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BARREN RIDGE RENEWABLE TRANSMISSION PROJECT

Scoping Report *SCH # 2008041038*

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113807

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1 Introduction

The City of Los Angeles Department of Water and Power (LADWP) is proposing the Barren Ridge Renewable Transmission Project to access clean, renewable resources in the Tehachapi Mountain and Mojave Desert areas, and improve reliability and upgrade transmission capacity. Work consists of: (1) construction of a 230 kilovolt (kV) transmission line from the existing Barren Ridge Switching Station to Haskell Canyon on double circuit structures; (2) addition of a 230 kV circuit on existing double circuit structures from Haskell Canyon to the Castaic Power Plant; (3) upgrade of the existing Owen Gorge-Rinaldi (OG-RIN) 230 kV Transmission Line with larger capacity conductors between the Barren Ridge Switching Station and Rinaldi Substation; and (4) construction of a new electrical switching station within Haskell Canyon near the southern boundary of the Angeles National Forest.

Based on the nature and scope of the proposed project, it has been determined that the proposed project is a major federal and state action that may have a significant adverse impact to the environment from construction, operation and maintenance of the project. Both the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) are concerned with identifying, analyzing, and disclosing the potential environmental effects of a proposed project prior to its implementation. The Forest Service, Bureau of Land Management (BLM), and LADWP will prepare a joint Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Barren Ridge Renewable Transmission Project. The Forest Service and BLM will serve as the NEPA co-lead agencies in preparation of the EIS. LADWP is the lead agency for compliance with CEQA and preparation of the EIR.

2 Project Scoping

Scoping is an early and open process for determining the scope of issues to be addressed, and identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIS/EIR. Forest Service, BLM and LADWP conducted a 31-day public scoping period to allow the regulatory agencies and the public an opportunity to comment. The 31-day public scoping period began April 7, 2008 when a Notice of Preparation (NOP) was issued pursuant to Title 14 of the California Code of Regulations §15082. (See Appendix A-2) and the Notice of Intent was published in the *Federal Register*.

This Scoping Report summarizes the public scoping effort conducted for the Barren Ridge Renewable Transmission Project (BR RTP) EIS/EIR as well as documents issues and concerns expressed during the public scoping period.

2.1 Notice of Intent

To comply with NEPA 40 C.F.R. 1508.22, the Forest Service and Bureau of Land Management published in the *Federal Register* a Notice of Intent (NOI) to prepare a joint EIS/EIR for the Barren Ridge Renewable Transmission Project on April 7, 2008, Volume 73, Number 67 (See Appendix A-1). The *Federal Register* is the official daily publication for rules, proposed rules, and notices of Federal agencies and organizations.

The NOI initiated the public scoping period for the EIS/EIR and requested all comments be received by May 7, 2008. It described the proposed project and alternatives, the agencies' scoping and environmental review process, and contact information. It served as an invitation for other federal agencies to provide comments on the scope and content of the EIS/EIR. (See Appendix A-1)

2.2 Notice of Preparation

The NOP is similar to the NOI and initiated the public scoping period and summarized the proposed project, location, the significant effects on the environment, and time, date and place of public scoping meetings.

The NOP was filed with the California State Clearinghouse on April 7, 2008 (SCH # 2008041038) and the review period ended on May 7, 2008.

The Forest Service, BLM and LADWP distributed approximately 500 NOPs to federal, state, regional, and local agencies, elected officials, organizations and Native American groups. The mailing list included the following approximate distribution:

- 383 Agencies (65 city, 105 county, 106 state, 107 Federal)
- 12 Native American Tribes
- 99 elected officials
- 4 organizations

2.3 Newsletters

In addition to the distribution of the NOP and publication of the NOI, approximately 7,200 newsletters were sent to agency representatives, elected officials, Native American Tribes, interested parties and organizations, and property owners within 500 feet of both sides of the proposed project and preliminary alternatives in Los Angeles and Kern Counties. The newsletters contained the project description, purpose and need for the project, map, described the environmental review process, announced public scoping meetings, and contained contact information and Spanish translation of the information. (See Appendix A-3)

2.4 Scoping Meetings

Forest Service, BLM and LADWP conducted seven public scoping meetings from April 22 to May 1, 2008 within the project area as listed below in Table 1. The scoping meetings provided an opportunity to share information regarding the proposed project and the decision-making processes, and listen to public and agency views on the range of issues and alternatives to be considered during the preparation of the Draft EIS/EIR. All meetings were conducted in an “open house” format to allow participants to attend any time between 5:30 p.m. and 8:30 p.m. A brief presentation video was shown by the project team at 7 p.m. followed by a general Q&A session.

