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April 6, 2009

John Boccio/Justin Seastrand  
CPUC/USDA Forest Service  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301

SUBJECT: TEHACHAPI RENEWABLE TRANSMISSION PROJECT DRAFT  
ENVIRONMENTAL IMPACT REPROT (SCH #2007081156)

To Whom It May Concern:

The City of Ontario has reviewed the information contained in Draft Environmental Impact Report (DEIR) for the Tehachapi Project. Based on that review, the City offers the following comments for the DEIR:

1. *In our letter of August 2, 2008, the City requested that all new towers (500 kV and 220kV) be tubular steel poles rather than the skeletal design. Mitigation Measures V-2a states as follows:*

***“Use tubular steel poles instead of lattice steel towers in designated areas. When feasible, SCE shall use tubular steel poles, rather than lattice steel towers, in locations designated by the CPUC and the FS (for NFS lands), to reduce visual impacts as seen from sensitive receptor locations and/or to match existing and/or future wind turbine generator monopoles and/or to accomplish community desires. SCE shall submit a Structure Type and Treatment Plan to the CPUC and FS, as appropriate, 45 days after Project approval, demonstrating compliance with this measure and Mitigation Measure V-2b (Treat surfaces with appropriate colors, textures, and finishes).”***

**Comment:** The mitigation measure does not identify the specific locations for which tubular steel poles (TSP) will be used and, in fact, defers mitigation to some future date and approval process contrary to the requirements of CEQA. The mitigation measure should identify the TSP locations to allow adequate review by all parties.

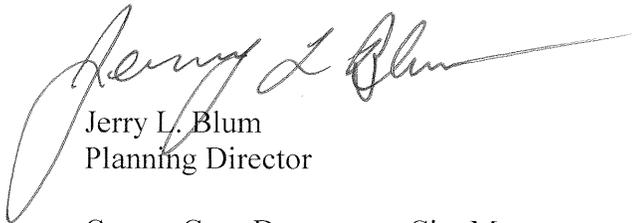
2. *In our letter of August 2, 2008, the City noted that placement of the lines in the area west of Haven Avenue, between Chino and Schaefer Avenues, requires an additional 150-foot wide easement be obtained. This location impacts existing entitled projects and proposed developments. The City requested the PUC consider a reduction in the easement width from 150 to 100 feet as part of the application.*

**Comment:** The DEIR appears internally inconsistent. Table 3.9-1 of the DEIR says that “no residential land uses would be temporarily or permanently displaced.” Figure 2.2-1v, however, indicates that a new 150-foot wide expanded right-of-way (ROW) will be required east of the existing ROW. Further, it does not appear that any analysis has been done in consideration of the request to reduce the easement width requested during the scoping period.

After consideration of the various alternatives provided in the DEIR, the City of Ontario finds that Alternative 4 is the preferred alternative. Alternative 4 would provide the necessary facilities to transmit the wind-generated electricity to the Inland Empire without any new facilities being required within the City. Alternative 4 would eliminate the need for new, taller towers impacting nearby existing and proposed residential development.

If the City can be of any assistance, please feel free to contact me at (909) 395-2199 or [jblum@ci.ontario.ca.us](mailto:jblum@ci.ontario.ca.us) or Scott Murphy, Assistant Planning Director at (909) 395-2419 or [smurphy@ci.ontario.ca.us](mailto:smurphy@ci.ontario.ca.us).

Sincerely,



Jerry L. Blum  
Planning Director

Cc: Greg Devereaux, City Manager  
Otto Kroutil, Development Director  
Scott Murphy, Assistant Planning Director