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Initial Study/Mitigated Negative Declaration

# **Adelanto - Rinaldi Line 1 Upgrade Project**

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*Prepared by:*

**LOS ANGELES DEPARTMENT OF WATER AND POWER**

Corporate Environmental Affairs  
Environmental Planning and Assessment  
111 North Hope Street, Room 1044  
Los Angeles, California 90012

*With assistance from:*

**DUDEK**

225 South Lake Avenue  
Suite M210  
Pasadena, California 91101



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# Acronyms and Abbreviations

| Acronym/Abbreviation | Definition                                         |
|----------------------|----------------------------------------------------|
| AB                   | Assembly Bill                                      |
| ADL-RIN L1           | Adelanto-Rinaldi Line 1                            |
| AGL                  | above ground level                                 |
| amsl                 | above mean sea level                               |
| AQMP                 | Air Quality Management Plan                        |
| AUF                  | acoustical usage factor                            |
| AVAQMD               | Antelope Valley Air Quality Management District    |
| BMP                  | Best Management Practice                           |
| BSA                  | Biological Survey Area                             |
| CAAQS                | California Ambient Air Quality Standards           |
| CalEEMod             | California Emissions Estimator Model               |
| Caltrans             | California Department of Transportation            |
| CARB                 | California Air Resources Board                     |
| CDFW                 | California Department of Fish and Wildlife         |
| CESA                 | California Endangered Species Act                  |
| CEQA                 | California Environmental Quality Act               |
| CH <sub>4</sub>      | methane                                            |
| CHRIS                | California Historical Resources Information System |
| CNDDB                | California Natural Diversity Database              |
| CNRA                 | California Natural Resource Agency                 |
| CO                   | carbon monoxide                                    |
| CO <sub>2</sub>      | carbon dioxide                                     |
| CO <sub>2e</sub>     | carbon dioxide equivalent                          |
| CPUC                 | California Public Utilities Commission             |
| CRHR                 | California Register of Historical Resources        |
| EIA                  | U.S. Energy Information Administration             |
| EIR                  | Environmental Impact Report                        |
| EPA                  | U.S. Environmental Protection Agency               |
| FAA                  | Federal Aviation Administration                    |
| FHWA                 | Federal Highway Administration                     |
| FMMP                 | Farmland Mapping and Monitoring Program            |
| FTBMI                | Fernandeno Tataviam Band of Mission Indians        |
| GHG                  | greenhouse gas                                     |
| GO 95                | General Order 95                                   |
| GWP                  | global warming potential                           |
| HCP                  | habitat conservation plan                          |
| I                    | Interstate                                         |
| ips                  | inches per second                                  |
| IS                   | Initial Study                                      |
| kV                   | kilovolt                                           |

| Acronym/Abbreviation | Definition                                                                                      |
|----------------------|-------------------------------------------------------------------------------------------------|
| LADOT                | Los Angeles Department of Transportation                                                        |
| LADWP                | Los Angeles Department of Water and Power                                                       |
| LCI                  | State of California Office of Land Use and Climate Innovation                                   |
| $L_{eq}$             | energy equivalent sound level                                                                   |
| $L_{max}$            | maximum sound level recorded during the measurement interval                                    |
| MBTA                 | Migratory Bird Treaty Act                                                                       |
| MDAB                 | Mojave Desert Air Basin                                                                         |
| MLD                  | Most Likely Descendent                                                                          |
| MM                   | mitigation measure                                                                              |
| MND                  | Mitigated Negative Declaration                                                                  |
| MT                   | metric ton                                                                                      |
| mya                  | million years ago                                                                               |
| $N_2O$               | nitrous oxide                                                                                   |
| NAAQS                | National Ambient Air Quality Standards                                                          |
| NAHC                 | Native American Heritage Commission                                                             |
| NCCP                 | natural community conservation plan                                                             |
| NERC                 | North American Electric Reliability Corporation                                                 |
| NETR                 | Nationwide Environmental Title Research, LLC                                                    |
| NHMLA/LACM           | Natural History Museum of Los Angeles County                                                    |
| $NO_2$               | nitrogen dioxide                                                                                |
| $NO_x$               | oxides of nitrogen                                                                              |
| NPDES                | National Pollutant Discharge Elimination System                                                 |
| $O_3$                | ozone                                                                                           |
| OPR                  | State of California Office of Planning and Research                                             |
| PCM                  | Power System Construction and Maintenance                                                       |
| $PM_{10}$            | particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter) |
| $PM_{2.5}$           | particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter)  |
| PPV                  | peak particle velocity                                                                          |
| PRC                  | Public Resources Code                                                                           |
| QSD                  | Qualified Storm Water Developer                                                                 |
| QSP                  | Qualified Storm Water Practitioner                                                              |
| RACT SIP             | Reasonably Available Control Technology - State Implementation Plan                             |
| RCNM                 | Roadway Construction Noise Model                                                                |
| ROW                  | right-of-way                                                                                    |
| RPS                  | Renewable Portfolio Standard                                                                    |
| RTP/SCS              | Regional Transportation Plan/Sustainable Communities Strategy                                   |
| RWQCB                | Regional Water Quality Control Board                                                            |
| SBCM                 | San Bernardino County Museum                                                                    |
| SCAB                 | South Coast Air Basin                                                                           |
| SCAG                 | Southern California Association of Governments                                                  |
| SCAQMD               | South Coast Air Quality Management District                                                     |
| SCCIC                | South Central Coastal Information Center                                                        |

| Acronym/Abbreviation | Definition                                      |
|----------------------|-------------------------------------------------|
| SEA                  | Significant Ecological Area                     |
| SLF                  | Sacred Lands File                               |
| SO <sub>2</sub>      | sulfur dioxide                                  |
| SO <sub>x</sub>      | oxides of sulfur                                |
| SR                   | State Route                                     |
| SVP                  | Society of Vertebrate Paleontology              |
| SWPPP                | Storm Water Pollution Prevention Plan           |
| SWRCB                | State Water Resources Control Board             |
| TCM                  | Transmission Construction and Maintenance       |
| TCR                  | tribal cultural resource                        |
| UCMP                 | University of California Museum of Paleontology |
| USGS                 | U.S. Geological Survey                          |
| VMT                  | vehicle miles traveled                          |
| VOC                  | volatile organic compound                       |
| YSMN                 | Yuhaaviatam of San Manuel Nation                |

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# 1 Introduction

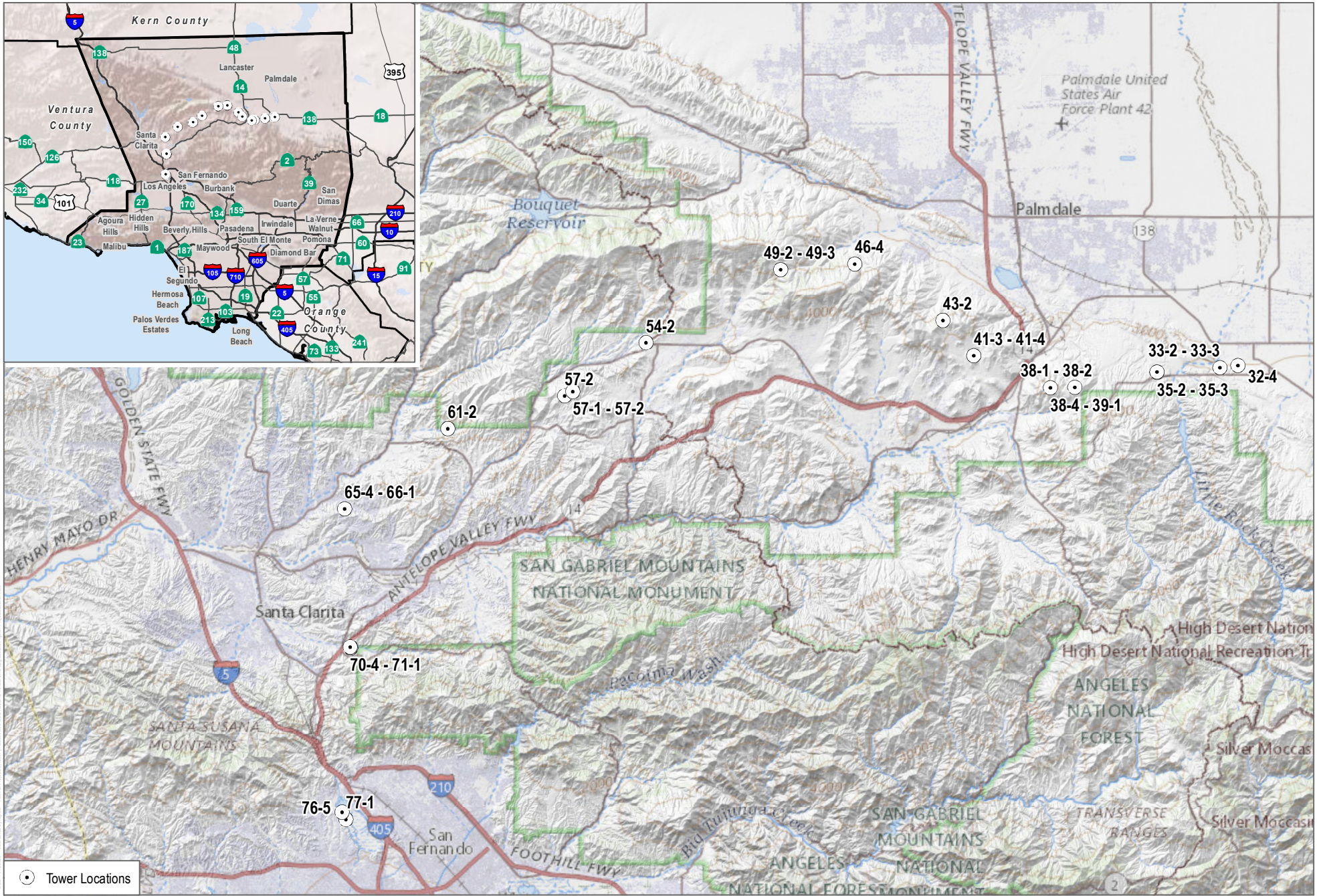
## 1.1 Project Overview

The Los Angeles Department of Water and Power (LADWP) is proposing the Adelanto-Rinaldi Line 1 Upgrade Project (proposed project), which involves ampacity upgrades of the Adelanto – Rinaldi Line 1 (ADL-RIN L1) transmission line to increase its capacity from its current rating of 500 kV at 1593A/1593A (continuous/emergency) to approximately 500 kV at 1680A/1965A. The ampacity upgrade requires ground clearance grading and tower raises in order to be compliant with transmission line safety and reliability standards. The location of the proposed project is along one existing 500 kilovolt (kV) overhead transmission line (ADL-RIN L1) located in the northern portion of Los Angeles County.

The proposed project would be required to comply with the California Public Utilities Commission’s (CPUC) General Order 95 (GO 95) Clearance Code Requirements as mandated by the North American Electric Reliability Corporation (NERC). The specific clearance requirements set by General Order 95 (GO 95) are included in Appendix A. Achieving this height consistency is necessary to ensure the distance between the transmission line conductors and the ground or road surface below is sufficient to meet code requirements guiding the safe and reliable operation of transmission lines. LADWP proposes to comply with the code clearances by grading the ground surface of the area underneath the transmission lines at nine work areas to achieve height consistency per NERC requirements. Additionally, LADWP has identified eight locations where towers would be raised by approximately 10 to 20 feet in order to achieve height consistency.

The total acreage of grading would be approximately 3.74 acres, and the total acreage of tower raising activities would be an additional 1.44 acres. The project, as proposed, would also involve improvements to portions of existing access roads to be used for site access, equipment staging and storage, and distribution of excavated soils. The project would primarily be located on LADWP fee-owned property. Figure 1 shows an overview of the project location.

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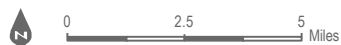


SOURCE: LADWP; County of Los Angeles; Open Street Map; USGS National Basemap

FIGURE 1

Project Location

LADWP Adelanto-Rinaldi Line Upgrade Project



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## 1.2 California Environmental Quality Act

As the lead local agency for the proposed project under the California Environmental Quality Act (CEQA), LADWP must complete an environmental review in accordance with CEQA to determine if implementation of the proposed project would result in significant adverse environmental impacts. CEQA applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed project constitutes a project as defined by CEQA. CEQA Guidelines Section 15367 states that a “Lead Agency” is “the public agency which has the principal responsibility for carrying out or approving a project.” Therefore, LADWP is the lead agency responsible for compliance with CEQA for the proposed project.

As the lead agency, LADWP has prepared an Initial Study in accordance with the CEQA Guidelines. The purpose of the Initial Study is to evaluate potential environmental impacts and to determine whether an Environmental Impact Report (EIR) or a Negative Declaration or Mitigated Negative Declaration (MND) should be prepared for the proposed project. The Initial Study has also been prepared to satisfy CEQA requirements of agencies that would provide sources of funding for the proposed project or that would otherwise have discretionary approval authority over the project. An MND is prepared for a project when an Initial Study has identified potentially significant impacts on the environment, but (1) revisions in the project plans or proposals before the proposed Negative Declaration and Initial Study are released for public review would avoid the impacts or mitigate the impacts to a point where clearly no significant effect on the environment would occur; and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

The Initial Study (IS) determined that the implementation of the proposed project could cause some potentially significant impacts on the environment but, as shown in the environmental analysis contained in this IS/MND, all of the project’s potentially significant impacts would be reduced to less-than-significant levels through the implementation of mitigation measures. Consequently, the analysis contained herein concludes that an MND shall be prepared for the proposed project.

### Organization of the Initial Study/Mitigated Negative Declaration

This document consists of both the Initial Study for the project and the Mitigated Negative Declaration (IS/MND). This IS/MND is composed of four sections. Section 1 provides the introduction for the proposed project, general information about the contents of the IS/MND, information about the lead agency, the project location, and the environmental setting. Section 2 provides a description of the proposed project components and information about their construction and operation. Section 3 consists of the CEQA Initial Study checklist, which provides the assessment of potential environmental impacts and the applicability of mitigation measures to reduce potentially significant impacts to less than significant. Section 4 provides references consulted and a list of the lead agency staff and consultants involved in preparing the environmental review documents for the proposed project. This document also includes several appendices that contain technical resource reports related to air quality and greenhouse gas (GHG) emissions, biological resources, jurisdictional delineations, and cultural resources.

## 1.3 Project Location

The proposed project is scattered along the Adelanto-Rinaldi transmission line, extending between the San Fernando Valley of the City of Los Angeles and the southern extent of the Antelope Valley. The closest and furthest work locations range between 18 and 45 miles from the Pacific Ocean. The proposed project occurs within the northern half of Los Angeles County and generally straddles the Transverse Ranges through the Santa Clara River

Valley, Soledad Canyon, and Sierra Pelona Mountains. The tower numbering uses mileage from the source of the energy feed. For example, Tower 76-5 represents the fifth tower of the 76th mile of the transmission line. The most southwestern work locations (Towers 76-5 and 77-1) are located within the San Fernando Valley in undulating hilly terrain around the basin of LADWP’s Van Norman Complex. The work locations within the Santa Clara River Valley (Tower Span 70-4 to 71-1, Tower Span 65-4 to 66-1, and Tower 61-2) are characterized by moderately steep slopes in hilly terrain. Work locations within Soledad Canyon and the Sierra Pelona Mountains (Tower 57-2, Tower Span 57-1 to 57-2, Tower 54-2, Tower Span 49-2 to 49-3, Tower 46-4, Tower 43-2, Tower Span 41-3 to 41-4, Tower Span 38-4 to 39-1, and Tower Span 38-1 to 38-2) range in moderate to very steep slopes set in mountainous terrain. In the portion of the project that occurs along the southern extent of the Antelope Valley (Tower Span 35-2 to 35-3, Tower Span 33-2 to 33-3, and Tower 32-4), the terrain is generally gently sloping with a few scattered hills. Elevations within the proposed project footprint range from approximately 1,155 above mean sea level (amsl) at the Van Norman Complex to approximately 4,270 amsl in the Sierra Pelona portion of the transmission line.

Almost all work locations are situated in unincorporated Los Angeles County with the exception of Tower Span 65-4 to 66-1, which occurs within the City of Santa Clarita, and Towers 76-5 and 77-1, which occur within the City of Los Angeles. Table 1-1 lists the five segments and the USGS quadrangle(s) traversed by each segment (southwest to northeast).

**Table 1-1. USGS Quadrangles**

| Segment | Quadrangle(s)               | Towers and Spans                                                                                                   |
|---------|-----------------------------|--------------------------------------------------------------------------------------------------------------------|
| 1       | San Fernando                | Towers 76-5 and 77-1                                                                                               |
| 2       | Mint Canyon                 | Tower Span 70-4 to 71-1, Tower Span 65-4 to 66-1, and Tower 61-2                                                   |
| 3       | Sleep Valley and Agua Dulce | Tower 57-2, Tower Span 57-1 to 57-2, and Tower 54-2                                                                |
| 4       | Ritter Ridge                | Tower Span 49-2 to 49-3, Tower 46-4, Tower 43-2, and Tower Span 41-3 to 41-4                                       |
| 5       | Littlerock and Palmdale     | Tower Span 38-4 to 39-1, Tower Span 38-1 to 38-2, Tower Span 35-2 to 35-3, Tower Span 33-2 to 33-3, and Tower 32-4 |

**Right-of-Way**

Grading activities would be carried out within LADWP fee-owned land or within the existing rights-of-way (ROW) granted to LADWP. The ROW width of the transmission corridor containing ADL-RIN L1 is approximately 320 feet.

**Surrounding Land Uses**

The land surrounding the proposed work areas consist primarily of undeveloped open space areas. Some development occurs within the vicinity, generally consisting of scattered rural residences, and agricultural land. Several of the work areas furthest to the west are located in areas with higher residential density and more development.

**Land Ownership**

The work areas are located on land owned by several property owners, both public and private, but the majority of the work areas are on fee-owned land by LADWP (see Table 2-2).

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## 2 Project Description

The Los Angeles Department of Water and Power (LADWP) is proposing the Adelanto–Rinaldi Line 1 Upgrade Project (proposed project), which involves ampacity upgrades of the Adelanto – Rinaldi Line 1 (ADL-RIN L1) transmission line. The ampacity upgrade requires ground clearance grading and tower raises in order to be compliant with transmission line safety and reliability standards. The location of the proposed project is along one existing 500 kilovolt (kV) overhead transmission line (ADL-RIN L1) located in the northern portion of Los Angeles County. The specific clearance requirements set by GO 95 Clearance Code Requirements as mandated by the NERC are included in Appendix A. Achieving this height consistency is necessary to ensure the distance between the transmission line conductors and the ground or road surface below is sufficient to meet code requirements guiding the safe and reliable operation of transmission lines.

### 2.1 Proposed Project

The proposed project involves grading activities and tower raises at 17 work areas along the existing ADL-RIN L1 transmission lines (nine underline grading activities and eight tower raises). The proposed project also entails improvements to portions of existing access roads slated for site access uses, equipment staging and storage, and distribution of excavated soils. Table 2-1 summarizes the activities involved with the proposed project, and Table 2-2 details the amount of grading that would occur at each work area. The work areas are categorized in Table 2-2 based on the work area located furthest east and then moves to the work area furthest to the west.

An overview of the project location is shown in Figure 1. Construction would occur sequentially along the transmission line corridor and is anticipated to take up to 2.5 years (with 270 workdays), depending on weather conditions, site access, and the availability of personnel and equipment. Once construction is complete, operation activities would be minimal and limited to routine operations and maintenance inspections as are currently carried out on the existing line.

