July 2019

Final Environmental Impact Report for the

POWER PLANT 1 AND POWER PLANT 2 TRANSMISSION LINE CONVERSION PROJECT

SCH# 2018011039

Los Angeles Department of Water & Power

PREPARED BY

Los Angeles Department of Water & Power
Environmental Affairs

111 North Hope Street, Room 1044
Los Angeles, California 90012

WITH ASSISTANCE FROM

DUDEK

38 North Marengo Avenue
Pasadena, California 91101

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ACOE	U.S. Army Corps of Engineers
BMP	best management practice
CAGN	California gnatcatcher
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNPS	California Native Plant Society
dBA	A-weighted decibel
DOGGR	Division of Oil, Gas, and Geothermal Resources
EIR	Environmental Impact Report
GHG	greenhouse gas
ISA	International Society of Arboriculture
ITP	incidental take permit
kV	kilovolt
LADOT	City of Los Angeles, Department of Transportation
LADWP	Los Angeles Department of Water and Power
LBVI	least Bell's vireo
L_{eq}	equivalent sound level
MLD	Most Likely Descendant
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Communities Conservation Plan
NOA	Notice of Availability
NOP	Notice of Preparation
NO_x	nitrogen oxides
NEPA	National Environmental Policy Act
PAR	Property Analysis Record
PM_{10}	particulate matter less than or equal to 10 microns in diameter
$PM_{2.5}$	particulate matter less than or equal to 2.5 microns in diameter
PP1	Power Plant 1
PP2	Power Plant 2
QSP	Qualified Storm Water Practitioner
SCAQMD	South Coast Air Quality Management District
SWPPP	stormwater pollution prevention plan
USFWS	U.S. Fish and Wildlife Service

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1 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared by the Los Angeles Department of Water and Power (LADWP) to evaluate potential environmental effects that would result from development of the proposed Power Plant 1 (PP1) and Power Plant 2 (PP2) Transmission Line Conversion Project (proposed project). This EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (Cal. Pub. Res. Code Section 2100 et. seq., as amended) and its implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.). LADWP is identified as the lead agency for the proposed project under CEQA. This Final EIR contains comments and responses to comments received on the Draft EIR, which was circulated for public review from May 3, 2019, to June 17, 2019. Revisions and clarifications to the Final EIR made in response to comments received on the Draft EIR are listed in Chapter 2, Clarifications and Modifications. The comments and responses to comments are presented in Chapter 3, Response to Comments on the Draft EIR. A Mitigation Monitoring and Reporting Program (MMRP) is provided in Chapter 4.

1.1 Proposed Project Summary

The proposed project is a transmission line replacement project proposed by LADWP. The project would be located within a linear alignment in northwestern Los Angeles County that generally extends from Haskell Canyon to the community of Sylmar, located south of the City of Santa Clarita. The project would involve replacing a 12-mile segment of an existing 115 kilovolt (kV) double circuit transmission line with a new 230 kV double circuit transmission line (hereafter referred to as the "115 kV line" and the "230 kV line," respectively). The new 230 kV line would be strung with two 230-kV 3 phase circuits; however, only one circuit would be energized upon project completion. The second would be energized in the future, based on availability of future renewable energy supplies. The proposed project would involve demolishing the existing 115 kV line and constructing an approximately 12-mile segment of 230 kV lines and associated transmission structures generally adjacent to the existing 115 kV line. The 115 kV line and most of its associated transmission towers would be removed from Haskell Canyon Switching Station in the north to the line's terminus at Olive Switching Station in the south. The new line would be installed and the old line would be removed within an existing alignment that extends from Haskell Canyon Switching Station in the north to Olive Switching Station and Sylmar Switching Station in the south. The proposed new line would also originate at Haskell Canyon Switching Station. The circuit that would not be energized would terminate at Olive Switching Station, and the energized circuit would terminate at Sylmar Switching Station. The project alignment is approximately 12 miles long and consists of LADWP-owned land and private properties within an LADWP right-of-way. The purpose of this project is to increase the transmission capacity between Haskell Canyon Switching Station and Sylmar Switching Station so that additional renewable energy supplies can be transmitted from the Tehachapi Mountains and Mojave Desert to the Los Angeles basin.

1.2 CEQA Environmental Process

CEQA requires preparation of an EIR when there is substantial evidence supporting a fair argument that a proposed project may have a significant effect on the environment. The purpose of an EIR is to provide decision makers, public

agencies, and the general public with an objective and informational document that fully discloses the environmental effects of the proposed project. The EIR process is intended to facilitate the objective evaluation of potentially significant direct, indirect, and cumulative impacts of the proposed project, and to identify feasible mitigation measures and alternatives that would reduce or avoid the proposed project's significant effects. In addition, CEQA specifically requires that an EIR identify those adverse impacts determined to be significant after mitigation.

Notice of Preparation and Initial Study

In accordance with the CEQA Guidelines, an Initial Study was prepared and a Notice of Preparation (NOP) distributed on January 23, 2018, to public agencies and organizations. The purpose of the NOP was to provide notification that LADWP plans to prepare an EIR and to solicit input on the scope and content of the EIR. In accordance with CEQA Guidelines Section 15082, LADWP distributed the NOP to 48 agencies and organizations, along with a copy of the Initial Study on compact disc. The NOP was also filed with the State Clearinghouse. Additionally, LADWP sent the NOP to addresses within a 500-foot buffer of the project alignment and published the NOP in local newspapers (*Santa Clarita Valley Signal* and *Los Angeles Daily News*). Hardcopies of the Initial Study were available for review at two local libraries (Old Town Newhall Library and Sylmar Branch Library) and at the LADWP Environmental Affairs office. An electronic copy of the Initial Study was made available on LADWP's website. In response to the NOP, 13 written comment letters were received. These letters and the NOP/Initial Study are included in Appendix A of the Draft EIR.

A public agency scoping meeting was held on February 7, 2018, at 6:00 pm at the City of Santa Clarita Activities Center, located at 20880 Centre Pointe Parkway in Santa Clarita. Information regarding the scoping meeting was included in the NOP, which was widely distributed, as described above. The purpose of this meeting was to seek input from public agencies and the general public regarding the environmental issues and concerns that may potentially result from the proposed project. One person, a planner from the City of Santa Clarita Community Development department, attended the meeting. A summary of the proposed project and the CEQA process was presented at the meeting; no specific comments or questions were received at the scoping meeting.

The EIR focuses on the environmental impacts identified as potentially significant during the Initial Study process, including the comments received in response to the Notice of Preparation. The issue areas analyzed in detail in this EIR consist of aesthetics, air quality, cultural resources, geology and soils, greenhouse gas emissions, noise, transportation and traffic, tribal cultural resources, and energy. Other required environmental issue areas have been addressed in the Initial Study, which is included in Appendix A of the Draft EIR, and were determined to require no further detailed analysis in the EIR.

Notice of Availability and Draft EIR

The Draft EIR was circulated for an approximately 45-day public review and comment period starting on May 3, 2019, and concluding on June 17, 2019 (specifically, 46 days). The public review period was conducted pursuant to CEQA and its implementing guidelines. The purpose of the public review period was to provide interested public agencies, organizations, and individuals the opportunity to comment on the contents and accuracy of the document.

The Draft EIR and the Notice of Completion were distributed to the California Office of Planning and Research, State Clearinghouse. A Notice of Availability (NOA) was distributed to approximately 50 relevant legislators, agencies, and community stakeholders, along with a copy of the Draft EIR on Universal Serial Bus (USB) flash drive. Additionally, LADWP sent the NOA to addresses within a 500-foot buffer of the project alignment and published the NOA in local newspapers (*Santa Clarita Valley Signal*, *Los Angeles Daily News*, and *Los Angeles Times*). The NOA stated where the Draft EIR could be reviewed and how to comment. Copies of the Draft EIR were made available to the public for review at two local libraries (Old Town Newhall Library and Sylmar Branch Library) and at the LADWP Environmental Affairs office. An electronic copy of the Initial Study was made available on LADWP's website.

Final EIR

This Final EIR contains comments and responses to comments received on the Draft EIR. Revisions and clarifications made in response to comments received on the Draft EIR are listed in Chapter 2, Clarifications and Modifications. The comments and responses to comments are presented in Chapter 3, Response to Comments on the Draft EIR.

Prior to approval of the proposed project or an alternative to the proposed project, the City of Los Angeles Board of Water and Power Commissioners, as the decision-making entity for the project, is required to certify that this EIR has been completed in accordance with CEQA, that the proposed project has been reviewed and the information in this EIR has been considered, and that the EIR reflects the independent judgment of the lead agency. CEQA also requires the Board of Water and Power Commissioners to adopt "findings" with respect to each significant environmental effect identified in the EIR (Cal. Pub. Res. Code Section 21081; Cal. Code Regs., Title 14, Section 15091). For each significant effect, CEQA requires the approving agency to make one or more of the following findings:

- Changes or alterations to the Project have been made to avoid or substantially lessen significant impacts identified in the Final EIR.
- The responsibility to carry out such changes or alterations is under the jurisdiction of another agency and have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR.

If the Board of Water and Power Commissioners concludes that the proposed project or an alternative to the proposed project will result in significant effects that cannot be substantially lessened or avoided by feasible mitigation measures and alternatives, the Board of Water and Power Commissioners must adopt a "statement of overriding considerations" prior to approval of the proposed project (Pub. Res. Code Section 21081(b)). Such statements are intended under CEQA to provide a written means by which the lead agency balances in writing the benefits of the proposed project and the significant and unavoidable environmental impacts. Where the lead agency concludes that the economic, legal, social, technological, or other benefits outweigh the unavoidable environmental impacts, the lead agency may find such impacts "acceptable" and approve the proposed project.

In addition, the Board of Water and Power Commissioners must also adopt an MMRP describing the changes that were incorporated into the proposed project or made a condition of project approval in order to mitigate or avoid significant effects on the environment (Pub. Res. Code Section 21081.6). The MMRP is adopted at the time of project approval and is designed to ensure compliance during project implementation. Upon approval of the proposed project or an alternative to the proposed project, the lead agency will be responsible for implementation of the proposed project's MMRP. The MMRP is included in this Final EIR as Chapter 4.

1.3 Organization of the Final EIR

This Final EIR is organized as follows:

Chapter 1, Introduction, provides a summary of the proposed project, an overview of the CEQA environmental review process, and a description of the organization of the Final EIR.

Chapter 2, Clarifications and Modifications, shows minor revisions that were made to the text of the Draft EIR. These revisions are shown in strikeout and underline text in this chapter.

Chapter 3, Response to Comments on the Draft EIR, provides a list of agencies, organizations, and individuals commenting on the Draft EIR, copies of the written comments received during the Draft EIR public comment period, and the lead agency responses to those comments.

Chapter 4, Mitigation Monitoring and Reporting Program, provides the MMRP for the proposed project. The MMRP is presented in table format and identifies mitigation measures for the proposed project, the timing of implementation for each measure, and the responsible monitoring agency. The MMRP also provides a section for recordation of mitigation reporting.

2 CLARIFICATIONS AND MODIFICATIONS

The comments received during the public review period for the Draft EIR resulted in several minor clarifications and modifications in the text of the Draft EIR. In addition, minor editorial corrections have been made in sections of the Draft EIR. These changes are incorporated by reference into the Draft EIR. This Final EIR, along with the Draft EIR, constitute a single document that encompasses the final impact analysis for the proposed project.

CEQA Guidelines Section 15088.5 sets forth requirements for why a lead agency must recirculate an EIR. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. New information may include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. As defined in CEQA Guidelines Section 15088.5(a), significant new information requiring recirculation includes the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

None of the revisions that have been made to the EIR have resulted in new significant impacts and none of the revisions have resulted in a substantial increase in the severity of an environmental impact identified in the Draft EIR. No feasible project alternatives or mitigation measures that are considerably different from those set forth in the Draft EIR have been introduced. Furthermore, the Draft EIR is not fundamentally flawed, inadequate, or conclusory in nature. As none of the CEQA criteria for recirculation have been met, recirculation of the EIR is not warranted. As stated in CEQA Guidelines Section 15088.5(b), "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

Revisions to the Draft EIR are shown below and are categorized by section number and page number. Text from the Draft EIR that has been removed is shown in strikethrough (i.e., ~~strikethrough~~), and text that has been added as part of the Final EIR is shown as underlined (i.e., <u>underline</u>). Revisions are shown with surrounding sentences for context.

Mitigation Measures

The mitigation measures listed below and associated descriptive text have been revised in the EIR. The changes shown below apply to each instance that these mitigation measures appear or are discussed throughout the EIR: Executive Summary, Section 3.2 (Air Quality), Section 3.3 (Biological Resources), and Appendix B (Biological Technical Report). In addition to the changes shown below, two mitigation measures presented in the Draft EIR (MM-BIO-1 and MM-BIO-7) have been completed by LADWP subsequent to the release of the Draft EIR. Both measures describe requirements for biological surveys that, due to seasonal constraints, could not be completed prior to release of the Draft EIR. The surveys described in both measures have been completed and no new impacts or mitigation requirements were identified. The associated survey reports are attached to this Final EIR as Attachment A and amend the information presented in Appendix B, Biological Technical Report, in the Draft EIR. Even though two biological resources mitigation measures have been removed, the numbering of the other measures will remain the same as what was presented in the Draft EIR, for the purposes of consistency and readability.

MM-AQ-1

Use of ~~Tier 3~~ Tier 4 Portable Equipment. The Los Angeles Department of Water and Power (LADWP) and/or its construction contractor shall comply with the following measures during construction:

- Prior to the start of construction activities, LADWP shall ensure that all ~~75~~ 50 horsepower or greater diesel-powered portable equipment are powered with CARB certified ~~Tier 3~~ Tier 4 engines, except where LADWP establishes that ~~Tier 3~~ Tier 4 portable equipment is not available supported by substantial evidence such as data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. When feasible, zero-emission or near-zero emission or other alternatively fueled construction ~~Tier 4~~ equipment shall be considered.
- In cases where LADWP is unable to secure a piece of portable equipment that meets the ~~Tier 3~~ Tier 4 engine requirement, LADWP may upgrade another piece of portable equipment to compensate (i.e., a piece of ~~Tier 3~~ Tier 4 equipment would be replaced by ~~a Tier 4 piece~~ zero-emission or near-zero emission or alternatively fueled construction equipment). Alternative applicable strategies may include, but would not be limited to, Tier 3 portable equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily helicopter trips to and from the project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.
- Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans and shall be included in applicable bid documents. Successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. Additionally, LADWP shall require periodic reporting and provision of written documentation by contractors to ensure compliance. LADWP shall also conduct regular inspections to the maximum extent feasible to ensure compliance.
- Note: "Portable" is defined as being designed and capable of being carried or moved from one location to another. Indication of portability includes, but not limited to, wheels, skids, carrying handles, dolly, trailer, or platform. The equipment is not considered portable if the equipment is attached to a foundation or if it resides in a location for more than 12 consecutive months. This definition is referenced in the California Air Resources Board's Regulation to Establish a Statewide Portable Equipment Registration Program in Section 2452(dd).

MM-BIO-6

Burrowing Owl Mitigation and Monitoring Plan ~~Surveys and Avoidance/Relocation~~. If burrowing owl are detected during pre-construction surveys, the Los Angeles Department of Water and Power shall prepare a burrowing owl monitoring and mitigation plan that outlines efforts that will avoid or minimize impacts to the species. The monitoring and mitigation plan will include nest/burrow no intrusion buffer establishment by season; artificial burrow construction, placement, and maintenance design and measures; work site management practices (such as restrictions on rodenticide use); and how passive relocation would occur. The monitoring and mitigation plan will be submitted to the California Department of Fish and Wildlife (CDFW) for review and approval 10 days prior to the commencement of ground-disturbing activities.

Burrowing Owl Preconstruction Surveys. No less than 14 days prior to ground-disturbing activities (vegetation clearance, grading), a qualified wildlife biologist (i.e., a wildlife biologist with previous burrowing owl survey experience) shall conduct pre-construction take avoidance surveys on and within 200 meters (656 feet) of the construction zone within areas of suitable habitat for burrowing owl (i.e., disturbed land, grassland, upland mustard, chamise/annual grass-forb, and unvegetated channels) to identify occupied breeding or wintering burrowing owl burrows. The take avoidance burrowing owl surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (2012 Staff Report; CDFG 2012). Burrows with fresh burrowing owl sign or presence of burrowing owls will be documented. Areas deemed to be unsuitable burrowing owl habitat based on vegetation communities and results of the burrowing owl habitat assessment will be excluded from these surveys. An additional survey will be conducted within 24 hours of actual ground disturbance.

Burrowing Owl Nest/Burrow Buffers. If burrowing owls are detected on site, no ground-disturbing activities shall be permitted within 200 meters (656 feet) of an occupied burrow during the breeding season (February 1 to August 31), unless otherwise allowed by CDFW. During the nonbreeding season (September 1 to January 31), ground-disturbing work can proceed near active burrows as long as the work occurs no closer than 50 meters (165 feet) from the burrow. Depending on the level of disturbance, a smaller buffer may be established in consultation with CDFW. If work must occur within 50 meters of the occupied burrow, then artificial burrows will be constructed in accordance with the monitoring and mitigation plan to provide the owl an option if they choose to vacate the burrow. Burrows will not be closed unless it is determined that the owls may be in direct danger of mortality due to crushing or entrenchment.

Burrowing Owl Artificial Burrows and Passive Relocation. If avoidance of active burrows is infeasible during the nonbreeding season, then, before breeding behavior is exhibited and after the burrow is confirmed empty by site surveillance and/or scoping, a qualified biologist shall implement a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). Passive relocation consists of excluding burrowing owls from occupied burrows and providing suitable artificial burrows nearby for the excluded burrowing owls. ~~If required, a burrowing owl monitoring and mitigation plan shall be prepared that outlines how passive relocation would occur and where the replacement burrows would be constructed. It would also outline the monitoring and maintenance requirements for the artificial burrows.~~

MM-BIO-9

Habitat Preservation and/or Creation. To mitigate for permanent impacts to vegetation communities, habitats for special-status wildlife species and occurrences of special-status plant species, suitable off-site mitigation land shall be acquired. LADWP shall purchase habitat credit through an agency approved mitigation bank or in lieu fee program that ~~or~~ provides for the conservation of habitat generally consistent with the assemblage of vegetation communities impacted by the project and at a minimum of 1:1 mitigation ratio. ~~To avoid and minimize temporary impacts to jurisdictional waters, temporary impact areas (including staging laydown areas, stringing pads, temporary access routes, and temporary work pads) shall be sited to avoid jurisdictional waters to the maximum extent practicable.~~ The proposed project shall mitigate for permanent impacts to jurisdictional waters, including riparian habitat, at a minimum of 1:1 mitigation ratio, or as otherwise determined through the federal and state agency permitting process. Mitigation for permanent impacts to jurisdictional waters would be through the reestablishment, rehabilitation, enhancement, or preservation of jurisdictional waters through an agency approved mitigation bank or in lieu fee program or through permittee-responsible mitigation as defined by the ACOE.

To avoid and minimize temporary impacts to special-status habitats and any special-status biological resources that may be present within, temporary impact areas (including staging laydown areas, stringing pads, temporary access routes, and temporary work pads) shall be sited to avoid these habitats to the maximum extent practicable.

Section 2.7, Page 2-13

Site Rehabilitation

Site rehabilitation activities would be undertaken to return the construction areas to their original condition to the extent feasible. Laydown areas, stringing pads, temporary access routes, and temporary work pads would be rehabilitated. Additionally, tower removal sites would be rehabilitated where they do not coincide with the new tower sites. During grading, the top 6 inches of topsoil would be salvaged and stockpiled, along with the native vegetation, at each distinct project site, with topsoil being segregated based upon the vegetation community type it supports. ~~The~~ Each topsoil type would then be re-applied to the surface of the fill area from which it was removed. Areas that are being rehabilitated would also be re-contoured to natural grade (if the grade was modified during the temporary disturbance activity), and revegetated with native species, as appropriate. Revegetation may occur with container plants, cuttings from native species, or with an application of a native seed mix that are consistent to the pre-construction vegetation composition of each distinct project site. Whenever possible, revegetation would occur prior to or during seasonal rains to promote passive restoration of the area to pre-project conditions (except that no invasive plants would be restored). Prior to seeding temporary ground-disturbance areas, a biologist knowledgeable in local plant species and ecology would review the seeding palette to ensure the plant palette is appropriate for ~~the~~ each project site and that no seeding of invasive plant species, as identified in the most recent version of the California Invasive Plant Inventory for the region would occur.

Section 2.10

The following agencies are added to the list of agencies that may need to grant approvals for the project or portions of the project.

- Los Angeles County Metropolitan Transportation Authority

- South Coast Air Quality Management District
- Southern California Regional Rail Authority

Section 3.3.1, Table 3.3-4, Pages 3.3-14 and 3.3-15

The following changes also apply to Table 7 in Appendix B (Biological Technical Report) of the Draft EIR.

Table 3.3-4. Special-Status Wildlife Species Detected or with Moderate to High Potential to Occur within the Survey Area

Common Name	Scientific Name	Status (Federal/State/ County/City of LA)	Habitat	Potential to Occur
Burrowing owl	*Athene cunicularia* (burrowing sites/ wintering sites)	None/SSC/County of LA/City of LA	Grassland, lowland scrub, agriculture, coastal dunes and other artificial open areas	Moderate potential to occur for wintering. Low potential to occur for breeding. Suitable habitat is present and suitable burrows were observed during 2017 and 2018 field surveys; however, the recorded occurrences within 10 miles of the project alignment are all from fall or winter. Although a focused breeding-season survey was not conducted for this species, individuals and/or sign were not detected during numerous field surveys conducted for the project between 2017 and 2019. This species has known occurrences within ~~5~~ 10 miles of the project area (CDFW 2018a, eBird 2019).

Section 3.3.1, Page 3.3-18 (last paragraph)

The following changes also apply to Section 5.4.2.1 in Appendix B (Biological Technical Report) of the Draft EIR.

The ~~burrowing owl survey~~ study area supports suitable habitat for burrowing owl and numerous suitable burrows occur throughout the project alignment. Although a focused breeding-season survey was not conducted for this species, individuals and/or sign were not detected during abundant field surveys conducted between 2017 and 2019. Nonetheless, numerous suitable burrows for this species were observed within suitable grasslands and open areas within the survey area and the opportunistic species could potentially occupy these areas throughout the year; however, ~~and this~~ the species ~~is known to occur~~ only has fall and winter records within ~~5~~ 10 miles of the project, with no breeding records of the species within that same distance (CDFW 2018a, eBird 2019). Thus, burrowing owl has a moderate potential to occur in the fall and winter in the flat areas within grasslands, chamise/annual grass-forb, disturbed habitat, upland mustards, unvegetated channel, and unvegetated channel/disturbed habitats located throughout the study area, but it has a low potential to breed in the same areas.

Section 3.3.8, Page 3.3-48

The following change also applies to Section 6.3.1 in Appendix B (Biological Technical Report) of the Draft EIR.

Given permanent direct impacts to special-status vegetation communities and land covers are proposed to be minimal and spread out over a large area, and with implementation of MM-BIO-9, permanent direct impacts would be less than significant.

Section 3.3.8, Page 3.3-78

The following reference has also been added to Section 7, Literature Cited, in Appendix B (Biological Technical Report) of the Draft EIR.

eBird. 2019. eBird: An online database of bird distribution and abundance [web application]. Accessed June 2019. http://www.ebird.org.

Section 5.1.2, Page 5-20

MM-AQ-1, which requires use of ~~Tier 3~~ Tier 4 engines for construction equipment, would still be required for Alternative 2 in order to address emissions from construction equipment (see Section 3.2 for the full text of MM-AQ-1). Operational impacts would be the same as those discussed for the proposed project, since maintenance activities would be generally the same. With implementation of MM-AQ-1, the air quality impacts for Alternative 2 are expected to be less than significant with mitigation incorporated.

3 RESPONSE TO COMMENTS ON THE DRAFT EIR

The Draft EIR was distributed for public review on May 3, 2019, through June 17, 2019, pursuant to CEQA Guidelines Section 15105. A total of 15 comment letters were received, and a letter was also received from the State Clearinghouse acknowledging LADWP's compliance with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA.

According to CEQA Guidelines Section 15088(a), "the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response." This chapter provides responses to written comments received during the public review period. Written responses are presented for all comment letters received during the public review period. The comment letters received have each been assigned a letter (e.g., A, B, C). The issues within each comment letter are bracketed and numbered (e.g., A-1, A-2). The comment letters are preceded in this section by responses, which are lettered and numbered to correspond with the bracketed comments. Table 3-1 contains a list of the comment letters.

Comments that present opinions about the project or that discuss issues not related to the substance of the environmental analysis in the Draft EIR are noted but, in accordance with CEQA, did not receive a detailed response. In response to some of the comments received, the text of the EIR has been revised. Refer to Chapter 2, Clarifications and Modifications, for a list of these changes.

Table 3-1. List of Commenters

Comment Letter	Name	Address
A	Chris Moreno	28359 Brookview Terrace, Saugus, California 91350
B	Kevin C. Kenna	kkenna@kckenterprises.com
C	City of Santa Clarita	23920 Valencia Boulevard, Suite 300, Santa Clarita, California 91355
D	Elizabeth Ramquist	eramquist@gmail.com
E	City of Los Angeles, Department of Transportation	6262 Van Nuys Boulevard, Suite 320, Van Nuys, California 91401
F	California Department of Conservation, Division of Oil, Gas, and Geothermal Resources	1000 South Hill Road, Suite 116, Ventura, California 93003
G	South Coast Air Quality Management District	21865 Copley Drive, Diamond Bar, California 91765
H	California Department of Fish and Wildlife	3883 Ruffin Road, San Diego, California 82123
I	County of Los Angeles Fire Department	1320 North Eastern Avenue, Los Angeles, California 90063
J	California Department of Transportation – District 7	100 South Main Street, MS 16, Los Angeles, California 90012
K	Los Angeles County Metropolitan Transportation Authority	One Gateway Plaza, Los Angeles, California, 90012

Table 3-1. List of Commenters

Comment Letter	Name	Address
L	Gabrieleno Band of Mission Indians – Kizh Nation	P.O. Box 393, Covina, California 91723
M	Los Angeles County Public Works	900 South Fremont Avenue, Alhambra, California 91803
N	Los Angeles County Sheriff's Department	211 West Temple Street, Los Angeles, California 90012
O	Santa Monica Mountains Conservancy	5750 Ramirez Canyon Road, Malibu, California 90265

Response to Comment Letter A

Chris Moreno
May 2, 2019

A-1 This comment inquires about the possibility of installing cellular network towers on transmission structures, so that residents in the vicinity of the project alignment can obtain improved internet connections.

This comment does not pertain to the environmental analysis in the EIR. The commenter's questions and suggestions will be provided to decision makers for their review and consideration as part of this Final EIR.

Response to Comment Letter B

Kevin C. Kenna
May 6, 2019

B-1 This comment expresses general opposition to the project and states that the project should not proceed due to its potentially significant environmental impacts.

Pursuant to CEQA, a potentially significant environmental impact does not preclude a project from proceeding. In the event that a potentially significant and unavoidable environmental impact is identified in an EIR, decision makers are required to make a statement of overriding considerations. As stated in Section 15093 of the CEQA Guidelines, "CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'" If a lead agency adopts a project with significant, unavoidable effects, the agency is required to state in writing the specific reasons to support its action.

As stated in Section 2.5 of the Draft EIR, the underlying purpose of the project is to alleviate constraints for transferring renewable energy supplies from the Tehachapi Mountains and Mojave Desert areas to the highly populated Los Angeles basin in order to help LADWP achieve state and local requirements for greenhouse gas (GHG) reductions and an increased renewable energy portfolio. LADWP is subject to state and local regulations that require increasing percentages of its energy to be sourced from renewable resources. For example, Senate Bill 100 states that by December 2030, 60% of electricity sold to retail customers in California per year must be secured from qualifying renewable energy sources. As of 2016, LADWP obtained 29% of its power from renewable sources. At the local level, the City of Los Angeles is directing LADWP to explore ways of achieving a 100% renewable energy portfolio.

The desert areas to the north of the proposed project alignment include Mojave and Tehachapi, which are areas with solar and wind resources that are currently used by LADWP as key sources of renewable energy and that are expected to allow for further expansion of LADWP's renewable energy resources. As described above, LADWP is being required and directed to increase its renewable energy portfolio. Future energy scenarios, including existing and probable renewable energy infrastructure in the Mojave and Tehachapi areas, are expected to result in thermal violations on the transmission lines within the corridor that would be improved by the proposed project. This indicates that line currents would increase to the extent that safety and reliability of the lines may become compromised. Without the proposed project, LADWP would therefore experience constraints for transferring renewable energy supplies from key areas of generation (Mojave and Tehachapi) and a key area of consumption (Los Angeles basin). The

proposed project would alleviate these constraints, thereby allowing LADWP to avoid potential hazards associated with thermal violations.

By allowing for increased transmission of renewable energy supplies to the Los Angeles basin, the proposed project would support compliance with regulatory requirements for GHG reductions and increased renewable energy portfolios. These requirements are set forth to support statewide goals for improving air quality by retiring gas- and coal-fired power plants and minimizing the state's contribution to global climate change by reducing GHG emissions. The proposed project would support the increased use of renewables in the state's largest metropolitan region, thereby contributing to overarching goals for GHG reductions and air quality improvement.

As determined in the environmental impact analysis in the Draft EIR, the proposed project would result in one significant, unavoidable environmental impact, which would occur during project construction. The impact would be caused by air pollutant emissions from heavy-duty helicopters used for hauling transmission structure components to and from difficult-to-reach and environmentally sensitive areas of the project alignment. The heavy-duty helicopter would be in use for approximately 42 days of the total 4-year construction period and would be used for a maximum of 2 days per transmission structure location. The temporary construction impact lasting for approximately 42 days (and approximately 2 days at any given work area) would be outweighed by the long-term environmental benefits of the project in the categories of GHG reductions and improved air quality. The proposed project would also help LADWP comply with state and local regulations for GHG reductions and renewable portfolio standards. The consequences of failing to build the project would potentially include safety hazards along the transmission corridor, difficultly (or failure) to comply with local and state regulations, lost opportunities for reducing GHGs, and lost opportunities for reducing reliance on gas- and coal-fired power plants. As such, the environmental benefits that would be afforded by the project (and the risks that would result from failing to build the project) would outweigh the brief and dispersed nature of the project's significant construction-related environmental impact. Nevertheless, because this EIR has identified a significant, unavoidable environmental impact that would be caused by the proposed project, it will be the responsibility of decision makers (in this case, the City of Los Angeles Board of Water and Power Commissioners) to weigh the benefits of the project against its significant impact before deciding whether to approve the project. The commenter's opposition to the project will be provided to decision makers for their review and consideration as part of this Final EIR.

B-2 This comment states that the project will result in significant noise for 9 hours to 15 hours per day. The comment states that proposed project construction will occur about 100 yards from the commenter's back door and that the noise would make the commenter's home unlivable.

The potential noise impacts of the project are addressed and evaluated in Section 3.7 of the Draft EIR. While the project's construction noise impacts were identified as being potentially significant, mitigation has been provided in the EIR that would reduce these impacts below a level of significance. Furthermore,

due to the linear nature of the project, increased noise levels would be relatively short term (lasting up to two weeks at a given work area). As such, residential receptors along the alignment would not be exposed to increased noise levels for the entirety of the project's construction phase. Due to the linear nature of the project and the geographically distributed construction activities, increased noise levels would be relatively limited in duration at each receptor location. Nevertheless, the commenter's concerns regarding noise will be provided to decision makers for their review and consideration as part of this Final EIR.

B-3 This comment expresses concerns regarding the air quality effects of the proposed project and its long-term health effects.

The potential air quality impacts of the project are addressed and evaluated in Section 3.2 of the Draft EIR. The impact analysis includes an evaluation of the project's effects to sensitive receptors, which include residences. The analysis involves calculating the project's worst-case, maximum construction emissions and comparing this to the South Coast Air Quality Management District (SCAQMD) Localized Significance Thresholds. As shown in Table 3.2-7 of the Draft EIR, project construction would not exceed SCAQMD thresholds. Furthermore, as noted in Section 3.2 of the Draft EIR, construction would last no longer than approximately 5 weeks in one location, after which the construction activities would move to the next location along the 12-mile alignment. As such, emissions would not be concentrated at any one work area along the alignment, further reducing effects for individual receptors. Additionally, the proposed project would not cause an increase in operational activities. As such, long-term emissions would not be generated by the project. Nevertheless, the commenter's concerns regarding air quality will be provided to decision makers for their review and consideration as part of this Final EIR.

B-4 This comment states that the access road for the transmission corridor extends next to the commenter's property and that heavy equipment traveling along the road all day and night would be unacceptable. The commenter states that traffic from filming in the area already causes issues.

The potential traffic impacts of the project are addressed and evaluated in Section 3.8 of the Draft EIR. As with noise and air quality impacts, traffic impacts would be limited in duration at any given location along the project alignment. As stated in Section 3.8, individual work crews would work in different, separate work areas along the proposed alignment. The duration of construction activities at each work area would be relatively short term (lasting up to two weeks at a given work area). Furthermore, as stated in Section 3.8, the project's maximum construction trip generation would not generate enough peak hour traffic to create a significant impact, based on the significance thresholds of the City and County of Los Angeles, the City of Santa Clarita, or the California Department of Transportation. As such, the construction traffic impacts of the proposed project were determined to be less than significant. Nevertheless, the commenter's concerns regarding traffic on the access road near their home will be provided to decision makers for their review and consideration as part of this Final EIR.

B-5 This comment expresses concerns regarding digging along fault lines.

The potential geology and soils impacts of the project are addressed and evaluated in Section 3.5 of the Draft EIR. As stated in that section, the proposed project would not have the potential to increase or exacerbate the potential to fault rupture or the potential for earthquakes to occur. Structure foundations and the methods of structure installation in accordance with seismic design requirements would minimize the potential for structural instability during a seismic event.

B-6 This comment requests that LADWP cancel this project and find another way to transmit power.

The commenter's request to cancel the project will be provided to decision makers for their review and consideration as part of this Final EIR. As described in Response B-1, it is the responsibility of lead agency decision makers (in this case, the City of Los Angeles Board of Water and Power Commissioners) to weigh the benefits of the project against its significant impact before deciding whether to approve the project. It is also noted that a number of project alternatives were examined in Chapter 5 of the Draft EIR, as required by CEQA. The analysis in Chapter 5 compares the environmental effects of the proposed project with those of the alternatives. Decision makers have the authority to approve one of the project alternatives in lieu of the proposed project.

Response to Comment Letter C

City of Santa Clarita
May 7, 2019

C-1 This comment consist of a variety of questions about the project posed by the City of Santa Clarita. LADWP responded to these questions via email on May 22, 2019, as shown in the email above. No further comments were received from the City of Santa Clarita.

The letter from the City of Santa Clarita does not state a specific concern regarding the adequacy of the environmental impact analysis in the EIR. No further response is necessary

Response to Comment Letter D

Elizabeth Ramquist
May 14, 2019

D-1 The commenter states that their family lives near the project alignment and expresses concern regarding the significant impacts that project would have on the environment. The commenter expresses concerns regarding effects to their home environment and their health, particularly due to water quality and air quality impacts. The commenter requests a delay in the project and an investigation of a safer way to improve the use of power and water.

The Draft EIR evaluates the effects of the project on residential sensitive receptors in the vicinity of the project alignment. Localized air quality impacts have been evaluated, as well as noise and transportation and traffic impacts. Water quality impacts have been addressed in the Initial Study for the project (see Appendix A of the Draft EIR). Mitigation measures have been applied to the project to reduce impacts in the categories of air quality and noise. In the categories of transportation and traffic and water quality, impacts were determined to be below a level of significance.

The underlying purpose of the project is to alleviate constraints for transferring renewable energy supplies from the Tehachapi Mountains and Mojave Desert areas to the highly populated Los Angeles basin in order to help LADWP achieve state and local requirements for GHG reductions and an increased renewable energy portfolio. The long-term environmental benefits of the project are substantial when compared to the brief, construction-related impacts of the project. See Response B-1 above for more information and explanation regarding the project's long-term environmental benefits when compared with its relatively brief and dispersed construction-related impacts. Response B-1 also describes some of the regulatory and safety-related drivers of the proposed project.

