IVANPAH-CONTROL PROJECT

Scoping Report

Prepared for: California Public Utilities Commission 505 Van Ness Avenue San Francisco CA 94102



Prepared by:



December 2020

Contents

1.	Intro 1.1 1.2	duction1Purpose of Scoping1Scoping Report Organization1
2.	Prop 2.1 2.2	osed Project2Project Purpose2Project Description2Segment 1: Control Substation (Bishop) to Inyokern2Segment 2: Inyokern–Kramer Junction2Segment 3N: Kramer Junction–Coolwater Substation (East of Barstow)2Segment 3S: Kramer Junction–Tortilla Substation (Barstow)–Coolwater Substation3Segment 4: Coolwater Substation (East of Barstow) to Ivanpah Substation3
3.	Proje 3.1 3.2 3.3 3.4 3.5	Scoping3Notice of Preparation4Newspaper Advertisements4Public Scoping Meetings (Virtual)4Other Public Outreach5Agency and Tribal Government Outreach5
4.	Scop	ing Comments6Project Description6Aesthetics7Agriculture7Air Quality7Biological Resources7Cumulative Impacts/Projects9Cultural and Tribal Cultural Resources9Hydrology and Water Quality10Land Use and Recreation10Public Services, Utilities, and Service Systems11Transportation and Traffic11Alternatives11

Tables

Table 1. Newspaper Advertisements	. 4
Table 2. Public Scoping Meetings	. 4

Figures

Figure 1.	Project Segments and	Location	3
-----------	----------------------	----------	---

Appendices

Appendix A	EIR Notices
Appendix B	Scoping Meeting Comments
Appendix C	Scoping Comment Letters

1. Introduction

This scoping report documents the public outreach effort conducted by the California Public Utilities Commission (CPUC) for the Ivanpah-Control Project (I-C Project or proposed project). Southern California Edison (SCE), the project applicant, has filed an application with the CPUC for a Permit to Construct (A.19-07-015) for approval to construct the project. As part of the project review process and in compliance with the California Environmental Quality Act (CEQA), the CPUC will prepare an Environmental Impact Report (EIR) that will evaluate the potential environmental impacts of the project.

In compliance with CEQA, the CPUC held a 30-day public scoping period to allow the members of the public, regulatory agencies, and interested parties an opportunity to comment on the scope of the EIR and to identify issues that should be addressed in the environmental document. This report documents the issues and concerns expressed during two virtual public meetings¹ held in September 2020 and the written comments received from the public, organizations, and agencies during the public scoping period.

Because the proposed transmission line would cross federal land administered by the Bureau of Land Management (BLM), the BLM will prepare a separate Environmental Impact Statement under the National Environmental Policy Act (NEPA) and conduct a separate scoping process.

1.1 Purpose of Scoping

The process of requesting public and agency input on the focus and content of the EIR is known as scoping. Scoping helps to identify the range of actions, alternatives, environmental effects, and mitigation measures to be analyzed in depth, and eliminates from detailed study those issues that are not pertinent to the final decision on the proposed project. Scoping is an effective way to identify the concerns of the public, affected agencies, and other interested parties. Members of the public, relevant federal, State, regional and local agencies, tribal governments, interest groups, community organizations, and other interested parties by providing comments or recommendations regarding issues to be investigated in the EIR.

Comments received during the scoping process are part of the public record as documented in this scoping report. The comments and questions received during the public scoping process have been reviewed and considered by the CPUC and will be used in determining the appropriate scope of issues to be addressed in the EIR and in the selection of alternatives to be carried forward for further analysis. The objectives of the scoping process were to:

- Inform the public and relevant public agencies about the project, CEQA requirements, the project schedule, and the environmental impact analysis process,
- Solicit input on the I-C Project for consideration in the EIR, and
- Update contact information for public agencies and individuals interested in future project meetings and notices.

1.2 Scoping Report Organization

This scoping report includes four sections and appendices, as described below:

Section 1 provides an introduction to the report, describes the purpose of scoping, and presents the organization of the report.

¹ Because of the COVID-19 worldwide pandemic, no in-person meetings could be held.