**Table 2-1. Summary of Proposed Project**

|                                                |                          |
|------------------------------------------------|--------------------------|
| <b>Lines Affected</b>                          | Adelanto-Rinaldi Line 1  |
| <b>Number of Work Areas</b>                    | 17                       |
| <b>Total Acres of Grading</b>                  | approximately 3.74 acres |
| <b>Total Acres of Tower Raising Work Areas</b> | approximately 1.44 acres |
| <b>Average Depth of Excavation</b>             | 2.2 feet                 |
| <b>Total Volume of Excavated Soils</b>         | 1,690 cubic yards        |

**Table 2-2. Estimated Limits of Grading (Work Areas)**

| Tower Number or Tower Spans (ADL-RIN L1) | Activity              | Max. Width (ft.) | Max. Length (ft.) | Max. Depth (ft.) | Area (sq. ft.) | Cut and Fill (Cubic Yards)             | Access Road Improvement Required? | Land Ownership                        |
|------------------------------------------|-----------------------|------------------|-------------------|------------------|----------------|----------------------------------------|-----------------------------------|---------------------------------------|
| 32-4                                     | Tower Raise (10 Feet) | 50-foot radius   |                   | N/A              | 7,854          | N/A                                    | No                                | LACPW                                 |
| 33-2 to 33-3                             | Ground Clearance      | 16.1             | 19.4              | 2                | 435.6          | Cut: 11.3                              | No                                | Little Rock Creek Irrigation District |
| 35-2 to 35-3                             | Ground Clearance      | 101.6            | 126.6             | 3.0              | 13,068         | Cut: 234.8<br>Fill: 234.8              | Yes                               | LADWP Fee-Owned                       |
| 38-1 to 38-2                             | Ground Clearance      | 27.7             | 82.4              | 5                | 2,178          | Cut: 161.1<br>Fill: 161.1              | Yes                               | LADWP Fee-Owned                       |
| 38-4 to 39-1                             | Ground Clearance      | 21.4             | 40.7              | 1                | 871.2          | Cut: 26.2<br>Fill: 26.2                | Yes                               | Cox Communications (Sprint)           |
| 41-3 to 41-4                             | Ground Clearance      | 24.4             | 43.4              | 1                | 871.2          | Cut: 10.8<br>Fill: 13.7<br>Export: 2.8 | Yes                               | LADWP Fee-Owned                       |
| 43-2                                     | Tower Raise (10 feet) | 50-foot radius   |                   | N/A              | 7,854          | N/A                                    | No                                | Southern California Edison            |
| 46-4                                     | Tower Raise (10 feet) | 50-foot radius   |                   | N/A              | 7,854          | N/A                                    | No                                | Private Ownership                     |
| 49-2 to 49-3                             | Ground Clearance      | 48.6             | 39.2              | 1                | 1,742.4        | Cut: 61.6                              | Yes                               | LACPW                                 |
| 54-2                                     | Tower Raise (10 feet) | 50-foot radius   |                   | N/A              | 7,854          | N/A                                    | No                                | LACPW                                 |
| 57-1 to 57-2                             | Ground Clearance      | 26.7             | 30.7              | 2                | 871.2          | Cut: 26.3                              | Yes                               | Private Ownership                     |

**Table 2-2. Estimated Limits of Grading (Work Areas)**

| Tower Number or Tower Spans (ADL-RIN L1) | Activity                                   | Max. Width (ft.) | Max. Length (ft.) | Max. Depth (ft.) | Area (sq. ft.) | Cut and Fill (Cubic Yards)                 | Access Road Improvement Required? | Land Ownership             |
|------------------------------------------|--------------------------------------------|------------------|-------------------|------------------|----------------|--------------------------------------------|-----------------------------------|----------------------------|
| 57-2                                     | Tower Raise (10 feet)                      | 50-foot radius   |                   | N/A              | 7,854          | N/A                                        | No                                | Private Ownership          |
| 61-2                                     | Tower Raise (20 feet)                      | 50-foot radius   |                   | N/A              | 7,854          | N/A                                        | No                                | LADWP Fee-Owned            |
| 65-4 to 66-1                             | Ground Clearance                           | 42.3             | 58.6              | 3                | 2,613.6        | Cut: 104.6<br>Fill: 104.6                  | Yes                               | LADWP Fee-Owned            |
| 70-4 to 71-1                             | Ground Clearance                           | 213.7            | 432.9             | 1                | 33,976.8       | Cut: 282.8<br>Fill: 155.2<br>Export: 127.6 | Yes                               | Santa Clarita Public Works |
| 76-5                                     | Tower Raise (10 feet)                      | 50-foot radius   |                   | N/A              | 7,854          | N/A                                        | No                                | LADWP Fee-Owned            |
| 77-1                                     | Ground Clearance and Tower Raise (10 feet) | 235.8            | 329.1             | N/A              | 77,536.8       | Cut: 770.6<br>Fill: 770.6                  | Yes                               | LADWP Fee-Owned            |

## 2.2 Construction

Construction activities would occur sequentially along the transmission line corridor and would take up to 9 months to complete, assuming 270 workdays per year in the span of 2.5 years. Construction at each individual site would last an average of 20 to 30 workdays, with some sites requiring less than 20 days and some sites requiring up to 30 days, depending on the amount of grading and the conditions at the site. The estimated work force for grading operations is between 4 to 6 workers per day. When feasible, this work force would be split into two crews of 2–3 each to allow for work to occur on two grading sites simultaneously. Tower raising activities are expected to require a larger workforce, which is estimated at 12 to 24 workers per site. Tower raising activities would take approximately 7 days per tower, for a total of 56 days of tower raising activities. Construction activities would be conducted during the hours of 7:00 a.m. to 6:00 p.m. and would not occur on Sundays or holidays.

Details regarding the access roads, grading process, tower raising process, and work force requirements are provided below. The Best Management Practices (BMPs) detailed would be used to minimize the risk of potential impacts during construction and would be communicated to employees prior to the start of work during worker environmental awareness training. Safety requirements and procedures for construction are provided in the LADWP Power Distribution safety rulebook.

### Access Roads

Access to the proposed work areas would use existing access roads to the extent feasible. Where access to the proposed work areas is not possible via the existing roads, overland travel would be limited to areas within the defined project limits as well as in select previously disturbed areas identified as non-sensitive by LADWP's biological and cultural resources specialists. Overland travel would be required on approximately 6 of the 17 work sites and would total approximately 1,501 linear feet. Where appropriate, access to the ROW would be controlled through the use of proper signage, flagging, and monitoring as needed. Access outside of LADWP fee-owned property could require permits or license with outside private parties or governmental agencies.

### Grading/Ground Clearing Process

Grading activities would be carried out within the LADWP ROW to achieve height consistency and would include the staking of grading limits, clearing and grubbing, grading, and site restoration. Grading/ground clearing would occur between the following nine spans: 33-2 to 33-3; 35-2 to 35-3; 38-1 to 38-2; 38-4 to 39-1; 41-3 to 41-4; 49-2 to 49-3; 57-1 to 57-2; 65-4 to 66-1; and 70-4 to 71-1. Prior to the start of grading, each site would have cut and fill stakes and construction perimeter stakes set. Construction equipment to be used for grading would include motor graders, bulldozers, excavators, compact skid-steer loaders, dump trucks, water trucks, wheel/track loaders, backhoe loaders, jackhammers, and various small utility vehicles. The construction equipment would be staged within the confines of existing roadways and turnouts. Temporary storage of excavated soils would occur within the project limits in select previously disturbed areas identified in coordination amongst LADWP and its Qualified Storm Water Developer (QSD), Qualified Storm Water Practitioner (QSP), and biological and cultural resources specialists and in accordance with any Storm Water Pollution Prevention Plan (SWPPP) requirements and CEQA mitigation requirements. Vegetation and topsoil within the impact areas would be salvaged and stockpiled for post-construction restoration efforts, and excavated soils accumulated during grading activities would then be spread within the existing access roads and along existing LADWP fee-owned transmission line right-of-way (ROW) corridor. The excavated soils would be used to repair ruts and potholes and to improve the overall state of the access roads. Spreading activities for excavated soils occurring outside of existing roads or work areas would occur in previously

disturbed areas to the extent feasible and would be implemented in accordance with all relevant SWPPP requirements and CEQA mitigation requirements for biological and archaeological resources. It is not anticipated that any excavated soils would be hauled off site.

### **Tower Raising Process**

The eight towers that are proposed for raising are towers 32-4, 43-2, 46-4, 54-2, 57-2, 61-2, 76-5, and 77-1. To achieve the required conductor-to-ground clearances, the existing free-standing lattice steel towers would be modified in a manner that increases clearance distances (10 feet increase in height for all towers, with exception of one tower to be raised 20 feet). The existing towers are 110 feet tall, as measured from the ground wire peaks to grade.

Tower raising activities would consist of preparing pads for construction equipment, conductor offset adjustments, and site cleanup and restoration. Staging areas would accommodate the construction crew trucks, forklifts, and man lifts needed to raise the towers. Other equipment involved would include backhoe loaders, water trucks, and various small utility vehicles. Based on an estimated 50 foot-radius needed to accommodate the construction equipment and work crews at each of the tower raise locations, the total area of disturbance for tower raising would be approximately 1.44 acres. For activities taking place in work areas not owned by LADWP, any approvals necessary would be obtained prior to work commencing.

The tower raising would be accomplished by placing hydraulic systems inside the tower body and adding extensions within the body of the towers by the addition of tower steel inside the of the tower body, which would be held in place by a large hydraulic system the raised towers would be approximately 120–130 feet tall. Reinforced or new tower footings may be installed at each tower raising site. Towers and tower footings would be installed on or slightly offset from the existing footprint of the tower prior to tower raising activities and would be on the centerline of the existing conductors. After the tower has been raised, conductor offset adjustments may be required and would entail small adjustments to the conductor lengths that would be carried out by technicians in large man lifts. Tower raising utilizing a hydraulic lift system is expected to stay within the confines of the current disturbed areas. The construction pads would also be returned to the sites' original condition to the extent feasible. This process would take approximately 7 days per site and would require approximately 12 to 24 workers.

Helicopter use may be required to access two tower sites, Tower 43-2 and Tower 46-4, where the terrain is steep or access is limited. The use of a helicopter for delivery of tower raising materials would eliminate the need for rehabilitating access roads to structure locations where terrain is steep and would therefore minimize land disturbance associated with crane pads, structure laydown areas, and the trucks and tractors used for delivery of structures to sites.

### **Best Management Practices**

The following best management practices (BMPs) will be implemented by LADWP and contractors as a part of the project implementation.

### **Stormwater Pollution Prevention Plan**

Compliance with the Construction General Permit requires that a Stormwater Pollution Prevention Plan (SWPPP) be developed and implemented by qualified individuals, as defined by the State Water Resources Control Board (SWRCB). The SWPPP will include BMPs for preventing water quality degradation, identifying stormwater collection

and discharge points, and maintaining drainage patterns across the project area. The exact type and location of SWPPP BMPs within the construction site would be based on site-specific conditions and receiving water risk. At a minimum, SWPPP BMPs would include erosion controls (e.g., mulches, soil binders, erosion control blankets/mats, outlet projection/energy dissipation devices), sediment controls (e.g., silt fences, fiber rolls, gravel bags), tracking controls (e.g., stabilized construction entrance/exit, entrance/outlet tire wash), wind erosion controls, non-stormwater management, and materials and water management (cleanup and containment of trash and debris, stockpile management, spill prevention and control, hazardous waste management). Implementation of these SWPPP BMPs would protect water quality due to construction-induced erosion and sedimentation within the project alignment.

### Pre-Construction Nesting Bird Surveys and Avoidance

Project construction will be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code to protect active bird/raptor nests. If feasible, vegetation removal will occur outside of the breeding season for nesting birds (September 1 through January 31) to avoid impacts to nesting birds and raptors. If construction activities occur during the avian breeding season (February 1 through August 31), a pre-construction nesting bird survey of the project site and within 500 feet of all impact areas will be conducted to determine the presence/absence of breeding birds and active nests. The nesting bird survey will be performed by a qualified biologist within 72 hours prior to the start of construction in accordance with the MBTA and California Fish and Game Code Sections 3503, 3503.5, and 3513.

If the biologist does not find any active nests within 500 feet of the impact areas, the vegetation clearing/construction work can proceed. If an active bird nest is found, the nest will be flagged and mapped on the construction plans along with an appropriate buffer established around the nest as determined by the biologist based on the species' sensitivity to disturbance. The nest area will be avoided until the nest is vacated and/or the juveniles have fledged. On-site nest monitoring will be conducted when construction occurs in close proximity to an active nest buffer. No project activities will encroach into established buffers without the consent of a monitoring biologist. The buffer will remain in place until it is determined the nestlings have fledged and the nest is no longer considered active.

### Post-Construction Activities

#### Work Area Restoration

Site restoration activities would be undertaken to return the construction areas to their original condition. Areas where grubbing, grading, or other ground disturbance activities are proposed to occur would be restored back to the original state with native vegetation following construction, with the exception of areas where adequate access and clearance needs to be maintained. A restoration plan would be prepared by a qualified restoration ecologist with experience restoring California desert and mountain ecosystems. Restoration efforts would be performed by LADWP and/or its contractors with guidance from a qualified restoration specialist and would be monitored by a qualified biologist. The final grading plan would be prepared by the Qualified Storm Water Developer (QSD). Prior to grading or site disturbance, vegetation and topsoil (including desert crust/varnish) within the impact areas would be salvaged. The upper layer of desert varnish (cobble and soil crust), consisting of approximately 2–6 inches, would be stockpiled. Any excavated soils that would be stored in excess of 48 hours would be covered by an anchored tarp and/or watered down until the site is ready for the soil to be replaced. Native vegetation would be salvaged and stored. To minimize mortality, native plants would be stored by burying the root and lower stems of the salvaged plants in native soil and watering once per week, if feasible (e.g., by water truck). Following

construction, the desert varnish material and salvaged plant materials would be replanted within the impact areas. Prior to installing the top layer of desert crust, a commercially obtained native seed mix adapted to local site conditions may be applied. Soil dominated by non-native plants would not be salvaged or re-applied. Water would be supplied as necessary for plant establishment only. Note that initial restoration efforts, such as replacing the top layer of desert crust, would occur as part of the construction periods identified above at each work site. However, follow-up work may occur at each site after construction to complete any necessary restoration work.

### Operations and Maintenance

ADL-RIN L1 is regularly inspected via helicopter and by ground using existing access roads. These inspections provide an opportunity to assess the state of the transmission line conductors, towers, and access roads. Occasionally, severe weather events such as flash flooding caused by heavy rains will prompt an inspection of sections of the transmission line that may have been impacted.

## 2.3 Approvals Required for the Project

As previously stated, the proposed project would be undertaken to comply with CPUC GO 95 Clearance Code Requirements as mandated by the NERC. The following state, and local permits are anticipated to be required for the project:

- Approval by Los Angeles Department of Water and Power Board of Commissioners
- Los Angeles County Grading Permit (where applicable)
- National Pollutant Discharge Elimination System (NPDES) Water Pollution Control Permit
- State Water Resources Control Board Section 402 Storm Water Permit Associated with Construction Activities
- Regional Water Quality Control Board Section 401 Water Quality Certification and Waste Discharge Requirements
- California Department of Fish and Wildlife Section 1602 Notification of Lake or Streambed Alteration
- U.S. Army Corps of Engineers Section 404 Nationwide Permit

Construction would be completed in compliance with the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002). Per the General Permit, a Stormwater Pollution Prevention Plan (SWPPP) incorporating BMPs for erosion control would be developed and implemented during Project construction.

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# 3 Initial Study Checklist

The following discussion of potential environmental impacts was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines to determine if the proposed project may have a significant effect on the environment.

**1. Project title:**

Adelanto-Rinaldi Line 1 Upgrade Project

**2. Lead agency name and address:**

Los Angeles Department of Water and Power  
Corporate Environmental Affairs  
Environmental Planning and Assessment  
111 North Hope Street, Room 1044  
Los Angeles, California 90012

**3. Contact person and phone number:**

Jazmin Martin  
Corporate Environmental Affairs  
Environmental Planning and Assessment  
Los Angeles Department of Water and Power  
213.367.1768

**4. Project location:**

The proposed project is scattered along the Adelanto-Rinaldi transmission line, extending between the San Fernando Valley of the City of Los Angeles and the southern extent of the Antelope Valley. The proposed project occurs within the northern half of Los Angeles County, and generally straddles the Transverse Ranges through the Santa Clara River Valley, Soledad Canyon, and Sierra Pelona Mountains.

**5. Project sponsor's name and address:**

Los Angeles Department of Water and Power  
111 North Hope Street  
Los Angeles, California 90012

**6. General plan designation:**

RL20 (Rural Land), N1 (Non-Urban), and OS-C (Open Space/Conservation).

**7. Zoning:**

Light Agriculture, Heavy Agriculture, and Open Space.

**8. Description of project:**

The proposed project involves grading activities and tower raises at 17 work areas along the existing ADL-RIN L1 transmission lines (nine underline grading activities and eight tower raises). The proposed project also entails improvements to portions of existing access roads slated for site access uses, equipment staging and storage, and distribution of excavated soils. The project is being undertaken to comply with the CPUC GO 95 Clearance Code Requirements, which set forth regulations for the amount of space that must be maintained between transmission lines and the ground.

**9. Surrounding land uses and setting:**

Surrounding land uses include open space, minimal rural residential structures, mountainous terrain, and LADWP's Van Norman Complex.

**10. Other public agencies whose approval is required:**

**Reviewing Agencies**

- State Water Resources Control Board (Section 402 Storm Water Permit Associated with Construction Activities)
- Regional Water Quality Control Board (Section 401 Water Quality Certification and Waste Discharge Requirements)
- Los Angeles County (grading permit, if required)
- California Department of Fish and Wildlife (Section 1602 Notification of Lake or Streambed Alteration)
- U.S. Army Corps of Engineers (Section 404 Nationwide Permit)

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

Notification of the proposed project has been provided to a list of all tribes provided by the Native American Heritage Commission. LADWP has initiated consultation with tribes that responded to the consultation invitation request. See Section 3.18, Tribal Cultural Resources, for details.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see Public Resources Code Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

## Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklists on the following pages. With the implementation of mitigation measure outlined in the following pages, all impacts would be mitigated to less than significant

- |                                                          |                                                             |                                                                        |
|----------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                                   |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources      | <input type="checkbox"/> Energy                                        |
| <input checked="" type="checkbox"/> Geology and Soils    | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials               |
| <input type="checkbox"/> Hydrology and Water Quality     | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                             |
| <input type="checkbox"/> Noise                           | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                      | <input type="checkbox"/> Transportation                     | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems   | <input type="checkbox"/> Wildfire                           | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

## Determination

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

*Jane Hauptman*

\_\_\_\_\_  
Signature

June 20, 2025

\_\_\_\_\_  
Date

### 3.1 Aesthetics

| Would the project:                                                                                                                                                                                                                                                                                                                                                         | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista?                                                                                                                                                                                                                                                                                                                    | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?                                                                                                                                                                                                                   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?                                                                                                                                                                                                                                                      | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

#### Existing Setting

The proposed project is scattered along the Adelanto-Rinaldi transmission line, extending between the San Fernando Valley of the City of Los Angeles and the southern extent of the Antelope Valley. The proposed project occurs within the northern half of Los Angeles County, and generally straddles the Transverse Ranges through the Santa Clarita River Valley, Soledad Canyon, and the Sierra Pelona Mountains.

**a) *Would the project have a substantial adverse effect on a scenic vista?***

**Less-than-Significant Impact.** While there are no known and designated scenic vistas in the project area, the ADL-RIN L1 transmission line corridor traverses moderate to very steep mountainous terrain. Primary receptors afforded views of the project area include interstate, highway, and local roadway motorists and dispersed, trail-based recreationists. Trail-based recreationists within the Sierra Pelona Mountains are also afforded views of the project area landscape.

As proposed, the project involves grading and tower raising activities at 17 work areas. Existing access and spur roads, transmission towers and transmission line infrastructure are visible from segments of state highways (SR-14 and I-5), and local roadways. However, because the line and color contrast of access and spur roads are currently evident in the existing landscape, proposed grading activities within the existing LADWP ROW would not substantially affect existing views in the project area. When viewed from elevated vantage points such as hiking trails on rising terrain in the surrounding area or mountain peaks, grading activities could result in additional smooth-texture and linear bands of discoloration in the desert

landscape. However, due to the existing presence of access and spur roads along the ADL-RIN L1 corridor and given the broad, sweeping nature of views from elevated vantage points in the desert landscape, grading activities would not have a substantial adverse effect on scenic views. Furthermore, the tall, geometric form of steel lattice structures currently dots the project area landscape. As a result of tower raising activities, the towers would be approximately 10 feet taller when compared to existing conditions. As such and following construction, views containing the slightly taller steel lattice towers would not be substantially altered. Therefore, the project would not have a substantial adverse effect on a scenic vista and impacts would be less than significant.

**b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

**Less-than-Significant Impact.** There are no formally designated state scenic highways in the project area. Therefore, due to distance and the presence of intervening vertical features between the highway and the project area, the proposed project would not damage scenic resources within a state scenic highway.

In addition to officially designated state scenic highways, the California Department of Transportation (Caltrans) identifies eligible state scenic highways. Unlike officially designated scenic highways, eligible highways have not yet been submitted to Caltrans for scenic highway approval and Corridor Protection Programs, which among other required elements, regulate land use and the density of development adjacent to the highway, and have not been adopted by the local governing body. Although I-5 through San Fernando Valley is listed as an eligible scenic highway, tower raises 77-1 and 76-5 located in San Fernando Valley at the Van Norman Reservoir complex are not visible from I-5.

The proposed project may be briefly visible from segments of different local roadways; however, given that proposed grading would be located along the transmission line corridor where access and spur roads (and their resulting line, color, and texture contrast) are relatively commonplace, grading activities would not substantially damage existing views of the high desert and mountainous landscape. Tower raising activities may be visible to motorists along the Sierra Highway near the community of Agua Dulce and Sleepy Valley; however, even with the proposed insertion of vertical extensions to the tower body that would increase the overall height of the structure by approximately 10–20 feet, the towers would present a similar form and line in the landscape and would display a similar steel lattice character as nearby towers within the transmission line corridor. Furthermore, the taller towers would be located within a desert landscape that has been visibly modified by the existing transmission line corridor. Because tower raising activities would entail the insertion of vertical extensions onto existing towers and the towers would be viewed in line with existing energy, agriculture, and transportation development that has altered the characteristic desert landscape, tower raising activities would not substantially damage existing views of the landscape. Therefore, impacts to scenic resources within the viewshed of state scenic highways would be less than significant.