Chapter 5 of the Draft EIR describes and evaluates potential alternatives to the proposed project, as required by CEQA. Many of the project alternatives were rejected due to infeasibility, failure to meet most of the basic project objectives, and/or inability to avoid significant environmental impacts. The decision to approve or delay the project (or to approve one of its alternatives in lieu of the project) is the responsibility of lead agency decision makers. As such, the commenter's request to delay the project and the commenter's request for LADWP to evaluate ways to improve the use of water and power will be included in the Final EIR for review and consideration by the decision makers.

Response to Comment Letter E

City of Los Angeles, Department of Transportation
May 14, 2019

E-1 This comment states that the City of Los Angeles, Department of Transportation (LADOT) has reviewed in the Draft EIR for the proposed project. The comment states that in the event of any partial or complete street closure within the City of Los Angeles, LADWP would need to prepare a temporary traffic control plan and submit it to LADOT B-Permit Section. The comment provides specific contact information for submitting the traffic control plan(s). The comment also requests that LADWP include LADOT in any response or additional information regarding the project.

In the event of a partial or complete street closure within the City of Los Angeles, LADWP would coordinate with LADOT for the preparation and submittal of the appropriate traffic control plan(s), a necessary. Also, LADWP will retain LADOT on its mailing list for the project, to ensure that LADOT receives project-related communications in the future.

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Response to Comment Letter F

California Department of Conservation
Division of Oil, Gas, and Geothermal Resources
June 11, 2019

F-1 This comment describes the authority of the Division of Oil, Gas, and Geothermal Resources (DOGGR). The comment further states that Public Resources Code Section 3208.1 establishes well reabandonment responsibilities when a previously plugged and abandoned well may be impacted by development or construction. The comment states that local permitting agencies, property owners, and developers should be aware of and understand that significant and potentially dangerous issues may be associated with development near oil, gas, or geothermal wells.

This comment is introductory in nature and does not contain any specific concerns related to the adequacy of the environmental analysis in the EIR. No further response is necessary.

F-2 This comment states that DOGGR reviewed the proposed project and has provided well evaluations to assist in wise land use decisions regarding potential development near oil, gas, or geothermal wells. The comment states that the project is located partially within the Placerita oil field and that DOGGR's records indicate that no known oil, gas, or geothermal wells would be built over or have impeded access within the project boundaries. However, DOGGR identifies 6 wells located within 100 feet of construction work areas associated with the project. These wells and their respective locations relative to the proposed project's construction work areas are identified by DOGGR in this comment letter. The comment further states that the proposed project would extend through an active oil field with numerous active and idle oil and gas wells. The comment states that, despite the above considerations, the identified 6 wells are not expected to be affected by the project and would not require abandonment or reabandonment. However, DOGGR requests notification in the event that planned construction changes or wells are uncovered during construction. A follow-up well evaluation would be required in those instances.

LADWP is aware of the wells within the vicinity of the project alignment and would notify DOGGR in the event that construction work areas change or in the event that a well is encountered during construction.

F-3 This comment provides requirements, recommendations, and guidelines for construction and development on or within the vicinity of oil wells and abandoned oil wells. DOGGR specifically requests that any leaking wells be immediately reported to DOGGR. In the event that any wells are encountered during construction that were not included in the comment letter, DOGGR requests that LADWP notify DOGGR's Coastal District, Ventura office. A site plan with well casing diagrams would then need to be submitted to DOGGR for review.

As stated in this comment, LADWP would adhere to all regulatory requirements regarding existing and abandoned oil wells within proposed project construction work areas. As stated in Comment F-2,

DOGGR does not anticipate any of the wells within the proposed construction work areas to be affected by the project, and these wells are not expected to require abandonment or reabandonment as a result of the proposed project. However, as stated in this comment, in the event that any previously unidentified wells are encountered during construction, LADWP or its construction contractor would notify DOGGR in accordance with DOGGR's requests and protocols. Additionally, in the event that any previously unidentified wells are encountered, LADWP or its construction contractor would test the wells within construction work areas for leaks prior to or during construction. In the event that a leaking well is discovered, LADWP would report the leak to DOGGR, per the requests in this letter.

Response to Comment Letter G

South Coast Air Quality Management District
June 13, 2019

G-1 This comment provides a synopsis of the project and the air quality analysis from the Draft EIR and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the EIR. No further response is necessary.

G-2 This comment provides a synopsis of SCAQMD's 2016 Air Quality Management Plan, which "provides a regional perspective on air quality and the challenges facing the South Coast Air Basin." Specifically, the comment states that "the most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment." This comment is introductory in nature and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the EIR. No further response is necessary.

G-3 This comment states that achieving NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines and that SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. The comment further states that the proposed project plays an important role in contributing to additional NOx emissions during the project's 5-year construction period and that the SCAQMD staff recommends revisions to MM-AQ-1 to further reduce NOx emissions, as well as localized particulate matter less than or equal to 10 microns in diameter (PM_{10}) and particulate matter less than or equal to 2.5 microns in diameter ($PM_{2.5}$) emissions during construction. SCAQMD provided an attachment to the comment letter with more specific recommendations for revising MM-AQ-1.

As indicated in this comment letter, the Draft EIR identified a significant and unavoidable impact relative to NOx emissions. However, as explained in Section 3.2 of the Draft EIR, the project's exceedance in NOx emissions thresholds would be limited to approximately 42 days throughout the project's 4-year construction period and would be spread out throughout a large area, thereby reducing the potential health effects for individual receptors. Furthermore, it is noted that the project would not result in exceedances in PM_{10} or $PM_{2.5}$ thresholds.

With regard to the recommended revisions to MM-AQ-1, LADWP would incorporate the recommended changes. The revisions to MM-AQ-1 are shown below in strikeout/underline. These revisions do not change the determinations of the Draft EIR such that recirculation of the EIR is required. Rather, these revisions expand upon and clarify a mitigation measure that was set forth in the Draft EIR. While MM-AQ-1, as revised, is more stringent relative to the version shown in the Draft EIR, the revisions would not alter the impact determinations in the Draft EIR. Impacts in the category of air quality would remain significant and unavoidable.

MM-AQ-1

Use of ~~Tier 3~~ Tier 4 Portable Equipment. The Los Angeles Department of Water and Power (LADWP) and/or its construction contractor shall comply with the following measures during construction:

- Prior to the start of construction activities, LADWP shall ensure that all ~~75~~ 50 horsepower or greater diesel-powered portable equipment are powered with CARB certified ~~Tier 3~~ Tier 4 engines, except where LADWP establishes that ~~Tier 3~~ Tier 4 portable equipment is not available supported by substantial evidence such as data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. When feasible, zero-emission or near-zero emission or other alternatively fueled construction ~~Tier 4~~ equipment shall be considered.
- In cases where LADWP is unable to secure a piece of portable equipment that meets the ~~Tier 3~~ Tier 4 engine requirement, LADWP may upgrade another piece of portable equipment to compensate (i.e., a piece of ~~Tier 3~~ Tier 4 equipment would be replaced by ~~a Tier 4 piece~~ zero-emission or near-zero emission or alternatively fueled construction equipment). Alternative applicable strategies may include, but would not be limited to, Tier 3 portable equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily helicopter trips to and from the project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.
- Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans and shall be included in applicable bid documents. Successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. Additionally, LADWP shall require periodic reporting and provision of written documentation by contractors to ensure compliance. LADWP shall also conduct regular inspections to the maximum extent feasible to ensure compliance.
- Note: "Portable" is defined as being designed and capable of being carried or moved from one location to another. Indication of portability includes, but not limited to, wheels, skids, carrying handles, dolly, trailer, or platform. The equipment is not considered portable if the equipment is attached to a foundation or if it resides in a location for more than 12 consecutive months. This definition is referenced in the California Air Resources Board's Regulation to Establish a Statewide Portable Equipment Registration Program in Section 2452(dd).

G-4 This comment outlines SCAQMD requirements for permitting of portable engines and portable equipment units of 50 horsepower or greater that emit particulate matter. This comment also states that if such equipment would be used, the SCAQMD should be identified as a responsible agency in the Final EIR.

Proposed project construction is expected to involve equipment requiring SCAQMD permits. LADWP or its construction contractor would adhere to all permitting requirements for construction equipment

used on the project. SCAQMD has been added to the list of permitting agencies for the project as part of the Final EIR (see revisions shown in Chapter 2 of this Final EIR).

G-5 This comment requests that LADWP provide the SCAQMD staff with written responses to their comments prior to certification of the Final EIR. The comment also requests that LADWP address SCAQMD's comments in detail, with reasons why specific comments and suggestions were not accepted and with good faith, reasoned analysis in the responses. This comment also states that LADWP should describe the specific reasons for rejecting the SCAQMD's suggestions in the Final EIR, in the event that SCAQMD's suggestions for revisions to MM-AQ-1 are not incorporated. The comment provides contact information for SCAQMD staff.

Pursuant to CEQA Guidelines Section 15088, LADWP will provide SCAQMD with a copy of this response at least 10 days prior to certification of the Final EIR. LADWP has complied with all CEQA requirements for responding to comments, including the provisions of good faith, reasoned responses. As described in Response G-3, LADWP is incorporating SCAQMD's suggested revisions to MM-AQ-1. LADWP will use the contact information provided by the SCAQMD in the event that any air quality questions arise.

G-6 This comment consists of SCAQMD's recommended revisions to MM-AQ-1.

LADWP has incorporated these recommendations, as shown above in Response G-3.

Response to Comment Letter H

California Department of Fish and Wildlife
June 14, 2019

H-1 This comment states that the California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Availability of a Draft EIR for the proposed project and appreciates the opportunity to provide comments on the aspects of the project that may affect fish and wildlife and the aspects of the project that CDFW may be required to carry out or approve.

This comment is introductory in nature; no further response is required. The Draft EIR (specifically, Section 2.10) states that approvals from regulatory agencies, including CDFW, may be required for project implementation. As stated in Section 2.10 of the Draft EIR, these agencies may use the information in the EIR if their approvals require CEQA or National Environmental Policy Act (NEPA) compliance. A Streambed Alteration Agreement is anticipated to be required from CDFW.

H-2 This comment describes the jurisdiction of CDFW relative to the proposed project. This comment is introductory in nature and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the EIR. No further response is necessary.

H-3 This comment provides a synopsis of the project and the project location from the Draft EIR and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the EIR. No further response is necessary.

H-4 This comment states that CDFW has provided comments and recommendations in their letter to assist LADWP in adequately identifying, avoiding, and/or mitigating the project's impacts on fish and wildlife resources.

The comments and recommendations from CDFW are summarized in responses H-5 through H-23 below. In response to CDFW's comments and recommendations, LADWP has made revisions to the text of the Draft EIR, which are shown below and are also shown in Chapter 2 of this Final EIR. These revisions do not change the determinations of the Draft EIR such that recirculation of the EIR is required. Rather, these revisions clarify and expand upon information contained in the Draft EIR.

H-5 This comment presents concerns regarding effects to burrowing owls. The comment states that the project has the potential to affect burrowing owls and notes that focused burrowing owl breeding season surveys were not conducted as part of the Draft EIR biological studies. The comment further states that the Draft EIR sets forth mitigation measure MM-BIO-6, which requires a preconstruction survey 14 days prior to disturbance using CDFW protocol. The comment states that the CDFW-recommended burrowing owl protocol surveys require that a biologist conduct 4 survey visits during the breeding

season: at least one site visit between February 15 and April 15, and a minimum of 3 survey visits, at least 3 weeks apart, between April 15 and July 15 with at least one visit after June 15.

The Draft EIR contains an analysis of the project's potential effects to burrowing owls. A burrowing owl habitat assessment was conducted, and it was determined that the survey area supports suitable habitat for burrowing owl. Additionally, numerous suitable burrows were found to occur throughout the project alignment during the assessment. However, no burrowing owl individuals and/or sign were detected during the abundant biological field surveys conducted along the project alignment and within the proposed work areas between 2017 and 2019. These findings are described and disclosed in the Draft EIR.

Nevertheless, short-term direct impacts due to unintentional loss of burrowing owl habitat were determined to be potentially significant. In the event that burrowing owls were present in an area of ground disturbance, potentially significant impacts could also occur from destruction of dens, nests, eggs, young, and/or entombment of adults. As stated in the Draft EIR, burrowing owl is a CDFW Species of Special Concern that has experienced declines in California. Loss of individuals and destruction of nests are, therefore, considered potentially significant impacts that could result from the project, as disclosed in the Draft EIR.

In response to identification of potentially significant impacts to burrowing owls and their habitat, the Draft EIR set forth mitigation measures MM-BIO-2 and MM-BIO-6, which are expected to reduce potentially significant impacts to burrowing owl to a level below significance. MM-BIO-2 requires temporary construction fencing to be established around the limits of disturbance for construction work areas to avoid impacts outside of those areas, thereby preventing and reducing unintentional loss of habitat. MM-BIO-6 requires identification of burrowing owls within areas potentially impacted by the project. In the event that burrowing owls are discovered, MM-BIO-6 then requires a variety of protection measures, such as avoidance and establishment of appropriate buffers.

This comment describes the CDFW-recommended protocols for burrowing owl surveys, which consist of 4 survey visits during the burrowing owl breeding season. Burrowing owl is an opportunistic species that could potentially utilize suitable habitat throughout the project's construction period. Due to this behavior and the project's construction period (which would last for approximately 4 years and would involve construction activities throughout all seasons), the species could be present in the proposed construction work areas prior to construction, especially during the fall and winter, regardless of whether the species was detected during prior surveys. Burrowing owls may colonize (or recolonize) unoccupied habitat at any time during the winter or breeding season. For these reasons, a protocol pre-construction survey was recommended and would have been recommended even if negative breeding season surveys had been conducted, due to the presence of suitable habitat and burrowing owl's potential to discover and occupy sites. Due to burrowing owl behavior and the findings of the abundant field surveys conducted along the project alignment and within the vicinity of the alignment, preconstruction surveys in suitable habitat are expected to be more protective of burrowing owls than breeding season surveys.

Conducting focused surveys instead of pre-construction surveys would not clearly lessen the environmental impacts of the proposed project.

Although a focused breeding-season survey was not conducted for this species as part of the project's biological studies, individuals and/or sign were not detected during numerous the field surveys that were conducted for the project between 2017 and 2019. Additionally, based upon the available data from the California Natural Diversity Database and eBird, the species does not have any breeding records within 10 miles of the project alignment. All of the species' records within 10 miles of the alignment are from fall or winter, with almost all records being of a single burrowing owl (typical for overwintering for the species in the region). As such, the potential for the species to breed in the project areas is considered low, while the potential for wintering is considered moderate. Draft EIR Table 3.3-4 and text on page 3.3-18 has been revised to reflect this. Revisions are shown in Chapter 2 of this Final EIR. Based on these revisions, potential effects to nesting burrowing owl would be decreased relative to the findings presented in the Draft EIR. Nevertheless, MM-BIO-6 would still be applied to the project to ensure that significant effects to burrowing owls do not occur as a result of the project.

H-6 This comment states that the language in MM-BIO-6 is unclear relative to when a burrowing owl monitoring and mitigation would be required and who would prepare and approve the plan.

If burrowing owl are detected during the preconstruction survey, a burrowing owl mitigation and monitoring plan will be prepared in sufficient time prior to construction and submitted to CDFW for review and approval. The following changes have been made to MM-BIO-6 as part of the Final EIR in response to this comment. These changes clarify MM-BIO-6 by specifying when the plan would be prepared, who would prepare it, and who would approve it. The changes to the measure also clarify the contents of the plan.

MM-BIO-6

Burrowing Owl Mitigation and Monitoring Plan ~~Surveys and Avoidance/Relocation~~. If burrowing owl are detected during pre-construction surveys, the Los Angeles Department of Water and Power shall prepare a burrowing owl monitoring and mitigation plan that outlines efforts that will avoid or minimize impacts to the species. The monitoring and mitigation plan will include nest/burrow no intrusion buffer establishment by season; artificial burrow construction, placement, and maintenance design and measures; work site management practices (such as restrictions on rodenticide use); and how passive relocation would occur. The monitoring and mitigation plan will be submitted to the California Department of Fish and Wildlife (CDFW) for review and approval 10 days prior to the commencement of ground-disturbing activities.

Burrowing Owl Preconstruction Surveys. No less than 14 days prior to ground-disturbing activities (vegetation clearance, grading), a qualified wildlife biologist (i.e., a wildlife biologist with previous burrowing owl survey experience) shall conduct pre-construction take avoidance surveys on and within

200 meters (656 feet) of the construction zone within areas of suitable habitat for burrowing owl (i.e., disturbed land, grassland, upland mustard, chamise/annual grass-forb, and unvegetated channels) to identify occupied breeding or wintering burrowing owl burrows. The take avoidance burrowing owl surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (2012 Staff Report; CDFG 2012). Burrows with fresh burrowing owl sign or presence of burrowing owls will be documented. Areas deemed to be unsuitable burrowing owl habitat based on vegetation communities and results of the burrowing owl habitat assessment will be excluded from these surveys. An additional survey will be conducted within 24 hours of actual ground disturbance.

Burrowing Owl Nest/Burrow Buffers. If burrowing owls are detected on site, no ground-disturbing activities shall be permitted within 200 meters (656 feet) of an occupied burrow during the breeding season (February 1 to August 31), unless otherwise allowed by CDFW. During the nonbreeding season (September 1 to January 31), ground-disturbing work can proceed near active burrows as long as the work occurs no closer than 50 meters (165 feet) from the burrow. Depending on the level of disturbance, a smaller buffer may be established in consultation with CDFW. If work must occur within 50 meters of the occupied burrow, then artificial burrows will be constructed in accordance with the monitoring and mitigation plan to provide the owl an option if they choose to vacate the burrow. Burrows will not be closed unless it is determined that the owls may be in direct danger of mortality due to crushing or entrenchment.

Burrowing Owl Artificial Burrows and Passive Relocation. If avoidance of active burrows is infeasible during the nonbreeding season, then, before breeding behavior is exhibited and after the burrow is confirmed empty by site surveillance and/or scoping, a qualified biologist shall implement a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). Passive relocation consists of excluding burrowing owls from occupied burrows and providing suitable artificial burrows nearby for the excluded burrowing owls. ~~If required, a burrowing owl monitoring and mitigation plan shall be prepared that outlines how passive relocation would occur and where the replacement burrows would be constructed. It would also outline the monitoring and maintenance requirements for the artificial burrows.~~

H-7 This comment states that the project may result in direct and indirect burrowing owl mortality or injury, disruption of natural burrowing owl breeding behavior, and loss of breeding, wintering, and foraging habitat for the species, as well as cumulative population declines and habitat loss and fragmentation.

The potential impacts to burrowing owl that could occur as a result of the project have been described and analyzed in the Draft EIR. Potentially significant impacts are described as including loss of habitat; destruction of dens, nests, eggs, and young; and entombment of adults. Impacts related to loss of foraging habitat were identified in the Draft EIR but were determined to be less than significant due to the amount of habitat that would be impacted (70 acres) compared with similar habitats proposed to remain in adjacent areas (totaling approximately 1,400 acres within the biological study area). Potentially

significant cumulative impacts were also identified, since other development in the project area would have the potential to affect similar special-status species as those that would be affected by the proposed project (including burrowing owl). However, after mitigation, the project's contribution to these cumulative effects would not be cumulatively considerable (see Section 4.3.3 of the Draft EIR, which contains an analysis of cumulative effects to biological resources).

As such, the potential impacts to burrowing owl that are listed in this comment have been disclosed and analyzed in the Draft EIR. As demonstrated and substantiated in the Draft EIR, the potentially significant impacts would be reduced below a level of significance through implementation of MM-BIO-2 and MM-BIO-6 (as revised). MM-BIO-6 has been revised in response to CDFW's comments, as shown above in Response H-6.

H-8 This comment states that burrowing owl can be seasonally transient and may be hard to detect even when present. The comment then states that a 14-day preconstruction survey window is likely to miss detection. The comment further specifies that non-breeding season surveys may provide information on burrowing owl occupancy but do not substitute for breeding season surveys because results are typically inconclusive.

As described in this comment and in Response H-5, burrowing owl are an opportunistic species that could potentially utilize suitable habitat throughout the project's construction period. Due to this behavior and the project's construction period (which would last for approximately 4 years and would involve construction activities throughout all seasons), the species could be present in the proposed construction work areas prior to construction, especially during the fall and winter, regardless of whether the species was detected during prior surveys. For these reasons, preconstruction surveys would provide the most assurance as to whether burrowing owl are present in a particular construction work area prior to the proposed activities that could potentially affect the species. Surveys occurring too distant from the time of active construction may fail to identify burrowing owl. For these reasons, MM-BIO-6 requires preconstruction surveys for burrowing owl. Furthermore, MM-BIO-6 has been revised and refined in response to comments received from CDFW, as shown in Response H-6. The revisions to this measure clarify and expand on the protective steps that would be taken in the event that burrowing owl is identified.

H-9 This comment states that unmitigated impacts to burrowing owl and their habitat may place additional burden on adjacent properties to allocate resources to protect burrowing owl in the Antelope Valley, should these properties be proposed for development and burrowing owl declines warrant further regulatory protection.

As described in Responses H-5 through H-8, the Draft EIR discloses and analyzes the potential effects of the proposed project on burrowing owl (including potential cumulative effects), which were determined to be potentially significant. MM-BIO-2 and MM-BIO-6 have been set forth and would reduce the effects of the project on burrowing owl to below a level of significance.

H-10 This comment states that protocol surveys are designed for maximizing detection of burrowing owl on the project site for avoidance and mitigation planning, and that a preconstruction survey may miss detection of burrowing owls using the site outside of the survey period, resulting in undisclosed impacts to this species.

See Responses H-5 and H-8. Surveys conducted during the breeding season and/or non-breeding season also have the potential to miss detection of the species, since burrowing owl could move into an area just prior to construction. Preconstruction surveys would provide the most assurance as to the presence or absence of the species in the proposed areas of disturbance. Impacts to suitable burrowing owl habitat would be addressed and reduced through implementation of MM-BIO-2 and through the site rehabilitation phase of project construction. (Note that some revisions have been made to the plans for the site rehabilitation phase as part of the Final EIR. These revisions are shown in Chapter 2 of this Final EIR and are described below in Response H-18. The site rehabilitation efforts that would be part of project construction are expected to reduce temporary impacts to habitat.)

H-11 This comment states that impacts to burrowing owl could result from vegetation clearing and other ground disturbing activities. Project disturbance activities could result in crushing or filling of active owl burrows, causing the death or injury of adults, eggs, and young. This comment also states that the project would remove potential foraging habitat by eliminating native vegetation that supports essential rodent, insect, and reptile populations that are prey for burrowing owl. The comment further states that rodent control activities could result in direct and secondary poisoning of burrowing owl through ingesting treated rodents.

Impacts to burrowing owl have been disclosed and analyzed in the Draft EIR. Potential effects related to death or injury of burrowing owls were determined to be potentially significant impacts of the project. Unintentional loss of burrowing owl habitat was also determined to be a potentially significant impact of the project. The Draft EIR also discloses potential impacts to foraging habitat; however, those impacts were characterized as being less than significant. As stated in the Draft EIR, direct impacts to suitable bird foraging habitat proposed to be impacted (totaling approximately 70 acres) compared with similar habitats proposed to remain in adjacent areas (totaling approximately 1,400 acres within the remaining biological study area) would be minimal, as the affected areas would be spread out over the entire 12-mile project alignment. Open space areas surrounding the project would allow for continued foraging habitat for special-status avian species with the potential to occur in the area (including burrowing owl); thus, loss of foraging habitat for burrowing owl was determined to be less than significant. Regarding rodenticides, MM-BIO-6 has been revised to reflect CDFW's comment regarding the potential for rodent control activities to result in burrowing owl poisoning. As revised, MM-BIO-6 would require the burrowing owl monitoring and mitigation plan to include work site management practices that would protect burrowing owl, such as restrictions on rodenticide use.

Effects to burrowing owl habitat would be addressed through implementation of MM-BIO-2 and through execution of the project's site rehabilitation phase.

H-12 This comment states that project impacts may result in substantial adverse effects, either directly or through habitat modifications, on special-status species. The comment states that burrowing owl qualifies for enhanced consideration afforded to species under CEQA, which can be shown to meet the criteria for listing as endangered, rare, or threatened. The comment further states that adverse impacts to burrowing owl may occur without proper surveys to detect the presence or absence of this species on the project site.

As described in Responses H-5 through H-11, the biological resources analysis in the Draft EIR assessed the project's potential to affect burrowing owl and concluded that the proposed project has the potential to significantly impact burrowing owl. As described in Responses H-5 and H-8, surveys conducted during the breeding season and/or non-breeding season may miss detection of the species, since the species has the potential to move into an area just prior to construction. Given the behavior of this species, the findings of numerous field surveys conducted in the project area from 2017 through 2019, and previous records of the species in the area, preconstruction surveys would provide the most assurance as to the presence or absence of the species in each disturbance area and would provide the most protection to any individuals that may have moved into an area. One of the mitigation measures set forth to reduce potentially significant impacts to burrowing owl (MM-BIO-6) has been revised in response to CDFW's comments to provide further clarity as to the protections that would be provided in the event that burrowing owl is discovered in an area of construction disturbance. Upon implementation of mitigation measures (including the revised MM-BIO-6), impacts to burrowing owl resulting from the project would be reduced below a level of significance.

H-13 This comment states that breeding season protocol surveys should be conducted instead of preconstruction surveys. The comment further states that breeding season protocol surveys would accurately capture the use of the site by burrowing owls. To reduce project impacts to burrowing owl, CDFW recommends that surveys be conducted for burrowing owl in accordance with its March 7, 2012, *Staff Report on Burrowing Owl Mitigation*. The comment states that the results of the breeding season protocol surveys should be disclosed in the Draft EIR to allow CDFW and other interested parties an opportunity to review and comment on impacts and mitigation. The comment further states that protocol surveys should be conducted prior to any project-related habitat disturbance to soil, vegetation, or other sheltering habitat for burrowing owl.

In response to this comment letter, MM-BIO-6 has been revised to clarify and expand on the protective steps that would be taken in the event that burrowing owl is identified (see Response H-6). However, the recommended revision of requiring breeding season protocol surveys instead of preconstruction surveys has not been incorporated for the reasons described in Responses H-5 and H-8.

The proposed project would involve over 70 work areas across a 12-mile alignment. As noted in the above comments and responses, burrowing owl can be difficult to detect. As such, burrowing owl could move into suitable habitat along the 12-mile alignment at any time during the project's 4-year construction period. Conducting breeding season protocol surveys and publishing the results in the Draft EIR (which was published nearly a year before the anticipated start of construction) would not provide any conclusive indication as to whether or not burrowing owl would be present in any of the numerous work areas prior to disturbance. Based on these considerations, preconstruction surveys were determined to provide the most conclusive evidence of the species and the most protection for the species, in the event that any were to be present.

H-14 This comment states that, based on the results of the burrowing owl protocol surveys, the Final EIR should propose avoidance measures and project alternatives that would eliminate or reduce impacts to the species.

In response to this comment, the text of MM-BIO-6 has been revised. In the event that burrowing owl are detected, MM-BIO-6, as revised, requires avoidance and minimization of impacts to the species. Avoidance could include modifying the location or size of a particular construction work area. The revised measure also incorporates a variety of alternatives that may be selected for avoidance and/or minimization of impacts, in the event that burrowing owl are identified.

H-15 This comment states that permanent impacts to occupied burrowing owl burrows and adjacent foraging habitat should be mitigated for by setting aside replacement habitat to be protected under a conservation easement. This comment also states that CDFW recommends that LADWP require a burrowing owl mitigation plan to be submitted to CDFW for review and approval prior to project implementation.

MM-BIO-6 has been revised to require that LADWP prepare and submit a burrowing owl monitoring and mitigation plan to CDFW for review and approval, in the event that burrowing owl are detected. As described in MM-BIO-6, the plan would outline efforts to avoid or minimize impacts to the species. Minimization of impacts could include long-term habitat protection measures.

H-16 This comment states that use of rodenticides should be avoided, since it could result in direct or secondary poisoning to burrowing owl.

MM-BIO-6 has been revised to require restrictions on rodenticide use as part of the burrowing owl monitoring and mitigation plan that would be submitted to CDFW, in the event that the species is identified.

H-17 This comment states that there would be 5.02 acres of temporary impacts and 2.31 acres of permanent impacts to 12 special-status vegetation communities. This comment also states that the Draft EIR appears to omit acreage from its vegetation mapping, due to changes in the project footprint that occurred after initial vegetation mapping efforts. The commenter states that failure to include vegetation

mapping for a portion of the project's disturbance areas may indicate that the Draft EIR has not disclosed all of the project's impacts.

As shown in Table 3.3-10 of the Draft EIR, there are 13 special-status vegetation communities and land covers that would be temporarily and/or permanently impacted by the proposed project.

As shown in Table 4 (Schedule of Surveys) in the Appendix D of the Draft EIR, the vegetation mapping, habitat assessment, and jurisdictional delineation were updated in January 2019 based upon the revised footprint. The only survey that was not updated subsequent to the changes in footprint is the California gnatcatcher survey. California gnatcatcher surveys were not conducted before release of the Draft EIR due to seasonal constraints. However, California gnatcatcher surveys have since been conducted (after the release of the Draft EIR). Survey results are presented in Attachment A of this Final EIR. As shown in Attachment A, focused surveys were conducted in May 2019 and June 2019, and no California gnatcatcher individuals or nests were detected.

H-18 This comment expresses concerns regarding MM-BIO-9, as presented in the Draft EIR. The commenter states that the project would impact seven sensitive, non-riparian vegetation communities and nine sensitive riparian vegetation communities.

As shown in Table 3.3-10 of the Draft EIR, there are only six sensitive riparian vegetation communities that would be impacted by the project. MM-BIO-9 states that the riparian sensitive vegetation communities would be mitigated by acquiring off-site, generally consistent habitat, at a minimum ratio of 1:1 or through permitting requirements. However, the commenter states that it is unclear whether the seven sensitive, non-riparian vegetation communities would also be mitigated at a minimum 1:1 ratio. The seven, non-riparian sensitive vegetation communities will also be mitigated at a minimum 1:1 ratio. A minor change has been made to MM-BIO-9 (see below) to clarify this.

MM-BIO-9

Habitat Preservation and/or Creation. To mitigate for permanent impacts to vegetation communities, habitats for special-status wildlife species and occurrences of special-status plant species, suitable off-site mitigation land shall be acquired. LADWP shall purchase habitat credit through an agency approved mitigation bank or in lieu fee program that ~~or~~ provides for the conservation of habitat generally consistent with the assemblage of vegetation communities impacted by the project and at a minimum of 1:1 mitigation ratio. ~~To avoid and minimize temporary impacts to jurisdictional waters, temporary impact areas (including staging laydown areas, stringing pads, temporary access routes, and temporary work pads) shall be sited to avoid jurisdictional waters to the maximum extent practicable.~~ The proposed project shall mitigate for permanent impacts to jurisdictional waters, including riparian habitat, at a minimum of 1:1 mitigation ratio, or as otherwise determined through the federal and state agency permitting process. Mitigation for permanent impacts to jurisdictional waters would be through the reestablishment, rehabilitation, enhancement, or preservation of jurisdictional waters through an agency

approved mitigation bank or in lieu fee program or through permittee-responsible mitigation as defined by the ACOE.

To avoid and minimize temporary impacts to special-status habitats and any special-status biological resources that may be present within, temporary impact areas (including staging laydown areas, stringing pads, temporary access routes, and temporary work pads) shall be sited to avoid these habitats to the maximum extent practicable.

H-19 This comment states that the mitigation measures presented in the Draft EIR to reduce impacts on CDFW sensitive vegetation communities (MM-BIO-1 and MM-BIO-9) would not adequately address impacts. The comment further specifies that MM-BIO-1 appears to focus more on mitigating rare plant species rather than mitigating impacts to sensitive vegetation communities. The comment also states that MM-BIO-9 includes a minimum 1:1 habitat preservation or creation, but only for impacts to sensitive vegetation communities within CDFW Section 1600 jurisdiction. The comment further explains that CDFW considers grading a vegetation community to be a permanent impact unless mitigation is proposed that includes specific criteria to ensure that the exact vegetation community is recreated, with consideration to the temporal loss of habitat as well as defined success criteria and weed management. The commenter states that revegetation or acquisition/preservation would be deemed to adequately offset impacts to CDFW sensitive vegetation communities. More specifically, the commenter expresses concerns regarding the proposed reapplication of topsoil. CDFW would not consider reapplying 6 inches of topsoil as adequate mitigation for sensitive vegetation communities. Additionally, the commenter expresses concerns that soil from the 12-mile alignment would be stockpiled without keeping the topsoil for each vegetation community separated. The commenter states that combining all vegetation communities or using one seed mix to rehabilitate all disturbed areas along the alignment would introduce native plant species into areas where they do not currently occur.

In response to these concerns, the protocol for the project's site rehabilitation phase has been further defined. Site rehabilitation for temporary impacts is described in Section 2.7 of the Draft EIR and is considered part of the project's construction activities. The description of the site rehabilitation phase has been expanded in this Final EIR, such that stockpiling of topsoil would occur at each distinct construction work area, with topsoil being segregated based upon vegetation community type. Each stockpile of topsoil would be reapplied to the site from which it was removed. Any container plants, cuttings from native species, or native seed mix used would be consistent to the pre-construction vegetation composition of each distinct project work area. These additions to the site rehabilitation discussion are shown in Chapter 2 of this Final EIR.

H-20 This comment states that the project would involve a constant need to clear vegetation for access, fuel modification, and other operations. The comment states that these activities would serve as a pathway to allow invasive plant species to establish and proliferate in areas where vegetation is graded or thinned.

The establishment and proliferation of invasive plant species would have a negative impact on the surrounding habitat.

The proposed project would involve replacement of a transmission line within an existing transmission corridor. This corridor supports two other transmission lines, which would remain in place with or without the project. As such, the types of operational and maintenance activities described in this comment currently occur along this transmission corridor and would continue to occur with or without the proposed project. The proposed project would not involve expansion of the transmission corridor or intensification of operational activities. As stated in Section 2.8 of the Draft EIR, an upgrade from 115 kV lines to 230 kV lines would not require additional clearances other than those that are currently being maintained along the alignment. Consistent with current practices, LADWP would continue to adhere to precautions and procedures for minimizing ground disturbance, noise, and hazards during operational activities and to protect plants, wildlife, and other resources of significance while any necessary repairs are being conducted. Restoration procedures following completion of repair work would be similar to those prescribed for normal construction activities (see Section 2.8 of the Draft EIR). No changes in operational activities would occur under the proposed project such that significant impacts would result. Maintenance of the transmission corridor would continue regardless of the proposed project, and LADWP has procedures and best management practices in place that would continue to protect sensitive resources during operations and maintenance activities.

H-21 This comment states that CDFW considers vegetation communities, alliances, and associations with a statewide ranking of S1, S2, S3, and some S4 as sensitive. These communities are declining at the local and regional level. The comment states the proposed project may have direct or indirect effects to these sensitive vegetation communities.

The Draft EIR discloses and analyzes the potential direct and indirect effects of the project on CDFW sensitive (labeled as special-status in the Draft EIR) vegetation communities (see specifically Section 6.3.1 and 6.3.2 of Appendix B in the Draft EIR). Per CDFW's webpage, "Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents" (CDFW 2019). The analysis in the EIR adheres to this direction.

Temporary direct impacts to special-status vegetation communities were determined to be less than significant, because the affected areas would be restored following completion of construction. Permanent direct impacts were also determined to be less than significant, given that such impacts were determined to be minimal and spread out over a large area. Indirect impacts to sensitive vegetation communities were determined to be potentially significant. However, implementation of mitigation measures MM-BIO-2, MM-BIO-3, and MM-BIO-4 would reduce these impacts to below a level of significance. As such, the project's impacts to sensitive vegetation communities have been addressed in the EIR, and mitigation measures have been identified as necessary to ensure that such impacts would not be significant.

H-22 This comment states that any revegetation effort should represent the actual vegetation community being impacted. The comment further specifies that the species mix within a vegetation alliance may change across the alignment. The comment expresses concerns that spreading a generic seed mix that is not representative of the unique plant community alliances in the project area would impact the existing habitat, introduce species to an area, and change the structure of vegetation communities. Using a seed mix of plants not found in a particular area could area increase the risk of failure.

In response the concerns expressed in this comment, the details of the "site rehabilitation" phase of construction have been modified. These changes have been made to the text of the EIR and are presented in Chapter 2 of this Final EIR. Execution of the site rehabilitation phase, as revised, would ensure that native seed mixes used for rehabilitation would be tailored for the vegetation community that inhabits each construction work area under pre-project conditions.

