UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 3, 2006

Marian Kadota
Angeles National Forest
USDA Forest Service

John Boccio
California Public Utilities Commission
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA. 91301

Subject: Draft Environmental Impact Statement Antelope-Pardee 500-kV Transmission Project, Los Angeles County, CA (CEQ# 20060315)

Dear Ms. Kadota and Mr. Boccio:

The U.S. Environmental Protection Agency (EPA) has reviewed the above project pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

Based upon our review, we have rated this Draft Environmental Impact Statement (DEIS) as EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating System"). We are concerned with potential impacts to air quality and noise due to the air quality non-attainment status of the region and the presence of sensitive noise receptors. We are also concerned with the identified significant and unavoidable cumulative impacts. While we commend the detailed cumulative impact analysis, the DEIS does not describe mitigation measures that project proponents, other agencies, or officials can implement to reduce identified significant cumulative impacts as advised by the Council of Environmental Quality (CEQ 40 Questions No. 19(b)). Our detailed comments are enclosed.

EPA supports selection of an alternative or combination of alternatives that avoid or minimize significant unavoidable impacts to the maximum extent feasible. The DEIS states that Alternative 2 combined with Alternative 4 would result in reduced long-term effects to noise, land use, socioeconomics, and aerial fire suppression activities; and would result in the fewest significant unavoidable impacts of the evaluated alternatives. We recommend the FEIS provide a summary of the combined environmental impacts of Alternatives 2 and 4 so that the environmental consequences of a combined Alternative are clearly understood by the decision makers and the public.

We appreciate the opportunity to review this DEIS and are available to discuss our detailed comments. Please send one copy of the Final EIS to this office at the same time it is

officially filed with our Washington, D.C. office. If you have questions, please contact Laura Fujii, the lead reviewer for this project, at (415) 972-3852 or at fujii.laura@epa.gov.

Sincerely,

/s/ Nova Blazej, Acting for

Duane James, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating System
Detailed Comments

EPA DETAILED COMMENTS, ANTELOPE-PARDEE 500KV TRANSMISSION PROJECT, LOS ANGELES COUNTY, CA, OCTOBER 3, 2006

Air Quality

Minimize construction emissions on days of high ozone and particulate matter generation. The Antelope-Pardee 500-kV Transmission Project is located in the South Coast and Antelope Valley Air Basins which are in non-attainment for ozone and particulate matter smaller than 10 microns (PM10) (pps. C.2-2, C.2-5 to C.2-8). Of significant concern are potential air quality impacts in the Santa Clarita region which is in severe federal and extreme State non-attainment for ozone. The DEIS states that daily construction emissions are expected to exceed the Air Quality Management Districts' regional planning thresholds for nitrogen oxide (NOx), which contributes to ozone formation, and PM10 (C.2-22).

Recommendation:

We recommend implementation of additional mitigation measures to minimize NOx and PM10 emissions on days of high ozone and particulate matter generation. For example, when feasible, restrict construction operations during the morning hours when NOx is more likely to contribute to ozone formation, during months which have higher ozone formation, and during high wind events. The FEIS should reference any mitigation measures which would be adopted in the ROD.

Other best practices to consider for mitigating exhaust emissions from construction equipment are listed below. The Final EIS should evaluate the feasibility of measures such as these to reduce construction emissions.

- Use particle traps and other appropriate controls to reduce emissions of diesel particulate matter (DPM) and other air pollutants. Traps control approximately 80 percent of DPM, and specialized catalytic converters (oxidation catalysts) control approximately 20 percent of DPM, 40 percent of carbon monoxide emissions, and 50 percent of hydrocarbon emissions;
- Visible emissions from all heavy duty off road diesel equipment should not exceed 20 percent opacity for more than three minutes in any hour of operation;
- Use diesel fuel with a sulfur content of 15 parts per million or less, or other suitable alternative diesel fuel, substantially reducing DPM emissions;
- Minimize construction-related trips of workers and equipment, including trucks and heavy equipment;
- Lease or buy newer, cleaner equipment (1996 or newer model);
- Employ periodic, unscheduled inspections to ensure that construction equipment is properly maintained at all times and does not unnecessarily idle, is tuned to manufacturer's specifications, and is not modified to increase horsepower except in accord with established specifications

Disclose compliance with the Federal National Ambient Air Quality Standards. The DEIS utilizes the South Coast and Antelope Valley Air Quality Management Districts' regional emission thresholds to determine the level of significant impacts (C.2-17). Although it is also likely that federal standards for ozone, NOx, and PM10 are exceeded, it is difficult to determine whether this is actually the case.

> **Recommendation:**
> The FEIS should disclose compliance of the proposed Project and alternatives with the federal National Ambient Air Quality Standards (NAAQS). Air quality modeling may be required to determine compliance or non-compliance with the federal NAAQS.

Noise

Explore and describe additional mitigation measures to reduce or screen mobile equipment noise. Mobile construction equipment activities would violate the Los Angeles County noise standards even with proposed mitigation measures (pps. C.10-15 to C.10-17).

> **Recommendation:**
> We recommend the project proponents and lead federal and State agencies explore additional mitigation measures to reduce or screen mobile equipment noise. If these measures are technologically and economically feasible, the FEIS should describe and consider implementation of the measures.

Consider transmission line routes that avoid adverse noise impacts at the Veluzat Motion Picture Ranch. The proposed Project and Alternatives 1 to 3 would result in significant and unavoidable noise impacts at the Veluzat Motion Picture Ranch. For instance, the DEIS states that these alternatives would violate Los Angeles County Standards for corona noise impacts (p. C.10-17), permanently increase ambient noise levels, and result in a high level of temporary noise at Veluzat Motion Picture Ranch (p. C.10-18). These noise impacts would also result in a significant reduction in revenues for the Veluzat Motion Picture Ranch (pps. C.12-7, C.12-20).

> **Recommendation:**
> Given the significant and unavoidable noise impacts to the Veluzat Motion Picture Ranch, and the related reduction in their revenues, we recommend consideration of other route alignments such as Alternative 4 which would avoid this sensitive noise receptor.

Cumulative Impacts

Describe and evaluate mitigation measures for identified significant cumulative impacts. Many of the potential cumulative impacts for hydrology, water quality and supply, noise, biological resources, visual resources, and solid waste would be significant and unavoidable due to the level of past, present, and reasonably foreseeable construction and development projects in the project area. While we commend the detailed cumulative impact analysis, the DEIS does not describe or evaluate mitigation measures to avoid or minimize the identified significant cumulative impacts.

Recommendation:
The FEIS should describe and evaluate feasible mitigation measures to avoid and minimize the identified adverse cumulative impacts. Although these mitigation measures may be outside the jurisdiction of the lead agencies or project proponents, describing them in the FEIS would serve to alert other agencies or officials who can implement these extra measures (CEQ 40 Questions No. 19(b)). Potential mitigation measures to evaluate include phasing project construction schedules, establishing a Multi-Species Habitat Conservation Plan for the region, and promoting smart growth development practices to avoid and minimize impacts of growth that may be induced by this project.