TABLE 1 PUBLIC SCOPING MEETING LOCATIONS

Date	Location	# of people signed-in	# comments	
			Oral	Written
April 22, 2008 Tuesday	Santa Clarita Activity Center 20880 Centre Point Parkway Santa Clarita, CA	14	20	9
April 23, 2008 Wednesday	Agua Dulce Women’s Club 33201 Agua Dulce Canyon Agua Dulce, CA	32	12	8
April 24, 2008 Thursday	Castaic Middle School 28900 Hillcrest Parkway Castaic, CA	3	0	0
April 28, 2008 Monday	Hughes-Elizabeth Lakes Union School 16633 Elizabeth Lake Road Lake Hughes, CA	52	36	30
April 29, 2008 Tuesday	Frazier Mountain High School 700 Falcon Way Lebec, CA	2	0	1
April 30, 2008 Wednesday	Hillview School 40525 Peonza Lane Palmdale, CA	14	4	11
May 1, 2008 Thursday	California City Middle School 9736 Redwood Blvd California City, CA	5	0	1
Totals		122	72	60

Along with the newsletter, the following handouts and materials were available at the public scoping meetings (See Appendix B-1):

- Basics to Electrical Transmission
- Project Map
- Fact Sheet
- Comment Form

Please refer to Appendix B-2 for information boards presented at the public scoping meetings. The formal video presentation shown at the public scoping meetings may be viewed at www.ladwp.com/barrenridge.

Newspaper Advertisements

The public scoping meetings were announced within the NOI, NOP, and newsletters. The meetings were also advertised in eight local newspapers. The newspapers are listed below in Table 2 and the advertisements are included within Appendix B-3. One of the eight advertisements was published in Spanish in the *La Opinion* newspaper. The advertisements provided a brief project description and meeting locations times and dates, and encouraged the public to attend the meetings.

TABLE 2. NEWSPAPERS UTILIZED FOR ADVERTISEMENT OF THE SCOPING MEETINGS.

Publication	Advertisement Dates
<i>Los Angeles Times</i>	April 7 and 14
<i>La Opinion</i> (Spanish)	April 8 and 14
<i>The Signal</i>	April 7 and 14
<i>Antelope Valley Press</i>	April 8 and 14
<i>The Daily Independent</i>	April 8 and 14
<i>The News Review</i>	April 9 and 16
<i>Mojave Desert News</i>	April 10 and 17
<i>Agua Dulce/Acton County Journal</i>	April 12 and 19

2.5 Agency and Elected Official Contacts

As indicated above, agencies and elected officials were distributed an NOP for review and comment on the project. Following the mailing of the NOP all agencies, federal, state and local, were contacted via phone to provide information on the Project as well as to determine interest to meet and discuss the Project. See Appendix B-4 for a table of agencies that were contacted.

LADWP's Legislative Affairs group also sent out letters to elected officials within the project areas, prior to the mailings of the NOP and Newsletters, to serve as an additional advance notification to be on the lookout for the forthcoming NOP, Newsletters and Scoping meetings. The letters also offered personal meetings with each representative, if they desired. (See Appendix B-5).

During the scoping period, LADWP's Legislative Affairs group also sent letters to Town Councils within the project area offering personal meetings with each group or representative.

(See Appendix B-6). Four Town Councils requested briefings and members of LADWP attended the meetings (see Table 3).

TABLE 3. TOWN COUNCIL MEETINGS.

