LETTER J: CITY OF PALMDALE

Response J-1: Your comments will be considered in the decision-making processes prior to final decisions on the Proposed Action by the BLM, USFS, and LADWP.
LETTER K: COUNTY OF KERN ROADS DEPARTMENT

Response K-1: Table D-14 of Appendix D of the Final EIS/EIR has been revised to show the correct level of service standards per Kern County’s General Plan Circulation Element.

Response K-2: A Traffic Control Plan is identified as a General Practice (GP-2) in Chapter 2, Table 2-8, page 2-87 of the Final EIS/EIR that would be implemented after consultation with transportation agencies, including Kern County. This plan would be coordinated with Kern County, other jurisdictions, and local communities to address Project construction timing with other neighboring projects.

Response K-3: If one of the action alternatives is selected, a Traffic Control Plan, identified as a General Practice GP-2, (refer to Table 2-8 in Chapter 2 of the Final EIS/EIR) would be prepared and submitted to all agencies with jurisdiction over public roads directly affected by construction activities.

Response K-4: The repair of roads damaged by Project-related activities is identified as General Practice GP-32 (refer to Table 2-8 in Chapter 2 of the Final EIS/EIR). Because this General Practice would be implemented if one of the action alternatives is selected in the decision process, no specific agreement with Kern County is necessary.

Response K-5: Table D-14 in Appendix D of the Final EIS/EIR has been revised to include county ROW as requiring an encroachment permit.
Response K-6: Table D-14 in Appendix D of the Final EIS/EIR has been revised to show that permits for overweight/oversized loads must be obtained from the Permits Engineer.
LETTER L: COUNTY OF LOS ANGELES FIRE DEPARTMENT

Response L-1: As stated in Section 1.4 in Chapter 1 of the Final EIS/EIR, BRRTP would conform to all relevant federal, State, and local statutes, regulations and plans. Code and ordinance requirements must be met during construction if one of the action alternatives is selected in the decision process.

Response L-2: Refer to Response L-1. All fire code and ordinance requirements must be met during construction if one of the action alternatives is selected in the decision process.

Response L-3: Refer to Response L-1. Regulation #27 would be met during construction if one of the action alternatives is selected in the decision process.
**Response L-4:** The building proposed at the Haskell Canyon Switching Station is planned to be unmanned. If there are any offices involved in the Project, or the building will house human occupants, then a building permit will be acquired for safety reasons. Application of a building permit will automatically trigger fire department review. No expansion of the Castaic Power Plant is proposed as part of BRRTP.

**Response L-5:** Refer to Response L-1. Additionally, Mitigation Measure BIO-13 (refer to Table 4.3.1-1 in Chapter 4 of the Final EIS/EIR) requires the protection of sensitive plant species and their habitat, including oak trees. Your comments will be considered in the decision-making processes prior to final decisions on the Proposed Action by the BLM, USFS, and LADWP.
LETTER M: COUNTY OF LA PARKS AND RECREATION

Response M-1: Your comments will be considered in the decision-making processes prior to final decisions on the Proposed Action by the BLM, USFS, and LADWP. As discussed in Chapter 4, Section 4.2.5, Recreation, pages 4-143 and 4-144 of the Draft EIS/EIR, access disruptions could occur during construction activities within the Castaic Lake State Recreation Area (CLSA). Mitigation measures R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas) and R-1b (Identify and provide noticing of alternative recreation areas) would be implemented to minimize impacts to the CLSA. Coordination between LADWP and the County of Los Angeles Department of Parks and Recreation will occur as early as possible.

Response M-2: Your comments will be considered in the decision-making processes prior to final decisions on the Proposed Action by the BLM, USFS, and LADWP. In the event a temporary staging area is required outside the existing LADWP ROW within the Castaic Lake State Recreation Area, a Right of Entry Permit would be obtained by the State with the consent of the County of Los Angeles Department of Parks and Recreation.
Mr. Holloway
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October 25, 2011

before the State can issue the Permit. For coordination please contact Mr. James Barber at 213.351.5117 or jbarber@parks.lacounty.gov.