- **Section 2** presents SCE's project purpose and provides information on the proposed project.
- **Section 3** provides information on the virtual scoping meetings and outreach efforts.
- **Section 4** summarizes the comments received and issues raised during the scoping period.
- Appendices contain supporting materials used during scoping (such as the Notice of Preparation, meeting presentation, newspaper advertisements), oral meeting comments, and written comment letters.

2. Proposed Project

This section summarizes SCE's project purpose and presents a brief description of the proposed project. Additional information on the project is provided on the CPUC's project website: <u>https://www.cpuc.ca.gov/Environment/info/aspen/ivanpah-control/ivanpah-control.htm</u>.

2.1 Project Purpose

SCE has stated that the purpose of the proposed project is to ensure compliance with CPUC General Order GO 95 (Rules For Overhead Electric Line Construction) and to correct problems identified through SCE's "Transmission Line Rating Remediation (TLRR)" Program.

SCE states that the I-C Project will focus on meeting the following objectives:

- Ensure compliance with CPUC General Order 95 and NERC Facility Ratings for this project by 2025
- Continue to provide safe and reliable electrical service
- Meet proposed project needs while minimizing environmental impacts
- Design and construct the physical components of the proposed project in conformance with industry and/or SCEs approved engineering, design, and construction standards for substation and subtransmission system projects.

2.2 Project Description

SCE is proposing to rebuild components of its existing 115 kilovolt (kV) transmission lines that extend over 358 miles between the existing SCE Control and Haiwee Substations in Inyo County, the Inyokern Substation in Kern County, and the Kramer, Tortilla, Coolwater, and Ivanpah Substations in San Bernardino County. The proposed project is located on private land, Department of Defense land, and on federal lands administered by the BLM.

Figure 1 illustrates the location of the proposed project and its five segments. The five segments of the proposed project are described below.

Segment 1: Control Substation (Bishop) to Inyokern

Segment 1 is 126 miles long, and includes removal of approximately 1,161 structures, and installation of approximately 905 structures.

Segment 2: Inyokern–Kramer Junction

This 48-mile segment includes removal of approximately 390 structures and installing approximately 342 structures. SCE would also install and then remove 110 temporary structures.

Segment 3N: Kramer Junction–Coolwater Substation (East of Barstow)

Segment 3N is 44 miles long, and includes removal of approximately 43 existing structures, and installation of approximately 45 new structures.

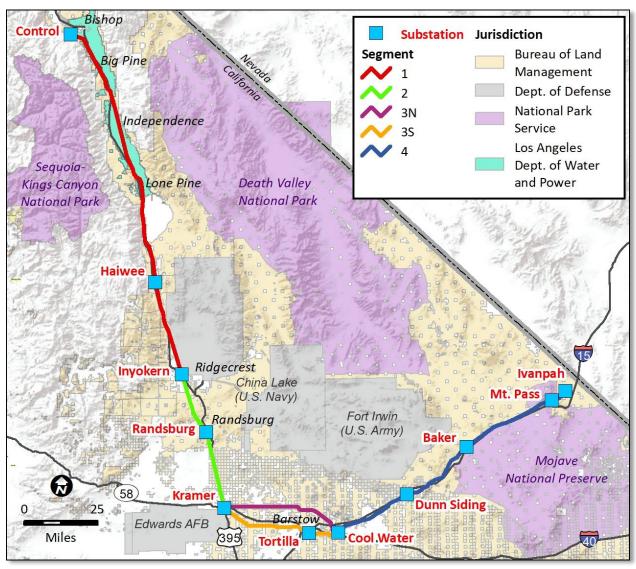


Figure 1. Project Segments and Location

Segment 3S: Kramer Junction–Tortilla Substation (Barstow)–Coolwater Substation

Segment 3S is 44 miles long, and includes removal of approximately 42 structures, and installation of approximately 42 new structures.

Segment 4: Coolwater Substation (East of Barstow) to Ivanpah Substation

Segment 4 is 96 miles long, and includes removal of approximately 60 existing structures, and installation of 62 new structures. SCE also proposes to modify approximately 83 structures.

