

September 22, 2015

Billie C. Blanchard (CPUC)/Frank McMenimen (BLM) c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002

Re: West of Devers Upgrade Project – Draft EIR/EIS (SCH #2014051041)

Dear Ms. Blanchard and Mr. McMenimen:

The City of Colton is pleased to participate in the scoping process for the West of Devers Upgrade Project by providing comments on the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). As you are aware, Segment 2 of the project is located, in part, within the City of Colton. City of Colton staff has reviewed the Draft EIR/EIS in light of this, and in consideration of our previous comments on the Notice of Preparation (NOP). Our comments are as follows:

# Visual Resources (D.18)

The visual simulation depicted on Figures D.18-9A and 9B (vicinity of Canyon Vista Drive, just west of East Chase Canyon Lane) and the accompanying narrative finds that there will be "low to moderate change in visual character." The primary recommended mitigation is to "minimize visual contrast in project design." Visual impacts will likely increase with the addition of "FAA hazard marker balls." We request that the project proponent keep the City informed regarding FAA requirements regarding the marker balls as the project is designed in greater detail.

The accompanying narrative to the visual simulation (page D.18-39) also states that the taller structures will be placed lower on the slope, thereby minimizing the visual contrast. However, from the visual simulation it does not appear that the taller structures are being placed lower on the slope. Please provide more

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detailed information on the placement of towers, including the linear feet from existing pad(s) to proposed pad(s).

Although we welcome the visual simulation provided from the vicinity of Canyon Vista Drive, we request additional visual simulation of views of the towers from the following two neighborhoods (with and without the project): Mohave Drive east of Skyview Drive; vicinity of Prado Lane and East Ridge View Drive.

We are disappointed to read that the "Segment 2 Underground Alternative: East of I-215" and the "Segment 2 Underground Alternative: East of Vista Substation" were eliminated from further analysis after preliminary screening. Due to the potentially significant impacts on views from residential areas, we again request further, detailed analysis of Segment 2 underground alternatives.

#### Land Use and BLM Realty (D.11)

Chapter D.11 references the Reche Canyon Specific Plan, and the proposed project's impact on 71.3 acres. However, the accompanying exhibits do not depict the approved land uses within the Specific Plan (land uses are only identified as "Specific Plan"). We request that this chapter include an exhibit of the land uses permitted and planned by the Reche Canyon Specific Plan, including identification of any areas yet to be developed, and their proximity to the utility corridor.

# Wildland Fire (D.20)

We note that Mitigation Measure WF1a requires preparation of a Fire Management Plan which will be reviewed by State and local fire prevention authorities. We would appreciate the opportunity to review the Fire Management Plan at least 30 days prior to adoption.

### Transportation and Traffic (D.16)

Chapter D.16 references truck haul routes from the Material and Equipment Staging Area located at the northeast corner of Mt. Vernon Avenue and Canal Street in Grand Terrace:

Barton Road – between Reche Canyon Dr. & Mt. Vernon Ave.; Mt. Vernon Ave. – between I-215 & Van Buren St.; and La Cadena Dr. – between I-215 & Agua Mansa Rd. Segments of each of these proposed truck routes are located within the City of Colton. The City of Colton is in the process of adopting new citywide truck routes. Please ensure that the Colton Public Works Department receives the Construction Transportation Plan and Traffic Control Plan for review and approval at least 30 days prior to commencing construction activities.

## Recreation (D.15)

Table D.15-1 and the accompanying narrative identifies the common area of the Rancho Mediterrania Mobile Home Park as a "park." Please add clarifying language that this area is a private common area, consisting of clubhouse, pool and tot lot for the mobile home park.

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## Noise (D.13)

Due to the potential noise and safety impacts of helicopter traffic on Reche Canyon area residents, please submit a copy of the Helicopter Land Use Plan to the City of Colton for review and comment at least 30 days prior to approval by the FAA. We note that "safety precautions may require homes near helicopter activity to be temporarily vacated" (page D.13-16). We request that the Helicopter Land Use Plan identify conditions that may require vacation of homes, and advanced notification requirements.

Thank you for the opportunity to participate in the environmental review process for this project. We look forward to ongoing input and dialogue as final planning and design proceeds for the West of Devers Upgrade Project. Should you have follow-up questions or require clarification of our comments, please contact me at 909-370-5185.

Respectfully,

MARK R. TOMICH

**Development Services Director** 

C: G. Harold Duffey, City of Grand Terrace City Manager
T. Jarb Thaipejr, City of Loma Linda City Manager
Bill Smith, City Manager, City of Colton
David X. Kolk, Colton Electric Utility Director
Amer Jakher, Colton Public Works Director