**c) *In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

**Less-than-Significant Impact.** During construction activities associated with the proposed project, project activities, material deliveries, equipment, trucks, and vehicles within the ADL-RIN L1 transmission line

corridor would not be very visible to traveling motorists due to the steep terrain and isolated locations of the towers and spans. Dispersed trail-based recreationists surrounding the transmission line corridor may be afforded views of construction activities. However, construction activities would occur for up to 2.5 years along an existing utility corridor marked by tall, steel lattice transmission line towers, multiple transmission lines, and linear discoloration and disturbance associated with access and spur roads. Once construction activities cease, the visual effects of grading activities would be scattered throughout the existing high-voltage transmission line corridor and would create similar line, color, and texture contrast as nearby existing access and spur roads. For example, existing access and spur roads display relatively straight and smooth textured lines in the landscape and proposed grading activities would display similar visual characteristics. In several instances, proposed grading activities would simply expand the width of existing access and spur roads and as a result would not be overly distinguishable from existing linear, ground level visual disturbance in the transmission line corridor. Therefore, the level of noticeable change to the corridor is anticipated to be low, and additional line and texture contrasts would not dominate the setting. Grading activities would not substantially alter the existing character of the transmission line corridor or the existing landscape.

The eight towers that are proposed for raising include towers 32-4, 43-2, 46-4, 54-2, 57-2, 61-2, 76-5, and 77-1. To achieve the required conductor-to-ground clearances, the existing free-standing lattice steel towers would be modified in a manner that increases clearance distances (10 feet increase in height for all towers, with exception of one tower to be raised 20 feet). Tower raises would produce negligible visual change in the landscape. The towers would continue to display a tall, geometric form, angular steel lattice lines, and a greyish color. Therefore, because the visual character of the elevated towers would be similar to that of existing towers, the level of perceptible change to the landscape would be extremely low.

Indirect impacts associated with the proposed project may include temporary visual impacts associated with the generation of fugitive dust and the presence of heavy equipment. Construction activities would occur sequentially along an existing utility corridor and as such, visible dust emissions would not be produced in any one location for an extended period of time. Similarly, construction vehicles, equipment, and workers would not remain in any one location for an extended period of time. In addition, construction activities would comply with all applicable air quality regulations and may require the regular application of water or other materials to suppress fugitive dust emissions.

Overall, the proposed project would occur along an existing high-voltage transmission line corridor and the raised towers would display a scale, form, line, color, and texture similar to that of existing towers, therefore, impacts would be less than significant.

**d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

**Less-than-Significant Impact.** Both grading and tower raising activities are anticipated to occur during daytime hours and as such, the use of temporary outdoor lighting during evening and nighttime hours to illuminate construction work areas would not be required. New lighting would not be installed along access roads or grading areas and as such, grading activities would not create a new source of substantial light during project operations. Similar to the existing steel lattice towers, the slightly taller steel lattice towers would not require the installation of FAA obstruction lighting. Following the insertion of vertical extensions within the tower bodies, the towers would be approximately 10 feet (20 feet at one location) taller than under existing conditions. The slightly taller structures would be approximately 120-130 feet above ground

level (AGL) and would not be anticipated to exceed the 200 feet AGL height standard established by the FAA (FAA 2007) to determine whether marking and/or lighting is required on temporary or permanent structures. Therefore, operation of slightly taller transmission line towers would not create a new source of substantial light that would adversely affect nighttime views in the area.

The temporary influx of construction vehicles and equipment to the rugged mountainous landscape would not create substantial daytime glare that would affect day views. During grading operations, the estimated work force would be between 4 to 6 workers per day and would increase to 12 to 24 workers per site during tower raising activities. The relatively small construction work force necessitated by the project would not require a large fleet of construction vehicles and equipment. Furthermore, project activities would be carried out within the existing LADWP ROW transmission line corridor in which maintenance vehicles can occasionally be seen by passing motorists. Lastly, with the exception of glass, construction vehicles and equipment contain limited amount of potentially reflective materials capable of generating daytime glare. With regard to the tower raising activities, vertical extensions would be inserted within tower bodies and these components would be constructed of a similar material (steel) as the existing tower. Therefore, the new structures would not constitute a new source of potential glare that would adversely affect existing day views. Impacts would be less than significant.

### 3.2 Agriculture and Forestry Resources

| Would the project:                                                                                                                                                                                                                                                                         | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?                                             | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?                                                                                                                                                                                                       | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use?                                                                                                                                                                                                       | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?                                                                               | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

- a) ***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

No Impact. According to the state of California Farmland Mapping and Monitoring Program (FMMP) all of the 17 project site locations are located on land designated as “other land,” and no sites are located on designated farmland (FMMP 2025). As such, no farmland would be converted to non-agricultural uses, and there would be no impact.

- b) ***Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

No Impact. The proposed project would not be located on land designated as part of a Williamson Act contract. Additionally, none of the proposed work areas would be located on agriculturally zoned land. For these reasons, there would be no impact related to conflicts with agricultural zoning and Williamson Act contracts.

- c) ***Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?***

No Impact. The proposed project occurs within the northern half of Los Angeles County, and generally straddles the Transverse Ranges through the Santa Clarita River Valley, Soledad Canyon, and Sierra Pelona Mountains. Forest land, timberland, or Timberland Production zones do not exist in the project area. No impact would occur.

- d) ***Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

No Impact. As described under item (c) above, the project area does not include forest land. As such, no forest land would be lost or converted on a non-forest use by the proposed project and there would be no impact.

- e) ***Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

No Impact. The proposed project would occur where LADWP’s towers and transmission lines currently exist, none of which are located on designated farmland or forest land. Therefore, no impacts would occur as a result of conversion of Farmland or forest land to non-agricultural or non-forest use.

### 3.3 Air Quality

| Would the project:                                                                                                                                                                                | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan?                                                                                                                   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                            | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?                                                                                 | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

#### Existing Setting

The Project is located mostly within the Mojave Desert Air Basin (MDAB) with small portions of the Project located within South Coast Air Basin (SCAB). Areas within the MDAB are subject to the rules and regulations imposed by the Antelope Valley Air Quality Management District (AVAQMD) and areas within the SCAB are subject to the rules and regulations imposed by South Coast Air Quality Management District (SCAQMD). The AVAQMD, which was established by the state legislature, separated the Antelope Valley and northern Los Angeles County from the SCAQMD. The AVAQMD and the SCAQMD are the regional agencies responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the Antelope Valley region of the MDAB and the SCAB, respectively. The work sites of the proposed project are all located along the existing ADL-RIN L1 transmission lines in the northern portion of Los Angeles County. The California Clean Air Act, like its federal counterpart, called for the designation of areas as “attainment” or “nonattainment,” but based on California Ambient Air Quality Standards (CAAQS) rather than the National Ambient Air Quality Standards (NAAQS). Table 3.3-1 depicts the current attainment status of the Los Angeles County portion of the MDAB and the SCAB with respect to the NAAQS and CAAQS.

**Table 3.3-1. Mojave Desert and South Coast Air Basin Attainment Classifications**

| Pollutant                       | Designation/Classification <sup>a</sup> |                      |                              |                      |
|---------------------------------|-----------------------------------------|----------------------|------------------------------|----------------------|
|                                 | Mojave Desert Air Basin                 |                      | South Coast Air Basin        |                      |
|                                 | National Standards                      | State Standards      | National Standards           | State Standards      |
| Ozone (O <sub>3</sub> ), 1-hour | No national standard                    | <b>Nonattainment</b> | No national standard         | <b>Nonattainment</b> |
| Ozone (O <sub>3</sub> ), 8-hour | <b>Severe nonattainment<sup>b</sup></b> | <b>Nonattainment</b> | <b>Extreme nonattainment</b> | <b>Nonattainment</b> |

**Table 3.3-1. Mojave Desert and South Coast Air Basin Attainment Classifications**

| Pollutant                                     | Designation/Classification <sup>a</sup> |                      |                              |                      |
|-----------------------------------------------|-----------------------------------------|----------------------|------------------------------|----------------------|
|                                               | Mojave Desert Air Basin                 |                      | South Coast Air Basin        |                      |
|                                               | National Standards                      | State Standards      | National Standards           | State Standards      |
| Nitrogen Dioxide (NO <sub>2</sub> )           | Unclassifiable/attainment               | Attainment           | Attainment/maintenance       | Attainment           |
| Carbon Monoxide (CO)                          | Unclassifiable/attainment               | Attainment           | Attainment/maintenance       | Attainment           |
| Sulfur Dioxide (SO <sub>2</sub> )             | Unclassifiable/attainment               | Attainment           | Unclassifiable/attainment    | Attainment           |
| Coarse Particulate Matter (PM <sub>10</sub> ) | Unclassifiable/attainment               | <b>Nonattainment</b> | Attainment/maintenance       | <b>Nonattainment</b> |
| Fine Particulate Matter (PM <sub>2.5</sub> )  | Unclassifiable/attainment               | Attainment           | <b>Serious nonattainment</b> | <b>Nonattainment</b> |
| Lead                                          | Unclassifiable/attainment               | Attainment           | Unclassifiable/attainment    | Attainment           |
| Hydrogen Sulfide                              | No national standard                    | Unclassified         | No national standard         | Unclassified         |
| Sulfates                                      | No national standard                    | Attainment           | No national standard         | Attainment           |
| Visibility-Reducing Particles                 | No national standard                    | Unclassified         | No national standard         | Unclassified         |
| Vinyl Chloride                                | No national standard                    | No designation       | No national standard         | Unclassified         |

**Sources:** EPA 2023 (national); CARB 2023 (State).

**Notes:** Bold text = not in attainment; attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards; unclassified or unclassifiable = insufficient data to classify; unclassifiable/attainment = meets the standard or is expected to be meet the standard despite a lack of monitoring data.

<sup>a</sup> Designations/classifications in bold type indicate nonattainment.

<sup>b</sup> West Mojave Desert portion of the MDAB, where the Project is located, is designated severe nonattainment. The Kern County portion of the MDAB is designated moderate nonattainment, and the remaining areas of the MDAB are designated unclassifiable/attainment.

In summary, the MDAB is designated as a nonattainment area for national and State O<sub>3</sub> standards and State PM<sub>10</sub> standards, and unclassifiable/attainment for all other criteria air pollutants. The SCAB is designated as a nonattainment area for national and State O<sub>3</sub> standards and national and State PM<sub>2.5</sub> standards. The SCAB is designated as a nonattainment area for State PM<sub>10</sub> standards; however, it is designated as an attainment area for federal PM<sub>10</sub> standards. The Los Angeles County portion of the SCAB is designated as an attainment area for national and State CO standards, national and State NO<sub>2</sub> standards, national and State lead standards, and national and State SO<sub>2</sub> standards.

**a) Would the project conflict with or obstruct implementation of the applicable air quality plan?**

Less-than-Significant Impact. The AVAQMD has a variety of air quality management and attainment plans that include control measures and strategies to be implemented to attain the CAAQS and NAAQS in the Antelope Valley. The AVAQMD then implements these control measures as regulations to control or reduce

criteria pollutant emissions from stationary sources or equipment. AVAQMD air quality management and attainment plans include the following:

- 2004 State and Federal Ozone Attainment Plan
- 2006 8-hour Ozone Reasonably Available Control Technology – State Implementation Plan (RACT SIP) Analysis
- 2008 Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Nonattainment Area)
- 2014 Supplement to the 8-hour Ozone RACT SIP Analysis
- 2015 8-hour RACT SIP Analysis
- 2016 Federal 75 Parts per Billion Ozone Attainment Plan

### Antelope Valley Air Quality Management and Attainment Plans

The purpose of a consistency finding with regard to the air quality management and attainment plans is to determine if a project is consistent with the assumptions and objectives of the air quality management and attainment plans and if it would interfere with the region's ability to comply with federal and state air quality standards. The AVAQMD has established criteria for determining consistency with the currently applicable air quality management and attainment plans in their CEQA and Federal Conformity Guidelines (AVAQMD 2016). Per the Guidelines, a project is deemed to conform with applicable attainment or maintenance plans, and hence not be significant, if it is consistent with the existing land use plan. Zoning changes, specific plans, general plan amendments, and similar land use plan changes that do not increase dwelling unit density, do not increase vehicle trips, and do not increase vehicle miles traveled are also deemed to not exceed this threshold (AVAQMD 2016).

The AVAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by the Southern California Association of Governments (SCAG) for its 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016).<sup>1</sup> AVAQMD uses this document, which is based on general plans for cities and counties in the MDAB, to develop the emissions inventory in its air quality management and attainment plans. The SCAG RTP/SCS and associated Regional Growth Forecast are generally consistent with the local plans; therefore, the AVAQMD's air quality management and attainment plans are generally consistent with local government plans.

The proposed project would not require a General Plan amendment or zoning designation change within the project area. Additionally, as the project does not include new commercial space or residences, no increase to population or housing are anticipated as part of the project. As such, since the proposed project is not anticipated to result in growth that would conflict with projections (see Section 3.14, Population and Housing, for further details), it would not conflict with or exceed the assumptions in the AVAQMD's Air Quality Management and Attainment Plans. Accordingly, the Project is consistent with the SCAG RTP/SCS forecasts used in development of the AVAQMD's Air Quality Management and Attainment Plans.

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<sup>1</sup> The SCAG has a more recently adopted RTP/SCS, the 2024–2045 RTP/SCS Connect SoCal Plan. However, the AVAQMD's Air Quality Management and Attainment Plans rely on land use and demographic data from the 2016–2040 RTP/SCS. Therefore, for the purpose of assessing consistency with these plans, land use information and demographic data from the 2016 RTP/SCS was utilized in this analysis.

## South Coast Air Quality Management Plan

The SCAQMD has established criteria for determining consistency with the currently applicable Air Quality Management Plan (AQMP) in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

Consistency Criterion No. 1: Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.

Consistency Criterion No. 2: Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, Project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed in Section 3.3(b), below. Detailed results of this analysis are included in Appendix B. As presented below in Section 3.3(b), the proposed project would not generate criteria air pollutant emissions that exceed the SCAQMD's thresholds, and the project would therefore not conflict with Criterion No. 1.

The second criterion regarding the potential of the proposed project to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between a proposed project's land use designations and its potential to generate population growth. As discussed previously, the proposed project would not require a general plan amendment or zoning designation change within the project area. Additionally, as the proposed project does not include new commercial space or residences, no increase to population or housing are anticipated as part of the proposed project. The project would result in a small temporary increase in employment in the project area during construction. However, this net increase in employees represents a negligible increase in employment compared to the SCAG forecast for the unincorporated portion of Los Angeles County, which forecasts an increase in employment of 50,900 jobs between 2020 and 2040. Accordingly, the project is consistent with the SCAG RTP/SCS forecasts used in development of the SCAQMD's AQMP.

In summary, based on the considerations presented above, impacts relating to the project's potential to conflict with, or obstruct implementation of the applicable air quality plans in both the AVAQMD and SCAQMD would be less than significant.

**b) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

**Less-than-Significant Impact.** Construction of the proposed project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) has adopted ambient air quality standards (i.e., CAAQS). Projects that emit these pollutants have the potential to cause or contribute to violations of these standards. The AVAQMD and the SCAQMD have adopted significance thresholds, which, if exceeded, would indicate the potential to contribute to violations of the CAAQS.

The AVAQMD CEQA Air Quality Significance Thresholds set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would indicate the potential for a project to

contribute to violations of the NAAQS or CAAQS. Table 3.3-2 lists the AVAQMD Air Quality Significance Thresholds (AVAQMD 2016).

**Table 3.3-2. Antelope Valley Air Quality Management District Thresholds of Significance**

| Criteria Pollutant                      | Daily Threshold (pounds per day) <sup>a</sup> | Annual Threshold (tons per year) |
|-----------------------------------------|-----------------------------------------------|----------------------------------|
| Volatile Organic Compounds (VOC)        | 137                                           | 25                               |
| Oxides of Nitrogen (NO <sub>x</sub> )   | 137                                           | 25                               |
| Carbon Monoxide (CO)                    | 548                                           | 100                              |
| Oxides of Sulfur (SO <sub>x</sub> )     | 137                                           | 25                               |
| Particulate Matter (PM <sub>10</sub> )  | 82                                            | 15                               |
| Particulate Matter (PM <sub>2.5</sub> ) | 65                                            | 12                               |

Source: AVAQMD 2016.

Notes: VOC = volatile organic compounds; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; TAC = toxic air contaminant.

<sup>a</sup> The AVAQMD daily thresholds are generally applicable to multi-phased projects with phases shorter than 1 year and therefore, are primarily used for emissions from construction-related activities. The annual thresholds are generally for projects with emissions that would occur for longer than 1 year and thus, are generally applied to project-generated operational activities.

The SCAQMD CEQA Air Quality Significance Thresholds, as revised in April 2019, set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would indicate the potential for a project to contribute to violations of the NAAQS or CAAQS. Table 3.3-3 lists the revised SCAQMD Air Quality Significance Thresholds (SCAQMD 2023).

**Table 3.3-3. South Coast Air Quality Management District Air Quality Significance Thresholds**

| Criteria Pollutants Mass Daily Thresholds |                                                                                                                                                                                  |                            |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Pollutant                                 | Construction (pounds per day)                                                                                                                                                    | Operation (pounds per day) |
| VOCs                                      | 75                                                                                                                                                                               | 55                         |
| NO <sub>x</sub>                           | 100                                                                                                                                                                              | 55                         |
| CO                                        | 550                                                                                                                                                                              | 550                        |
| SO <sub>x</sub>                           | 150                                                                                                                                                                              | 150                        |
| PM <sub>10</sub>                          | 150                                                                                                                                                                              | 150                        |
| PM <sub>2.5</sub>                         | 55                                                                                                                                                                               | 55                         |
| Lead <sup>a</sup>                         | 3                                                                                                                                                                                | 3                          |
| TACs and Odor Thresholds                  |                                                                                                                                                                                  |                            |
| TACs <sup>b</sup>                         | Maximum incremental cancer risk ≥10 in 1 million<br>Cancer Burden >0.5 excess cancer cases (in areas ≥1 in 1 million)<br>Chronic and acute hazard index ≥1.0 (project increment) |                            |
| Odor                                      | Project creates an odor nuisance pursuant to SCAQMD Rule 402                                                                                                                     |                            |

Source: SCAQMD 2023.

Notes: VOC = volatile organic compounds; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; TAC = toxic air contaminant; SCAQMD = South Coast Air Quality Management District.

<sup>a</sup> The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

<sup>b</sup> TACs include carcinogens and noncarcinogens.

The proposed project would result in a cumulatively considerable net increase for O<sub>3</sub>, which is a nonattainment pollutant, if the project's construction or operational emissions would exceed the AVAQMD or SCAQMD's VOC or NO<sub>x</sub> thresholds shown in Table 3.3-1 and Table 3.3-2. These emission-based thresholds for O<sub>3</sub> precursors are intended to serve as a surrogate for an O<sub>3</sub> significance threshold (i.e., the potential for adverse O<sub>3</sub> impacts to occur) because O<sub>3</sub> itself is not emitted directly, and the effects of an individual project's emissions of O<sub>3</sub> precursors (i.e., VOCs and NO<sub>x</sub>) on O<sub>3</sub> levels in ambient air cannot be determined through air quality models or other quantitative methods.

## Construction Emissions

Construction of the proposed project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, dust emissions, and combustion pollutants from on-site construction equipment, as well as from employee vehicles and off-site trucks hauling construction materials. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

Pollutant emissions associated with temporary construction activities were quantified using the California Emissions Estimator Model (CalEEMod), Version 2022 available online). Construction activities, major construction equipment, and quantities of excavated soils are project specific. Default values provided by CalEEMod were used where detailed project information was not available.

It is anticipated that construction of the proposed project would commence in 2025 and would last up to 2.5 years,<sup>2</sup> depending on weather conditions, site access, and the availability of Power System Construction and Maintenance (PCM) and Transmission Construction and Maintenance (TCM) personnel and equipment. The estimated annual construction emissions were based on the following assumptions (duration of phases is approximate):

- **PCM Temp Access Road:** 3 months
- **PCM Access Road:** 4 months
- **PCM Grading:** 6 months
- **TCM Grading:** 6 months
- **Ampjack – Tower Rasing:** 16 months

The construction equipment mix included in the model for the proposed project are shown in Table 3.3-4, Anticipated Construction Equipment. The equipment mix anticipated for construction activities is based on LADWP input and typical construction practices. The equipment mix is meant to represent a reasonably conservative estimate of construction activities. For most of the equipment, it was assumed that a "typical" equipment fleet (such as horsepower and load factor, as implemented by CalEEMod) would be used for construction. For the analysis, it is generally assumed that heavy construction equipment would operate for approximately 8 hours per day, 5 days per week. As discussed in Section 2.2, Construction, helicopter use may be required to access two tower sites, Tower 43-2 and Tower 46-4, where the terrain is steep or

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<sup>2</sup> The analysis assumes a construction start date of January 2025, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

access is limited. Emission factors for helicopters were obtained from Federal Office of Civil Aviation’s Guidance on Determination of Helicopter Emissions (FOCA 2017) assuming an Agusta A139 helicopter would be representative for the proposed project per input from LADWP.