Thank you for including this Department in the review of this notice. If we may be of further assistance, please contact me at (213) 351-5129 or jchien@parks.lacounty.gov.

Sincerely,

Jui Ing Chien
Park Planner

Attachment: 1. Proposed County Trails Map (Shapefile, sent by email)

JC:ts/Response to Barren Ridge Transmission Project NOA
C: Parks and Recreation (N.E. Garcia, L. Hensley, J. Barber, J. Bok, L. Bennett)
LETTER N: COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING

Response N-1: The potential ROW impacts of the proposed Project are discussed and described throughout the Draft EIS/EIR. While the specific width of existing ROW was not provided within the narrative of the Draft EIS/EIR, this information has been added to the Final EIS/EIR as Table ROW-1 on page 2-97 in Chapter 2 of the Final EIS/EIR. For all action Alternatives, the new 230 kV double-circuit transmission line would require a new 200-foot-wide ROW, except in areas where the proposed line would be installed on existing four-circuit towers within existing ROW or in areas where the Three-Circuit Mitigation would be applied. The Three-Circuit Mitigation would involve placing the new line and the existing AC line on new three-circuit towers, within an existing ROW or within a new 125-foot ROW. The width of new ROW required for the new double-circuit transmission line is described in the Final EIS/EIR in Chapter 2 on page 2-57 through 2-59. The Three-Circuit Mitigation is described in Section 2.4.3 of the Final EIS/EIR, and the specific locations for the three-circuit towers, within existing and new ROW, are indicated on Figure 2-17 on page 2-80 of the Final EIS/EIR. The proposed reconductoring and the addition of the new 230 kV circuit on existing towers would occur within existing ROW as indicated on pages 2-53 and 2-57 of the Final EIS/EIR, respectively.

An estimate of the total number or percent of existing towers that would need to be replaced within existing ROW was not provided in the Draft EIS/EIR because that number is not known at this time. The reconductoring of the existing 230 kV transmission line would require some structures to be replaced because they may not be structurally adequate to accommodate the new, heavier conductor. While LADWP would not know the exact number of...
The EIS/EIR states that a sensitive receptor that will be impacted by construction noise will be the Antelope Valley Poppy Reserve. Every effort should be made to avoid construction activities within the vicinity of the Poppy Reserve during the peak period for springtime viewing. A mitigation measure to that effect should be included.

On Page 4-8 of Chapter 4, second paragraph, the document includes the following statement: "Projects crossing State and private lands would be subject to applicable State and local environmental regulations, as well as any stipulations required by the applicable State and/or local authorizing agency." Although the provisions of the California Environmental Quality Act do apply to the project, local jurisdictions (cities and counties) have no zoning authority to regulate public utilities. Please be advised that we have conferred with County Counsel’s office regarding the status of those portions of the Department of Water and Power project which are located within the unincorporated portions of Los Angeles County. County Counsel has confirmed that the project is not subject to the provisions and requirements of the Los Angeles County Zoning Ordinance. Therefore, the Department of Water and Power is not required to file for approval of a Conditional Use Permit or any other zoning permit issued by the County Los Angeles.

The discussion relating to potential project impacts to Off Highway Vehicle (OHV) facilities/resources is also vague. There are no discussions regarding specific roads which might be affected. No illustrative maps are provided. It is noted that the EIS/EIR contains the following statement: "Identification of specific roads and necessary improvements required for Project construction would be determined in LADWP’s Project Road Plan, which would be included as part of final engineering." Providing such information following the conclusion of the environmental review process is not helpful to OHV enthusiasts who would wish to provide commentary during the EIS/EIR review period.

