

# **RECORD OF DECISION**

## **Barren Ridge Renewable Transmission Project**

Environmental Impact Statement FES 12-34  
Case File Number: CACA-48871

## **Barren Ridge Renewable Transmission Project Decision to Grant and to Amend Right-of-Way**

United States Department of the Interior, Bureau of Land Management  
California Desert District  
22835 Calle San Juan De Los Lagos  
Moreno Valley, CA 92553

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Lead Agencies:

United States Department of the Interior  
Bureau of Land Management

United States Department of Agriculture  
Forest Service  
Angeles National Forest



# Table of Contents

Acronyms and Abbreviations	ii
Executive Summary	1
Decision Rationale	2
1. Decision	1
1.1 Background	1
1.2 Information Still Under Review Since the Final EIS/EIR	5
1.3 Decision Being Made	7
1.4 ROW Requirements	9
1.5 Future Changes to the Approved Project	10
1.6 Summary of Conclusions	10
2. Mitigation and Monitoring	10
2.1 Required Mitigation	10
2.2 Monitoring and Enforcement	11
2.3 Mitigation Measures Not Adopted	12
2.4 Statement of All Practicable Mitigation Adopted	12
3. Management Considerations	12
3.1 Decision Rationale	12
3.2 Relationship to Agencies, Plans, Programs, and Policies including Consultation	14
3.3 Land Use Plan Conformance	20
4. Alternatives	22
4.1 Alternatives Fully Analyzed	23
4.2 Alternatives Not Fully Analyzed	25
4.3 Agency Preferred Alternative	30
4.4 Environmentally Preferable Action Alternative	30
5. Public Involvement	30
5.1 Scoping	30
5.2 Draft EIS/EIR Public Comment Period	32
6. Final Agency Action	34
6.1 Right-of-Way Authorizations	34

## Figures

1. BR RTP Selected Alternative
2. BR RTP Selected Alternative Components on BLM-Managed Land

## Appendices

- A. Biological Opinion
- B. Programmatic Agreement
- C. Adopted Avoidance, Minimization, and Mitigation Measures provided in the Final EIS/EIR
- D. Environmental and Construction Compliance Monitoring Plan

# Acronyms and Abbreviations

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AC	Alternating current
ANF	Angeles National Forest
AO	Authorized Officer
APE	Area of Potential Effects
BA	Biological Assessment
BLM	Bureau of Land Management
BO	Biological Opinion
BR-RIN	Barren Ridge-Rinaldi
BR RTP	Barren Ridge Renewable Transmission Project
CAA	Clean Air Act
CDCA Plan	California Desert Conservation Area Plan
CDFG	California Department of Fish and Game
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CWA	Clean Water Act
DC	Direct current
DOD	U.S. Department of Defense
DOI	U.S. Department of Interior
ECCMP	Environmental and Construction Compliance Monitoring Plan
EIS/EIR	Environmental Impact Statement/Environmental Impact Report
EPA	U.S. Environmental Protection Agency
EPAct	Energy Policy Act of 2005
EPAct 05	Energy Policy Act of 2005
ESA	Endangered Species Act
FLPMA	Federal Land Policy and Management Act
kV	Kilovolt
L	Limited Use
LADWP	Los Angeles Department of Water and Power
MLDs	Most likely descendants

MOA	Memorandum of Agreement
MUC	Multiple Use Class
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOC	Notice of Completion
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NTP	Notice to Proceed
NWPs	Nationwide Permits
ORVs	Outstandingly Remarkable Values
PA	Programmatic Agreement
ROD	Record of Decision
ROW	Right-of-way
RPS	Renewable Portfolio Standard
RWQCB	Regional Water Quality Control Board
SCE	Southern California Edison
SIP	State Implementation Plan
SWRCB	State Water Resources Control Board
USACE	U.S. Army Corps of Engineers
USFS	U.S. Department of Agriculture, Forest Service
USFWS	U.S. Department of Interior, Fish and Wildlife Service



# Executive Summary

This document constitutes the Record of Decision (ROD) of the United States Bureau of Land Management (BLM) on the right-of-way (ROW) grant application for the Barren Ridge Renewable Transmission Project (BRRTP or Project). This ROD makes the following decision: it authorizes the Los Angeles Department of Water and Power (LADWP, the Applicant) to construct, operate, maintain, and decommission the BRRTP on BLM-managed public land in Kern and Los Angeles Counties, California (see Figure 1, Selected Alternative Components, and Figure 2, Selective Alternative Components on BLM-Managed Lands, of this ROD). This decision was analyzed in the Final Environmental Impact Statement/Final Environmental Impact Report for the BRRTP (Final EIS/EIR). A Notice of Availability (NOA) for the Final EIS/EIR was published by the United States Environmental Protection Agency (EPA) in the Federal Register on August 10, 2012.

This ROD approves the Proposed Action identified in the Final EIS/EIR, referred to here as the Selected Alternative. The Selected Alternative is also referred to as Alternative 2 and is the Agency Preferred Alternative in the Final EIS/EIR. The BRRTP Selected Alternative includes the following five Project components:

- Expansion of the existing Barren Ridge Switching Station
- Construction of a new switching station in Haskell Canyon
- Reconductoring of 76 miles of the existing Barren Ridge-Rinaldi (BR-RIN) 230 kV transmission line with larger-capacity conductor between the Barren Ridge Switching Station and Rinaldi Substation
- Addition of 12 miles of new 230 kV circuit on the existing double-circuit structures from Haskell Canyon to the Castaic Power Plant
- Construction of 61 miles of new 230 kV double-circuit transmission line from the Barren Ridge Switching Station to the proposed Haskell Canyon Switching Station

The new 61-mile 230 kV double-circuit transmission line for the Selected Alternative will begin at the Barren Ridge Switching Station and run south, paralleling LADWP's existing 230 kV BR-RIN and 500 kV Pacific Direct Current Intertie (PDCI) transmission lines. It will extend south from the unincorporated community of Mojave through the Antelope Valley and approximately one mile east of the Antelope Valley California Poppy Reserve before continuing onto National Forest System (NFS) lands and ending at the proposed Haskell Canyon Switching Station. The BRRTP approval will take the form of a Federal Land Policy and Management Act (FLPMA) ROW grant and confirmation of Project consistency with existing ROW grants in conformance with Title V of FLPMA and implementing regulations found at 43 Code of Federal Regulations (CFR) Part 2800.

These decisions reflect careful consideration of the information generated during the BRRTP environmental and cultural resource review processes. This ROD applies only to BLM-administered lands, and to the BLM's decisions on the BRRTP. Other agencies, including the United States Department of Agriculture, Forest Service (USFS) and LADWP, are responsible for issuing their own decisions and applicable authorizations for the BRRTP.

## **Decision Rationale**

Many factors have led the BLM to approve a ROW grant for the BRRTP and to confirm Project consistency with the existing ROW grants. This decision has taken into account the Administration's priority for diversifying the nation's energy portfolio to include renewable energy in an effort to gain energy independence, address climate change, and create jobs. This priority is balanced against the need to manage the public lands administered by the BLM for multiple uses, as required by the FLPMA, and to preserve the environmental resources and cultural heritage found on those lands.

The considerations underlying this decision were informed by the NEPA and National Historic Preservation Act (NHPA) processes, including the analysis presented in the EIS/EIR, and information obtained through public comment and NHPA Section 106 consultation. These considerations were also informed by government-to-government consultations with affected Indian tribes. After a careful review of all this information, the BLM finds that the public interest in developing transmission facilities on public lands justifies the issuance of a ROW grant and the confirmation of Project consistency with existing ROW grants.

The decisions made here reflect a careful balancing of many competing public interests in managing BLM-managed public lands. They are based on comprehensive environmental analysis and full public disclosure and involvement. The BLM engaged highly qualified technical experts to analyze the environmental effects of the BRRTP, considered a full range of alternatives for the Project, and fully addressed all comments and concerns identified by interested members of the public and affected tribes. To ensure that harms to cultural, biological, visual and other resources are minimized to the maximum extent practicable, stipulations have been adopted in the ROW grant to ensure compliance with all applicable laws, regulations, standards, guidelines, and policies. The BLM, USFS, U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Game (CDFG), LADWP, and other responsible agencies used their expertise and existing technology to address the important issues of environmental and cultural resource protection.

# Record of Decision

## Barren Ridge Renewable Transmission Project

### 1. Decision

#### 1.1 Background

This ROD for the BR RTP ROW grant and confirmation of Project consistency with existing ROW grants approves the construction, operation, maintenance, and decommissioning of the BR RTP Proposed Action on lands managed by the BLM, as analyzed in the BR RTP Final EIS/EIR. The Proposed Action, which is also referred to as Alternative 2 in the Final EIS/EIR and is the Agency Preferred Alternative, is referred to as the “Selected Alternative” in this ROD. The BR RTP Selected Alternative includes the following five project components:

- Expansion of the existing Barren Ridge Switching Station
- Construction of a new switching station in Haskell Canyon
- Reconductoring of 76 miles of the existing BR-RIN 230 kV transmission line with larger-capacity conductor between the Barren Ridge Switching Station and Rinaldi Substation
- Addition of 12 miles of new 230 kV circuit on the existing double-circuit structures from Haskell Canyon to the Castaic Power Plant
- Construction of 61 miles of new 230 kV double-circuit transmission line from the Barren Ridge Switching Station to the proposed Haskell Canyon Switching Station

The new 61-mile 230 kV double-circuit transmission line for the Selected Alternative will begin at the Barren Ridge Switching Station and run south, paralleling LADWP’s existing 230 kV BR-RIN and 500 kV PDCI transmission lines. It will extend south from the unincorporated community of Mojave through the Antelope Valley and approximately one mile east of the Antelope Valley California Poppy Reserve before continuing onto NFS lands and ending at the proposed Haskell Canyon Switching Station. The entire route will remain within designated utility corridors across both the BLM managed lands and the Angeles National Forest (ANF) and will parallel existing transmission lines. The Selected Alternative will have the potential to affect portions of unincorporated Kern and Los Angeles Counties; the unincorporated communities of Mojave, Willow Springs, Antelope Acres, Elizabeth Lake, Green Valley, and Saugus; and cities of Santa Clarita and Los Angeles.

Refer to Figure 1 for a map of the BR RTP Selected Alternative components. To implement the BR RTP on lands managed by the BLM, the following actions are being taken by the BLM:

- Granting of 3.7 miles of a new 200-foot-wide ROW adjacent to existing transmission lines for the new 230 kV double-circuit transmission line;
- Confirmation that 3.8 miles of reconductoring of the existing BR-RIN 230 kV transmission line is consistent with an existing ROW grant on BLM-managed lands (BLM Right-of-Way Grant LA-088876) as authorized by Congress in the Act of October 10, 1949; and
- Confirmation that 275 feet of new 230 kV circuit on existing double-circuit structures is consistent with an existing ROW grant on BLM managed lands (BLM Right-of-Way Grant RI-2811).

Refer to Figure 1-2 for a map of BRRTP Selected Alternative components located on BLM-managed lands. The Project site is located within the BLM's California Desert District in Kern and Los Angeles Counties. The granting of a new ROW and the reconductoring on existing ROW will be under the jurisdiction of the Ridgecrest Field Office. The new circuit on an existing ROW will be under the jurisdiction of the Palm Springs/South Coast Field office.