Town Council	Date and Time	Location
Antelope Acres Town Council	June 18, 6 p.m.	47701 90 th St Antelope Acres
Association of Rural Town Councils	June 26, 7 p.m.	L.A. County Fire Station 129, Lancaster
Lakes Town Council	July 12, 8:30 a.m.	Lake Hughes Community Center 17520 Elizabeth Lakes Road Lake Hughes
Leona Valley Town Council	July 14, 7:30 p.m.	Leona Valley Community Center 8367 Elizabeth Lakes Road Leona Valley

2.6 Outreach

Forest Service, BLM and LADWP provided different modes for the public and agencies to ask questions or leave comments regarding the Barren Ridge Renewable Transmission Project. A toll-free hotline, e-mail address and website were established at the beginning of the scoping period and will be available throughout the Project's environmental review process.

Website

Information regarding the Barren Ridge Renewable Transmission Project is available at www.ladwp.com/barrenridge. The Notice of Intent, Notice of Preparation, newsletter, and all public review material are available on the website. The website will be updated throughout the environmental review period as information is made available. Additional information may also be available at www.fs.fed.us/r5/angeles/projects/ and www.ca.blm.gov/ridgecrest.

E-mail Address

An e-mail address was established for the Barren Ridge Renewable Transmission Project (BR RTP@powereng.com) to provide another mode of receiving comments. All comments received via e-mail were added to the project record and sent an automatic reply acknowledging receipt of the e-mail.

Toll-Free Hotline

A toll-free Project Hotline, (877) 440-3592, was provided as another means for leaving comments and receiving more information on the project. A call tree was established that gave callers the following options: 1) receive project information, 2) meeting and event updates, 3) project schedule, and 4) add callers to the mailing list or leave a question or comment. All messages were added to the project record.

Press Releases

On April 7, 2008 LADWP provided a press release announcing the launch of the environmental study for the Barren Ridge Renewable Transmission Project. (See Appendix C-1)

A press release was also provided by BLM on April 24, 2008 announcing the Notice of Intent to prepare a joint EIS/EIR for the Barren Ridge Renewable Transmission Project. (See Appendix C-2)

Forest Service's Quarterly Schedule of Proposed Action (SOPA) Report: This project was first published in the March/June Report. The project is also noted on the Forest website, which links to the official site (and was first uploaded the day scoping period began).

3 Scoping Comments Summary

This section summarizes the comments received from the public and agencies during the scoping period for the Barren Ridge Renewable Transmission Project EIS/EIR. The scoping review period was from April 7, 2008 to May 8, 2008; however, all comments received through July 2008 have been incorporated into the Scoping report. A total of 231 comments were received during the scoping period. The comments were received at the scoping meetings, via phone, e-mail, and mail. If multiple comments covering the same subject or concern were received, those comments were counted as one comment.

TABLE 4. SCOPING COMMENTS BREAKDOWN

# of Comments	
132	Scoping Meeting Comments (oral and written)
59	Public
34	Agencies
2	Native American Tribes
4	Town Councils

To help Forest Service, BLM and LADWP determine the scope and significant issues to be analyzed in the Draft EIS/EIR, written and verbal comments were included in the scoping comment analysis. Below is a summary of the issues and comments that were raised by the public and agencies. Appendix D-1 presents a comprehensive summary table of comments received during public scoping. Please refer to Appendix D-2 for a map of project alternatives referenced in the comments. Appendix E contains letters from Government Agencies and Native American Tribes.

3.1 Project Need and Objectives

The public expressed concerns regarding the transmission of renewable energy to the Los Angeles basin. The amount of renewable energy available to LADWP from the Tehachapi and Mojave was questioned. Other utility companies like SDG&E and SCE have plans to use the same renewable resource areas. Some commenters expressed that the City of Los Angeles should generate renewable energy within the City and not in rural areas.

Criteria for the amount of future energy requirements and need for building future transmission lines need to be determined. Can other renewable energy projects meet the needs of the Barren Ridge Renewable Transmission Project? LADWP and SCE should consider sharing or combining of transmission lines.

3.2 Alternatives

The agencies recommended that a range of alternatives be analyzed to ensure that avoidance and minimization of impacts to sensitive biological resources be included.