The document describes the proposed development and use of helicopter staging areas. Helicopters are proposed to make a considerable contribution to the construction effort and to be utilized on an ongoing basis for maintenance operations. The Department of Regional Planning recommends that some of the staging areas be maintained as permanent heliports following project completion which could be utilized during brush fire and search and rescue operations by the Los Angeles County Fire and Sheriff’s Departments, as well as the United States Forest Service.

The document notes that watering trucks will be stationed at construction sites for the purpose of dust control and it indicates that nearby brush may also be watered as a fire prevention measure. We would urge that the Mitigation Measure be amended to require that sufficient water for fire-fighting purposes remain in at least one of the tanker trucks at all times in the vicinity of active construction activities. This would significantly reduce the potential for fire ignition getting out of control while an empty tanker truck attempts to refuel.

Response N-2: As stated on page 4-10 of the Final EIS/EIR (Air Quality, Section 4.2.1), mitigation measure AIR-2a requires the construction contractor to develop a Fugitive Dust Emission Control Plan. Mitigation measure AIR-2a includes measures such as using non-toxic soil binders, watering, and revegetation of inactive areas to the extent practicable to reduce fugitive dust generation, which will reduce dust generated during inactive periods. If dust is noted during inactive periods, LADWP will consider the implementation of additional measures.

Response N-3: LADWP would, through coordination with California State Parks, avoid construction during the most significant peak spring viewing of the Antelope Valley Poppy Reserve area if Alternative 2, 2a, or 3 is selected in the decision process, to the greatest extent feasible. Mitigation measures R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas) would be implemented to minimize impacts to the Antelope Valley Poppy Reserve (refer to Table 4.2.5-1 in Chapter 4 of the Final EIS/EIR). Additional mitigation is not necessary.

Response N-4: Off Highway Vehicle (OHV) facilities/resources potentially affected by the Proposed Action and Alternatives are identified in Chapter 4, Section 4.2.5, Recreation, Table 4.2.5-3, Table 4.2.5-4, Table 4.2.5-5, and Table 4.2.5-6 of the Final EIS/EIR. These trails (identified by agency only) are also identified on the Parks, Recreation, and Preservation Map (February 15, 2011) located in the Maps Volume, Volume V, of the Final EIS/EIR.
Response N-5: Many of the staging areas would be on private land, and as such would not be able to serve as a heliport for firefighting without permission for such use by the landowner. However, any National Forest System lands used for staging may be considered for a more permanent use in firefighting as you have requested.

Response N-6: Mitigation measure F-2a requires the development of a Construction and Maintenance Fire Control Plan, which would include the requirements of the ANF Fire Management Plan and Title 14 of the California Code of Regulations, Article 8, #918 “Fire Protection.” Based on these requirements, the plan would include procedures for reporting fires, minimum fire suppression equipment requirements, communication, construction restrictions based on fire conditions, fire patrols, and fire suppression water supplies. These guidelines are adequate to ensure that water would be available for fire suppression if necessary, and no further mitigation is required.

Response N-7: Per the requirements of mitigation measure F-2b, during Red Flag Warning events, as issued daily by the National Weather Service in Federal Responsibility Areas (FRAs) and Local Responsibility Areas (LRAs), all non-emergency construction and maintenance activities would cease in affected areas. This mitigation measure has been revised to include the Red Flag Warnings issued by the Los Angeles County Fire Department. Refer to page 4-280 of the Final EIS/EIR.

Response N-8: LADWP would not construct above-ground fuel storage tanks on the site of the proposed Haskell Canyon Switching Station, nor was this included in the description of the proposed Project. Fuels may be contained in storage drums or above-ground storage tanks during the construction period, as
described on page 4-211 of the Draft EIS/EIR, although mobile fueling units are more commonly used. Implementation of GP-19 would ensure that storage and use of fuels and oils would occur only at approved staging and construction yards.

Response N-9: LADWP will evaluate the need for security cameras during the design stage based on security requirements for new stations.