This new ROW approval will take the form of a FLPMA ROW grant and the confirmation of Project consistency with the terms of the existing ROW grants. The new ROW will be issued in conformance with Title V of FLPMA and implementing regulations found at Title 43 CFR Part 2800. The new ROW grant and the confirmation of Project consistency with existing ROW grants apply only to the BLM-managed public lands within the boundary of the Selected Alternative.

Under this ROD, a ROW grant will be issued to the Applicant for a term of 30 years, with an option to renew in accordance with 43 CFR 2807.22. Project activities occurring under existing ROW grants will follow the terms of the existing ROWs. The ROW grant and confirmation of Project consistency with existing ROW grants will allow the Applicant the right to use, occupy, and develop the BRRTP on BLM-managed lands.

LADWP may, on approval from the BLM, assign the whole ROW grant, or portions of the ROW grant, to another party in conformance with the Part 2800 ROW regulations. Construction of the Project may be phased; however, the BLM requires the initiation of Project construction within two years of the issuance of a ROW grant. In addition, initiation of construction will be conditioned on final approval by BLM of the construction plans. This approval will take the form of an official Notice to Proceed (NTP) for each phase or partial phase of construction. If the approved Project does not progress to construction or operation within the allotted time period under the grant, or if there is a substantial deviation in location or use, an amended application and additional review under NEPA may be required. Project construction is expected to begin no sooner than late 2012 with a target in-service date of early 2015.

The Project's ROW grant and confirmation of Project consistency with existing ROW grants incorporate and are conditioned upon implementation of the mitigation measures and monitoring programs identified in the Final EIS/EIR as amended by this ROD, which are provided in

Appendix C of this ROD; the Biological Opinion (BO) issued by the USFWS, which is provided in Appendix A of this ROD; and the NHPA Section 106 Programmatic Agreement (PA), which is provided in Appendix B of this ROD. It is also conditioned on the Applicant obtaining all other applicable local, state, and Federal approvals, authorizations, and permits.

## **1.1.1 Application/Applicant**

### **1.1.1.1 BLM ROW Grant Application**

The Applicant, LADWP, is proposing to construct, operate, maintain, and decommission the BR RTP. In February 2007, the Applicant submitted a ROW application and initial Plan of Development (POD) to the BLM to construct, operate, maintain, and decommission the proposed Tehachapi Transmission Project in Kern and Los Angeles counties, which was subsequently renamed by LADWP as the Barren Ridge Renewable Transmission Project.

## **1.1.2 Purpose and Need**

### **1.1.2.1 BLM Purpose and Need for the Proposed Action**

In accordance with sections 102(a)(7), 103(c), and 202(c) of the FLPMA, public lands are to be managed for multiple uses that take into account the long-term needs of future generations for renewable and non-renewable resources. The Secretary of the Interior is authorized to grant rights-of-way on public lands for systems for generation, transmission, and distribution of electric energy (Section 501(a)(4), 43 U.S.C. 1761(a)(1)). Taking into account the BLM's multiple use mandate, BLM's purpose and need for action is to respond to a FLPMA ROW application submitted by LADWP for a ROW grant. This grant will authorize the construction, maintenance, operation and decommissioning of the proposed 230 kV transmission lines (and ancillary improvements) on public lands administered by the BLM in accordance with BLM ROW regulations and other applicable Federal laws and policies.

In conjunction with FLPMA, the BLM's applicable guidance includes the following:

- Executive Order 13212, dated May 18, 2001, 66 FR 28357 (May 22, 2001), which sets forth a policy that agencies shall take appropriate action, consistent with applicable laws, to expedite projects that will increase the production, transmission, or conservation of energy in a safe and environmentally sound manner.
- Section 211 of the Energy Policy Act of 2005 (EPA 05 or EPA 05), which established a goal for the DOI (BLM's parent agency) to approve at least 10,000 megawatts of non-hydropower renewable energy power on public lands by 2015.
- Secretarial Order 3285A1, Renewable Energy Development by the DOI, dated February 22, 2010. This Secretarial Order establishes the development of renewable energy as a priority for the DOI and creates a Departmental Task Force on Energy and Climate Change. It also announced a policy goal of identifying and prioritizing specific locations (study areas) best suited for large-scale production of solar energy and other renewables.

### 1.1.3 BLM Authority

#### 1.1.3.1 *Federal Land Policy and Management Act of 1976*

The FLPMA, 43 U.S.C. 1701 et seq., establishes public land policy for the management, protection, development, and enhancement of public lands. At 43 U.S.C. 1761, it sets forth the BLM's authority to grant ROWs for the generation, transmission, and distribution of electrical energy as follows:

(a) The Secretary, with respect to the public lands ... [is] authorized to grant, issue, or renew ROWs over, upon, under, or through such lands for:

(4) systems for generation, transmission, and distribution of electric energy

The FLPMA is relevant to the BRRTTP because it establishes BLM's authority to grant a ROW on public lands for the generation, transmission, and distribution of electrical energy. Because the FLPMA authorizes the issuance of a ROW grant for electrical transmission facilities, the BRRTTP will be consistent with the FLPMA.

In Section 102(a)(8) of FLPMA, Congress declared that it is the policy of the United States that:

... the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use" (43 U.S.C. 1701(a)(8)).

Section 202 of FLPMA and the regulations implementing FLPMA's land use planning provisions (43 CFR subparts 1601 and 1610) provide a process and direction to guide the development, amendment, and revision of land use plans for the use of the public lands.

Title V of FLPMA (43 U.S.C. 1761-1771) authorizes the BLM, acting on behalf of the Secretary of the Interior, to authorize a ROW grant on, over, under, and through the public lands for systems for generation, transmission, and distribution of electric energy. The BLM's implementation of its statutory direction for ROW authorizations is detailed in 43 CFR Part 2800. The BLM Authorized Officer (AO) administers the ROW authorization and ensures compliance with the terms and conditions of the ROW. The AO is any employee of the Department of the Interior to whom the authority to perform the duties described in 43 CFR Part 2800 has been delegated. This authority is derived from the authority of the Secretary of the Interior, and may be revoked at any time. The authority to approve all actions pertaining to the granting and management of Title V ROWs on public lands is delegated to the respective BLM State Directors (BLM Manual 1203, Appendix 1, p.33). In California, the authority of the BLM State Director to approve actions pertaining to the granting and management of Title V ROWs has been further delegated to the Field Managers.

The authority to issue this ROW grant and confirm Project consistency with existing ROW grants has been delegated to the Field Manager of the Ridgecrest Field Office. The Field Manager of

the Ridgecrest Field Office will be responsible for managing the ROW grant for BR RTP and Project activities on existing ROW within its jurisdiction. The Field Manager of the Palm Springs Field Office will be responsible for managing Project activities on existing ROW within its jurisdiction.

### **1.1.3.2 National Environmental Policy Act**

Section 102(c) of NEPA (42 U.S.C. 4321 et seq.) and the Council on Environmental Quality (CEQ) and DOI implementing regulations (40 CFR Parts 1500–1508 and 43 CFR 46) provide for the integration of NEPA directives into agency planning to ensure appropriate consideration of NEPA’s policies and to eliminate delay.

When taking actions such as approving ROW grants, the BLM must comply with the applicable requirements of NEPA and the CEQ’s NEPA regulations. Compliance with the NEPA process is intended to assist Federal officials in making decisions about a project that are based on an understanding of the environmental consequences of the decision, and identifying actions that protect, restore, and enhance the environment. The Draft EIS/EIR, Final EIS/EIR, and this ROD document the BLM’s compliance with the requirements of NEPA with respect to the BR RTP.

### **1.1.3.3 California Desert Conservation Area Plan**

The BLM manages public lands in the California Desert District pursuant to the CDCA Plan, as amended. The CDCA Plan requires that all transmission lines over 116 kV are placed within a designated corridor or considered through the planning process. On BLM-managed land, all portions of the Selected Alternative within the CDCA are entirely within a designated corridor.

## **1.2 Information Still Under Review Since the Final EIS/EIR**

Since the preparation and publication of the Final EIS/EIR, the applicant has been completing ongoing coordination with several agencies. The BO has been issued by the USFWS to conclude the Section 7 consultation process. The BO is included as Appendix A of the ROD. The PA has been finalized and signed by LADWP, BLM, USFS, and the California State Historic Preservation Officer (SHPO). The PA is included as Appendix B of this ROD.

In response to a request from the Kern County Roads Department, General Practice GP-32 has been revised. In Chapter 2, Table 2-8, *BR RTP General Practices*, beginning on page 2-91 of the Final EIS/EIR, General Practice GP-32 has been revised to replace the word “~~shall~~” with the word “~~shall~~” in two locations. The revised General Practice GP-32 now reads: “Any damage to local paved roadways caused by Project construction and/or maintenance shall be repaired and the roadways shall be restored to their previous condition.”

A letter addressed to the BLM regarding the BR RTP Final EIS/EIR was received from the EPA Region 9 on September 10, 2012. While the EPA expressed satisfaction with the majority of responses to their comments on the Draft EIS/EIR, the EPA was dissatisfied with the response to their comment regarding the timing for the Jurisdictional Determination (JD). The letter stated

that, without the completion of an approved JD, the water resources analysis in the Final EIS/EIR is not sufficient to make a determination of environmentally preferred and lowest impact alternative (and Least Environmentally Damaging Practicable Alternative). The EPA recommended that the ROD include the results of an approved JD as well as a discussion of all avoidance and mitigation measures, an outline of a compensatory mitigation plan, and a commitment to the timely implementation of a wetland/riparian mitigation plan.

In response to these comments, it is reiterated that it is neither practical nor typical in the analysis of transmission lines to complete a JD upon all Alternatives considered in the environmental analysis. For BRRTP, to complete a JD for the new transmission line component of the four Action Alternatives would require the completion of a JD for approximately 220 linear miles of transmission line alternative routes, when the selected Alternative includes only 62 miles. It is unlikely that the U.S. Army Corps of Engineers (USACE) would support the completion of a JD for each of the Action Alternatives even if it were deemed practical or desirable by the lead agencies. Additionally, because NEPA requires equal consideration of the Alternatives, it would not be appropriate under NEPA to complete a JD for only a single Alternative, even the identified selected Alternative.

The Final EIS/EIR provided a full and complete water resources analysis using a number of primary and secondary data sources including inventory and assessment of surface water resources by geographic information system using the National Hydrography Dataset, geospatial wetlands digital data from the National Wetland Inventory, high-resolution digital photography, U.S. Geographical Survey topographic maps, and field checking of alternatives. This analysis, which was conducted uniformly for each action Alternative considered in the Final EIS/EIR, was sufficient to make a determination of the environmentally superior and lowest impact alternative.

Numerous avoidance and mitigation measures are adopted in the ROD to avoid and minimize impacts to water resources. See Appendices C and D of this ROD for a complete list of these measures. The timely implementation of wetland/riparian mitigation is ensured by the incorporation of these measures in the ROD.

While the ultimate location of each tower footprint cannot be determined until the completion of final design, due to the design flexibility inherent to transmission line design coupled with the Construction, Operation and Maintenance Plan and POD processes, impacts to wetlands or jurisdictional waters are not expected. Such sensitive features can typically be avoided or spanned by adjusting tower placement or other ancillary construction site configuration, as needed (e.g., pulling and tensioning sites). After the completion of final design, a JD will be completed during the permitting process and in coordination with the USACE and Regional Water Quality Control Boards (RWQCBs). Authorization for construction will be conditioned upon this permitting pursuant to the Clean Water Act (CWA). In the unexpected event that impacts to waters cannot be avoided, a compensatory mitigation plan would be developed as required and further measures to reduce or eliminate impacts would be implemented. Because it is considered unlikely that a compensatory mitigation plan will be required for the

implementation of the selected Alternative, an outline of such a plan is not viewed by the agencies to be necessary at this time.