H-23 This comment states that the proposed project would include grading, vegetation clearing, road construction, utilities construction, road maintenance, fuel modification, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive vegetation communities. The comment further states that project impacts may result in substantial adverse effects, either directly or through habitat modifications, on vegetation communities identified by CDFW as sensitive.

As described in Response H-21, the Draft EIR analyzes and discloses the project's impacts to sensitive vegetation communities. Mitigation measures were incorporated into the Draft EIR and MM-BIO-9 has been updated based on comments provided by CDFW in this comment letter to further reduce potentially significant impacts to below a level of significance.

H-24 This comment describes the CDFW filing fees that would be required for the project.

LADWP would be required to pay the appropriate CDFW filing fees and would do so at the time that the Notice of Determination if filed for the project, in the event that the project is approved and the EIR is certified.

H-25 This comment states that CDFW appreciates the opportunity to comment on the project. The commenter requests that CDFW be given an opportunity to review and comment on any responses from LADWP and that CDFW also be notified of any forthcoming hearing date(s) for the project. This comment also provides contact information for any questions or coordination related to CDFW's comments.

As required by CEQA Guidelines Section 15088, LADWP will provide a written response to CDFW at least 10 days prior to the certification hearing for this EIR. Additionally, LADWP will retain CDFW on its mailing list for the proposed project, to ensure that CDFW receives notices pertaining to the project, including any notifications of hearings.

References

CDFW (California Department of Fish and Wildlife). 2019. "Natural Communities." Webpage. Accessed July 19, 2019. https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities.

Response to Comment Letter I

County of Los Angeles Fire Department
May 31, 2019

I-1 This comment states that the Notice of Availability of the Draft EIR for the project was reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. No response is required.

I-2 This comment states that the Planning Division of the County of Los Angeles Fire Department has no comments regarding the project. No response is required.

I-3 This comment, provided by the Land Development Unit of the County of Los Angeles Fire Department, states that the proposed project does not propose construction of structures or any other improvements at this time and that the proposed project would not have a significant effect on the Land Development Unit until actual construction is proposed.

The proposed project would involve construction of a new 230 kV transmission line. Construction is anticipated to commence as early as fall 2019. As determined through the analysis in the EIR, no potentially significant effects pertaining to fire protection services would occur. The Draft EIR identified one significant, unavoidable impact in the category of air quality. However, this impact would be limited to the project's temporary construction period.

I-4 This comment lists the statutory responsibilities of the Forestry Division of the County of Los Angeles Fire Department. The comment states that potential impacts in the categories of erosion control, watershed management, rare and endangered species, vegetation, fuel modification in Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance should be addressed. The comment further states that under the Los Angeles County Oak Tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus that is 25 inches or more in circumference, as measured 4.5 feet above mean natural grade. The comment states that if oak trees are known to exist in the proposed project area, further field studies should be conducted to determine the presence of oak species on the project site.

Potential impacts in the environmental categories listed by the Forestry Division have been covered in the EIR. Erosion, water, water quality, and wildfire hazards are evaluated in the project's Initial Study, which is contained in Appendix A of the Draft EIR. Special-status species, vegetation, and oak trees are discussed in Section 3.3 of the Draft EIR. Archaeological and cultural resources are discussed in Section 3.4 of the Draft EIR. No significant, unavoidable impacts were identified in these categories.

Section 3.3.5 of the Draft EIR specifically discusses whether the proposed project would conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or

ordinance. Oak trees protected under the County's oak tree ordinance may be present in the project area and could be affected by the project. Mitigation measure MM-BIO-10 has been included in the EIR to ensure compliance with applicable tree protection ordinances. While County-protected oak trees are known to exist in the project area, MM-BIO-10 would ensure that proper identification, permitting, and mitigation is performed for such trees.

I-5 This comment states that the Health Hazardous Materials Division of the County of Los Angeles Fire Department has no comments or requirements for the proposed project. No response is required.

Response to Comment Letter J

California Department of Transportation – District 7
June 5, 2019

J-1 This comment summarizes the proposed project and states that, after reviewing the Draft EIR for the project, the California Department of Transportation does not expect that project approval would result in a direct adverse impact to existing state transportation facilities. No response is required.

Response to Comment Letter K

Los Angeles County Metropolitan Transportation Authority
June 17, 2019

K-1 This comment states that the Los Angeles County Metropolitan Transportation Authority (Metro) has recommendations related to Metrolink facilities and services that may be affected by the project. The comment states that Metro has provided LADWP with the "Metro Adjacent Development Handbook," which includes an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW). Metro has also provided LADWP with the "Adjacent Construction Manual," which contains technical information. These two documents are attached to Metro's comment letter.

This comment is introductory in nature. LADWP acknowledges the project's proximity to Metrolink facilities and Metro-owned ROW and is in receipt of the handbook and manual provided by Metro as part of its comment letter. (These two documents are also included in this Final EIR for informational purposes and to disclose the information in the documents to decision makers.)

K-2 This comment contains a synopsis of the proposed project from the Draft EIR. The comment also states that the project is located over or adjacent to Metrolink services. No response is required.

K-3 This comment states that the project alignment intersects Metro-owned ROW where the Southern California Regional Rail Authority (SCRRA) operates and maintains the Metrolink commuter rail service at multiple locations: The Old Road and State Route (SR) 14 and Interstate (I) 5 and I-210. Union Pacific Railroad freight trains also operate on this line. In this comment, Metro advises LADWP that rail service operates in both directions on this line and that trains may operate 24 hours a day, 7 days a week.

LADWP appreciates this information regarding Metro service near the project alignment. This information has been added to the project files. LADWP construction personnel and/or LADWP's construction contractor will be made aware of Metro operations near the project alignment. Permits have been obtained from SCRRA for the identified crossings.

K-4 This comment states that where the project alignment is adjacent to the Metro ROW, any structures associated with the proposed project should be set back at least 5 feet from the property line to allow adequate space for property maintenance. Property owners (in this case, LADWP) are not allowed access to Metro ROW for property maintenance purposes. Any access to the ROW would be at the discretion of Metro and Metrolink. The comment further states that, where feasible, fencing and walls at or near the property lines must be maintenance from the private property side (not the Metro ROW side).

The proposed project structures would be located entirely within LADWP's transmission line ROW. Structures would not be placed within 5 feet of Metro's ROW. Access to Metro's ROW would be required for the project; however, LADWP has obtained the necessary permits.

K-5 This comment states that any future work performed related to the proposed project that requires access to or over the railroad ROW shall be covered by specific Right-of-Entry temporary access permits with specific requirements. The commenter states that SCRRA should be contacted for these Right-of-Entry requirements. Such requirements may include permits for construction of structures, overhead lines, and any future repairs, including use of overhead cranes or any other equipment that could potentially affect rail operations and safety.

Two crossings of the railroad ROW have been identified for project construction: San Fernando Road/Golden State Road and Soledad Canyon Road/Golden Valley Road. LADWP has obtained permits from SCRRA for these crossings. The permit number for the San Fernando Road/Golden State Road is SCRRA Project No. 881794, and the permit number for the Soledad Canyon Road/Golden Valley Road is SCRRA Project No. 881792. LADWP would adhere to permit requirements to ensure that safety and rail operations are maintained.

K-6 This comment states that Metro and/or SCRRA staff may monitor construction activity to ascertain any impacts to the railroad ROW. This comment also states that a protection barrier must be established to prevent objects from falling onto the railroad ROW during construction and that LADWP must notify Metro and SCRRA of any changes to the construction plans that could affect the railroad ROW.

LADWP would coordinate with Metro and SCRRA to alert them of when construction is planned near or over the railroad ROW and to alert them of any changes in construction plans near or over the railroad ROW. Additionally, as stated in Chapter 2 of the Draft EIR, LADWP would establish temporary guard structures at major crossings (including railroad crossings) as necessary.

K-7 This comment states that Metro Real Estate requires license agreements for overhead crossings, if agreements do not already exist. This comment also states that Metro requests site-specific drawings to determine whether LADWP already has licenses at the project's crossings.

The proposed project would occur within an existing LADWP transmission line corridor that currently contains three transmission lines. LADWP has license agreements at the project's crossings. For the San Fernando Road/Golden State Road crossing, the existing Agreement No./Easement Deed No. is LADWP P-26514. For the Soledad Canyon Road/Golden Valley Road crossing, the existing Agreement No./Easement Deed No. is LADWP P-26226.

K-8 This comment provides contact information for Metro. It also lists attachments and links to aid LADWP with planning for construction near and over Metro's ROW.

LADWP will use the contact information provided to coordinate with Metro for the proposed project's railroad crossings as needed. LADWP is also in receipt of the attachments (the "Adjacent Construction Design Manual," the "Adjacent Development Handbook," and the "Metrolink Right of Way Encroachment Procedures") and will refer to the provided information as necessary. This comment does not contain any specific concerns related to the adequacy of the environmental analysis in the EIR. No further response is necessary.

Response to Comment Letter L

Gabrieleno Band of Mission Indians – Kizh Nation
June 17, 2019

L-1 This comment states that if the project involves ground disturbance, the Gabrieleno Band of Mission Indians – Kizh Nation would like to consult with LADWP.

LADWP notified the Gabrieleno Band of Mission Indians – Kizh Nation of the proposed project under Assembly Bill (AB) 52 on September 2, 2017. This notification letter included a project map and description inquiring if the tribe would like to consult to discuss the project and the potential to impact any tribal cultural resources (TCRs). On September 27, 2017, the Gabrieleno Band of Mission Indians – Kizh Nation responded with a request to initiate formal tribal consultation. LADWP responded to this request via certified mail on October 3, 2017. On October 25, 2017, LADWP conducted a conference call with the Gabrieleno Band of Mission Indians – Kizh Nation. No further responses or communications were received from the Gabrieleno Band of Mission Indians – Kizh Nation, and no specific TCRs were identified as a result of this consultation or as a result of other consultations for the project carried out under AB 52. However, the Fernandeño Tataviam Band of Mission Indians requested that specific mitigation measures be provided in the EIR to protect any previously undiscovered TCRs that could be uncovered during project construction. LADWP put forth mitigation measures MM-TCR-1 through MM-TCR-4 to reduce potential impacts to such resources, in the event that any are present in areas of construction ground disturbance. On April 16, 2019, LADWP distributed the text of these mitigation measures to tribes that requested consultation for the proposed project, including the Gabrieleno Band of Mission Indians – Kizh Nation. No responses or feedback were received.

As described above, LADWP has been engaged with the Gabrieleno Band of Mission Indians – Kizh Nation regarding the proposed project since 2017. The period for AB 52 consultation has since concluded. No comments were received from the Gabrieleno Band of Mission Indians – Kizh Nation regarding the four mitigation measures that are set forth to protect previously undiscovered TCRs, and no specific TCRs have been identified by the Gabrieleno Band of Mission Indians – Kizh Nation within the project area in any of their communications with LADWP regarding the proposed project.

Response to Comment Letter M

Los Angeles County Public Works
June 19, 2019

M-1 This comment states that a portion of the proposed project is within Bouquet Canyon, and the Los Angeles County Flood Control District (LACFCD) owns and operates stormwater infrastructure in that area. The commenter requests that LADWP identify in the EIR where the proposed transmission structures would be placed and how they would affect LACFCD regarding road closures for the installation of the proposed structures and lines.

The locations of the proposed transmission structures and construction work areas are shown in Appendix B3 of the Draft EIR. Additionally, LADWP has submitted engineering plans for crossings over LACFCD channels and storm drains through the Los Angeles County Electronic Permitting and Inspections online portal. The permitting process is currently underway.

As described in Section 3.8 of the Draft EIR (Traffic and Transportation), temporary road closures may be periodically required. LADWP would prepare and implement traffic controls plans for the project, which would define the locations of the road closures and would define the use of flag persons, warning signs, lights, barricades, cones, etc. that would be used to safely direct vehicles around road closures. The traffic control plans would set forth construction practices that would help avoid disruptions or delays in access. Once specific road closures are known in the Bouquet Canyon area, LADWP would also coordinate with LACFCD to alert them of such closures.

M-2 This comment references the Hydrology and Water Quality analysis in the Initial Study for the proposed project. The comment states that while environmental impacts may be considered less than significant, LADWP will still be required to demonstrate during the project's permitting processes that the proposed project elements would not increase flood levels in floodplains.

As stated in the Initial Study for the project, the proposed project is not anticipated to have effects on flooding. As indicated, portions of the alignment extend across areas designated as 100-year floodplains, including the Santa Clara River. Although the locations of new transmission structures would differ slightly from the location of the existing structures, the footprint of each new structure would be insufficient in size to result in measurable changes in the volume, velocity, or extent of flood hazards, due to the small cross-sectional area that the transmission structure footings would occupy. Nevertheless, LADWP would comply with all necessary design and engineering requirements related to construction within a floodplain and would coordinate with LACFCD as needed.

M-3 This comment also references the Hydrology and Water Quality analysis in the Initial Study for the proposed project. The comment states that any construction with 100-year floodplains requires compliance with the requirements of Title 44 of the Code of Federal Regulations, Part 60.3. The

comment also states that any construction within unincorporated Los Angeles County will require compliance with the requirements of Los Angeles County Code Title 20, Section 20.94.040. For any construction within the property or ROW of the County of Los Angeles and the LACFCD, the County requires compliance with the requirements of Title 44 of the Code of Federal Regulations, Part 60.3, and Los Angeles County Code Title 20, Sections 20.94.030 and 20.94.040. The comment also provides a contact that LADWP can use for further information regarding these code requirements.

LADWP would adhere to all code requirements during construction and operation of the proposed project, including requirements pertaining to floodplains.

M-4 This comment states that Los Angeles County Public Works requests the opportunity to review future environmental documentation for the project, when it is available. This comment also provides contact information for any questions or additional information that LADWP may have.

As required by CEQA Guidelines Section 15088, LADWP will provide this response to Los Angeles County Public Works at least 10 days prior to the certification hearing for this EIR. Additionally, LADWP will retain Los Angeles County Public Works on its mailing list for the proposed project, to ensure that Los Angeles County Public Works receives notices pertaining to the project, including any notifications of hearings.

Response to Comment Letter N

Los Angeles County Sheriff's Department
June 20, 2019

N-1 This comment provides a synopsis of the project and its location from the Draft EIR. The comment states that the project would be located within the service area of the Santa Clarita Valley Station. The station reviewed the Draft EIR and provided comments that are attached to this letter (comments N-2 and N-3). This comment also provides updated contact information for the Los Angeles County Sheriff's Department.

This comment does not state a concern or question regarding the adequacy of the environmental impact analysis in the EIR. LADWP will use the updated contact information that was provided for future communications. No further response is necessary.

N-2 This comment states that the Santa Clarita Valley Sheriff's Station review the Notice of Availability of the Draft EIR for the proposed project. The comment states that the project would not alter population in the project area and, therefore, would not alter service ratios, response times, or other performance objectives to the extent that new or expanded police protection facilities, equipment, or staff would be required.

This comment summarizes the proposed project and the public services analysis provided in the project's Initial Study. This comment does not state a concern or question regarding the adequacy of the environmental impact analysis in the EIR; no further response is necessary.

N-3 This comment summarizes analysis provided in the Draft EIR and Initial Study regarding traffic safety hazards, emergency access, public transit, pedestrians, and bicycles and states that impacts were determined to be less than significant. This comment also summarizes statements from the Draft EIR regarding road closures, coordination with applicable jurisdictions, and provision of emergency vehicle access during construction. The comment states that the Santa Clarita Valley Sheriff's Station does not dispute any of these conclusions and statements from the Draft EIR regarding traffic safety, access, and road closures. The comment states that the Santa Clarita Valley Sheriff's Station has no further comments but reserves the right to amend or supplement their assessment upon subsequent review of the project. The comment also provides contact information for any future questions.

This comment does not state a concern or question regarding the adequacy of the environmental impact analysis in the EIR; no further response is necessary. As required by CEQA Guidelines Section 15088, LADWP will provide this response to the Los Angeles County Sheriff's Department at least 10 days prior to the certification hearing for this EIR. Additionally, LADWP will retain the Los Angeles County Sheriff's Department on its mailing list for the proposed project, to ensure that the Los Angeles County Sheriff's Department receives future notices regarding the project.

Response to Comment Letter O

Santa Monica Mountain Conservancy
June 24, 2019

O-1 This comment states that the proposed project alignment extends through two sections of the Angeles National Forest and through protected open space owned by the City of Santa Clarita, Mountains Recreation and Conservation Authority, and the Santa Clarita Watershed Recreation and Conservation Authority. The comment further states that the project alignment extends through habitat areas within the San Gabriel and Sierra Pelona Mountains and crosses the Santa Clara River. The comment states that over 1,000 acres would be subject to permanent or temporary biological impacts as a result of the project. The comment further states that the Draft EIR for the project is deficient for not addressing that the affected areas are integral to regional ecosystems and that the project alignment and associated access roads extend through thousands of acres of protected habitat areas.

The Draft EIR contains a biological resources impact analysis, summarized in Section 3.3 of the Draft EIR and detailed in Appendix D, Biological Technical Report. The biological technical report prepared for the project is over a thousand pages in length and contains documentation and analysis of the habitat areas and biological resources that could be affected by the project. The proposed project is not within the Angeles National Forest boundaries. However, as noted throughout the EIR, the proposed project would extend through areas of open space, including Whitney Canyon Park and Elsmere Canyon Open Space. Whitney Canyon Park is owned by the Santa Clarita Watershed Recreation and Conservation Authority, and Elsmere Canyon Open Space is owned by the City of Santa Clarita. Effects to these areas and the habitats within them are described and analyzed in the Draft EIR. The Draft EIR analysis also includes consideration of effects to regional habitat linkages and wildlife movement corridors, as well as cumulative impacts to biological resources. While potentially significant impacts to biological resources were identified, impacts would be reduced to below a level of significance through incorporation of mitigation measures.

This comment conflates the biological survey acreage with the acreage of areas that could potentially be affected by the project. As explained in Section 3.3 of the Draft EIR, a 500-foot buffer from the edge of the project alignment and helicopter laydown areas (totaling 1,982 acres) was studied during the habitat assessment and vegetation mapping effort for the project. The areas that would actually be impacted by the project are much smaller and are characterized and quantified in the biological technical report for the project. For example, total impacts to special-status vegetation communities and land covers across the 12-mile project alignment would be approximately 7.34 acres (see Table 3.3-10 in the Draft EIR).

O-2 This comment states that artificial habitat creation, even at higher replacement ratios, does not mitigate for the loss of established habitat resources. The comment states that, even after mitigation, the proposed project would result in unavoidable, significant, adverse biological impacts to larger habitat areas and to special-status species. In order to reduce impacts to below a level of significance, the commenter states

that the scope and details of MM-BIO-9 need to be expanded to protect off-site habitat near the project. The commenter adds that the Los Angeles County Department of Regional Planning requires an approximately 1:1 habitat replacement ratio for all native habitat in the Santa Clara River watershed.

The Draft EIR contains an analysis of the project's potential to affect biological resources, including special-status species and their habitat. Potentially significant impacts were identified in the Draft EIR; as such, mitigation is required to reduce impacts to below a level of significance. The analysis in the Draft EIR determined that the identified mitigation measures would effectively reduce potentially significant impacts to below a level of significance.

In response to this comment and to comments received from CDFW (see Response to Comment Letter H) revisions have been made to MM-BIO-9. These revisions clarify that mitigation at a 1:1 ratio will be required for permanent impacts to the 13 potentially affected special-status vegetation communities and land covers, or as otherwise determined through the federal and state agency permitting process. The commenter made reference to 1:1 habitat mitigation for all native habitat in the Santa Clara River watershed as a requirement of the Los Angeles County Department of Regional Planning. However, upon review of this this comment and the referenced County requirement, no previous references or citations for such a requirement could be found. Nevertheless, MM-BIO-9 has been set forth in the EIR and would require a minimum habitat mitigation ratio of at least 1:1 for the special-status vegetation communities and land covers that would be adversely affected by the project.

O-3 This comment states that MM-BIO-9 is unenforceable. The commenter asks what agency would make decisions about how much habitat would be acquired, what qualities the habitat must possess, how far away the protected habitat can be from the project area, when the habitat would need to be acquired, what entity would manage it, and what funding source would be used for the management. The commenter asks that these topics be clarified in MM-BIO-9. The commenter further requests that MM-BIO-9 require any affected habitat that supports at least 25% cover of native vegetation to be replaced at a 1:1 per-acre off-site land preservation ratio. The commenter also requests that the language in MM-BIO-9 require provision of a long-term stewardship fund to each entity that holds the mitigation lands.

Per MM-BIO-9, as revised, the proposed project is required to mitigate for permanent impacts to the 13 affected special-status vegetation communities and land covers at a minimum of 1:1 mitigation ratio, or as otherwise determined through the federal and state agency permitting process. There is no scientific or regulatory basis for native habitat being defined by a 25% native vegetation cover standard.

LADWP would likely pursue habitat credits from an agency-approved mitigation bank or in lieu fee program for the project to mitigate for special-status vegetation communities and jurisdictional waters. Mitigation banks provide for protection and restoration of larger, more functional and longer-lasting ecological systems that have permanent protections, in the form of conservation easements, that are already in place. Mitigation banking and in lieu fee programs are considered preferable to smaller, fragmented mitigation projects by CDFW (CDFW 2019). Nevertheless, if habitat credits are not available

to meet the mitigation needs of the project, then the acquisition of off-site lands will be implemented and will proceed through the standard process required by CDFW and the U.S. Army Corps of Engineers (ACOE). This includes establishing the restrictive covenant (e.g., a conservation easement) and providing the appropriate long-term stewardship via an endowment based upon a standard Property Analysis Record (PAR) analysis. Implementation of MM-BIO-9 could therefore proceed under a variety of options for habitat conservation. Because the proposed project is in a conceptual phase of design and because the permitting details for the project are still being identified and refined, the requirements of MM-BIO-9 provide flexibility for the specific means of implementation. This flexibility ensures that the measure remains feasible and effective.

O-4 This comment requests that the language of MM-BIO-9 be expanded to require the lead agency to consult with public agencies, and that those agencies provide written assurance that they would be willing to accept fee title to, and manage in perpetuity, the lands protected under MM-BIO-9. This comment also states that language allowing purchase of habitat credits from already protected lands must be struck. The comment states that purchase of habitat credits provides no actual increased mitigation for habitat loss.

See Response O-3. In the event that habitat credits are purchased to achieve compliance with MM-BIO-9, LADWP would likely pursue habitat credits from an agency-approved mitigation bank or in lieu fee program. Mitigation banks provide for protection and restoration of larger, more functional and longer-lasting ecological systems that have permanent protections, in the form of conservation easements, that are already in place. If habitat credits are not available to meet the mitigation needs, then the acquisition of off-site lands will be implemented and will proceed through the standard process required by CDFW and ACOE.

O-5 This comment states that the Mountains Recreation and Conservation Authority may accept obligations to perform the land acquisition mitigation.

While the permitting details of the project are still being identified and refined, this suggestion will be considered as MM-BIO-9 is implemented. This comment will be included as part of the Final EIR for review and consideration by decision makers.

O-6 This comment states that the Santa Monica Mountains Conservancy urges LADWP to incorporate their recommended additions to MM-BIO-9.

A minor revision has been made to MM-BIO-9 to clarify that affected special-status vegetation communities and land covers will be mitigated at a minimum ratio of 1:1. These revisions are shown in Chapter 2 of this Final EIR and in Response H-18. As indicated in Response O-3, implementation of MM-BIO-9 effectively mitigates impacts to vegetation communities, habitats for special-status wildlife species, and occurrences of special-status plant species. This comment requests a level of detail in planning for acquisition of mitigation lands that is not feasible or necessary to specify at this stage of the project.

The more specific options for mitigation lands that are described in this comment would be considered as MM-BIO-9 is implemented. However, the specific means of implementation are currently unknown, due to the status of the project's permitting process and the status of project design. Furthermore, implementation of MM-BIO-9 through mitigation banks or an in-lieu fee program are considered to be an effective means of off-setting habitat loss. These methods are in fact considered to be preferable by some agencies (e.g., CDFW), because they provide for protection and restoration of larger, more functional and longer-lasting ecological systems that have permanent protections (CDFW 2019). Nevertheless, MM-BIO-9 still provides the flexibility for LADWP to pursue independent acquisition of off-site lands, if determined to be necessary.

O-7 This comment states that use of the helicopter laydown area within Whitney Canyon has not been vetted with the property owner (the Santa Clarita Watershed Recreation and Conservation Authority). The comment also states that a small southerly portion of work area 9-3 is within the boundaries of a riparian restoration project being undertaken by the Mountains Recreation and Conservation Authority.

The helicopter laydown areas were identified in the Draft EIR to ensure that all potential laydown areas were analyzed. However, as construction plans are refined and as LADWP coordinates further with property owners, some helicopter laydown areas may be eliminated from the project plans. As such, LADWP will coordinate with the Santa Clarita Watershed Recreation and Conservation Authority to determine the possibility of using the laydown area that was identified in Whitney Canyon.

A jurisdictional delineation was conducted for the project alignment and proposed work areas, to determine potential effects to drainages and riparian habitat. No riparian habitat has been identified within work area 9-3. However, due to the restoration efforts identified by the commenter, LADWP would coordinate with the Mountains Recreation and Conservation Authority to minimize interruptions or effects to restoration effects at that location.

References

CDFW (California Department of Fish and Wildlife). 2019. "Conservation and Mitigation Banking." Webpage. Accessed July 3, 2019. https://www.wildlife.ca.gov/Conservation/Planning/Banking.

Comment Letter A

From: Chris Moreno [mailto:chris.moreno550@gmail.com]
Sent: Thursday, May 2, 2019 10:08 PM
To: Laudeman, Kathryn
Subject: Attn: Ms. Kathryn Laudeman Comments of NOA Draft E.I. for PP 1&2 (Chris Moreno)

Hi Kathryn, my name is Chris Moreno, resident of 28359 Brookview Ter. Saugus, CA 91350

I recieved LADWP's letter of NOA of Fraft Enviromental Impact Report. Thank you for the disclosure of what is to come.

My question/ request from DWP from this new project to come is the following:

Has DWP considered, contracting with wireless carriers (Verizon, AT&T, etc.) to install cell towers on DWP's powerline towers?

The reason why I ask is because the city of Santa Clarita has lacked in getting fiber (type of internet connection) to residents. With up coming new 5G wireless networks amongst the horizon from wireless providers, this is the most likely probable solution to remedy fiber optics. DWP's powerline towers are a great and nearly perfect location for wireless carriers to install their 5G equipment.

The surrounding residents of Copper Hill and Haskel Canyon Road would greatly appreciate if DWP considered executing a contract with wireless providers so residents could be able to purchase modern internet speeds through the new 5G networks.

Residents in this area accept that DWP runs their transmission lines from Haskell Canyon switching station all the way to the Sylmar station to help distribute more power to the city of Los Angeles. By us residents accepting electrical towers running through our neighborhoods, a grateful help in aiding these residents and myself in obtaining access to faster internet speeds is a request that we would like DWP to work on.

Thank you for the letter and I hope all goes well in DWP's project in installing it's new 230kV double circuit transmission line.

Please feel free to email me back in response to the questions and requests I have brought to this email.

A-1

Chris Moreno

Comment Letter B

From: Kevin C. Kenna [mailto:kkenna@kckenterprises.com]
Sent: Monday, May 6, 2019 10:07 AM
To: Laudeman, Kathryn
Subject: Power Plant 1 and Power Plant 2 Transmission Line Conversion Project

I would like to voice my opposition to this project in its entirety. Your own analysis shows significant environmental impact which should kill it before it starts. B-1

My primary concerns are:

1) Noise levels - There will be significant noise for 9-15 hours a day? This project will see construction nearly in my back yard as the towers are only a hundred or so yards from my back door. This much noise for this length of time for this many hours a day will make my home unlivable. B-2

2) Air Quality - The air quality in my area is already bad enough without you digging things up for two years. I already have multiple filters on my house as it is. I cannot imagine how bad this project will make the air in my neighborhood or its long-tern effects on my health. B-3

3) Local Traffic - The access road for these towers runs thigh next to my property. To have heavy equipment up and down all day (and night) is simply unacceptable. The traffic we get from the filming reach is already bad enough. B-4

4) Digging Along Fault Lines - Are you completely nuts? How can this be an acceptable approach to any project? B-5

Please cancel this project immediately and find another way to get power to where you need to. B-6

Kevin C. Kenna, Owner

Comment Letter C

From: Laudeman, Kathryn
Sent: Wednesday, May 22, 2019 1:50 PM
To: 'Mike Marshall'
Cc: Parker, Nadia
Subject: RE: NOA for the Power Plan 1 and Power Plant 2 Transmission Project

Hello Mr. Marshall,

We appreciate the City of Santa Clarita's request for clarification. Please see the following answers to your questions.

1. Yes, the same alignment will be utilized and most of the new structures will be close to existing towers.
2. The height of each tower will vary based on design by our contractor. It is a good estimate that the range of tower heights will be between 100 ft. and 170 ft.
3. We are not aware of any proposed project by LADWP that was similar in scope to our project within the same transmission corridor.

I hope that the information provided can assist in any comments you may have on this project.

Thank you,

Kathryn Laudeman
213-367-6376

From: Mike Marshall [mailto:MMARSHALL@santa-clarita.com]
Sent: Tuesday, May 7, 2019 12:14 PM
To: Laudeman, Kathryn
Subject: NOA for the Power Plan 1 and Power Plant 2 Transmission Project

Ms. Laudeman,

The City of Santa Clarita appreciates you including the City in the routing of the NOA for this project. We are currently considering providing comments but before doing so we wanted to try and obtain some clarification on a couple of items if possible.

1. It appears as though approximately 63 existing 54-156 foot towers would be replaced with

C-1

63 new 100-200 foot towers within the jurisdiction of the City of Santa Clarita. It appears as though most of those replacements would be within close proximity to the existing towers. Can you confirm that this is the case?

2. Is it possible to find out the height of each of these replacement towers? Essentially, we are looking to determine which replacement towers will have potential aesthetic impacts by determining which will be taller than the existing towers.
3. Lastly, was there a similar project proposed in the past that didn't include the installation of new towers? Some staff at the City seem to recall a version of this or another project that didn't include the installation or replacement of towers and rather utilized the existing towers only.

C-1
Cont.

Any feedback you could provide would be greatly appreciated.

Thank you,

Mike Marshall
Associate Planner
City of Santa Clarita
(661) 286-4045
mmarshall@santa-clarita.com

Comment Letter D

From: E Ramquist [mailto:eramquist@gmail.com]
Sent: Tuesday, May 14, 2019 5:05 PM
To: Laudeman, Kathryn
Cc: Shea Ramquist
Subject: Concern about Environmental impact for power Plant 1 and Power Plant 2 Transmission line conversion project

Dear Ms. Kathryn Laudeman,
Our family lives near the power plant 1 and power plant 2 San Francisquito transmission lines.
We just received a letter entitled “notice of availability of draft environmental impact report”. I am writing to express my concern of the significant impacts to the environment that this project will bring to our home environment As well as potential impact to our h as well as potential impacts to our health due to alternate negative water quality and air quality.

My family and I are asking for a delay on this project and instead, investigation of a safer way to continue and improve the use of power and water.

D-1

Respectfully,
Elizabeth Ramquist

Comment Letter E

CITY OF LOS ANGELES
CALIFORNIA

Seleta J. Reynolds
GENERAL MANAGER

ERIC GARCETTI
MAYOR

DEPARTMENT OF TRANSPORTATION
6262 Van Nuys Bl.. Suite 320
Van Nuys, CA 91401
(818) 374-4699
FAX (818) 374-4696

May 14, 2019

Ms. Kathryn Laudeman, LADWP
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Subject: PROPOSED REPLACEMENT OF 115 KV SAN FRANCISQUITO PP1 AND PP2 TRANSMISSION LINE CONVERSION PROJECT

The City of Los Angeles, Department of Transportation (LADOT) has reviewed the Transportation Portion of the Draft Environmental Impact Report for the Replacement of Proposed Power Plant 1 (PP1) and Power Plant 2 (PP2) Transmission Line Conversion Project, and we have the following comments:

In the event of any partial or complete street closure are required within the City of Los Angeles in regards to this project the applicant shall prepare a temporary traffic control plan, and submit to LADOT B-Permit Section: Mike Moshksar at (213) 928-9684 or mike.moshksar@lacity.org

E-1

Please include us in any response or additional information you may have available. If you have any questions regarding this project contact Vicente Cordero at (818) 374-4697 or by e-mail at vicente.cordero@lacity.org.

Sincerely,

Vicente Cordero, P.E.
Transportation Engineer

File: sfv19-48317/transmissionpowerlines

Comment Letter F

California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources

Gavin Newsom, Governor
David Bunn, Director

June 11, 2019

Los Angeles Department of Water and Power
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, California 90012
Attn: Kathryn Laudeman
Kathryn.laudeman@ladwp.com

State Clearinghouse Number: 2018011039
Project Title: Power Plant 1 and Power Plant 2 Transmission Line Conversion Project
Document received: Draft EIR

Dear Ms. Laudeman:

The Division of Oil, Gas, and Geothermal Resources (Division) authority is set forth in Division 3 of the Public Resources Code (PRC), and Title 14 of the California Code of Regulations (CCR). PRC § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well may be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, or geothermal wells. F-1

The Division has received and reviewed the above referenced project document dated May 3, 2019. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluations.

The project is located in northern Los Angeles County, partially within the Placerita field. Our records indicate no known oil, gas, or geothermal wells will be built over or have access impeded within the project boundary as identified in the application. However, our review does indicate that six wells are located inside or within 100' of work construction/laydown areas. These wells are listed in the table below. Additionally, this project crosses though an active oilfield with numerous active and idle oil and gas wells. F-2

It is the opinion of the Division that these wells will not be built over or have future access impeded and therefore require no abandonment or reabandonment. If planned construction changes or wells are uncovered during construction, please notify this office and a follow-up well evaluation will be required.

Well	Location
Operator: George R. Urich "Burger" 1 API: 0403706209	In Stringing Pad/Laydown Yard from Fig 3.
Operator: Chevron U.S.A. Inc. "Placerita" 13 API: 0403713897	In Stringing Pad/Laydown Yard from Fig 22.
Operator: Chevron U.S.A. Inc. "Placerita" 11 API: 0403713895	In New Pole Work Area from Fig 23.
Operator: Chevron U.S.A. Inc. "Placerita" 12 API: 0403713896	Close to New Pole Work Area from Fig 23.
Operator: Chevron U.S.A. Inc. "Placerita" 14 API: 0403713898	In Stringing Pad/Laydown Yard from Fig 23.
Operator: Oro Negro, Inc. "Albert" 104 API: 0403700065	Close to New Pole Work Area and Structure Removal from Fig 24.

F-2 Cont.

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Items that can affect well access include, but are not limited to, buildings, housing, fencing, hardscape, landscape, trees, pools, patios, sidewalks, roadways, parking lots, waterways or channels, and decking. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access.

There are no guarantees a well abandoned in compliance with current Division requirements will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current standards have a lower probability of leaking in the future, however there is no guarantee that such abandonments will not leak.

F-3

The Division advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately.

Failure to plug and reabandon a well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224.

PRC § 3208.1 gives the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for reabandonment as:

1. **The property owner** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.

2. **The person or entity causing construction over or near the well** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be reabandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.

3. **The party or parties responsible for disturbing the integrity of the abandonment** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the reabandonment.

To view PRC 3208.1 in its entirety, please visit ftp://ftp.consrv.ca.gov/pub/oil/laws/PRC10.pdf

No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring written approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other abandonment or re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR §1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to

F-3
Cont.

be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

The Division makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

2. The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC § 3106, the Division has jurisdictional authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources, damage to underground oil, gas, and geothermal deposits, and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

If during development activities, any wells are encountered that were not part of this review, the Division's construction site well review engineer in the Coastal District, Ventura office is to be notified immediately, and an amended site plan with well casing diagrams for Division review shall be filed. After appropriate review, the District office will send a follow-up well evaluation letter to the property owner, applicant, and local permitting agency.

Should you have any questions, please contact Justin LaForge at (805) 465-9626 or via email at justin.laforge@conservation.ca.gov.

F-3
Cont.

Sincerely,

Patricia A. Abel
Coastal District Deputy

cc: Well Files
State Clearinghouse

Comment Letter G

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS: June 13, 2019

Kathryn.Laudeman@ladwp.com
Kathryn Laudeman, Environmental Engineering Associate
Los Angeles Department of Water and Power
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Draft Environmental Impact Report (Draft EIR) for the Proposed Power Plant 1 and Power Plant 2 Transmission Line Conversion Project (SCH No.: 2018011039)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish existing 115-kilovolt (kV) transmission lines, and construct new 230-kV double circuit transmission lines and associated transmission structures along a 12-mile alignment (Proposed Project). The Proposed Project is located on the northeast corner of Interstate 5 and Interstate 210 within the City of Santa Clarita and the community of Granada Hills-Knollwood in the City of Los Angeles. Construction of the Proposed Project will begin in 2019 and will be completed by 2023[1]. The closest sensitive receptors along the Project alignment will be within 35 feet of the work area[2].

