



DOCKET	
08-AFC-9	
DATE	<u>JAN 14 2010</u>
RECD	<u>JAN 20 2010</u>

R. Rex Parris	Mayor
Ronald D. Smith	Vice Mayor
Ken Mann	Council Member
Sherry Marquez	Council Member
Ed Sileo	Council Member
Mark V. Bozigian	City Manager

January 14, 2010

Felicia Miller
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Dear Ms. Miller:

This letter is to inform you of a concern the City of Lancaster has with Palmdale's power plant proposal. As you are aware the plant is located directly south of our jurisdiction and, for the most part, closer to the population of Lancaster than Palmdale. As a result, we have a concern relative to traffic.

The City of Lancaster has reviewed the traffic impact study submitted for the Palmdale Hybrid Power Plant Project at Challenger Way (formerly 10th Street East) and Columbia Way (formerly Avenue M). It is requested that the following items of concern be further examined and addressed appropriately:

1. The City of Lancaster is completely omitted in the discussion of Local LORS. Only the City of Palmdale and the County of Los Angeles are included. The City of Lancaster has its own circulation element and general plan, engineering design guidelines and Standards, Traffic Study Guidelines, and Encroachment Permit procedures. This information can be accessed on the City's website as follows: www.cityoflanasterca.org
2. The analysis does not cover other important intersections such as:
 - a. 10th Street West & Avenue L
 - b. Business Center Parkway & Avenue L
 - c. 4th Street East and Columbia Way
3. The study incorrectly assumes that Challenger Way (10th Street East) & Avenue L is un-signalized.
4. The correct street names should be used for Columbia Way (formerly Avenue M) and Challenger Way (formerly 10th Street East).
5. Projected 2011 traffic volumes appear over-inflated, particularly along Columbia Way, owing to:
 - a. Existing 2008 count data is high compared to Lancaster data
 - b. Assumed annual growth rate of 5.6% to 2011 vs. negative growth since 2007

PROOF OF SERVICE (REVISED 10/1/09) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 1/21/10
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6. Diverting construction traffic to Avenue L puts the burden on Lancaster streets and intersections for a project that benefits Palmdale. This commute route via Avenue L, prescribed for construction workers, adds a two-mile diversion and is not likely to be followed and is difficult to enforce. Columbia Way is the most direct route to access the project and should be the focus of mitigation.
7. The study does not show any Level of Service analysis using City of Lancaster definitions of significant impact per the City's Traffic Study Guidelines.

If the above concerns are properly addressed the findings might include:

1. 2011 background traffic conditions will be better than portrayed in the study.
2. The bulk of Project trips will be on Columbia Way, not Avenue L.
3. Columbia Way can handle the added Project trips.
4. Mitigation measures would be more beneficial at:
 - a. Columbia Way and SR 14 Ramps (NB & SB Off) - signalize
 - b. Columbia Way and Sierra Highway – add a 2nd WB left lane
 - c. Challenger Way and Columbia Way – signalize

In addition, some citizens expressed concerns with regard to potential air quality impacts of the plant. The plant's proximity to a number of sensitive receptors in our community is initially a cause for concern. Although the EIR seems to address air quality mitigations, our staff is currently investigating citizen concerns in this regard. If concerns arise from this investigation, we will provide additional comment on the issue as warranted.

Thank you in advance for your attention to this matter.

Sincerely,



Jason Caudle
Deputy City Manager



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
For the *PALMDALE HYBRID*
POWER PROJECT

Docket No. 08-AFC-9

PROOF OF SERVICE

(Revised 10/01/2009)

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DECLARATION OF SERVICE

I, Hilarie Anderson, declare that on, January 21, 2009, I served and filed copies of the attached City of Lancaster Comment Letter. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[<http://www.energy.ca.gov/sitingcases/palmdale/index.html>]. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

sent electronically to all email addresses on the Proof of Service list;

by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 08-AFC-9
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

Original Signature in Dockets

Hilarie Anderson