## **1.3 Decision Being Made**

### **1.3.1 Right-of-Way Grant and Consistency with Existing ROW Grants**

Under FLPMA, the BLM is responsible for processing requests for ROW grant applications to determine whether and to what extent to authorize requests such as renewable energy projects and other appurtenant facilities on land it manages (43 U.S.C. 1761(a), 1764(a)). Since the Project would be sited on lands managed by the BLM, the Applicant applied for a ROW grant from the BLM pursuant to FLPMA and the BLM's ROW regulations. The BLM concludes that the area approved by the ROW grant and the areas found to be consistent with existing ROW grants as shown in the ROD Figures 1 and 2 is the property to be occupied and that is required for constructing, operating, maintaining, and decommissioning the authorized facilities on BLM-managed lands. In addition, the BLM has included grant conditions—based on the Final EIS/EIR, the BO, the PA, and other applicable Federal rules and regulations (any and all of which may be amended)—to protect public health and safety, prevent unnecessary damage to the environment, and ensure that the Project will not result in unnecessary or undue degradation of public lands. The ROD requires the Applicant to secure all necessary local, state, and Federal permits, authorizations, and approvals. Upon receipt of the NTP(s), and by remaining in compliance with the ROW grant, the Applicant will be able to construct, operate, maintain, and decommission the BRRTP on BLM-managed lands.

### **1.3.2 What is Not Being Approved**

As discussed in Final EIS/EIR Chapter 2, *Alternatives Including the Proposed Action*, four alternatives were developed in addition to the Proposed Action for full consideration. In addition to the Proposed Action, which is also referred to as Alternative 2 and is the Selected Alternative in this ROD, the Federal and State lead agencies identified the No Action Alternative and three Action Alternatives: Alternative 1, Alternative 2a, and Alternative 3. While it is noted that, due to the limited amount of BLM-managed lands impacted by the BRRTP, BLM actions required for implementation of any of the Action Alternatives would be the same, the Alternatives not selected—the No Action Alternative and three Action Alternatives—are described below.

#### **1.3.2.1 No Action Alternative**

Under the No Action Alternative, the construction of the new 230 kV transmission line, addition of a new circuit on existing structures from Haskell Canyon to the Castaic Power Plant, reconductoring of the existing BR-RIN 230 kV transmission line, construction of a Haskell Canyon Switching Station, and expansion of the existing Barren Ridge Switching Station would not occur. Current, ongoing operation and maintenance activities for existing transmission line and switching station facilities in the Project area would continue by utility maintenance personnel.

### **1.3.2.2 Action Alternatives**

Each action Alternative includes the construction, operation, maintenance, and decommissioning of the same five Project components, listed below, but proposes alternate routes for the proposed 230 kV double-circuit transmission line from the Barren Ridge Switching Station to the proposed Haskell Canyon Switching Station:

- 1) Expansion of the existing Barren Ridge Switching Station;
- 2) Construction of a new switching station in Haskell Canyon;
- 3) Construction of a new 230 kV double-circuit transmission line from the Los Angeles Department of Water and Power (LADWP) Barren Ridge Switching Station to the proposed Haskell Canyon Switching Station (item #2 above); length of the transmission line would vary by Alternative;
- 4) Reconductoring of 76 miles of the existing BR-RIN 230 kV transmission line with larger-capacity conductors between the Barren Ridge Switching Station and the Rinaldi Substation;
- 5) Addition of 12 miles of new 230 kV circuit on the existing double-circuit structures from Haskell Canyon to the Castaic Power Plant.

#### **Alternative 1**

The new 230 kV double-circuit transmission line for Alternative 1 would be 86 miles long and run from the Barren Ridge Switching Station to the unincorporated community of Mojave, while paralleling LADWP's existing 230 kV BR-RIN and 500 kV PDCI transmission lines. It would continue south-southwest to parallel the Los Angeles Aqueduct to Lancaster Road, where it would travel west to the Interstate 5 utility corridor. It would then run southeast along LADWP's existing Castaic – Rinaldi corridor to the proposed Haskell Canyon Switching Station.

#### **Alternative 2a**

The 230 kV double-circuit transmission line in Alternative 2a would be 63 miles long and would be very similar to the Proposed Action, with 56 miles of the same alignment. Alternative 2a would begin at the Barren Ridge Switching Station and run south, paralleling LADWP's existing 230 kV BR-RIN and 500 kV PDCI transmission lines. It would travel south from the unincorporated community of Mojave through the Antelope Valley and approximately one mile east of the Antelope Valley California Poppy Reserve before continuing onto NFS lands and ending at the proposed Haskell Canyon Switching Station. The route would remain within designated utility corridors and would parallel existing transmission lines, with the exception of the nearly seven miles that would be routed around the unincorporated community of Green Valley. The Green Valley re-route would run outside of existing utility corridors through the ANF. The re-route would rejoin the existing corridor south of the unincorporated community of Green Valley before continuing south and ending at the proposed Haskell Canyon Switching Station.

#### **Alternative 3**

The proposed 230 kV double-circuit transmission line in Alternative 3 would be 76 miles long and would begin at the Barren Ridge Switching Station and run south, paralleling LADWP's

existing 230 kV BR-RIN and 500 kV PDCI lines. It would travel south from the unincorporated community of Mojave through the Antelope Valley and approximately one mile east of the Antelope Valley California Poppy Reserve before continuing southeast past Southern California Edison's (SCE's) Antelope Substation. The route would then travel toward the city of Palmdale, parallel to SCE's existing high-voltage transmission lines. It would turn sharply south to parallel LADWP's existing Victorville – Rinaldi 500 kV and Adelanto – Rinaldi 230 kV transmission lines. This Alternative would then parallel these transmission lines west, crossing two miles of the ANF. The Alternative would then parallel LADWP's 500 kV PDCI line north to the proposed Haskell Canyon Switching Station.

### **1.3.2.3 Other Alternatives Considered**

As discussed in Final EIS/EIR Section 2.3, *Alternatives Considered and Eliminated from Detailed Analysis*, other generation, design, and routing alternatives were considered but eliminated from detailed analysis. Two additional Alternatives, Three-Circuit Towers and the Green Valley Multi-Line Relocation Alternative, were considered in response to comments received on the Draft EIS/EIR and were eliminated from detailed analysis.

After consideration of the impact analysis in the Draft and Final EIS/EIR and comments from the public, Federal and state agencies, local groups, and individuals, the BLM identified the BLM Preferred Alternative. This ROD addresses the Project components of the BLM Preferred Alternative, which is referred to as the Proposed Action and Alternative 2 in the Final EIS/EIR and the Selected Alternative in this ROD. The rationale for this decision is discussed in Section 3.1 of this ROD.

## **1.4 ROW Requirements**

The BLM uses SF 2800-14 (ROW Lease/Grant) as the instrument to authorize the ROW grant for the Project; it includes all terms, conditions, stipulations, and measures required as part of the grant authorization. Consistent with BLM policy, the BRRTP ROW grant will include a development and performance bonding requirement for installation of facilities consistent with the final POD. The holder shall complete construction within the timeframes approved in the POD, but no later than 24 months after start of construction or as otherwise approved by the BLM.

Prior to the termination of the ROW authorization, a final decommissioning plan will be developed in compliance with the standards and requirements for closing a site and will be circulated for approval by interested agencies. The ROW grant potentially could be renewed by the Applicant; however, according to 43 CFR 2805.15, the BLM retains the right to determine whether the ROW grant is renewable. If the Applicant chooses to seek renewal of the ROW grant, an application will be required. Upon review, the BLM would make a decision whether to renew the ROW grant based on compliance history and applicable Federal laws and regulations (43 CFR 2807.22(a)).

According to BLM policy (IM 2011-060, as it may be amended), a bond is required for all ROW grants to ensure compliance with the terms and conditions of the authorization and applicable

regulatory requirements. The bond will be reviewed periodically (at least every 5 years) by the BLM authorized officer to ensure adequacy of the bond.

## **1.5 Future Changes to the Approved Project**

At various times throughout the Project, the need for extra workspace may be identified. Similarly, changes to the Project requirements (e.g., mitigation measures, specifications) may be needed to facilitate construction or provide more effective protection of resources. The BLM and grant holder will work together to find solutions when adjustments are necessary for specific field situations to avoid conflicts with adopted mitigation measures or specifications.

The BLM Compliance Project Manager and Compliance Monitors will ensure that any deviation from the procedures identified under the monitoring program is consistent with NEPA and FLPMA requirements. No Project adjustment will be approved if it creates new significant impacts or substantially modifies the use or Project footprint. Adjustments will be limited to minor Project changes that will not trigger other permit requirements or create new or greater impacts and that clearly and strictly comply with the intent of the adopted mitigation measures, as they may be amended over time. A proposed Project change that has the potential for creating significant environmental effects or represents a substantial change to the location or use of the Selected Alternative will be evaluated to determine whether an amended application and/or supplemental NEPA analysis is required. In some cases, an adjustment may also require approval by other jurisdictional agencies.

## **1.6 Summary of Conclusions**

It is noted that due to the limited area of BLM-managed lands crossed by the BRRTP, all Action Alternatives would require the same grants and confirmation of Project consistency with existing ROW grants by the BLM. Nevertheless, the Selected Alternative for the BRRTP is the alternative that provides the most public benefits and avoids the most resource impacts. Potential impacts associated with the construction, operation, and maintenance of the Proposed Action and Alternatives to the proposed BRRTP (including the No Project Alternative) were identified and discussed for each resource in Chapter 4 of the Final EIS/EIR, *Environmental Impacts*. Impacts identified for each resource area and alternative were compared with those identified for the proposed Project, in terms of potential changes in the intensity, magnitude, and spatial and temporal extent of potential effects for NEPA.

## **2. Mitigation and Monitoring**

### **2.1 Required Mitigation**

The BRRTP includes the following measures, terms, and conditions:

- Terms and Conditions in the USFWS BO (Appendix A), as may be amended
- Terms and Conditions in the PA (Appendix B), as may be amended

- Adopted Avoidance, Minimization, and Mitigation Measures (Appendix C), as may be amended
- The Project's Environmental and Construction Compliance Monitoring Plan (ECCMP) (Appendix D). The ECCMP includes requirements to verify the implementation of and compliance with mitigation measures including preparation and implementation of plans such as, but not limited to, the Fugitive Dust Control Plan, Fire Prevention Plan, Weed Control Plan, and Habitat Restoration/Revegetation Plan. The BLM will use the process described in the ECCMP to ensure that the appropriate plans are completed prior to NTP issuance for actions affecting a particular resource or area and ultimately to ensure compliance with the terms and conditions of the ROW grant and applicable plans.

For compliance purposes, the complete language of these measures, terms, and conditions is provided in Appendix C of this ROD. These measures, terms, and conditions are determined to be in the public interest pursuant to 43 CFR 2805.10(a)(1), since they ensure the Project will be constructed, operated, maintained, and decommissioned in conformity with the decisions made by the BLM.