South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be significant for NOx emissions at 407 pounds/per day (lbs/day)[3]. After the incorporation of Mitigation Measure (MM) MM-AQ-1, NOx emissions would remain significant and unavoidable[4], and cumulatively considerable[5], at 360 lbs/day[6]. MM-AQ-1 requires that off-road construction equipment greater than 75 horsepower (hp) meet Tier 3 emission standards and, when feasible, off-road construction equipment that meets Tier 4 emission standards shall be considered[7]. The Lead Agency also found that localized construction air quality impacts from PM10 at 5.10 lbs/day and PM2.5 at 3.46 lbs/day would be slightly below South Coast AQMD's localized air quality CEQA significance thresholds for PM10 and PM2.5 at 6 lbs/day and 4 lbs/day, respectively. Operational emissions are not expected to change from current baseline operations[8].

G-1

[1] Draft EIR. Section 2 Project Description. Page 2-7.
[2] *Ibid*. Page 3.2-29.
[3] *Ibid*. Page 3.2-24.
[4] *Ibid*. Page 3.2-34.
[5] *Ibid*. Pages 3.2-25 through 3.2-27.
[6] *Ibid*. Page 3.2-34.
[7] *Ibid*. 3.2-28.
[8] *Ibid*. Page

South Coast AQMD's 2016 Air Quality Management Plan

On March 3, 2017, South Coast AQMD's Governing Board adopted the 2016 AQMP[9], which was later approved by the California Air Resources Board (CARB) on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment. G-2

South Coast AQMD Staff's General Comments

As described in the 2016 AQMP, achieving NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. South Coast AQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. The Proposed Project plays an important role in contributing to additional NOx emissions during the five-year construction period. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the existing mitigation measure, MM-AQ-1 to further reduce the Proposed Project's NOx emissions and localized PM10 and PM2.5 emissions during construction. Please see the attachment for more information. G-3

South Coast AQMD Permits and Responsible Agency

It is important to note that generally, operation of portable engines and portable equipment units of 50 horsepower (hp) or greater that emit particulate matter require a permit from South Coast AQMD or registration with the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)[10]. The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if operation of construction equipment will require a South Coast AQMD permit or if it will need to be registered under the PERP through CARB[11]. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final EIR. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact the South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp. G-4

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended revision to existing MM-AQ-1 is not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091). G-5

[9] South Coast AQMD. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

[10] South Coast Air Quality Management District. *Portable Equipment Registration Program (PERP)*. Accessed at: http://www.aqmd.gov/home/permits/equipment-registration/perp.

[11] *Ibid.*

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

G-5
Cont.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS:AM
LAC190507-05
Control Number

ATTACHMENT

Recommended Revisions to existing MM-AQ-1

1. The Proposed Project will result in an unmitigated 407 lbs/day of NOx emissions during construction, of which 120 lbs/day are from off-road construction equipment and 287 lbs/day are from the use heavy-duty helicopters[12]. The Lead Agency has committed to implementing mitigation measure (MM)-AQ-1, which requires that construction equipment rated at 75 horsepower or greater during construction shall meet Tier 3 off-road emission standards. With the implementation of MM-AQ-1, off-road construction equipment NOx emissions are reduced to 73 lbs/day[13]; however, NOx emissions would remain significant and unavoidable for construction at 360 lbs/day[14], with 287 lbs/day of the emissions from the use of heavy-duty helicopters[15]. Although the primary source of construction NOx emissions on a peak day would be from the use of heavy-duty helicopters, South Coast AQMD staff recommends that the Lead Agency explore other feasible measures to further reduce the Proposed Project's construction NOx emissions through, for example, the use of Tier 4 construction equipment. This recommendation will facilitate the 2016 AQMP's goal and timeline for attaining NAAQS for ozone and ensure that the lowest emission technologies such as engines that are rated at Tier 4 off-road emissions standards or better will be used at the Proposed Project. South Coast AQMD staff recommends that the Lead Agency include the following revisions to MM-AQ-1 in the Final EIR.

   MM-AQ-1
   Use of Tier 4 ~~Tier 3~~ Equipment. The Los Angeles Department of Water and Power (LADWP) and/or its construction Contractor shall comply with the following measures during construction:

   - Prior to the start of construction activities, LADWP shall ensure that all 50 ~~75~~ horsepower or greater diesel powered equipment are powered with CARB certified Tier 4 ~~Tier 3~~ engines, except where LADWP establishes that Tier 4 ~~Tier 3~~ equipment is not available supported by substantial evidence such as data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. When feasible, zero-emission or near-zero emission or other alternatively fueled construction equipment ~~Tier 4~~ equipment shall be considered.

   - In cases where LADWP is unable to secure a piece of equipment that meets the Tier 4 ~~Tier 3~~ requirement, LADWP may upgrade another piece of equipment to compensate (i.e., a piece of Tier 4 ~~Tier 3~~ equipment would be replaced by zero-emission or near-zero emission or alternatively fueled construction equipment ~~a Tier 4~~ piece). Alternative applicable strategies may include, but would not be limited to, Tier 3 equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily helicopter trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

   - Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans. The Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors

G-6

[12] Draft EIR. Appendix C: *Air Quality and Greenhouse Gas Emissions Data*. "Total Air Quality Emissions". Page 2.
[13] *Ibid.*
[14] Draft EIR. Section 3.2 Air Quality. Page 3.2-34.
[15] *Ibid.*

to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

G-6 Cont.

Comment Letter H

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 82123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

June 14, 2019

Ms. Kathryn Laudeman
City of Los Angeles
Department of Water and Power
Environmental Planning and Assessment
111 North Hope Street, Room 1044
Los Angeles, CA 90012
Phone: 213-367-6376
Kathryn.Laudeman@ladwp.com

Subject: **Notice of a Draft Environmental Impact Report for the Power Plant 1 and Power Plant 2 Transmission Line Conversion Project, City of Los Angeles, County of Los Angeles, California**

Dear Ms. Laudeman:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Availability of a Draft Environmental Impact Report (DEIR) *for the Power Plant 1 and Power Plant 2 Transmission Line Conversion Project* (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

H-1

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; CEQA Guidelines § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish

H-2

and Game Code §1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

H-2 Cont.

Project Description and Summary

Objective: The Power Plant 1 (PP1) and Power Plant 2 (PP2) Transmission Line Conversion Project (Project) is proposed by the City of Los Angeles Department of Water and Power (LADWP). The Project will be located within a linear alignment in northwestern Los Angeles County (County) that extends from the Haskell Canyon Switching Station to the Sylmar Switching Station. The Project would involve replacing a 12-mile segment of an existing 115 kilovolt (kV) double circuit transmission line with a new 230 kV double circuit transmission line. The new 230 kV line would be strung on approximately 70 new transmission structures and approximately 7 existing structures. Of the 70 new structures, approximately 10 are expected to be lattice structures, and approximately 60 are expected to be steel monopoles. The new structures would range in height from approximately 100 feet to 200 feet. Construction is expected to take approximately 4 years to complete, beginning in 2019 and ending in 2023

Location: The proposed 230 kV line would be located within the same corridor as the existing 115 kV line. The project alignment extends from the Sylmar Switching Station in the south to the Haskell Canyon Switching Station in the north. The southern extent of the alignment is located within the Granada Hills-Knollwood Community Plan area immediately west of Interstate 5 (I-5), near the interchange of I-5 and I-210 and approximately 825 feet south-southeast of the intersection of San Fernando Road and Sepulveda Boulevard. The alignment then extends east for approximately 0.6-mile, crossing I-5 and entering the Sylmar Community Plan area within the City of Los Angeles, paralleling San Fernando Road. The alignment then angles north, crosses I-210, and extends through an industrial area in Sylmar before exiting the City of Los Angeles and extending through an undeveloped mountainous area in the San Gabriel Mountains (north of Sylmar) within the County. The portion of the alignment that crosses the San Gabriel Mountains extends between State Route 14 (SR 14) to the west and the Angeles National Forest boundary to the east is comprised of rugged, hilly terrain. Next, the alignment descends into the Santa Clara River basin and extends through the City of Santa Clarita for approximately 7 miles, crossing SR-14, Santa Clara River, and single-family residential neighborhoods and commercial areas. The alignment then extends for approximately 2 miles through the Haskell Canyon area, comprised of single-family residential neighborhoods and undeveloped hillsides, and then finally terminates just south of the Angeles National Forest at the Haskell Canyon Switching Station.

H-3

Comments and Recommendations

CDFW offers the comments and recommendations below to assist LADWP in adequately identifying, avoiding and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

H-4

Project Description and Related Impact Shortcoming

Comment #1: Impacts to Burrowing Owl (*Athene cunicularia*)

Issue 1: The Project has the potential to impact burrowing owls. However, the DEIR states focused burrowing owl breeding season surveys were not conducted. The DEIR includes

H-5

mitigation measure MM-BIO-6, which requires a preconstruction survey 14 days prior to disturbance using CDFW protocol. However, the CDFW-recommended burrowing owl protocol surveys requires a biologist conduct 4 survey visits during the breeding season: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after 15 June.

H-5 Cont.

Issue 2: MM-BIO-6 also states "if required, a burrowing owl monitoring and mitigation plan shall be prepared that outlines how passive relocation would occur and where replacement burrows would be constructed." It is unclear when this monitoring and mitigation plan would be required or who would prepare and approve the plan.

H-6

Specific impact: The Project may result in direct and indirect burrowing owl mortality or injury, the disruption of natural burrowing owl breeding behavior, and loss of breeding, wintering and foraging habitat for the species, as well as cumulative population declines and habitat loss and fragmentation. Project impacts would continue to contribute to statewide population declines for burrowing owl that have essentially been extirpated from the County, except for the Antelope Valley where it still persists in low densities and continues to experience significant direct and cumulative habitat loss.

H-7

Burrowing owl can be seasonally transient and may be hard to detect even when present. Therefore, a 14-day preconstruction survey window is likely to miss detection. Non-breeding season (September 1 to January 31) surveys may provide information on burrowing owl occupancy, but do not substitute for breeding season surveys because results are typically inconclusive.

H-8

Unmitigated impacts to burrowing owl and their habitat may place additional burden on adjacent properties to allocate resources to protect burrowing owl in the Antelope Valley should these properties be proposed for development and burrowing owl declines warrant further regulatory protection.

H-9

Why impact would occur: Protocol surveys are designed for maximizing detection of burrowing owl on the Project site for avoidance and mitigation planning purposes. A preconstruction survey may miss detection of burrowing owls using the site outside of the survey period, resulting in undisclosed impacts to this species.

H-10

Impacts to burrowing owl could result from vegetation clearing and other ground disturbing activities. Project disturbance activities may result in crushing or filling of active owl burrows causing the death or injury of adults, eggs and young. The Project will remove potential foraging habitat by eliminating native vegetation that supports essential rodent, insect and reptile populations that are prey for burrowing owl. Rodent control activities could result in direct and secondary poisoning of burrowing owl through ingesting treated rodents.

H-11

Evidence impact would be significant: Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS). Burrowing owl qualifies for enhanced consideration afforded to species under CEQA, which can be shown to meet the criteria for listing as endangered, rare or threatened (CEQA Guidelines, § 15380(d)). Adverse impacts to burrowing owl may occur without proper surveys to detect the presence or absence of this species on the Project.

H-12

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: If there is enough concern that burrowing owl may be on the Project site to warrant pre-construction surveys, breeding season protocol surveys should be conducted instead to accurately capture the use the site by burrowing owls. To reduce Project impacts to burrowing owl, we recommend that the Project conduct surveys for this species in accordance with CDFW's March 7, 2012, *Staff Report on Burrowing Owl Mitigation*. All survey efforts should be conducted as outlined in the Staff Report and the results of these surveys should be disclosed in the DEIR to allow CDFW and other interested parties opportunity to review and comment on Project impacts and mitigation proposed. Protocol surveys should be conducted prior to any Project habitat disturbance to soil, vegetation, or other sheltering habitat for burrowing owl. H-13

Mitigation Measure #2: Based on the results for the burrowing owl protocol surveys, the final CEQA document should propose avoidance measures and Project alternatives that would eliminate or reduce impacts to this species. H-14

Mitigation Measure #3: Permanent impacts to occupied burrowing owl burrows and adjacent foraging habitat should be mitigated for by setting aside replacement habitat to be protected in perpetuity under a conservation easement dedicated to a local land conservancy. CDFW recommends the LADWP require a burrowing owl mitigation plan be submitted to CDFW for review and approval prior to Project implementation. H-15

Mitigation Measure #4: Project use of rodenticides that could result in direct or secondary poisoning to burrowing owl should be avoided. H-16

Comment #2: Vegetation Mapping and Mitigation Measures

Issue 1: The DEIR states there will be a total of 7.32 acres of impacts to CDFW sensitive vegetation communities. This includes 5.02 acres of temporary direct impacts and 2.31 acres of permanent impacts to 12 special-status vegetation communities. The DEIR indicates 12.88 acres of the Project area was not included in the Project vegetation map due to the Project footprint changing. It is unclear if 12.88 acres of the Project area, which were not included in the Project vegetation map, have impacts disclosed in the DEIR. H-17

Issue 2: The Project will impact seven sensitive, non-riparian vegetation communities and nine sensitive riparian vegetation communities. MM-BIO-9 states that the riparian sensitive vegetation communities will be mitigated by acquiring off-site, generally consistent habitat, at a minimum of 1:1 ratio or through permitting requirements. It is not clear if the seven, non-riparian sensitive vegetation communities will also be mitigated at a minimum 1:1 ratio. H-18

Issue 3: MM-BIO-1 and MM-BIO-9 are included to reduce impacts to below significant for impacts to CDFW sensitive vegetation communities. MM-BIO-1 includes preconstruction surveys for rare plants, temporary fencing rare plants that are found, collecting seed from rare plants and transplanting them, salvaging 6-inches of topsoil and redistributing after construction, coordination with CDFW if a state listed plant is found. MM-BIO-9 states any sensitive vegetation communities found within a stream will be subject to CDFW Section 1600 permitting and will be mitigated at a minimum of 1:1 by purchasing habitat credit or creation. H-19

MM-BIO-1 appears to focus more on mitigating rare plant species rather than mitigating known impacts to sensitive vegetation communities. MM-BIO-9 includes a minimum 1:1 habitat preservation or creation, but only for impacts to the 1.27-acres of sensitive vegetation communities found within CDFW Section 1600 jurisdiction, which defers to obtaining future permits for specific details.

Specific impacts: CDFW considers grading a vegetation community a permanent impact unless mitigation is proposed that includes specific criteria that ensure the exact vegetation community is recreated, with consideration for the temporal loss of the habitat as well as defined success criteria and weed management. Revegetation or acquisition/preservation would be a mitigation measure proposed to offset impacts to a CDFW sensitive vegetation community. CDFW does not consider reapplying six inches of topsoil adequate mitigation to offset impacts to sensitive vegetation communities.

CDFW is concerned the Project would stockpile soil from a 12-mile long project without keeping the topsoil for each vegetation community separated.. Lumping all the vegetation communities together or using one seed mix from Haskell Canyon through Sylmar is biologically unsupported because this would mix or introduce native plant species into areas which they do not currently occur.

The Project's constant need to clear vegetation for access, fuel modification for fire safety, and other operations serves as a pathway to allow invasive plant species to become established and proliferate in areas where vegetation is graded or thinned. This, in turn, has a negative impact on the surrounding habitat.

Why impact would occur: CDFW considers vegetation communities, alliances, and associations with a statewide ranking of S1, S2, S3 and some S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21 to 80 occurrences of this community in existence in California, S2 has 6 to 20 occurrences, and S1 has less than 6 occurrences. The Project may have direct or indirect effects to these sensitive vegetation communities.

Any revegetation effort should represent the actual vegetation community being impacted. Vegetation communities are named using alliances or associations. An example is California Buckwheat Scrub Alliance. The Manual of California Vegetation (MCV) (Sawyer, et al., 2008) separates the diagnostic species for the California Buckwheat Scrub Alliance into trans and cis montane stands. The species assemblages for this one alliance change over the length of this project. CDFW is concerned spreading a generic seed mix that is not truly representative of the unique plant community alliances present will impact the existing habitat, introduce species that don't occur there, and ultimately change the structure of the vegetation community. Additionally, plants that aren't found in an area may not be suited to survive there, raising the rate of failure.

Project implementation includes grading, vegetation clearing, road construction, utilities construction, road maintenance, fuel modification, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive vegetation communities.

Evidence impact would be significant: Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a vegetation community identified by CDFW as sensitive.

H-19 Cont.

H-20

H-21

H-22

H-23

Ms. Kathryn Laudeman
City of Los Angeles
Department of Water and Power
June 14, 2019

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife resources, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (California Code of Regulations, tit. 14, § 753.5; Fish and Game Code, § 711.4; Public Resources Code, § 21089).

H-24

Conclusion

We appreciate the opportunity to comment on the project to assist LADWP in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that LADWP has to our comments and to receive notification of any forthcoming hearing date(s) for the project. Questions regarding this letter and further coordination on these issues should be directed to Kelly Schmoker-Stanphill, Senior Environmental Scientist (Specialist), at (626) 335-9092 or Kelly.schmoker@wildlife.ca.gov.

H-25

Sincerely,

FOR Erinn Wilson
Environmental Program Manager I

ec: CDFW
Victoria Tang – Los Alamitos
Kelly Schmoker-Stanphill – Glendora
Andrew Valand – Los Alamitos
Joseph Stanovich – Los Alamitos
Dolores Duarte – San Diego

Scott Morgan (State Clearinghouse)

References:

California Department of Fish and Wildlife, 2018. Updated Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Accessed at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959.

California Department of Fish and Wildlife [CDFW]. March 7, 2012. Staff Report on Burrowing Owl Mitigation (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843).

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Oberbauer, T., M. Kelly, and J. Buegge. 2008. Draft Vegetation Communities of San Diego County. March 2008. http://www.sdcanyonlands.org/pdfs/veg_comm_sdcounty_2008_doc.pdf

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Comment Letter I

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

May 31, 2019

Kathryn Laudeman, Analyst
Los Angeles Department Water and Power
Environmental Affairs
111 North Hope Street
Los Angeles, CA 90012

Dear Ms. Laudeman:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "POWER PLANT 1 AND POWER PLANT 2 TRANSMISSION LINE CONVERSION PROJECT," WOULD INVOLVE REPLACING A 12-MILE SEGMENT OF AN EXISTING 115 KILOVOLT DOUBLE CIRCUIT TRANSMISSION LINE WITH A NEW 230 KILOVOLT DOUBLE CIRCUIT TRANSMISSION LINE, IT WOULD ALSO INVOLVE DEMOLISHING THE EXISTING LINE, SANTA CLARITA, FFER 201900046

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. I-1

The following are their comments:

PLANNING DIVISION:

We have no comments. I-2

For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or Kien.Chin@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed the project will not have a significant impact to the Fire Department's Land Development Unit.

The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

For any questions regarding the report, please contact Inspector Joseph Youman at (323) 890-4125 or Joseph.Youman@fire.lacounty.gov.

I-3

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

I-4

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

I-5

Very truly yours,

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

Comment Letter J

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
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www.dot.ca.gov

Making Conservation a California Way of Life.

June 5, 2019

Mr. Charles Holloway
City of Los Angeles
Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

RE: Power Plant 1 and Power Plant 2
Transmission Line Conversion Project –
Draft Environmental Impact Report (DEIR)
SCH # 2018011039
GTS # 07-LA-2019-02455
Vic. LA-5/PM: R 43.658 –
LA-126/PM: 6.036

Dear Mr. Charles Holloway:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project's DEIR. The proposed project would involve replacing a 12-mile segment of an existing 115 kilovolt (kV) double circuit transmission line with a new 230 kV double circuit transmission line (hereafter referred to as the "115 kV line" and the "230 kV line," respectively). The new 230 kV line would be strung with two 230-kV 3 phase circuits; however, only one circuit would be energized upon project completion. The second would be energized in the future, based on availability of future renewable energy supplies. The proposed project would involve demolishing the existing 115 kV line and constructing an approximately 12-mile segment of 230 kV lines and associated transmission structures generally adjacent to the existing 115 kV line.

J-1

After reviewing the DEIR, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2019-02455

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief
cc. Scott Morgan, State Clearing House

Comment Letter K

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

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metro.net

Metro

June 17, 2019

Kathryn Laudeman
City of Los Angeles Department of Water and Power
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, CA 90012
Sent by Email: Kathryn.laudeman@ladwp.com

RE: Power Plant 1 and Power 2 Transmission Line Conversion Project:
Draft Environmental Impact Report – Metro Comments

Dear Ms. Laudeman:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Power Plant 1 and Power 2 Transmission Line Conversion (Project) located in Los Angeles County (County). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods.

The purpose of this letter is to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to Metrolink facilities and services, which may be affected by the Project. In addition to the specific comments outlined below, Metro would like to provide the Project Sponsor with two resources: 1) the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW) and 2) the Adjacent Construction Manual with technical information (also attached). These documents and additional resources are available at www.metro.net/projects/devreview/. K-1

Project Description

The Project is located over or adjacent to Metrolink services and includes replacing a 12-mile segment of an existing 115 kilovolt (kV) double circuit transmission line (115 kV line) with a new 230 kV double circuit transmission line (230 kV line). Project would involve demolishing the existing 115 kV line and constructing an approximately 12-mile segment of 230 kV lines and associated transmissions structures generally adjacent to the existing 115 kV line. The 115kV line and most of its associated transmission towers would be removed from Haskell Canyon Switching Station in the north to the line's terminus at Olive Switching Station in the south. The new line would be installed and the old line would be removed within an existing alignment that extends form Haskell Canyon Switching Station in the north to Olive Switching Station. The circuit that would not be energized would terminate at Olive Switching Station, and the energized circuit would terminate at Sylmar Switching Station. The project K-2

alignment is approximately 12 miles long and consists of LADWP-owned land and private properties within an LADWP right-of-way. The purpose of the project is to increase the transmission capacity between Haskell Canyon Switching Station and Sylmar Switching Station so that additional renewable energy supplies can be transmitted from the Tehachapi Mountains and Mojave Desert to the Los Angeles basin. K-2 Cont.

Comments

Metrolink Adjacency

1. Operations: The Project's alignment intersects Metro-owned ROW operated and maintained by the Southern California Regional Rail Authority (SCRRA) to run the Metrolink commuter rail service at two locations: 1) The Old Road and CA-14; 2) CA-5 and CA-210. Union Pacific Railroad freight trains also operate on this line. The Project Sponsor is advised that rail service operates in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW adjacent to the Project. K-3

2. Structure Setback: Where the Project is immediately adjacent to Metrolink ROW (owned by Metro), all structures as part of the Project should be set back five a minimum of five (5) feet from property line to allow adequate space for property maintenance. Property owners will not be permitted to access Metrolink ROW to maintain private development. Any access to railroad property is strictly at the discretion of Metro and Metrolink. Where feasible, fencing and walls at or near property lines shall be maintained from the private property side. K-4

3. ROW Access: There shall be no encroachment onto the railroad ROW. Any future work performed on the Project's structures or property requiring access to or over the railroad ROW, shall be covered by specific Right-of-Entry temporary access permits with specific requirements. SCRRA should be contacted for these Right-of Entry requirements. Information can be found on their website at www.metrolinktrains.com. Other requirements may include permits for construction of structures, overhead lines and any future repairs, including the use of overhead cranes or any other equipment that could potentially impact railroad operations and safety. K-5

4. Construction Monitoring: Metro and/or SCRRA staff shall be permitted to monitor construction activity to ascertain any impact to the ROW. During construction, a protection barrier shall be constructed to prevent objects, material, or debris from falling onto the ROW. The Project Sponsor will be required to notify Metro and SCRRA of any changes to the construction/building plans that may or may not impact the ROW. K-6

5. Metro Overhead Crossing: Metro Real Estate requires license agreements for the two overhead crossing transmission lines if agreements do not already exist. Site specific drawings are also requested to determine if the Los Angeles Department Water and Power already has licenses for the two crossings. K-7

If you have any questions regarding this response, please contact me by phone at 213-922-2671, by email at LingS@metro.net, or by mail at the following address:

K-8

Metro Development Review
One Gateway Plaza MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,

Shine Ling, AICP
Manager, Transit Oriented Communities

cc: Ron Mathieu, SCRRA

Attachments and links:

- Adjacent Construction Design Manual
- Adjacent Development Handbook: https://www.metro.net/projects/devreview/
- Metrolink Right of Way Encroachment Procedures: https://www.metrolinktrains.com

Comment Letter L

From: Administration Gabrieleno [mailto:admin@gabrielenoindians.org]
Sent: Monday, June 17, 2019 12:44 PM
To: Laudeman, Kathryn
Subject: [EXTERNAL] POWER PLANT 1 AND POWER PLANT 2 TRANSMISSION LINE CONVERSION

Dear Ms. Kathryn Laudeman,

Thank you for your letter dated May 3,2019. If there will be any type of ground disturbance taking place regarding the above project our Tribal government would like to consult with you.
Thank you. L-1

Sincerely,

Brandy Salas

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org

Attachments area

Comment Letter M

From: Ed Gerlits [mailto:EGERLITS@dpw.lacounty.gov]
Sent: Wednesday, June 19, 2019 1:55 PM
To: Laudeman, Kathryn
Cc: Jose Suarez
Subject: [EXTERNAL] Draft EIR - Power Plant 1 and 2 Transmission Line Conversion Project

June 19, 2019

Los Angeles Department of Water and Power
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, CA 90012
Attn: Ms. Kathryn Laudeman

Dear Ms. Laudeman,

POWER PLANT 1 AND 2 TRANSMISSION LINE CONVERSION PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT

Thank you for the opportunity to review the Draft Environmental Impact Report for the subject project. The project involves replacing a 12-mile segment of an existing transmission line from 115kV to 230kV between Haskell Canyon Switching Station and Sylmar Switching Station.

The following comments from Los Angeles County Public Works are for your consideration:

1. A portion of the proposed project is within Bouquet Canyon and LACFCD owns and maintains significant amounts of stormwater infrastructure in the area. Please identify in the EIR where the towers will be placed and how they will affect LACFCD regarding road closures for the installation of the towers and power lines.

M-1

2. January 2018 Initial Study, Pages 61-62, Section 3.9(h): Although the environmental impacts may be less than significant, the project proponent is proposing new locations for the replacement transmission towers. During the project's permit processes, the project proponent is still required to demonstrate that the proposed project elements will not increase flood levels in floodplains. M-2

3. January 2018 Initial Study, Pages 61-62, Section 3.9(i): Any construction within 100-year (1% annual chance) floodplains will require compliance with the requirements of Title 44 of the Code of Federal Regulations (44 CFR), Part 60.3. Furthermore, any construction in Los Angeles County unincorporated areas will require compliance with the requirements of Los Angeles County Code Title 20, Section 20.94.040. In addition, for any construction within the property or rights of way of the County of Los Angeles and the Los Angeles County Flood Control District, the County of Los Angeles will also require compliance with the requirements of 44 CFR Part 60.3 and Los Angeles County Code Title 20, Sections 20.94.030 and 20.94.040. For further information, please contact Ms. Patricia Wood at (626) 458-6131 or pwood@pw.lacounty.gov. M-3

We request the opportunity to review the future environmental document when it is available. If you have any questions or require additional information, please contact Mr. Jose Suarez of Public Works, Land Development Division at (626) 458-4921 or jsuarez@dpw.lacounty.gov. M-4

Ed Gerlits, P.E.
Associate Civil Engineer
Los Angeles County Public Works
Office: (626) 458-4953

SOURCE: Esri Basemaps

LA DWP Los Angeles Department of Water & Power

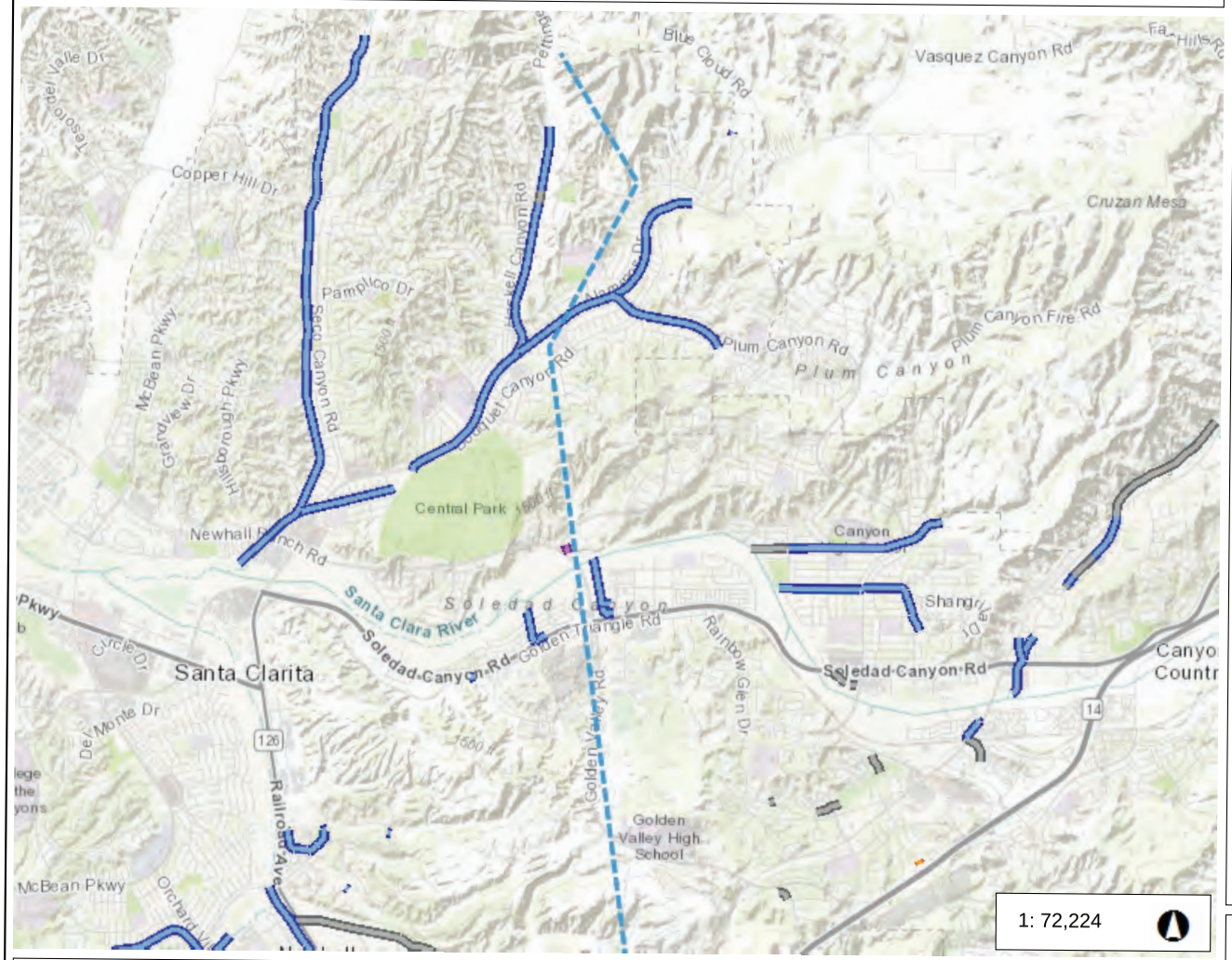
0 2.5 5 Miles

FIGURE 2-1

Regional Map

PP1 and PP2 Transmission Line Conversion Project

Los Angeles County Department of Public Works



Legend

- Parcel
- Channels Maintained by LACF
- Channels Maintained by City
- Channels Maintained by Army
- Channels Maintained by Caltra
- Channels Maintenance Unkno
- LA County Boundary

Notes

2.28 Miles 0 2.28 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
THIS MAP IS NOT TO BE USED FOR NAVIGATION

Comment Letter N

OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF

June 20, 2019

Ms. Kathryn Laudeman
Los Angeles Department of Water and Power
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, California 90012

Dear Ms. Laudeman:

REVIEW COMMENTS
NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL IMPACT REPORT
POWER PLANT 1 AND POWER PLANT 2
TRANSMISSION LINE CONVERSION PROJECT

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the May 2019 Notice of Availability of a Draft Environmental Impact Report (Draft EIR) for the Power Plant 1 and Power Plant 2 Transmission Line Conversion Project (Project). The Project is a transmission line replacement proposed by Los Angeles Department of Water and Power. It would involve replacing a 12-mile segment of an existing 115 kilovolt (kV) double circuit transmission line with a new 230 kV double circuit transmission line for the purpose of increasing the transmission capacity between Haskell Canyon and Sylmar Switching Stations so that additional renewable energy supplies can be transmitted to the Los Angeles basin.

N-1

The proposed Project would be located within a linear alignment in northwestern Los Angeles County that generally extends from Haskell Canyon in the community of Sylmar, located south of the City of Santa Clarita. The proposed Project is within the service area of the Department's Santa Clarita Valley Station (Station). Accordingly, the Station reviewed the Draft EIR and provided the attached review comments (see correspondence, dated June 14, 2019, from Captain Robert J. Lewis).

Also, for future reference, the Department provides the following updated contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Maynora G. Castro, Departmental Facilities Planner II
MGCastro@lasd.org

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Maynora Castro of my staff, at (323) 526-5578.

Sincerely,

ALEX VILLANUEVA, SHERIFF

Tracey Jue, Director
Facilities Planning Bureau

N-1
Cont.

SH-AD-32A (8/17)

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service Since 1850"

DATE: June 14, 2019
FILE NO:

OFFICE CORRESPONDENCE

FROM: ROBERT J. LEWIS, CAPTAIN
SANTA CLARITA VALLEY
STATION

TO: TRACEY JUE, DIRECTOR
FACILITIES PLANNING
BUREAU

SUBJECT: REVIEW COMMENTS ON THE NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE POWER PLANT 1 AND POWER PLANT 2 TRANSMISSION LINE CONVERSION PROJECT

The Santa Clarita Valley Sheriff's Station (Station) reviewed the May 2019 Notice of Availability (NOA) of a Draft Environmental Impact Report (Draft EIR) for the Power Plant 1 and Power Plant 2 Transmission Line Conversion Project (Project). The proposed Project, by Los Angeles Department of Water and Power (LADWP), would be located within a linear alignment in northwestern Los Angeles County that generally extends from Haskell Canyon to the community of Sylmar, located south of the City of Santa Clarita. The proposed Project would involve replacing a 12-mile segment of an existing 115 kilovolt (kV) double circuit transmission line with a new 230 kV double circuit transmission line. The proposed Project alignment consists of LADWP-owned land and private properties within an LADWP right-of-way. (IS Section 1.1 Project Overview)

The proposed Project would not alter population in the Project area, therefore would not substantially alter service ratios, response times, or other performance objectives to the extent that new or expanded police protection facilities, equipment, or staff would be required. Therefore, no impacts would occur, as previously concluded in the Initial Study.

N-2

Section 3.8 of the Draft EIR, Transportation and Traffic, indicates that issues pertaining to traffic safety hazards, emergency access, public transit, pedestrians, and bicycles were previously discussed and analyzed during the Initial Study and determined to be less than significant. It is also stated that any road closures would be coordinated with Caltrans, or the applicable local jurisdictions, and access for emergency vehicles would be ensured throughout construction. The Station does not dispute any of these

N-3

conclusions and statements and has no further comment at this time. However, the Station reserves the right to amend or supplement our assessment upon subsequent reviews of the proposed Project.

N-3 Cont.

Thank you for including the Station in the environmental review process for the proposed Project. Should you have any questions regarding this matter, please contact Operations Lieutenant Justin Diez at (661) 799-5102.

