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February 3, 2011

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 08-AFC-9

1516 Ninth Street

Sacramento, CA 95814-5512

via mail and email to [docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

re: Comments, Final Staff Assessment for Proposed Palmdale Hybrid Power Project (08-AFC-9)

Honorable Members of the Siting Committee:

Thank you for this opportunity to comment upon the Final Staff Assessment for the Proposed Palmdale Hybrid Power Plant. Antelope Valley Conservancy (AVC) is a public benefit corporation that preserves functioning habitat and watershed resources in the Palmdale region. AVC is the only area entity that is Authorized by the Department of Fish and Game to Hold Mitigation Lands.

AVC has two concerns regarding the air quality management proposed mitigation of road paving.

1. AVC requests that Barrel Springs Road/Old Harold Road be removed from the proposed paving locations. This is a private dirt road in an historic wetland, documented in the National Wetlands Inventory. Recent grading of the road is the subject of a Department of Fish and Game streambed violation. AVC has standing in this matter due to its obtaining federal and state grant funding to work with the city of Palmdale and the landowner, Palmdale Water District, to steward these historic wetlands, and increased traffic impacts from a paved road would be detrimental to wildlife and wetlands function. Moreover, City of Palmdale has documented that it is a private road, with no public right of way, and informed us that the city's intent is to locate the Barrel Springs alignment north of Una Lake, not in the location cited in the Final Staff Assessment.
2. The road paving also raises AVC's concern that the California Energy Commission, in its role as lead agency, incorporates an environmentally impactful off-site project (i.e., road paving) in an unrelated project approval process. Road paving has impacts including but not limited to construction-related and long-term increased CO2 emissions, impacts to land from piling of materials and worker parking, as noted in the Staff Assessment. Such projects need to go through local government processes with public notice and stakeholder access to information and review.

We ask you to remove the Barrel Springs Road option, and eliminate the use of off-site paving as an air quality mitigation measure.

Respectfully Submitted,  
ANTELOPE VALLEY CONSERVANCY

by Wendy Reed, MPA, President

cc: Proof of Service List 1/14/2011