3. Project Scoping

This section describes the methods used to notify the public and agencies about the scoping process conducted for the I-C Project. It outlines how information was made available for public and agency review and identifies the different avenues that were made available for providing comments on the project (meetings, email, and mail) during the public scoping process. The 30-day scoping period began on September 1, 2020 and ended on September 30, 2020.

3.1 Notice of Preparation

On September 1, 2020, the CPUC issued a Notice of Preparation (NOP) consistent with CEQA Guidelines Section 15082. The NOP described the proposed project, stated the CPUC's intention to prepare an EIR, and requested comments from interested parties. In addition to mailing the NOP to agencies and Native American tribes, a postcard notice was mailed to landowners along the project route.

NOPs and scoping notices were mailed to responsible, trustee, and interested agencies, tribal governments, and property owners/residents as noted below.

- 136 NOPs were distributed via U.S. Mail.
- 146 NOPs were distributed via email.
- 1,133 postcard notices were distributed by U.S. Mail.

The NOP was also filed at the State Clearinghouse and posted at the County Clerks' offices for the counties of Inyo, Kern, and San Bernardino.

3.2 Newspaper Advertisements

The public scoping period for the EIR was advertised in three newspapers, as shown in Table 1. Advertisements provided a synopsis of the proposed project, a map of the project route, information about the scoping period and the scoping meetings, the address for submitting written comments on the project, and the address for the project website. Appendix A includes copies of the advertisements published in the three newspapers.

Table 1. Newspaper Advertisements						
Publication	Language	Date				
Desert Dispatch	English	Tuesday, August 25, 2020				
Inyo Register	English	Thursday, August 27, 2020				
Daily Independent	English	Friday, August 28, 2020				

3.3 Public Scoping Meetings (Virtual)

The CPUC held two virtual public scoping meetings using the Zoom Meetings software, where attendees could access either meeting through an internet connection or a phone call (see Table 2). The purpose of the scoping meetings was to present information about the I-C Project and the CPUC's decision making processes, and to listen to public comments. All oral comments made at the scoping meetings were recorded and are included in the summary of comments in Section 4 of this report. Appendix B includes the complete comments presented at these meetings, which were transcribed from the meeting recordings.

	Virtual Meeting #1	Virtual Meeting #2
Day & Date	Thursday, September 3, 2020	Thursday, September 10, 2020
Time	Afternoon: 2:00 to 3:30 p.m.	Evening: 6:30 to 8:00 p.m.
How to Participate	Via Zoom Meeting: https://us02web.zoom.us/j/86439196759 or by Phone: (669) 900-6833 then enter Webinar ID: 864 3919 6759	Via Zoom Meeting: <u>https://us02web.zoom.us/j/86867547120</u> or by Phone: (669) 900-6833 then enter Webinar ID: 868 6754 7120

3.4 Other Public Outreach

In addition to the public scoping meetings, the CPUC provided additional opportunities for the public and agencies to ask questions or comment on the project. A project information phone line, email address, and website were established. Information on these outreach options are described below.

- Other Avenues for Submitting Comments. The CPUC provided an email address (<u>Ivanpah-Control@</u> <u>aspeneg.com</u>) for electronic submittal of comments and CPUC staff contact information for submittal of comments by U.S. Mail.
- Project Website. The CPUC established a project-specific website to house all project-related documents during the CEQA process. During the scoping period, the website presented details on the scoping meetings, and described how comments could be submitted. This website will be updated throughout the review of the I-C Project to serve as a resource of project reports and updates.

https://www.cpuc.ca.gov/Environment/info/aspen/ivanpah-control/ivanpah-control.htm

- Phone Line. A project phone line was set up to take questions from the public or requests for more information. This phone line (800-535-2572) provided another avenue for the public to obtain information about the project. This phone line will continue to be used throughout the project review process.
- Project Contact List. The CPUC has compiled a project-specific mailing list with approximately 1,500 entries. This list includes responsible, trustee, and interested agencies, State Clearinghouse, tribal governments, and property owners/residents.