## 2.2 Monitoring and Enforcement

A monitoring and enforcement program shall be adopted where applicable for any mitigation (40 CFR 1505.2(c)). Agencies may provide for monitoring to ensure that their decisions are carried out. Mitigation and other conditions established in the Final EIS/EIR, as amended herein, or during its review and committed to as part of the decision shall be implemented by the lead agency or other appropriate consenting agency (40 CFR 1505.2(c), 1505.3). The lead agency shall:

- Include appropriate conditions in grants, permits or other approvals;
- Condition funding of actions on mitigation;
- Upon request, inform cooperating or commenting agencies on the progress in carrying out mitigation measures they have proposed and that were adopted by the agency making the decision; and
- Upon request and as permitted by law, make available to the public the results of relevant monitoring.

As the Federal co-lead agency for the BRRTP under NEPA, the BLM is responsible for ensuring compliance with all adopted mitigation measures for the BRRTP. The complete language of the measures adopted by BLM is provided in Appendix C of this ROD. The BLM will also incorporate these mitigation measures as terms and conditions of the grant. Failure on the part of the grant holder to adhere to these terms and conditions could result in administrative actions up to and including termination of the ROW grant and the removal of facilities and rehabilitation of all public land disturbances.

## **2.3 Mitigation Measures Not Adopted**

All the mitigation measures included in the Final EIS/EIR as amended by this ROD, BO, PA, and ECCMP are adopted and provided in Appendices A through D of this ROD. All BLM-identified mitigation measures have been adopted in this ROD.

## **2.4 Statement of All Practicable Mitigation Adopted**

As required in the BLM NEPA Handbook H-1790-1 and 40 CFR 1505.2(c), all practicable means to avoid or minimize the environmental harm from the alternative selected have been adopted by this ROD (Appendix C).

# **3. Management Considerations**

## **3.1 Decision Rationale**

This decision approves a ROW grant for the BRRTP and confirms Project consistency with existing ROW grants consistent with the Proposed Action and Selected Alternative as described above and in the Final EIS/EIR. The BLM's decision to authorize this activity is based on the rationale described throughout the ROD and as detailed in the following sections.

### **3.1.1 Respond to Purpose and Need**

As more thoroughly described in Section 1.1.2.1 herein, the BLM's purpose and need for the BRRTP is to respond to the Applicant's externally generated application under Title V of FLPMA for a ROW grant to construct, operate, maintain, and decommission a transmission facility on public lands in compliance with FLPMA, BLM ROW regulations, and other applicable Federal laws, as well as in furtherance of DOI renewable energy priorities and management objectives.

The Selected Alternative, which is also the applicant's Proposed Action as described in the Final EIS/EIR, meets the BLM purpose and need because it responds directly to LADWP's ROW application. As explained in the Final EIS/EIR, the construction, operation, maintenance, and decommissioning activities associated with the Selected Alternative, either singularly or with mitigation, are in conformance with the applicable regulations and following land use plans and BLM policies:

- BLM CDCA Plan of 1980, as amended
- BLM policy and guidance for issuing ROW grants.

### **3.1.2 Achieve BLM Goals and Objectives**

The Selected Alternative will meet the BLM purpose and need, reduce the environmental impacts associated with greenhouse gas emissions, assist LADWP in meeting renewable energy goals, assist LADWP in meeting its future electrical energy needs, allow interconnection and expansion of LADWP's renewable energy in the Tehachapi Mountains and Mojave Desert areas, increase

LADWP's system reliability, enable the delivery of renewable energy to the City of Los Angeles, and help achieve Federal and State objectives for renewable energy development. The Project complies with the CDCA Plan, as amended. Additionally, the BLM consulted extensively with affected Native American tribes and other responsible parties to modify the BRRTP to minimize impacts to biological, visual, cultural and other resources.

### **3.1.3 Incorporate CDCA Plan Management Considerations**

Because the portions of the Selected Alternative within the CDCA are located entirely within existing designated corridors, a CDCA Plan Amendment is not necessary.

### **3.1.4 Statement of No Unnecessary or Undue Degradation**

Congress declared that the public lands be managed for multiple use and sustained yield and in a manner to protect certain land values, provide food and habitat for species, and provide for outdoor recreation and human occupancy and use (43 U.S.C. 1701(a)(7), (8)). Multiple use management means that public land resources are to be managed to best meet the present and future needs of the American public, taking into consideration the long term needs of future generations without permanent impairment of the lands (43 U.S.C. 1702(c)). BLM manages public lands through land use planning, acquisition, and disposition, and through regulation of use, occupancy, and development of the public lands (Subchapters II and III, respectively, 43 U.S.C. 1711 to 1723, and 1731–1748).

FLPMA specifically provides that in managing the use, occupancy, and development of the public lands, the Secretary shall take any action necessary to prevent unnecessary or undue degradation of the lands (43 U.S.C. 1732(b)). The process for siting and evaluating the BRRTP has included extensive efforts on the part of BLM, USFS, LADWP, other agencies, and members of the public to identify a project that accomplishes the purpose and need and other project objectives while preventing any unnecessary or undue degradation of the lands. These efforts have included:

- Siting of the proposed new transmission line entirely within designated utility corridors on Federal land.
- Modification of the Proposed Action to utilize three-circuit towers in areas with ROW expansion constraints to avoid acquisition of private residences and to avoid or minimize wildfire and fuels impacts and impacts to other resources.
- Evaluation of a range of alternatives that could meet the purpose and need for the proposed Project, but result in the avoidance and/or minimization of impacts.

In addition, BLM ROW regulations at 43 CFR 2805.11(a)(1) to (5) require BLM to limit the grant to those lands which:

1. Will be occupied with authorized facilities;

2. Are necessary for constructing, operating, maintaining, and terminating the authorized facilities;
3. Are necessary to protect the public health and safety;
4. Will not unnecessarily damage the environment; and
5. Will not result in unnecessary or undue degradation.

The lands described in Section 1.1 of this ROD are necessary to accommodate the Selected Alternative. All temporary disturbances associated with construction activities will be restored immediately to minimize erosion in accordance with approved restoration and revegetation plans. Public health and safety will not be compromised by construction of the Selected Alternative, as work areas will be posted and public access to those areas controlled to prevent possible injury to the public.

Based on the comparative analysis of the ability of each alternative to meet the purpose and need, and the environmental impacts that would be associated with each alternative as discussed in the Final EIS/EIR and as summarized previously, the Selected Alternative is identified by the BLM as an alternative that does not unnecessarily damage the environment or create unnecessary or undue degradation of public lands.

The BR RTP meets the requirements of applicable ROW regulations inasmuch as it includes terms, conditions and stipulations that are in the public interest; prevents surface disturbance unless and until an NTP is secured; is issued for a period of 30 years, subject to potential renewal and periodic review; and contains diligence and bonding requirements to further protect public land resources. This approval provides that public land will be occupied only with authorized facilities and only to the extent necessary to construct, operate and maintain, and decommission the Project. The BLM's grant contains terms and conditions that provide for public health and safety and protect the environment and public lands. The terms and conditions include compliance with this ROD, the Final EIS/EIR, the BO, and the PA, as may be amended.

The foregoing provides the basis for this ROD's determination that the BR RTP will not unnecessarily or unduly degrade the public lands within the Project site.

## **3.2 Relationship to Agencies, Plans, Programs, and Policies including Consultation**

Federal statutes require that specific actions be completed prior to issuing a ROD for the Project. Specifically, LADWP must secure a BO pursuant to the Endangered Species Act (ESA), concurrence from the USFWS on the Project's Avian Protection Plan, and a PA under the NHPA. Appropriate permits under the CWA must be secured prior to issuing an NTP.

### **3.2.1 Endangered Species Act Section 7**

Under Section 7 of the ESA, a Federal agency that authorizes, funds, or carries out a project that "may affect" a listed species or its critical habitat must consult with USFWS. Under Section 7 consultation, the lead agencies prepare a biological assessment (BA) that analyzes whether the

project is likely to adversely affect listed wildlife or plant species or their critical habitat, and proposes suitable avoidance, minimization, or compensatory mitigation measures. At the end of the consultation (135 days by regulation), the USFWS issues its BO determining whether the project is likely to jeopardize the species or result in adverse modification of critical habitat. If a “no jeopardy” opinion is provided, the project may proceed. If a jeopardy or adverse modification opinion is issued, the USFWS may suggest “reasonable and prudent alternatives” that would result in no jeopardy.

The BLM’s authorization of the requested ROW grant for the BRRTTP and confirmation of Project consistency with existing ROW grants, including the resulting consultation and coordination with the USFWS, complies with ESA Section 7 regarding potential take of desert tortoise and other listed species. The USFWS has jurisdiction over threatened and endangered species listed under the ESA. Formal consultation with the USFWS concluded with the September 18, 2012 issuance of a BO (Appendix A) for the BRRTTP focusing on potential impacts to desert tortoise. Implementation of the discretionary conservation measures identified in the BO will reduce potential adverse impacts to the identified species. The BO concluded that the levels of anticipated take associated with the BRRTTP are not likely to jeopardize the continued existence or significantly impair the recovery of the desert tortoise or other listed species. Implementation of terms and conditions to minimize take identified in the BO is mandatory and a condition of approval set forth in this ROD. The ROW grant for the Project contains a standard stipulation requiring compliance with the BO, as amended.

### **3.2.2 National Historic Preservation Act Section 106**

Section 106 of the NHPA (16 U.S.C. 470) requires Federal agencies to take into account the effects that their approvals and Federally funded activities and programs have on historic properties. “Historic properties” include those properties included in, or eligible for, the National Register of Historic Places (36 CFR 800.16(l)(1)). For the BRRTTP, the USFS (ANF regional office) is the lead Federal agency for Section 106 compliance.

#### **3.2.2.1 Programmatic Agreement**

The ANF, BLM Ridgecrest Field Office, LADWP, and California SHPO have prepared a PA outlining procedures, tasks, standards, and responsibilities for complying with Section 106 during planning, construction, operation, maintenance, and decommissioning of the BRRTTP. The executed Final PA is provided in Appendix B of this ROD. Required mitigation provides an opportunity to minimize the effects of the Project on cultural resources in accordance with NHPA Section 106 regarding potential impacts to cultural resources.

#### **3.2.2.2 Government-to-Government Consultation**

Various Federal statutes and regulations, including NEPA (40 CFR Parts 1501.2 and 1501.7) and the NHPA, require that agencies consult with American Indians. Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, was issued in 2000 in order to establish regular and meaningful consultation and collaboration with Tribal officials in the development of Federal policies that have Tribal implications, to strengthen the United States

government-to-government relationships with Indian Tribes, and to reduce the imposition of unfunded mandates upon Indian Tribes.

Regulations for Section 106 require that Federal agencies identify potentially affected Indian Tribes that might have knowledge of sites of religious and cultural significance in the Area of Potential Effects (APE) (36 CFR 800.3(f)(2)). If any such properties exist, the regulations require that Federal agencies invite Indian Tribes to participate in the Section 106 process as consulting parties. For BR RTP, the USFS (ANF regional office) is the responsible lead agency for Section 106 consultation with Native American Tribes.

In Spring 2008, the California Environmental Quality Act (CEQA) Notice of Preparation (NOP) for BR RTP was sent to 12 Native American Tribes, and comments from two Tribes were received during the scoping process for the Draft EIS/EIR. These were the Seven Feathers Corporation/San Fernando Band of Mission Indians and the Tribal Elders Council of the Santa Ynez Band of Mission Indians. In addition, a list of Tribes and Most Likely Descendants (MLDs) was received from the California Native American Heritage Commission (NAHC) in June 2008.