**Table 3.3-4. Anticipated Construction Equipment**

| Construction Phase      | Equipment                 | Quantity |
|-------------------------|---------------------------|----------|
| PCM Grading             | Rubber Tired Dozers       | 1        |
|                         | Tractors/Loaders/Backhoes | 1        |
|                         | Excavators                | 1        |
| TCM Grading             | Graders                   | 1        |
|                         | Rubber Tired Dozers       | 1        |
|                         | Tractors/Loaders/Backhoes | 1        |
|                         | Rubber Tired Loaders      | 1        |
| PCM Temp Access Road    | Tractors/Loaders/Backhoes | 1        |
|                         | Rubber Tired Dozers       | 1        |
|                         | Excavators                | 1        |
| PCM Access Road         | Rubber Tired Dozers       | 1        |
|                         | Tractors/Loaders/Backhoes | 1        |
|                         | Grader                    | 1        |
|                         | Rollers                   | 1        |
|                         | Excavators                | 1        |
| Ampjack – Tower Raising | Cranes                    | 1        |
|                         | Forklifts                 | 2        |
|                         | Tractor/Loader/Backhoe    | 2        |
|                         | Helicopter <sup>1</sup>   | 1        |

**Note:** See Appendix B for more information.

<sup>1</sup> The helicopter would be used for only two tower locations where access is limited.

Table 3.3-5, Estimated Construction Emissions, depicts the peak daily emissions of the following two worst-case construction scenarios: (1) simultaneous tower raising and grading activities; and (2) concurrent grading activities at two sites. Annual emissions are also included in Table 3.3-5 to account for all grading and tower raising activities of the proposed project.

**Table 3.3-5. Estimated Construction Emissions**

|                                                               | VOC          | NO <sub>x</sub> | CO           | SO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
|---------------------------------------------------------------|--------------|-----------------|--------------|-----------------|------------------|-------------------|
| Maximum Daily Emissions (pounds per day)                      | 2.93         | 23.68           | 28.61        | 0.05            | 4.51             | 2.43              |
| Helicopter Emissions (pounds per day)                         | 24.62        | 63.99           | 31.31        | NA              | 1.99             | 1.99              |
| <b>Total (Maximum daily emissions + helicopter emissions)</b> | <b>27.55</b> | <b>87.67</b>    | <b>59.92</b> | <b>0.05</b>     | <b>6.50</b>      | <b>4.42</b>       |
| <i>AVAQMD Daily Threshold</i>                                 | 137          | 137             | 548          | 137             | 82               | 65                |
| <i>SCAQMD Daily Threshold</i>                                 | 75           | 100             | 550          | 150             | 150              | 55                |
| <b>Thresholds Exceeded?</b>                                   | <b>No</b>    | <b>No</b>       | <b>No</b>    | <b>No</b>       | <b>No</b>        | <b>No</b>         |
| Annual Emissions (tons per year)                              | 0.49         | 1.74            | 2.63         | <0.01           | 0.34             | 0.19              |
| Helicopter Emissions (tons per year)                          | 0.12         | 1.95            | 0.27         | <0.01           | 0.04             | 0.04              |
| <b>Total (Annual emissions + helicopter emissions)</b>        | <b>0.74</b>  | <b>5.05</b>     | <b>3.70</b>  | <b>&lt;0.01</b> | <b>0.39</b>      | <b>0.24</b>       |

**Table 3.3-5. Estimated Construction Emissions**

|                                | VOC       | NO <sub>x</sub> | CO        | SO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
|--------------------------------|-----------|-----------------|-----------|-----------------|------------------|-------------------|
| <i>AVAQMD Annual Threshold</i> | 25        | 25              | 100       | 15              | 15               | 12                |
| <b>Thresholds Exceeded?</b>    | <b>No</b> | <b>No</b>       | <b>No</b> | <b>No</b>       | <b>No</b>        | <b>No</b>         |

**Notes:** NA = Not Applicable. VOC = ROG (in CalEEMod Output)

See Appendix B for detailed results. These estimates reflect control of fugitive dust required by AVAQMD Rule 403.2.

As shown in Table 3.3-5, annual and daily construction emissions would not exceed the AVAQMD and SCAQMD significance thresholds for VOC, NO<sub>x</sub>, carbon monoxide (CO), oxides of sulfur (SO<sub>x</sub>), PM<sub>10</sub>, or PM<sub>2.5</sub>. Additionally, the proposed project would be required to comply with SCAQMD Rule 403 and AVAQMD Rule 403 to control fugitive dust emissions generated during grading activities. Standard construction practices that would be employed to reduce fugitive dust emissions include the following:

- Short-term dust control by a water truck and/or available water source
- Minimize and rapid cleanup of project-related trackout or spills onto paved roads;
- Cover haul trucks;
- Stabilize (chemical or vegetation) site upon completion of grading when subsequent development is delayed; and
- Minimize grading and soil movement when winds exceed 30 miles per hour.

In regards to long-term operations, the proposed project would not change the routine inspection and maintenance of the existing transmission lines or result in a net increase in emissions. Overall, the proposed project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

As previously discussed, the MDAB is a nonattainment area for O<sub>3</sub> and PM<sub>10</sub>, and the SCAB is a nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> under the CAAQS. The poor air quality in the MDAB is the result of cumulative emissions from motor vehicles, off-road equipment, commercial and industrial facilities, and other emission sources. Projects that emit these pollutants or their precursors (i.e., VOC and NO<sub>x</sub> for O<sub>3</sub>) potentially contribute to poor air quality. As indicated in Table 3.3-5, daily and annual construction emissions associated with the proposed project would not exceed the AVAQMD or SCAQMD significance thresholds. The proposed project would not generate a long-term increase in operational emissions. Furthermore, the proposed project would not conflict with the AVAQMD OR SCAQMD Attainment Plans, which address the cumulative emissions in the MDAB and SCAB and account for emissions associated with construction activities. Accordingly, the proposed project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants. This impact would be less than significant.

**c) *Would the project expose sensitive receptors to substantial pollutant concentrations?***

*Less-than-Significant Impact.* The AVAQMD and SCAQMD consider residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes to be sensitive receptor land uses (SCAQMD 1993). Land uses surrounding the proposed work areas consists primarily of undeveloped open space areas in the Mojave Desert. There is some development within the vicinity, generally consisting of scattered rural residences. Construction of the proposed project would result in the temporary generation of emissions associated with on-site

equipment operation and off-site trucks and worker vehicles; however, emissions would be below the AVAQMD and SCAQMD thresholds and would not result in substantial criteria air pollutant emissions. In addition, the construction activities would move along the transmission line corridor and would not result in extended exposure of individual residences to criteria air pollutants or toxic air contaminants (such as diesel particulate matter). Therefore, although rural residential land uses are located in the vicinity of the project area, the proposed project would not expose residents to long-term substantial air pollutant or toxic air contaminant concentrations. Accordingly, the proposed project would result in a less-than-significant impact.

**d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

*Less-than-Significant Impact.* Odors are a form of air pollution that is most obvious to the general public and can present problems for both the source and surrounding community. Although offensive odors seldom cause physical harm, they can be considered an annoyance and cause concern. Odors would potentially be generated from vehicles and equipment exhaust emissions during construction of the proposed project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. Such odors are temporary and generally occur at magnitudes that would not affect substantial numbers of people. In regards to long-term operations, the proposed project would not change the routine inspection and maintenance of the existing transmission lines and would not result in any sources of substantial odors. Therefore, impacts associated with odors would be considered less than significant.

### 3.4 Biological Resources

| Would the project:                                                                                                                                                                                                                                                                                                   | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?                                                               | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?                                                                                         | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| Would the project:                                                                                                                                                                                                                 | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?                                                                                                | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/>            |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?                                               | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

### Special-Status Species

Less-than-Significant Impact with Mitigation Incorporated. There are 57 special-status plant species and 54 special-status wildlife species with recorded occurrences in the U.S. Geologic Survey 7.5-minute topographic quadrangles in which the project is located (i.e., Littlerock, Palmdale, Ritter Ridge, Sleepy Valley, Agua Dulce, San Fernando, and Mint Canyon), and surrounding 20 quadrangles (CDFW 2023; CNPS 2023; USFWS 2023). Of these, two special-status plant species and three special-status wildlife species were detected within the project’s Biological Survey Area (BSA) (project footprint plus a 100-foot buffer), and nine special-status wildlife species have a moderate potential to occur within the BSA due to presence of suitable habitat and site conditions. The project would have significant impacts on special-status species absent mitigation or avoidance. Impacts to these species and proposed mitigation measures are discussed below. Plant species that are not considered special-status but are protected under the locally enforced California Desert Native Plants Act (i.e., chaparral yucca [*Hesperoyucca whipplei*], Wiggins’ cholla [*Cylindropuntia echinocarpa*], blue elderberry [*Sambucus mexicana*], oak trees [*Quercus* spp.]) are discussed below under Section 3.4(e) (impacts associated with local policies and ordinances).

### Special-Status Plants

#### Slender Mariposa Lily

In total, 274 slender mariposa lily (*Calochortus clavatus* var. *gracilis*) individuals occupying approximately 0.25 acres (10,796 square feet) were mapped within the BSA at two work locations during the focused special-status plant surveys conducted in May 2023 (Appendix C Figure 4D and Figure 4G). Approximately

273 slender mariposa lilies were detected within and adjacent to the proposed grading footprint at Tower Span 65-4 to 66-1 and a single slender mariposa lily was detected approximately 42 feet north of the proposed grading footprint at Tower Span 57-1 to 57-2. Of those, 9 individuals occupying approximately 168 square feet (0.004 acres) were mapped within the project grading footprint for Tower Span 65-4 to 66-1. Therefore, the proposed project would permanently impact approximately 1.6% of the mapped occupied habitat for this species. Although this species is moderately threatened in California (California Rare Plant Rank 1B.2), this impact would be adverse, but not significant. The loss of slender mariposa lily individuals is not considered a significant impact due to the very small amount of impacts to occupied habitat resulting from the proposed project and the species' scattered distribution throughout Ventura and Los Angeles Counties. Therefore, this impact would not reduce regional populations of the species to below self-sustaining numbers and direct permanent impacts to slender mariposa lily would be less than significant absent mitigation.

The project originally proposed to grub a 75-foot radius from the center of the Tower Span 65-4 to 66-1 work area and the Tower Span 57-1 to 57-2 work area, which would result in increasing direct impacts to almost all of the overall mapped occupied habitat for this species. This impact would be significant if not mitigated or avoided. LADWP has indicated that clearing and grubbing in areas occupied by slender mariposa lily outside of the grading footprint can be avoided during project activities. LADWP implementation of Mitigation Measure (MM) BIO-1 (Biological Monitoring), which requires environmental training and biological monitoring, and MM-BIO-2 (Demarcation of Disturbance Limits), which requires installation of temporary construction fencing and/or staking to identify the limits of grading/disturbance, would ensure avoidance of slender mariposa lily occupied habitat at the Tower Span 65-4 to 66-1 work area and the Tower Span 57-1 to 57-2 work area by prohibiting vegetation clearance activities within slender mariposa lily occupied habitat outside of the proposed grading footprint. Accordingly, direct temporary impacts to slender mariposa lily would be less than significant with implementation of **MM-BIO-1** and **MM-BIO-2**.

**MM-BIO-1**     **Biological Monitoring.** To prevent impacts to areas outside the limits of disturbance, a qualified biologist shall be present on site to monitor during initial ground disturbance or vegetation removal activities.

Biological monitoring shall include the following tasks and responsibilities:

- Communicate with LADWP and contractors prior to initial ground disturbance and vegetation removal at each work location to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds and/or Crotch's bumblebee [*Bombus crotchii*]). Discuss installation of temporary fencing and/or staking to demarcate grading limits; avoidance of vegetation clearing or grubbing in slender mariposa lily occupied habitat outside of proposed grading areas at Tower Span 65-4 to 66-1 and Tower Span 57-1 to 57-2; avoidance of western Joshua trees (*Yucca brevifolia*) at Tower 32-4; and avoidance of any ground disturbing activities (e.g., vegetation clearing, grubbing, and driving outside of established access areas) in western Joshua tree occupied habitat (186-foot buffer from individuals) or Joshua tree woodland at Tower 32-4.
- Conduct a pre-construction briefing at the tailgate with construction personnel prior to vegetation removal or initial ground disturbance to outline the biological resources

present at the subject work location, prohibition of littering, locations of covered trash receptacles, work location specific disturbance limits, procedures/training for minimizing harm to or harassment of wildlife encountered during construction.

- Conduct pre-construction sweeps where construction work is scheduled for the day in areas with suitable habitat to support special-status wildlife or plants (i.e., disturbed habitat, non-native grasslands, herbaceous fields, coastal or desert scrub, chaparral, California juniper [*Juniperus californica*] or Joshua tree woodland). Flush wildlife species from occupied areas immediately prior to vegetation-clearing and earth-moving activities during pre-construction sweeps.
- Verify that the construction contractor QSP is implementing the SWPPP BMPs and maintaining physical BMPs, as well as the stormwater management practices specifically for protection of biological resources. Perform regular inspections of fencing and erosion control measures (daily during rain events, if safe).
- Supervise and conduct regular spot checks during construction work, focusing on areas determined to have potential to support special-status species (as determined by a qualified biologist), to ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved.
- No-Grubbing Zones for Slender Mariposa Lily: Ensure avoidance of slender mariposa lily occupied habitat to be preserved in place, located where slender mariposa lily is mapped outside of proposed grading area. The project originally proposed for vegetation clearance in areas 75 feet from all tower span grading areas. Vegetation clearance must be avoided within the no-grubbing zones located at Tower Span 65-4 to 66-1 and Tower Span 57-1 to 57-2.
- Joshua Tree and Desert Native Plant Individual Flagging: Ensure avoidance of western Joshua trees and other desert native plants to be preserved in place. Western Joshua trees are present within the BSA at Tower 32-4. Take of western Joshua tree will be avoided as no Incidental Take Permit has been issued for the project under the Western Joshua Tree Conservation Act. Prior to the commencement of construction, a qualified biologist (someone with at least 3 years of conducting botanical surveys in the Mojave Desert) shall flag (using highly visible fluorescent flagging tape) western Joshua tree, chaparral yucca, Wiggin's cholla, and any other species covered by the California Desert Native Plant Act within the project footprint and a 100-foot buffer for avoidance.
- Relocation of wildlife. If slow-moving and/or fossorial special-status species that do not easily flush (e.g., California legless lizard [*Anniella* sp.], Northern California legless lizard [*Anniella pulchra*], California glossy snake [*Arizona elegans occidentalis*], coastal whiptail [*Aspidoscelis tigris stejnegeri*], Blainville's horned lizard [*Phrynosoma blainvillii*], San Diego desert woodrat [*Neotoma lepida intermedia*], and/or southern grasshopper mouse [*Onychomys torridus ramona*]) 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.

- Dust control monitoring. 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 roll compaction.
- 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 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. LADWP 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.

MM-BIO-2 **Demarcation of Disturbance Limits.** 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. All construction activities, including equipment staging and maintenance, shall be conducted within the marked disturbance limits to prevent inadvertent disturbance to sensitive biological resources outside the limits of work. The marked disturbance limits shall be maintained throughout vegetation removal and grading and any windblown trash generated by the project that collects on the fence will be regularly removed. Silt fencing shall be installed at disturbance limits where known sensitive biological resources (e.g., aquatic resources, occupied slender mariposa lily habitat) occur downslope. No-grubbing zones located at Tower Span 65-4 to 66-1 and Tower Span 57-1 to 57-2 must be clearly marked for avoidance. Additionally, western Joshua trees, chaparral yucca, Wiggin's cholla, and any other species covered by the California Desert Native Plant Act within the project footprint and a 100-foot buffer must be flagged (using highly visible fluorescent flagging tape) for avoidance prior to the start of construction. Any additional special-status biological resources discovered during pre-construction surveys or during construction monitoring, such as active nests, additional rare plants, occupied American badger (*Taxidea taxus*) dens, or Crotch's bumblebee nests shall be demarcated with pin flags, flagging tape, or flagging and stakes for avoidance. Presence of these avoidance areas shall be promptly communicated to the construction contractor.

### Western Joshua Tree

Twenty-seven western Joshua trees were mapped within the BSA at Tower 32-4, of which three occur within the project footprint where staging for tower raising activities is proposed to occur (Appendix C Figure 4Q). Direct impacts to any Joshua tree individuals would be considered significant absent mitigation, and as a

candidate species for listing under the California Endangered Species Act and a species protected under The Western Joshua Tree Conservation Act and the California Desert Native Plants Act, any trimming or removal of western Joshua trees would require a hazard management permit or Western Joshua Tree Conservation Act incidental take permit. However, LADWP has indicated that all Joshua trees can be avoided during project activities. As such, all western Joshua trees would be avoided and preserved in place, and all construction activities would occur within existing roads and access areas around the tower. Implementation of **MM-BIO-1**, which requires environmental training and biological monitoring, as well as **MM-BIO-2** requiring disturbance limit demarcations, would ensure avoidance of western Joshua trees at the Tower 32-4 work area by prohibiting any vegetation clearance activities at this work site and trimming or removal of Joshua trees. Accordingly, direct impacts to western Joshua trees would be less than significant with implementation of **MM-BIO-1** and **MM-BIO-2**.

### Indirect Impacts

Typically, CDFW considers any western Joshua tree within 186 feet of a direct impact to be indirectly impacted (Vander Wall et al. 2006). However, for this project, no western Joshua tree seedbank or associated species would be affected by the impact as no ground-moving activities are proposed within the BSA for Tower 32-4 and all work would remain on existing access roads and staging areas.

Indirect impacts to special-status plants may include inadvertent spillover impacts outside of the construction footprint, dust accumulation on special-status plants, chemical spills from construction equipment, stormwater erosion and sedimentation, and increased wildfire risk. Indirect impacts to special-status plants are considered significant absent mitigation. Implementation of **MM-BIO-1** will reduce potential impacts to a less-than-significant level through environmental training, biological monitoring, verification of the SWPPP, and general monitoring of the BMPs. Additionally, **MM-BIO-2** requires installation of temporary construction fencing and/or staking to identify the limits of grading/disturbance, which would reduce potential human trampling outside of the construction limits. Furthermore, implementation of BMPs would include sediment control, spraying to minimize fugitive dust, trash containment, and hazardous materials spill containment. Accordingly, potential indirect impacts to special-status plant species would be less than significant with implementation of BMPs, **MM-BIO-1** and **MM-BIO-2**.

See MM-BIO-1 and MM-BIO-2 above.

### Special-Status Wildlife

#### Crotch's bumblebee

Crotch's bumblebee is a candidate for listing under CESA as endangered. This bumblebee is a generalist forager and could forage anywhere within the BSA where suitable floral resources are present. Therefore, this species has a moderate potential to occur in scrub and herb-dominated vegetation communities containing the preferred plant genera within the BSA at Tower Span 38-1 to 38-2, Tower Span 38-4 to 39-1, Tower Span 41-3 to 41-4, Tower 46-4, Tower Span 49-2 to 49-3, Tower 54-2, Tower 57-2, Tower 61-2, Tower Span 65-4 to 66-1, Tower Span 70-4 to 71-1, Tower 76-5, and Tower 77-1. There is also potential for the project to support nesting sites for bumblebee colonies, including Crotch's bumblebee, which are primarily located underground in abandoned holes made by ground squirrels, mice, and rats, but may be above ground in abandoned bird nests or empty cavities (Osborne et al. 2008, Williams et al. 2014).

Implementation of the proposed project could result in direct impacts to Crotch's bumblebee through the removal of potentially suitable habitat. However, this impact would not be significant due to abundant suitable habitat present in the project vicinity. These areas will continue to provide habitat opportunities for this species. As a result, the loss of suitable habitat would not substantially reduce the habitat for the species and would not cause the species population to drop below self-sustaining levels; therefore, direct impacts resulting from the loss of habitat for Crotch's bumblebee would be less than significant.

Because Crotch's bumblebee typically nests underground, individuals would also be highly vulnerable to injury and mortality if present at a given work location in the BSA during construction. Harm to or the loss of individuals during construction could be significant, absent mitigation. Implementation of **MM-BIO-3** (Crotch's Bumblebee Pre-Construction Surveys) would require pre-construction habitat assessments and focused surveys to identify any Crotch's bumblebee nest(s) present within the impact footprint. The measure would require no-impact buffers to be established around nests if found, thereby avoiding potential direct impacts to Crotch's bumblebee resulting from the loss of individuals. In addition, **MM-BIO-1** would require environmental training and regular spot checks during construction work to ensure avoidance of direct impacts to this species. Furthermore, **MM-BIO-2** requires installation of pin flags, flagging tape, or staking to identify any special-status biological resources such as Crotch's bumblebee nests identified during pre-construction surveys or construction monitoring for avoidance. Accordingly, direct impacts to Crotch's bumblebee would be less than significant with implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3**.

See MM-BIO-1 and MM-BIO-2 above.