RJL:JRD

Comment Letter O

STATE OF CALIFORNIA–THE NATURAL RESOURCES AGENCY GAVIN NEWSOM, *Governor*

SANTA MONICA MOUNTAINS CONSERVANCY
RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV

June 24, 2019

Los Angeles Department of Water and Power
Attention: Kathryn Laudeman
111 North Hope Street, Room 1044
Los Angeles, California 90012

Power Plant 1 and Power Plant 2 Transmission Line Conversion Project
Draft Enviromental Impact Report Comments
SCH No. 2018011039

Dear Ms. Laudeman:

The Santa Monica Mountains Conservancy offers the following comments on the above referenced 14-mile-long transmission line conversion project that courses through two sections of the Angeles National Forest and through protected open space owned by the City of Santa Clarita, the Mountains Recreation and Conservation Authority, and the Santa Clarita Watershed Recreation and Conservation Authority. The project courses through miles of habitat in the core habitat areas of both the San Gabriel and Sierra Pelona Mountains and crosses the Santa Clara River. Over a thousand acres are subject to either permanent or temporary biological impacts. The Draft Environmental Impact Report (DEIR) is deficient for not addressing how integral the lands in the subject power line corridor are to large regional ecosystems. The lines and their access roads course through thousands of acres of protected core habitat area. O-1

All but one of the DEIR biological mitigation measures fall into a category of mitigation that provides a last minute count of what life forms are going to be killed, that last minute warn the species of their habitat's fate pre-disturbance, and then loosely state how there would be artificial burrows and roosts, temporal ponds, and sapling trees installed in unknown locations with loose long term oversight to compensate for both widespread permanent and temporal impacts.

Few objective biologists would agree that artificial habitat creation, even at higher replacement ratios, truly mitigates for the loss of established habitat resources that are perfectly adapted to their micro sites. The bottom line is that every project permanently reduces the carrying capacity of southern California's mountain ranges regardless of the mitigation. The subject project has the potential to adversely impact over half a dozen special-status plant species and over dozen special-status wildlife species. Even with mitigation measure MM-BIO-9 that calls for some offsite habitat protection, the proposed project would result in unavoidable significant O-2

adverse biological impacts to larger habitat areas and most probably to special-status species. To reduce those impacts to a level less than significant, the scope and details of mitigation measure MM-BIO-9 must be substantially expanded to guarantee the timely protection of scores of acres of offsite habitat near the proposed project. The Los Angeles County Department of Regional Planning now requires an approximately 1:1 habitat replacement ratio for all destroyed native habitat in the Santa Clara River watershed. The precedent is there and working.

O-2 Cont.

Mitigation measure MM-BIO-9 Habitat Preservation and/or Creation states in part:

> To mitigate for impacts to vegetation communities, habitats for special-status wildlife species and occurrences of special-status plant species, suitable off-site mitigation land shall be acquired. LADWP shall purchase habitat credit or provide for the conservation of habitat generally consistent with the assemblage of vegetation communities impacted by the project.

As written this mitigation measure is unenforceable in a manner that guarantees any level of actual habitat loss mitigation. What agency makes the decisions about how much habitat must be acquired, what qualities it must possess, how far from the impact area can it be, when must it be acquired, and what entity will manage it with what funding source?

O-3

The Conservancy urges the Department to flush out the answers to all of these above questions in a much more robust writing of MM-BIO-9 in the Final EIR. At a minimum, the new language should explicitly state that any habitat that is disturbed that supports at least 25 percent cover of native vegetation must be replaced at a 1:1 per-acre offsite land preservation ratio. In addition that fee simple land protection must be 100 percent complete prior to any ground disturbance. If the final project completion disturbance footprint exceeds the habitat disturbance acreage in the FEIR, then the replacement ratios must also be increased commensurately. The mitigation measure language must also require that the lead agency provide a long term stewardship fund to each entity that holds said mitigation lands. The minimum long term stewardship fund for each non-contiguous cluster of parcels should not be less than $100,000. Those funds must be paid upon transfer of the fee title.

The language must also be expanded to require the lead agency to consult with public agencies and provide written assurances from such agencies that they are willing to accept fee title to, and manage in perpetuity, said new protected lands. If the LADWP decides to hold the lands in perpetuity, then local government agencies should be offered conservation easements accompanied by easement processing funds and a minimum $15,000 per parcel, one time,

O-4

easement monitoring payment. The language allowing purchase of habitat credits from already protected lands must be struck. Such payments provide no actual increased mitigation for habitat loss. O-4 Cont.

If the LADWP does not desire to perform the land acquisition mitigation itself, there is a strong possibility that the Mountains Recreation and Conservation Authority (MRCA) would accept such obligations if adequately funded. The MRCA is an approved mitigation entity by CDFW. In addition, the Conservancy and MRCA collectively have an ACOE approved in lieu fee mitigation instrument. O-5

The Conservancy urges the Department to incorporate these basic but substantive additions to MM-BIO-9 to demonstrate its commitment to natural lands and watersheds in southern California. O-6

Upon consultation with the Santa Clarita Watershed Recreation and Conservation Authority staff, the shown helicopter lay down area in Whitney Canyon has not be vetted with the agency to date. In addition a small southerly portion of the Whitney Canyon lay down area 9-3 is within a riparian restoration project boundary being conducted by the MRCA. O-7

Please direct questions and future documents to Paul Edelman of our staff at the above letterhead address, at edelman@smmc.ca.gov, and 310-589-3200 ext. 128.

Sincerely,

IRMA MUÑOZ
Chairperson

4 MITIGATION MONITORING AND REPORTING PROGRAM

Section 21081.6 of the Public Resources Code requires that, upon certification of an EIR, "the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation." The lead agency must define specific reporting and/or monitoring requirements to be enforced during project implementation prior to final approval of the proposed project.

The mitigation monitoring and reporting program (MMRP) for the proposed project, contained in this chapter, provides for monitoring of the mitigation measures required upon certification of this EIR. LADWP, as lead agency for the proposed project, is responsible for administering and implementing the MMRP. The MMRP stipulates how all required mitigation measures are to be implemented and completed during the appropriate project phase. It also facilitates documentation necessary to verify that mitigation measures were properly implemented.

The mitigation measures provided in this MMRP were initially identified in the Draft EIR. Some revisions to mitigation have been made as a result of the comments received during public review of the Draft EIR (see Chapter 2 of this Final EIR); however, no new mitigation measures have been added.

The remainder of this MMRP consists of a table (Table 4-1) that identifies the mitigation measures by resource area. Table 4-1 identifies the mitigation monitoring and reporting requirements, including the timing for implementation (prior to, during, or after construction), and the responsible monitoring agency. Space is provided for sign-off following completion/implementation of each mitigation measure.

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
Agriculture and Forestry Resources						
MM-AG-1	Construction activities occurring within farmland that is designated by the Farmland Mapping and Monitoring Program as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, shall adhere to the following specifications: prior to grading or site disturbance, topsoil within the impact areas shall be salvaged and stockpiled (salvage depths shall be determined by a qualified professional). The stockpiled soils shall be covered by an anchored tarp or watered down until the site is ready for the soil to be replaced. Once construction activities are completed, the salvaged topsoil shall be replaced.	Prior to and during construction occurring within designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland	Los Angeles Department of Water and Power (LADWP)			
Air Quality						
MM-AQ-1	Use of Tier 4 Portable Equipment. The Los Angeles Department of Water and Power (LADWP) and/or its construction contractor shall comply with the following measures during construction: • Prior to the start of construction activities, LADWP shall ensure that all 50 horsepower or greater diesel-powered portable equipment are powered with CARB certified Tier 4 engines, except where LADWP establishes that Tier 4 portable equipment is not available supported by substantial evidence such as data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. When feasible, zero-emission or near-zero emission or other alternatively fueled construction equipment shall be considered. • In cases where LADWP is unable to secure a piece of portable equipment that meets the Tier 4 engine	Prior to and during construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	requirement, LADWP may upgrade another piece of portable equipment to compensate (i.e., a piece of Tier 4 equipment would be replaced by zero-emission or near-zero emission or alternatively fueled construction equipment). Alternative applicable strategies may include, but would not be limited to, Tier 3 portable equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily helicopter trips to and from the project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable. • Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans and shall be included in applicable bid documents. Successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. Additionally, LADWP shall require periodic reporting and provision of written documentation by contractors to ensure compliance. LADWP shall also conduct regular inspections to the maximum extent feasible to ensure compliance. • Note: "Portable" is defined as being designed and capable of being carried or moved from one location to another. Indication of portability includes, but not limited to, wheels, skids, carrying handles, dolly, trailer, or platform. The equipment is not considered portable if the equipment is attached to a foundation or if it resides in a location for more than 12 consecutive months. This definition is referenced in the California Air Resources Board's Regulation to Establish a Statewide Portable Equipment Registration Program in Section 2452(dd).					

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
Biological Resources						
MM-BIO-1	Pre-Construction Surveys and Avoidance and Minimization Measures for Special-Status Plants Pre-Construction Special-Status Plant Surveys. To mitigate for potential impacts to habitat occupied by special-status plant species (if any), surveys shall be conducted within impact areas where special-status plant species have a moderate potential to occur. (Such surveys are only necessary in impact areas that were not surveyed in 2017 and 2018. See Table 12 for a list of the specific locations where focused surveys for special-status plant species are required.) These focused surveys shall occur during the season prior to construction and shall be conducted during a period when the target species would be observable and identifiable (e.g., blooming period for annuals). Focused surveys for special-status plant species shall be conducted by a qualified biologist according to: the *CNPS Botanical Survey Guidelines* (CNPS 2001); *Protocols for Surveying and Evaluating Impacts to Special Status Native Populations and Natural Communities* (CDFG 2009); and *U.S. Fish and Wildlife Service General Rare Plant Survey Guidelines* (Cypher 2002). Avoidance and Minimization Measures. If special-status plant species are detected during focused survey efforts described above, the full extent of the occurrence within the area shall be recorded. The location of each special-status plant occurrence shall be mapped and number of individuals for each occurrence documented. If impacts to special-status plants cannot be avoided, the following	This measure was completed subsequent to the release of the Draft EIR. The required surveys determined that no potentially significant impacts would occur to special-status plants; as such, no further activities are required per MM-BIO-1.				

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	measures shall be implemented: 1. Special-status plants in the vicinity of the disturbance will be temporarily fenced or prominently flagged and a buffer established around the populations to prevent inadvertent encroachment by vehicles and equipment during the activity; 2. Seeds will be collected and stored in appropriate storage conditions (e.g., cool and dry), and dispersed/transplanted following the construction activity and reapplication of salvaged topsoil; and 3. The top 6 inches of topsoil will be salvaged, stockpiled, and replaced as soon as practicable after project completion. Soil stockpiles shall be stabilized, consistent with the project's Stormwater Pollution Prevention Plan. The salvaged topsoil shall be redistributed depth and contoured to blend with surrounding grades. In the event that a federally or state-listed plant is observed during focused survey, the Los Angeles Department of Water and Power (LADWP) shall consult with the applicable agency (i.e., CDFW and/or USFWS) and obtain written concurrence for measures required for federally or state-listed plant species, if observed.					
MM-BIO-2	Biological Monitoring, Avoidance, and Fencing Biological Monitoring. To prevent disturbance to areas outside the limits of disturbance, all clearing and grubbing activities within habitats potentially suitable to support special-status biological resources (i.e., waterways, disturbed land, coastal scrub, chaparral, non-native grassland, riparian, and woodland habitats) shall be	Prior to and during construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	monitored by a qualified biologist. Biological monitoring shall include the following: 1. Attend the preconstruction meeting with the contractor and other key construction personnel prior to clearing, grubbing, or grading to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds). 2. Conduct an environmental training with the construction personnel outlining the biological avoidance and mitigation measures. 3. Conduct meetings with the contractor and other key construction personnel describing the importance of restricting work to designated areas prior to clearing, grubbing, or grading. Perform regular inspection of fencing and erosion control measures (daily during rain events, if safe). 4. Discuss procedures/training for minimizing harm to or harassment of wildlife encountered during construction with the contractor and other key construction personnel prior to clearing, grubbing, or grading. 5. Conduct pre-construction sweeps in areas with suitable habitat to support special-status biological resources (i.e., waterways, disturbed land, coastal scrub, chaparral, non-native grassland, riparian, and woodland habitats). Supervise and conduct regular spot checks during vegetation clearing, grubbing, and grading, as well as conduct monitoring in areas determined to have potential to support special-status species (as determined by a qualified biologist) to ensure against direct and indirect					

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	impacts to biological resources that are intended to be protected and preserved. 6. Flush species (i.e., avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities during pre-construction sweeps. 7. If special-status species (e.g., western spadefoot, California glossy snake, Blainville's horned lizard, San Diegan tiger whiptail, and/or silvery legless lizard,) are detected in the work area, a biologist possessing an appropriate California scientific collecting permit to handle special-status species will capture and relocate individuals to nearby undisturbed areas with suitable habitat outside of the construction area, but as close to their origin as possible. All wildlife moved during project activities shall be documented by the biologist on site. 8. Verify that the construction contractor Qualified Storm Water Practitioner (QSP) is implementing the stormwater pollution prevention plan (SWPPP) best management practices (BMPs) and maintaining physical BMPs, as well as the stormwater management practices for protection of biological resources outlined in MM-BIO-3. 9. Periodically monitor the construction site to see that dust is minimized. If the biological monitor determines that dust is adversely affecting special-status species, the monitor shall require the construction personnel to implement best available control measures to reduce dust. Examples of such best available control measures include periodic watering of work areas, application of environmentally safe soil stabilization materials, and/or					

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	roll compaction. 10. Periodically monitor the construction site to verify that artificial security light fixtures are directed away from open space and are shielded. 11. At the end of each workday, any open holes (including large/steep excavations) shall be inspected by the on-site biologist and subsequently fully covered with steel plates, plywood, or other effective coverings to prevent entrapment of wildlife species. If fully covering the excavations is impractical, ramps will be used to provide a means of escape for wildlife that enter the excavations, or open holes will be securely fenced with exclusion fencing. If common wildlife species are found in a hole, the biological monitor shall immediately be informed and the animal(s) shall be removed. If the animal(s) is/are a sensitive species that require(s) special handling authorization, a qualified biologist (agency-permitted or approved to handle a specific species) shall remove the animal before resuming work in that immediate area. The applicant shall specify the requirement to cover all open holes, create ramps, or install exclusion fencing around open holes in its agreements with all construction contractors. Temporary Construction Fencing. To prevent inadvertent disturbance to sensitive vegetation and species adjacent to the proposed project area, temporary fencing and/or staking shall be installed prior to construction activities around the perimeter of the work areas, as feasible with topography and large vegetation. The fencing shall be placed to protect from inadvertent disturbance outside of the limits of grading as well as to prevent unauthorized access into the work areas.					

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	Construction activities would be conducted in a manner to avoid jurisdictional waters to the maximum extent practicable.					
MM-BIO-3	Stormwater Management for Biological Resources Protection. Prior to proposed project construction, the Los Angeles Department of Water and Power (LADWP) or its construction contractor will develop a Stormwater Pollution Prevention Plan (SWPPP) in accordance with State Water Resources Control Board permitting requirements. In addition, the following measures and/or restrictions will be incorporated into the project for the protection of biological resources from stormwater-related effects and noted on construction plans to avoid impacts to special-status species, sensitive vegetation communities, and/or jurisdictional waters during construction. The biologist shall verify the implementation of the following design requirements: 1. No planting or seeding of invasive plant species (per the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the project region) shall be permitted. Any equipment or vehicles driven and/or operated within jurisdictional waters of the United States/state shall be checked and maintained by the operator daily to prevent leaks of oil or other petroleum products that could be deleterious to aquatic life if introduced to the watercourse. No equipment maintenance or storage shall be performed within 200 feet of jurisdictional waters of the United States/state where petroleum products or other pollutants from the equipment may enter these areas.	Prior to and during construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	2. Littering shall be prohibited and trash shall be removed from construction areas and contained in established covered receptacles. All food-related trash and garbage shall be removed from the construction sites.					
MM-BIO-4	Fire Risk Management Plan. A Fire Risk Management Plan shall be developed and implemented in accordance with MM-HAZ-1. To protect special-status resources (including special-status vegetation communities) from fire risk, annual maintenance of fuel modification zones shall also be conducted and revegetation shall be conducted with acceptable locally indigenous plants. All personnel shall be advised of their responsibility under the applicable fire laws and regulations, including precautions and implementation of practical measures to report and suppress fires during construction.	Prior to and during construction; operation	LADWP			
MM-BIO-5	Nesting Bird Survey. This measure is provided to protect nesting special-status species and more common species protected under the Migratory Bird Treaty Act, which prohibits the "take" of any migratory bird or any part, nest, or eggs of any such bird. The Migratory Bird Treaty Act applies to over 800 species of birds, including rare and common species. Burrowing owl is addressed separately in a species-specific biological resource protection measure (MM-BIO-6). If construction activity occurs during the nesting season (typically February 1 through August 31), a biological survey for nesting bird species shall be conducted within a 300-foot buffer (or a 500-foot buffer for raptors) of the proposed work area. This survey shall occur within 72 hours prior to construction at the particular work area. Pre-	Prior to construction and during construction (in the event that nesting birds are identified)	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	construction nesting surveys are necessary to assure avoidance of impacts to nesting raptors (e.g., Cooper's hawk (*Accipiter cooperii*) and red-tailed hawk (*Buteo jamaicensis*)) and/or birds protected by the federal Migratory Bird Treaty Act. If any active nests are detected, the area shall be flagged and mapped with a minimum of a 25-foot buffer and up to a maximum of 500 feet for raptors, as determined by the project biologist, and shall be avoided until the nesting cycle is complete. If construction-related activities that are excessively noisy (e.g., clearing, grading, grubbing, or prolonged helicopter use) occur during the period of February 1 through August 31, and nesting CAGN (or other listed birds including LBVI) and/or raptors are detected by the biologist, the biologist shall have the authority to establish protections for the nesting bird(s) and/or raptor(s) based on the biology of the species. Such protections may include: noise from construction activity is kept below 60 A-weighted decibels equivalent continuous sound level (dBA L_{eq}) or preconstruction ambient noise levels, whichever is greater; no-disturbance buffers are established around the nest; temporary sound walls are set up between the nest and the construction work area; observation of the birds for signs of disturbance and ceasing activity in the event that disturbance is observed.					
MM-BIO-6	Burrowing Owl Mitigation and Monitoring Plan. If burrowing owl are detected during pre-construction surveys, the Los Angeles Department of Water and Power shall prepare a burrowing owl monitoring and mitigation plan that outlines efforts that will avoid or minimize impacts to the species. The monitoring and mitigation plan will include nest/burrow no	Prior to construction and during construction (in the event that burrowing owl are	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	intrusion buffer establishment by season; artificial burrow construction, placement, and maintenance design and measures; work site management practices (such as restrictions on rodenticide use); and how passive relocation would occur. The monitoring and mitigation plan will be submitted to the California Department of Fish and Wildlife (CDFW) for review and approval 10 days prior to the commencement of ground-disturbing activities. Burrowing Owl Preconstruction Surveys. No less than 14 days prior to ground-disturbing activities (vegetation clearance, grading), a qualified wildlife biologist (i.e., a wildlife biologist with previous burrowing owl survey experience) shall conduct pre-construction take avoidance surveys on and within 200 meters (656 feet) of the construction zone within areas of suitable habitat for burrowing owl (i.e., disturbed land, grassland, upland mustard, chamise/annual grass-forb, and unvegetated channels) to identify occupied breeding or wintering burrowing owl burrows. The take avoidance burrowing owl surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (2012 Staff Report; CDFG 2012). Burrows with fresh burrowing owl sign or presence of burrowing owls will be documented. Areas deemed to be unsuitable burrowing owl habitat based on vegetation communities and results of the burrowing owl habitat assessment will be excluded from these surveys. An additional survey will be conducted within 24 hours of actual ground disturbance. Burrowing Owl Nest/Burrow Buffers. If burrowing owls are	identified)				

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	detected on site, no ground-disturbing activities shall be permitted within 200 meters (656 feet) of an occupied burrow during the breeding season (February 1 to August 31), unless otherwise allowed by CDFW. During the nonbreeding season (September 1 to January 31), ground-disturbing work can proceed near active burrows as long as the work occurs no closer than 50 meters (165 feet) from the burrow. Depending on the level of disturbance, a smaller buffer may be established in consultation with CDFW. If work must occur within 50 meters of the occupied burrow, then artificial burrows will be constructed in accordance with the monitoring and mitigation plan to provide the owl an option if they choose to vacate the burrow. Burrows will not be closed unless it is determined that the owls may be in direct danger of mortality due to crushing or entrenchment. Burrowing Owl Artificial Burrows and Passive Relocation. If avoidance of active burrows is infeasible during the nonbreeding season, then, before breeding behavior is exhibited and after the burrow is confirmed empty by site surveillance and/or scoping, a qualified biologist shall implement a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). Passive relocation consists of excluding burrowing owls from occupied burrows and providing suitable artificial burrows nearby for the excluded burrowing owls.					
MM-BIO-7	Coastal California Gnatcatcher Surveys. To mitigate for potential impacts to occupied habitat by coastal California gnatcatcher, focused surveys shall be conducted in suitable	This measure was completed subsequent to the release of the Draft EIR. The required surveys were negative; as such, no further activities are required per MM-BIO-7.				

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	habitat prior to construction within the temporary and permanent impact footprints that were not surveyed in 2018 (see Table 13 and *2018 Focused California Gnatcatcher Survey Report for the Los Angeles Department of Water and Power (LADWP) Power Plant 1 and Power Plant 2 Transmission Line Conversion Project, Los Angeles County, California* (Dudek 2018)). The focused surveys shall be performed according to the currently accepted USFWS protocol. The proposed project occurs outside of a Natural Communities Conservation Plan (NCCP) enrolled area, therefore, the focused surveys shall include six survey passes at a minimum of 7-day intervals between visits during the breeding season (March 15 through June 30). (If performed outside the breeding season, then nine surveys performed at minimum 14-day intervals may be performed according to protocol.) In accordance with the protocol, no more than 80 acres of suitable habitat shall be surveyed by a single permitted biologist during each site visit conducted. If focused surveys are negative, no additional mitigation is required. If focused surveys are positive, informal consultation with USFWS shall occur. If required by USFWS, an incidental take permit (ITP) shall be obtained. Occupied habitat shall be mitigated at a minimum 1:1 ratio for temporary impacts, 2:1 ratio for permanent impacts, or as specified by the USFWS (e.g., within an ITP or as a result of informal consultation). Avoidance and minimization measures shall be implemented in accordance with USFWS specifications or as negotiated with the USFWS through informal consultation and shall include, at a minimum:					

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	1. Environmental awareness training for all construction personnel to educate personnel about coastal California gnatcatcher, protective status avoidance measures to be implemented by all personnel, including the avoidance of nesting bird season to the greatest extent feasible and minimization of vegetation impacts within suitable coastal scrub habitat; 2. Removal of suitable coastal scrub vegetation shall only occur outside of the coastal California gnatcatcher breeding season (so, only between September 1 and February 14); 3. Establishment of environmentally sensitive areas around coastal California gnatcatcher nest locations (500 foot avoidance buffer or as otherwise allowed by USFWS) by a qualified biologist prior to the start of any ground- or vegetation-disturbing activities, which shall be maintained and avoided during construction activities and until the nest is determined by a qualified biologist to no longer be active; and 4. Presence of a qualified biological monitor during initial grading activities, adjacent to environmentally sensitive areas, near active nest locations, and as needed to document compliance with USFWS specifications, the biological monitor will have the authority to stop work as needed to avoid direct impacts to coastal California gnatcatcher.					
MM-BIO-8	Roosting Bats. No less than 30 days prior to commencement of construction activities for each construction area with suitable habitat (i.e., rocky outcrops, cliffs with crevices, man-made structures, and trees within grassland, chaparral, coastal scrub, and woodland habitats) to support special-status roosting bats	Prior to and during construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	(i.e., pallid bat, spotted bat, and western mastiff bat), a pre-construction survey shall be conducted by a qualified biologist to determine whether active roosts of special-status bats (i.e., maternity roosts, non-maternity roosts, and winter hibernacula) are present in the construction disturbance zone or within 300 feet of the project disturbance zone boundary. If roosts are detected during pre-construction surveys, the following avoidance measures shall be implemented unless relocation and/or take is authorized under applicable law. 1. If an active maternity roost is identified, the maternity roost shall not be directly disturbed, and some construction activities, such as mass-grading or other activities involving heavy equipment, within 300 feet of the maternity roost may be postponed or halted until the maternity roost is vacated and juveniles have fledged, as determined by the qualified biologist. The rearing season for native bat species in California is approximately April 1 through August 31. 2. If non-breeding bat roosts (hibernacula or non-maternity roosts) are found within the disturbance zone, the individuals shall be safely evicted, under the direction of the qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the project biologist (e.g., installation of one-way doors). If flushing species from tree or rock roosts is required, this shall be done when temperatures are sufficiently warm for bats to exit the roost, because bats do not					

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	typically leave their roost daily during winter months. In situations requiring one-way doors, a minimum of 1 week shall pass after doors are installed and temperatures should be sufficiently warm (for winter hibernacula) for bats to exit the roost. This action should allow all bats to leave during the course of one 1 week. If a roost needs to be removed and the qualified biologist determines that the use of one-way doors is not necessary, the roost shall first be disturbed following the direction of the qualified biologist at dusk to allow bats to escape during the darker hours. Once the bats escape, the roost site shall be removed or the construction disturbance shall occur the next day (i.e., there shall be no less or more than 1 night between initial disturbance and the roost removal).					
MM-BIO-9	Habitat Preservation and/or Creation. To mitigate for permanent impacts to vegetation communities, habitats for special-status wildlife species and occurrences of special-status plant species, suitable off-site mitigation land shall be acquired. LADWP shall purchase habitat credit through an agency approved mitigation bank or in lieu fee program that provides for the conservation of habitat generally consistent with the assemblage of vegetation communities impacted by the project and at a minimum of 1:1 mitigation ratio. The proposed project shall mitigate for permanent impacts to jurisdictional waters, including riparian habitat, at a minimum of 1:1 mitigation ratio, or as otherwise determined through the federal and state agency permitting process. Mitigation for permanent impacts to jurisdictional waters would be through the reestablishment, rehabilitation, enhancement, or	Prior to and during construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	preservation of jurisdictional waters through an agency approved mitigation bank or in lieu fee program or through permittee-responsible mitigation as defined by the ACOE. To avoid and minimize temporary impacts to special-status habitats and any special-status biological resources that may be present within, temporary impact areas (including staging laydown areas, stringing pads, temporary access routes, and temporary work pads) shall be sited to avoid these habitats to the maximum extent practicable.					
MM-BIO-10	Protected Tree Inventory. To mitigate for potential impacts to protected trees, a protected tree inventory shall be conducted within the temporary and permanent impact footprints, including a 200-foot buffer to account for indirect impacts, prior to construction. The inventory shall be performed by International Society of Arboriculture (ISA) certified arborists qualified to perform a protected tree assessment within Los Angeles County, City of Los Angeles, and City of Santa Clarita. The arborist(s) shall conduct a physical inventory, collecting tree location and arboricultural attribute information for each tree within the potential impact areas the meets the minimum size requirements, as defined within the County of Los Angeles Protected Tree Ordinance, City of Los Angeles Protected Trees, and City of Santa Clarita Oak Tree Ordinance. A Protected Tree Report, including impacts and mitigation (as applicable to each local ordinance) shall be prepared. Permit applications, if applicable, shall be submitted prior to construction to the applicable jurisdiction (Los Angeles County, City of Los Angeles, and/or City of Santa Clarita). Permits must be approved prior to construction.	Prior to construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	Cultural Resources					
MM-CUL-1	Avoidance and Minimization. Presence/absence testing shall be conducted within planned work areas that overlap with sensitive archaeological sites as delineated in Confidential Appendix D of the Cultural Resources Assessment. Prior to construction, a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualification Standards) in coordination with the Los Angeles Department of Water and Power (LADWP) or its construction contractor shall review the final construction plans to determine which work areas require presence/absence testing. Based on conceptual project design, presence/absence testing shall be conducted within the areas of planned construction near archaeological sites P-19-003131, P-19-004720, and LADWP-001. The planned areas of construction that are located within or near each of these sites are listed below. • P-19-003131: Lay Down Area 1-4, Stringing Pad 1-6, Structure Removals 10A1, 10A2, and 10A3, and New Pole Work Areas 1-4, 1-5, 1-6, 1-7, and 1-8 • P-19-004720: Lay Down Area 3-2, Stringing Pad 3-3, New Pole Work Area 3-3, and Structure Removals 12A1 and 12A2 • LADWP-001: New Pole Work Area 4-2 and Structure Removal 12A7 In the event that presence/absence testing reveals the presence of cultural material within planned work areas, a qualified archaeologist shall determine the significance of the find and determine whether or not additional study is warranted. If the find is determined to be significant, the	Prior to construction and during construction, in the event that significant resources are identified	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	qualified archaeologist shall coordinate with LADWP or its construction contractor to reduce and/or avoid effects to such materials. Impacts could be reduced or avoided through one or more of the following means: redesigning the planned construction work area to avoid the resource, establishing construction exclusion fencing around the archaeologically sensitive area to ensure that construction equipment and workers do not inadvertently enter the sensitive area, preparing an archeological treatment plan for the resource, and/or data recovery.					
MM-CUL-2	Construction Monitoring. Construction monitoring shall be conducted at locations where planned construction work areas overlap or are situated adjacent to a sensitive archaeological site, as delineated in Confidential Appendix D of the Cultural Resources Assessment. Prior to construction, a qualified archaeologist, in coordination with LADWP or its construction contractor, shall review the final construction plans to determine which work areas require archaeological monitoring. The archaeological monitoring shall be conducted during all ground disturbance at the identified locations. Based on conceptual project design, the work area locations where construction monitoring is expected to be warranted are listed below. • New Pole Work Areas 1-4, 1-5, 1-6, 1-7, 1-8, 3-3, 4-2, and 8-3; Structure Removals 10A1, 10A2, 10A3, 12A1, 12A2, 12A7, 16A7, and 19A4; Lay Down Areas 1-4 and 3-2; and, Stringing Pads 1-6 and 3-3 In the event that cultural materials are found during construction monitoring, the monitor shall adhere to the protocol for unanticipated discoveries set forth in MM-CUL-3.	Prior to and during construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	In the event that the find could consist of or include human remains, the archaeological monitor and construction personnel shall follow the protocol for unanticipated finds of human remains set forth in MM-CUL-4.					
MM-CUL-3	Unanticipated Discoveries. If archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); California Public Resources Code, Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, may be warranted.	Construction	LADWP			
MM-CUL-4	Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with	Construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition of the human remains.					
MM-CUL-5	Prior to commencement of any grading activity on-site, LADWP shall retain a qualified paleontologist. The qualified paleontologist shall attend the preconstruction meeting and prepare a mitigation plan that outlines monitoring protocols to be followed during all rough grading and other significant ground-disturbing activities in geological units with high paleontological sensitivity. These units include previously undisturbed older surficial gravels and alluvium, Saugus Formation, Pico Formation, Towsley Formation, Castaic Formation, and Mint Canyon Formation. Paleontological monitoring shall not be required for excavations into rock units with no to low paleontological sensitivity, including Cretaceous or older metamorphic rocks, Holocene surficial sediments, previously disturbed deposits, or artificial fill. Paleontological monitoring shall be conducted by a qualified paleontological monitor. A qualified paleontological monitor is defined as having (equivalent experience acceptable as appropriate): "A BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate	Prior to and during construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring…" (SVP 2010). In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 25-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. If sedimentological indicators conducive to the preservation of microvertebrates (as defined by SVP [2010]) are encountered, test sediment samples shall be collected to determine the presence of microvertebrate fossils. Following the paleontological monitoring program, a final report detailing the monitoring activities and any fossil specimens recovered, along with associated geological and paleontological data, shall be prepared.					
		Geology and Soils				
MM-GEO-1	Slope Stability Analysis. Prior to final design and construction, the Los Angeles Department of Water and Power shall complete a geotechnical investigation along the project alignment, including an analysis of potential slope instability associated with cut-and-fill grading. The analysis shall be completed by a California Certified Engineering Geologist and licensed Geotechnical Engineer. In the event that the analysis indicates that potential slope instability could occur as a result of grading, remedial measures (e.g., buttress slopes) shall be included in the grading plans in	Prior to final design and construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	order to prevent slope failure. All cut and fill slopes shall be designed and constructed in accordance with California Building Code (Sections 1804 and 1804A) specifications.					
	Hazards and Hazardous Materials					
MM-HAZ-1	Prior to construction, the Los Angeles Department of Water and Power shall develop a Fire Risk Management Plan that addresses training of construction crews and provides details of fire suppression and reporting procedures and equipment to be maintained on site during construction. The Los Angeles Department of Water and Power or its construction contractor shall monitor construction activities to ensure implementation and effectiveness of the Fire Risk Management Plan. The final plan shall be implemented during all construction activities. At minimum, the plan will include the following: • Requirements for workers to park away from dry vegetation. • Requirements for flammable materials to be properly handled and stored. • Procedures for minimizing potential ignition, including, but not limited to, helicopter operations, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions. • Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days. • Detailed information for reporting started or observed fires to appropriate fire agencies. • Worker training for fire prevention, initial attack	Prior to and during construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	firefighting, and fire reporting. • Emergency communication, response, and reporting procedures. • Coordination with local fire agencies to facilitate emergency access to the project alignment, if necessary. • Emergency contact information. • Requirements for fire-suppression equipment and materials to be kept in vehicles and adjacent to all work areas and staging areas and to be clearly marked. • Requirements for all vehicles to carry fire suppression equipment.					
	Noise					
MM-NOI-1	Construction Noise Reduction. The Los Angeles Department of Water and Power and/or its construction contractor shall comply with the following measures during construction: 1. For construction activities within the City of Los Angeles, construction activities shall not occur between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturdays, or on Sundays or national holidays. For construction activities within the City of Santa Clarita, construction activities shall not occur between the hours of 7:00 p.m. and 7:00 a.m., Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturdays, or on Sundays or the following public holidays: New Year's Day, Independence Day, Thanksgiving, Christmas Day, Memorial Day, and Labor Day. In the event that construction is required to extend beyond these times, extended hours permits shall be required. 2. Equipment (e.g., portable generators) shall be shielded	Prior to and during construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	from sensitive uses using local temporary noise barriers or enclosures, or shall otherwise be designed or configured to minimize noise at nearby noise-sensitive receptors. 3. Staging of construction equipment shall not occur within 50 feet of any noise- or vibration-sensitive land uses. 4. All noise-producing equipment and vehicles using internal combustion engines shall be equipped with mufflers; air-inlet silencers, where appropriate; and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment. 5. All mobile or fixed noise-producing equipment used for the project that are regulated for noise output by a local, state, or federal agency shall comply with such regulations. 6. Idling equipment shall be kept to a minimum and moved as far as practicable from noise-sensitive land uses. 7. Electrically powered equipment shall be used instead of pneumatic or internal-combustion-powered equipment, where feasible. 8. Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors. 9. The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. 10. Notice will be provided via mail, door hangers, or other					

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	means prior to construction to properties within approximately 500 feet of work areas where helicopter-aided construction will occur. The announcement will state where and when construction is expected to occur in the area. The announcement will also identify a public liaison person that can be contacted for construction-related noise concerns. Any complaints will be logged and investigated to facilitate resolution of the issue of concern as feasible					
	Tribal Cultural Resources					
MM-TCR-1	Construction Monitoring. A Native American monitor shall be present to accompany archaeologists during any necessary archaeological fieldwork (such as survey, test excavations, data recovery) that may be required, and to observe initial ground disturbance during construction, including clearing/grubbing, grading, excavation, trenching, and auguring. (1) The Los Angeles Department of Water and Power (LADWP) will provide the archaeologist and the interested Tribe(s) with a weekly construction schedule identifying all ground disturbing activities within the monitoring area. (2) The Native American Monitor shall photo-document ground disturbing activities and maintain a daily monitoring log that contains descriptions of the daily construction activities, locations with diagrams, soils, and documentation of tribal cultural resources identified. The monitoring log and photo documentation, accompanied by a photo key, shall be submitted to LADWP upon completion of the aforementioned earthwork activity.	Construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	(3) In the event that Native American cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find (MM-TCR-4). If the unanticipated resource is archaeological in nature, appropriate management requirements shall be implemented as outlined in MM-CUL-1. The archaeologist and Tribal monitor will have the authority to request ground disturbing activities cease within the area of a discovery. Work on the other portions of the project outside of the buffered area may continue during this assessment period. (4) A sufficient number of archaeological and Tribal monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.					
MM-TCR-2	Pre-Construction Meeting. Prior to project implementation, a pre-construction meeting shall be held with Los Angeles Department of Water and Power and field personnel, the archaeologist, and Tribal Representative(s). This meeting shall outline all processes for monitoring on the project, review the laws protecting cultural resources, and discuss specific cultural concerns associated with the project area.	Prior to construction	LADWP			
MM-TCR-3	Human Remains. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code shall be enforced for the duration of the project.	Construction	LADWP			

Table 4-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	(1) Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the NAHC, should those findings be determined as Native American in origin.					
MM-TCR-4	Cultural Resources Treatment Plan. If significant Native American cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, a qualified archaeologist shall be retained to develop an cultural resources Treatment Plan, the drafts of which shall be provided to the interested Tribe(s) for review and comment. (1) All in-field investigations, assessments, and/or data recovery enacted pursuant to the finalized Treatment Plan shall be monitored by a Native American monitor. (2) LADWP shall, in good faith, consult with the interested Tribe(s) on the disposition and treatment of any artifacts or other cultural materials encountered during the project.	During construction	LADWP			

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ATTACHMENT A

Biological Survey Reports

ATTACHMENT A1

Focused California Gnatcatcher Survey Report

38 NORTH MARENGO AVENUE
PASADENA, CALIFORNIA 91101
T 626.204.9800 F 626.204.9834

July 17, 2019 10649.19-09

U.S. Fish and Wildlife Service
Attn: Recovery Permit Coordinator
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

Subject: *2019 Focused California Gnatcatcher Survey 45-Day Report for the Los Angeles Department of Water and Power (LADWP) Power Plant 1 and Power Plant 2 Transmission Line Conversion Project, Los Angeles County, California*

Dear Recovery Permit Coordinator:

This report documents the method and results of protocol-level presence/absence surveys conducted for the coastal California gnatcatcher (*Polioptila californica californica*; CAGN). Focused surveys were conducted throughout all areas of suitable habitat for the proposed Los Angeles Department of Water and Power (LADWP) Power Plant 1 and Power Plant 2 Transmission Line Conversion Project alignment (project). This project spans from Haskell Canyon in the northwest portion of Los Angeles County south to the neighborhood of Sylmar in the City of Los Angeles (Attachment A - Figures 1A through 1D). In 2018, CAGN surveys were performed for the entire length of the project (Dudek 2018). Due to updated project design features (i.e., proposed helicopter landing sites along the transmission corridor to be used during construction), 2019 CAGN surveys were performed for those areas that were not previously surveyed in 2018.

