Comment Set E.16: Applicant – Traffic and Transportation

ANTELOPE-PARDEE 500kV TRANSMISSION PROJECT
SCE COMMENTS & SUGGESTED REVISIONS ON DEIR/DEIS
C.13 TRAFFIC AND TRANSPORTATION

October 2006

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
1	C.13.5 Impact Analysis: Proposed Project/Action	C.13-9	Paragraph 1, Line 4	The language stating that "Approximately 40 separate construction crews, each comprised between 2 to 10 workers, would work on the various aspect of the proposed Project" could be inferred to mean that all 40 crews are working at the same time.	Revise language to state: "Approximately 40 separate construction crews, each comprised on between 2 to 10 workers, would work on the various aspect of the proposed Project at different times."	E.16-1
2	C.13.5 Impact Analysis: Proposed Project/Action Impact T-1: Closure of roads to through traffic or reduction of travel lanes would result in substantial congestion.	C.13-10	Paragraph 2, Last line	No evidence is provided for the conclusion that "Temporary road closures could substantially disrupt traffic flow and substantially increase traffic congestion, resulting in significant impacts." In general, this section does not provide sufficient baseline/LOS data to support the impact analyses.	Provide analysis to support the need for Mitigation Measure T-1a. If this analysis cannot be provided this Mitigation Measure should be deleted.	E.16-2
3	C.13.5 Impact Analysis: Proposed Project/Action Mitigation Measure for Impact T-1a: Prepare Traffic Control Plans	C.13-11	Paragraph 1, Line 2	The measures required under T-1a are unreasonable and excessive, especially the requirement to provide the appropriate responsible agencies the TCPs for review. SCE will comply with all local requirements pertaining to notifications of road closures and will follow all measures per the Work Area Traffic Control Handbook.	Provide analysis to support this Mitigation Measure, or delete it.	E.16-3

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4	C.13.5 Impact Analysis: Proposed Project/Action Mitigation Measure for Impact T-1b: Restrict Lane Closures	C.13-11	Paragraph 1, Line 2 Line 4	The mitigation measure requires that all necessary lane closures or obstructions on major roadways associated with overhead construction activities to off-peak hours only. This section does not define 'major' roadway. SCE will comply with all conditions imposed by local agencies in the encroachment permits for road/lane closures. SCE will attempt to schedule road/lane closures outside of peak travel times to the extent feasible. SCE will alternately use guard posts with netting across roads where traffic congestion has the potential to occur.	Provide clarification on 'major' roadways.	E.16-4
5	C.13.5 Impact Analysis: Proposed Project/Action Impact T-2: Construction traffic would result in congestion on area roadways.	C.13-11	Paragraph 3, Line 3	This section states that "Although traffic volumes on study area roadways are generally low to moderate, it is possible that Project-related construction traffic could contribute to congestion at heavily traveled and/or narrow roadway segments." There is no analysis provided to support this statement.	Provide analysis to support the need for Mitigation Measure T-2, or delete this Mitigation Measure.	E.16-5
6	C.13.5 Impact Analysis: Proposed Project/Action Impact T-2: Construction traffic would result in congestion on area roadways	C.13-12	Paragraph 1, Line 4	If this Mitigation Measure is retained (see previous comment), it is not feasible for SCE to require bidders to submit a construction transportation plan describing how workers would travel to the job site. There is not a single 'job site'. Workers will be traveling to multiple work locations from multiple staging locations.	Delete entire Mitigation Measure T-2, or if retained, revise to exclude the last sentence.	E.16-6

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7	C.13.5 Impact Analysis: Proposed Project/Action Impact T-4: Construction activities could temporarily disrupt transit and school bus routes.	C.13-12	Paragraph 1, Line 2	This section states that overhead stringing that requires short-term road closures would disrupt up to three Santa Clarita Transit bus routes and a number of local school bus routes. It goes on to state that potential impacts would include scheduling days and temporary bus reroutes. There is no analysis provided to support this conclusion. Typically when road/lane closures are required for conductor stringing, a controlled continuous traffic break is implemented. This would generally lead to road/lane closures of approximately 10 to 15 minutes maximum. SCE would also typically conduct stringing operations during the day outside of peak-use times, and would use guard poles.	Delete Mitigation Measure T-4.	E.16-7
8	C.13.5 Impact Analysis: Proposed Project/Action Impact T-6: Coordinate with Caltrans and the City of Santa Clarita to Avoid Conflicts with the Santa Clarita Cross-Valley Connector	C.13-13	Paragraph 1	SCE has been working with Caltrans and the City of Santa Clarita on the Santa Clarita Cross-Valley Connector Project. SCE has already relocated transmission structures as part of this Cross-Valley Connector Project and will continue to coordinate with Caltrans and the City of Santa Clarita.		E.16-8