A large number of comments provided alternatives to the proposed project. Many residents recommended the use of tubular steel mono poles, instead of lattice steel structures, and/or undergrounding of transmission lines. Some residents recommended the use of only one tower-system (multi-circuits) to accommodate needs of existing towers and the new towers being proposed. Minor modifications to the proposed routes and alternatives that minimize impacts to parcels were also suggested. One modification suggested was along the Burnet property that would parallel 110th Street connecting Segments F and H. The second modification was around the community of Green Valley. Residents of Green Valley proposed a route that would be located just over the ridge west of Green Valley along an existing fire road. Direct Current (DC) lines were recommended as an alternative to the proposed alternating current (AC). Residents also requested the use of Niobium wire as an alternative to aluminum or copper wire. Residents in the project area also requested that the proposed transmission lines be located in designated utility corridors. Electrical generation within the City of Los Angeles was recommended to avoid additional transmission lines in rural communities.

BLM and Forest Service inquired about upgrading the electrical transmission system to a 500 kV instead of 230 kV transmission system.

LADWP engineers performed a preliminary power flow simulation on Segment D and found that the segment is problematic because it would not be capable of transferring more than 34 MW, or 46.75% of its intended rating of 800 MW, due to the congested South-of-Castaic path (between Castaic and proposed Haskell). The segment also presents issues with regard to constructability of the western half of the segment. This area parallels several SCE transmission lines, affords limited access due to the rugged terrain, pinch points occur where the existing transmission lines and pipelines have taken the more stable locations on the slopes, and would be located within existing landslides or areas that are landslide-prone.

3.3 Human Environment Issues

Air Quality

The Air Quality Management District raised concerns regarding the potential air quality impacts from all phases of the project. Of main concern is the construction of transmission lines and increased vehicular trips. USFS and BLM were concerned about construction equipment's impact on air quality. Also of concern were wildernesses, which are provided special consideration under the Clean Air Act. Pollution sources within 100 kilometers of wildernesses should be summarized to help determine their potential impact. Additional summaries are needed where project related emissions are expected to occur within 10 km of a wilderness. The Draft EIS/EIR should include these summaries and supporting discussions for all direct and indirect, construction, maintenance and long-term operations emissions that fall within these ranges. These wilderness-specific discussions and emission summaries should be included in the Draft EIS/EIR.

The EIS/EIR should include a standard conformity study and statement showing the action will not adversely impact air quality.

EMF

Many property owners were concerned about the increased EMF emissions, especially in corridors with existing high voltage transmission lines.

Fire Safety

Many residents in and adjacent to the Angeles National Forest were concerned that, during wildfires, additional above-ground transmission lines could adversely affect fire suppression efforts and compromise their safety.

BLM also expressed concern for fire suppression considerations, both on the ground and in the air, and the project's possible impact on fire suppression flight paths and staging areas. They also noted that transmission lines have gone down in desert areas and started fires.

Land Use/Recreation and Wilderness

Numerous property owners were concerned with the acquisition of private property, eminent domain and the expansion of transmission line rights of way and easements. Residences, agricultural farms, communities and rural areas are being traversed by transmission lines. Public lands are also being encroached upon for the addition of transmission lines.

Direct and indirect impacts to recreational facilities and trails need to be evaluated. Angeles National Forest, BLM-managed lands, State Parks, Antelope Valley California Poppy Natural Reserve, and Red Rock Canyon State Park are all areas of concern. The project should avoid adverse impacts to heavily used recreation areas and wildlife corridors and preserve open space.

The agencies are concerned about the expansion of transmission line rights of way that may impact current and future projects and developments in the project area. The Antelope Valley California Poppy Natural Reserve, Angeles National Forest, Pacific Crest Trail (PCT) and State, local and city parks may be affected by the proposed project and its alternatives. The Southern California Association of Governments (SCAG) requested that the project be consistent with its Regional Comprehensive Plan and Guide. USFS further expressed concern about the possibility of increased illegal off-highway vehicle use, and other unauthorized access, through the forest road systems due to increased access and improvements to existing roads. There is an eligible Wild and Scenic River Corridor in Segment G that may be impacted, and three proposed segments would cross the Pacific Crest Trail.

