



City of  
**Chino Hills**

December 17, 2007

Ruth Coleman, Director  
California Department of Parks and Recreation  
P.O. Box 942896  
Sacramento, CA 94296-0001

Re: Tehachapi Renewable Transmission Project ("TRTP" or "Project")

Dear Ms. Coleman:

I am writing this letter to ensure that you are fully aware of the City of Chino Hills' ("City's") proposed alternative routes for the Tehachapi Renewable Transmission Project ("TRTP"). The City has been attempting to discuss these alternatives with the California Department of Parks and Recreation ("State Parks") to determine whether there is an alternative that would result in a "win-win" solution for the City and State Parks. Unfortunately, we were recently informed by State Parks representatives that State Parks sees no need for further meetings or discourse regarding the Project. Therefore, this letter is also written to urge that your Department continue to meet with the City to discuss these alternatives. The City believes that additional mitigation measures could be developed during the environmental review of the project by the California Public Utilities Commission ("CPUC") under the California Environmental Quality Act ("CEQA"), and that State Parks' cooperation with the other parties in the development of these mitigation measures will be essential to optimize the outcome of the TRTP permitting process in terms of its eventual impact on Chino Hills State Park.

As you are aware, the City has been exploring alternative routes for the TRTP through Chino Hills State Park ("Park"). The City is engaging in this process in the hopes of avoiding the tremendous and unprecedented negative impacts of the original transmission line route proposed by Southern California Edison ("SCE"). SCE proposed that a double-circuit 500 kV transmission line with 198 foot high towers be built through three miles of densely populated Chino Hills' residential neighborhoods. The tall towers would be built dangerously close, potentially 75 feet, from our residents' backyards. Further, more than 3,000 residents, including children, would live within 500 feet of these lines. Tens of thousands of residents would also be adversely impacted by the overwhelming negative aesthetic impact the Project would have because of the close proximity of their homes to these same transmission lines and towers. (See attached Exhibit 1 depicting a before and after (simulated) view of a transmission line and tower on one of the City's neighborhoods as currently proposed by SCE.)

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We appreciate that State Parks is opposed to adding transmission lines to the Park and is very protective of the Park and the wildlife habitats within it. The City, which includes most of the Park within its City limits, also wants to protect the Park and other undeveloped open space and believes that this can be done while also protecting the City's residents. To this end, the City has spent significant time and money to develop a number of alternatives to SCE's proposal for discussion.

Of the alternative routes developed, the City believes that one in particular will actually *improve* the aesthetics of the Park because it would result in the **net removal from the Park of about 2 miles of transmission lines, 4 transmission towers, 14 acres of transmission rights-of-way and eliminates the construction of 15 miles of transmission lines and towers.** This alternative, which is referred to as Revised Alternative C, also helps protect the Water Canyon Natural Preserve, the area of highest biological resource sensitivity in the Park. This is because under this alternative **all existing 500 kV transmission structures (lines and towers) and 12 acres of right-of-way would be removed from the Preserve.**

The most important feature of Revised Alternative C is that it relocates some existing transmission lines into less sensitive areas and relocates other existing transmission lines completely outside the Park. By reducing the length and impact of these transmission lines, this alternative appears to accomplish certain specific goals set forth in the Chino Hills State Park General Plan (see page 65) such as "to reduce the negative impacts of utility easements in the Park" and to "consolidate easements into fewer or smaller corridors." The City believes that if State Parks does not engage in further communications with the City regarding Revised Alternative C, then State Parks would be missing a significant opportunity to offer constructive suggestions regarding this alternative (as well as other alternatives) and could lose a valuable opportunity to further the goals of its own General Plan for Chino Hills State Park.

As a public servant for more than forty years, I believe that the public agencies involved in and affected by the Project have an obligation to discuss the Project and explore how to best mitigate the Project's impacts by creating an alternative that achieves the greatest public benefit. To this end, set forth below is a review of the communications between the City and State Parks that have transpired to date as well as an outline of some of the Project alternatives that have been and are continuing to be explored.

