur; obtain a temporary permit to allow bicyclists to use the sidewalks to bypass the construction zones where allowed by the local jurisdiction; and provide clear signs using the bicycle symbol to guide bicyclists to detour routes.

- **Prior to Construction:** (1) Coordinate with the Riverside Transit Authority to re-locate bus stops and/or re-route affected transit services. (2) Post signs 2 weeks prior to construction, at bus stops and pedestrian/equestrian intersections that will be affected by closures and/or detours. (3) Notices will provide information regarding the duration of closure and detour/alternate routes. (4) Obtain a permit, if feasible, to allow bicyclists to use sidewalks to bypass construction areas
- **During Construction:** (1) Erect "share the road" signs within construction zones where partial closures will occur. (2) Post signs informing pedestrians/equestrians of upcoming areas with limited pedestrian/equestrian access to permit safe crossing at intersections
- **Following Construction:** (1) Post signs 2 weeks prior to construction, at bus stops and pedestrian intersections that will be affected by closures and/or detours. (2) Notices will provide information regarding the duration of closure and detour/alternate routes. (3) Erect "share the road" signs within construction zones where partial closures will occur. N/A

Public Services and Utilities

**EPE UTIL-01: Disposal of Construction Waste Material.** Recyclable construction waste materials shall be recycled. Non-recyclable waste materials shall be categorized and disposed of at a licensed location.

Proposed Project alignment

- **Prior to Construction:** N/A
- **During Construction:** Recycle construction materials; categorize and dispose of non-recyclable waste materials at a licensed location
- **Following Construction:** N/A

**MM UTIL-01: Notify Utility Companies and Adjust Underground Work Locations.** SCE shall notify all utility companies with utilities located within or crossing SCE ROW and franchise agreement areas to locate and mark existing underground utilities along the entire length of the revised overhead and underground alignments at least 30 days prior to construction. No subsurface work shall be conducted that would conflict with (i.e., directly impact or compromise the integrity of) a buried utility. Conflicts shall be identified and addressed with the affected utility during final engineering. In the event of a conflict, the Revised Project

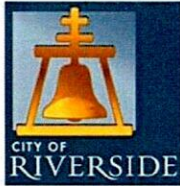
Revised Project underground alignments

- **Prior to Construction:** (1) SCE notifies utility companies at least 30 days prior to construction. (2) Existing underground utilities are marked within the Revised Project alignment. (3) SCE provides CPUC with documentation of contact and response from the utility



9 MITIGATION MONITORING AND REPORTING PLAN

EPE/Mitigation Measure	Performance Standard and Timing	Location
<p>alignment shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering. SCE shall provide CPUC with documentation of contact and response from the utility companies prior to construction. SCE shall also provide documentation of any changes in the Revised Project alignment for review and approval at least 30 days prior to construction.</p>	<p>companies, and documentation of any changes in the Revised Project alignment</p> <ul style="list-style-type: none"> <li>• During Construction: Underground utilities are avoided, and the integrity of existing underground utilities is maintained</li> <li>• Following Construction: N/A</li> </ul>	<p>Revised Project overhead and underground alignments</p>
<p><b>MM UTIL-02: Public Notification of Utility Service Interruption.</b> Prior to construction in which a utility distribution service interruption is known to be unavoidable, SCE shall notify members of the public affected by the planned outage at least 10 calendar days prior to the impending interruption for residential and commercial outages. Copies of the notices and dates shall be provided to the CPUC at the time the notices are distributed to the public. In the event of an unforeseen utility service disruption, SCE shall immediately notify the CPUC and affected utility company/companies to determine appropriate actions.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: N/A</li> <li>• During Construction: SCE notifies members of the public and the CPUC at least 10 days prior to pending service interruption</li> <li>• Following Construction: N/A</li> </ul>	<p>Revised Project overhead and underground alignments</p>
<p><b>MM UTIL-03: Cathodic Protection.</b> During final engineering SCE shall determine and report to CPUC the location of adjacent utilities. If SCE identifies utilities in proximity of the 230-kV transmission line that may be susceptible to corrosion due to induced currents or voltages, SCE shall conduct an alternating current interference study that evaluates the alternating current interference effects of the proposed 230-kV transmission line on nearby parallel metallic pipelines. The study shall include the development of a model using the maximum anticipated voltage for the proposed transmission line and shall consider the construction specifications for the transmission line, including conductor arrangement. In addition, SCE shall identify utility facilities within 100 feet of the proposed transmission line that may be susceptible to corrosion due to induced currents or voltages. For all utilities identified with a corrosion potential, SCE shall coordinate with the owner of the utility and use data gathered in the alternating current interference study to determine appropriate design measures to protect the pipeline from corrosion, such as ground mats or gradient control wires for cathodic protection of the buried utility pipelines. The study, summary of coordination with potentially affected utilities, and specifications of any design measures to be installed shall be submitted to the CPUC for review and approval at least 60 days prior to initiation of construction. If there are no utilities identified with a corrosion potential, as verified by the CPUC, no alternating current interference study or cathodic protection mitigation is required.</p>	<ul style="list-style-type: none"> <li>• Prior to Construction: Interference Study Report shall be submitted to the CPUC 60 days prior to construction</li> <li>• During Construction: SCE coordinates with the owner of the utility to implement appropriate design measures</li> <li>• Following Construction: N/A</li> </ul>	<p>Revised Project underground alignment</p>



*City of Arts & Innovation*

July 1, 2020

To: Park District Board of Directors-Riverside County  
4080 Lemon Street, 5th Floor  
Riverside, California 92501  
[Parks-Planning@rivco.org](mailto:Parks-Planning@rivco.org)

Cc: Chamberlain, Shannon  
[snchamberlain@rivco.org](mailto:snchamberlain@rivco.org)

Subject: City of Riverside's support for conversion land in matter of Riverside Transmission Reliability Project (RTRP) - Land and Water Conservation Fund Act (LWCF)

The Honorable Board,

This is in reference to the Riverside Transmission Reliability Project (RTRP), specifically related to the conversion of Land and Water Conservation Fund (LWCF) Section 6(f)(3) lands to non-recreational uses that will be required for establishment of the easement for the 230kV transmission line across certain portions of the Hidden Valley Wildlife Area (HVWA). The City of Riverside is in concurrence with the proposed LWCF conversion outline below for the RTRP.