As required by the NHPA (36 CFR 800.2(c)(2); 36 CFR 800.3(f)(2); 36 CFR 800.14(b)(2); and 36 CFR 800.14(f)), the USFS has consulted the Federally recognized San Manuel Band of Mission Indians, Morongo Band of Mission Indians, and Santa Ynez Band of Mission Indians/Tribal Elders Council, as well as the Gabrieliño Group, Seven Feathers Corporation/San Fernando Band of Mission Indians, Owl Clan Consultants, and other interested parties (per 36 CFR 800.2(c)(5)).

Several Tribes responded to initial consultation letters sent by the USFS describing the proposed Project and requesting Tribal participation in the development of the PA. Concerns raised by Federally recognized Tribes and non-recognized Native American groups and individuals included:

- On May 12, 2008, the Seven Feathers Corporation/San Fernando Band of Mission Indians provided information regarding the availability of monitors during the construction phase of the Project. Additional concerns were expressed in October 2008.
- On June 9, 2008, the Morongo Band of Mission Indians commented to the ANF on aspects of the Project and requested updates as the project moves forward.
- On June 3, 2009, the Santa Ynez Band of Mission Indians/Tribal Elders Council requested that they be informed of the undertaking and suggested that a Native American monitor be present during ground disturbing activities. Once it was confirmed that local Tribes had been contacted regarding BR RTP, the Santa Ynez Band asked to be removed from further consultation.
- On June 30, 2009, the Owl Clan Consultants expressed concern about the Project and requested updates for the duration of the Project.

- The Chairperson of the San Manuel Band of Mission Indians was contacted on September 24, 2009. To date, he has not responded. However, several other Tribal representatives expressed interest in the Project or requested the presence of a Native American representative during construction monitoring.
- On September 30, 2009, a representative of the Gabrieliño Group expressed interest in the Project and requested updates as the Project moved forward.
- On November 4, 2011, a letter was received from the Agua Caliente Band of Cahuilla Indians stating that they had no concerns regarding the Project.

In addition to the consultation letters sent by the ANF, the agency's Tribal Liaison also held a meeting on April 18, 2009 for all members of local Native American Tribes to discuss a variety of issues, including BRRTP. In April 2012, the draft PA was submitted for formal review by SHPO staff. At the same time it was submitted to the SHPO, the draft PA was provided to participating Tribes, Native American contacts listed by the NAHC, and other interested Native American organizations, groups, and individuals for comment.

### **3.2.3 Bald and Golden Eagle Protection Act**

Bald eagle protection began in 1940 with the passage of the Eagle Protection Act, which was later amended in 1962 to include golden eagle and was renamed the Bald and Golden Eagle Protection Act. This Act makes it unlawful to import, export, take, sell, purchase, or barter any bald eagle or golden eagle, their parts, products, nests, or eggs (16 U.S.C. 668). "Take" includes pursuing, shooting, poisoning, wounding, killing, capturing, trapping, collecting, molesting, or disturbing (16 U.S.C. 668c). Exceptions may be granted by USFWS for scientific or exhibition use, or for traditional and cultural use by Native Americans (16 U.S.C. 668a). Permits may be subject to forfeiture if import, export, or commercial activities involving eagles occurs (16 U.S.C. 668b).

The BRRTP has the potential to impact eagles, which are protected under this Act. Mitigation measures and General Practices, including the creation of an Avian Protection Plan, have been developed for the Project to reduce the effects on raptors and eagles to a level that is not significant.

### **3.2.4 Clean Water Act**

The Federal CWA of 1977 (33 U.S.C. 1251-1376) is an amendment to the Federal Water Pollution Control Act of 1972, which outlined the basic structure for regulating discharges of pollutants to waters of the United States. Several sections of this act pertain to regulating impacts to wetlands. The discharge of dredged or fill material into waters of the United States is subject to permitting under Section 404 (33 U.S.C. 1344). Section 401 specifies additional requirements for permit review, particularly at the state level. The CWA is administered by the EPA and the USACE.

CWA Section 401 gives individual states the authority to issue, waive, or deny certification that a proposed activity conforms to state water quality standards. Projects, including those that require

permits from USACE under Section 404, are reviewed by the state's RWQCBs or the State Water Resource Control Board if more than one region is affected.

USACE and EPA regulate the placement of fill and dredged materials into waters of the United States under CWA Section 404. Waters of the United States include lakes, rivers, streams, and their tributaries, as well as certain wetlands with a significant nexus to traditional navigable waters (33 CFR 328.3(a)(3)). Tributary waters subject to USACE jurisdiction extend to the ordinary high water mark on opposing channel banks. Wetlands are defined for regulatory purposes as areas "undated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3(b)). Project proponents must obtain a permit from USACE for all discharges of dredged or fill material into waters of the United States, including wetlands, before proceeding with a proposed action. USACE may either issue individual permits on a case-by-case basis or general permits at a program level. General permits are pre-authorized and are issued to cover similar activities expected to cause only minimal adverse environmental effects. Nationwide permits (NWP) are a type of general permit issued to cover particular fill activities. NWP have a set of conditions that must be met for the permits to apply to a particular project and specific conditions that apply to each NWP.

For the BRRTP, National Pollutant Discharge Elimination System (NPDES) permits will be issued by the Lahontan and Los Angeles RWQCBs. In order to comply with NPDES regulations, a Stormwater Pollution Prevention Plan will be prepared for the construction activities prior to issuance of the NTP.

A Section 404 permit is required for construction activities involving the discharge of dredge or fill material into waters of the United States. In addition, a Water Quality Certification pursuant to Section 401 of the CWA is required for Section 404 permit actions. Appropriate permits and/or certification necessary for compliance with the CWA will be required prior issuance of the NTP and authorization of construction.

### **3.2.5 Clean Air Act**

The Clean Air Act (CAA), as revised in 1990 (42 U.S.C. 7401), requires the EPA and states to carry out programs intended to ensure attainment of National Ambient Air Quality Standards (NAAQS). The General Conformity Rule requires that Federal actions do not interfere with State programs to improve air quality in nonattainment areas.

The 1990 amendments to the Federal CAA Section 176 require the EPA to promulgate rules to ensure that Federal actions conform to the appropriate State Implementation Plan (SIP). These rules, known together as the General Conformity Rule (40 CFR 51.850-51.860 and 40 CFR 93.150-93.160), require any Federal agency authorizing an action in a nonattainment or attainment/maintenance area to determine that the action conforms to the applicable SIP or that the action is exempt from the General Conformity Rule (40 CFR 51.853). This means that Federally supported or funded activities would not (1) cause or contribute to any new Federal air quality standard violation, (2) increase the frequency or severity of any existing Federal standard

violation, or (3) delay the timely attainment of any Federal standard, interim emission reduction, or other milestone (40 CFR 51.853). Actions can be exempt from a conformity determination if an applicability analysis shows that the total direct and indirect emissions from construction and operation activities would be less than specified emission rate thresholds, known as *de minimis* limits, and that the emissions would be less than 10 percent of the area emission budget.

A comparison of the emissions of the BRRTP to the General Conformity Rule *de minimis* thresholds is included in Final EIS/EIR Chapter 4, Section 4.2.1, *Air Quality and Climate Change*. The estimated annual emissions during construction are expected to exceed the General Conformity Rule *de minimis* emission thresholds for NO<sub>x</sub> during some construction years; therefore, a comprehensive General Conformity analysis has been prepared as required prior to the issuance of this ROD.

### **3.2.6 United States Department of Defense**

The BLM coordinates with the U.S. Department of Defense (DOD) prior to approval of ROWs for renewable energy, utility, and communication facilities to ensure that these facilities would not interfere with military training routes. Edwards Air Force base was contacted and kept informed during the planning process as described in Chapter 7, *Coordination and Consultation*, in the Final EIS/EIR. No formal comments were received from the DOD or Edwards Air Force Base.

### **3.2.7 National Park Service**

The Secretary of the Interior is responsible for protecting units of the National Park System pursuant to the National Park Service's (NPS's) 1916 Organic Act (16 U.S.C. 1, 2, 3 and 4), which consists of the Act of August 25, 1916 (39 Stat. 535) and amendments thereto. The BRRTP is not located near NPS properties.

### **3.2.8 Consultation with State, Regional, and Local Agencies**

Section 5 of this ROD lists other Federal, state, regional, and local agencies with which the BLM and/or the Applicant have consulted as part of Project planning, scoping, and public review of the EIS/EIR. The Applicant may have to obtain permits or other authorizations from other agencies or comply with requirements of other agencies that did not provide written input during the NEPA process. Those agencies include, but may not be limited to, CDFG, State Water Resources Control Board (SWRCB)/RWQCB, Kern County and Los Angeles County.

#### **3.2.8.1 California Department of Fish and Game**

The CDFG protects fish and aquatic habitats within the State of California through regulation of modifications to streambeds under Section 1602 of the California Fish and Game Code. CDFG regulates activities that could divert, obstruct, or change the natural flow or the bed, channel, or bank of any river, stream, or lake in California that the agency has designated as one that is used by or provides benefit to a fish or wildlife resource. The agency also evaluates potential impacts to vegetation and wildlife resulting from disturbances to waterways during its permitting process. If CDFG determines that a project may substantially adversely affect fish and wildlife resources,

a Streambed Alteration Agreement is required. The Agreement includes reasonable conditions necessary to protect those resources and must comply with CEQA. The Applicant may proceed with the activity in accordance with the final Alteration Agreement. The BLM, USFS, and the Applicant will provide information to CDFG to assist the agency in its determination of the impacts of the Project to streambeds, and its identification of permit and/or mitigation requirements. A Streambed Alteration Agreement between CDFG and the Applicant for the Project will be completed prior to the NTP. Compliance with this Agreement is a condition of the ROW grant.

### **3.2.8.2 State Water Resources Control Board/Regional Water Quality Control Boards**

The SWRCB works in coordination with the nine RWQCBs to preserve, protect, enhance, and restore water quality. The RWQCBs have authority to protect surface water and groundwater under their jurisdiction. Throughout the NEPA process, the BLM, USFS, and the Applicant have invited the SWRCB and the Lahontan and Los Angeles RWQCBs to participate in the planning process and have provided information to assist the agencies in evaluating the potential impacts and permitting requirements of the Project. As noted above with respect to the CWA Section 404, construction of the Project that would impact resources regulated under the 404 permit will not be authorized without CWA Section 401 certification.

## **3.3 Land Use Plan Conformance**

### **3.3.1 CDCA Plan**

The FLPMA establishes public land policy for the management, protection, development, and enhancement of public lands. The FLPMA specifically establishes BLM's authority to grant ROWs for the generation, transmission, and distribution of electrical energy as follows:

- (a) The Secretary, with respect to the public lands ... [is] authorized to grant, issue, or renew rights-of-way over, upon, under, or through such lands for:
  - (4) systems for generation, transmission, and distribution of electric energy

The FLPMA is relevant to the BRRTP because it establishes BLM's authority to grant ROWs on public lands for the generation, transmission, and distribution of electrical energy. Because the FLPMA authorizes the issuance of a ROW grant for electrical generation facilities and transmission lines, the BRRTP will be consistent with the FLPMA.

The CDCA Plan was developed as mandated by the FLPMA and is the land use plan for the new transmission line and reconductoring components of BRRTP on BLM-managed lands. The CDCA Plan is a comprehensive, long-range plan for the management, use, development, and protection of the public lands in the CDCA. The 25-million acre CDCA contains over 12 million acres of public lands in the California desert, which includes the Mojave Desert, the Sonoran Desert, and a small part of the Great Basin Desert. Those 12 million acres of public lands are approximately half of the total land area in the CDCA. The site proposed for the BRRTP

includes approximately four miles of new transmission line, four miles of reconductoring of an existing transmission line, and 275 feet of new circuit on existing double-circuit structures within the CDCA administered by the BLM.