The Pacific Crest Trail Association (PCTA) requested that transmission lines be consolidated wherever possible, so as to affect one area of the trail, rather than many. The entire set of transmission lines along Alternative H (including SCE's existing 66 kV transmission line), located near USFS road 6N29, could be moved to a new location, keeping impacts to one area. Also, along Alternative I, if this route were selected, the PCTA asks that the line follow the existing 500 kV line due west until it crosses the PCT corridor, consolidating the impacts, and then head south. Alternatives C and D will impact PCTA's proposed reroute through Tejon Ranch. PCTA has plans to build a new trail, removing the PCT from the desert floor and relocating it to the crest of the Tehachapi Mountains. LADWP's suggested alternatives across the

northern section of the Antelope Valley would strongly interfere with the objectives of this reroute.

Communities impacted by the project request the ability to utilize transmission line easements for trails and community farms, and accessible, open space uses, as well as soccer fields and other types of playfields. Another suggestion was that purchase of nature preserves be considered.

Noise

Property Owners in close proximity to existing transmission lines as well as Pacific Crest Trail users already experience noise. They are concerned that additional transmission lines would increase noise to unacceptable values. Construction and maintenance activities may also increase noise for residents and trail users.

Property Values

Numerous property owners are concerned that the property values will decrease with additional transmission lines.

Public Health and Safety

Residents are concerned about the possible impacts to public health and the environment, and access to emergency response and information. Also of concern is that the roads built to construct and maintain the transmission lines will invite illegal off-road activity along transmission easements that may pose a safety threat to adjacent residents.

Public Services and Utilities

Effects of multiple siting of high voltage transmission lines should be addressed. Coordination and sharing of transmission lines with other utility companies (like SCE and SDG&E) should be considered. New waste, hazardous waste generation, and increased traffic during construction need to be addressed in the Draft EIS/EIR.

Traffic

The Department of Transportation and City of Lancaster are concerned about the potential for encroachment upon State transportation facilities and local roads. The Department of Public Works was concerned with the expected increase in traffic due to construction activities in the area.

Visual Resources

A significant concern from property owners in the project area were visual impacts to homes, communities, and business. Also of concern were impacts to public spaces like parks, trails, the Angeles National Forest, Pacific Crest Trails, and Antelope Valley California Poppy Reserve

Concerns regarding Red Rock Canyon State park were also received. Commenter was concerned that the additional lighting from the towers and turbines would adversely affect astronomy clubs.

USFS expressed concern about possible impacts to Highway 2, which is a Scenic Byway. The agency further stated the desire for micro-pile construction, as USFS is of the opinion that they have less visual impact.

3.4 Natural Environment Issues

Biological Resources

Significant concerns from many agencies, organizations, and the public were raised regarding the potential direct, indirect, and cumulative impacts to rare, threatened, endangered and special status species and habitats. Of particular concern were wildlife movements and migration paths. The San Andreas Rift Zone Significant Ecological Area (SEA) is an important biological resource area that supports several habitat types considered sensitive by resource agencies. It is located in the western portion of the Antelope Valley in an unincorporated area of Los Angeles County. Due to its unique location and the large variation in elevation and topography, vegetation within the SEA is extremely diverse. Wildlife in the SEA is also diverse and abundant due to the large acreage of natural open space and diversity of habitat types. Several important linkages for wildlife movement are included in the SEA.

USFS has considerable concern for Riparian Conservation Areas throughout the forest lands, and the potential impacts of long-term maintenance plans for the access roads on these and other sensitive areas. They are also concerned about the potential spread of invasive plant species (including noxious weeds) during the construction process of the project, in addition to trash and micro-trash generated during construction, the effects of construction and maintenance noise on sensitive species, and increased illegal hunting and plant-collecting activity due to construction.

USFS requested quantitative data on habitat change as a result of the proposed project to address impacts to threatened and endangered species and management indicator species. A Biological Evaluation/Biological Assessment based on site surveys for threatened, endangered and sensitive species on all project-affected areas should be developed.

BLM expressed some concern regarding potential increased raptor predation of sensitive species due to the use of lattice towers. BLM needs to assure the concerned and/or interested public that all actions approved under the EIS/EIR will be done to ensure that no unnecessary or undue impacts will occur to any species, with special attention and emphasis being shown to nationally listed Threatened and Endangered Species and California Species of Special Concern.