Response N-10: Two significance criteria relating directly to 100-year floodplains were utilized in analysis of water resources in the Draft EIS/EIR: placing within a 100-year flood hazard area structures that would impede or redirect flood flows, and placing housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map (see page 4-560 of the Final EIS/EIR).

The floodplain risks posed to and by the Haskell Canyon Switching Station and transmission structures are addressed on page 4-532 of the Draft EIS/EIR under the significance criterion regarding placing, within a 100-year flood hazard area, structures that would impede or redirect flood flows. The Haskell Canyon Switching Station is not located within a 100-year floodplain, as delineated by the Federal Emergency Management Agency (FEMA) (see page 75 of the Water Resources Technical Report, located in Volume IV of the Final EIS/EIR). The nearest 100-year floodplain is that associated with Haskell Canyon, and is located approximately 0.5 mile downstream from the site of the proposed switching station. Furthermore, the switching station would be located on high ground above the intermittent stream to which it would be adjacent, and would not be affected by flood flows associated with the stream.
Portions of the proposed new 230 kV transmission line and reconductoring would be located within 100-year floodplains, specifically within the Antelope Valley, in which a large 100-year floodplain has been delineated by FEMA (see page 24 of the Water Resources Technical Report located in Volume IV of the Final EIS/EIR). Because the location of transmission structures is quite flexible, sensitive features, including smaller floodplains, would typically be spanned (i.e., avoided). In the case that transmission structures would be located within a 100-year floodplain, mitigation measures HYD-5 and HYD-6, presented in Table 4.3.3-1 in the Final EIS/EIR, provide mitigation to prevent impedance or redirect flood flows and to minimize the capture of flood debris to prevent flow obstruction and scouring. The Draft and Final EIS/EIR find that with the implementation of mitigation measures HYD-5 and HYD-6, potential impacts resulting from placing structures within the 100-year floodplain and impeding or redirecting flood flows would be reduced to less than significant.
LETTER O: DESERT AND MOUNTAIN CONSERVATION AUTHORITY

Response O-1: Your comments will be considered in the decision-making processes prior to final decisions on the Proposed Action by the BLM, USFS, and LADWP.

Response O-2: If one of the action alternatives is selected, a Habitat Restoration and Revegetation Plan for the Project would be prepared in accordance with mitigation measure BIO-1. For National Forest System lands and public lands managed by the BLM, the agencies would implement a Habitat Restoration and Revegetation Plan for the Project, which would include plans for restoring, enhancing, and/or re-vegetating. LADWP would prepare and implement a similar Habitat Restoration and Revegetation Plan for non-federal lands. Both plans would include creation or restoration of habitat, remediation activities, and a maintenance plan. Mitigation banking would be considered, as appropriate. This restoration effort will ensure habitat quality not only for the immediate Project area, but will support the habitat quality within a broad region.

Response O-3: Your suggested mitigation has been considered; however, we believe the mitigation measures in the Final EIS/EIR are adequate as proposed and satisfy the requirements of mitigation under CEQA and NEPA for addressing the impacts of the Project on biological resources (see Sections 4.3.1 and 5.3.2 of the Final EIS/EIR). Mitigation Measure BIO-1, Provide restoration/compensation for impacted sensitive vegetation communities, provides for funding for federal agencies to do off-site mitigations or acquire lands (refer to Table 4.3.1-1 in Chapter 4 of the Final EIS/EIR). Additionally, the federal agencies are committed to
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third party mitigation program to counter both the direct, indirect and cumulative impacts
of the proposed project and its alternatives.

This suggested mitigation should be in addition to the Draft EIR/EIS mitigation required for
habitat degradation along 3.7 miles of BLM land and by the Pacific Coast Trail which will
require an Angeles National Forest LMP Amendment.

Please direct any correspondence and questions to Paul Edelman, Chief of Natural
Resources and Planning, at the above address and by phone at 310-589-3200 ext. 128.

Sincerely,

Jim Dodson
Chair

working with local conservancies to prioritize opportunities to such
off-site mitigation or land acquisition.