

CITY OF MONTEREY PARK

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June 23, 2016

California Public Utilities Commission
Re: Mesa 500kV Substation Project
c/o Ecology and Environment, Inc.
San Francisco, CA 94111

Re: Notice of Availability Draft Environmental Impact Report (EIR) for the Mesa 500kV Substation Project Proposed by Southern California Edison

Dear California Public Utilities Commission:

Thank you for providing the City of Monterey Park ("City") the opportunity to comment on the Draft Environmental Impact Report for the Mesa 500 kV Substation. The 45-day public commenting period began on April 29, 2016 through June 13, 2016 and was extended to 60-days through June 27, 2016. The City of Monterey Park has reviewed the Draft Environmental Impact Report and requests that the CPUC consider and respond to the following comments.

ES.1.2 Proposed Project Overview

Table ES-1 Major Components of the Proposed Project.

Comment: The Mesa Substation is the first category identified in Table ES-1. Although the second bullet point identifies the demolition of the existing 21.6 acre site, none of the bullet points (Major Components) identify the grading as a major component of the project. Per the NOA, the Mesa Substation would be enlarged from 21.6 to 69 acres. To accommodate the increase in size, significant grading would be necessary to accommodate the enlarged substation. It is the City's opinion that the grading should be considered a "Major Component" of the project and evaluate as such. Accordingly, the DEIR should be revised to reflect the substantial grading activities necessary to triple the area for the substation and the measures needed to control fugitive dust.

Comment: The first bullet point in this Table ES-1 identifies the site area as 86.2 acres, but the NOA identifies the increase in site area to 69 acres. Which is correct?

ES.2 Impacts, Mitigation Measures, and Alternatives

Table ES-2 Impacts and Mitigation Measures Discussed in this EIR.

Aesthetics, Impact AE-1: MM AES-3: Landscape and Aesthetic Treatment along Potrero Grande Drive

Comment: This mitigation measure should require the use California native and/or drought tolerant landscape materials to minimize water consumption.

Comment: The City requests to be included in the review of the proposed retaining walls and block walls. The photo simulations shown in Figures 4.1-5c, d, e, f, show the proposed perimeter wall to be constructed with split-face blocks in a dark brown color with beige columns. The City concurs with the proposed material and colors and request that the block wall be finished with a decorative cap.

Comment: On page 4.1-29, Key Observation Point (KOP) 1: View East from Potrero Grande Drive at Atlas Avenue of the DEIR, it states that two landscape options will be considered. The City requests that the CPUC consider increasing the width of the planting strip in front of the block wall along Potrero Grande Drive and Greenwood Avenue to 10 feet to provide adequate space for plant growth. Additionally, the City request that a combination of trees, shrubs and groundcover be planted in the planting strip, in essence, a hybrid of Landscaping Options 1 and 2. Although SCE would prefer not to install trees in the landscape areas between the property line and the 12-foot high masonry wall because of security concerns, there are medium sized conical shaped trees that would be appropriate for reducing the mass of the perimeter wall and metal transmission towers.

Comment: There are a variety of drought tolerant plants that can effectively detour graffiti vandalism. Such plants should be incorporated into the overall design of the perimeter landscaping.

Aesthetics, Impact AE-1: MM AES-4: Graffiti Deterrence

Comment: It is the City's position that the mitigation proposed to deter graffiti vandalism is not adequate for the following reasons. The proposed project includes encircling the project site with a 12-foot high masonry wall thereby improving security to the site. For those areas of the proposed 12-foot high masonry wall that are facing Potrero Grande Drive and Greenwood Avenue, those areas should have adequate accessibility to remove graffiti. However, the City of Monterey Park questions the ability to remove graffiti along those areas of the 12-foot high masonry wall that are situated along a property line. Specifically, the areas in questions are along the south and southwest property lines abutting Caltrans right-of-way and facing the 60 Freeway. If the proposed wall in these locations is constructed abutting a property lines, SCE will not be able to remove the graffiti from the south facing portion of the wall that face the freeway because Caltrans does not permit access to their property for graffiti removal. Because the likelihood of graffiti vandalism is so great, allowing the installation of a 12-foot high masonry wall along the property line in these areas would substantially degrade the visual environment along the 60 Freeway through the City of Monterey Park. As such, the current mitigation measure to address graffiti vandalism is not acceptable.

There are two alternatives available to SCE to address this issue. The first would be to change the proposed block wall to a decorative 12-foot high non-view obscuring metal fence (non-solid surface) thereby eliminating the surface where graffiti could be placed. The second alternative would be to set the proposed 12-foot high masonry wall at least 10 feet from the south and southwest property lines with security fencing along the SCE and Caltrans property line thereby allowing the installation of a secured access road for maintenance vehicles to remove/abate graffiti vandalism.

Comment: There is a variety of drought tolerant plants that can also function as graffiti deterrents. Incorporate this type of plant material in the Graffiti Deterrence mitigation measure.