**MM-BIO-3** Crotch's Bumblebee Pre-Construction Surveys. A pre-construction survey for Crotch's bumblebee shall be conducted within the construction footprint where suitable habitat areas exist prior to the start of initial vegetation removal or initial grading activities occurring during the Crotch's bumblebee nesting period (February 1 through October 31). The survey shall ensure that no nests for Crotch's bumblebee are located within the construction area. A pre-construction habitat assessment shall be conducted for each work area. The habitat assessment shall, at a minimum, include historical and current species occurrences; document potential habitat on site including foraging, nesting, and/or overwintering resources; and identify which plant species are present. For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and man-made structures that may support bumblebee colonies such as rock walls, rubble, and furniture. If the habitat assessment leads to the determination that nesting resources are present in a given work area, focused surveys will be conducted.

The focused survey will be performed by a biologist with expertise in surveying for bumblebees and include at least three survey passes that are not on sequential days or in the same week, preferably spaced 2 to 4 weeks apart. The timing of these surveys shall coincide with the Colony Active Period (April 1 through August 31 for Crotch's bumblebee). Surveys may occur between 1 hour after sunrise and 2 hours before sunset. Surveys will not be conducted during wet conditions (e.g., foggy, raining, or drizzling) and surveyors will wait at least 1 hour following rain. Surveys may be conducted earlier if other bees or butterflies are flying. Surveys shall not be conducted when it is windy (i.e., sustained winds greater than 8 mph). Within non-developed habitats, the biologist shall look for nest

resources suitable for bumblebee use. Identification will include trained biologists netting/capturing the representative bumblebee in appropriate insect nets, per the protocol in U.S. National Protocol Framework for the Inventory and Monitoring of Bees.

If Crotch's bumblebee nests are not detected, no further action or mitigation would be required. If nest resources occupied by Crotch's bumblebee are detected within the construction area, no construction activities shall occur within 50 feet of the nest, or as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. The nest resources will be avoided for the duration of the Crotch's bumblebee nesting period (February 1 through October 31). Outside of the nesting season, it is assumed that no live individuals would be present within the nest as the daughter queens (gynes) usually leave by September, and all other individuals (original queen, workers, males) die. If the nest resources cannot be avoided during the nesting period, as outlined in this measure, LADWP will consult with CDFW regarding the need to obtain an Incidental Take Permit.

### Special-Status Reptiles

California legless lizard, Northern California legless lizard, California glossy snake, coastal whiptail, and Blainville's horned lizard have a moderate potential to occur in the BSA based on the presence of suitable habitat and known occurrences in the region.

Suitable habitat for these species is present throughout the BSA. Although vegetation and ground clearance activities associated with construction would remove potential suitable habitat for these species, direct impacts would be less than significant given the small impact footprint compared with the abundant habitat in the surrounding vicinity. These areas will continue to provide habitat opportunities for this species, and the loss of suitable habitat would not cause the species population to drop below self-sustaining levels. Furthermore, areas impacted by proposed grading activities would be restored post-construction. As a result, direct impacts to suitable habitat for special-status reptiles would be less than significant absent mitigation.

These species are cryptic and slow moving on the surface or are otherwise underground, and therefore, are highly vulnerable to mortality or injury if struck by moving vehicles or equipment if present on site during construction. Harm to or the loss of individuals during construction could be significant, absent mitigation. Implementation of **MM-BIO-1** would require environmental training, pre-construction sweeps, regular spot checks during construction, relocation of wildlife out of harm's way, and covering or providing escape routes within steep excavations to ensure avoidance of direct impacts to any special-status reptiles species. Accordingly, direct impacts to special-status reptiles would be less than significant with implementation of **MM-BIO-1**.

See MM-BIO-1 above.

### Special-Status Birds and Nesting Birds

Two special-status bird species were observed during biological surveys conducted on the project site: loggerhead shrike (*Lanius ludovicianus*) and yellow warbler (*Setophaga petechia*). An additional special-status bird species, LeConte's thrasher (*Toxostoma lecontei*), has a moderate potential to nest and forage

in the BSA where suitable habitat is present. There is no suitable habitat for yellow warbler within the BSA and no direct impacts to the species are expected to occur as a result of the project.

Suitable nesting and live-in habitat for loggerhead shrike is present within the BSA at work locations with flat, open topography (i.e., Tower 32-4, Tower Span 33-2 to 33-3, Tower Span 35-2 to 35-3, Tower Span 38-1 to 38-2, Tower Span 38-4 to 39-1, Tower Span 41-3 to 41-4, Tower 54-2, Tower 61-2). Loggerhead shrike nest sites are typically well concealed in a dense shrub or tree. Suitable nesting and live-in habitat for LeConte's thrasher is present within the BSA at work locations with desert scrub with spiny shrubs and cacti (i.e., Tower 32-4, Tower Span 33-2 to 33-3, and Tower Span 35-2 to 35-3). LeConte's thrasher nest sites are typically located in a well shaded portion of a densely growing saltbush (*Atriplex* spp.), cholla cacti (*Cylindropuntia* spp.), or sometimes other thorny or spiny shrubs or small trees. Although vegetation and ground clearance activities associated with construction would remove potential suitable habitat for these species, direct impacts would be less than significant given the small impact footprint compared with the abundant habitat in the surrounding vicinity. These areas will continue to provide habitat opportunities for this species, and the loss of suitable habitat would not cause the species population to drop below self-sustaining levels. Furthermore, areas impacted by proposed grading activities would be restored post-construction. As a result, direct impacts to suitable habitat for special-status birds would be less than significant absent mitigation.

Trees and shrub habitat within the proposed project provides suitable nesting habitat for these special-status bird species, as well as other bird species protected under the MBTA (16 USC 703-712) and California Fish and Game Code Sections 3503.5, 3503, and 3513. Vegetation removal or grading activities conducted during the general nesting bird season (February 1 through August 31) could result in the direct take of a bird (i.e., individuals, active nests, eggs, or young) if nesting within proposed disturbance areas during construction. Harm to or the loss of individuals during construction could be significant, absent minimization or mitigation. LADWP conducts pre-construction nesting bird surveys and avoidance as a BMP, which includes seasonal avoidance, pre-construction nesting bird surveys, avoidance buffers, or monitoring, as applicable. Accordingly, direct impacts to special-status birds and nesting birds protected under the MBTA and California Fish and Game Code would be less than significant.

### Special-Status Small Mammals

San Diego desert woodrat and southern grasshopper mouse have a moderate potential to occur in the BSA based on the presence of suitable habitat and known occurrences in the region.

Suitable habitat for San Diego desert woodrat is present throughout the BSA. Woodrat middens built from sticks, rocks, and a variety of materials are generally found in rock crevices and at bases of trees or shrubs. Suitable habitat for southern grasshopper mouse is present within the BSA at work locations with intact arid shrublands on flat, sandy valley floor (i.e., Tower 32-4, Tower Span 33-2 to 33-3, and Tower Span 35-2 to 35-3). Although vegetation and ground clearance activities associated with construction would remove potential suitable habitat for these species, direct impacts would be less than significant given the small impact footprint compared with the abundant habitat in the surrounding vicinity. These areas will continue to provide habitat opportunities for this species, and the loss of suitable habitat would not cause the species population to drop below self-sustaining levels. Furthermore, areas impacted by proposed grading activities would be restored post-construction. As a result, direct impacts to suitable habitat for special-status small mammals would be less than significant absent mitigation.

Construction activities could cause mortality and injury to a small number of individuals of these species in burrows or middens if present within the disturbance footprint at the start of construction. Any individuals that are flushed from burrows or middens by construction activities would also be highly vulnerable to stress and predation. Harm to or the loss of individuals during construction could be significant, absent mitigation. **MM-BIO-1** would require environmental training, pre-construction sweeps, regular spot checks during construction, relocation of wildlife out of harm's way, and covering or providing escape routes within steep excavations to ensure avoidance of direct impacts to any special-status small mammal species. Accordingly, direct impacts to special-status small mammals would be less than significant with implementation of **MM-BIO-1**.

See MM-BIO-1 above.

### American Badger

One special-status medium-sized mammal, American badger, was detected during biological surveys conducted on the project site. Specifically, burrows showing signs of recent badger activity were observed within the BSA at Tower Span 41-3 to 41-4. This species also has a moderate potential to occur at other project work locations.

Suitable habitat for American badger is present within the BSA at work locations with open habitat and loose soils (i.e., Tower 32-4, Tower Span 33-2 to 33-3, Tower Span 35-2 to 35-3, Tower Span 38-1 to 38-2, Tower Span 38-4 to 39-1, Tower 46-4, Tower Span 49-2 to 49-3). Although vegetation and ground clearance activities associated with construction would remove potential suitable habitat for these species, direct impacts would be less than significant given the small impact footprint compared with the abundant habitat in the surrounding vicinity. These areas will continue to provide habitat opportunities for this species, and the loss of suitable habitat would not cause the species population to drop below self-sustaining levels. Furthermore, areas impacted by proposed grading activities would be restored post-construction. As a result, direct impacts to suitable habitat for American badger would be less than significant absent mitigation.

Construction activities could cause mortality and injury to individuals in burrows if present within the disturbance footprint during construction. In addition, any individuals that are flushed from burrows by construction activities would also be highly vulnerable to stress and vehicle strikes. Harm to or the loss of individuals during construction could be significant, absent mitigation. Implementation of **MM-BIO-4** (American Badger Pre-Construction Surveys and Relocation) would require pre-construction surveys and provides avoidance measures if occupied or active natal dens are present. Implementation of **MM-BIO-1** would require environmental training, pre-construction sweeps, regular spot checks during construction, relocation of wildlife out of harm's way, and covering or providing escape routes within steep excavations to ensure avoidance of direct impacts to this species. Accordingly, direct impacts to American badger would be less than significant with implementation of **MM-BIO-1** and **MM-BIO-4**.

See MM-BIO-1 above.

**MM-BIO-4** American Badger Pre-Construction Surveys and Avoidance. A qualified biologist shall conduct a pre-construction survey for suitable American badger dens within 50 feet of the disturbance footprint (or within 100 feet during the maternity season – March 15 through July 31) no earlier than 5 days prior of the commencement of project activities at Tower

32-4, Tower Span 33-2 to 33-3, Tower Span 35-2 to 35-3, Tower Span 38-1 to 38-2, Tower Span 38-4 to 39-1, Tower Span 41-3 to 41-4, Tower 46-4, and Tower Span 49-2 to 49-3. The methods detailed below should also be implemented for any other work locations where suitable badger dens are found during pre-construction sweeps as required per MM-BIO-1. A suitable badger den would be characterized by its half-moon or elliptically shaped entrance, a large apron of loose dirt, and claw marks on the sides of the entrance.

**Initial Den Evaluations:** If suitable badger dens are found, each den shall be initially classified as vacant, potentially occupied, or definitely occupied. Pocket mirrors or flashlights may be used as an aide in evaluating den suitability for badger. For initial evaluations, occupancy would be determined with the following characteristics:

- A vacant den would be determined by the presence of cobwebs over the entrance and within the burrow or entrance obstruction with dirt, debris, or vegetation.
- A potentially occupied den would be determined by the presence of scat, tracks, prey remains, hair, previous apron diggings, dirt berms, matted vegetation near the den entrance, or a lingering musty scent.
- A definitely occupied den would be determined by a dirt apron with fresh diggings and tracks.

Vacant burrows will be immediately collapsed if within the project footprint or covered with a sandbag and wooden board if within the 50-foot buffer. If a definitely occupied den occurs within 50 feet of the disturbance footprint, then the den location shall be clearly marked with fencing or flagged stakes to avoid inadvertent impacts on the den. A biologist must actively monitor the occupied den during all construction activities and shall halt work if a badger leaves the den and is in close proximity to active heavy machinery. If a definitely occupied den occurs within the disturbance footprint, a qualified biologist will implement passive relocation and burrow excavation phases detailed below.

**Reproductive Dens:** If an active natal den (for giving birth) or maternal den (for rearing kits) is identified during the maternity season (March 15 through July 31), construction activities shall be postponed or halted within 100 feet of the reproductive den until it is determined by the project biologist that the young are no longer dependent on the reproductive den. Any active reproductive den shall be clearly marked with flagged stakes in a manner that will not inhibit behavioral activities of the mother and kits (e.g., foraging and dispersal). Passive relocation or den excavation shall not occur if the occupied den is determined to be an active reproductive den.

**Passive Relocation:** Upon completion of camera monitoring and after definite occupancy has been determined, the den shall be progressively blocked with natural materials (i.e., sticks piled in front of the entrances) for the next 3 nights to discourage the badger from continued use. Game cameras that were previously installed during the camera monitoring phase will be left in place to assist in determination of subsequent badger activity and departure from the den.

**Burrow Excavation:** Once the qualified biologist has determined that American badger is not likely to be present after passive relocation efforts have been completed, then the den shall be excavated and backfilled carefully to ensure that no badgers are trapped in the den. If sign of current badger use is discovered, the excavation process shall cease immediately and the camera monitoring protocol will resume. Excavation will resume once the qualified biologist has again determined that American badger is no longer present. Den excavation shall consist of the use of hand shovels and other hand tools, to carefully remove dirt to ensure no harm to American badger that may still be inside the den. Destruction of the den is considered to be completed when the animal has escaped from the partially destroyed den or when the den cavity is fully excavated, filled with dirt, and compacted to ensure that badgers cannot re-enter or use the den during the construction period.

### Indirect Impacts

Indirect impacts to special-status wildlife species, such as fugitive dust, erosion, runoff, sedimentation, chemical pollution, litter, and accidental clearing, grading, or trampling, may result in both habitat degradation and effects on individuals. Trash generated by construction personnel, such as food packaging and cigarette butts, and debris from construction-related materials may be dispersed into natural areas by wind and water and can degrade wildlife habitat and can attract nuisance and pest species that affect several of the wildlife guilds. These indirect impacts would be significant absent mitigation. Implementation of **MM-BIO-1** will reduce potential impacts to a less-than-significant level through environmental training, biological monitoring, verification of the SWPPP, and general monitoring of the BMPs. Additionally, **MM-BIO-2** requires installation of temporary construction fencing and/or staking to identify the limits of grading/disturbance, which would reduce potential human trampling outside of the construction limits. Furthermore, implementation of BMPs would include sediment control, spraying to minimize fugitive dust, trash containment, and hazardous materials spill containment.

Construction noise and vibration may disturb avian breeding activities, potentially resulting in nest abandonment or reduced productivity if vegetation removal or grading activities are conducted during the general nesting bird season (February 1 through August 31). Noise has the potential to disrupt sleep, incubation, or feeding activities, as well as mate attraction and territory defense by masking calls. Under the MBTA and California Fish and Game Code Sections 3503.5, 3503, and 3513, indirect impacts to individual special-status and native birds, active nests, or the young of nesting special-status and native bird species would be considered significant, absent mitigation. Standard BMPs implemented by LADWP includes pre-construction nesting bird surveys, which would require seasonal avoidance, pre-construction nesting bird surveys within 300 feet (500 feet for raptors) of the proposed impact areas, avoidance buffers, or monitoring, as applicable.

For the reasons detailed above, potential indirect impacts to special-status wildlife species would be less than significant with implementation of BMPs, **MM-BIO-1**, and **MM-BIO-2**.

See MM-BIO-1 and MM-BIO-2 above.

**b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less-than-Significant Impact with Mitigation Incorporated. The BSA supports 27 vegetation communities and 3 unvegetated or developed land cover types, of which there are five special-status vegetation communities: Joshua tree woodland, narrowleaf goldenbush-bladderpod scrub (*Ericameria linearifolia* association), California juniper woodland (*Juniperus californica*/herbaceous association), fiddleneck-phacelia fields (*Phacelia tanacetifolia* association), and desert almond-Mexican bladdersage Scrub (*Salazaria mexicana* association). As stated in Section 5.1 of Appendix C, Vegetation Communities and Land Covers, CDFW state rankings of 1, 2, or 3 are considered high priority for inventory or special-status communities and impacts to these communities typically require mitigation. Although not given a ranking, narrowleaf goldenbush-bladderpod scrub (*Ericameria linearifolia* association), fiddleneck-phacelia fields (*Phacelia tanacetifolia* association), and desert almond-Mexican bladdersage Scrub (*Salazaria mexicana* association) are considered sensitive by CDFW. Additionally, open water is jurisdictional under regulatory agencies, and therefore, included as a special-status land cover type.

Table 3.4-1 summarizes permanent and temporary impacts to special-status vegetation communities from the proposed project. There are no proposed impacts to California juniper woodland (*Juniperus californica*/herbaceous association) or open water; therefore, this community and land cover type are not further addressed.

**Table 3.4-1. Project Impacts to Special-Status Vegetation Communities and Land Covers**

| Common Name                                      | Alliance                                                                            | Association                                | Temporary Ground Disturbance Impacts (acres) | Temporary Staging Impacts (acres) | Total Temporary Impacts (acres) | Remaining in BSA after Temporary Impacts (acres) |
|--------------------------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------|----------------------------------------------|-----------------------------------|---------------------------------|--------------------------------------------------|
| <b>Grass and Herb Dominated</b>                  |                                                                                     |                                            |                                              |                                   |                                 |                                                  |
| Fiddleneck-Phacelia Fields                       | <i>Amsinckia (menziesii, tessellata)</i> - <i>Phacelia</i> spp. Herbaceous Alliance | <i>Phacelia tanacetifolia</i> Association  | <0.01                                        | 0.00                              | <0.01                           | 0.37                                             |
| <i>Total Grass and Herb Dominated Vegetation</i> |                                                                                     |                                            | <0.01                                        | 0.00                              | <0.01                           | 0.37                                             |
| <b>Scrub Communities</b>                         |                                                                                     |                                            |                                              |                                   |                                 |                                                  |
| Narrowleaf Goldenbush - Bladderpod Scrub         | <i>Ericameria linearifolia</i> - <i>Cleome isomeris</i> Shrubland Alliance          | <i>Ericameria linearifolia</i> Association | 0.00                                         | 0.54                              | 0.54                            | 1.97                                             |

**Table 3.4-1. Project Impacts to Special-Status Vegetation Communities and Land Covers**

| Common Name                                             | Alliance                                                                 | Association                                          | Temporary Ground Disturbance Impacts (acres) | Temporary Staging Impacts (acres) | Total Temporary Impacts (acres) | Remaining in BSA after Temporary Impacts (acres) |
|---------------------------------------------------------|--------------------------------------------------------------------------|------------------------------------------------------|----------------------------------------------|-----------------------------------|---------------------------------|--------------------------------------------------|
| Desert Almond–Mexican Bladdersage Scrub                 | <i>Prunus fasciculata</i> – <i>Salazaria mexicana</i> Shrubland Alliance | <i>Salazaria mexicana</i> Association                | 0.23                                         | 0.00                              | 0.23                            | 0.42                                             |
| <i>Total Scrub Vegetation</i> <sup>2</sup>              |                                                                          |                                                      | 0.23                                         | 0.54                              | 0.77                            | 2.39                                             |
| <b>Woodland Communities</b>                             |                                                                          |                                                      |                                              |                                   |                                 |                                                  |
| California Juniper Woodland                             | <i>Juniperus californica</i> Woodland Alliance                           | <i>Juniperus californica</i> /herbaceous Association | 0.00                                         | 0.00                              | 0.00                            | 0.34                                             |
| Joshua Tree Woodland                                    | <i>Yucca brevifolia</i> Woodland Alliance                                | NA                                                   | 0.00                                         | 0.16                              | 0.16                            | 0.81                                             |
| <i>Total Woodland Vegetation</i> <sup>2</sup>           |                                                                          |                                                      | 0.00                                         | 0.16                              | 0.16                            | 1.15                                             |
| <b>Unvegetated and Developed Land Cover Types</b>       |                                                                          |                                                      |                                              |                                   |                                 |                                                  |
| Open Water                                              | NA                                                                       | NA                                                   | 0.00                                         | 0.00                              | 0.00                            | <0.01                                            |
| <i>Total Unvegetated and Developed Land Cover Types</i> |                                                                          |                                                      | 0.00                                         | 0.00                              | 0.00                            | <0.01                                            |
| <b>Total</b> <sup>1</sup>                               |                                                                          |                                                      | <b>0.23</b>                                  | <b>0.70</b>                       | <b>0.93</b>                     | <b>3.91</b>                                      |

Notes: NA = not applicable.

<sup>1</sup> Subtotals may not sum to total due to rounding.

### Direct Impacts

The project would only result in temporary impacts as the project is an existing transmission line and does not involve construction of any additional roads or structures. Additionally, all areas where grubbing, grading, or other ground disturbance activities are proposed to occur would be restored back to the original state during the site rehabilitation phase and would be considered temporary. Areas where staging or tower raising activities are proposed to occur would not involve ground disturbance and would also be considered temporary.