The proposed helicopter landing sites plus 500-foot buffers around the features resulted in a total of approximately 122 acres of land not previously surveyed. As shown in Figures 1A through 1D, the 122 acres are dispersed across six CAGN survey areas with Survey Area 1 and 2 in the north (Figure 1B), Survey Area 3 in and near Whitney Canyon Park (Figure 1C), and Survey Areas 4 through 6 in the south (Figure 1D). Of these 122 acres, approximately 45 acres were considered suitable habitat for CAGN (e.g., California sagebrush scrub, California buckwheat scrub, black sage scrub, purple sage scrub, brittle bush scrub alliance and associations). Dudek biologists Melissa Blundell (TE97717A) and Tommy Molioo (Authorized Individual under Brock Ortega, TE#813545-8.1) conducted CAGN surveys from May through July 2019.

The CAGN is federally-listed as threatened and a California Department of Fish and Wildlife (CDFW) Species of Special Concern. It is closely associated with coastal sage scrub habitat and typically occurs below 950 feet elevation and on slopes less than 40% (Atwood 1990), but CAGN have also been observed at elevations greater than 2,000 feet. The species is primarily threatened by loss, degradation, and fragmentation of coastal sage scrub habitat, and is also impacted by brown-headed cowbird (*Molothrus ater*) nest parasitism (Braden et al. 1997).

LOCATION AND EXISTING CONDITIONS

The updated project design features are located along the LADWP Power Plant 1 and Power Plant 2 Transmission Line Conversion Project alignment (project site) in the northwestern portion of Los Angeles County, California, on portions of, Oat Mountain, San Fernando, and Newhall 7.5 minute USGS quadrangles. A total of six survey areas were

included during 2019 CAGN surveys (Figures 1A through 1D). Survey Area 1 and 2 (Figure 1B) are located south of Bouquet Canyon Road, bordered by residential developments, solar facilities, and natural landscapes. Survey Area 3 (Figure 1C) is located adjacent to and within Whitney Canyon Park and LADWP facilities, which is mostly composed of open space, trails, and access roads. Survey Area 4 (Figure 1D) is located directly east of the junction of State Route-14 and Interstate-5 (I-5), within LADWP solar facilities. This survey area consists mostly of solar facilities, natural hillsides, and access roads. Survey Area 5 and 6 (Figure 1D) are located directly east of I-5 and north of Nicklaus Drive, accessed though LADWP facilities and consist of open space, access roads, and disturbed areas. The project survey areas are located in Sections 6, 7, 18, 19, Township 3 North, and Range 15 West; Sections 13 and 24, Township 3 North, and Range 16 West; and Sections 12 and 13, Township 4 North, and Range 16 West.

Overall, flat upland areas, as well as hilly and slightly mountainous areas characterize the project site, with elevations varying from approximately 1,382 feet above mean sea level (AMSL) to 1,750 feet AMSL. Surrounding land uses include a combination of residential, open spaces, natural lands, solar facilities, and LADWP facilities. Major highways are located to the west of the southern survey areas.

Fourteen soil types, listed below, are mapped within the survey area (USDA NRCS 2019). The majority of the soils mapped within the survey areas are loam, loamy sand, and sandy loam soils. Silty clay loam soils also occur within smaller sections of the survey areas.

- Badland
- Balcom silty clay loam, 30–50% slopes
- Capistrano-Urban land complex, 2–9% slopes
- Castaic-Balcom silty clay loams-15 to 30% slopes
- Ojai loam, 2–9% slopes
- Ojai loam 15–30% slopes
- Ojai loam 30–50% slopes
- Rock outcrop-Friant complex, 50–75% slopes
- Saugus loam, 30–50% slopes
- Saugus loam, 30–50% slopes, eroded
- Vista coarse sandy loam, 30–50% slopes
- Xerothents-Urban land-Saugus complex, 15–30% slopes
- Yolo loam, 0–2% slopes
- Yolo loam, 2–9% slopes

VEGETATION COMMUNITIES

The survey areas includes a variety of native and non-native upland vegetation communities and developed areas. Twenty-four vegetation communities and land covers were identified within the survey areas, which are shown in Attachment A - Figures 2A through 2E and summarized in Table 1. Ten of these vegetation communities were identified as potentially suitable CAGN habitat within the survey areas (Table 1). Suitable CAGN habitat within the survey areas includes brittle bush scrub, buckwheat scrub, California sagebrush scrub (alliances and associations), chamise-black sage associations, and laurel sumac scrub alliance. Suitable CAGN habitat within the survey areas are described in detail below.

Table 1 Vegetation Communities and Land Covers within the Survey Area

Vegetation Community	Map Code	Survey Area (acres)
CAGN Suitable Upland Shrubland Alliances and Associations		
Brittle Bush Scrub Alliance	ENCFAR	6.86
California Buckwheat Scrub Alliance	ERIFASFOL	1.30
California Sagebrush Scrub Alliance	ARTCAL	10.48
California Sagebrush-Black Sage Association	ARTCAL-SALMEL	8.01
California Sagebrush-California Buckwheat Alliance	ARTCAL-ERIFAS	3.62
California Sagebrush-Laurel Sumac Association	ARTCAL-MALLAU	4.33
Chamise-Black Sage Association	ADEFAS-SALMEL	0.09
Laurel Sumac Scrub Alliance	MALLAU	10.36
Subtotal CAGN Suitable Upland Shrubland Alliances and Stands		*45.05*[a]
Upland Shrubland Alliances and Associations (Non-Suitable CAGN Habitat)		
Chamise Chaparral Alliance	ADEFAS	15.49
Brittle Brush Scrub Alliance (Distrubed)	dENCFAR	1.07
Hoary Leaf Ceanothus Chaparral Alliance	CEACRA	5.75
Scrub Oak Chaparral Alliance	QUEBER	0.15
Subtotal Upland Shrubland Alliances and Associations (Non-Suitable CAGN Habitat)		*22.46*[a]
Upland Forest Alliances, Associations, and Groves		
Coast Live Oak Woodland Alliance	QUEAGR	1.60
Subtotal Upland Forest Alliances and Stands		*1.60*[a]
Riparian Forest and Woodland Alliances and Associations		
Fremont Cottonwood/Mulefat Association	POPFRE-BACSAL	0.57
Subtotal Riparian Forest and Woodland Alliances and Stands		*0.57*[a]
Riparian Thickets and Shrubland Alliances		
Black Willow Thickets Alliance	SALGOO	0.51
Blue Elderberry Shrubland Alliance	SAMNIG	0.33

Table 1 Vegetation Communities and Land Covers within the Survey Area

Vegetation Community	Map Code	Survey Area (acres)
Mulefat Thickets Alliance	BACSAL	1.14
Subtotal Riparian Thickets Alliances		*1.98*[a]
Non-Natural Land Covers/Unvegetated Communities		
Disturbed Habitat	DH	19.85
Mediterranean California Naturalized Annual and Perennial Grassland	NNG	8.72
Open Water	OW	0.08
Parks and Ornamental Plantings	ORN	0.79
Urban/Developed	DEV	21.10
Unvegetated Channel	UVC	0.06
Subtotal Non-Natural Land Covers/Unvegetated Communities		*50.61*[a]
Total		**122.26**[a]

[a] Totals may not sum due to rounding.

Brittle Bush Scrub Alliance

Brittle bush scrub includes brittlebush (*Encelia farinosa*) as the dominant shrub in the canopy. This alliance has an open to intermittent cover within the shrub canopy less than 2 meters (7 feet) and an open ground layer with seasonal annuals (Sawyer et al. 2009). Other species include an herbaceous layer comprise of slender oat (*Avena barbata*), ripgut brome (*Bromus diandrus*), red brome (*Bromus madritensis* ssp. *rubens*), and shortpod mustard (*Hirschfeldia incana*). Brittle bush scrub occurs in a small patch in Survey Area 1 (Figure 2A) and throughout Survey Area 6 (Figure 2E). A narrow band of disturbed brittle brush is located between the railroad and SR-14 west of Survey Area 5 (Figure 2D); due to its location, disturbed characteristics, and steep terrain (over 40% slopes) this area was not considered suitable.

California Buckwheat Scrub Alliance

California buckwheat scrub includes California buckwheat (*Eriogonum fasciculatum*) as the dominant or co-dominant shrub in the canopy. This alliance has a continuous to intermittent shrub canopy less than 2 meters (7 feet) in height with a variable ground layer. Other species present at lower cover include blue elderberry (*Sambucus nigra* ssp. *caerulea*), California sagebrush, scrub oak (*Quercus berberidifolia*), purple sage (*Salvia leucophylla*), ripgut brome, red brome, bluedicks (*Dichelostemma capitatum*), mouse barley (*Hordeum murinum*), and redstem stork's bill. A patch of California buckwheat scrub is located in the northern boundary of Survey Area 5 (Figure 2D) and in the center of Survey Area 6 (Figure 2E).

California Sagebrush Scrub Alliance

California sagebrush scrub includes California sagebrush (*Artemisia californica*) as the dominant or co-dominant shrub in the canopy. This alliance has a continuous to intermittent shrub canopy less than 2 meters (7 feet) in

height with a variable ground layer (Sawyer et al. 2009). Other species present at low cover include purple sage, blue elderberry, holly leaf cherry (*Prunus ilicifolia* ssp. *ilicifolia*), ripgut brome, and red brome. Patches of California sagebrush scrub (and associations) are located throughout Survey Area 1, 3, and 5 (Figures 2A, 2B, and 2D).

Three associations of the California sagebrush scrub alliance occur within the survey area: California sagebrush-black sage association (*Artemisia californica-Salvia mellifera* association), California sagebrush-purple sage association (*Artemisia californica-Salvia leucophylla* association), and California sagebrush-laurel sumac association. California sagebrush-laurel sumac association is not recognized by Manual of California Vegetation (Sawyer et al. 2009) or CDFW (2018).

California Sagebrush-Black Sage Association

The California sagebrush-black sage association is characterized as having California sagebrush and black sage co-dominant in the shrub layer. Other species present at a lower cover include chamise, ripgut brome, and red brome. California sagebrush-black sage scrub occurs in Survey Area 4 and 5 (Figure 2C and 2D).

California Sagebrush-Laurel Sumac Association

Within the study area, the California sagebrush-laurel sumac association is characterized as having California sagebrush and laurel sumac as the co-dominant species in the shrub layer. California sagebrush-laurel sumac association occurs in Survey Area 4 (Figure 2D).

California Sagebrush-California Buckwheat Scrub Alliance

The California sagebrush-California buckwheat scrub alliance includes California sagebrush and California buckwheat as the co-dominant shrubs in the canopy. This alliance has a two-tiered continuous to intermittent shrub canopy with most shrubs less than 2 meters (7 feet) in height and a seasonally present herbaceous layer (Sawyer et al. 2009). A small patch of California sagebrush-California buckwheat occurs in the western edge and along a trail in Survey Area 3 (Figure 2B) and southern part of Survey Area 5 (Figure 2D).

Chamise Chaparral Alliance

Chamise chaparral includes chamise (*Adenostoma fasciculatum*) as the dominant or co-dominant shrub in the canopy. This alliance has an intermittent to continuous shrub canopy less than 4 meters (13 feet) in height with a sparse to intermittent herbaceous layer (Sawyer et al. 2009).

One associations within the chamise chaparral alliance occurs within the survey area: Chamise-black sage association (*Adenostoma fasciculatum-Salvia mellifera* association).

Chamise-Black Sage Association

The chamise-black sage association on-site is characterized as having chamise and black sage co-dominant in the shrub layer. Other species present at a lower cover include California sagebrush, blue elderberry, and shortpod mustard. A small sliver of chamise-black sage is located in the very northwest portion of Survey Area 6 (Figure 2E).

METHODS

The presence/absence focused survey for CAGN was conducted for the project between May 2 and June 27, 2019. The survey was conducted within weather conditions and time frames appropriate for the detection of gnatcatchers. Weather conditions and survey dates are provided below in Table 2. Survey routes are shown in Attachment A - Figures 3A through 3E. The survey routes focused on moderate to high quality habitat, but also encroached into lower quality habitat areas due to close proximity to suitable habitat areas and the presence of coastal sage scrub associated species. It should also be noted that portions of the southern survey areas (i.e., Survey Areas 3 through 6) pass through USFWS Designated Critical Habitat (Unit 13) for this species.

Table 2 Survey Dates and Conditions

Survey Pass[1]	Date	Time	Personnel[2]	Temperature[3]
1	5/02/2019	0640–1040	MB	48–60°F; 0–3 mph; 10–40% cc
2	5/23/2019	0600-1200	TM	54-65°F; 0-1 mph; 80% cc
3	5/30/2019	0600–1150	MB	57-78°F; 0–3 mph; 0% cc
4	6/06/2019	0600-1155	TM	60-75°F; 0-2 mph; 10% cc
5	6/13/2019	0600–1202	MB	60–74°F; 0–4 mph; 0–100% cc
-	6/20/2019	0747–1055	MB	66°F; 0–3 mph; 100% cc
6	6/27/2019	0618–1147	MB	62–75°F; 0–2 mph; 0–10% cc

1 **Survey Pass**: Due to initial access, Survey Pass 1 included three of the total six survey areas. The three survey areas that were not initially included in Survey Pass 1 were surveyed on 6/20/2019 so that each survey area received a total of six survey passes.
2 **Personnel:** MB = Melissa Blundell; TM = Tommy Molioo
3 **Survey Conditions:** °F = degrees Fahrenheit; cc = cloud cover; mph = miles per hour

The survey was conducted following the currently accepted protocol of the U.S. Fish and Wildlife Service (USFWS), *Coastal California Gnatcatcher* (*Polioptila californica californica*) *Presence/Absence Survey Protocol* (USFWS 1997). The survey areas occurs outside of a Natural Communities Conservation Plan (NCCP) enrolled area; therefore, the CAGN focused survey included six survey passes at a minimum of 7-day intervals between visits during the breeding season (March 15 through June 30). In accordance with the protocol, no more than 80 acres of suitable habitat were surveyed by a single permitted biologist during each site visit conducted. Survey routes completely covered all areas of suitable CAGN habitat within the survey areas and allowed for complete audible and visual coverage of all suitable CAGN habitat on site.

A 200-scale topographic map (1 inch = 200 feet) overlain with vegetation polygons and the survey area was utilized during the survey. Additionally, digital mobile maps were utilized during the surveys to assist in navigating each survey area. Appropriate binoculars (e.g., 8x42 through 10x50 magnification) were used to aid in detecting and identifying bird species. A recording of gnatcatcher vocalizations was played approximately every 50–100 feet to induce responses from potentially present gnatcatchers. Vocalization-playback would have been terminated immediately upon detection of any gnatcatchers to minimize the potential for harassment.

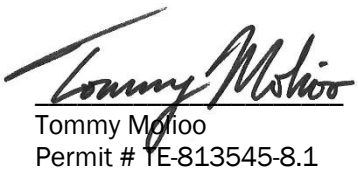
RESULTS

No CAGN (i.e., individuals and/or nests) were detected within the LADWP Power Plant 1 and Power Plant 2 Transmission Line Conversion Project survey areas in 2019. Therefore, these areas are currently considered absent of CAGN. A full list of bird species observed during the survey and within proximity of the survey area is provided in Attachment B.

We certify that the information in this survey report and attached exhibits fully and accurately represent our work.

Sincerely,

Melissa Blundell
Permit #TE-97717A



Tommy Molioo
Permit # TE-813545-8.1

Att: A, Figures 1A through 1D, Project Location
Figures 2A through 2E, Vegetation Communities
Figures 3A through 3E, CAGN Survey Routes
B, Compendium of Wildlife Species Observed or Detected

cc: Eric Wilson, Dudek
Nadia Parker, LADWP

REFERENCES

Atwood, J. L. 1990. *Status review of the California gnatcatcher (Polioptila californica*). Unpublished technical report Manomet Bird Observatory, Manomet, Massachusetts. 79pp.

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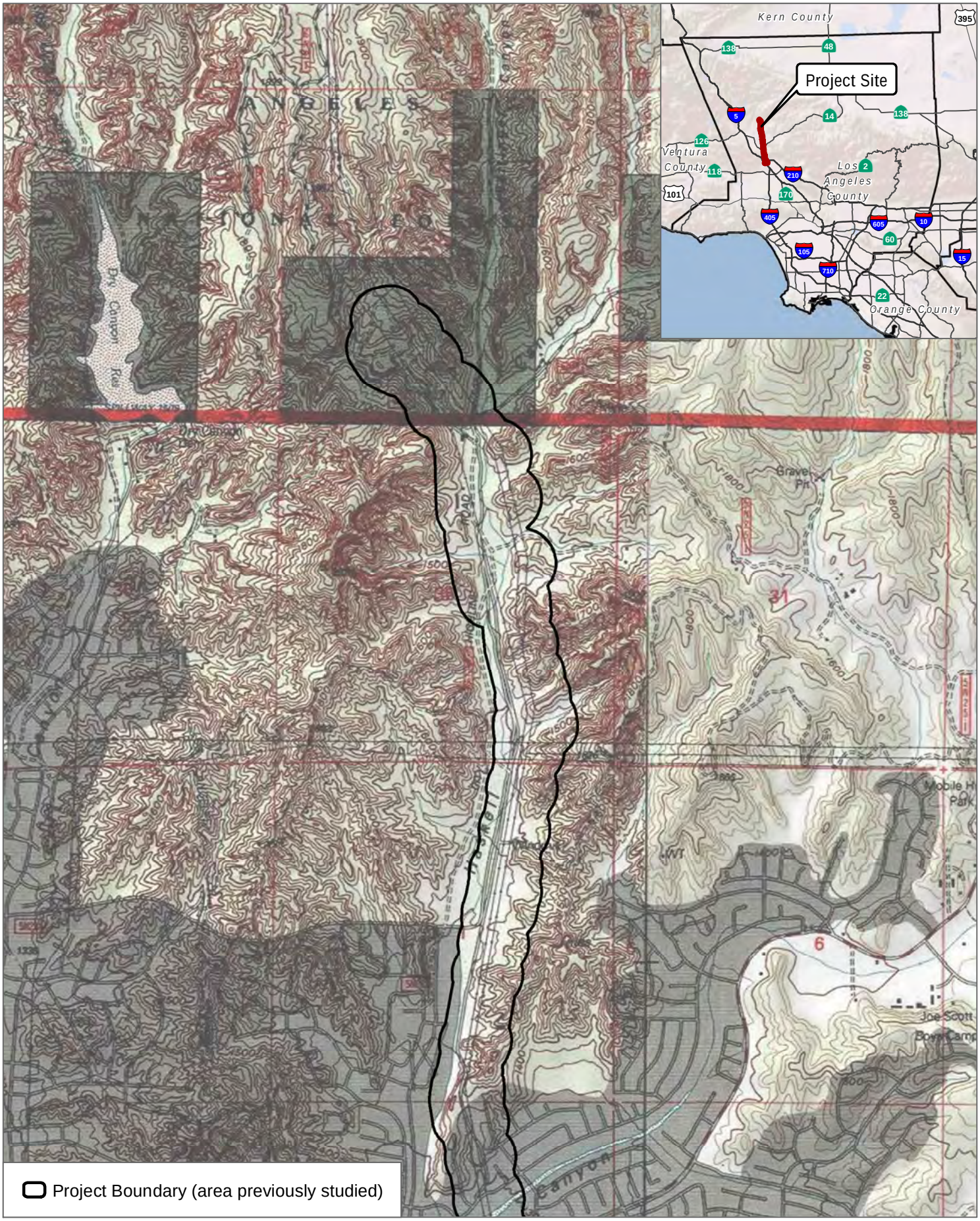
Attachment A

Figures



SOURCE: USGS 7.5-Minute Series Newhall, Mint Canyon, Oat Mountain, San Fernando Quadrangles

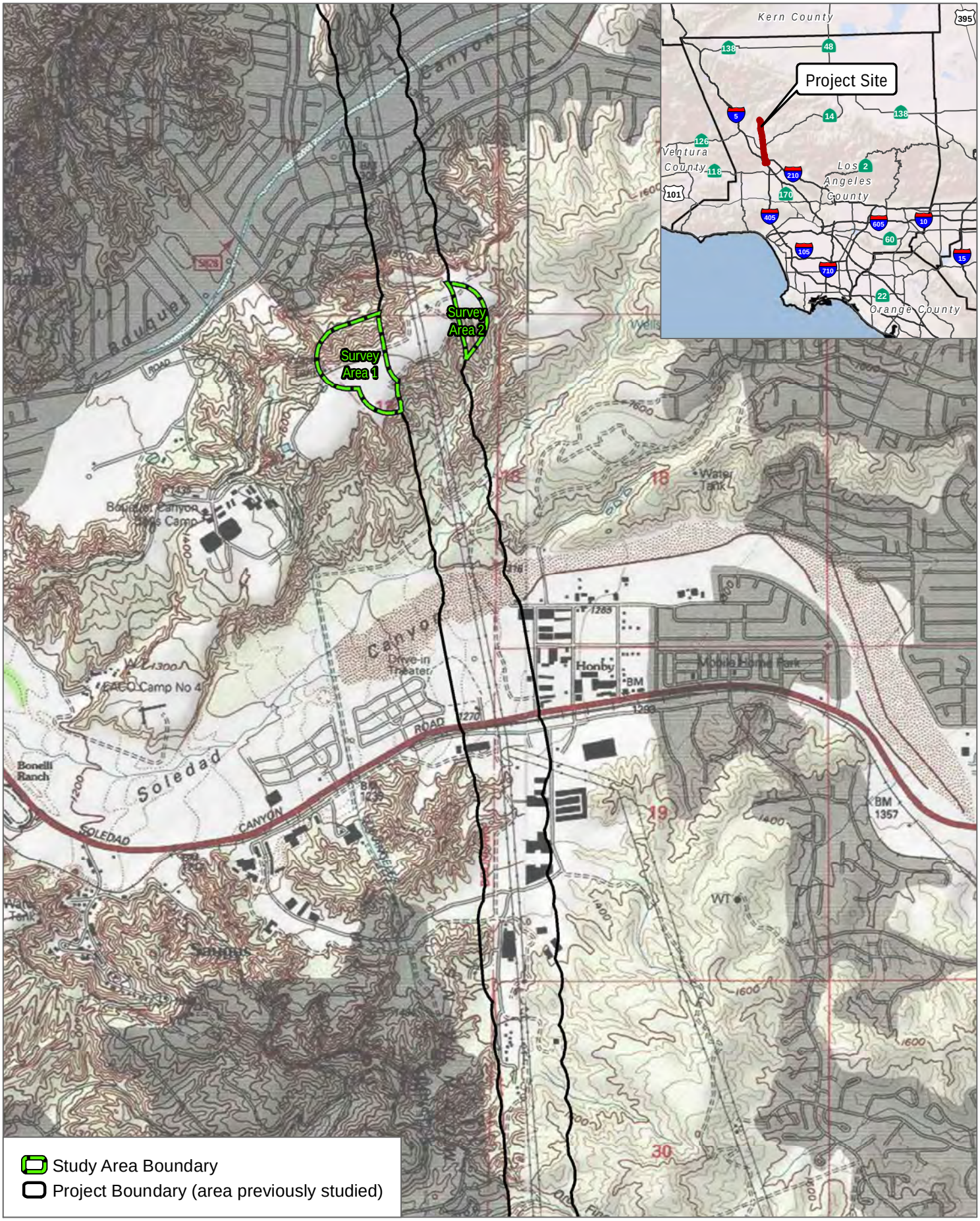
Los Angeles Department of Water & Power

0 1,000 2,000 Feet

FIGURE 1A

Project Location

LADWP PP 1 & PP 2 Transmission Line Conversion Project

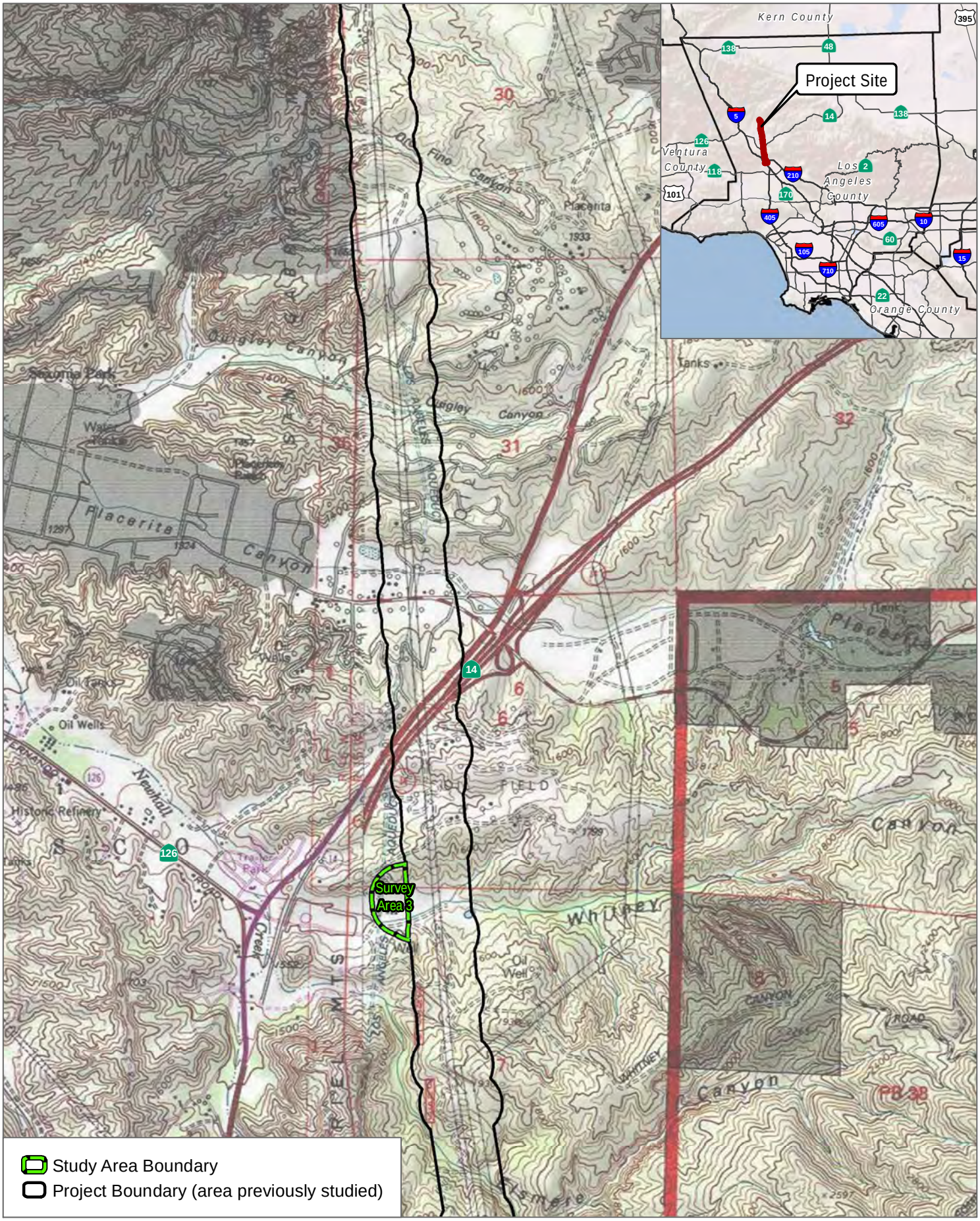


SOURCE: USGS 7.5-Minute Series Newhall, Mint Canyon, Oat Mountain, San Fernando Quadrangles

FIGURE 1B

Project Location

LADWP PP 1 & PP 2 Transmission Line Conversion Project



SOURCE: USGS 7.5-Minute Series Newhall, Mint Canyon, Oat Mountain, San Fernando Quadrangles

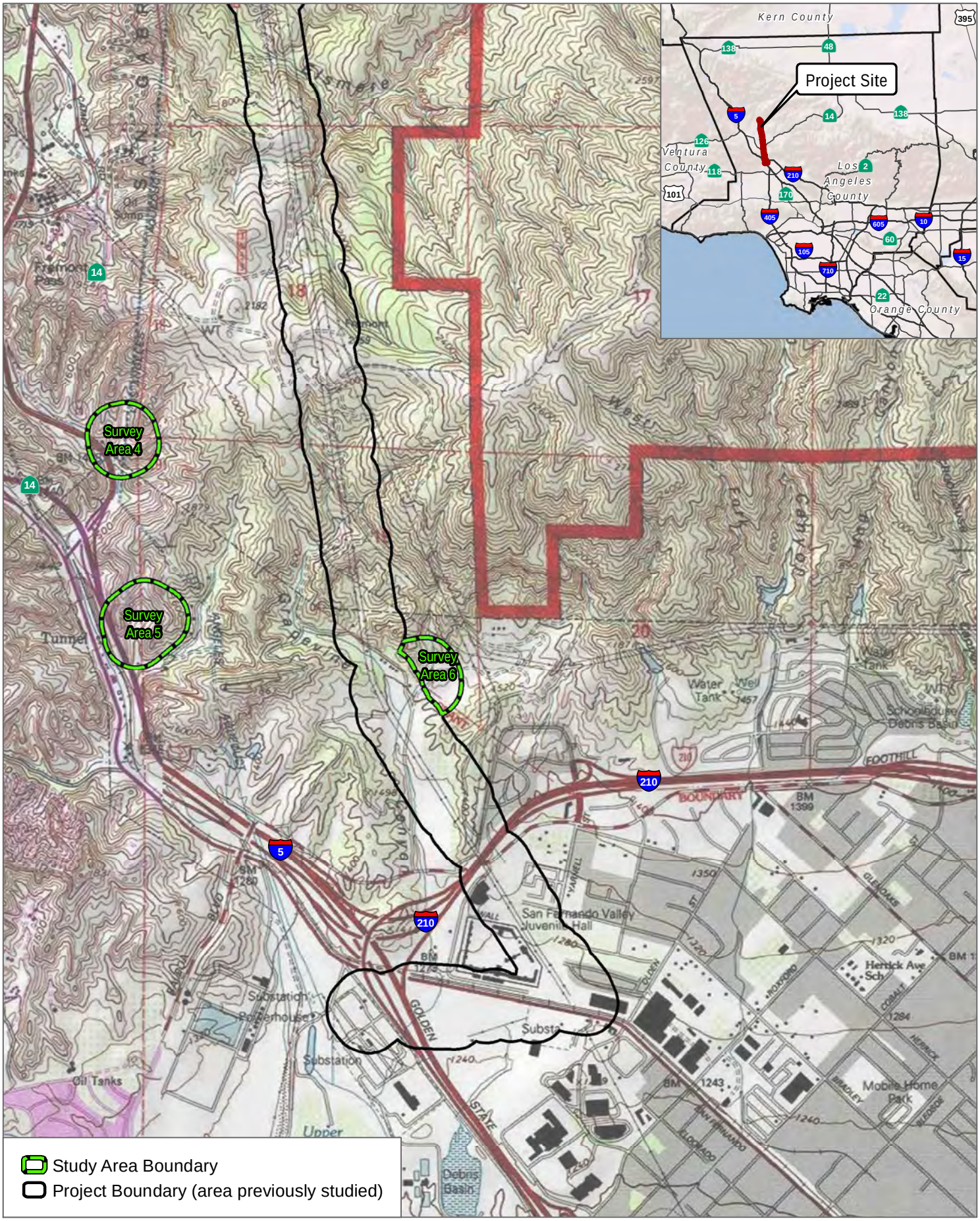
Los Angeles Department of Water & Power

0 1,000 2,000 Feet

FIGURE 1C

Project Location

LADWP PP 1 & PP 2 Transmission Line Conversion Project



SOURCE: USGS 7.5-Minute Series Newhall, Mint Canyon, Oat Mountain, San Fernando Quadrangles

Los Angeles Department of Water & Power

0 1,000 2,000 Feet

FIGURE 1D

Project Location

LADWP PP 1 & PP 2 Transmission Line Conversion Project

Survey Area Labels
Survey Area Boundary
Project Boundary (previously studied)
California Gnatcatcher Suitable Habitats

Vegetation Communities

ADEFAS, Chamise chaparral
ARTCAL, California sagebrush scrub
DEV, Urban/Developed
DH, Disturbed Habitat
ENCFAR, Brittle bush scrub
ERIFASFOL, California buckwheat scrub
NNG, Mediterranean California naturalized annual and perennial grassland
ORN, Parks and ornamental plantings
PRUILI, Holly leaf cherry chaparral
QUEBER, Scrub oak chaparral
QUEBER-ADEFAS, Scrub oak-chamise
UVC, Unvegetated Channel

SOURCE: Bing maps 2018

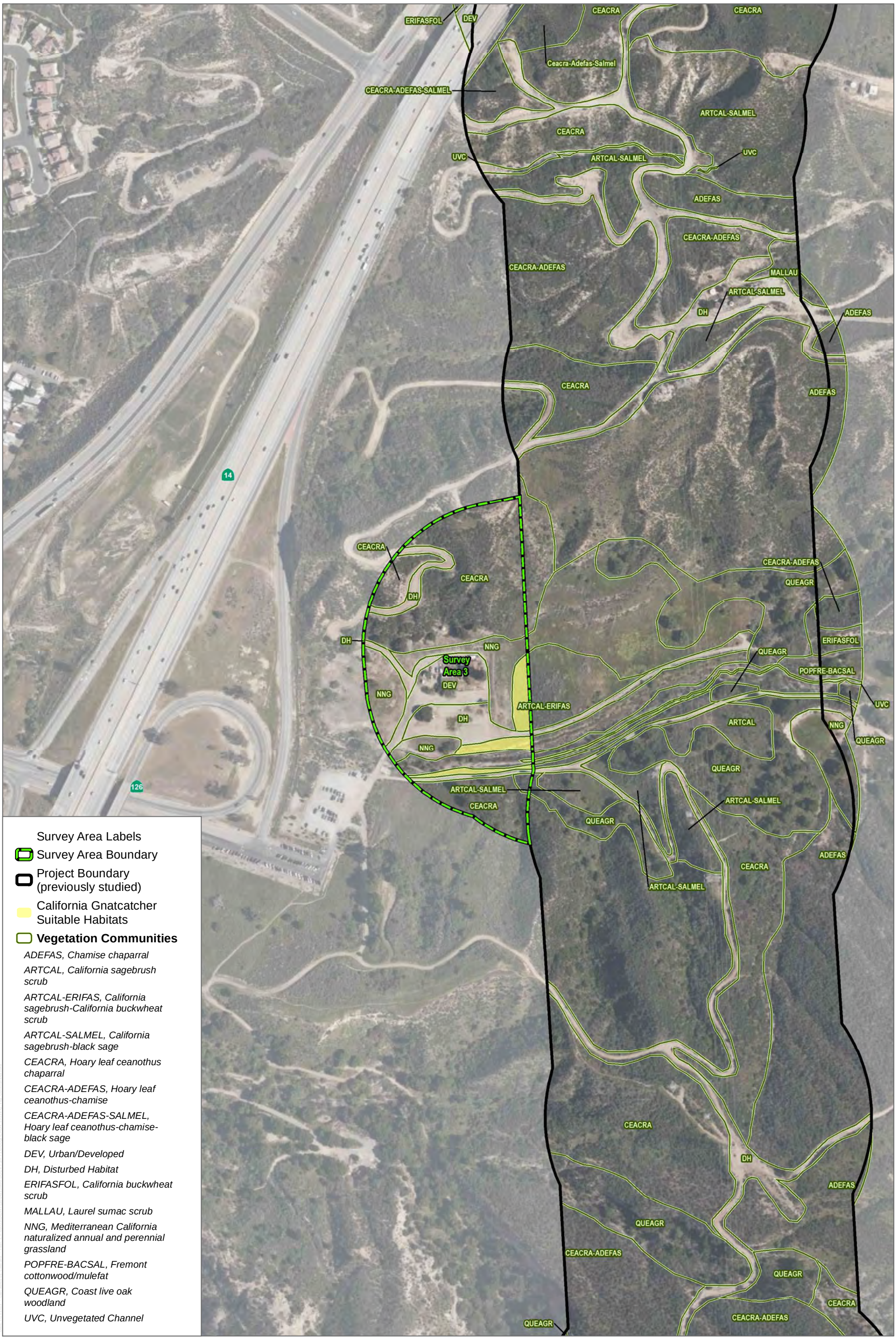
LA DWP Los Angeles Department of Water & Power