The mailing list was updated based on contact information from the comment letters received during the scoping comment period. This mailing or distribution list will continue to be used throughout the environmental review process to distribute public notices and will be updated regularly to ensure all interested parties are notified of key project milestones.

3.5 Agency and Tribal Government Outreach

From late 2018 through 2019, the CPUC contacted federal, state, and local agencies during the period of time before SCE submitted the final Application for Permit to Construct to seek early input on the project. More than 25 agencies were contacted during this early outreach to identify issues of concern and to provide information on the project. These agencies were also notified at the start of scoping and will continue to be noticed regarding project activities. Some of the agencies listed below have provided scoping comments regarding this project (see Section 4).

- U.S. Bureau of Land Management
- National Park Service
- Military Working Group
- U.S. Fish and Wildlife Service
- U.S. Forest Service
- Federal Aviation Administration
- CA State Lands Commission
- CA Fish and Wildlife

- Caltrans
- CA Regional Water Quality Control Board
- State Historic Preservation Office
- Native American Heritage Commission
- Los Angeles Department of Water and Power
- Barstow-Daggett Airport
- Air Pollution Control Districts
- Cities and Counties

The CPUC has also notified tribal government representatives regarding the start of scoping for the I-C Project. More than 40 tribal representatives received notice of the start of scoping for this project; the NOP was distributed to tribal representatives through U.S. Mail or via email depending on the available

contact information. The CPUC will continue to coordinate with tribal governments and tribal representatives consistent with CEQA requirements.

4. Scoping Comments

A total of 16 written comment letters were submitted by mail or by email during the scoping period. Appendix B to this report presents the oral comments received during the scoping meetings and Appendix C includes copies of all comment letters in their original format. The information below provides a summary of the key comments.

Project Description

- Require that the replacement transmission line does not deviate from the current transmission line corridor to ensure safety of Navy pilots and aircraft. (NAWS)²
- Concern that maintaining the current 115 KV carrying capacity will not have sufficient capacity to carry power for future planned solar and wind generation facilities. Why is SCE going through all the effort to simply replace the existing 115 KV lines? (Borders)
- If an increase in electrical conveyance capacity is incorporated in the upgrades, it must meet the requirements in the County's General Plan. (County of Inyo)
- Request a list of all Material Yards proposed to be located on land within the City of Los Angeles. If temporary construction easements are required, a proposal must be submitted to LADWP. (LADWP)
- Identify a new right-of-way alignment where it crosses LADWP property and present to LADWP for evaluation and discussion at the earliest possible stage. (LADWP)
- Request identification of future iterations of the BLM Plan of Development where the project proposes to cross LADWP transmission and distribution lines and the Los Angeles Aqueduct rights-ofway on federal land. Consent agreements at such crossings should be a condition and component of any new rights-of-way granted by BLM or federal agencies. (LADWP)
- Request a more detailed schedule for Segment 1 of the project. (LADWP)
- Request 45 days advance notice of project work in a locality and general drawings of work to be performed so that LADWP can assess potential impacts to its facilities and operations (in reference to Segment 1 of the project). (LADWP)
- Request drawings of proposed structures that cross the Los Angeles Aqueduct or its tributaries, especially those requiring mats, bridges, or other protective measures (in reference to Segment 1 of the project). (LADWP)
- Reserve the right to comment until detailed information is provided regarding the proposed project, as it affects LADWP's transmission lines. Request detailed information including dimensioned plans of all existing and proposed improvements, property lines, clearances of all improvements from LADWP and Pacific Direct Current Intertie towers, including grading, roadway, and utility plans illustrating impacts to the LADWP/PDCI Transmission Line right-of-way (TLRW). Request clearly defined LADWP TLRW in the project's proposed improvements. (LADWP)

² The following acronyms/abbreviations for commenters are used herein: Band = Rincon Band of Luiseño Indians; Borders = Jeff Borders; Caltrans = California Department of Transportation; CDFW = California Department of Fish and Wildlife; Council = Desert Tortoise Council; CRIT = Colorado River Indian Tribes; DPW = San Bernardino County Department of Public Works; Fort = Fort Independence Indian Reservation; LADWP = Los Angeles Department of Water and Power; Meadowbrook = Meadowbrook Dairy; NAHC = Native American Heritage Association; NAWS = Naval Air Weapons Station China Lake; NPS = National Park Service Manzanar National Historic Site; and USFWS = U.S. Fish and Wildlife Service.