### **City's Concerns with the Proposed Project and Summary of Communications with State Parks**

In May of this year, the City, with the help of outside consultants, began reviewing the Project. As explained above, the City is concerned that the Project as proposed by SCE would place 500 kV double circuit transmission towers and lines through three miles of densely populated

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residential neighborhoods in the City. The proposed transmission towers are 60 feet wide and would reach heights up to 198 feet. They would be located within right-of-ways that are as narrow as 150 feet wide. The Project, if constructed as proposed, would result in: (1) the transmission towers being within approximately 75 feet of many residential properties, (2) over 1,000 residential structures being within 500 feet of the transmission lines, and (3) tens of thousands of residents being impacted by the visual impact of the lines. Exhibit 1 is a visual simulation of the potential impact on one Chino Hills' neighborhood resulting from the currently proposed Project.

Based upon the above impacts to its residents, the City subsequently developed a proposed alternative for the California Public Utilities Commission ("CPUC") to study that provides for the transmission lines to be constructed within an existing transmission line right-of-way located in the Chino Hills State Park. The City worked with SCE for purposes of determining whether, as a preliminary matter, the alternative was technically feasible. The City spent a significant amount of time and resources to develop a written proposal including diagrams and pictures for purposes of meeting with the CPUC, State Parks and state legislators.

On September 10, the City's various consultants, special counsel and I met with you and other representatives from State Parks to initially discuss the alternative. The purpose of the meeting was to make sure that State Parks was informed very early on in the process regarding the City's concerns and its proposed alternative. You expressed the general sentiment that you did not favor additional transmission lines being located in the Park but directed the City to meet with State Parks General Counsel and various local employees of State Parks. The City attempted to arrange such a meeting for several weeks but then was informed by State Park's General Counsel that the meeting would take place jointly with CPUC and SCE representatives. This meeting was finally held on November 15, in San Francisco.

At the November 15, meeting the City presented its original alternative route along with several other alternative routes for the Project. The City, in coordination with SCE, had developed other alternatives for discussion purposes in an attempt to address concerns that State Parks expressed to the CPUC. During this meeting SCE expressed a willingness to study the removal of a number of its current transmission lines in the Park so as to ultimately reduce the total linear footage as well as square footage of rights of way located within the Park. The City and SCE also expressed a willingness to discuss other potential enhancements to the Park. At the conclusion of the meeting, it was agreed that City and State Park representatives would meet as soon as possible to discuss the alternatives and potential mitigation measures.

The follow up meeting between the State Park's General Counsel and its Regional Director and the City Manager and City Attorney was transformed into a telephone conference on November 30. In preparation for the meeting, Chino Hills' staff and consultants spent significant time and resources refining alternatives for purposes of engaging in meaningful dialogue with State Parks representatives. Exhibit 2, Slides 4-9 contain all of the alternatives that were presented for discussion at this meeting. The telephone conference between State

Parks General Counsel and the City's representatives lasted for about thirty minutes. During that discussion, State Parks stated that it was not willing to set forth any proposals or details regarding what alternatives and mitigations it might find acceptable and that State Parks saw no need for further meetings with the City. In contrast, the City strongly believes that the benefits of its Revised Alternative C for both the City of Chino Hills and Chino Hills State Park are so substantial that it will receive very serious consideration by the Public Utilities Commission, and that State Parks and the City should continue communicating during the environmental review process to maximize those benefits and identify appropriate mitigation measures.

### **City's Original Alternative Proposal**

The City's original proposed alternative was designed to minimize any impact on the Park while recognizing that the most economic means of completing the TRTP transmission line was to connect it to the existing 500 kV transmission line which lay inside the Park. This would involve constructing a 500 kV transmission line parallel to an existing 220 kV transmission line in the Park for approximately 3 miles. A physical facility referred to as a "switching station" would also have to be constructed within the same transmission line corridor. Exhibit 2, Slide 4 contains a description of the overall benefits and potential impacts of this alternative. In short, this alternative removes the transmission lines from a residential neighborhood, imposes minimal impacts on the Park, and according to our preliminary analyses reduces the cost of the Project. This alternative would also eliminate about 15 miles of 500 kV transmission lines that were proposed to be built through the cities of Chino Hills, Chino and Ontario, thereby avoiding substantial additional environmental impacts for the TRTP. While it was anticipated that State Parks might have some concerns regarding the proposal, the City was optimistic that State Parks, as another governmental agency, would see the greater good in the proposal and work with the City to resolve whatever concerns State Parks might have with the Proposal.

### **Details of City's Second Alternative Proposal**

As explained above, based in large part upon an October 19, meeting with CPUC staff, the City learned of State Parks' dissatisfaction with the City's proposed alternative. In an effort to study and attempt to resolve these concerns, the City in conjunction with SCE, developed for discussion purposes several other alternative transmission line routes. These routes were identified as Routes B, C and D.