0 150 300 Feet

FIGURE 2A

Vegetation Communities Map

LADWP PP 1 & PP 2 Transmission Line Conversion Project



SOURCE: Bing maps 2018

Los Angeles Department of Water & Power

0 150 300 Feet

FIGURE 2B

Vegetation Communities Map

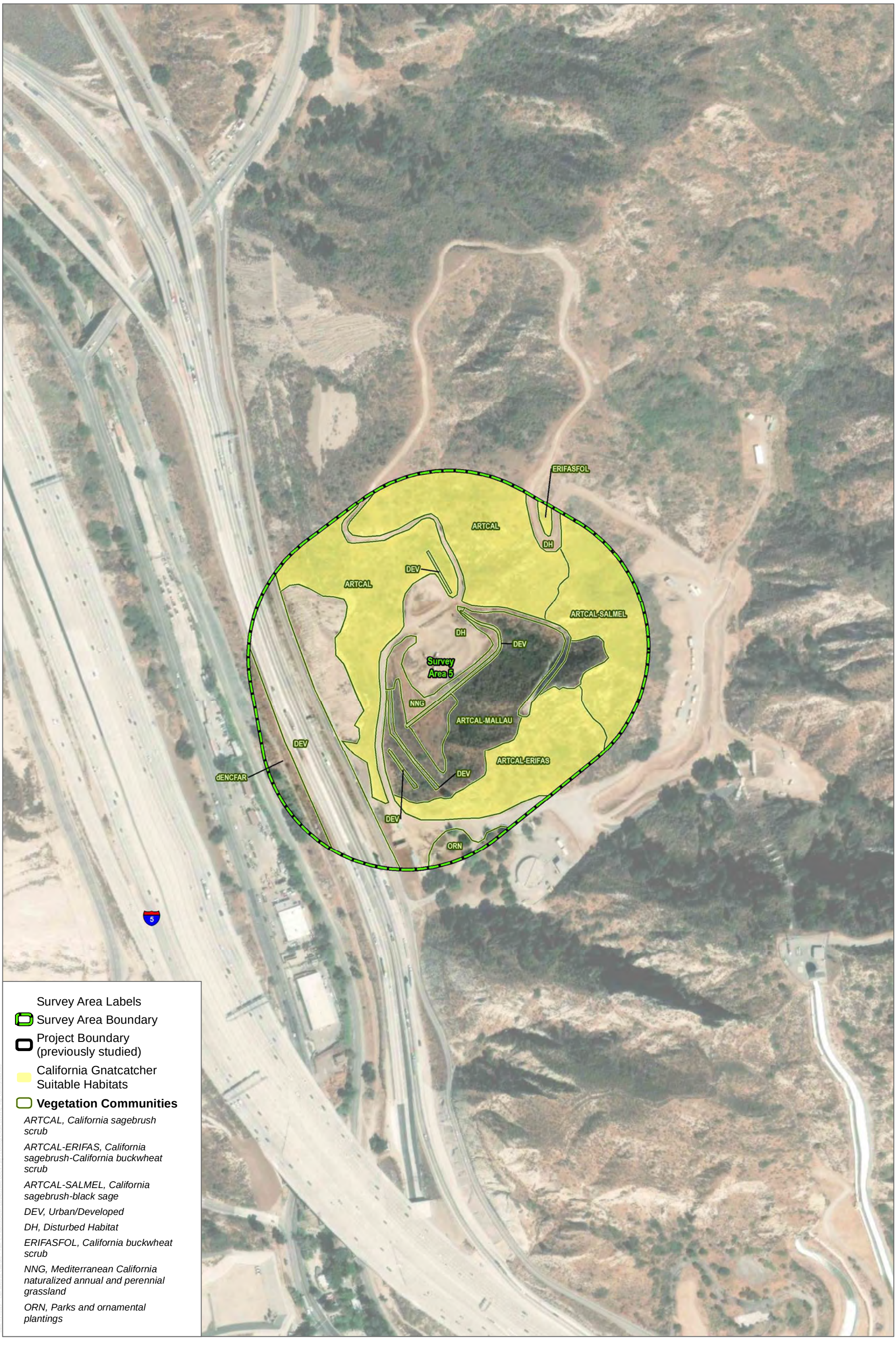
LADWP PP 1 & PP 2 Transmission Line Conversion Project

SOURCE: Bing maps 2018

FIGURE 2C

Vegetation Communities Map

LADWP PP 1 & PP 2 Transmission Line Conversion Project



SOURCE: Bing maps 2018

LA DWP Los Angeles Department of Water & Power

0 150 300 Feet

FIGURE 2D

Vegetation Communities Map

LADWP PP 1 & PP 2 Transmission Line Conversion Project

Survey Area Labels
Survey Area Boundary
Project Boundary (previously studied)
California Gnatcatcher Suitable Habitats

Vegetation Communities

ADEFAS, Chamise chaparral
ADEFAS-SALMEL, Chamise-black sage chaparral
ARTCAL, California sagebrush scrub
ARTCAL-SALMEL, California sagebrush-black sage
BACSAL, Mulefat thickets
DEV, Urban/Developed
DH, Disturbed Habitat
ENCFAR, Brittle bush scrub
ERIFASFOL, California buckwheat scrub
ERIFASFOL-ENCFAR, California buckwheat-brittle bush
MALLAU, Laurel sumac scrub
MALLAU-ARTCAL, Laurel sumac-California sagebrush
NNG, Mediterranean California naturalized annual and perennial grassland
ORN, Parks and ornamental plantings
POPFRE, Fremont cottonwood forest
QUEAGR, Coast live oak woodland
QUEAGR-JUGCAL, Coast live oak-California walnut
SALGOO, Black willow thickets
SALLAE, Red willow thickets
SALMEL, Black sage scrub
SALMEL-ENCFAR, Black sage-brittle bush
UVC, Unvegetated Channel

SOURCE: Bing maps 2018

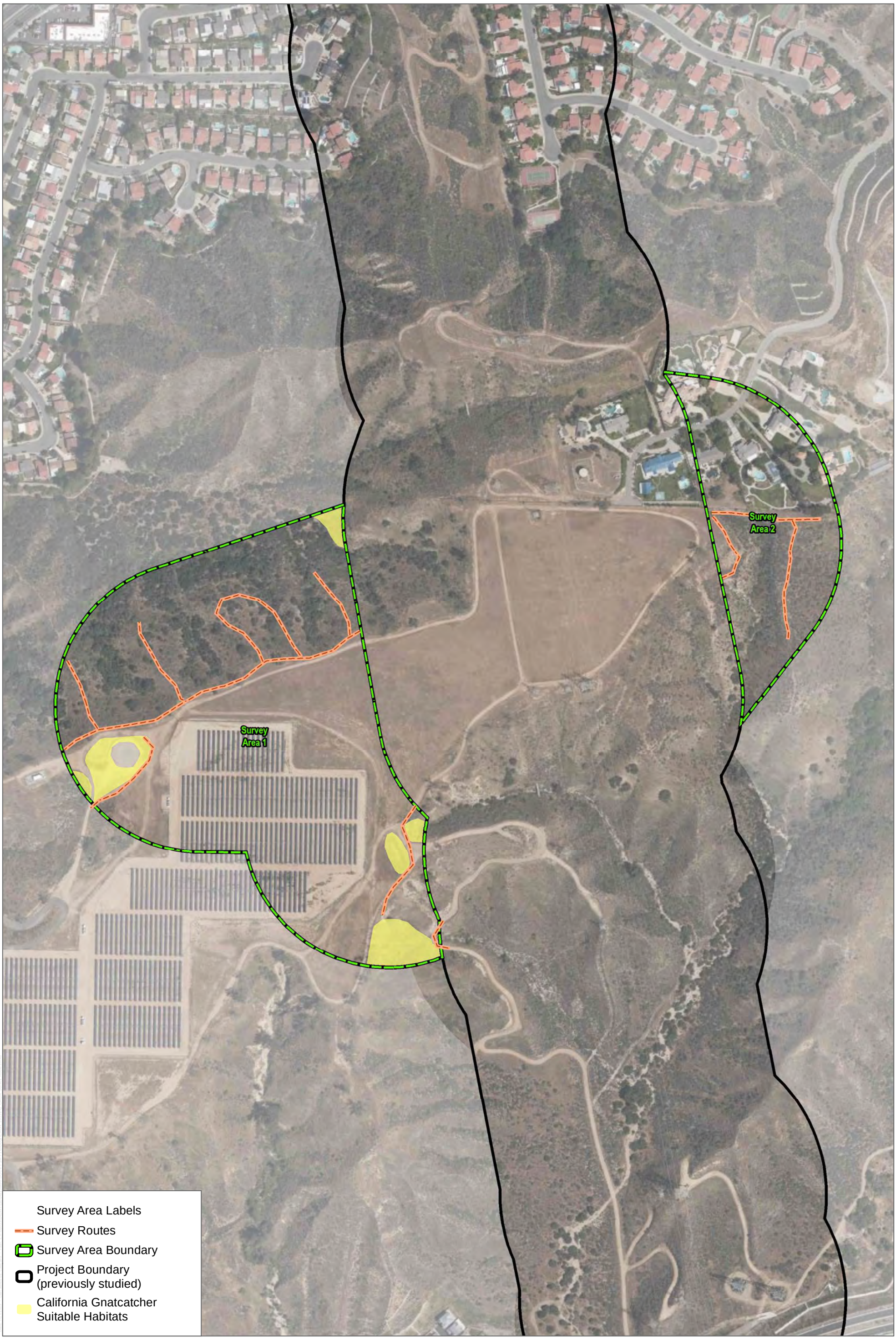
Los Angeles Department of Water & Power

0 150 300 Feet

FIGURE 2E

Vegetation Communities Map

LADWP PP 1 & PP 2 Transmission Line Conversion Project



SOURCE: Bing maps 2018

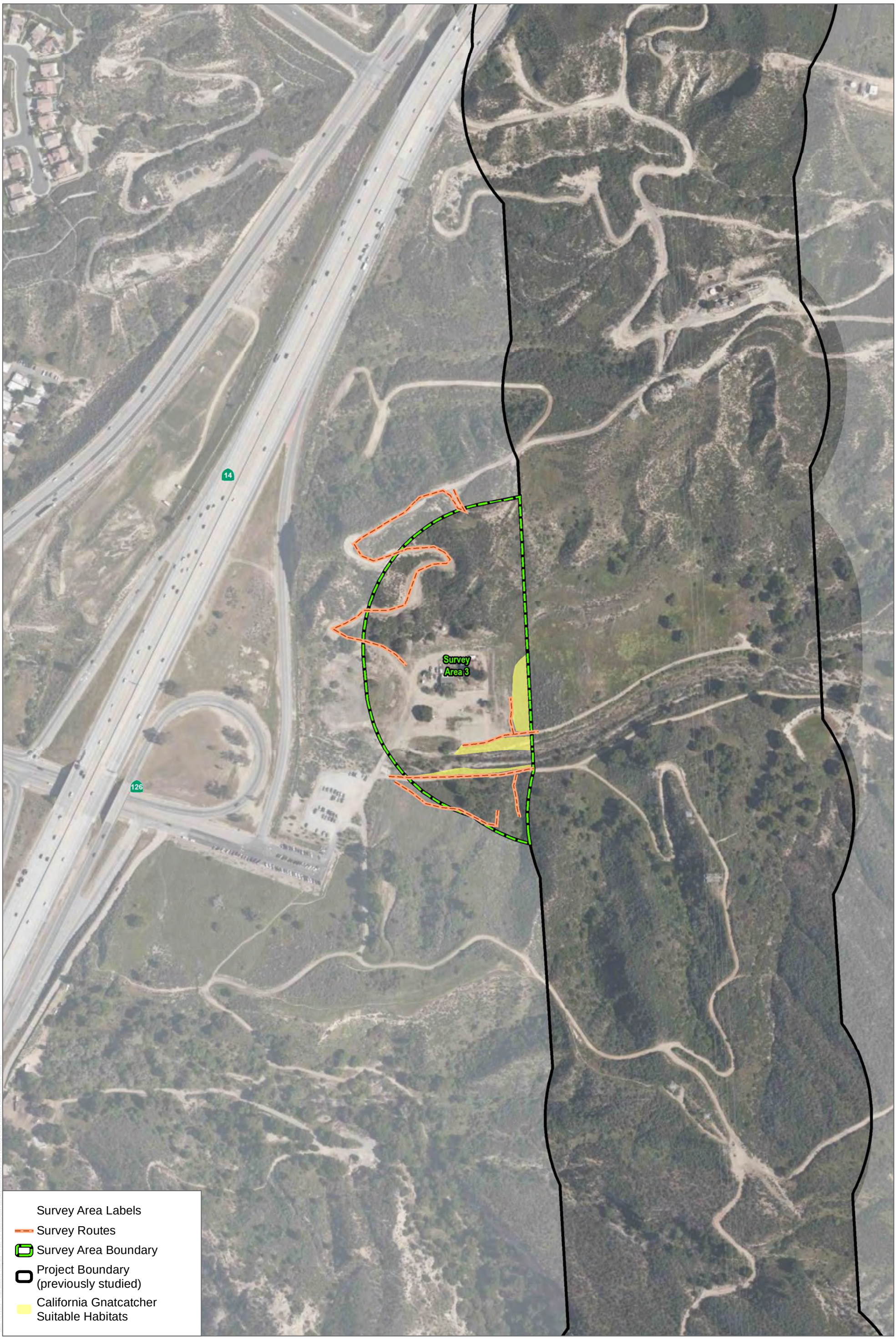
Los Angeles Department of Water & Power

0 150 300 Feet

FIGURE 3A

California Gnatcatcher Survey Areas

LADWP PP 1 & PP 2 Transmission Line Conversion Project



SOURCE: Bing maps 2018

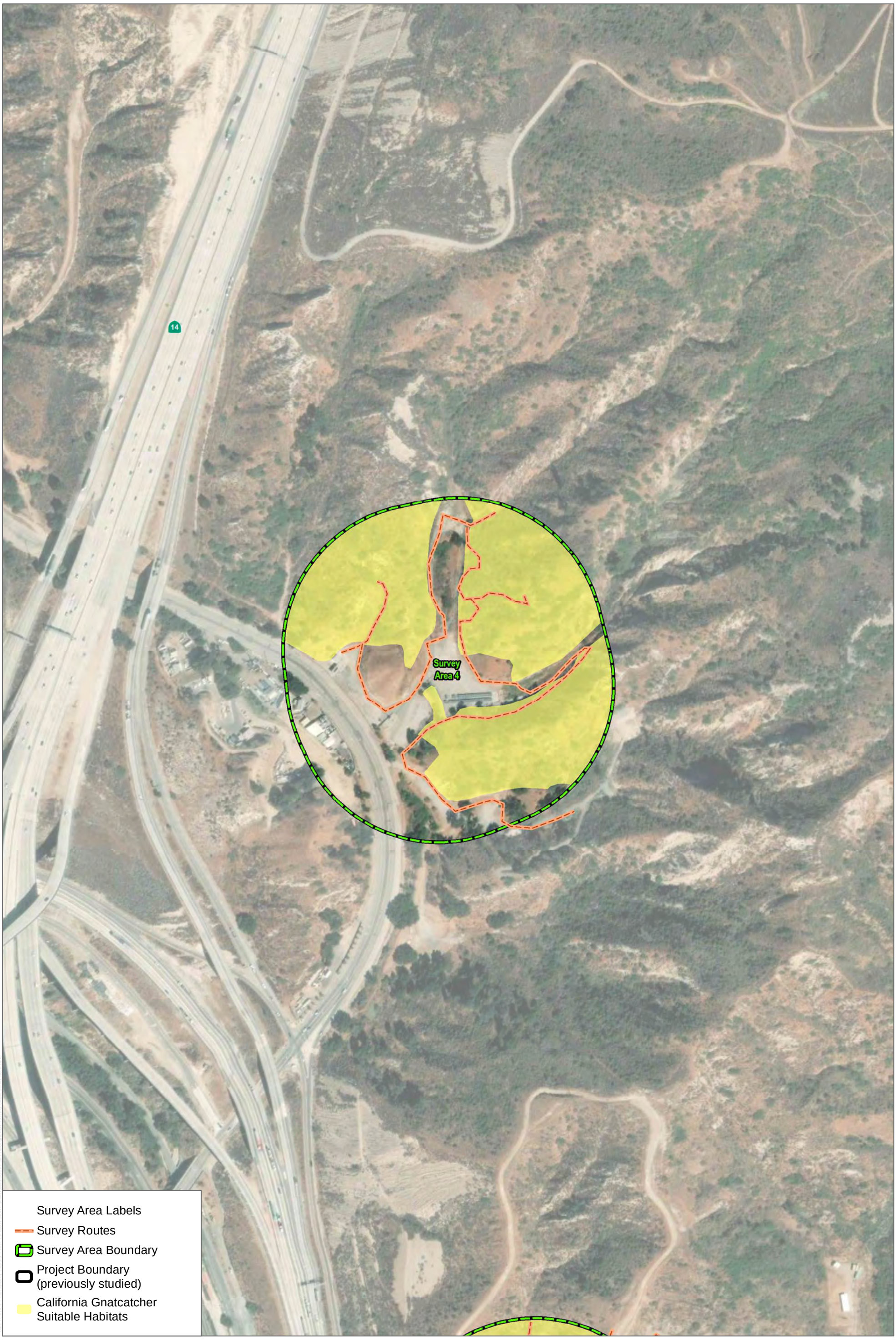
LA DWP Los Angeles Department of Water & Power

0 150 300 Feet

FIGURE 3B

California Gnatcatcher Survey Areas

LADWP PP 1 & PP 2 Transmission Line Conversion Project



SOURCE: Bing maps 2018

Los Angeles Department of Water & Power

0 150 300 Feet

FIGURE 3C

California Gnatcatcher Survey Areas

LADWP PP 1 & PP 2 Transmission Line Conversion Project

SOURCE: Bing maps 2018

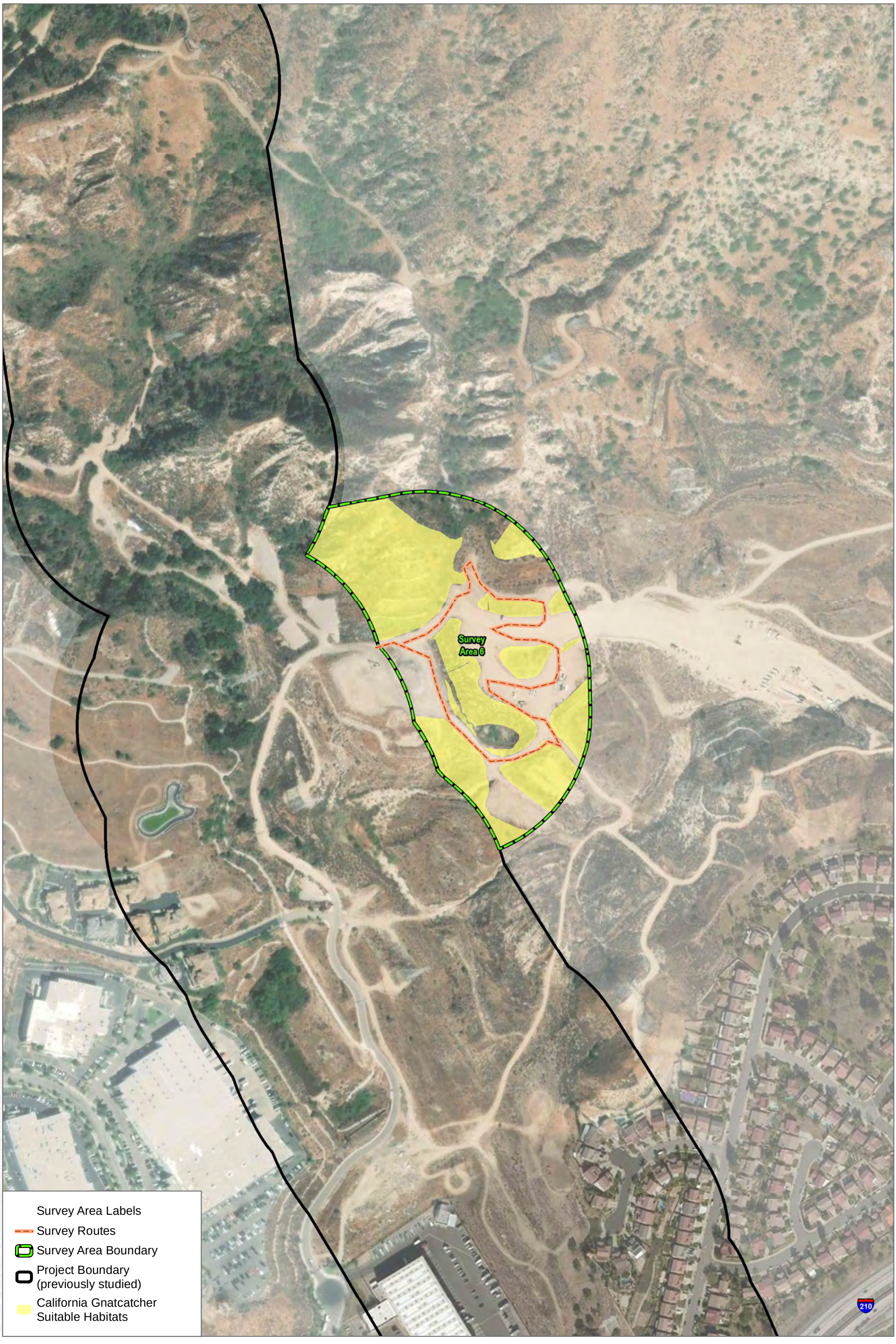
LA DWP Los Angeles Department of Water & Power

0 150 300 Feet

FIGURE 3D

California Gnatcatcher Survey Areas

LADWP PP 1 & PP 2 Transmission Line Conversion Project



SOURCE: Bing maps 2018

LA DWP Los Angeles Department of Water & Power

0 150 300 Feet

FIGURE 3E

California Gnatcatcher Survey Areas

LADWP PP 1 & PP 2 Transmission Line Conversion Project

Attachment B

Cumulative List of Bird Species Observed

BIRD

ACCIPITRIDAE—HAWKS, KITES, EAGLES, & ALLIES

Accipiter cooperii—Cooper's hawk

Buteo jamaicensis—red-tailed hawk

AEGITHALIDAE—LONG-TAILED TITS & BUSHTITS

Psaltriparus minimus—bushtit

ALAUDIDAE—LARKS

Eremophila alpestris—horned lark

APODIDAE—SWIFTS

Aeronautes saxatalis—white-throated swift

CARDINALIDAE—CARDINALS & ALLIES

Pheucticus melanocephalus—black-headed grosbeak

CATHARTIDAE—NEW WORLD VULTURES

Cathartes aura—turkey vulture

COLUMBIDAE—PIGEONS & DOVES

Patagioenas fasciata—band-tailed pigeon

Zenaida macroura—mourning dove

CORVIDAE—CROWS & JAYS

Aphelocoma californica—California scrub-jay

Corvus brachyrhynchos—American crow

Corvus corax—common raven

CUCULIDAE—CUCKOOS, ROADRUNNERS, & ANIS

Geococcyx californianus—greater roadrunner

FALCONIDAE—CARACARAS & FALCONS

Falco peregrinus anatum—American peregrine falcon

Falco sparverius—American kestrel

FRINGILLIDAE—FRINGILLINE & CARDUELINE FINCHES & ALLIES

Haemorhous mexicanus—house finch

Spinus psaltria—lesser goldfinch

HIRUNDINIDAE—SWALLOWS

Petrochelidon pyrrhonota—cliff swallow

Stelgidopteryx serripennis—northern rough-winged swallow

Tachycineta thalassina—violet-green swallow

MIMIDAE—MOCKINGBIRDS & THRASHERS

Mimus polyglottos—northern mockingbird

ODONTOPHORIDAE—NEW WORLD QUAIL

Callipepla californica—California quail

PARIDAE—CHICKADEES & TITMICE

Baeolophus inornatus—oak titmouse

PASSERELLIDAE—NEW WORLD SPARROWS

Aimophila ruficeps—rufous-crowned sparrow

Melospiza melodia—song sparrow

Melozone crissalis—California towhee

Pipilo maculatus—spotted towhee

PICIDAE—WOODPECKERS & ALLIES

Melanerpes formicivorus—acorn woodpecker

Dryobates nuttallii—Nuttall's woodpecker

PTILOGONATIDAE—SILKY-FLYCATCHERS

Phainopepla nitens—phainopepla

STURNIDAE—STARLINGS

* *Sturnus vulgaris*—European starling

TIMALIIDAE—BABBLERS

Chamaea fasciata—wrentit

TROCHILIDAE—HUMMINGBIRDS

Calypte anna—Anna's hummingbird

Selasphorus sasin—Allen's hummingbird

TROGLODYTIDAE—WRENS

Catherpes mexicanus—canyon wren

Thryomanes bewickii—Bewick’s wren

Troglodytes aedon—house wren

TYRANNIDAE—TYRANT FLYCATCHERS

Myiarchus cinerascens—ash-throated flycatcher

Sayornis nigricans—black phoebe

Tyrannus vociferans—Cassin's kingbird

* signifies introduced (non-native) species

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ATTACHMENT A2

Focused Special-Status Plant Species Survey Results

38 NORTH MARENGO AVENUE
PASADENA, CALIFORNIA 91101
T 626.204.9800 F 626.204.9834

July 15, 2019 10649.19

Ms. Kathryn Laudeman
Environmental Planning and Assessment
Los Angeles Department of Water and Power
Los Angeles, California 90012

Subject: *2019 Focused Special-Status Plant Species Survey Results for the Revised PP1 & PP2 Transmission Line Conversion Project – Project Design Updates (Five Helicopter Sites)*

Dear Ms. Laudeman:

1 Introduction

The PP1 & PP2 Transmission Line Conversion Project (project) is an approximately 12-mile alignment that spans across the City of Los Angeles, the City of Santa Clarita, and unincorporated Los Angeles County (Attachment A – Figure 1). The project proposes to replace and convert an existing 115 kilovolt (kV) double circuit transmission line between Haskell Canyon Switching Station and Olive Switching Station to a new 230 kV transmission line between Haskell Canyon Switching Station and Sylmar Switching Station. During 2017 and 2018, Dudek conducted vegetation mapping and jurisdictional delineation updates for minor project plan revisions, focused special-status plant surveys, focused coastal California gnatcatcher surveys (breeding season), focused least Bell's vireo and southwestern willow flycatcher surveys, focused arroyo toad surveys, and focused western spadefoot toad surveys to support preparation of environmental documentation in compliance with the California Environmental Quality Act (CEQA).

Los Angeles Department of Water and Power (LADWP) provided updated project design elements, which included five temporary helicopter laydown areas (helicopter sites). In accordance with Mitigation Measure MM-BIO-1 provided in the Draft Environmental Impact Report for the Plant 1 and Power Plant 2 Transmission Line Conversion Project (Draft EIR; Dudek 2019), focused special-status plant species surveys are required for the five helicopter sites. The purpose of this letter report is to satisfy the requirements outlined in MM-BIO-1 with special-status plant species surveys and results.

1.1 Survey Area

The survey area comprises the five helicopter sites including a 200-foot survey buffers totaling 70.3 acres. Of this 70.3 acres, 53.9 acres were not surveyed during 2017 and 2018 Dudek special-status plant species surveys. The 2019 focused special-status plant species surveys included these 53.9 acres.

2 Methods

2.1 Literature Review

Prior to conducting the focused special-status plant species surveys, a literature review was conducted to evaluate the environmental setting of the project alignment and identify potential special-status biological resources that may be found on the site. The review included Warm Springs Mountain, Green Valley, Newhall, Mint Canyon, Oat Mountain, San Fernando, Canoga Park, and Van Nuys U.S. Geological Survey 7.5-minute quadrangles (USGS 2019) and the County geographic information system (GIS) data portal (County of Los Angeles 2019). Additionally, a database query was conducted to identify special-status biological resources present or potentially present within the survey area using the California Natural Diversity Database (CNDDB) (CDFW 2019), California Native Plant Society (CNPS) *Online Inventory of Rare and Endangered Vascular Plants* (CNPS 2019), U.S. Fish and Wildlife Service (USFWS) species occurrence data (USFWS 2019a), and USFWS Information for Planning and Conservation System (USFWS 2019b). A 5-mile buffer around the action area was queried in the USFWS data using GIS software, and a query of the above mentioned quadrangles was conducted of the CNPS inventory and CNDDB.

Additionally the Biological Technical Report for the Los Angeles Department of Water and Power Plant 1 and Power Plant 2 Transmission Line Conversion Project (Dudek 2019) was reviewed.

2.2 Focused Special-Status Plant Species Surveys

Focused special-status plant species surveys were conducted within the special-status plant survey area (including areas that would be directly/indirectly impacted by the proposed project) to determine the presence or absence of plant species that are considered endangered, rare, or threatened under CEQA Guidelines, Section 15380 (14 CCR 15000 et seq.). Suitable special-status plant habitat included all vegetation communities and land covers, with the exception of basins, concrete channels, open water, developed land, and ornamental plantings.

Dudek conducted May 2019 focused special-status plant species surveys to maximize detection of blooming special-status plants (Table 1). Focused special-status plant species surveys were conducted at the appropriate phenological stage of the plant (blooming and fruiting) to detect and identify the target species. Prior to field surveys, Dudek conducted a query of the CNDDB (CDFW 2019) and CNPS (2019) to determine which special-status species are known to occur within the project area and vicinity. Although survey emphasis was placed on determining the presence, or potential for occurrence, of plant species found on state, federal, and California Rare Plant Rank (CRPR) 1B and 2 lists (CNPS 2019), all special-status plant species, including CRPR 3 and 4 species, were mapped if observed. Plant species constituting CRPR 3 and 4 include plant species that may, but generally do not, qualify for protection; thus, require more information to determine status and plants of limited distribution. Only CRPR 3 and 4 plant species that were also locally designated or recognized by the City of Santa Clarita, the County (County of Los Angeles 2006), and/or City of Los Angeles (City of Los Angeles 2006) were analyzed further within this report.

Table 1 – Schedule of Surveys

Date	Time	Personnel	Conditions
5/17/2019	0900-1700	Heather Moine, Mackenzie Forgey	59-69°F, 5-10% cloud cover, 1-5 mile per hour wind

Focused special-status plant species surveys were floristic in nature and conformed to the *CNPS Botanical Survey Guidelines* (CNPS 2001), *Protocols for Surveying and Evaluating Impacts to Special Status Native Populations and Natural Communities* (CDFW 2018b), and the *General Rare Plant Survey Guidelines* (Cypher 2002). The plant species detected during the field surveys were identified to subspecies or variety, if applicable and feasible, to determine sensitivity status.

Scientific and common names for plant species with a CRPR (formerly CNPS List) follow the CNPS On-Line Inventory of Rare, Threatened, and Endangered Plants of California (CNPS 2019). For plant species without a CRPR, scientific names follow the Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California (Jepson Flora Project 2019) and common names follow the California Natural Community list (CDFW 2018a) or the United States Department of Agriculture (USDA) Natural Resources Conservation Service Plants Database (USDA 2019)."

The surveys were conducted by walking meandering 30-meter transects to detect special-status plant species. The 30-meter transects were imported into Environmental Systems Research Institute (ESRI) Collector application and digital devices were used in the field to navigate along the survey transect lines. Special-status plant species observed were mapped in the field using the ESRI Collector application.

2.3 Survey Limitations

The focused special-status plant species survey was conducted during day and during the late spring/early summer season (May 2019), which resulted in detection and identification of most blooming annual and perennial plant species that occur in the area.

3 Results

3.1 Floral Diversity

A total of 143 plant species were observed during the focused special-status plant species surveys conducted within the survey area in 2019. Of the 143 species observed, 94 (66%) are plant species native to California and 49 (34%) are non-native plant species, in total representing 43 families. The list of plant species observed within the survey area is provided in Attachment B to this report.

3.2 Special-Status Plant Species

Five special-status plant species were observed within the survey area and are listed in Table 2 and further discussed below.

Table 2 – Special-Status Plant Species Detected within the Survey Area

Scientific Name	Common Name	Status (Federal/State/CRPR/County/City of LA)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
Calochortus catalinae	Catalina mariposa lily	None/None/4.2/LA County/City of LA	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland/perennial bulbiferous herb/(Feb)Mar–June/45–2,295	Present. This species was observed during focused plant surveys conducted in May 2019. One population was identified within the northern portion of survey area west of Alta Knoll Drive. Suitable habitat for this species occurs within the survey area.
Calochortus clavatus var. *gracilis*	slender mariposa lily	None/None/1B.2/LA County/None	Chaparral, coastal scrub, valley and foothill grassland/perennial bulbiferous herb/Mar–June/1,050–3,281	Present. This species was observed during focused plant surveys conducted in May 2019. Eight populations were identified within the northern portion of survey area west of Alta Knoll Drive. Suitable habitat for this species occurs within the survey area.
Calystegia peirsonii	Peirson's morning-glory	None/None/4.2/LA County/City of LA	Chaparral, chenopod scrub, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland/perennial rhizomatous herb/Apr–June/98–4,921	Present. This species was observed during focused special-status plant surveys conducted in May 2019. One population was identified within the central portion of the survey area northeast of Whitney Canyon Road. Suitable habitat for this species occurs within the survey area.

CRPR = California Rare Plant Rank; LA = Los Angeles.
Status Legend:
CRPR 1B = Plants Rare, Threatened, or Endangered in California and Elsewhere.
CRPR 3 = Plants About Which More Information is Needed - A Review List.

CRPR 4 = Plants of Limited Distribution - A Watch List.
.1 Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat).
.2 Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat).
.3 Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known).

No state and/or federally listed plant species were detected during focused special-status plant surveys in 2019. Three non-listed special-status plant species were observed within the survey area during focused surveys conducted in May 2019: Catalina mariposa lily (Calochortus catalinae), slender mariposa lily (*Calochortus clavatus* var. *gracilis*), and Peirson's morning-glory (*Calystegia peirsonii*). These plant species are further discussed below and locations of special-status plant species observed during focused plant surveys are depicted in Attachment B – Figures 2-1 through 2-5, Special-Status Plant Species Observations.

Catalina Mariposa Lily (*Calochortus catalinae*)

Catalina mariposa lily is a CRPR 4.2, as well as a locally-designated sensitive species within County SEAs and the City of Los Angeles. Catalina mariposa lily is a perennial bulbiferous herb, endemic to California, and is found in chaparral, cismontane woodland, coastal scrub, and valley and foothill grasslands (CNPS 2018). This species' blooming period is from (sometimes February) March to June. Catalina mariposa lily occurs between 45 and 2,295 feet above mean sea level (amsl).

This species was observed on steep hillsides within non-native grasslands and chamise chaparral in the northern portion of the survey area. One population was observed west of Alta Knoll Drive with one individual.