Request electronic PLS CADD files for the LADWP's Transmission Engineering's review to determine adherence to CPUC General Order No. 95 clearance requirements. (LADWP)

Aesthetics

- Request use of paint or other methods to minimize the visual impacts from the power poles especially in areas with iconic views. (County of Inyo)
- In Inyo County, a small portion of the line falls within a designated U.S. 395 Scenic Highway section near Aberdeen. (Caltrans District 9)
- Concern with the impact of increased height of poles and change in structure on the existing viewshed of the Sierra Nevada and Inyo Mountains. NPS recommends measures to reduce/avoid adverse impacts to the visual environment. (NPS)

Agriculture

- Identify locations of proposed towers and whether they will be within Meadowbrook Dairy's property. Require discussion of temporary or permanent impacts on agriculture. (Meadowbrook)
- Identify, discuss, and mitigate for loss of agricultural land and crop production if towers and/or transmission lines will be within an agricultural field. (Meadowbrook)

Air Quality

- Concern with health impacts relating to fugitive dust. Recommend an air quality monitoring plan and adaptive management plan. (NPS)
- Concern with fugitive dust negatively impacting U.S. Navy and crop production. (Meadowbrook)
- Concern with construction impacts to overall air quality. (scoping meeting comment)

Biological Resources

- Require flagging and avoiding rare plants along the construction route where possible. Request coordination with BLM to view shapefile provided by LADWP to BLM for the location of these rare plants. (LADWP)
- Include a habitat type assessment within the project footprint and a map identifying the location of each habitat type. Adjoining habitats should also be included in the assessment where site activities could directly or indirectly impact these areas. (CDFW)
- Include a general biological inventory of species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. (CDFW)
- Include a complete, recent inventory of rare, threatened, endangered, and other sensitive species including California Species of Special Concern and California Fully Protected Species located within the project footprint and within offsite areas that could be affected. (CDFW)
- Discuss direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the project. (CDFW)
- Require mitigation measures and alternatives that would adequately avoid or minimize potential impacts to the extent feasible. (CDFW)
- Recommend that a California Endangered Species Act (CESA) Incidental Take Permit be obtained if the project has the potential to result in take of State-listed CESA species. (CDFW)

- Require notification to CDFW per Fish and Game Code section 1602. (CDFW)
- Select degraded habitats for pad sites to minimize impacts to tortoises and other rare desert plants and animals. (Council)
- Require estimates of temporary and permanent impact acreages to desert tortoise habitats to be documented in the EIR. (Council)
- Recommend completion of the USFWS protocol surveys for desert tortoises to inform ideal placement of structures involving ground disturbance to avoid tortoises and tortoise habitat. (Council)
- Recommend protocol trapping surveys for Mohave ground squirrels in all areas with proposed ground disturbance where Mohave ground squirrels may be present. (Council)
- Recommend installation of fiber optic cables within existing or immediately adjacent to roads to minimize impacts to habitat (if new fiber optic cables are not replacing existing cables). Recommend biologist(s) to perform measurements of tortoise and Mohave ground squirrel habitat before and after the project to determine temporary and permanent habitat loss (if new fiber optic cables are replacing existing cables). (Council)
- Request acreages associated with Staging Yards and Work Areas are calculated and reported in the EIR. Request that all Staging Yards occur in areas of existing disturbances. (Council)
- Recommend that the EIR identify measures that will require before and after measurements of the widths of roads that are to be improved to determine how many acres of suitable habitat are lost. Request that "Tree removal would be minimized" and a similar requirement be identified in the EIR that will apply to loss of all intact habitats and should be minimized. (Council)
- Request that the EIR include a summary of efforts by SCE to curtail subsidizing common raven nesting and perching on its structures. (Council)
- Is SCE contributing to the National Fish and Wildlife Foundation's Raven Management Fund for regional and cumulative impacts? Is there an existing raven management plan or a new one to be drafted for this project that meets USFWS standards? For those poles that are being replaced, will new poles have design features that minimize raven nesting potential? (Council)
- Recommend that cumulative impacts analysis in the EIR follow the Council on Environmental Quality guidance on how to analyze cumulative environmental consequences. (Council)
- Request that CPUC indicate existing mitigation measures that have been modified for this project and document their effectiveness for similar projects. (Council)
- Recommend a review of recent stipulations for right-of-way grants issued by the BLM and terms and conditions in biological opinions issued by the USFWS to ensure that the latest protective measures are implemented. (Council)
- Request that the EIR document existing state and federal incidental take permits that will authorize foreseeable harm or mortality of listed species, including desert tortoise and Mohave ground squirrel. (Council)
- Recommend rehabilitating habitats damaged by Staging Yards and Work Areas by following the restoration guidelines provided by the Council (Abella and Berry 2016). (Council)