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These three alternative routes were discussed at some length at the November 15, meeting referenced above. At that meeting, State Parks representatives stated that they would not support any of the proposed alternatives but would not object to Route D being included in the routes to be studied as part of the CEQA process. Alternative Route D is the most costly to build and also the route that would result in the greatest amount of new transmission lines being built through currently protected open space (including both City designated open space and park land).

The City believes it is more productive to pursue further discussions regarding Alternative C rather than Alternative D. Consequently, the City, with SCE's assistance, revised Alternative C to address the concerns raised by State Park. This Revised Alternative C simply realigns the existing 500 kV transmission line passing through the Park in such a way as to allow it to connect to a switching substation to be located just outside the Park boundary. In addition, it would remove from the Park the entire length of the existing 220 kV transmission line west of the new switching station and place it outside the Park boundary. We expect that revised Alternative C will result in a net reduction of approximately 2 miles of transmission lines located within the park, a net reduction of 14 acres of park land encumbered by transmission lines, the removal of all of the existing transmission lines located in Water Canyon Natural Preserve, a net reduction of 4 transmission line towers located within the Park and potentially a lower profile of the transmission facilities that will improve the aesthetic impact on the Park. We also expect that this alternative will result in a meaningful cost savings with regard to the cost of construction of the Project. Finally, it avoids placing the 500 kV lines directly adjacent to Chino Hills' residents – the taxpayers and people that most frequently use and support the Park. Attached as Exhibit 2, Slide 7 is a depiction of the various lines that would be removed from or relocated as a result of this Revised Alternative C. Attached for your ease of reference is a booklet containing a larger version of the maps of all of the alternative routes. We understand that all of the alternatives discussed above and considered for this Project are subject to change and refinement as the review process proceeds.

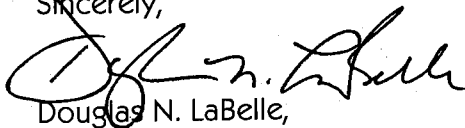
As indicated above, the City believes that the CPUC and its environmental consultant will conclude that there is significant merit in Revised Alternative C and that it will be one of the alternative routes studied during the preparation of the CEQA draft environmental impact report for this segment of the TRTP. Accordingly, if any additional mitigation measures are to be developed or adopted for the purpose of benefiting the Park or assisting State Parks in achieving its goals, the active participation of State Parks will be essential. The City stands ready to work with State Parks, the CPUC and SCE in attempting to craft an alternative route and mitigation measures that not only reduce the existing impact of electric transmission lines on the Park but also help further State Parks' efforts to protect and preserve the Chino Hills State Park. I hope that State Parks will conclude that it is in the best interests of the State Park system for it to join in that effort.

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It is noteworthy that the City of Chino Hills has over 3,000 acres of open space and that the City has been an admirable public steward with respect to the protection of the environment. In the past it has financed the "construction" of wetlands, adopted a rigorous hillside development ordinance to protect the aesthetics of the various view sheds in the City, and constructed and currently maintains a recreation trail system that provides 38 miles of trails for use by the public. If you have not visited our City before, it would be my pleasure to give you a personal tour of Chino Hills so that you have a better understanding of the City and people that are attempting to work with State Parks.

Hopefully, this communication will serve as a stepping-stone to improved communications between our respective agencies. We look forward to engaging in productive and vibrant discussions that benefit both the City and the Park.

Sincerely,



Douglas N. LaBelle,  
City Manager

DLB:EC:ssr

cc: Governor Arnold Schwarzenegger  
Susan Kennedy, Chief of Staff  
Dan Dunmoyer, Cabinet Affairs Secretary  
Ross LaJeunesse, Deputy Chief of Staff  
Senator Robert Margett  
Assemblyman Robert Huff  
Mike Chrisman, Secretary, Resources Agency  
Mayor and Council Members  
State Parks Commissioners  
Brad Torgan, AICP, State Parks General Counsel  
Gary Watts, State Parks Regional Director  
Thomas Flynn, TRTP Project Manager, CPUC  
Larry Chaset, Senior Counsel, CPUC  
Les Starck, Vice-President, SCE  
Sandi Blain, Manager, SCE  
Joe A. Gonsalves & Son, Anthony Gonsalves  
Mark Hensley, City Attorney, Chino Hills  
Michael Day, Special Counsel, Chino Hills

Attachments