Goals and actions for each resource managed by the BLM are established in the 12 Elements in the CDCA Plan. Each Plan Element provides a Desert-wide perspective of the planning decisions for one major resource or issue of public concern as well as more specific interpretation of multiple use class guidelines for a given resource and its associated activities.

The BRRTP site within the CDCA Plan is classified in the CDCA Plan as Multiple Use Class (MUC) L (Limited Use). MUC L, the most restrictive multiple use classification in the Plan, —...protects sensitive, natural, scenic, ecological, and cultural resource values”. Public lands designated Class L are managed to provide for generally lower-intensity, carefully controlled multiple use of resources, while ensuring that sensitive values are not significantly diminished. However, the lands are also identified as a designated corridor in the CDCA Plan under the Energy Production and Utility Corridor Element, which designates a regional network of utility planning corridors. Within California, the proposed Project will be placed in and adjacent to an existing ROW within an established energy corridor that allows for electrical transmission of 161 kV and above. The CDCA Plan notes that utility planning corridors specifically address the expansion of utility facilities constructed for the purpose of telecommunications and bulk transfers of electricity, gas, water, petroleum, and other commodities. Expansion is defined in the element as the addition, construction, or major modification of a tower, pipe, or cable to accommodate the transfer of additional products. The BRRTP within the CDCA fits within the definitions of expansion of utility facilities and for implementing the Utility Corridor Element that states that applications for utility ROWs will be encouraged by BLM management to use designated corridors. Even though the Project lands are classified as class “L,” because the BRRTP transmission line and reconductoring are within an existing transmission corridor identified in the CDCA Plan, no plan amendment is required (CDCA Plan, p.95).

#### **3.3.1.1 Required CDCA Plan Determinations**

Because no CDCA plan amendments are necessary, no determinations are required.

#### **3.3.1.2 CDCA Plan Decision Criteria**

Because no CDCA plan amendments are necessary, no plan decision criteria are presented.

### **3.3.2 South Coast Resource Management Plan.**

The 1994 South Coast Resource Management Plan, as amended, provides a guide for management of approximately 296,000 acres of BLM-administered public land. This includes 129,000 acres of BLM-administered surface land and 167,000 acres of Federal mineral ownership where the surface is privately owned. The 129,000 acres of BLM public land are scattered over a five-county area in 296 separate parcels. Ninety-five percent of the BLM land base in the planning area is in western San Diego and western Riverside counties, with the remainder in southwestern San Bernardino, Los Angeles, and Orange counties.

The general objective of resources management planning is to provide a framework to maximize resource values and the multiple use of the BLM public lands through a rational, consistently applied set of procedures. Resource management plans are designed to guide and control future management actions as well as the development of subsequent and more detailed plans. The major effort for this Resource Management Plan is twofold. One aspect is to address opportunities for managing sensitive resources and open space values on the public lands, and to balance the protection of these resources with potential uses such as recreation and mineral development. The other is to address the potential for improving management effectiveness through adjustment of the scattered land ownership pattern.

The South Coast Planning Area has been divided into four management areas to facilitate management. Approximately 275 feet of the BRRTP new circuit to be installed on existing double-circuit towers within an existing BLM ROW will be located within this Los Angeles-Orange county management area.

Utility corridors are not identified in the South Coast Resource Management Plan because of the low percentage of BLM public land ownership within the planning area. Areas designated as ROW avoidance areas (i.e., areas closed to ROW use) are identified for each management area to provide for protection of sensitive resources. ROW proposals outside of avoidance areas are open to normal case-by-case evaluation.

The BRRTP new circuit will be located within an existing BLM ROW and will not be located within a ROW avoidance area. As such, the authorization for the new circuit will be consistent with the South Coast Resource Management Plan.

### **3.3.3 Utility Corridors**

Approximately 3.7 miles of new transmission line in the new ROW and 3.8 miles of reconductoring in an existing ROW lie within two utility corridors, the CDCA Designated Utility Corridor A and the Section 368 Utility Corridor 23-106. The purpose of the designated CDCA utility corridors is to implement a network of joint-use planning corridors to meet the projected utility needs and concentrate the effects of energy-related projects and utilities in manageable locations.

## **4. Alternatives**

Five Alternatives, including the Proposed Action, which is the Selected Alternative in this ROD, and the No Action Alternative, were analyzed in detail in the Final EIS/EIR. Fifteen other alternatives, including generation, design, and routing alternatives, were identified by the lead agencies, but were eliminated from detailed analysis in the Final EIS/EIR because they either did not meet the Project purpose and need/objectives or were determined infeasible (see Alternatives Development Report in Appendix B of the Final EIS/EIR).

In response to comments on the Draft EIS/EIR, two additional alternatives, Three-Circuit Towers Alternative and Green Valley Multi-Line Relocation Alternative, were considered but eliminated

from detailed analysis in the Final EIS/EIR. It is noted that due to the limited area of BLM-managed lands crossed by the BR RTP, all Action Alternatives would require the same grants and confirmation of Project consistency with existing ROW grants by the BLM.

## 4.1 Alternatives Fully Analyzed

The five Alternatives detailed in this section, including the Proposed Action, were fully analyzed in the Final EIS/EIR (four action Alternatives and one No Action Alternative).

### 4.1.1 No Action Alternative

Under the No Action Alternative, the construction of the new 230 kV transmission line, addition of a new circuit on existing structures from Haskell Canyon to the Castaic Power Plant, reconductoring of the existing BR-RIN 230 kV transmission line, construction of a Haskell Canyon Switching Station, and expansion of the existing Barren Ridge Switching Station would not occur. Current, ongoing operation and maintenance activities for existing transmission line and switching station facilities in the Project area would continue by utility maintenance personnel.

### 4.1.2 Action Alternatives

Each action Alternative included the construction, operation, maintenance, and decommissioning of the same five Project components, listed below, but proposed alternate routes for the proposed 230 kV double-circuit transmission line from the Barren Ridge Switching Station to the proposed Haskell Canyon Switching Station:

- 1) Expansion of the existing Barren Ridge Switching Station;
- 2) Construction of a new switching station in Haskell Canyon;
- 3) Construction of a new 230 kV double-circuit transmission line from the LADWP Barren Ridge Switching Station to the proposed Haskell Canyon Switching Station (item #2 above); length of the transmission line would vary by Alternative;
- 4) Reconductoring of 76 miles of the existing BR-RIN 230 kV transmission line with larger-capacity conductor between the Barren Ridge Switching Station and the Rinaldi Substation; and
- 5) Addition of 12 miles of new 230 kV circuit on the existing double-circuit structures from Haskell Canyon to the Castaic Power Plant.

#### 4.1.2.1 Alternative 1

The Alternative 1 230 kV double-circuit transmission line is the longest Alternative, at 83 miles long. It would run from the Barren Ridge Switching Station to the unincorporated community of Mojave, while paralleling LADWP's existing 230 kV BR-RIN and 500 kV PDCI transmission lines. It would continue south-southwest to parallel the Los Angeles Aqueduct to Lancaster Road, where it would travel west to the Interstate 5 utility corridor. It would then run southeast along LADWP's existing Castaic – Rinaldi corridor to the proposed Haskell Canyon Switching Station. This Alternative was retained for analysis because it would meet the Project purpose and need/objectives, be feasible, and have the potential to reduce or minimize environmental impacts

associated with the new 230 kV double-circuit transmission line by avoiding the unincorporated communities of Elizabeth Lake, Green Valley, Leona Valley, Agua Dulce, and Antelope Acres.

#### **4.1.2.2 Alternative 2: Proposed Action and Selected Alternative**

The new 230 kV double-circuit transmission line for Alternative 2 would be 61 miles long, and includes the shortest 230 kV transmission line of the action Alternatives. It would begin at the Barren Ridge Switching Station and run south, paralleling LADWP's existing 230 kV BR-RIN and 500 kV PDCI transmission lines. It would extend south from the unincorporated community of Mojave through the Antelope Valley and approximately one mile east of the Antelope Valley California Poppy Reserve before continuing onto NFS lands and ending at the proposed Haskell Canyon Switching Station. The entire route would remain within designated utility corridors and would parallel existing transmission lines. This Alternative would have the potential to affect portions of unincorporated Kern and Los Angeles Counties; the unincorporated communities of Mojave, Willow Springs, Antelope Acres, Elizabeth Lake, Green Valley, and Saugus; and cities of Santa Clarita and Los Angeles. This Alternative was retained for analysis because it would meet the Project purpose and need/objectives, be feasible, and have the potential to avoid or minimize environmental effects as the preferred Alternative.

#### **4.1.2.3 Alternative 2a**

The 230 kV double-circuit transmission line in Alternative 2a includes a re-route avoiding the unincorporated community of Green Valley. It would be 63 miles long and would be very similar to the Proposed Action (Alternative 2), with 56 miles of the same alignment. Alternative 2a would begin at the Barren Ridge Switching Station and run south, paralleling LADWP's existing 230 kV BR-RIN and 500 kV PDCI transmission lines. It would travel south from unincorporated community of Mojave through the Antelope Valley and approximately one mile east of the Antelope Valley California Poppy Reserve before continuing onto NFS lands and ending at the proposed Haskell Canyon Switching Station. The route would remain within designated utility corridors and would parallel existing transmission lines, with the exception of the nearly seven miles that would be routed around the unincorporated community of Green Valley. The Green Valley re-route would run outside of existing utility corridors through the ANF. The re-route would rejoin south of the unincorporated community of Green Valley before continuing south and ending at the proposed Haskell Canyon Switching Station. This Alternative was retained for analysis because it would meet the Project purpose and need/objectives, be feasible, and have the potential to avoid or minimize environmental effects by avoiding the unincorporated community of Green Valley.

#### **4.1.2.4 Alternative 3**

The proposed 230 kV double-circuit transmission line in Alternative 3 is 76 miles long and would begin at the Barren Ridge Switching Station and run south, paralleling LADWP's existing 230 kV BR-RIN and 500 kV PDCI lines. It would travel south from the unincorporated community of Mojave through the Antelope Valley and approximately one mile east of the Antelope Valley California Poppy Reserve before continuing southeast past SCE's Antelope Substation. The route would then travel toward the city of Palmdale, parallel to SCE's existing

high-voltage transmission lines. It would turn sharply south to parallel LADWP's existing Victorville – Rinaldi 500 kV and Adelanto – Rinaldi 230 kV transmission lines. This Alternative would then parallel these transmission lines west, crossing two miles of the ANF. The Alternative would then parallel LADWP's 500 kV PDCI line north to the proposed Haskell Canyon Switching Station. This Alternative was retained for analysis because it would meet the Project purpose and need/objectives, be feasible, and have the potential to avoid or minimize environmental effects by avoiding an eligible Wild and Scenic River and resulting in fewer impacts to the ANF.

## **4.2 Alternatives Not Fully Analyzed**

### **4.2.1 Generation Alternatives**

#### ***4.2.1.1 Energy Conservation and Demand-Side Management***

This alternative would involve increased energy conservation and demand-side management within the LADWP service area instead of interconnecting to generation from the Tehachapi Mountains and Mojave Desert. Energy conservation and demand-side management alone, or in combination with other listed generation alternatives, would not meet the electrical energy demands, meet Renewable Portfolio Standard (RPS) goals, or achieve greenhouse gas emission reduction goals. While it could lead to avoidance and minimization of environmental effects from the construction of a new transmission line, it is not feasible to rely solely on this strategy to meet the electrical energy demands and RPS and greenhouse gas reduction goals.