Cumulative Impacts/Projects

 In Inyo County, the Olancha-Cartago U.S. 395 4-lane project is in the vicinity of the I-C Project. Coordination between Southern California Edison and Caltrans District 9 staff will ensure that pole relocations/replacements will be consistent with the I-C Project. (Caltrans District 9)

Cultural and Tribal Cultural Resources

- Concern with impacts relating to placement of contractor material yard at the Manzanar Airfield (National Historic Site and National Historic Landmark). Recommend eliminating or relocating the material storage area to a different area. (NPS)
- Concern with potentially adverse impacts to prehistoric and historic resources adjacent to the transmission line. Recommend avoidance measures or off-site mitigation. (NPS)
- Require notification if any archaeological sites are found on Navy-managed lands. (NAWS)
- Must provide Notice of Completion of an application/decision to undertake the project to a tribal representative of California Native American tribes that have requested notice. (NAHC)
- Must begin consultation process within 30 days of receiving a request for consultation from a California Native American tribe. (NAHC)
- Require discussion of mandatory topics of consultation if requested by a tribe. (NAHC)
- Recommend discussion of discretionary topics of consultation. (NAHC)
- Require confidentiality of information submitted by a tribe during the environmental review process. (NAHC)
- Require discussion of impacts to Tribal Cultural Resources in the environmental document. (NAHC)
- Conclude consultation with a tribe when parties agree to measures to mitigate or avoid a significant effect, or a party acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (NAHC)
- Recommend mitigation measures agreed upon in consultation. (NAHC)
- Require feasible mitigation pursuant to Public Resources Code section 21084.3(b). (NAHC)
- Recommend mitigation measures that may be considered to avoid or minimize significant adverse impacts to Tribal Cultural Resources. (NAHC)
- Require meeting prerequisites for certifying an EIR or adopting a Mitigated Negative Declaration/ Negative Declaration with a significant impact on a Tribal Cultural Resource. (NAHC)
- Require consulting with the appropriate tribes identified by the NAHC by requesting a Tribal Consultation List. (NAHC)
- Conclude SB 18 tribal consultation when parties come to a mutual agreement concerning mitigation measures or the local government or tribe concludes that mutual agreement cannot be reached. (NAHC)
- Recommend contacting the appropriate regional California Historical Research Information System Center for an archaeological records search. (NAHC)
- Recommend preparation of a professional report detailing findings and recommendations of the research search and field survey if an archaeological inventory survey is required. (NAHC)
- Contact the NAHC for a Sacred Lands File search and Native American Tribal Consultation List. (NAHC)