A total of 0.93 acres would be directly temporarily impacted by the project to the following four vegetation communities within the BSA: Joshua tree woodland, narrowleaf goldenbush–bladderpod scrub (*Ericameria linearifolia* association), fiddleneck–phacelia fields (*Phacelia tanacetifolia* association), and desert almond–Mexican bladdersage scrub (*Salazaria mexicana* association) (Table 3.4-1). Temporary impacts will be restored following the completion of construction activities as described in Section 3.4(a). Additionally, impacts to these special-status vegetation communities and land covers are proposed to be minimal and spread out over a large area, consisting of 7.5% of the total project impact area and 1.8% of the BSA. Therefore, direct impacts to special-status vegetation communities would be less than significant.

## Indirect Impacts

Potential short-term indirect impacts to special-status vegetation communities and land covers within the BSA would be the same as those described for special-status plants, and would primarily result from construction activities including 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 vegetation communities are considered significant absent mitigation.

Implementation of **MM-BIO-1** will reduce potential impacts to a less-than-significant level through environmental training, biological monitoring, verification of the SWPPP, and general monitoring of the BMPs. Additionally, **MM-BIO-2** requires installation of temporary construction fencing and/or staking to identify the limits of grading/disturbance, which would reduce potential human trampling outside of the construction limits. Furthermore, implementation of BMPs would include sediment control, spraying to minimize fugitive dust, trash containment, and hazardous materials spill containment. Accordingly, potential indirect impacts to special-status vegetation communities and land cover types would be less than significant with implementation of BMPs, **MM-BIO-1**, and **MM-BIO-2**.

See MM-BIO-1 and MM-BIO-2 above.

- c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

**Less-than-Significant Impact.** Potentially jurisdictional wetlands and waters were not identified within the project impact footprint or BSA. Therefore, there would be no direct impacts to jurisdictional wetlands and waters.

Although not occurring within the project footprint, there are potentially jurisdictional wetlands and waters located in the surrounding vicinity and/or downslope from some proposed work locations (i.e., Tower 57-2, Tower 61-2, and Tower Span 70-4 to 71-1).

Potential indirect impacts could result from construction activities and would include impacts from the generation of fugitive dust and the potential introduction of chemical pollutants. Excessive dust can decrease the vigor and productivity of vegetation through effects on light, penetration, photosynthesis, respiration, transpiration, increased penetration of phytotoxic gaseous pollutants, and increased incidence of pests and diseases. Erosion and the release of chemical pollutants (releases of fuel, oil, lubricants, paints, release agents, and other construction materials) can reduce the water quality downstream and degrade associated habitats. Indirect impacts to potentially jurisdictional resources would be avoided through implementation of BMPs, such as sediment control, spraying to minimize fugitive dust, trash containment, and hazardous materials spill containment and impacts would be less than significant.

- d) *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

### **Wildlife Corridors and Habitat Linkages**

**Less-than-Significant Impact.** As described in Section 5.3.2 of Appendix C, a few work locations within the proposed project occurs within the San Gabriel-Castaic Connection of the South Coast Missing Linkages (Tower Span 57-1 to 57-2 and Tower 57-2) and in areas identified as a Natural Landscape Block or Essential Connectivity Areas in the CEHC Project (Tower 54-2, Tower Span 57-1 to 57-2, Tower 57-2, and Tower 61-2). In addition, most of the work locations for the proposed project support natural vegetation communities and are located within sparsely developed to almost completely undeveloped areas that would provide live-in habitat for wildlife and allow for wildlife movement to nearby undeveloped natural spaces.

During construction, wildlife may be deterred from the construction area due to increased human presence, loud noises, and physical changes to habitat. However, construction will be temporary at any location throughout the project, and wildlife would be able to use temporary construction areas freely after work crews are gone. Since the proposed project is dispersed and occurring within an existing transmission line, typical construction methods would not impede wildlife movement over a large area at any one time. Work areas would remain unfenced during and after construction. Additionally, work is proposed to occur primarily during daylight hours when most wildlife movement is not anticipated to occur. As such, temporary impacts to wildlife movement would be less than significant.

No additional structures other than those existing on the transmission line are proposed to be built. In the long term, modifications would only be made to existing structures and access roads, as well as minor topographical changes from grading activities to achieve height consistency. Any removal of habitat would be restored with native vegetation following construction, and none of the proposed grading activities would create any landform changes that would impede wildlife movement. Therefore, permanent impacts due to loss of habitat would be less than significant.

### **Native Wildlife Nursery Sites**

**Less-than-Significant Impact.** The project does not support native nursery sites in the form of bird rookeries, large maternal or overwintering bat roosts, large roosting trees or structures for non-colony bats, or fisheries. However, vegetation throughout the BSA at all work locations could provide suitable nesting habitat for many species of native birds. Vegetation removal or grading activities conducted during the general nesting bird season (February 1 through August 31) could result in the direct take of a bird (i.e., individuals, active nests, eggs, or young) if nesting within proposed disturbance areas and vicinity during construction. Standard BMPs implemented by LADWP includes pre-construction nesting bird surveys, which would ensure that the implementation of the project would not interfere with the nesting of any native bird species with seasonal avoidance, pre-construction nesting bird surveys, avoidance buffers, or monitoring, as applicable. Accordingly, impacts to native wildlife nursery sites would be less than significant.

e) **Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

Less-than-Significant Impact with Mitigation Incorporated. Applicable local ordinances protecting biological resources within the biological study area include the County of Los Angeles Significant Ecological Area (SEA) Ordinance, the County of Los Angeles Oak Tree Ordinance, the City of Santa Clarita Oak Tree Ordinance, the City of Los Angeles Protected Tree Ordinance, and the locally enforced California Desert Native Plants Act. Biological resources protected under these ordinances and policies are present within the BSA. These ordinances and proposed mitigation measures to ensure compliance are discussed below.

### County of Los Angeles Oak Tree Ordinance

Oak trees that may meet the size criteria for protection under this ordinance were observed in the BSA at work locations occurring within unincorporated Los Angeles County (Appendix C Figure 4C). Tucker oak chaparral (*Quercus john-tuckeri* Association) that may contain Tucker oak trees that meet the County-protected size were mapped at Tower 43-2 and Tower Span 49-2 to 49-3 (Appendix C Figure 4I and Figure 4K).

The County of Los Angeles Oak Tree Ordinance requires that all potential impacts to oak trees regulated by this ordinance be preceded by a permit application to the County that includes a detailed oak tree report. Mitigation for impacts to oak trees is usually required as a condition of an Oak Tree Permit issued by the County. **MM-BIO-5** (Protected Tree Inventory) would require a protected tree inventory and permitting, if necessary, for potentially impacted trees prior to construction. Therefore, impacts to oak trees protected under the County of Los Angeles Oak Tree Ordinance would be less than significant with implementation of **MM-BIO-5**.

**MM-BIO-5** Protected Tree Inventory. Protected trees within the potential impact areas that meet the minimum size requirements defined in the County of Los Angeles Protected Tree Ordinance or City of Los Angeles Protected Trees Ordinance, as applicable, will be avoided or mitigated through County or City permitting and mitigation requirements. To mitigate for impacts to protected trees that cannot be avoided, permit applications must be submitted and approved prior to construction to the applicable jurisdiction (Los Angeles County and/or City of Los Angeles). Mitigation requirements or permit conditions must be implemented as stipulated in approved permits.

### City of Santa Clarita Oak Tree Ordinance

No oak trees were observed in the BSA at the work location occurring within the City of Santa Clarita, Tower Span 65-4 to 66-1. Therefore, no impacts to oak trees protected under the City of Santa Clarita Oak Tree Ordinance would occur as a results of project implementation.

### City of Los Angeles Protected Tree Ordinance

Blue elderberry shrubs that may meet the size criteria for protection under this ordinance were observed in the BSA at work locations occurring within the City of Los Angeles, Towers 76-5 and 77-1 (Appendix C Figure 4A).

The City of Los Angeles Protected Tree Ordinance requires that all potential impacts to tree or shrub species regulated by this ordinance be preceded by a permit application to the City that includes a detailed protected tree and shrub report. Mitigation for impacts to protected trees and shrubs is usually required as a condition of a protected tree permit issued by the City of Los Angeles. **MM-BIO-5** would require a protected tree and shrub inventory and permitting, if necessary, for potentially impacted trees prior to construction. Therefore, impacts to trees and shrubs protected under the City of Los Angeles Protected Tree Ordinance would be less than significant with implementation of **MM-BIO-5**.

See MM-BIO-5 above.

### California Desert Native Plants Act

In addition to western Joshua tree, two desert native plant species were mapped within the BSA: Wiggins' cholla and chaparral yucca. Three Wiggins' cholla were mapped within the BSA at Tower 32-4 (Appendix C Figure 4Q); 27 chaparral yucca individuals were mapped within the BSA at Tower Span 33-2 to 33-3 (Appendix C Figure 4P); one chaparral yucca individual was mapped within the BSA at Tower Span 41-3 to 41-4 (Appendix C Figure 4L); and 12 chaparral yucca individuals were mapped within the BSA at Tower 43-2 (Appendix C Figure 4K). Of these, up to 23 chaparral yucca may require salvage and relocation. Western Joshua tree occurs within the project; however, no removal or trimming is necessary for project implementation. Accordingly, a permit pursuant to the California Desert Native Plant Act is not necessary for this species.

For all desert native plants that cannot be avoided, the California Desert Native Plants Act requires that all impacts to protected native desert plants regulated by this law be preceded by issuance of a permit by the County in accordance with Food and Agricultural Code Division 23. **MM-BIO-6** (Relocation of Desert Native Plants) would require submittal of a permit application form and an applicable fee to the County of Los Angeles, proper handling of tags or seals issued with the permit, and additional actions that would ensure successful transplantation of salvaged plants. Therefore, impacts to plant species protected under the California Desert Native Plants Act would be less than significant with implementation of **MM-BIO-6**.

**MM-BIO-6** **Relocation of Desert Native Plants.** If it has been determined that protected native desert plants cannot be avoided, LADWP shall apply for a permit with the County of Los Angeles for removal or relocation of protected native desert plants as required under California Desert Native Plants Act (Food and Agricultural Code, Division 23). The permit application form shall specify information outlined in the California Desert Native Plant Act Section 80114, which includes but is not limited to, the number and species of native plants to be relocated, a description of the real property from which the plants are to be removed, the destination of the native plants, and the manner in which the plants are to be salvaged. Pursuant to the California Desert Native Plants Act, tags or seals issued by the County must be attached to the native plants at the time of harvesting and before transporting to their permanent relocation site(s) and must remain attached to the plant until transplanted into its ultimate destination. Transport of salvaged plants will occur as prescribed by the County. The following actions shall also be implemented to ensure successful relocation of desert native plants for which salvage is necessary:

- Salvaged plants shall be transplanted expeditiously to either their final on-site location or to an approved off-site area. If the plants cannot be expeditiously taken to their

permanent relocation area at the time of excavation, they may be transplanted in a temporary area (stockpiled) prior to being moved to their permanent relocation site(s).

- Transplanted plants shall be watered prior to and at the time of transplantation. Watering of the transplanted plants shall continue until it has been determined that the transplants have become established in the permanent relocation site(s) and no longer require supplemental watering.

### County of Los Angeles Significant Ecological Area Ordinance

The BSA at a few work locations occur within a County of Los Angeles designated SEA (County of Los Angeles 2023). The BSA at Tower Span 57-1 to 57-2, Tower 57-2, and Tower Span 70-4 to 71-1 partially overlaps with the Santa Clara River SEA, and the BSA at Tower Span 33-2 to 33-3 partially overlaps with the Antelope Valley SEA. However, this project is exempt from regulations pertaining to the Los Angeles County SEA Ordinance per Los Angeles County Code 22.102.040 (Exemptions), which provides an exemption for “emergency or routine maintenance by a public utility necessary to protect or maintain essential components of an existing utility or transmission system”. Therefore, the project is exempt from the ordinance. However, with the implementation of **MM-BIO-1** through **MM-BIO-6**, impacts to biological resources protected by the ordinance would be less than significant.

See MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-BIO-4, MM-BIO-5, and MM-BIO-6 above.

- f) ***Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

No Impact. The project is not located within an area covered under any habitat conservation plan (HCP), natural community conservation plan (NCCP), or other approved local, regional, or state conservation planning areas (CDFW 2019). Therefore, the project would not be in conflict with any such plan. Accordingly, no impact would occur.

## 3.5 Cultural Resources

| Would the project:                                                                                             | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?      | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>     | <input type="checkbox"/>            |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries?                        | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>     | <input type="checkbox"/>            |

The evaluation of potential impacts on cultural resources is based on a Phase I Cultural Resources Inventory Report prepared by Dudek in 2024 (Appendix D) in support of the project. Inventory efforts included a California Historical Resources Information System (CHRIS) database records search conducted at the South Central Coastal Information Center (SCCIC), searches of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) in 2022 and 2024, a review of historical topographic maps and aerial photographs, and a cultural resources pedestrian survey of the project area.

## Records Search

The SCCIC records search included a review of all previously recorded investigations and cultural resources within a 0.5-mile radius of the project area. Overall, the records search indicates that 27 cultural resources have been previously recorded within 0.5 miles of the project area. Though none of the previously recorded resources are located within the project area, two are located in proximity to Tower 77-1. These include P-19-004226, a prehistoric groundstone and lithic scatter, and P-19-190043, a historic-era built environment resource identified as the Bull Creek Extension Channel. P-19-004226 has not been evaluated for listing on the California Register of Historical Resources (CRHR), while P-19-190043 was recommended ineligible by Dietler, Kry, and Gibson in 2012 (Dietler et al. 2012). Overall, the previously recorded cultural resources within the 0.5-mile records search radius include seven prehistoric archaeological sites, seven historic-era archaeological sites, one multicomponent site, one multicomponent archaeological district, two prehistoric isolates, eight built environment resources, and one resource of unknown origin. Of note, six resources (one prehistoric archaeological site and five historic-era archaeological sites) are located within 0.5 miles of Tower Span 65-4 to 66-1, and an additional three resources (two prehistoric archaeological sites and one multicomponent archaeological district) are located within 0.5 miles of Towers 76-5 and 77-1.

## Archival Research

Dudek consulted historical topographic maps and aerial photographs through Nationwide Environmental Title Research LLC (NETR) to better understand any natural or human-made changes to the project area and surroundings over time. A review of available topographic maps included maps dated from 1900 to 2022. A review of historical aerial photographs included photographs dated from 1947 to 2020 (NETR 2025). Overall, Dudek's review of topographic maps and historical aerials photographs show that although sections of the ADL-RIN L1 transmission line were constructed prior to the 1950s, the portions of the transmission line that overlap and are contained within the project area were not present as depicted in the historical aerials until the 1980s. Due to the quality of some images, in some cases, the transmission line was not visible until the 1990s; however, ground disturbances such as graded roads, and vegetation clearing where the transmission line towers were placed can be seen in the historical aerials from the 1980s. Prior to the construction of the ADL-RIN L1 transmission line, the project area was largely undeveloped. Since the portions of the ADL-RIN L1 transmission line that overlap and are contained within the project area are less than 45 years old, this built environment feature does not meet the minimum age threshold to be considered a historical resource under CEQA.

## Built Environment Review

Preliminary desktop research indicates that portions of the project area are located within land considered part of the Golden Oak Ranch property (19802 Placerita Canyon Road, Newhall, California 91321) which has not been evaluated for significance but may be eligible for consideration as a CEQA historical resource. However, the project is limited to alterations and upgrades to one Tower Span within this area: 70-4 to 71-1. These towers are not yet 45 years of age and thus do not meet the minimum age threshold to be considered a historical resource under

CEQA. In consideration of the proposed ground clearance and roadway improvements being limited to areas directly adjacent to the Towers and Tower Spans, and the fact that these Towers would not be considered contributing elements of the Golden Oak Ranch property even if it was found to meet historical significance eligibility requirements, Dudek concludes that there are no potential CEQA impacts that need to be considered that would require the evaluation of the Golden Oak Ranch property. As such, Dudek concludes that no built environment buildings or structures requiring identification or evaluation under CEQA will be impacted by the project.

### Native American Heritage Commission Sacred Lands File Search

LADWP requested an NAHC search of the SLF for the project area on August 2, 2022. The SLF consists of a database of known Native American resources. These resources may not be included in the SCCIC database. The NAHC replied via email on September 12, 2022, stating that the SLF search was completed with negative results. Additionally, the NAHC provided a list of 26 California Native American tribal representatives from 19 distinct tribes that should be contacted for more information on potential tribal sensitivities regarding the project.

Dudek requested an updated NAHC search of the SLF for the project area and a 0.5-mile radius on February 14, 2024. The NAHC replied via email on March 1, 2024, stating that the SLF search was completed with positive results, but did not provide details on what the resource(s) are or where they are located. Positive results indicate the presence of Native American cultural resources within 0.5 miles of the project area and not necessarily directly within the project area. The NAHC additionally provided a list of 30 California Native American tribal representatives from 18 distinct tribes that should be contacted for more information on potential tribal sensitivities regarding the project.

### Pedestrian Survey

Dudek archaeologists conducted an intensive-level cultural resources pedestrian survey of the project area on April 15 and 16, 2024. All survey work was conducted using standard archaeological procedures and techniques consistent with Secretary of the Interior's Standards and Guidelines for archaeology. When possible, 10-meter interval survey transects were conducted, oriented in north-south or east-west cardinal directions at each work area.

Overall, the project area was predominantly covered in a moderate to dense amount of vegetation, including several species of invasive grasses, mustard (*Brassica* spp.), chamise (*Adenostoma* sp.), coyote brush (*Baccharis pilularis*), and sagebrush (*Artemisia* spp.). Consequently, visibility was poor (0%–25%) in areas of dense vegetation, and fair (25%–40%) along dirt access roads and within areas that contained rocky outcrops and high-lying bedrock. The majority of the work areas were within hillsides with high degrees of slope. Throughout the project area, there was evidence of various disturbances such as modern dumping (trash and other debris), grading for access roads, vehicle overland travel, grading along the transmission line and surrounding areas, as well as active erosion along the steeper hillsides.

The pedestrian survey identified one prehistoric isolate within the 100-foot corridor work area at Tower Span 35-2 to 35-3. This isolate was given the temporary field identification number: LADWP-CK-I-001. This prehistoric resource consists of one cryptocrystalline silicate projectile point. The resource was formally recorded and left *in situ*. Isolates are categorically ineligible for listing on the CRHR and are not considered unique archaeological resources under CEQA. Under CEQA, isolates do not require additional treatment other than formal documentation. No other cultural resources were identified within the project area during the pedestrian survey.

**a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?***

**No Impact.** As defined by the CEQA Guidelines (14 CCR 15000 et seq.), a “historical resource” is considered to be a resource that is listed in or eligible for listing in the National Register of Historic Places or CRHR, has been identified as significant in a historical resource survey, or is listed on a local register of historical resources. Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; 14 CCR 15064.5[b]). If a site is listed or eligible for listing in the CRHR, included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code [PRC] Section 5024.1[q]), it is a historical resource and is presumed to be historically or culturally significant for the purposes of CEQA (PRC Section 21084.1; 14 CCR 15064.5[a]).

A review of historical topographic maps and aerial photographs indicates that the project area has been subject to past ground disturbances associated with road grading, vegetation clearing, and the construction of the ADL-RIN L1 transmission line in the 1980s. Additionally, the SCCIC records search identified no previously recorded cultural resources within the project area, though two resources (P-19-004226 and P-19-190043) were identified within proximity to Tower 77-1. Two NAHC SLF searches were also conducted for the project area, and the 2024 results were positive for Native American cultural resources within the search area (the project area and surrounding 0.5-mile radius), though the NAHC did not provide details on what the resource(s) are or where they are located. Though the pedestrian survey of the project area identified one prehistoric isolate within the 100-foot corridor work area at Tower Span 35-2 to 35-3, isolates are categorically ineligible for listing on the CRHR and are not considered unique archaeological resources under CEQA.

As no historical resources were identified with the project area during Dudek’s Phase I cultural resources inventory in support of the project, the project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. There would be no impact.

**b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?***

**Less-than-Significant Impact with Mitigation Incorporated.** As discussed above, the SCCIC records search and archival research did not identify any prehistoric or historic-era archaeological resources in the project area. However, the results of the 2024 NAHC SLF search were positive for Native American cultural resources within 0.5 miles of the project area. Additionally, the pedestrian survey identified one prehistoric isolate (LADWP-CK-I-001) within the 100-foot corridor work area at Tower Span 35-2 to 35-3. Isolates are categorically ineligible for listing on the CRHR and are not considered unique archaeological resources under CEQA.

While no known archaeological resources were identified that would be impacted by the project, there is a moderate potential for the inadvertent discovery of archaeological resources during project implementation at Tower Span 35-2 to 35-3 due to the results of the pedestrian survey, and at Tower Span 65-4 to 66-1 and Towers 76-5 and 77-1 due to the results of the SCCIC records search. The remaining work areas are considered to have a low potential for the inadvertent discovery of archaeological resources due to the steepness of the slopes making these work areas unsuitable for sustaining buried archaeological resources.