Slender Mariposa Lily (*Calochortus clavatus* var. *gracilis*)

Slender mariposa lily is a CRPR 1B.2, as well as a locally-designated sensitive species within County Significant Ecological Areas (SEAs). Slender mariposa lily is a perennial bulbiferous herb, endemic to California, and is found in chaparral, coastal scrub, and valley and foothill grasslands (CNPS 2019). This species' blooming period is from March to June. Slender mariposa lily occurs between 1,050 and 3,281 feet amsl.

This species was observed on steep hillsides within non-native grasslands and chamise chaparral in the northern portion of the survey area. Eight populations were observed west of Alta Knoll Drive with populations consisting of one to 22 individuals.

Peirson's Morning-Glory (*Calystegia peirsonii*)

Peirson's morning-glory is a CRPR 4.2, as well as a locally-designated sensitive species within County SEAs and the City of Los Angeles. Peirson's morning-glory is a perennial rhizomatous herb, endemic to California, and is found in chaparral, chenopod scrub, cismontane woodland, coastal scrub, lower montane coniferous forest, and valley and foothill grasslands (CNPS 2019). This species' blooming period is from April to June. Peirson's morning-glory occurs between 98 and 4,921 feet amsl.

This species was observed within California sagebrush-California buckwheat scrub in the central portion of the survey area. One population was observed northeast of Whitney Canyon Road, with the population consisting of six individuals.

4 Impacts

As described in Table 2 and Section 3.2, no state- or federally listed special-status plant species were observed within the focused special-status plant species survey area. Three non-listed special-status species were observed within the focused special-status survey area: Catalina mariposa lily (CRPR 4.2, County, City of Los Angeles), slender mariposa lily (CRPR 1B.2, Los Angeles County), Plummer's mariposa lily (CRPR 4.2, County, City of Los Angeles), and Peirson's morning-glory (CRPR 4.2, County, City of Los Angeles).

4.1 Direct Impacts

Focused special-status plant species surveys were conducted in 2019 to capture plants with potential to occur within the survey area. The proposed project would result in direct impacts to one non-listed plant species: Peirson's morning-glory. Due to seasonal variability and climate fluctuations, it is impossible to predict the absolute number of individuals of Peirson's morning-glory that would be lost as a result of the proposed project. Therefore, impacts are based on occupied habitat for each of these species that would be affected by project implementation. Permanent impacts would result from construction activities as summarized in Table 3.

Table 3 – Potential Ground-Disturbing Impacts to Occupied Habitat for Non-Listed Plant Species from the Proposed Project

Species	CRPR	Occupied Habitat (Acres)	Permanent Impacts (Acres)	Temporary Impacts (Acres)
Peirson's morning-glory	4.2	0.009836	0.009836	0

Notes: CRPR = California Rare Plant Rank.

Peirson's Morning-Glory

During 2017 and 2018 Dudek special-status plant species surveys within portions of the project site outside of the five helicopter sites, a total of 0.37 acres and 30 individuals of Peirson's morning-glory was observed. Within this area, the proposed project would result in 0.02 acres of permanent and temporary impacts (Dudek 2019).

During 2019 special-status plant species surveys within the five helicopter site survey areas a total of six Peirson's morning-glory individuals occupying 0.009836 acres were observed (Attachment A – Figure 2.2). Project impacts within the five helicopter sites would result in 0.009836 acres of permanent impacts.

Total occupied habitat of Peirson's morning-glory for the entire project site, the five helicopter sites and outside the five helicopter sites, is 0.379836 acres. The proposed five helicopter sites would permanently impact 0.009836 acres, or 2.6% of the occupied habitat for this species. CRPR 4 plants are not considered Rare from a statewide perspective; are not defined as Rare, Threatened, or Endangered pursuant to CEQA; and are not eligible for state listing as Threatened or Endangered. Therefore, this impact would be adverse, but not significant. The loss of Peirson's morning-glory individuals is not considered a significant impact for the following reasons: the species has a scattered distribution in the County throughout the Transverse Range (i.e., San Bernardino Mountains and San Gabriel Mountains), and as discussed, CRPR 4 plants are not considered Rare from a statewide perspective. As such, this impact would not reduce regional

populations of the species to below self-sustaining numbers and impacts to Peirson's morning-glory would be less-than-significant, absent mitigation.

4.2 Indirect Impacts

Potential short-term indirect impacts to suitable habitat outside of the focused special-status plant species survey area and special-status plants detected in the survey area would primarily result from construction activities and could include impacts related to or resulting from the generation of fugitive dust, as a result of human trampling of vegetation outside the work areas, colonization of non-native or invasive plants, changes in hydrology resulting from construction, including sedimentation and erosion, introduction of chemical pollutants, and damage from inadvertent fires during construction. Potential short-term or temporary indirect impacts to special-status plants are considered significant absent mitigation.

Implementation of MM-BIO-2 from the Draft EIR would reduce potential impacts to a less-than-significant level. This measure provides for environmental training, biological monitoring, verification of the stormwater pollution prevention plan (SWPPP), and general monitoring of the BMPs. Additionally, prior to commencement of any ground-disturbing activities, temporary construction fencing would be installed to identify the limits of grading/disturbance, which would reduce potential human trampling outside of the construction limits and minimize the potential spread of non-native weeds or invasive plants. MM-BIO-3 requires implementation of stormwater best management practices and MM-BIO-4 requires a fire management plan which identifies fire prevention procedures during construction. Implementation of these measures would minimize impacts from generation of fugitive dust, fire hazard, and chemical pollutants. Potential indirect impacts to special-status plant species would be less than significant with implementation of MM-BIO-2, MM-BIO-3, and MM-BIO-4 from the Draft EIR.

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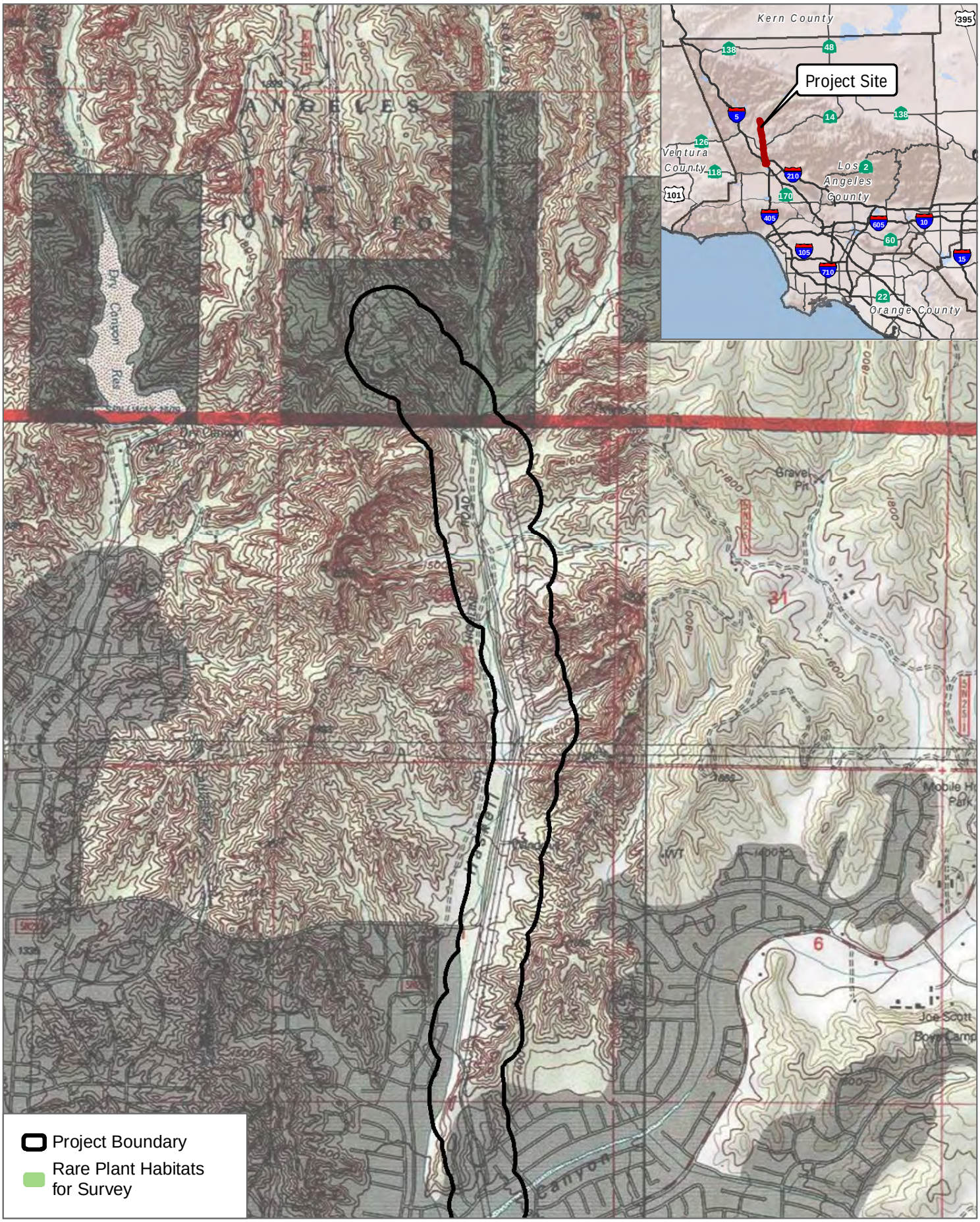
Attachment A

Figures

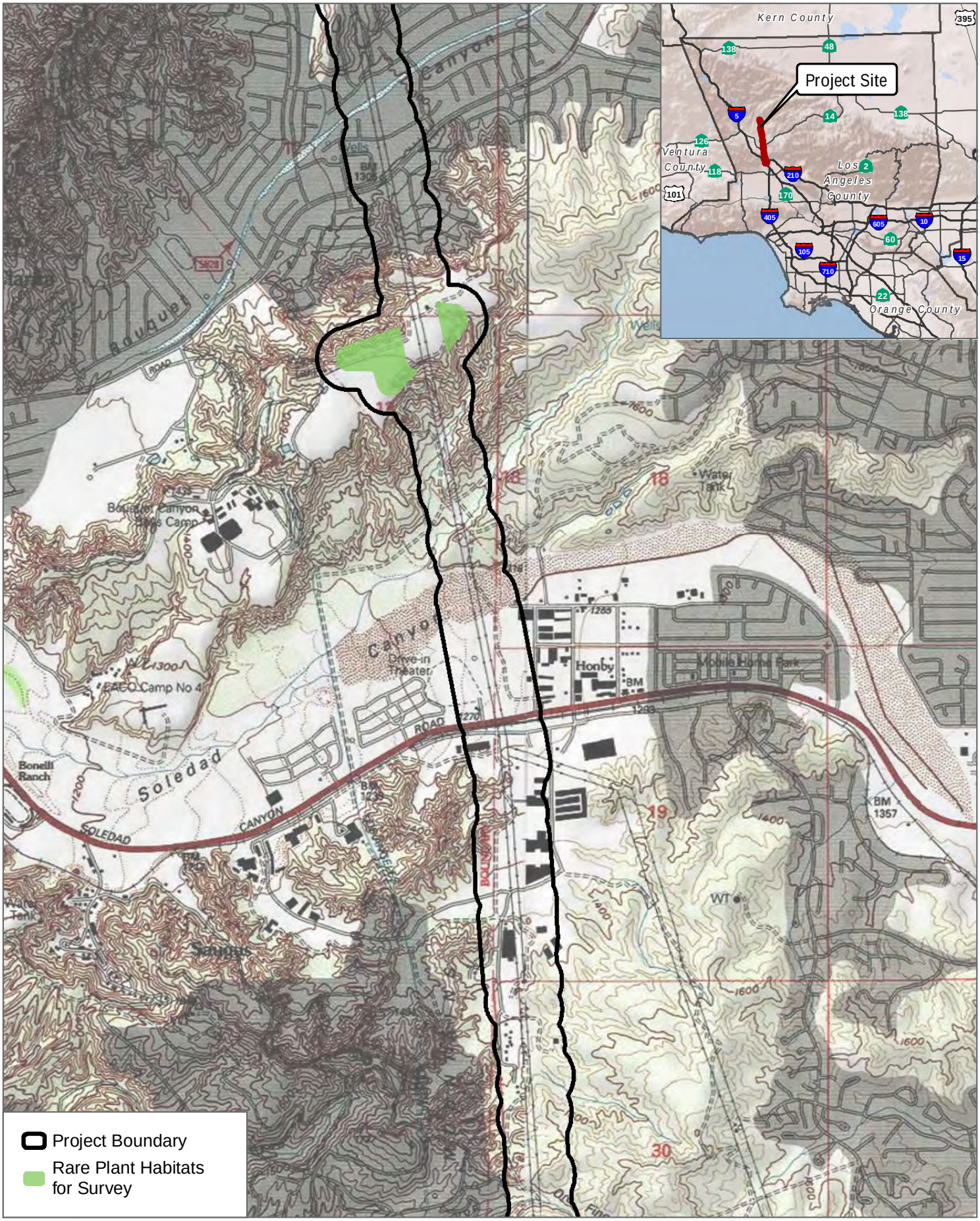


SOURCE: USGS 7.5-Minute Series Newhall, Mint Canyon, Oat Mountain, San Fernando Quadrangles

FIGURE 1A

Project Location

LADWP PP1/PP2, 2019 Special-Status Plant Species Survey Results



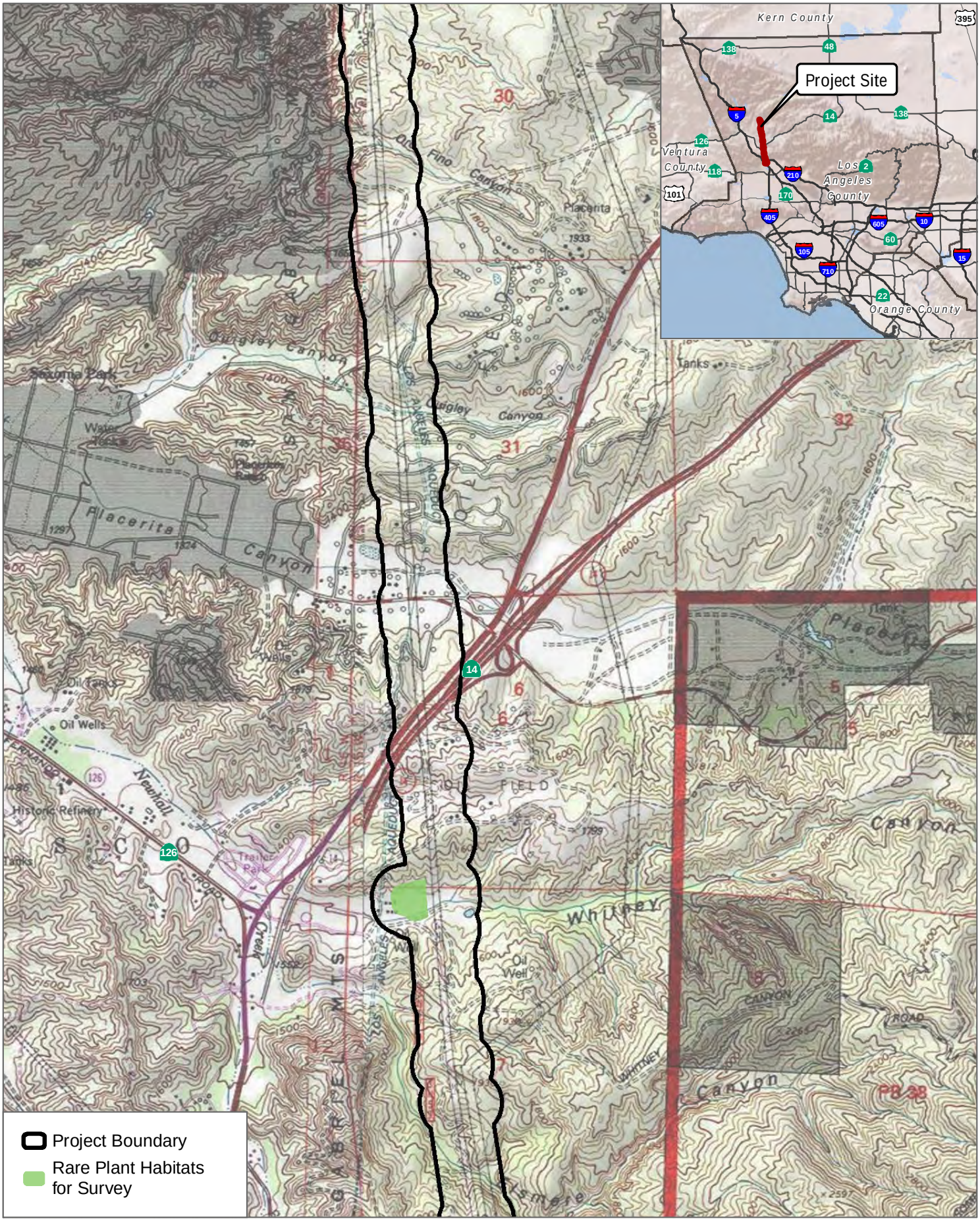
SOURCE: USGS 7.5-Minute Series Newhall, Mint Canyon, Oat Mountain, San Fernando Quadrangles

Los Angeles Department of Water & Power

FIGURE 1B

Project Location

LADWP PP1/PP2, 2019 Special-Status Plant Species Survey Results



SOURCE: USGS 7.5-Minute Series Newhall, Mint Canyon, Oat Mountain, San Fernando Quadrangles

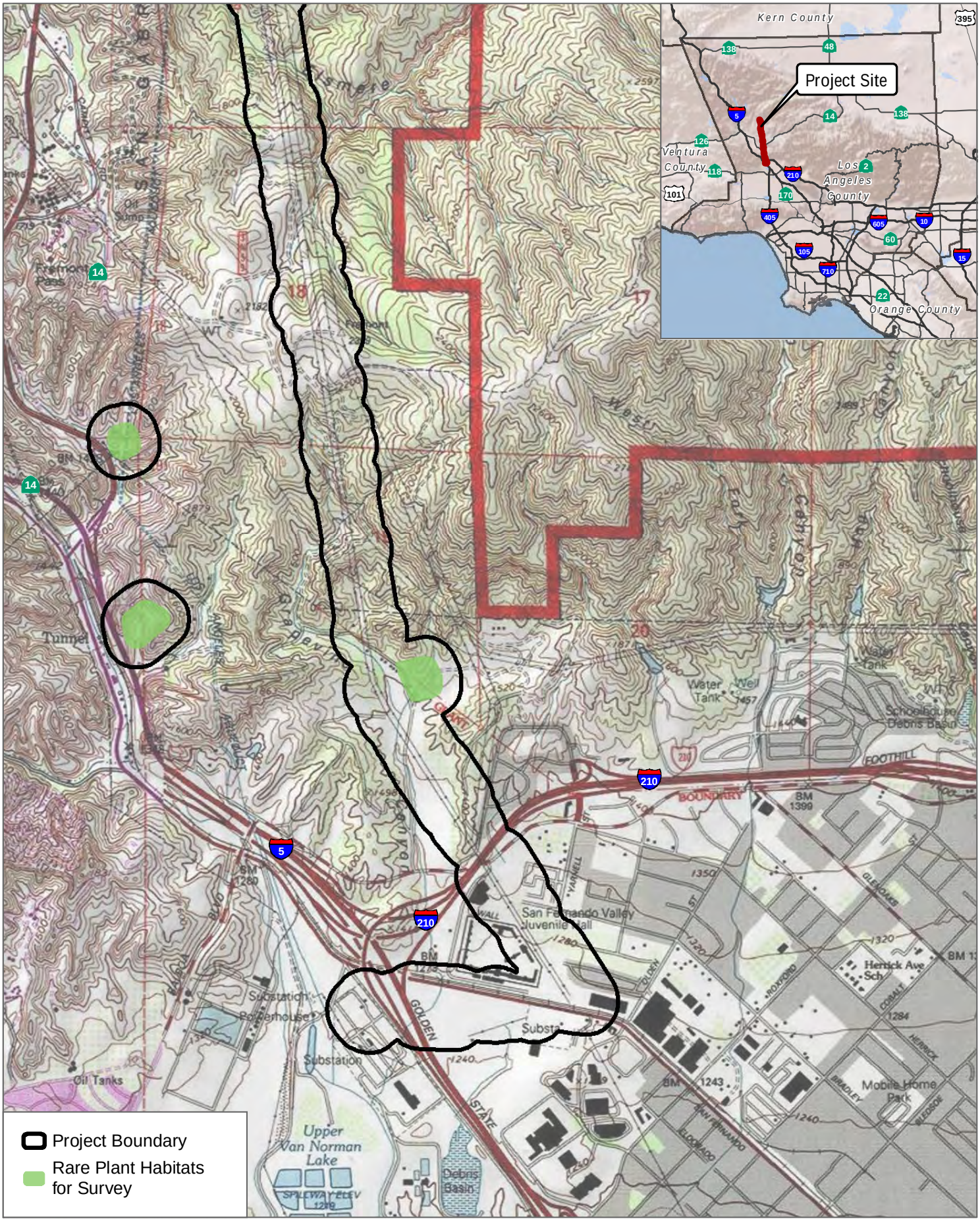
Los Angeles Department of Water & Power

0 1,000 2,000 Feet

FIGURE 1C

Project Location

LADWP PP1/PP2, 2019 Special-Status Plant Species Survey Results



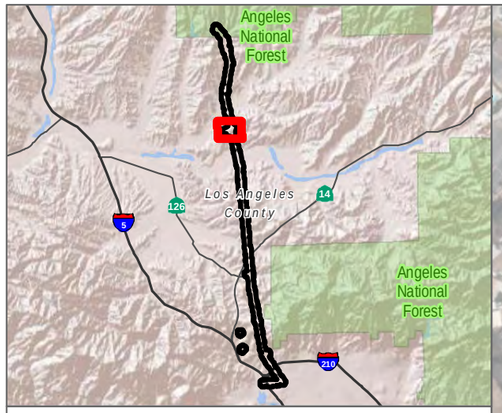
SOURCE: USGS 7.5-Minute Series Newhall, Mint Canyon, Oat Mountain, San Fernando Quadrangles

FIGURE 1D

Project Location

LADWP PP1/PP2, 2019 Special-Status Plant Species Survey Results

Los Angeles Department of Water & Power



- Project Study Area
- Rare Plant Habitats for Survey

Permanent Disturbance

- New Pole Work Area
- Helicopter Laydown

Temporary Disturbance

- Stringing Pad/Laydown Yard
- Structure Removal

Special-Status Plant Species Observations

- Catalina mariposa lily *(Calochortus catalinae)*, Calcat
- Slender mariposa lily *(Calochortus clavatus var. gracilis)*, Calclagra

SOURCE: Bing 2019

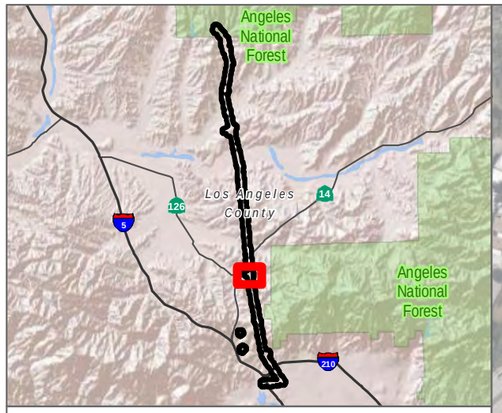
Los Angeles Department of Water & Power

0 200 400 Feet

FIGURE 2.1

Special-Status Plant Species Observations

LADWP PP1/PP2, 2019 Special-Status Plant Species Survey Results



Project Study Area

Rare Plant Habitats for Survey

Permanent Disturbance

New Pole Work Area

Helicopter Laydown

Temporary Disturbance

Stringing Pad/Laydown Yard

Structure Removal

Special-Status Plant Species Observations

Peirson's morning-glory *(Calystegia peirsonii)*, Calpei

SOURCE: Bing 2019

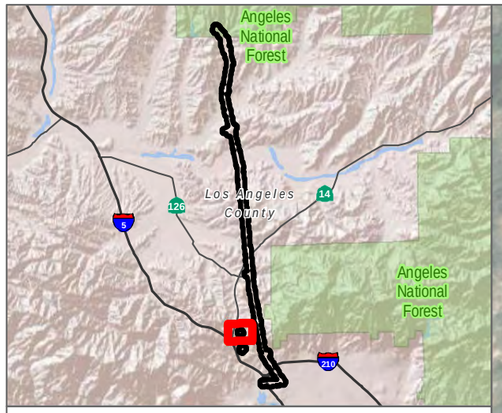
Los Angeles Department of Water & Power

0 200 400 Feet

FIGURE 2.2

Special-Status Plant Species Observations

LADWP PP1/PP2, 2019 Special-Status Plant Species Survey Results



Project Study Area

Rare Plant Habitats for Survey

Permanent Disturbance

Helicopter Laydown

SOURCE: Bing 2019

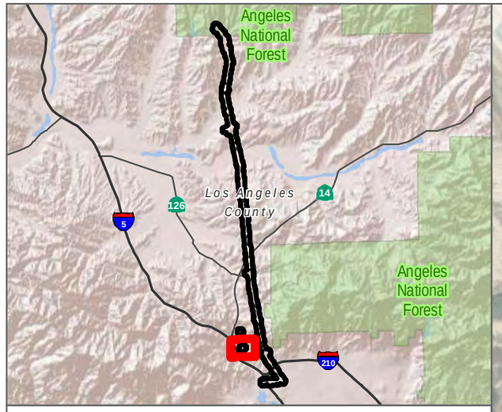
Los Angeles Department of Water & Power

0 200 400 Feet

FIGURE 2.3

Special-Status Plant Species Observations

LADWP PP1/PP2, 2019 Special-Status Plant Species Survey Results



Project Study Area

Rare Plant Habitats for Survey

Permanent Disturbance

Helicopter Laydown

SOURCE: Bing 2019

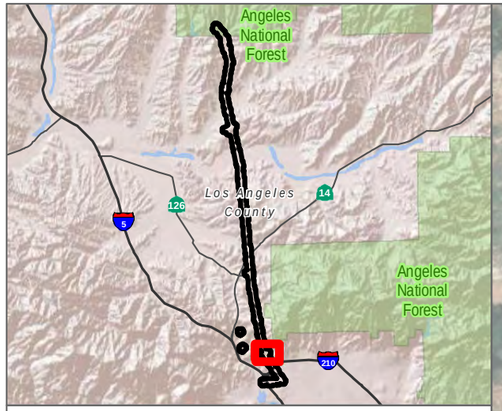
Los Angeles Department of Water & Power

0 200 400 Feet

FIGURE 2.4

Special-Status Plant Species Observations

LADWP PP1/PP2, 2019 Special-Status Plant Species Survey Results



Project Study Area

Rare Plant Habitats for Survey

Permanent Disturbance

New Pole Work Area

Helicopter Laydown

Temporary Disturbance

Stringing Pad/Laydown Yard

bing

SOURCE: Bing 2019

Los Angeles Department of Water & Power

0 200 400 Feet

FIGURE 2.5

Special-Status Plant Species Observations

LADWP PP1/PP2, 2019 Special-Status Plant Species Survey Results

Attachment B

Plant Species Compendium

EUDICOTS

VASCULAR SPECIES

ADOXACEAE—MUSKROOT FAMILY

Sambucus nigra ssp. *caerulea*—blue elderberry

AIZOACEAE—FIG-MARIGOLD FAMILY

* *Carpobrotus edulis*—hottentot fig

AMARANTHACEAE—AMARANTH FAMILY

* *Amaranthus albus*—prostrate pigweed

ANACARDIACEAE—SUMAC OR CASHEW FAMILY

Malosma laurina—laurel sumac

Rhus ovata—sugarbush

* *Schinus molle*—Peruvian peppertree

Toxicodendron diversilobum—poison oak

APOCYNACEAE—DOGBANE FAMILY

Asclepias fascicularis—Mexican whorled milkweed

Nerium oleander—oleander*

ASTERACEAE—SUNFLOWER FAMILY

Ambrosia acanthicarpa—flatspine bur ragweed

Artemisia californica—California sagebrush

Artemisia douglasiana—Douglas' sagewort

Baccharis pilularis—coyote brush

Baccharis salicifolia—mulefat

Brickellia californica—California brickellbush

* *Carduus pycnocephalus*—Italian plumeless thistle

* *Centaurea melitensis*—Maltese star-thistle

* *Centaurea solstitialis*—yellow star-thistle

Cirsium occidentale var. *occidentale*—cobwebby thistle

Corethrogyne filaginifolia—sand-aster

Deinandra fasciculata—clustered tarweed

Encelia californica—California brittle bush

Encelia farinosa—brittle bush

Ericameria linearifolia—narrowleaf goldenbush

Ericameria nauseosa—rubber rabbitbrush

* *Erigeron bonariensis*—asthmaweed

Eriophyllum confertiflorum var. *confertiflorum*—golden-yarrow

Helianthus annuus—common sunflower
Heterotheca grandiflora—telegraphweed
* *Lactuca serriola*—prickly lettuce
Lasthenia gracilis—needle goldfields
Layia platyglossa—coastal tidytips
* *Logfia gallica*—narrowleaf cottonrose
Malacothrix saxatilis var. *tenuifolia*—cliff desertdandelion
Matricaria discoidea—disc mayweed
Pseudognaphalium californicum—ladies' tobacco
* *Sonchus asper*—spiny sowthistle
* *Sonchus oleraceus*—common sowthistle
Stephanomeria exigua—small wirelettuce
Uropappus lindleyi—Lindley's silverpuffs

BORAGINACEAE—BORAGE FAMILY

Amsinckia intermedia—common fiddleneck
Amsinckia menziesii—Menzies' fiddleneck
Cryptantha angustifolia—Panamint cryptantha
Emmenanthe penduliflora—whisperingbells
Eriodictyon crassifolium var. *crassifolium*—thickleaf yerba santa
Eucrypta chrysanthemifolia var. *chrysanthemifolia*—spotted hideseed
Phacelia cicutaria var. *hispida*—caterpillar phacelia
Plagiobothrys canescens—valley popcornflower

BRASSICACEAE—MUSTARD FAMILY

* *Brassica nigra*—black mustard
* *Hirschfeldia incana*—shortpod mustard
* *Rosmarinus officinalis*—rosemary
* *Sisymbrium irio*—London rocket
* *Sisymbrium orientale*—Indian hedgemustard

CACTACEAE—CACTUS FAMILY

Opuntia basilaris var. *basilaris*—beavertail pricklypear

CHENOPODIACEAE—GOOSEFOOT FAMILY

* *Atriplex semibaccata*—Australian saltbush
* *Chenopodium album*—lambsquarters
Chenopodium californicum—California goosefoot
* *Chenopodium murale*—nettleleaf goosefoot
* *Salsola tragus*—prickly Russian thistle

CONVOLVULACEAE—MORNING-GLORY FAMILY

Calystegia macrostegia—island false bindweed
Calystegia peirsonii—Peirson's morning-glory
Cuscuta californica var. *californica*—chaparral dodder

CRASSULACEAE—STONECROP FAMILY

Crassula connata—sand pygmyweed
Dudleya saxosa ssp. *aloides*—Panamint liveforever

CUCURBITACEAE—GOURD FAMILY

Marah macrocarpa—Cucamonga manroot

EUPHORBIACEAE—SPURGE FAMILY

Croton setiger—dove weed
Euphorbia albomarginata—whitemargin sandmat
* *Ricinus communis*—castorbean

FABACEAE—LEGUME FAMILY

Acmispon glaber—deer weed
Acmispon strigosus—strigose bird's-foot trefoil
Astragalus didymocarpus—dwarf white milkvetch
Astragalus trichopodus—Santa Barbara milkvetch
Lupinus bicolor—miniature lupine
Lupinus sparsiflorus—Coulter's lupine
* *Medicago polymorpha*—burclover
* *Melilotus albus*—yellow sweetclover
* *Melilotus indicus*—annual yellow sweetclover

FAGACEAE—OAK FAMILY

Quercus agrifolia—coast live oak

GERANIACEAE—GERANIUM FAMILY

* *Erodium botrys*—longbeak stork's bill
* *Erodium cicutarium*—redstem stork's bill

GROSSULARIACEAE—GOOSEBERRY FAMILY

Ribes aureum—golden currant

LAMIACEAE—MINT FAMILY

* *Marrubium vulgare*—horehound
Salvia apiana—white sage
Salvia leucophylla—purple sage

Salvia mellifera—black sage

MALVACEAE—MALLOW FAMILY

Malacothamnus fasciculatus var. *fasciculatus*—Mendocino bushmallow

* *Malva nicaeensis*—bull mallow

* *Malva parviflora*—cheeseweed mallow

MYRSINACEAE—MYRSINE FAMILY

* *Lysimachia arvensis*—scarlet pimpernel

MYRTACEAE—MYRTLE FAMILY

* *Eucalyptus camaldulensis*—river redgum

NYCTAGINACEAE—FOUR O'CLOCK FAMILY

Mirabilis laevis var. *crassifolia*—California four o'clock

ONAGRACEAE—EVENING PRIMROSE FAMILY

Camissonia strigulosa—sandysoil suncup

Clarkia unguiculata—elegant clarkia

OROBANCHACEAE—BROOM-RAPE FAMILY

Castilleja exserta—exserted Indian paintbrush

PAPAVERACEAE—POPPY FAMILY

Eschscholzia californica—California poppy

PHRYMACEAE—LOPSEED FAMILY

Diplacus aurantiacus—bush monkeyflower

PLANTAGINACEAE—PLANTAIN FAMILY

Keckiella cordifolia—heartleaf keckiella

Plantago erecta—dwarf plantain

PLATANACEAE—PLANE TREE, SYCAMORE FAMILY

Platanus racemosa—California sycamore

POLYGONACEAE—BUCKWHEAT FAMILY

Chorizanthe staticoides—turkish rugging

Eriogonum elongatum—longstem buckwheat

Eriogonum fasciculatum—California buckwheat

* *Polygonum aviculare*—prostrate knotweed

* *Rumex crispus*—curly dock

RANUNCULACEAE—BUTTERCUP FAMILY

Delphinium parryi ssp. *parryi*—San Bernardino larkspur

RHAMNACEAE—BUCKTHORN FAMILY

Ceanothus crassifolius—hoary leaf ceanothus

ROSACEAE—ROSE FAMILY

Adenostoma fasciculatum—chamise

Cercocarpus betuloides var. *betuloides*—birchleaf mountain mahogany

Heteromeles arbutifolia—toyon

Rosa californica—California rose

SALICACEAE—WILLOW FAMILY

Populus fremontii—Fremont cottonwood

Salix exigua—sandbar willow

Salix gooddingii—black willow

Salix lasiolepis—arroyo willow

SOLANACEAE—NIGHTSHADE FAMILY

Datura wrightii—sacred thorn-apple

* *Nicotiana glauca*—tree tobacco

Solanum douglasii—greenspot nightshade

Solanum xanti—chaparral nightshade

TAMARICACEAE—TAMARISK FAMILY

* *Tamarix ramosissima*—tamarisk

VERBENACEAE—VERVAIN FAMILY

Verbena lasiostachys—western vervain

GYMNOSPERMS AND GNETOPHYTES

VASCULAR SPECIES

CUPRESSACEAE—CYPRESS FAMILY

Juniperus californica—California juniper

PINACEAE—PINE FAMILY

* *Pinus pinea*—Italian stone pine

MONOCOTS

VASCULAR SPECIES

AGAVACEAE—AGAVE FAMILY

Hesperoyucca whipplei—chaparral yucca

LILIACEAE—LILY FAMILY

Calochortus catalinae—Catalina mariposa lily
Calochortus clavatus var. *gracilis*—slender mariposa lily
Calochortus venustus—butterfly mariposa lily

POACEAE—GRASS FAMILY

* *Avena barbata*—slender oat
* *Bromus diandrus*—ripgut brome
* *Bromus hordeaceus*—soft brome
* *Bromus madritensis*—compact brome
* *Cynodon dactylon*—Bermudagrass
Elymus condensatus—giant wild rye
* *Festuca myuros*—rat-tail fescue
* *Hordeum murinum*—mouse barley
* *Lamarckia aurea*—goldentop grass
Melica imperfecta—smallflower melicgrass
* *Pennisetum setaceum*—fountain grass
* *Polypogon monspeliensis*—annual rabbitsfoot grass
* *Schismus barbatus*—common Mediterranean grass
* *Stipa miliacea*—no common name
Stipa pulchra—purple needlegrass

THEMIDACEAE—BRODIAEA FAMILY

Bloomeria crocea var. *crocea*—common goldenstar
Dichelostemma capitatum—bluedicks

* signifies introduced (non-native) species