#### ***4.2.1.2 Distributed Generation and In-Basin Generation Expansion***

This alternative would involve the increased expansion of distributed generation, including solar facilities and fuel cells within the LADWP service area, and the development of additional large-scale in-basin generation instead of interconnecting to generation from the Tehachapi Mountains and Mojave Desert. LADWP has implemented a number of distributed generation and in-basin generation programs. This alternative alone, or in combination with other listed generation alternatives, would not meet the electrical energy demands, meet RPS goals, achieve greenhouse gas emission reduction, or increase overall system reliability, nor would it provide delivery of renewable energy at a level and within a timeframe necessary to meet the purpose and need/objectives.

#### ***4.2.1.3 Solar Generation***

The solar alternative would involve the increased use of solar energy. LADWP's Solar Energy Plan proposes to provide approximately 10% of LADWP's electrical demand. Although this alternative may avoid or minimize impacts of the Proposed Action, this alternative alone, or in combination with other listed generation alternatives, would not meet the electrical energy demands or RPS goals. Additional transmission capacity may also be required to transfer solar energy from the Large-Scale Solar Program in the Mojave Desert area to the Los Angeles Basin.

## 4.2.2 Design Alternatives

### 4.2.2.1 Accessing Other Renewable Areas

The Tehachapi/Owens Valley resource area and the Mojave Desert have high renewable energy generation potential. LADWP's existing BR-RIN transmission line currently accesses this renewable resource area; however, transmission capacity is limited. This alternative would consider accessing the Salton Sea/San Diego and Southeastern California resource areas. However, to integrate intermittent renewable resources and maintain a reliable electrical system, LADWP would need to access a number of renewable resource areas and this alternative does not meet the purpose and need/objective to deliver renewable energy sources from the Tehachapi Mountains and Mojave Desert areas. LADWP would also not be able to utilize existing facilities, such as the pumped storage hydroelectric Castaic Power Plant power plant, to store energy to balance when it would enter the system. The need to access other renewable resource areas would require new transmission lines; therefore, this alternative would have similar impacts to those of the Proposed Action.

### 4.2.2.2 Direct Current Transmission

This alternative would utilize direct current (DC) for power transmission rather than alternating current (AC). DC conductors can transfer approximately twice the power of the proposed AC conductors and may also allow power transmission between unsynchronized AC distribution systems; this increases system stability by preventing cascading failures from propagating within a wider power transmission grid. To fully incorporate a new DC line into the existing AC system, conversion facilities would have to be built at the terminal ends (the Barren Ridge Switching Station and the proposed Haskell Canyon Switching Station).

While the DC system would meet LADWP's purpose and need/objectives, this alternative would require converter stations and the removal of the existing BR-RIN—compromising all small hydroelectric generation plants—and it may increase the potential for impacts to numerous resources. The DC system would also limit future interconnections into the larger LADWP network and the amount of renewable energy available for LADWP in meeting RPS goals.

### 4.2.2.3 Quad-Circuit Towers

LADWP considered the use of quad-circuit towers along the existing BR-RIN corridor instead of the proposed double-circuit tower and existing single-circuit BR-RIN towers. The towers would be constructed adjacent to the existing transmission towers within new ROW and would require a 50-foot by 40-foot tower footprint, and would be approximately 120 feet in height, with tower to-tower spans of 1,000 feet (which is very similar to that of the proposed double-circuit towers). The reductored BR-RIN circuit and two new proposed circuits would be combined onto the same quad-circuit towers, and the existing BR-RIN towers would be removed; however, quad-circuit towers were examined and determined to be not feasible in the unincorporated community of Green Valley, due to ROW constraints.

This alternative would require less permanent rights-of-way and minimize permanent impacts to land use and visual resources and to USFS- and BLM-managed lands. The quad-circuit

structures would not meet LADWP's purpose and need/objective to increase overall system reliability.

#### **4.2.2.4 Alternative Voltages**

The voltage of a transmission line determines how much electricity the line can transmit, with higher voltage lines transmitting more electricity. In general, as the voltage increases, the height of the supporting towers, footprint of the towers, size of the insulators, distance between conductors on towers, and ROW widths also increase. The utilization of a single-circuit 500 kV transmission line would require the conversion of the switching stations to substations, would have the potential to increase environmental impacts, and would deliver a capacity well beyond the needs of LADWP, and is therefore not considered. Lower-voltage lines would have similar issues.

The use of an alternative single-circuit 500 kV transmission line would meet the purpose and need/objective of the Project to transfer renewable energy, but would have the potential to increase environmental impacts.

#### **4.2.2.5 Underground Transmission**

This alternative would install the transmission line underground in lieu of overhead transmission. Underground construction is more difficult and results in greater clearing, grading, and land disturbance than overhead transmission line construction. An underground high-voltage transmission line would meet the purpose and need/objectives of the Project; however, it would have greater impacts to resources, would be considered less reliable, increase repair times, and would also not be cost-effective for long distances.

#### **4.2.2.6 New Conductor Technology**

Superconductors are still in the developmental stage and the technology is currently considered infeasible for longer distances. Theoretically, use of superconductor technology could replace the proposed 230 kV and existing BR-RIN transmission lines with a single circuit on a new tower between the Barren Ridge and Haskell Canyon Switching Stations and the existing BR-RIN transmission towers could be removed, similar to the single-circuit 500 kV transmission line alternative. However, because superconductors require above-ground ancillary facilities on or adjacent to the ROW, they would result in greater ground disturbance and longer construction duration than with standard transmission lines. Superconductors would create a greater potential for impacts to transportation, traffic, soils, and socioeconomics, and archaeological, cultural, biological, and water resources.

#### **4.2.2.7 Only Reconductor Existing Transmission Line (No New Transmission Line)**

Reconductoring of the existing BR-RIN transmission line would take approximately one year and would require the transmission line to be taken out of service for much of that time. Because bypassing the power plants or halting their electrical output are not possible, a temporary transmission line would be necessary.

Without a new double-circuit 230 kV transmission line, the transfer capacity of the utility corridor from Barren Ridge to the proposed Haskell Canyon Switching Station would remain constrained; thus, LADWP would not meet their purpose and need.

#### **4.2.2.8 Only New 230 kV Transmission Line (No Reconductoring of BR-RIN)**

This alternative would include construction of a new 230 kV double-circuit transmission line from the Barren Ridge Switching Station to the proposed Haskell Canyon Switching Station, addition of a new 230 kV circuit on existing structures from the Castaic Power Plant to the proposed Haskell Canyon Switching Station, construction of the Haskell Canyon Switching Station, and expansion of the Barren Ridge Switching Station.

Removing the reconductoring portion of the Proposed Action would minimize the potential for impacts to environmental resources and reduce cumulative impacts of the Proposed Action. However, it would limit LADWP's ability to transfer renewable energy, meet future electrical energy demands, meet RPS goals, and reduce greenhouse gas emissions.

### **4.2.3 Routing Alternatives**

#### **4.2.3.1 Midway to Vincent Corridor**

The Midway to Vincent Corridor is approximately 15.4 miles long and traverses the ANF from the designated Interstate 5 Utility Corridor. The Midway to Vincent Corridor is also a designated USFS utility corridor that contains two existing SCE 500 kV transmission lines (Midway – Vincent #1 and #2). During the siting study, it was identified as a potential routing segment for the siting of a new 230 kV transmission line. It was eliminated from further study because the alignment of the corridor traversed west to east across the ANF, and the purpose of the Proposed Action was to transfer energy from the north (Barren Ridge Switching Station) to the south (Haskell Canyon). The greater length of this routing segment has the potential to pose reliability issues, and additional footprint across the ANF would increase potential impacts to environmental resources.

The Midway to Vincent Corridor would meet the purpose and need/objectives for the Project, but it would not significantly reduce or avoid impacts to land use, cultural, biological, and visual resources, or avoid geological hazards. The Midway to Vincent Corridor is much longer than the Proposed Action, and thus could potentially lead to more geographically extensive impacts. The increased length, steep topography, and limited existing access roads for construction could make the Midway to Vincent Corridor more difficult and costly to build in comparison to the Proposed Action.

#### **4.2.3.2 Bouquet Canyon Alternative**

The Bouquet Canyon Alternative is a routing segment for the siting of a new 230 kV transmission line from the Antelope Valley to the proposed Haskell Canyon Switching Station. A majority of the Bouquet Canyon Alternative would be on ANF lands and would mostly parallel the newly constructed SCE Antelope – Pardee transmission line and the last 1.5 miles would follow the SCE 66 kV Saugus – Del Sur transmission line that was removed. Unlike the other identified routing

segments for the siting of a new transmission line, very limited access occurs along the Bouquet Canyon Alternative on the ANF.

The Bouquet Canyon Alternative would meet the agency's purpose and need and objectives for the Project. Ground disturbance and visual impacts would be minimized through the use of helicopter construction; however, impacts to air quality and noise would increase. Helicopter construction also poses construction and safety concerns that are not present for the Proposed Action. Cumulative effects for the Project would also increase because of the further disturbance of revegetated and rehabilitated areas and potential for impacts from three transmission line projects (Antelope – Pardee, Tehachapi Renewable Transmission Project, and BRRTP) in the same vicinity.

#### **4.2.3.3 Antelope Valley Alternative**

The Antelope Valley Alternative would be 33 miles long and would start just north of the unincorporated community of Mojave, parallel the Los Angeles Aqueduct southwest to Cottonwood Creek, then turn southeast and parallel three existing SCE high-voltage transmission lines to the Antelope Valley California Poppy Reserve. It was determined that the Antelope Valley Alternative would meet the purpose and need/objectives for the Project. It would avoid impacts to residences close to the Proposed Action, but would create a new transmission corridor and increase the potential for impacts to visual resources, biological resources, water resources, air quality, and cultural resources. This alternative would also require more new access roads and improvements to existing access roads.

#### **4.2.3.4 Elizabeth Lake Tunnel**

The unincorporated community of Green Valley recommended placing an underground transmission line within the Elizabeth Lake Tunnel (also known as the Los Angeles Aqueduct) as an alternative route to the Proposed Action for the construction of the new 230 kV transmission line. As the aqueduct was constructed for and is used for water conveyance, it is not a viable option for the housing of underground transmission lines. The aqueduct is a well-maintained facility, and LADWP does not have plans to replace it. Installing high-voltage transmission within an active aqueduct tunnel is neither feasible nor safe.

#### **4.2.3.5 Haskell Canyon Switching Station Site B**

As a component of the BRRTP, LADWP proposed the construction of a new switching station in Haskell Canyon, south of the ANF, on LADWP-owned property at the convergence of several existing and proposed 230 kV transmission lines. The proposed site is referred to as Site A. Site B was identified as a possible alternative switching station site, and is north of the city of Santa Clarita, approximately one mile south of Site A. Due to the fact that LADWP would have to acquire additional property to build Site B, and other issues such as greater impacts to visual resources and land use and high potential for landslide and liquefaction within the area, it was determined that it would not be feasible to construct the switching station at that site.

