Comment Set A.9: City of Lancaster

Lancaster

VIA MAIL/FASCIMILE

October 2, 2006

John Boccio/Marian Kadota CPUC/USDA Forest Service c/o Aspen Environmental Group 30423 Canwood Street, Suite 215 Agoura Hills, CA 91301 Bishop Henry W. Hearns Mayor

Ed Sileo Vice Mayor

Jim Jeffra Council Member

Ronald D. Smith Council Member

Andrew D. Visokey Council Member

Robert S. LaSala City Manager

Re: City of Lancaster Comments on the Draft EIR/EIS for the Proposed Antelope-Pardee 500kV Transmission Project

Dear Mr. John Boccio/Ms. Marian Kadota

The City of Lancaster has reviewed the Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Antelope-Pardee 500-kV Transmission Project. For the most part, the document is well written, organized and informative. However, the City does have the following comments and suggestions.

- 1. The City of Lancaster does not have a preference between the proposed project and Alternatives 1 through 4. However, the City would prefer that Alternative 5 was not selected due the creation of an entirely new route for the transmission line through the City of Lancaster which presents the following concerns:
 - The transmission lines leading away from the Antelope Substation will head south, requiring roughly five miles of new right-of-way (approximately 180 feet wide) which will cut through the western part of the City at 96th Street West from Avenue J south.
 - Construction activities would be spread over a greater geographical area and require a longer schedule for project completion, leading to increased environmental impacts.
 - The total additional vehicle miles on paved and unpaved roads within the City of Lancaster would be greater under Alternative 5 leading to traffic impacts, increased road maintenance, and air quality impacts.

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A.9-1

• Alternative 5 is located the closest to existing residential areas, thereby increasing the potential for impacts on residents considered to be sensitive to air pollution and noise impacts.

A.9-1 cont'd

- Alternative 5 is the only alternative that would result in the potential condemnation of one or more homes.
- Alternative 5 requires more water body crossings, including Amargosa Creek, than the proposed project or the other alternatives.
- 2. The Draft EIR/EIS identifies the potential to impact alkali mariposa lilies within the City of Lancaster boundaries. As such, the report states that a preconstruction survey would be conducted and any lilies identified would be flagged for avoidance. The report also states that if avoidance if not possible, then the seeds would be collected, the lilies transplanted to another location, and their success monitored for five years. The City of Lancaster has established a program for the purchase of alkali mariposa lily mitigation land which it applies to all project sites on which lilies have been identified. As part of the program, the City requests payment of \$2,405 per acre for land on which lilies have been found. The City prefers that payment of this fee be required as mitigation in the event that alkali mariposa lilies are found within the City limits.
- 3. The Draft EIR/EIS references the City of Lancaster General Plan throughout the document. However, it is referenced as the 1994 General Plan. The current City of Lancaster General Plan was adopted in 1997. Prior to that there was a 1992 General Plan. Please update the Draft EIR/EIS to reference the correct document.
 A.9-3
- 4. The City of Lancaster requests that Southern California Edison allow easements for trails within the utility corridor right-of-way. This would allow for the creation of A.9-4 pedestrian, bicycle, and horse trails throughout the area as needed.
- 5. In Section C.14, Utilities and Service Systems, Table C.14-1 identifies the landfill utilized by the City of Lancaster as the Sunshine Canyon Landfill. This statement is incorrect. Solid waste generated in the City of Lancaster is either disposed of at the Lancaster Landfill or the Antelope Valley Public Landfill, both of which are operated by Waste Management. The discussion with respect to solid waste needs to be revised to include information regarding and impacts to the Lancaster Landfill.

If you have any questions, I can be reached at City of Lancaster, Planning Department, 44933 Fern Avenue, Lancaster, CA 93534, by telephone at (661) 723-6249 or jswain@cityoflancasterca.org.

Sincerely,

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Jocelyn Swain Assistant Planner-Environmental

Response to Comment Set A.9: City of Lancaster

- A.9-1 Thank you for submitting your comments and opinions on Alternative 5. These will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.
- A.9-2 The Draft EIR/EIS indicated that alkali mariposa lily has a moderate potential to occur in or adjacent to the short section of ROW that occurs within the City of Lancaster. However, in order to reflect the comment submitted by the city and to provide further mitigation options to the applicant, the following sentence has been added to Mitigation Measure B-7. "Populations of sensitive plants shall be flagged and mapped prior to construction. If sensitive plants are located during the focused surveys, then modification of the placement of towers, access roads, laydown areas, and other ground disturbing activities would be implemented in order to avoid the plants. If sensitive plants cannot be avoided, SCE shall be responsible for the translocation of plants and/or collection of seeds from existing populations that would be impacted and the planting/seeding of these plants in adjacent suitable portions of the ROW that would not be affected by proposed Project construction or maintenance activities. These transplanted or seeded plants will be monitored for 5 years. In the City of Lancaster, impacts to alkali mariposa lilies may be mitigated through off-site compensation. Impacts to federally or State listed plant species would not be allowed except through the context of a biological opinion."
- A.9-3 The EIR/EIS has been updated.
- A.9-4 Thank you for your input. It will be considered by the agencies' decision-makers. As the comment does not address significant environmental issues, no further response is required.
- A.9-5 The Utilities and Service Systems section has been updated accordingly.