If yet unknown archaeological resources, possessing the characteristics outlined in CEQA as significant, exist, and are inadvertently encountered during implementation (i.e., construction) of the project, there is potential for a substantial adverse change in the significance of an archaeological resource to occur. As such, mitigation is required to address impacts related to the inadvertent discovery of archaeological resources during construction, as outlined in **MM-CUL-1**, **MM-CUL-2**, and **MM-CUL-3**. **MM-CUL-1** requires full-time archaeological monitoring during initial ground-disturbing activities at Tower Spans 35-2 to 35-3 and 65-4 to 66-1, and Towers 76-5 and 77-1. **MM-CUL-2** requires construction work occurring within 60 feet of an archaeological resources discovery be immediately halted until a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for archaeology, in coordination with interested consulting tribes, can assess and evaluate the discovery pursuant to CEQA. Additionally, **MM-CUL-3** requires post-construction reporting. With implementation of **MM-CUL-1**, **MM-CUL-2**, and **MM-CUL-3**, potentially significant impacts to unknown archaeological resources would be reduced to less than significant with mitigation incorporated.

See Table 3.5-1 below for an overview of the mitigation measures required at each work area for the project.

**Table 3.5-1. Work Area Mitigation Measures**

| Tower Number or Tower Span | Management Recommendations                 |
|----------------------------|--------------------------------------------|
| 32-4                       | MM-CUL-2 and MM-CUL-4                      |
| 33-2 to 33-3               | MM-CUL-2 and MM-CUL-4                      |
| 35-2 to 35-3               | MM-CUL-1, MM-CUL-2, MM-CUL-3, and MM-CUL-4 |
| 38-1 to 38-2               | MM-CUL-2 and MM-CUL-4                      |
| 38-4 to 39-1               | MM-CUL-2 and MM-CUL-4                      |
| 41-3 to 41-4               | MM-CUL-2 and MM-CUL-4                      |
| 43-2                       | MM-CUL-2 and MM-CUL-4                      |
| 46-4                       | MM-CUL-2 and MM-CUL-4                      |
| 49-2 to 49-3               | MM-CUL-2 and MM-CUL-4                      |
| 54-2                       | MM-CUL-2 and MM-CUL-4                      |
| 57-1 to 57-2               | MM-CUL-2 and MM-CUL-4                      |
| 57-2                       | MM-CUL-2 and MM-CUL-4                      |
| 61-2                       | MM-CUL-2 and MM-CUL-4                      |
| 65-4 to 66-1               | MM-CUL-1, MM-CUL-2, MM-CUL-3, and MM-CUL-4 |
| 70-4 to 71-1               | MM-CUL-2 and MM-CUL-4                      |
| 76-5                       | MM-CUL-1, MM-CUL-2, MM-CUL-3, and MM-CUL-4 |
| 77-1                       | MM-CUL-1, MM-CUL-2, MM-CUL-3, and MM-CUL-4 |

**MM-CUL-1** Archaeological Monitoring. A qualified archaeologist shall be assigned to monitor project-related ground-disturbing activities that have a reasonable likelihood of encountering archaeological resources. The archaeological monitor shall work under the direction of a qualified Principal Investigator (i.e., an archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards for archaeology). A qualified archaeologist shall prepare a cultural resources monitoring plan (CRMP) for the project prior to construction mobilization. The plan shall outline areas of high sensitivity for the project, define monitoring locations, describe archaeological and Native American

monitoring procedures, outline notification procedures, establish key staff, and identify treatment measures for potential inadvertent discoveries of cultural resources and tribal cultural resources. The CRMP shall be written to ensure compliance with appropriate state and federal laws and be reviewed for approval by LADWP and the project's interested consulting Tribe(s). Before initiating ground-disturbing activities, a brief awareness training session for the benefit of all construction workers and supervisory personnel will be provided. The training, which could be held in conjunction with the project's initial on-site safety meeting, shall explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall be notified of the proper procedures to follow in the event that archaeological resources or human remains are uncovered during ground-disturbing activities. These procedures include immediately contacting the site supervisor and monitor(s) and work curtailment or redirection should archaeological resources be encountered during construction. If disturbed sediments (e.g., fill) or other sediments and formations are identified that do not have the potential to contain archaeological resources, then monitoring may be reduced or terminated. The CRMP and training presentation shall be available to additional supervisory or construction personnel who may join after project construction has begun.

MM-CUL-2 *Inadvertent Discovery.* In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, and in accordance with California Public Resources Code Section 21083.2(i), all construction work occurring within 60 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology can evaluate the significance of the find and determine appropriate treatment for the resource in accordance with the provisions of CEQA Guidelines Section 15064.5 and the National Historic Preservation Act. Construction activities may continue in other areas, or use existing paths of travel, but should be redirected a safe distance from the find. Avoidance and/or preservation in place should be considered the preferred management approach wherever possible.

If the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. A data recovery plan shall be developed by the qualified archaeologist in consultation LADWP and interested consulting Tribe(s), if applicable. Work in the area may not resume until evaluation and treatment of the resource is completed or the resource is recovered and removed from the site. Construction activities may continue on other parts of the construction site while the evaluation and treatment of archaeological resources take place.

MM-CUL-3 *Post-Construction Reporting.* If monitoring is conducted, an archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance and submitted LADWP for review. This report shall document compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the South Central Coastal Information Center and interested consulting Tribe(s).

**c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?**

Less-than-Significant Impact with Mitigation Incorporated. No prehistoric or historic-era burials, including those interred outside of formal cemeteries, were identified within the project area as a result of the SCCIC records search, the NAHC SLF searches, archival research, or pedestrian survey. Based on the nature of the construction activities proposed for the project (primarily vegetation clearing), the likelihood of disturbing human remains is low. However, the possibility of encountering human remains within the project area exists. In the event that human remains are inadvertently encountered during project construction activities, impacts to these resources would be potentially significant.

Thus, mitigation is required to address impacts related to the inadvertent discovery of human remains, as outlined in **MM-CUL-4**. Adherence to this measure will ensure that impacts to human remains resulting from the project would be less than significant.

**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 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 NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify the person or persons it believes to be the Most Likely Descendant (MLD) from the deceased Native American. The MLD shall complete inspection and make recommendations for the treatment and disposition, in consultation with LADWP, of the human remains within 48 hours of being granted access to the site.

### 3.6 Energy

| Would the project:                                                                                                                                                                | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?                                                                                     | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

Based on the type and location of construction activities for the proposed project, the energy demand associated with the project would be petroleum use in the form of diesel, gas and/or jet fuel for

construction equipment. Electricity and natural gas are not anticipated to be used and are not discussed further in this assessment.

According to the U.S. Energy Information Administration (EIA), California used approximately 524 million barrels of petroleum in 2020, with the majority (433 million barrels) used for the transportation sector, which was a substantial reduction from 2019 (659 million barrels of petroleum) due to the COVID-19 pandemic (EIA 2023). According to the U.S. Energy Information Administration’s “Energy Outlook 2021,” it may take years for the United States to return to 2019 levels of energy consumption following the impact of COVID-19 on the U.S. economy and global energy sector (EIA 2021). There are 42 U.S. gallons in a barrel, and in 2020 the total daily use of approximately 60.3 million gallons of total petroleum was consumed in California. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and greenhouse gas (GHG) emissions, and reduce vehicle miles traveled.

**a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

**Less-than-Significant Impact.** Construction of the proposed project would result in energy use primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, worker vehicles, and helicopters. Fuel consumption from construction equipment and vehicles was estimated by converting the total carbon dioxide (CO<sub>2</sub>) emissions from each construction phase to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. CO<sub>2</sub> emissions were estimated with the California Emissions Estimator Model (CalEEMod) Version 2022 based on the annual average usage assumptions developed by LADWP, as described in Section 3.3, Air Quality, above. All off-road equipment and hauling and vendor trucks are assumed to be diesel, and worker vehicles are assumed to be gasoline. The conversion factor for gasoline is 8.78 kilograms per metric ton of CO<sub>2</sub> per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton of CO<sub>2</sub> per gallon (The Climate Registry 2023). For helicopters, the jet fuel usage per hour was based on the Guidance on the Determination of Helicopter Emissions (FOCA 2017), assuming an Agusta A139 helicopter would be representative for the proposed project per input from LADWP.

The estimated diesel fuel usage from construction equipment, vendor and haul trucks, as well as estimated gasoline fuel usage from worker vehicles and jet fuel from helicopters is shown in Table 3.6-1.

**Table 3.6-1. Construction Petroleum Demand - Unmitigated**

| Phase                  | Off-Road Equipment (diesel) | Vendor Trucks (diesel) | Haul Trucks (diesel) | Worker Vehicles (gasoline) | Helicopters (jet fuel) |
|------------------------|-----------------------------|------------------------|----------------------|----------------------------|------------------------|
|                        | Gallons                     |                        |                      |                            |                        |
| Construction Total     | 65,254                      | 3,706                  | 11,655               | 13,051                     | 7,561                  |
| <b>Total Petroleum</b> |                             |                        |                      |                            | <b>101,908</b>         |

Source: Appendix B.

In summary, construction of the proposed project is conservatively anticipated to consume 101,908 gallons of petroleum over a period of approximately 2.5 years. For comparison, approximately 39 billion gallons of petroleum will likely be consumed in California over the course of the proposed project’s construction phase, based on the California daily petroleum consumption estimate of approximately 60.3 million gallons per day (EIA 2023). Notably, the proposed project would be subject to the California Air Resources Board (CARB) In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. Proposed project construction would represent a “single-event” petroleum demand and would not require on-going or permanent commitment of petroleum resources for this purpose. For operational energy use, proposed maintenance activities to service the upgraded transmission lines would be similar in nature and scale to the maintenance activities that are currently conducted for the existing lines. Therefore, maintenance activities and energy demand would be similar to existing baseline conditions.

Overall, the proposed project would not involve characteristics that require equipment that would be less energy-efficient than at comparable construction sites in the region or state. In addition, long-term maintenance of the lines would be similar to existing conditions and is not anticipated to require additional energy demand. Therefore, impacts would be less than significant.

**b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

No Impact. The proposed project would follow applicable energy standards and regulations during the construction phases. In addition, the proposed project would be built and operated in accordance with all existing, applicable regulations at the time of construction. While energy consumption would be required during construction, operation of the proposed project would ultimately assist in the implementation of state and local plans for renewable energy. As such, there would be no impact related to conflicts with plans for renewable energy and energy efficiency, and in fact, proposed project implementation would result in beneficial impacts.

### 3.7 Geology and Soils

| Would the project:                                                                                                             | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: |                                |                                                    |                                     |                          |
| i) Rupture of a known earthquake fault, as delineated on the most                                                              | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| Would the project:                                                                                                                                                                                                                 | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.               |                                |                                                    |                                     |                                     |
| ii) Strong seismic ground shaking?                                                                                                                                                                                                 | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iii) Seismic-related ground failure, including liquefaction?                                                                                                                                                                       | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iv) Landslides?                                                                                                                                                                                                                    | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Result in substantial soil erosion or the loss of topsoil?                                                                                                                                                                      | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?                                                                | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?                                               | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?                                                                                                                            | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/>            |

a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less-than-Significant Impact. Several of the proposed work areas are located near an Alquist-Priolo Earthquake Fault Zone as shown on the most recent Alquist-Priolo Earthquake Fault Zone Maps (California Geological Survey 2014). However, one tower, Tower 76-5, is located directly within an Alquist-Priolo Earthquake Fault Zone and is situated approximately 25 feet north of mapped secondary fault traces associated with the San Fernando Fault. Faulting in this area

consists of east-trending, north-dipping ruptures with surficial displacements occurring during the 1971 San Fernando Earthquake. The tower raise at Tower 76-5 is feasible from a geotechnical standpoint provided the fault zone and ground motion are considered during design and construction in this location.

The proposed project would not involve the construction of any habitable structures, nor would the proposed project increase the population in the project area. Construction activities would be temporary, lasting for several days at a time with construction personnel working sequentially along the transmission line corridor. Furthermore, the footings and raised towers would be designed and installed pursuant to existing federal, state, and County engineering and design standards related to seismic criteria.

Operational activities along the transmission lines would not change under the proposed project. Due to the infrequency of human presence in the proposed work areas and due to the minor and temporary nature of the construction activities, the proposed project would not substantially expose people or structures to adverse impacts related to fault rupture. For these reasons, the proposed project would not increase the risk of loss, injury, or death involving fault rupture within the project area, and impacts would be less than significant.

**ii) *Strong seismic ground shaking?***

**Less-than-Significant Impact.** The proposed project is located within the seismically active Southern California region and, like all locations within the region, is subject to strong seismic ground shaking. While construction workers would have the potential to be exposed to seismic ground shaking during the construction processes, the risk of loss, injury, or death would not be adverse relative to other areas in Southern California. The proposed project would not involve construction of any habitable structures, nor would it change the use of any existing structures resulting in an increase of occupants who may be exposed to fault rupture. For the tower raising activities, the raised towers would be designed and installed pursuant to existing federal, state, and County engineering and design standards related to seismic criteria, which would reduce potential damage to the raised transmission towers from ground movement. For these reasons, the proposed project would not increase the risk of loss, injury, or death involving seismic activity within the project area, and impacts would be less than significant.

**iii) *Seismic-related ground failure, including liquefaction?***

**Less-than-Significant Impact.** Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an earthquake. Earthquake waves cause water pressure to increase in the sediment and the sand grains to lose contact with each other, leading the sediment to lose strength and behave like a liquid. The proposed project consists of 17 work areas, nine where moderate amounts of grading would occur. The average depth of excavation would be approximately 2.2 feet (most excavation depths would be 1 to 3 feet deep and one location would have a depth of 5 feet). The grading activities would not expose people or structures to risk of liquefaction. No habitable structures are proposed, grading work is temporary and limited to several days, and the project would not increase the population in the area.

The proposed project also includes tower raises which would be designed and installed pursuant to existing federal, state, and County engineering and design standards related to seismic criteria, which would reduce potential damage to the raised transmission towers from ground movement, including movement from liquefaction. Geotechnical assessments were conducted for tower raise locations and none of the tower raise locations were located in an area of known geologic hazards including liquefaction, with the exception of Tower 76-5. Tower 76-5 is located within an area identified as having potential for liquefaction and within the limits of an Alquist-Priolo Earthquake Fault Zone. The tower raise at Tower 76-5 is feasible from a geotechnical standpoint provided the fault zone and potential liquefaction are considered during design and construction in this location.

For these reasons, the proposed grading activities and tower raising activities would not substantially increase the susceptibility of people or structures to risk of loss, injury, or death related to liquefaction, and impacts would be less than significant.

**iv) Landslides?**

**Less-than-Significant Impact.** Landslides are characterized as deep-seated ground failures, in which a large section of a slope detaches and slides downhill. Although some of the work sites may be located adjacent to slopes that could become unstable during an earthquake, the amount of grading per work site would be minimal and the risk to construction workers from landslides would be negligible. Given the relatively small scale of these planned excavations, it is unlikely that landslide movements would be generated by excavation associated with the proposed project. Geotechnical assessments for the tower raise locations were conducted and none of the tower raise locations were located in an area of known geologic hazards including landslides. Furthermore, the proposed project would not include construction of any habitable structures, nor would it increase the population in the project area. As such, the proposed project would not result in changes to structures or population levels susceptible to risk from landslide. For these reasons, impacts would be less than significant.

**b) *Would the project result in substantial soil erosion or the loss of topsoil?***

**Less-than-Significant Impact.** The grading activities would have the potential to contribute to erosion or loss of topsoil at the work sites. However, there are a variety of state and federal regulations that prevent erosion and loss of topsoil during construction that would be implemented for the proposed project. This would include preparation of and compliance with a SWPPP, which would include erosion control measures. Furthermore, LADWP's construction contractor would be required to salvage and preserve topsoil during the grading activities and then replace the topsoil once grading is completed. This requirement would minimize the amount of topsoil loss that would occur. During operation, no changes to maintenance or operational activities would occur relative to existing conditions; as such, once construction is complete, no change in soil erosion or loss of topsoil attributable to the proposed project would occur. Upon implementing the requirement to salvage topsoil during construction and upon compliance and with state and federal regulations involving stormwater pollution, impacts related to soil erosion and topsoil loss would be less than significant.

- c) ***Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

Less-than-Significant Impact. The proposed project involves movement of earth materials with the potential to trigger geological instability. The project would also involve a construction crew moving sequentially along the transmission line corridor. The construction crew would have the potential to be exposed to geologic instability during the construction process. After construction has been completed, operational and maintenance activities associated with the transmission lines would be the same as those that currently exist. As such, potential impacts would be limited to the construction period.

Refer to Section 3.6(a)(ii) and Section 3.6(a)(iv) for a discussion of impacts related to landslides and liquefaction. Lateral spreading is a type of liquefaction-induced ground failure occurring on mildly sloping ground. Lateral spreading primarily involves side-to-side movement of earth materials due to ground shaking and is evidenced by near-vertical cracks to predominantly horizontal movement of the soil mass involved. As discussed in Section 3.6(a)(iv), most of the work areas are not located in areas that are susceptible to liquefaction, with the exception of Tower 76-5. As such, lateral spreading would be unlikely to occur in the proposed work areas. Subsidence is the lowering of surface elevation due to changes occurring underground, such as the extraction of large amounts of groundwater, oil, or gas. When groundwater is extracted from aquifers at a rate that exceeds the rate of replenishment, overdraft occurs, which can lead to subsidence. The proposed project would not involve removal of groundwater, oil, or gas. As such, the proposed project would not result in on- or off-site subsidence. Collapsible soils consist of loose, dry materials that collapse and compact under the addition of water or excessive loading. Therefore, the work areas that would be most susceptible would be the tower raising sites. Collapsible soils are prevalent throughout the southwestern United States, specifically in areas of young alluvial fans. None of the tower raising locations are located within areas of young alluvial fans. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. While collapse has the potential to occur within or near the project area, the proposed project would not be expected to exacerbate or trigger collapse, as it would involve minor grading activities and the raising of existing transmission towers or grading underneath transmission lines.

In the event that geologic instability were to occur in the project area, the proposed project would not significantly increase the number of people who could be affected, nor would it involve the construction of any habitable structures with the potential to be affected by geologic instability. The raised towers would be designed and installed pursuant to existing federal, state, and County engineering and design standards related to seismic criteria, which would minimize the potential for the raised transmission towers to be damaged by geologic instability. Because operational activities would remain the same as those that currently occur in the project area, the proposed project would not expose additional people or structures to hazards related to geologic instability. For these reasons, impacts would be less than significant.

- d) ***Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

Less-than-Significant Impact. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. The proposed project would involve minor grading activities and

raising of existing transmission towers. In the event that soil expansion were to occur in the project area, it would not create substantial risks to life or property. The proposed project would not involve construction of habitable structures, and the presence of on-site workers would be temporary. The raised towers for the tower raising sites would be designed and installed pursuant to existing federal, state, and County engineering and design standards related to seismic criteria, which would reduce potential damage to the raised transmission towers from ground movement, including movement from expansive soils. Therefore, the proposed project would not create a substantial risk to life or property resulting from expansive soils, and the impact would be less than significant.

**e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

**No Impact.** The proposed project involves minor grading activities along existing transmission lines and raising existing transmission towers. No septic tanks or alternative wastewater disposal systems are proposed. Therefore, no impact associated with the use of such systems would occur.

**f) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

**Less-than-Significant Impact with Mitigation Incorporated.** Paleontological resources are the remains or traces of plants and animals that are preserved in Earth’s crust, and per the Society of Vertebrate Paleontology (SVP 2010) guidelines, are older than written history or older than approximately 5,500 years. They are limited, nonrenewable resources of scientific and educational value, which are afforded protection under state laws and regulations.

According to surficial mapping by Dibblee and Ehrenspeck (1991, 1996, 2001) and Olson and Hernandez (2013) and the geological time scale of Cohen et al. (2023) the portions of the project area requiring ground clearance, are underlain by the following geologic units with their corresponding paleontological sensitivities.

The late to middle Pleistocene (11,700 to 774,000 years ago) older alluvium (map unit Qoa) is composed of light-brown to dark reddish-brown, unconsolidated to moderately consolidated, fluvial, fine to coarse grained sand and silt with pebbles (Olson and Hernandez 2013). This unit underlies the 33-2 to 33-3 and 35-2 to 35-3 portions of the project. This unit has high paleontological sensitivity.

The late to middle Pleistocene (11,700 to 774,000 years ago) alluvial fan and high terrace deposits (map unit Qog) are composed of gravel and sand (Dibblee and Ehrenspeck 1996). This unit underlies the 65-4 to 66-1 portion of the project and has high paleontological sensitivity.

The middle Pleistocene to late Pliocene (774,000 years to 3.6 million years ago [mya]) Saugus Formation (map unit QTs) is a terrestrial-fluvial unit composed of light gray to light reddish-brown pebble-cobble conglomerate, sandstone, and siltstone (Dibblee and Ehrenspeck 1991). This unit underlies the 70-4 to 71-1 and 77-1 portions of the project at the surface, and the 65-4 to 66-1 portion of the project at depth. The Saugus Formation has high paleontological sensitivity.

The Miocene (23.3 to 5.33 mya) Punchbowl Formation (map unit Tps) is characterized by light pinkish-brown to tan sandstone with minor interbedded layers of clay shale and pebble conglomerate (Dibblee and

Ehrenspeck 2001). This unit is mapped near 35-2 to 35-3 and likely underlies this portion of the project at depth. The Punchbowl Formation has high paleontological sensitivity.