## **4.2.4 New Alternatives Considered in Response to Comments on the Draft EIS/EIR**

### **4.2.4.1 Three-Circuit Towers**

In response to a comment received on the Draft EIS/EIR, LADWP considered the use of three-circuit towers along the existing BR-RIN corridor instead of the proposed double-circuit tower and existing single-circuit BR-RIN towers. Utilizing three-circuit structures exclusively would not meet the purpose and need/objective to increase LADWP's system reliability and flexibility, increase delivery of renewable energy, or meet future electrical demands. Greater temporary impacts would result from constructing the large three-circuit towers and removing the existing BR-RIN. Because this alternative would not meet the basic Project purpose and need, it is eliminated from further evaluation in the Final EIS/EIR.

### **4.2.4.2 Green Valley Multi-Line Relocation Alternative**

In response to comments received from residents of the unincorporated community of Green Valley on the Draft EIS/EIR, the lead agencies investigated a variety of new alignments in the Green Valley area to relocate both the existing and proposed transmission lines around this community; from this, the Green Valley Multi-Line Relocation Alternative was developed and reviewed. The Green Valley Multi-Line Relocation Alternative would meet the BLM's basic purpose and need. However, due to the need to increase the ROW required within the ANF and deviating from designated corridors, this alternative would lessen the ability to meet the USFS' purpose of minimizing effects of utility corridors on Federally managed lands, in addition it does not avoid or minimize overall environmental effects, in comparison to the Proposed Action.

## **4.3 Agency Preferred Alternative**

The BLM's and USFS' preferred Alternative for the BRRTP is the Selected Alternative, referred to as the Proposed Action and Alternative 2 in the Final EIS/EIR. It is noted that due to the limited area of BLM-managed lands crossed by the BRRTP, all Action Alternatives would require the same grants and confirmation of Project consistency with existing ROW grants by the BLM.

## **4.4 Environmentally Preferable Action Alternative**

As described in Chapter 2 of the Final EIS/EIR, Section 2.7, the Selected Alternative has the least overall environmental impacts of the Action Alternatives and was identified as the environmentally preferable Action Alternative.

# **5. Public Involvement**

## **5.1 Scoping**

As a preliminary step in the environmental planning process, LADWP conducted pre-application meetings with the BLM and USFS in September 2006. On February 12, 2007, LADWP officially submitted a ROW application to the BLM and a Special Use Authorization Application to the

USFS for the Proposed Action. Later that same year on October 30, November 6, and November 10, LADWP, acting as the Project proponent, hosted a series of three informational public meetings in the communities of Mojave, Agua Dulce and Lake Elizabeth to share information about the Project and explain the forthcoming environmental review process and opportunities for public input. In March of 2008, prior to the initiation of the formal scoping process, LADWP changed the title of the Proposed Action to its current name, the Barren Ridge Renewable Transmission Project.

The USFS and BLM published a Notice of Intent (NOI) to prepare a joint EIS/EIR for the BRRTP in the Federal Register (Volume 73, Number 67) on April 7, 2008. The NOI initiated the public scoping period from April 7, 2008 through May 7, 2008 (31-day period). An NOP was filed with the California State Clearinghouse on April 7, 2008 (SCH #2008041038), for which the review period ended May 7, 2008.

USFS, BLM, and LADWP conducted seven public scoping meetings from April 22 to May 1, 2008 in Santa Clarita, Agua Dulce, Castaic, Lake Hughes, Lebec, Palmdale, and California City. A total of approximately 122 people attended those meetings.

Public outreach during scoping included the Project website (<http://www.ladwp.com/barrenridge>), Project email (BRRTP@powereng.com), toll-free Project Hotline [(877) 440-3592], and numerous press releases.

A total of 231 comments were received during the scoping period; comments were received at the scoping meetings, and via phone, e-mail, and mail. These comments were addressed in the Final EIS/EIR, and were considered in the formulation of alternatives. Five general categories of comments were received:

- Project Need and Objectives
- Alternatives
- Human Environment Issues
  - Air Quality
  - Cultural Resources
  - EMF
  - Fire Safety
  - Land Use/Recreation and Wilderness
  - Noise
  - Property Values
  - Public Health and Safety
  - Public Services and Utilities
  - Traffic
  - Visual Resources

- Natural Environment Issues
  - Biological Resources
  - Earth Resources
  - Hydrology and Water Quality
- Cumulative Impacts

Between February 17 and February 26, 2009, LADWP conducted five informational public meetings to update the public on scoping results, study results, and the evaluation of alternative transmission line routes. A total of approximately 117 people attended those meetings. Meeting locations were advertised in a newsletter distributed in February 2008.

A total of 159 comments were received between July 2008 and March 2009; comments were received at the informational public meetings, and via phone, e-mail, and mail. These comments were addressed in the Draft EIS/EIR, and were considered in the formulation of alternatives. Four general categories of comments were received:

- Alternatives
- Human Environment Issues
  - Cultural Resources
  - Fire Safety
  - Land Use/Recreation and Wilderness
  - Property Values
  - Public Services, Health and Safety
  - Socioeconomics
  - Traffic
  - Visual Resources
- Natural Environment Issues
  - Biological Resources
  - Hydrology and Water Quality
- Cumulative Impacts

## **5.2 Draft EIS/EIR Public Comment Period**

The NOA of the Draft EIS/EIR was published on August 26, 2011 in the Federal Register. The Draft EIS/EIR was circulated for public and agency review and comment for a 60-day period following the publication of the NOA of the Draft EIS/EIR by the EPA and filing of the Notice of Completion (NOC) with the California State Clearinghouse.

During the review period, five public meetings were held between September 20 and September 29, 2011 in Mojave, Lake Hughes, Leona Valley, Agua Dulce, and Santa Clarita to receive public input on the Draft EIS/EIR. Comments received are addressed in the Final EIS/EIR in Appendix

R. A total of approximately 74 people attended those meetings. Meeting locations were advertised in a newsletter distributed in August 2011.

A total of 122 substantive comments were received during the public period between August 26, 2011 and October 25, 2011. Comments were received at the informational public meetings, and via phone, e-mail, and mail. These comments were addressed in the Draft EIS/EIR, and were considered in the formulation of alternatives. Four general categories of comments were received:

- Project Need and Objectives
- Alternatives
- Human Environment Issues
  - Air Quality
  - Cultural Resources
  - EMF
  - Fire Safety
  - Land Use/Recreation
  - Noise
  - Property Values
  - Public Health and Safety
  - Public Services and Utilities
  - Socioeconomic and Environmental Justice
  - Traffic
  - Visual Resources
- Natural Environment Issues
  - Biological Resources
  - Earth Resources
  - Hydrology and Water Quality
- Cumulative Impacts

All public comments on the Draft EIS/EIR were considered and addressed in the Final EIS/EIR. Responses to comments are provided in Appendix R of the Final EIS/EIR.

## 6. Final Agency Action

### 6.1 Right-of-Way Authorizations

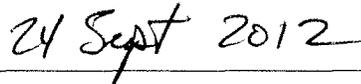
It is my decision to approve a transmission right-of-way lease/grant to LADWP and to confirm Project consistency with existing ROW grants, subject to the terms, conditions, stipulations, plan of development, and environmental protection measures developed by the BLM and reflected in this ROD. This decision is effective on the date this ROD is signed.

Approved by:



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Robert Pawelek  
Ridgecrest Field Office Manager  
Bureau of Land Management



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Date

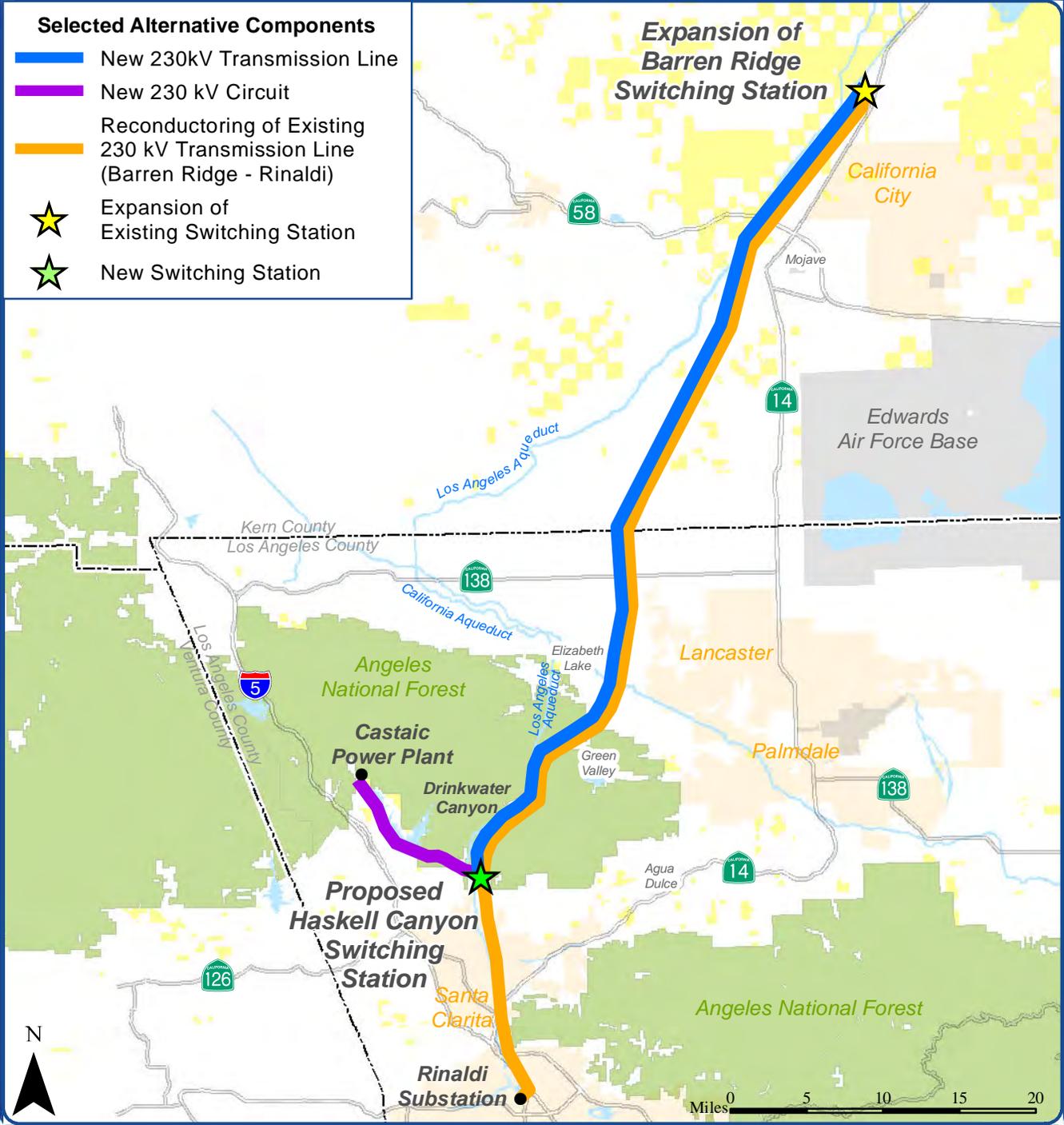
## ROD Figures



# Selected Alternative Components

## Selected Alternative Components

-  New 230kV Transmission Line
-  New 230 kV Circuit
-  Reconductoring of Existing 230 kV Transmission Line (Barren Ridge - Rinaldi)
-  Expansion of Existing Switching Station
-  New Switching Station



# BLM-Managed Lands

## Selected Alternative Components

-  New 230kV Transmission Line
-  New 230 kV Circuit
-  Reconductoring of Existing 230 kV Transmission Line (Barren Ridge - Rinaldi)
-  Expansion of Existing Switching Station
-  New Switching Station