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9	C.13-6.2 Alternative 1 Impacts and Mitigation Measures Closure of Roads to Through Traffic or Reduction of Travel Lanes	C.13-15	Paragraph 1, Last Sentence	This section discusses the potential impacts to traffic during construction of the underground transmission line and that all impact can be mitigated to a less than significant level with the implementation of a Traffic Control Plan. SCE disagrees with this conclusion, especially for construction within Copper Hill Road, which is a heavily traveled roadway.	Provide analysis to show that implementation of a Traffic Control Plan will reduce traffic impacts on Copper Hill Road to a less than significant level.	E.16-9
10	C.13-6.2 Alternative 1 Impacts and Mitigation Measures Conflict with Planned Transportation Projects	C.13-17	Paragraph 1, Last Sentence	This section states that "there is a potential that this alternative could result in the same conflict with the Santa Clarita Cross-Valley Connector project as the proposed project." SCE disagrees with this statement, because the proposed project would string over Copper Hill Road, whereas Alternative 1 places the line underground within Copper Hill Road. This would lead to a greater conflict with the Santa Clarita Cross-Valley Connector project than the proposed project. In addition, the DEIR/DEIS states on page C13-31 that arterial roadways such as Copper Hill Drive have experienced a rise in traffic congestion as a result of past and present residential development. Constructing the transmission line underground within this roadway would lead to additional traffic congestion.	Reword language to indicate that Alternative 1 could result in a greater conflict with Santa Clarita Cross-Valley Connector project than the proposed project.	E.16-10

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11	C.13-7.2 Impacts and Mitigation Measures Alternative 2: Closure of Roads to Through Traffic or Reduction of Travel Lanes	C.13-8	Paragraph 1, Line 6	This section states that the temporary closure of Spunky Canyon Road and Bouquet Canyon Road during transmission line stringing activities "could" result in "slightly increased" duration and magnitude of T-1 as compared to the proposed project. SCE disagrees with the wording of this sentence since the proposed Project does not cross either of these 2 roadways at all.	Reword to state that the line stringing "would" result in increased duration and magnitude of possible road/lane closures as compared to the proposed Project.	E.16-11
12	C.13.10.2 Impacts and Mitigation Measures Alternative 5: Disruption of Bus Transit Service	C.13-28	Paragraph 1, Line 1	This section states that the reroute portion of Alternative 5 would have no effect on transit service. This reroute would cross Sierra Highway and therefore would require stringing over the road. SCE disagrees however with the conclusion reached for the proposed Project that string operations across roads would disrupt transit service (see Comment 7).	Revise language state that the reroute portion of Alternative 5 would require stringing across Sierra Highway. Impacts resulting from this activity would be less than significant.	E.16-12

Response to Comment Set E.16: Applicant – Traffic and Transportation

E.16-1 Draft EIR/EIS Section C.13.5 states: "It is estimated that between 50 and 120 workers would commute to various locations along the proposed route ROW each workday." This specifies the total number of construction staff per day.

E.16-2 Exact construction vehicle travel routes would be required for the entire ROW to determine LOS impacts at specific intersections and roadway segments impacted. Because this information is unavailable at this time, Mitigation Measure T-1a is required to determine these routes and ensure LOS impacts would not occur.

E.16-3 Refer to the response to Comment E.16-2, above.

E.16-4 Draft EIR/EIS Mitigation Measure T-1b has modified to the following:

"…on major roadway, as designated by applicable County or City General Plans, associated with overhead construction activities to off-peak periods only."

E.16-5 Exact construction worker vehicle travel routes and trip generation calculations would be required for the entire ROW to determine LOS impacts at specific intersections and roadway segments impacted. Because this information is unavailable at this time, Mitigation Measure T-2 is required to further determine routes and trip data and ensure LOS impacts would not occur.

E.16-6 Draft EIR/EIS Mitigation Measure T-2 has modified to the following:

"…To reduce the number of Project-related vehicles traveling on roads within the Project area, site construction workers shall be staged off site at marshalling yards or near paved intersections and workers will be shuttled to construction sites in groups in crew vehicles. ~~As part of the construction contract, SCE shall require bidders to submit a construction transportation plan describing how workers would travel to the job site.~~"

E.16-7 Refer to Draft EIR/EIS Table C.13-4 for information on Santa Clarita Transit bus routes and Saugus Union School District bus routes. The information provided in your comment can be provided to these agencies during coordination efforts per implementation of Mitigation Measure T-4 to avoid conflicts should construction require disruptions to bus service.

E.16-8 Comment noted.

E.16-9 Draft EIR/EIS Mitigation Measure T-1a outlines the requirements of the Traffic Control Plan that would mitigate these potential impacts to a less than significant level.

E.16-10 Refer to the response to Comment E.16-9, above.

E.16-11 Draft EIR/EIS Section C.13.7.2 has modified to the following:

"The proximity of these two crossings ~~could~~ would result in slightly increased duration and magnitude of Impact T-1 compared to the proposed Project."

E.16-12 Draft EIR/EIS Section C.13.10.2 has modified to the following:

"The reroute portion of Alternative 5 would travel across the Sierra highway, and would travel the same route ~~have no affect on transit service. However, Alternative 5 is the same~~ as the proposed Project in the Santa Clarita area."