2.0 Project Description

2.3 Construction of the Proposed Project, 2.3.1 Staging Yards and Work Areas (Pages 2-48 through 2-50)

Comment: The City of Monterey Park is concerned with the proximity of Staging Yard 1 and its proximity to residential uses in the city. Specifically, due to the location Staging Yard 1 and its proximity to residential uses, a project design feature/condition should be included that does not allow for stockpiling of soil or construction debris, salvaging of debris or materials and should not allow for the storage of fuel for the construction vehicles. It is also stated that helicopters would use Staging Yard 1. Again, due to the proximity of Staging Yard 1 to residential uses, helicopters should not be used at this staging yard. Accordingly, only less intensive uses and/or activities should be allowed. Please specify the type of uses and/or activities being considered for Staging Yard 1.

2.3.2 Substation Construction, 2.3.2.1 Site Preparation

Comment: On page 2-51, line 2, it states that a permanent driveway will be constructed off of East Markland Drive for secondary and emergency access. The Monterey Park Fire Department requires that the proposed fire access roadway meet several standards, including a minimum width of 20 feet, a fire apparatus road grade not to exceed 10 percent, the roadway must be all-weather and capable of supporting loads of 75,000 pounds, the roadway must provide a clear height of 13 feet 6 inches, and dead-end roadways in excess of 150 feet must be provided with approved provisions for the turning around of a fire apparatus.

2.3.2.4 Helicopter Use

Comment: Same as comment above on helicopter use at Staging Yard 1.

4.1 Aesthetics

See the comments in the Project Overview Section above under the mitigation measures.

4.10 Noise and Vibration

4.10.3.3 Environmental Impacts, Table 4.10-15 Transformer Noise Levels at Sensitive Receptors (Page 4.10-22 and 4.10-23)

Comment: There is a much closer sensitive receptor than Holly Oak Dr. that was identified in Table 4.10-15. Specifically, there is a new housing project (Encanto Walk) to the northeast that is only 150 feet away from Staging Yard 1. This section of the DEIR should be rewritten to evaluate the potential noise impacts from Staging Yard 1 (short-term) and the transformer (long-term) to the residential neighborhood at Encanto Walk.

Comment: The DEIR indicates that there may be construction during the evening times and temporary lighting will be placed on the property. According to the Monterey Park Municipal Code (MPMC) §§ 9.53.070(5) and (6), the operation of any mechanically powered saw, sander, drill, grinder, lawn or garden tool or similar tool is allowed between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on Saturdays, Sundays and holidays. Construction or demolition work is allowed to be conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and hours of 9:00 a.m. and 6:00 p.m. on Saturdays, Sundays and holidays. Address these standards as part of the noise restriction for the project.

4.14 Traffic and Transportation

Comment: On page 4.14-1 of the DEIR, the City reaffirms its comments on requiring a Traffic Management Plan for during construction work as well as encouraging construction and project related vehicles to travel and circulate mostly during off-peak traffic rush hours.

Comment: It is stated on page 4.14-25 of the DEIR that Phase II would involve the stringing of the 220 kV transmission line across Potrero Grande Drive and SR 60 near Markland Drive. Line stringing would require the temporary closure of Potrero Grande Drive. Additionally, on page 4.14-28, Phase III would involve stringing of the 500 kV transmission lines across Greenwood Avenue. Line stringing would require temporary closure of Greenwood Avenue. The City concurs with MM TT-2 that prior to the initiation of Phases II and III that preparation and implementation of a Road and Lane Closure Plan be review and approved by the City.

Comment: The City also concurs that any road damage caused directly as a result of ground disturbing activities be repaired by South California Edison (SCE), as stated on page 4.14-36 of the DEIR.

Comment: On pages 4.14-36 of the DEIR, under Impact TT-5, the Road and Lane Closure Plan must also address the closure of roadways and lanes when the MWD water pipeline within Potrero Grande Drive is relocated. Additionally, adequate notification time must be provided to the Monterey Park Fire and Police Departments to prepare for the roadway closures.

Comment: On page 4.14-37 of the DEIR, the City requests to be included in the review of the Public Transit, Pedestrian and Bicyclist Plan that takes into account the location and during of public transit stop closures, sidewalk closures, and bike lane closures once known.

Comment: As stated on page 4.14-40 of the DEIR, the City requests adequate notification time in preparation for any anticipate Highway Closures and to be included in the review of the Highway Closure Plan.

The City of Monterey Park encourages Southern California Edison and the California Public Utilities Commission to maintain an open line of communication and include the City in the planning and review process of the supplemental plans required as mitigation measures in the DEIR. The City strongly believes that this will help to minimize impacts for the duration of the project. If you have any questions, please contact this office at (626) 307-1315.

Respectfully,



Michael Huntley
Director of Community and Economic Development
City of Monterey Park