As you may be aware, The California Public Utilities Commission (CPUC) on March 12, 2020 approved the RTRP, a joint high-voltage utility project of Southern California Edison (SCE) and City of Riverside Public Utilities (RPU). The Project consists of approximately five (5) miles of overhead and approximately four (4) miles of underground 230 kV transmission line, as well as 69 kV sub-transmission lines and other facility upgrades.

The 230 kV transmission line component of the RTRP would cross portions of the HVWA, managed by the Riverside County Regional Park and Open Space District (District), on the south side of the Santa Ana River in several locations. The affected HVWA lands were funded, in part, under the LWCF, a federal program that provides funds to local and other agencies for the acquisition of public recreation land. The RTRP would affect approximately 10.8 acres of HVWA LWCF funded lands in three (3) general locations (see Attachment 1 – Project Location). These "Conversion Areas" would be permanently utilized for electrical transmission infrastructure.

The lands currently associated with LWCF that would be converted by the construction of the overhead 230 kV transmission line component of the project are within the HVWA. As the manager of HVWA, the District must apply for the conversion of these lands and also propose replacement property to mitigate for the loss of LWCF lands. The conversion and replacement application proposal is administered by the California Department of Parks and Recreation, Office of Grants and Local Services (OGALS) and would require approval by the National Park Service (NPS).

The Replacement Property is a similarly sized contiguous portion of a land parcel (#153240030-6), co-owned by the City of Riverside and Riverside County and located near the park's entrance north of Arlington Avenue. 10.8 acres of the Replacement Property would be designated as LWCF Section 6(f)(3) and incorporated into the HVWA to compensate for the loss of recreational lands within the park as a result of the RTRP. No zone change is proposed as a result of the Conversion Area and Replacement proposal.

The California Department of Fish and Wildlife (CDFW) and Riverside County own the parcels that are proposed to be crossed and converted to non-recreational lands by the 230 kV transmission line. CDFW has completed their internal Land Conversion Evaluation (LCE) process and approved the conversion as evaluated in the LCE on March 14, 2020.

The RPU, County of Riverside and SCE have worked closely on LWCF Conversion Area and Replacement proposal matters, have come to an agreement on the lands that will be converted as well as the proposed replacement property (Refer Attachment 2 - Memorandum of Understanding [MOU] with Riverside County), and have determined the steps to be taken to complete the conversion process with NPS and OGALS.

As per the MOU, RPU, County of Riverside and SCE agreed on:

- Project mapping which identifies the areas and size of conversion of LWCF lands
- Use of parcel #153-240-030, 16.35 acres in size and co-owned by the County and City of Riverside, for replacement property of the converted LWCF lands.
- The replacement property parcel #153-240-030 remaining in co-ownership by County and City of Riverside.

The LWCF process involves the following steps:

1. Identification of Replacement Property. (complete)
2. Prepare Proposal Development and Environmental Screening Form (PD/ESF). (complete)
3. CDFW Director signature on Land Conversion Evaluation (LCE). (complete)
4. District and Board approval of proposed conversion. (pending)
5. Submit PD/ESF to OGALS and National Park Service (NPS). (pending)  
-Please note that State Parks has already provided a review of the PD/ESF
6. Finalize PD/ESF with NPS. (pending)
7. Prepare NEPA document. Assume Environmental Assessment (EA). (pending)
8. Public review of NEPA document. (pending)
9. Prepare Finding of No Significant Impact (FONSI). (pending)
10. NPS decision on LWCF conversion. (pending)

Currently, the LWCF process awaits approval of proposed conversion from Riverside County Parks and County Supervisor so that the subsequent steps (5 through 10) in the process may proceed.

As a partial owner of the replacement property for LWCF Conversion, the City of Riverside agrees to the LWCF process above and is supporting of the proposed replacement property (parcel #153-240-030) receiving the LWCF Section 6(f)(3) designation.

The City of Riverside hereby requests the Riverside County Board to consider this letter of support from City of Riverside in their process of making a decision for approval of LWCF land conversion and the replacement property.

Please let us know if you need any assistance in your reviews and processing of approvals for the proposed conversion, replacement and expansion of the HVWA at the County level.

Sincerely,

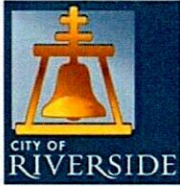
A handwritten signature in black ink, appearing to read 'Rusty Bailey', with a stylized flourish at the end.

Rusty Bailey  
Mayor, City of Riverside

Attachments:

1. Project Location and LWCF Section 6(f) Boundary Map "Attachment\_1-Map.pdf"
2. Memorandum of Understanding with Riverside County "305-130\_RPU\_LWCF\_MOU\_07-18-2017.pdf"

Cc: Todd M. Corbin, Public Utilities General Manager  
Daniel E. Garcia, Public Utilities Deputy General Manager  
George Hanson, Public Utilities Assistant General Manager



*City of Arts & Innovation*

July 1, 2020

To: Park District Board of Directors-Riverside County  
4080 Lemon Street, 5th Floor  
Riverside, California 92501  
[Parks-Planning@rivco.org](mailto:Parks-Planning@rivco.org)

Cc: Chamberlain, Shannon  
[snchamberlain@rivco.org](mailto:snchamberlain@rivco.org)

Subject: City of Riverside's support for conversion land in matter of Riverside Transmission Reliability Project (RTRP) - Land and Water Conservation Fund Act (LWCF)

The Honorable Board,

This is in reference to the Riverside Transmission Reliability Project (RTRP), specifically related to the conversion of Land and Water Conservation Fund (LWCF) Section 6(f)(3) lands to non-recreational uses that will be required for establishment of the easement for the 230kV transmission line across certain portions of the Hidden Valley Wildlife Area (HVWA). The City of Riverside is in concurrence with the proposed LWCF conversion outline below for the RTRP.

As you may be aware, The California Public Utilities Commission (CPUC) on March 12, 2020 approved the RTRP, a joint high-voltage utility project of Southern California Edison (SCE) and City of Riverside Public Utilities (RPU). The Project consists of approximately five (5) miles of overhead and approximately four (4) miles of underground 230 kV transmission line, as well as 69 kV sub-transmission lines and other facility upgrades.

