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DEPARTMENT

City of
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September 22, 2015

CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Regarding: Comments on Draft EIS/EIR for SCE West of Devers Upgrade Project

To Whom It Concerns:

This letter is in regards to the Notice of Availability of a Draft EIS/EIR (referred to as "EIS/EIR" for the SCE West of Devers Upgrade Project (Project) that was received by the City of Redlands. The City would like to thank you for the opportunity to comment on the EIS/EIR. The following provides the City of Redlands' comments and concerns on the portions of the Project that are proposed within its boundaries:

I. Alternatives

The City of Redlands supports the Phased Build Alternative as the environmentally superior alternative. The City supports this alternative as it would avoid significant permanent visual impacts, as well as severe short-term construction related impacts associated with the 66 kV subtransmission line relocation.

The City of Redlands would be supportive of the Iowa Street 66 kV Undergrounding alternative if the subtransmission line were to be undergrounded from Citrus Avenue to Barton Road along Iowa Street. The City does not support the Iowa Street 66 kV Undergrounding alternative as it is currently proposed and would represent a significant aesthetic impact within a residential and office environment.

II. Project Description

Table B-8. Typo correction. Redlands is within San Bernardino County, not Riverside County.

Page B-25. 2nd Paragraph states "A majority of materials associated with the construction efforts would be delivered by truck to designated staging yards..." What other modes of delivery would occur? Please account for how all materials would be delivered to the Lugonia Avenue staging yard.

III. Agricultural Resources

Page D.2-4, Last paragraph. Correction. The City of Redlands has three agricultural zones (A-1, A-1-20, and A-2).

IV. Climate Change

No mitigation is recommended. Though the EIS/EIR states no mitigation is required, should there be measures related to construction equipment operation in order to minimize GHG emissions, such as idling time?

V. Hazards and Hazardous Materials

Mitigation measures are appropriate, however, should specific reference be made to a requirement for a SWPPP as there is in Section D.19? Will local agencies also review/approve the Soil Management Plan?

VI. Noise

D.13-7. City of Redlands Municipal Code, 2nd Paragraph. The interpretation of the Redlands Noise Ordinance is incomplete. The proper reading of the ordinance is as follows "Construction And/Or Demolition: Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of six o'clock (6:00) P.M. and seven o'clock (7:00) A.M., including Saturdays, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work by public service utilities, the city or another governmental entity. All mobile or stationary internal combustion engine powered equipment or machinery shall be equipped with exhaust and air intake silencers in proper working order, or suitable to meet the standards set forth herein."

D.13-7. Third Paragraph, last sentence. Operations at night or outside of work hours would be inconsistent with the City of Redlands' Noise Ordinance.

D. 13-7 Fourth Paragraph, first sentence. Define helicopter routes within the City of Redlands and provide the proximity of sensitive receptors. The City is concerned with the noise generated by helicopters when flying over residences and other sensitive receptors.

VII. Paleontological Resources

Mitigation measures are appropriate, however, should paleontological work undertaken on lands not overseen by BLM still be completed by qualified paleontologists with appropriate permitting from the applicable local agency?

VIII. Transportation and Traffic

Impact T-4 will require an analysis of the quantity of large construction vehicles operating on local roads in order to allow appropriate mitigation analysis and estimation. How is deterioration to be evaluated? Mitigation measures presented only discusses surface damage. Surface damage can be agreed upon but deterioration of subgrade is based upon load of vehicles, quantity of vehicles, and design of structural section. The mitigation measure should specifically state Project should "make the local agency whole" in regards to accelerated deterioration of the road as a result of project construction traffic. Wording of T-4a could cause problems because roads cannot be repaired to pre-construction condition. i.e., if a section of road requires reconstruction, it cannot be reconstructed to be a 22 year old road. Reconstruction would put an onerous burden on the project. But only repairing surface damage excuses the project from deterioration. Would a specific charge of EAL/mile be appropriate mitigation, i.e., \$0.67/EAL/mile driven on a secondary truck route?

IX. Visual Resources

Section 18.1.2.3. 2nd paragraph, 2nd sentence. "For the most part, the Proposed Project would parallel existing transmission lines..." In what instances would the Proposed Project not parallel the existing line? Where would this occur?

Section 18.3.2. Significance Criteria #1, second to last sentence. "...there are no officially designated or community recognized scenic vista view-points per se in the Proposed study area." Please explain the meaning of "per se" in this instance. Are there or are there not officially designated or community recognized scenic vista view-points in the proposed study area?

VR-8a. Would local agencies have the opportunity to review the landscape mitigation plan prior to its approval and implementation?

VR-9a. Define "excessive glare". The EIS/EIR states colors and finishes of structures are to be "consistent with local policies and ordinances". How would the applicant and/or the lead agency ensure compliance with local policies and ordinances?

X. Water Resources and Hydrology

Mitigation measures are appropriate, however, will local agencies have oversight of the SWPPP for work done within their jurisdiction? i.e., working similar to D.20 – "Plan reviews shall include CPUC, BLM, CAL FIRE, San Bernardino and Riverside Counties, and local municipal fire agencies with jurisdiction over areas where the project is located."

XI. Miscellaneous

How shall the public within the Project study area be notified? The City of Redlands recommends incorporation of a mitigation measure requiring public information and notification prior to and during construction. Additionally, CEQA/NEPA and public hearing notices concerning the Project must be sent to City residents, not only those residences within 300 feet, but to all City residents impacted by the construction and operation of the Project

Appendix 9, Page 40. Typo in the determination paragraph of 7.41b.

In conclusion, it is the City of Redlands' opinion that Draft EIS/EIR requires clarification on the above mentioned items and supports the environmentally superior Phased Build Alternative. Further, the City of Redlands is requesting receipt of any and all CEQA/NEPA and public hearing notices regarding the Project.

If you have any questions concerning the above comments, please contact me at (909) 798-7555 ext. 1797 or by email at: emilyelliott@cityofredlands.org.

Sincerely,



Emily Elliott
Associate Planner