Cultural Resources

Cultural resources have been reported at or near the proposed route, the Historic Cochems Ranch Homestead (Alternative H), and R-Ranch in Leona Valley. USFS has concerns about the Old Ridge Route on Segment D, which is a nationally listed historical district that includes an historic ¼-mile wide, 17 ½-mile long paved road from 1911. This road may be adversely affected by increased traffic due to improved access, and visual impacts to the district must be avoided. USFS also identified prehistoric habitation and historic mining sites on Segment G, through Drinkwater Flats (east of San Francisquito). Further, there are large prehistoric village sites just west of the forest lands, along Segment I.

BLM needs to assure the concerned and/or interested public that all cultural resources will be assessed and managed in accordance with the protocol established with the California State Historic Preservation Office and the National Advisory Council on Historic Places. BLM also needs to assure the various interested/affected Tribes and/or Tribal Members that full consultation with them will be conducted.

Cumulative Impacts

A number of agencies were concerned about the cumulative impacts of past, present and future projects in the project area. The cumulative impacts from other transmission line projects should be considered. Cumulative impacts to biological resources and parks would also be addressed.

BLM is concerned about all the developments occurring in the project area. There are a number of projects being planned or constructed: photo voltaic, transmission lines, parabolic trough, air force base, highways, pipelines, Sun creek Energy, Repower Horned Road, Oak Tree Road Repower, etc. BLM notes that a number of connected actions may occur because of the BR RTP. However, when considering cumulative impacts, all types of activities must be considered, not just the impacts from other transmission line projects (i.e., other surface-disturbing activities occurring within the area, e.g. new road construction, maintenance, and use; new pipeline construction, maintenance and use; increased off-road vehicle usage or play-area development, maintenance and use; development of wind energy and/or solar energy sites).

Earth Resources

USFS and BLM have both expressed concern with potential impacts on paleontological and mineralogical resources throughout the proposed project area, including sedimentary rocks on the Ridge Route Basin (Segment D) and fossils along the Garlock Fault (Segment A).

Hydrology and Water Quality

The Regional Water Quality Control Board raised concerns regarding stormwater run-off prevention and impacts to drainages, wetlands, Waters of the State, Waters of the U.S. and blue-line streams. The Department of Fish and Game opposed elimination of watercourses and/or the canalization of natural and manmade drainages or conversion of subsurface drains. Alternative Route H is located in a drainage basin/area of the Amargosa and watershed of the San Andreas (Leona) Rift Zone. SCAG encourages “watershed management” programs and strategies and water reclamation.

BLM was concerned about grading and sub-grading roads for maintenance causing a channeling effect for water direction by building up berms. It was suggested that roads should be built with a 3% grade so water will flow into the landscape. Water has high cutting ability and roads should be designed with the goal of keeping water flow minimal and flow velocity slow. The crown and ditch approach to road building is a bad approach, and roads should be designed with in-slope and out-slope instead. The crown and ditch method does not work on desert roads due to the water flow through the area.

3.5 Other Comments

Property owners in the project area had a number of suggestions. The City of Lancaster, Antelope Acres, Agua Dulce, and Saugus requested meetings in their communities. An extension of the public comment and review period was recommended. Increased notification to property owners to a half mile of the proposed route and alternatives was also requested. A publication in the Mountain Yodeler was suggested to inform residents in the project area. To gain more public interest for the project it was suggested that public mailings contain captions (i.e. “in your backyard”) and pictures of transmission line towers.

4 Next Steps in EIS/EIR Process

Comments received during the public scoping period will be considered during the preparation of the Draft EIS/EIR. Technical studies and screening of alternatives are currently being conducted. The anticipated completion of the Draft EIS/EIR is expected in summer 2009.

Although the public scoping period has ended (May 8, 2008), the Forest Service, BLM, and LADWP welcome your comments throughout the environmental review process. The public review of the Draft EIS/EIR is expected to commence in summer 2009 (45-day minimum). The Final EIS/EIR is expected in Fall/Winter 2009. The Forest Service and BLM are expected to issue a Record of Decision in Winter 2010. Also in Winter 2010, a Notice of Determination is expected to be issued by LADWP.