The 230 kV transmission line component of the RTRP would cross portions of the HVWA, managed by the Riverside County Regional Park and Open Space District (District), on the south side of the Santa Ana River in several locations. The affected HVWA lands were funded, in part, under the LWCF, a federal program that provides funds to local and other agencies for the acquisition of public recreation land. The RTRP would affect approximately 10.8 acres of HVWA LWCF funded lands in three (3) general locations (see Attachment 1 – Project Location). These "Conversion Areas" would be permanently utilized for electrical transmission infrastructure.

The lands currently associated with LWCF that would be converted by the construction of the overhead 230 kV transmission line component of the project are within the HVWA. As the manager of HVWA, the District must apply for the conversion of these lands and also propose replacement property to mitigate for the loss of LWCF lands. The conversion and replacement application proposal is administered by the California Department of Parks and Recreation, Office of Grants and Local Services (OGALS) and would require approval by the National Park Service (NPS).

The Replacement Property is a similarly sized contiguous portion of a land parcel (#153240030-6), co-owned by the City of Riverside and Riverside County and located near the park's entrance north of Arlington Avenue. 10.8 acres of the Replacement Property would be designated as LWCF Section 6(f)(3) and incorporated into the HVWA to compensate for the loss of recreational lands within the park as a result of the RTRP. No zone change is proposed as a result of the Conversion Area and Replacement proposal.

The California Department of Fish and Wildlife (CDFW) and Riverside County own the parcels that are proposed to be crossed and converted to non-recreational lands by the 230 kV transmission line. CDFW has completed their internal Land Conversion Evaluation (LCE) process and approved the conversion as evaluated in the LCE on March 14, 2020.

The RPU, County of Riverside and SCE have worked closely on LWCF Conversion Area and Replacement proposal matters, have come to an agreement on the lands that will be converted as well as the proposed replacement property (Refer Attachment 2 - Memorandum of Understanding [MOU] with Riverside County), and have determined the steps to be taken to complete the conversion process with NPS and OGALS.

As per the MOU, RPU, County of Riverside and SCE agreed on:

- Project mapping which identifies the areas and size of conversion of LWCF lands
- Use of parcel #153-240-030, 16.35 acres in size and co-owned by the County and City of Riverside, for replacement property of the converted LWCF lands.
- The replacement property parcel #153-240-030 remaining in co-ownership by County and City of Riverside.

The LWCF process involves the following steps:

1. Identification of Replacement Property. (complete)
2. Prepare Proposal Development and Environmental Screening Form (PD/ESF). (complete)
3. CDFW Director signature on Land Conversion Evaluation (LCE). (complete)
4. District and Board approval of proposed conversion. (pending)
5. Submit PD/ESF to OGALS and National Park Service (NPS). (pending)  
-Please note that State Parks has already provided a review of the PD/ESF
6. Finalize PD/ESF with NPS. (pending)
7. Prepare NEPA document. Assume Environmental Assessment (EA). (pending)
8. Public review of NEPA document. (pending)
9. Prepare Finding of No Significant Impact (FONSI). (pending)
10. NPS decision on LWCF conversion. (pending)

Currently, the LWCF process awaits approval of proposed conversion from Riverside County Parks and County Supervisor so that the subsequent steps (5 through 10) in the process may proceed.

As a partial owner of the replacement property for LWCF Conversion, the City of Riverside agrees to the LWCF process above and is supporting of the proposed replacement property (parcel #153-240-030) receiving the LWCF Section 6(f)(3) designation.

The City of Riverside hereby requests the Riverside County Board to consider this letter of support from City of Riverside in their process of making a decision for approval of LWCF land conversion and the replacement property.

Please let us know if you need any assistance in your reviews and processing of approvals for the proposed conversion, replacement and expansion of the HVWA at the County level.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rusty Bailey', with a stylized flourish at the end.

Rusty Bailey  
Mayor, City of Riverside

Attachments:

1. Project Location and LWCF Section 6(f) Boundary Map "Attachment\_1-Map.pdf"
2. Memorandum of Understanding with Riverside County "305-130\_RPU\_LWCF\_MOU\_07-18-2017.pdf"

Cc: Todd M. Corbin, Public Utilities General Manager  
Daniel E. Garcia, Public Utilities Deputy General Manager  
George Hanson, Public Utilities Assistant General Manager

Using a separate sheet for narrative descriptions and explanations, address each item and question in the order it is presented, and identify each response with its item number such as Step 1-A1, A2; Step 3-B1; Step 6-A1, A29; etc.

**Step 1. Type of LWCF Proposal**

**New Project Application**

- Acquisition** Go to Step A       **Development** Go to Step 2B       **Combination (Acquisition and Development)** Go to Step 2C

X **New Project Application**

- Increase in scope or change in scope from original agreement.** Complete Steps 3A, and 5 through 7.  
 **6(f) conversion proposal.** Complete Steps 3B, and 5 through 7.  
 **Request for public facility in a Section 6(f) area.** Complete Steps 3C, and 5 through 7.

**Request for temporary non-conforming use in a Section 6(f) area.** Complete Steps 4A, and 5 through 7.

**Request for significant change in use/intent of original LWCF application.** Complete Steps 4B, and 5 through 7.

**Request to shelter existing/new facility within a Section 6(f) area regardless of funding source.**  
Complete Steps 4C, and 5 through 7.

**Step 2. New Project Application (See LWCF Manual for guidance)**

**A. For an Acquisition Project**

1. Provide a brief narrative about the proposal that provides the reasons for the acquisition, the number of acres to be acquired with LWCF assistance, and a description of the property. Describe and quantify the types of existing resources and features on the site (for example, 50 acres wetland, 2,000 feet beachfront, 200 acres forest, scenic views, 100 acres riparian, vacant lot, special habitat, any unique or special features, recreation amenities, historic/cultural resources, hazardous materials/contamination history, restrictions, institutional controls, easements, rights-of-way, above ground/underground utilities, including wires, towers, etc.). N/A
2. How and when will the site be made open and accessible for public outdoor recreation use (signage, entries, parking, site improvements, allowable activities, etc.)? N/A
3. Describe development plans for the proposal for the site(s) for public outdoor recreation use within the next three (3) years. N/A
4. SLO must complete the State Appraisal/Waiver Valuation Review form in Step 7 certifying that the appraisal(s) has been reviewed and meets the "Uniform Appraisal Standards for Federal Land Acquisitions" or a waiver valuation was approved per 49 CFR 24.102(c)(2)(ii). State should retain copies of the appraisals and make them available if needed. N/A
5. Address each item in "D" below.

