



**Department of Public Works**  
Environmental & Construction • Flood Control  
Operations • Solid Waste Management  
Surveyor • Transportation

Gerry Newcombe  
Director

September 16, 2015

File: 10(ENV)-4.01

Billie Blanchard (CPUC Project Manager)  
California Public Utilities Commission & Bureau of Land Management  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA. 94104-3002  
[westofdevers@aspeneq.com](mailto:westofdevers@aspeneq.com)

**RE: CEQA/NEPA – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT/DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE WEST OF DEVERS UPGRADE PROJECT FOR THE CALIFORNIA PUBLIC UTILITIES COMMISSION**

Dear Mr. Blanchard:

Thank you for giving San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on August 11, 2015** and pursuant to our review, the following comments are provided:

**Environmental Management Division (Marc Rodabaugh, Stormwater Program Manager, 909-387-8112):**

1. While SCE is explicit in its intention to implement a SWPPP to address potential water quality impacts *during* construction, they neglect to address the Construction General Permit's requirements for permanent post-construction BMPs. This needs to be addressed. In addition, SCE must evaluate NPDES MS4 Phase I and II requirements for post-construction BMPs. In San Bernardino and Riverside Counties, it may be necessary to prepare Water Quality Management Plans for those portions of the project (facilities, paved areas and/or roadways) where new impervious areas are created, or existing impervious areas are replaced. SCE must consult with the appropriate municipal jurisdiction (City or County) to determine the applicability of these plans.

**Traffic Division (Eloy Ruvalcaba, PWE III, 909-387-1869):**

1. It appears by the Draft EIR that Reche Canyon Road between Prado Lane and Westwood Street, which is currently maintained by County of San Bernardino Department of Public Works, may be impacted by the overhead construction of Segment 2 of this project. For temporary road or traffic lane closure along this segment of Reche Canyon Road due to construction activities, a road permit must be obtained from County of San Bernardino Department of Public Works – Road Permit Section.

**BOARD OF SUPERVISORS**

ROBERT A. LOVINGOOD  
Vice Chairman, First District

JANICE RUTHERFORD  
Second District

JAMES RAMOS  
Chairman, Third District

CURT HAGMAN  
Fourth District

JOSIE GONZALES  
Fifth District

GREGORY C. DEVEREAUX  
Chief Executive Officer

2. Prior to the start of construction, the Traffic Control Plans for Segment 2 of this project in particular for Reche Canyon Road must be reviewed by County of San Bernardino Department of Public Works – Road Permit Section.
3. Page D.16-7, Table D.16.1.2.3, Segment 3 (San Timoteo Canyon): Palomares Road and Smiley/Lisa Marie Ln are not maintained by County of San Bernardino Department of Public Works. It appears that these roads are under the City of Redlands jurisdiction. Please verify with the City.
4. Please clarify if there is going to be any long-term road closures during construction of this project.

**Transportation Planning Division (Jinghui Bradley, PWE III, 909-387-8173):**

1. Under impact T-4 on Page D.16-19: in addition to Caltrans special permits, moving permits from affected local agencies for loads exceeding legal weight and size limits on local roads will also be required.
2. Under T-4a on Page D.16-19:
  - a. Entire road used by the construction activities, instead of just 500 feet in each direction of project access points, should be covered.
  - b. In addition to repair roads to pre-construction condition after major construction, SCE should pay affected public agency for extra maintenance costs during the construction.

If you have any questions, please contact the individuals who provided the specific comment, as listed above.

Sincerely,



**NIDHAM ARAM ALRAYES, MSCE, PE, QSD/P**  
Public Works Engineer III  
Environmental Management