- Be aware that the lack of surface evidence of archaeological/tribal cultural resources does not preclude their subsurface existence. (NAHC)
- Concerns with tribal consultation and impacts to cultural resources relating to road improvements. (scoping meeting comment)
- Concern with potential impacts to cultural resources from construction of the 62 new transmission line structures along the 96-mile Segment 4 located between the Coolwater Substation and the Ivanpah Substation. (CRIT)
- Require the EIR to broadly consider impacts to cultural resources, including those considered ineligible for the California Register of Historical Resources. (CRIT)
- Require the EIR to ensure that potential impacts to known and unknown cultural artifacts are analyzed and avoided. (CRIT)
- Require the EIR to adequately consider cumulative impacts to cultural resources and describe the methodology used to assess them. (CRIT)
- Describe formal communication to Tribal Governments regarding protocols for virtual public scoping in light of COVID-19. Did Tribal Governments receive instructions on the shift to virtual public meetings? (scoping meeting comment)
- Runs through the Owens Valley and will directly affect known and undisclosed cultural sites. Proper review and study can only occur with tribal consultation and input. (Fort)
- Many cultural sites (in Owens Valley) are "unrecorded" to protect ancestors. Records review will only identify documented sites, which likely did not include tribal perspective or identify "no known cultural resources." An article was provided regarding the Zumstein Collection, which discloses how unauthorized collection of resources has "worked to erase our footprint" in the Owens Valley. (Fort)
- Require SCE to hire tribal monitors to provide a "voice or conscious" for tribes. Require consultation to gain ethnographic information from elders or other tribal members who have knowledge of areas used for spiritual or other purposes. (Fort)

Hydrology and Water Quality

- Require the discussion of potential impacts related to flood zones as depicted in the most recent Federal Emergency Management Agency's Flood Insurance Rate Map. (DPW #2)
- Require the EIR to identify, discuss, and mitigate construction-related impacts to water quality. (Meadowbrook)
- Require permits from the Flood Control District because some project components may cross the Flood Control District's easement and/or property. (DPW #1)
- Require a permit from the San Bernardino County Flood Control District (SBCFCD) if any encroachments on the SBCFCD's facilities or right-of-way occur. (DPW #2)
- Concern with construction impact to water quality. (scoping meeting comment)

Land Use and Recreation

Concern with construction traffic impacts to public safety at Manzanar National Historic Site's two entries/egresses to Highway 395. Recommend schedule coordination with the National Park Service to facilitate safe traffic practices (NPS).

Public Services, Utilities, and Service Systems

Concern with safety hazards associated with the use of helicopters during construction. Recommend coordination of access with Naval Air Weapons Station China Lake. (NAWS)

Transportation and Traffic

- Require a Caltrans Encroachment Permit for any construction activity occurring within, under, or over the State right-of-way for the new installations or any associated activity at the locations identified in the project description. Require a Caltrans Encroachment Permit for utility crossings. (Caltrans District 8 and District 9)
- Require an Encroachment Permit for use of Uniform Traffic Control Devices for traffic control on State highway facilities. Caltrans will also require short-term closure of the highway if lines are strung across the highway. The project should avoid helicopters with loads crossing the highway to also preclude highway closure. (Caltrans District 9)
- Require additional assessment of any State highway access to staging areas. Caltrans may also require an Encroachment Permit if access improvements are required. (Caltrans District 9)
- Consider other adjacent utility easements in some areas. Within the Caltrans right-of-way, Caltrans District 9 can use a consent to common use or joint use agreement for those adjacent easements. (Caltrans District 9)
- The County of San Bernardino Public Works Transportation Permit Section states that non-maintained County roads in Segment 1 and Segment 2 present no conflicts and would not require any permits from the Department of Public Works (DPW). (DPW #1)
- Require a permit for the following County Maintained Road System crossings for the following roads in Segment 3N: Harper Lake Road, Holstead Road, Hinkley Road, Irwin Road, Fort Irwin Road, Daggett-Yermo Road, Santa Fe Street, National Trails Highway; Segment 3S: Helendale Road, Hinkley Road, Serra Road, Tamarack Road, Mountain View Road, Lenwood Road, Bonanza Road, Old Mountain Road, Camp Rock Road, National Trails Highway, Santa Fe Street; Segment 4: Minneola Road, Yermo Road, Afton Canyon Road, Halloran Springs Road, and Cima Road. (DPW #1)

Alternatives

- Include a range of feasible alternatives to ensure that alternatives to the project are fully considered and evaluated, including the "no project" alternative. (CDFW)
- Consider a Disturbed Lands Alternative to confine construction disturbance to already disturbed lands within Segment 4. (CRIT)