**B. For a Development Project**

1. Describe the physical improvements and/or facilities that will be developed with federal LWCF assistance, including a site sketch depicting improvements, where and how the public will access the site, parking, etc. Indicate entrances on 6(f) map. Indicate to what extent the project involves new development, rehabilitation, and/or replacement of existing facilities. N/A
2. When will the project be completed and open for public outdoor recreation use? N/A
3. Address each item in "D" below.

**C. For a Combination Project**

1. For the acquisition part of the proposal: N/A
  - a. Provide a brief narrative about the proposal that provides the reasons for the acquisition, number of acres to be acquired with LWCF assistance, and describes the property. Describe and quantify the types of existing resources and features on the site (for example, 50 acres wetland, 2,000 feet beachfront, 200 acres forest, scenic views, 100 acres riparian, vacant lot, special habitat, any unique or special features, recreation amenities, historic/cultural resources, hazardous materials/contamination history, restrictions, institutional controls, easements, rights-of-way, above ground/underground utilities, including wires, towers, etc.)
  - b. How and when will the site be made open and accessible for public outdoor recreation use (signage, entries, parking, site improvements, allowable activities, etc.)?
  - c. Describe development plans for the proposed for the site(s) for public outdoor recreation use within the next three (3) years.  
SLO must complete the State Appraisal/Waiver Valuation Review form in Step 7 certifying that the appraisal(s) has been reviewed and meets the "Uniform Appraisal Standards for Federal Land Acquisitions" or a waiver valuation was approved per 49 CFR 24.102(c)(2)(ii). State should retain copies of the appraisals and make them available if needed.
  - d.
2. For the development part of the proposal: N/A



- a. Describe the physical improvements and/or facilities that will be developed with federal LWCF assistance, including a site sketch depicting improvements, where and how the public will access the site, parking, etc. Indicate entrances on 6(f) map. Indicate to what extent the project involves new development, rehabilitation, and/or replacement of existing facilities.
- b. When will the project be completed and open for public outdoor recreation use?

3. Address each item in "D" below.


**D. For a Combination Project-**

**SEE ATTACHED PROJECT DESCRIPTION-ENVIRONMENTAL SCREENING FORM SUPPLEMENTAL INFORMATION**

- 1. Will this proposal create a new public park/recreation area where none previously existed and is not an addition to an existing public park/recreation area? Yes  (go to #3) No  (go to #2) **N/A**
- 2. a. What is the name of the pre-existing public area that this new site will be added to? **N/A**  
 b. Is the pre-existing public park/recreation area already protected under Section 6(f)? Yes  No   
 If no, will it now be included in the 6(f) boundary? Yes  No
- 3. What will be the name of this new public park/recreation area? **N/A**
- 4. a. Who will hold title to the property assisted by LWCF? Who will manage and operate the site(s)? **N/A**  
 b. What is the sponsor's type of ownership and control of the property?  
 \_\_\_\_\_ Fee simple ownership  
 \_\_\_\_\_ Less than fee simple. Explain:  
 \_\_\_\_\_ Lease. Describe lease terms including renewable clauses, # of years remaining on lease, etc.  
 Who will lease area? Submit copy of lease with this PD/ESF. (See LWCF Manual for program restrictions for leases and further guidance)
- 5. Describe the nature of any rights-of-way, easements, reversionary interests, etc. to the Section 6(f) park area? Indicate the location on 6(f) map. Do parties understand that a Section 6(f) conversion may occur if private or non-recreation activities occur on any pre-existing right-of-way, easement, leased area? **N/A**
- 6. Are overhead utility lines present, and if so, explain how they will be treated per LWCF Manual. **N/A**
- 7. As a result of this project, describe **new** types of outdoor recreation opportunities and capacities, and short and long term public benefits. **See Attached PD-ESF Supplemental Information**
- 8. Explain any existing non-recreation and non-public uses that will continue on the site(s) and/or proposed for the future within the 6(f) boundary. **See Attached PD-ESF Supplemental Information**
- 9. Describe the planning process that led to the development of this proposal. Your narrative should address:
  - a. How was the interested and affected public notified and provided opportunity to be involved in planning for and developing your LWCF proposal? Who was involved and how were they able to review the **completed** proposal, including any state, local, federal agency professionals, subject matter experts, members of the public and Indian Tribes. Describe any public meetings held and/or formal public comment periods, including dates and length of time provided for the public to participate in the planning process and/or to provide comments on the completed proposal. **See Attached PD-ESF Supplemental Information**
  - b. What information was made available to the public for review and comment? Did the sponsor provide written responses addressing the comments? If so, include responses with this PD/ESF submission. **See Attached PD-ESF Supplemental Information**
- 10. How does this proposal implement statewide outdoor recreation goals as presented in the Statewide Comprehensive Outdoor Recreation Plan (SCORP) (include references), and explain why this proposal was selected using the State's Open Project Selection Process (OPSP). **See Attached PD-ESF Supplemental Information**
- 11. List all source(s) and amounts of financial match to the LWCF federal share of the project. The value of the match can consist of cash, donation, and in-kind contributions. The federal LWCF share and financial matches must result in a viable outdoor recreation area and not rely on other funding not mentioned here. Other federal resources may be used as a match if specifically authorized by law.

Source	Type of Match	Amount

- 12. Is this LWCF project scope part of a larger effort not reflected on the SF-424 (Application for Federal Assistance) and grant agreement? If so, briefly describe the larger effort, funding amount(s) and source(s). This will capture information about partnerships and how LWCF plays a role in leveraging funding for projects beyond the scope of this federal grant.
- 13. List all required federal, state, and local permits/approvals needed for the proposal and explain their purpose and status.

**Proceed to Steps 5 through 7** 

**Step 3. Project Amendment** (See LWCF Manual for guidance)

**A. Increase/Change in Project Scope** N/A

1. **For Acquisition Projects:** To acquire additional property that was not described in the original project proposal and NEPA documentation, follow Step 2A-Acquisition Project and 2D.
2. **For Development Projects:** To change the project scope for a development project that alters work from the original project scope by adding elements or enlarging facilities, follow Step 2B-Development Project and 2D.
3. **For Combination Projects:** Follow Step 2C as appropriate.

**B. Section 6(f)(3) Conversion Proposal**

Prior to developing your Section 6(f)(3) conversion proposal, you must consult the LWCF Manual and 36 CFR 59.3 for complete guidance on conversions. Local sponsors must consult early with the State LWCF manager when a conversion is under consideration or has been discovered. States must consult with their NPS-LWCF manager as early as possible in the conversion process for guidance and to sort out and discuss details of the conversion proposal to avoid mid-course corrections and unnecessary delays. **A critical first step is for the State and NPS to agree on the size of the Section 6(f) park land impacted by any non-recreation, non-public use, especially prior to any appraisal activity.** Any previous LWCF project agreements and actions must be identified and understood to determine the actual Section 6(f) boundary.

The Section 6(f)(3) conversion proposal including the required NEPA environmental review documents (CE recommendation or an EA document) must focus on the loss of public outdoor recreation park land and recreational usefulness, and its replacement per 36 CFR 59, and not the activities precipitating the conversion or benefits thereof, such as the impacts of constructing a new school to relieve overcrowding or constructing a hotel/restaurant facility to stimulate the local economy. Rather, the environmental review must: 1) focus on "resource impacts" as indicated on the ESF (Step 6), including the loss of public park land and recreation opportunities (ESF A-15), and 2) the impacts of creating new replacement park land and replacement recreation opportunities. A separate ESF must be generated for the converted park area and each replacement site. Section 6(f)(3) conversions always have more than minor impacts to outdoor recreation (ESF A-15) as a result of loss of parkland requiring an EA, except for "small" conversions as defined in the LWCF Manual Chapter 8.

For NPS review and decision, the following elements are required to be included in the State's completed conversion proposal to be submitted to NPS:

1. A letter of transmittal from the SLO recommending the proposal.
2. A detailed explanation of the sponsor's need to convert the Section 6(f) parkland including all efforts to consider other practical alternatives to this conversion, how they were evaluated, and the reasons they were not pursued.
3. An explanation of how the conversion is in accord with the State Comprehensive Outdoor Recreation Plan (SCORP).
4. Completed "State Appraisal/Waiver Valuation Review form in Step 7 for each of the converted and replacement parcels certifying that the appraisals meet the "Uniform Appraisal Standards for Federal Land Acquisitions." States must retain copies of the appraisals/waiver valuations and make them available for review upon request.
5. For the park land proposed for conversion, a detailed description including the following:
  - a. Specific geographic location on a map, 9-digit zip code, and name of park or recreation area proposed for conversion.
  - b. Description of the area proposed for the conversion including the acreage to be converted and any acreage remaining. For determining the size of the conversion, consider not only the physical footprint of the activity precipitating the conversion, but how the precipitating activity will impact the entire 6(f) park area. **In many cases the size of the converted area is larger than the physical footprint.** Include a description of the recreation resources, facilities, and recreation opportunities that will be impacted, displaced or lost by the proposed conversion. For proposals to partially convert a Section 6(f) park area, the remaining 6(f) park land must remain recreationally viable and not be impacted by the activities that are precipitating the conversion. If it is anticipated that the precipitating activities impact the remaining Section 6(f) area, the proposed area for the conversion should be expanded to encompass all impacted park land.
  - c. Description of the community and population served by the park, including users of the park and uses.
  - d. For partial conversions, a revised 6(f) map clearly indicating both the portion that is being converted and the portion remaining intact under Section 6(f).
6. For each proposed replacement site:
  - a. Specific geographic location on a map, 9-digit zip code, and geographical relationship of converted and replacement sites. If site will be added to an existing public park/outdoor recreation area, indicate on map.
  - b. Description of the site's physical characteristics and resource attributes with number and types of resources and features on the site, for example, 15 acres wetland, 2,000 feet beachfront, 50 acres forest, scenic views, 75 acres riparian, vacant lot, special habitat, any unique or special features, structures, recreation amenities, historic/cultural resources, hazardous materials/contamination history, restrictions, institutional controls, easements, rights-of-way, overhead/underground utilities including overhead wires, towers, etc.
  - c. Identification of the owner of the replacement site and its recent history of use/function up to the present.

- d. Detailed explanation of how the proposed replacement site is of reasonably equivalent usefulness and location as the property being converted, including a description of the recreation needs that will be met by the new replacement parks, populations to be served, and new outdoor recreation resources, facilities, and opportunities to be provided.
  - e. Identification of owner and manager of the new replacement park?
  - f. Name of the new replacement park. If the replacement park is added to an existing public park area, will the existing area be included within the 6(f) boundary? What is the name of the existing public park area?
  - g. Timeframe for completing the new outdoor recreation area(s) to replace the recreation opportunity lost per the terms of conversion approval and the date replacement park(s) will be open to the public.
  - h. New Section 6(f) map for the new replacement park.
7. NEPA environmental review, including NHPA Section 106 review, for both the converted and replacement sites in the same document to analyze how the converted park land and recreational usefulness will be replaced. Except for "small" conversions (see LWCF Manual Chapter 8), conversions usually require an EA.

**Proceed to Steps 5 through 7** 

**C. Proposal for a Public Facility in a Section 6(f) Area N/A**

Prior to developing this proposal, you must consult the LWCF Manual for complete guidance. In summary, NPS must review and decide on requests to construct a public indoor and/or non-recreation facility within a Section 6(f) area. In certain cases NPS may approve the construction of public facilities within a Section 6(f) area where it can be shown that there will be a net gain in outdoor recreation benefits and enhancements for the entire park. In most cases, development of a non-recreation public facility within a Section 6(f) area constitutes a conversion. For NPS review, the State/sponsor must submit a proposal to NPS under a letter of transmittal from the SLO that:

1. Describes the purpose and all proposed uses of the public facility such as types of programming, recreation activities, and special events including intended users of the new facility and any agency, organization, or other party to occupy the facility. Describe the interior and exterior of the facility, such as office space, meeting rooms, food/beverage area, residential/lodging area, classrooms, gyms, etc. Explain how the facility will be compatible with the outdoor recreation area. Explain how the facility and associated uses will significantly support and enhance existing and planned outdoor recreation resources and uses of the site, and how outdoor recreation use will remain the primary function of the site. (The public's outdoor recreation use must continue to be greater than that expected for any indoor use, unless the site is a single facility, such as a swimming pool, which virtually occupies the entire site.)
2. Indicates the exact location of the proposed public facility and associated activities on the site's Section 6(f) map. Explain the design and location alternatives considered for the public facility and why they were not pursued.
3. Explains who will own and/or operate and maintain the facility? Attach any 3<sup>rd</sup> party leases and operation and management agreements. When will the facility be open to the public? Will the facility ever be used for private functions and closed to the public? Explain any user or other fees that will be instituted, including the fee structure.
4. Includes required documents as a result of a completed NEPA process (Steps 5 – 7).

**Proceed to Steps 5 through 7** 

**Step 4. Proposals for Temporary Non-Conforming Use, Significant Change in Use, and Sheltering Facilities**  
(See LWCF Manual for guidance)

**A. Proposal for Temporary Non-Conforming Use N/A**

Prior to developing this proposal, you must consult the LWCF Manual for complete guidance. NPS must review and decided on requests for temporary uses that do not meet the requirements of allowable activities within a Section 6(f) area. A temporary non-conforming use is limited to a period of six months (180 days) or less. Continued use beyond six-months will not be considered temporary, and may result in a Section 6(f)(3) conversion of use requiring the replacement of converted parkland. For NPS review, describe the temporary non-conforming use (activities other than public outdoor recreation) in detail including the following information:

1. A letter of transmittal from the SLO recommending the proposal.
2. Describe in detail the proposed temporary non-conforming use and all associated activities, why it is needed, and alternative locations that were considered and why they were not pursued.
3. Explain length of time needed for the temporary non-conforming use and why.
4. Describe the size of the Section 6(f) area affected by the temporary non-conforming use activities and expected impacts to public outdoor recreation areas, facilities and opportunities. Explain efforts to keep the size of the area impacted to a minimum. Indicate the location of the non-conforming use on the site's 6(f) map.
5. Describe any anticipated temporary/permanent impacts to the Section 6(f) area and how the sponsor will mitigate them during and after the non-conforming use ceases.
6. Consult the LWCF Manual for additional requirements and guidelines before developing the proposal.

**Proceed to Steps 5 through 7** 

**B. Proposal for Significant Change in Use N/A**

Prior to developing the proposal, you must consult the LWCF Manual for complete guidance. NPS approval must be obtained prior to any change from one eligible use to another when the proposed use would significantly contravene the original plans or intent for the area outlined in the original LWCF application for federal assistance. Consult with NPS for early determination on the need for a formal review. NPS approval is only required for proposals that will significantly change the use of a LWCF-assisted site (e.g., from passive to active recreation). The proposal must include and address the following items:

1. A letter of transmittal from the SLO recommending the proposal.
2. Description of the proposed changes and how they significantly contravene the original plans or intent of LWCF agreements.
3. Explanation of the need for change in use and how the change is consistent with local plans and the SCORP.
4. Consult the LWCF Manual for additional requirements and guidelines before developing the proposal.

**Proceed to Steps 5 through 7** 

**C. Proposal for Sheltering Facilities N/A**

Prior to developing this proposal, you must consult the LWCF Manual for complete guidance. NPS must review and decide on all proposals to shelter an existing outdoor recreation facility or construct a new sheltered recreation facility within a Section 6(f) area regardless of funding source. The proposal must demonstrate that there is an increased benefit to public recreation opportunity. Describe the sheltering proposal in detail, including the following:

1. A letter of transmittal from the SLO recommending the proposal.
2. Describe the proposed sheltered facility, how it would operate, how the sheltered facility will include recreation uses that could typically occur outdoors, and how the primary purpose of the sheltered facility is recreation.
3. Explain how the sheltered facility would not substantially diminish the outdoor recreation values of the site including how the sheltered facility will be compatible and significantly supportive of the outdoor recreation resources present and/or planned.
4. Explain how the sheltered facility will benefit the total park's outdoor recreation use.
5. Describe efforts provided to the public to review the proposal to shelter the facility and has local support.
6. Document that the sheltered facility will be under the control and tenure of the public agency which sponsors and administers the original park area.
7. Consult the LWCF Manual for additional requirements and guidelines before developing the proposal.

**Proceed to Steps 5 through 7** 

**Step 5. Summary of Previous Environmental Review (including E.O. 12372 - Intergovernmental Review)**


To avoid duplication of effort and unnecessary delays, describe any prior environmental review undertaken at any time and still viable for this proposal or related efforts that could be useful for understanding potential environmental impacts. Consider previous local, state, federal (e.g. HUD, EPA, USFWS, FHWA, DOT) and any other environmental reviews. At a minimum, address the following:

**See Attached PD-ESF Supplemental Information**

1. Date of environmental review(s), purpose for the environmental review(s) and for whom they were conducted.
2. Description of the proposed action and alternatives.
3. Who was involved in identifying resource impact issues and developing the proposal including the interested and affected public, government agencies, and Indian tribes?
4. Environmental resources analyzed and determination of impacts for proposed actions and alternatives.
5. Any mitigation measures to be part of the proposed action.
6. Intergovernmental Review Process (Executive Order 12372):  
Does the State have an Intergovernmental Review Process? Yes  No . If "Yes", has the LWCF Program been selected for review under the State Intergovernmental Review Process? Yes  No . If "Yes", was this proposal reviewed by the appropriate State, metropolitan, regional and local agencies, and if so, attach any information and comments received about this proposal. If proposal was not reviewed, explain why not.
7. Public comment periods (how long, when in the process, who was invited to comment) and agency response.
8. Any formal decision and supporting reasons regarding degree of potential impacts to the human environment.
9. Was this proposed LWCF federal action and/or any other federal actions analyzed/reviewed in any of the previous environmental reviews? If so, what was analyzed and what impacts were identified? Provide specific environmental review document references.

Use resource impact information generated during previous environmental reviews described above and from recently conducted site inspections to complete the Environmental Screening Form (ESF) portion of this PD/ESF under Step 6. Your ESF responses should indicate your proposal's potential for impacting each resource as determined in the previous environmental review(s), and include a reference to where the analysis can be found in an earlier environmental review document. If the previous environmental review documents contain proposed actions to mitigate impacts, briefly summarize the mitigation for each resource as appropriate. The

appropriate references for previous environmental review document(s) must be documented on the ESF, and the actual document(s) along with this PD/ESF must be included in the submission for NPS review.

**Proceed to Steps 6 through 7** 

### Step 6. Environmental Screening Form (ESF)

This portion of the PD/ESF is a working tool used to identify the level of environmental documentation which must accompany the proposal submission to the NPS. By completing the ESF, the project sponsor is providing support for its recommendation in Step 7 that the proposal either:

1. meets criteria to be categorically excluded (CE) from further NEPA review and no additional environmental documentation is necessary; or
2. requires further analysis through an environmental assessment (EA) or an environmental impact statement (EIS).

An ESF alone does not constitute adequate environmental documentation unless a CE is recommended. If an EA is required, the EA process and resulting documents must be included in the proposal submission to the NPS. If an EIS may be required, the State must request NPS guidance on how to proceed.

The scope of the required environmental analysis will vary according to the type of LWCF proposal. For example, the scope for a new LWCF project will differ from the scope for a conversion. Consult the LWCF Manual for guidance on defining the scope or extent of environmental analysis needed for your LWCF proposal. As early as possible in your planning process, consider how your proposal/project may have direct, indirect and cumulative impacts on the human environment for your type of LWCF action so planners have an opportunity to design alternatives to lessen impacts on resources, if appropriate. When used as a planning tool in this way, the ESF responses may change as the proposal is revised until it is ready for submission for federal review. Initiating or completing environmental analysis after a decision has been made is contrary to both the spirit and letter of the law of the NEPA.

The ESF should be completed with input from resource experts and in consultation with relevant local, state, tribal and federal governments, as applicable. The interested and affected public should be notified of the proposal and be invited to participate in scoping out the proposal (see LWCF Manual Chapter 4). At a minimum, 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.

At the time of proposal submission to NPS for federal review, the completed ESF must justify the NEPA pathway that was followed: CE recommendation, production of an EA, or production of an EIS. The resource topics and issues identified on the ESF for this proposal must be presented and analyzed in an attached EA/EIS. Consult the LWCF Manual for further guidance on LWCF and NEPA. The ESF contains two parts that must be completed:

#### Part A. Environmental Resources

#### Part B. Mandatory Criteria

**Part A:** For each environmental resource topic, choose an impact estimate level (none, negligible, minor, exceeds minor) that describes the degree of potential negative impact for each listed resource that may occur directly, indirectly and cumulatively as a result of federal approval of your proposal. For each impacted resource provide a brief explanation of how the resource might be affected, how the impact level was determined, and why the chosen impact level is appropriate. If an environmental review has already been conducted on your proposal and is still viable, include the citation including any planned mitigation for each applicable resource, and choose an impact level as mitigated. If the resource does not apply to your proposal, mark NA in the first column. Add any relevant resources (see A.24 on the ESF) if not included in the list.

Use a separate sheet to briefly clarify how each resource could be adversely impacted; any direct, indirect, and cumulative impacts that may occur; and any additional data that still needs to be determined. Also explain any planned mitigation already addressed in previous environmental reviews.

See Attached PD-ESF Supplemental Information

**Part B:** This is a list of mandatory impact criteria that preclude the use of categorical exclusions. If you answer "yes" or "maybe" for any of the mandatory criteria, you must develop an EA or EIS regardless of your answers in Part A. Explain all "yes" and "maybe" answers on a separate sheet.

<b>A. ENVIRONMENTAL RESOURCES</b> Indicate potential for adverse impacts. Use a separate sheet to clarify responses per instructions for Part A on page 9.	<b>Not Applicable -</b> Resource does not exist	<b>No/Negligible Impacts -</b> Exists but no or negligible impacts	<b>Minor Impacts</b>	<b>Impacts Exceed Minor</b> EA/EIS required	<b>More Data Needed to Determine Degree of Impact</b> EA/EIS required
1. Geological resources: soils, bedrock, slopes, streambeds, landforms, etc.	(See Attached PD-ESF Supplemental Information)				
2. Air quality					
3. Sound (noise impacts)					
4. Water quality/quantity					
5. Stream flow characteristics					
6. Marine/estuarine					
7. Floodplains/wetlands					
8. Land use/ownership patterns; property values; community livability					
9. Circulation, transportation					
10. Plant/animal/fish species of special concern and habitat; state/federal listed or proposed for listing					
11. Unique ecosystems, such as biosphere reserves, World Heritage sites, old growth forests, etc.					
12. Unique or important wildlife/ wildlife habitat					
13. Unique or important fish/habitat					
14. Introduce or promote invasive species (plant or animal)					
15. Recreation resources, land, parks, open space, conservation areas, rec. trails, facilities, services, opportunities, public access, etc. <i>Most conversions exceed minor impacts. See Step 3.B</i>					
16. Accessibility for populations with disabilities					
17. Overall aesthetics, special characteristics/ features					
18. Historical/cultural resources, including landscapes, ethnographic, archeological, structures, etc. Attach SHPO/THPO determination.					
19. Socioeconomics, including employment, occupation, income changes, tax base, infrastructure					
20. Minority and low-income populations					
21. Energy resources (geothermal, fossil fuels, etc.)					
22. Other agency or tribal land use plans or policies					
23. Land/structures with history of contamination/hazardous materials even if remediated					
24. Other important environmental resources to address.					

<b>B. Mandatory Critical</b> <i>If your LWCF proposal is approved, would it...</i>	<b>Yes</b>	<b>No</b>	<b>To Be Determined</b>
1. Have significant impacts on public health or safety?		X	
2. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands, wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (E.O. 11990); floodplains (E.O 11988); and other ecologically significant or critical areas.		X	
3. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA section 102(2)(E)]?		X	
4. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?		X	
5. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?		X	
6. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?		X	
7. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office. (Attach SHPO/THPO Comments)		X	
8. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species.		X	
9. Violate a federal law, or a state, local, or tribal law or requirement imposed for the protection of the environment?		X	
10. Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898)?		X	
11. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007)?		X	
12. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area, or actions that may promote the introduction, growth, or expansion of the range of		X	

<b>Environmental Reviewers</b>
The following individual(s) provided input in the completion of the environmental screening form. List all reviewers including name, title, agency, field of expertise. Keep all environmental review records and data on this proposal in state compliance file for any future program review and/or audit. The ESF may be completed as part of a LWCF pre-award site inspection if conducted in time to contribute to the environmental review process for the proposal.
1. <b><u>See Attached PD-ESF Supplemental Information</u></b>
2.
3.
<b>The following individuals conducted a site inspection to verify field conditions.</b> <i>List name of inspector(s), title, agency, and date(s) of inspection.</i>
1. Barbara Baker
2. Karen Sims
3.
<b>State may require signature of LWCF sub-recipient applicant here:</b> _____ <b>Date:</b> _____

<b>Step 7. Recommended NEPA Pathway and State Appraisal/Waiver Valuation</b>
First, consult the NPS list of Categorical Exclusions (CEs). If you find your action in the CE list and you have determined in Step 6A that impacts will be minor or less for each applicable environmental resource on the ESF and you answered "no" to all of the "Mandatory Criteria" questions in Step 6B, the proposal qualifies for a CE. Complete the following "State LWCF Environmental Recommendations" box indicating the CE recommendation.
If you find your action in the CE list and you have determined in Step 6A that impacts will be greater than minor or that more data is needed for any of the resources and you answered "no" to all of the "Mandatory Criteria" questions, your environmental review team may choose to do additional analysis to determine the context, duration, and intensity of the impacts of your project or may wish to revise the proposal to minimize impacts to meet the CE criteria. If impacts remain at the greater than minor level, the State/sponsor must prepare an EA for the proposal. Complete the following "State Environmental Recommendations" box indicating the need for an EA.

If you do not find your action in the CE list, regardless of your answers in Step 6, you must prepare an EA or EIS. Complete the following "State Environmental Recommendations" box indicating the need for an EA or EIS.

**State NEPA Pathway Recommendation**

- I certify that a site inspection was conducted for each site involved in this proposal and to the best of my knowledge, the information provided in this LWCF Proposal Description and Environmental Screening Form (PD/ESF) is accurate based on available resource data. All resulting notes, reports and inspector signatures are stored in the state's NEPA file for this proposal and are available upon request. On the basis of the environmental impact information for this LWCF proposal as documented in this LWCF PD/ESF with which I am familiar, I recommend the following LWCF NEPA pathway:
- This proposal qualifies for a Categorical Exclusion (CE).
    - CE Item #:
    - Explanation:
  - This proposal requires an Environmental Assessment (EA) which is attached and has been produced by the State/sponsor in accordance with the LWCF Program Manual.
  - This proposal may require an Environmental Impact Statement (EIS). NPS guidance is requested per the LWCF Program Manual.

Reproduce this certificate as necessary. Complete for each LWCF appraisal or waiver valuation.

**State Appraisal/Waiver Valuation Review**

<b>Property Address:</b>	\$ _____	<b>Date of appraisal transmittal letter/waiver:</b>	_____
<b>Real property value:</b>	_____	<b>Effective date of value:</b>	_____
<b>I certify that:</b>	<input type="checkbox"/> A State-certified Review Appraiser has <u>reviewed</u> the appraisal and has determined that it was prepared in conformity with the Uniform Appraisal Standards for Federal Land Acquisitions.		
	OR		
	<input type="checkbox"/> The State has reviewed and approved a <u>waiver valuation</u> for this property per 49 CFR 24.102(c)(2)(ii).		

<b>SLO/ASLO Original Signature:</b> _____	<b>Date:</b> _____	
Typed Name	Title	Agency
_____	_____	_____



## NOTICES

### Paperwork Reduction Act Statement

In accordance with the Paperwork Reduction Act (44 U.S.C. 3501), please note the following. This information collection is authorized by the Land and Water Conservation Fund Act of 1965 (54 U.S.C. 2003 et seq.). Your response is required to obtain or retain a benefit. We use this information to obtain descriptive and environmental information about the proposal. We may not conduct or sponsor and you are not required to respond to a collection of information unless it displays a currently valid Office of Management and Budget control number. OMB has assigned control number 1024-0031 to this collection.

### Estimated Burden Statement

Completion times vary widely depending on the use of the form, from approximately 30 minutes to complete the cover page only to 500 hours for a difficult conversion of use. We estimate that the average completion time for this form is 8 hours for an application, 2 hours for an amendment, and 112 hours for a conversion of use, including the time necessary to review instructions gather data and review the form. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Information Collection Officer, National Park Service, 12201 Sunrise Valley Drive, MS-242 Rm. 2C114, Reston, VA 20192. Please do not send your completed form to this address; but rather to the address at the top of the form.

December 27, 2019

# **RIVERSIDE TRANSMISSION RELIABILITY PROJECT**

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**Hidden Valley Wildlife Area**

**LWCF Section 6(f)(3) Conversion Proposal**

*Project Description-Environmental Screening Form Supplemental Information*

**PROJECT NUMBER:**  
124462

**PROJECT CONTACT:**  
Mike Strand  
**EMAIL:**  
[Mike.Strand@powereng.com](mailto:Mike.Strand@powereng.com)  
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## ACRONYMS AND ABBREVIATIONS

AMSL	Above mean sea level
APE	Area of Potential Effects
APLIC	Avian Power Line Interaction Committee
BACT	Best Available Control Technology
BMP	Best Management Practice
BUOW	Western burrowing owl
CAISO	California Independent System Operator
CARB	California Air Resources Board
CDPR	California Department of Pest Regulation
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CPAD	California Protected Area Database
CPUC	California Public Utilities Commission
CSA	California Special Animal
CSC	California Special Concern Species
CSP	California Special Plant
CWA	Clean Water Act
DEIR	Draft Environmental Impact Report
DG	distributed generation
DPM	Diesel Particulate Matter
EA	Environmental Assessment
EIC	Eastern Information Center
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESF	Environmental Screening Form
FAA	Federal Aviation Administration
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GIS	Geographic Information System
HUD	United States Department of Housing and Urban Development
kV	kilovolt
LWCF	Land and Water Conservation Fund
MBTA	Migratory Bird Treaty Act
MM	mitigation measure
MSHCP	Multiple Species Habitat Conservation Plan