The Oligocene (33.9 to 23.03 million years ago) basal sandstone and conglomerate unit of the Vasquez Formation (map unit Tvs) consists of maroon-red sandstone and interbedded pebble-cobble conglomerate (Dibblee and Ehrenspeck 2001). This unit underlies the 38-4 to 39-1 portion of the project. Although no fossils have been officially reported from this formation the basal Vasquez Formation retains all the parameters for producing fossils. This unit has moderate paleontological sensitivity.

The remaining portions of the Project that will have ground clearing activities are underlain by units composed of volcanic and/or metamorphic rocks (Dibblee and Ehrenspeck 1996, 2001; Hernandez 2009). These units have no paleontological sensitivity.

Dudek submitted a paleontological records search request to the Natural History Museum of Los Angeles County (NHMLA/LACM) of the proposed project areas requiring ground clearance and the surrounding vicinity on September 25, 2024, and the results were received on October 2, 2024. The NHMLA reported no previous fossil localities from within the project, but does have localities from the same or similar sediments as those that underlie the project. The closest localities to the project are as follows: LACM VP 7988, 7989 is located approximately 0.77 miles southwest of the 65-4 to 66-1 portion, and yielded rodent and bird fossils from the Saugus Formation, all other localities are well over 3 miles or more away from the Project (Appendix E, Confidential NHMLA Records Search Results).

An unofficial records search conducted, for the ground clearance portions of the project, through the University of California's (UCMP) online database (2024) and the Paleobiology Database (PB) (2024) returned the following results: UCMP locality 3147 lies approximately 0.48 miles west/northwest of the 33-2 to 33-3 portion, and 1.5 miles east/northeast of the 35-2 to 35-3 portion of the project. This locality has produced the fossil remains of an unidentified perissodactyl. The San Bernardino County Museum (SBCM) localities 1.103.53, 125-136 are located approximately 0.82 miles north/northwest of the 33-2 to 33-3 portion, and 1.5 miles north of 35-2 to 35-3. This locality has yielded the following fossil taxa: weasel, canid, shrew, rodents, camels, large extinct ruminant, peccary, horses, and tapir. The Soleadad Pass locality, which lies 0.95 miles west/northwest of the 38-4 to 39-1 portion of the project, has yielded fossil fish. CIT (California Institute of Technology) 99 and 101 localities are location approximately 2 miles north/northeast and north/northwest of portion 65-4 to 66-1. These localities have produced fossil horses and camel. There are numerous localities at approximately 1.4 miles north and southeast of location 70-4 to 71-1. These localities (LACMIP 17851, 17850, 17849, 17848, 17846, 17847; UCLA L-2055, L-2056, 5758, 5775, 5788; and SDSNH Loc. 210, 201 to name a few) have yielded fossil bryozoans, bivalves, gastropods, echinoids, scaphopods, crabs, shark, and unidentified vertebrate material.

No paleontological resources were identified within the project sites as a result of the institutional records search, unofficial records search, or desktop geological and paleontological review. In addition, the project sites are not anticipated to be underlain by unique geologic features. Due to the high paleontological sensitivity, areas of the project sites requiring ground clearance underlain by Pleistocene deposits, the Saugus Formation, and Punchbowl Formation would be required to have a full-time paleontological monitor, meeting the Society of Vertebrate Paleontology (SVP) 2010 standards, while ground-disturbing activities are taking place. Portions of the project, requiring ground clearance, underlain by the basal Vasquez Formation would be required to have part-time, spot-check, paleontological monitoring conducted during ground-disturbing activities. With the incorporation and implementation of a paleontological

resources monitoring plan along with paleontological monitoring, impacts would be reduced to less than significant.

MM-GEO-1 Paleontological Monitoring Program. Prior to commencement of any grading activity for the project, LADWP shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (2010) guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program for the proposed project. Following the guidelines of the Society of Vertebrate Paleontology (2010), the Paleontological Resources Impact Mitigation Program shall outline requirements for preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the project area based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the preconstruction meeting and be on site (or a qualified paleontological monitor per the SVP [2010] guidelines) during all rough grading and other significant ground-disturbing activities in previously undisturbed sedimentary deposits assigned high paleontological resource sensitivity. These deposits may be encountered at any depth below any fill materials (i.e., road base). In addition, the qualified paleontologist or paleontological monitor shall monitor the Vasquez Formation on a part-time basis. The specific monitoring locations will be detailed in the Paleontological Resources Impact Mitigation Program. In the event that paleontological resources (e.g., fossils) are unearthed during ground-disturbing activities, the qualified paleontologist will temporarily halt and/or divert the activity to allow recovery of paleontological resources. Once documentation and collection of the find is completed, the monitor will allow work to recommence in the area of the find. Per the Society of Vertebrate Paleontology (2010) guidelines, if 50% of excavations in a single geological unit has occurred with no fossil recovery, reduction or termination of paleontological monitoring can be implemented at the qualified paleontologist’s discretion.

### 3.8 Greenhouse Gas Emissions

| Would the project:                                                                                                               | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

#### Existing Setting

Climate change refers to any significant change in measures of climate (e.g., temperature, precipitation, or wind patterns) lasting for an extended period of time (i.e., decades or longer). The Earth’s temperature depends on the

balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5). The three GHGs evaluated herein are CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O because these gases would be emitted as a result of the proposed project.

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO<sub>2</sub>; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO<sub>2</sub> equivalent (CO<sub>2</sub>e). Consistent with CalEEMod Version 2022, the GHG emissions analysis presented herein assumes the GWP for CH<sub>4</sub> is 25 (i.e., emissions of 1 MT of CH<sub>4</sub> are equivalent to emissions of 25 MT of CO<sub>2</sub>), and the GWP for N<sub>2</sub>O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

As discussed in Section 3.3, the project is located largely within the AVAQMD's jurisdictional boundaries with a small portion of the western project area within the SCAQMD's jurisdictional boundaries. The AVAQMD has prepared criteria and thresholds for determining significance of GHG emissions under CEQA. Per the CEQA and Federal Conformity Guidelines, any project is significant if it triggers or exceeds the most appropriate evaluation criteria, which states that a project would result in significant emissions if it "Generates total emissions (direct and indirect) in excess of the thresholds" as follows (AVAQMD 2016):

- Daily threshold: 548,000 pounds CO<sub>2</sub>e per day
  - The AVAQMD has a daily threshold of 548,000 pounds CO<sub>2</sub>e per day for multi-phase projects with phases shorter than 1 year.
- Annual threshold: 100,000 tons CO<sub>2</sub>e per year, which equates to 90,718 MT CO<sub>2</sub>e per year.
  - Given the long-term nature of the proposed project, the annual threshold is the more applicable threshold per the AVAQMD's guidance.

In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO<sub>2</sub>e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD 2008). The 10,000 MT

CO<sub>2</sub>e per-year threshold, which was derived from GHG reduction targets established in Executive Order S-3-05, was based on the conclusion that the threshold was consistent with achieving an emissions capture rate of 90% of all new or modified stationary source projects.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land-use development projects. The most recent proposal issued by SCAQMD, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1.** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2.** Consider whether or not the project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3.** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO<sub>2</sub>e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO<sub>2</sub>e per year), commercial projects (1,400 MT CO<sub>2</sub>e per year), and mixed-use projects (3,000 MT CO<sub>2</sub>e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO<sub>2</sub>e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4.** Consider whether the Project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO<sub>2</sub>e per service population for project level analyses and 6.6 MT CO<sub>2</sub>e per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5.** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

To provide a conservative analysis of GHG emissions as a result of the project, the SCAQMD's 3,000 MT CO<sub>2</sub>e per year threshold, which is the most stringent of the available thresholds was applied to the entirety of the proposed project.

- a) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

### **Construction Greenhouse Gas Emissions**

**Less-than-Significant Impact.** GHG emissions based on the construction scenario described in Section 3.3. On-site sources of GHG emissions include off-road equipment and off-site sources include on-road

vehicles (off-road equipment, helicopters, haul trucks, vendor trucks, and worker vehicles). Table 3.8-1, Estimated Annual Construction Greenhouse Gas Emissions, presents construction emissions for the proposed project from on-site and off-site emission sources.

**Table 3.8-1. Estimated Annual Construction Greenhouse Gas Emissions**

| Estimated Annual GHG Emissions           | MT CO <sub>2</sub> | MT CH <sub>4</sub> | MT N <sub>2</sub> O | MT CO <sub>2</sub> e |
|------------------------------------------|--------------------|--------------------|---------------------|----------------------|
| 2025                                     | 397 <sup>1</sup>   | 0.01               | 0.12                | 400.84               |
| 2026                                     | 519.80             | 0.02               | 0.02                | 526.17               |
| 2027                                     | 102.24             | <0.01              | <0.01               | 102.59               |
| <b>Total</b>                             |                    |                    |                     | <b>1,029.60</b>      |
| <b>Amortized Emissions over 30 Years</b> |                    |                    |                     | <b>34.32</b>         |

**Notes:** See Appendix B for detailed results.

MT CO<sub>2</sub> = metric tons carbon dioxide; MT CH<sub>4</sub> = metric tons methane; MT N<sub>2</sub>O = metric tons nitrous oxide; MT CO<sub>2</sub>e = metric tons carbon dioxide equivalent

<sup>1</sup> Includes helicopter GHG emissions.

As shown in Table 3.8-1, the estimated total GHG emissions during construction of the proposed project would be approximately 1,030 MT CO<sub>2</sub>e. Total emissions amortized over 30 years—the estimated lifespan for a public infrastructure project—would be approximately 34 MT CO<sub>2</sub>e/year. Therefore, the total amortized GHG emissions from construction would not exceed the GHG significance threshold of 3,000 MT CO<sub>2</sub>e/year. In addition, GHG emissions generated during construction of the proposed project would be short-term in nature, lasting only for the duration of the construction period, and they would not represent a long-term source of GHG emissions.

### Operational Greenhouse Gas Emissions

Regarding long-term operations, the proposed project would not change the routine inspection and maintenance of the existing transmission lines or result in a net increase in GHG emissions. Therefore, impacts related to GHG emissions would be less than significant.

**b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

#### Potential to Conflict with the Regional Transportation Plan/Sustainable Communities Strategy

**Less-than-Significant Impact.** The Southern California Association of Governments developed Connect SoCal, the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which complies with CARB’s updated emissions reduction targets and meets the requirements of SB 375 by achieving per-capita GHG emissions reductions relative to 2005 of 8% by 2020 and 19% by 2035 (SCAG 2020). In addition to demonstrating the region’s ability to attain the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

The following strategies are intended to be supportive of implementing the 2020–2045 RTP/SCS and reducing GHGs: focus growth near destinations and mobility options; promote diverse housing choices; leverage technology innovations; support implementation of sustainability policies; and promote a green region (SCAG 2020). The majority of these strategies would not apply to the project, which pertain to land use development and transportation sectors. The project’s compliance with the remaining applicable strategy is presented below.

- **Promote a Green Region.** This strategy involves promoting a green region through efforts such as supporting local policies for renewable energy production and promoting more resource efficient development (e.g., reducing energy consumption) to reduce GHG emissions. The project is supportive of this strategy since the project will accommodate incoming renewable energy resources and allow the LADWP to achieve the state’s Renewable Portfolio Standard (RPS) requirements.

Based on the preceding, the project would not conflict with the Southern California Association of Governments’ 2020–2045 RTP/SCS.

### **Project Potential to Conflict with State Reduction Targets and the California Air Resources Board’s Scoping Plan**

The California State Legislature passed the Global Warming Solutions Act of 2006 (AB 32) to provide initial direction to limit California’s GHG emissions to 1990 levels by 2020 and initiate the state’s long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. For the proposed project, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter.

As defined by AB 32, CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state’s GHG emission targets. The Scoping Plan is required to be updated every 5 years and requires CARB and other state agencies to adopt regulations and initiatives that will reduce GHG emissions statewide. The first Scoping Plan was adopted in 2008, and was updated in 2014, 2017, and most recently in 2022. While the Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations,<sup>3</sup> it is the official framework for the measures and regulations that will be implemented to reduce California’s GHG emissions in alignment with the adopted targets. Therefore, a project would be found to not conflict with the statutes if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

CARB’s 2017 Scoping Plan update was the first to address the state’s strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017), and the most recent CARB 2022 Scoping Plan update outlines the state’s plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress is making toward the 2030 SB 32 target (CARB 2022). As such, given that

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<sup>3</sup> The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that “[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan” (CNRA 2009).

SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates that outline the strategy to achieve those targets are the most applicable to the project.

The 2017 Scoping Plan included measures to promote renewable energy and energy efficiency, increase stringency of the Low-Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and increase stringency of SB 375 targets. The 2022 Scoping Plan builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022).

### Summary

As discussed above, the proposed project would not exceed the SCAQMD’s 3,000 MT CO<sub>2</sub>e per year threshold or the AVAQMD’s 90,718 MT CO<sub>2</sub>e per year threshold and would not conflict with the Southern California Association of Governments’ 2024 RPT/SCS, the 2017 and 2022 Scoping Plans and would not conflict with the state’s trajectory toward future GHG reductions. Furthermore, the proposed project would aid LADWP in achieving the state’s RPS requirements, which is a key component of the state’s 2017 and 2022 Scoping Plan and would support the state’s ability to achieve the 2030 and 2045 GHG reduction and carbon neutrality goals. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Thus, impacts related to the potential to conflict with an applicable GHG reduction plan would be less than significant.

## 3.9 Hazards and Hazardous Materials

| Would the project:                                                                                                                                                                              | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?                                                         | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                 | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a                             | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

| Would the project:                                                                                                                                                                                                                                                                  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| significant hazard to the public or the environment?                                                                                                                                                                                                                                |                                |                                                    |                                     |                                     |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                                           | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?                                                                                                                                             | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

**Less-than-Significant Impact.** Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction activities would be temporary in nature and would involve the limited transportation, storage, usage, and disposal of hazardous materials. Such hazardous materials could include on-site fueling/servicing of construction equipment, and the transport of fuels, lubricating fluids, and solvents. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control, the U.S. EPA, the Occupational Safety & Health Administration, and the Los Angeles County Fire Department. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with applicable federal, state, and local regulations governing such activities. Therefore, the short-term construction impact would be less than significant.

Once construction is complete, the operational activities along the transmission lines would not change upon implementation of the proposed project. As such, no operational impact related to the routine use or transport of hazardous materials would occur as a result of the proposed project.

**b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

**Less-than-Significant Impact.** The proposed project construction would not create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As discussed in Section 3.9(a), construction activities may involve limited transport, storage, use, or disposal of some hazardous materials, such as on-

site fueling/servicing of construction equipment, and the transport of fuels, lubricating fluids, and solvents. The majority of the project area straddles the Transverse Ranges through the Santa Clara River Valley, Soledad Canyon, and Sierra Pelona Mountains. None of the work site locations are located on agricultural land which could result in exposure of pesticides during earthmoving activities. As such, the potential for encountering pesticides of high concentration is low. Furthermore, these types of materials that would be used or that would have the potential to be encountered (i.e., pesticides) are not acutely hazardous.

The heavy equipment used for grading would be operated using oil, fuel, lubricating grease, coolants and hydraulic fluids. In the event that hazardous or regulated materials were spilled, direct impacts could occur related to the release of hazardous materials into the environment, resulting in the exposure of workers to the materials. Such impacts would generally be temporary, due to the short-term nature of construction. Any hazardous substance spills would be cleaned immediately, and any resulting waste would be transferred off site in accordance with all applicable federal, state, and local regulations. Contractors would maintain spill kits on site for use in case of a spill. As such, in the unlikely event that hazardous materials are spilled during construction, impacts would be temporary, minor, and localized, because such spills would be required to be properly controlled and safely removed in accordance with existing regulations.

Compliance with existing federal, state, and local regulations would ensure that construction impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials would be less than significant.

Once construction is complete, the operational activities along the transmission lines would not change upon implementation of the proposed project. As such, no operational impact related to the release of hazardous materials would occur as a result of the proposed project.

**c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

**No Impact.** There are no schools within 0.25 miles of the proposed work areas. The majority of the proposed work areas are located in undeveloped areas, so it is unlikely that a school would be proposed near the project area in the future. The proposed project would not alter any land uses or introduce any new sources of hazardous materials. Furthermore, the activities associated with the proposed ground-to-conductor activities would involve hazardous materials typical of construction processes and therefore would not introduce acutely hazardous materials into the project area. As such, no impact would occur as a result of the proposed project.

**d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

**Less-than-Significant Impact.** Several properties within the project vicinity (though outside of the project site) are listed on hazardous waste sites lists compiled pursuant to Government Code Section 65962.5, such as the Regional Water Quality Control Board (RWQCB) GeoTracker site and the Department of Toxic Substances Control's EnviroStor site. Specifically, a facility identified as Safety-Kleen Systems, Inc. (EPA ID CAT000613992) is located 1.72 miles east of Tower 77-1; however, this facility is designated as historical and non-operating. Also, a facility identified as PPG Industries-Works (EPA ID CAD030835086)

is located 5.4 miles west of Tower Span 65-4 to 66-1; however, this facility is also designated as historical and non-operating.

Construction activities would not require deep excavations. This would further decrease the likelihood for hazardous materials sites, such as underground storage tanks, to be encountered during ground-to-conductor clearance activities. Furthermore, construction activities would occur primarily in areas that are naturally vegetated, with prior on-site activities limited to those required to construct and maintain the transmission infrastructure. For these reasons, it is not anticipated that any hazardous materials sites would be encountered or disturbed during the proposed ground-to-conductor clearance activities, or tower raises. In the unlikely event that hazardous wastes are uncovered, workers would be required to adhere to existing state and federal requirements pertaining to safe handling and proper disposal of such wastes. As such, impacts would be less than significant.

- e) ***For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?***

**Less-than-Significant Impact.** The closest airports to the project area are the Agua Dolce Airport, which is a public use airport located 1.31 miles south of Tower 54-2, and the Hollywood Burbank Airport, which is also a public use airport located 9.64 miles southeast of Tower 77-1. Both of these towers are proposed to be raised by approximately 10 feet in height. The slightly taller structures would not be anticipated to exceed the 200 feet AGL height standard established by the Federal Aviation Administration (FAA 2007) to determine whether marking and/or lighting is required on temporary or permanent structures. As such, an airport safety hazard related to the slightly taller structures would not be anticipated.

The work crew(s) would be present on each work site for a limited period of time. While the number of workers near the two closest airports would temporarily increase during the proposed construction activities, the number of workers and the amount of time that they would be present on each work site would be limited. Furthermore, the proposed project would not permanently increase the number of people who reside or work near the two identified airports, nor would the proposed project introduce new habitable structures or noise sensitive uses to the project area. For these reasons, the proposed project would not substantially alter airport safety hazards in the project area and impacts would be less than significant.

- f) ***Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

**No Impact.** The proposed project would be located primarily in undeveloped areas within an existing utility corridor. While existing unpaved access roads would be used to complete the proposed project, these access roads are located within the existing utility corridor and are not identified as emergency evacuation routes. Temporary use of these access roads would not hinder emergency response or evacuation. As such, no impact would occur.

- g) ***Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

**Less-than-Significant Impact.** See Section 3.20, Wildfire. All of the work areas are within either High or Very High Fire Hazard Severity Zones, with the exception of the tower raises at LADWP's Van Norman

Complex (CAL FIRE 2025). No new infrastructure would be built as part of the project, but construction equipment at the work areas have the potential to ignite or start a fire. With respect to wildfire ignition sources, certain activities may require hot work. Welders and torches would be an open heat source that may result in metallic sparks coming into contact with vegetation. Furthermore, grinders and chainsaws used for vegetation removal/maintenance may result in vegetation ignition from overheating, sparks, or fuel leak. Although such activities would have a greater potential for wildfire ignition sources, the proposed project would adhere to the standards in the latest LADWP Wildfire Mitigation Plan, which is intended to mitigate risks caused by electrical lines and equipment (LADWP 2024). Therefore, the proposed project would not expose people or structures to risk involving wildland fire, and impacts would be less than significant.

### 3.10 Hydrology and Water Quality

| Would the project:                                                                                                                                                                                                     | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?                                                                             | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?                                  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| i) Result in a substantial erosion or siltation on- or off-site?                                                                                                                                                       | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?                                                                                            | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?                                | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) Impede or redirect flows?                                                                                                                                                                                          | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| Would the project:                                                                                                      | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|-------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?                     | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

**Less-than-Significant Impact.** The proposed project involves minor grading activities and tower raises at 17 work areas along the existing ADL-RIN L1 transmission lines (nine ground-to-conductor grading activities and eight tower raises). The proposed project also entails improvements to portions of existing access roads slated for site access uses, equipment staging and storage, and distribution of excavated soils. In the event that stormwater were to be generated during construction activities, sediment runoff or runoff containing pollutants from construction equipment present on site would have the potential to occur. As such, water quality standards and waste discharge requirements related to stormwater runoff would apply to construction of the proposed project.

Prior to the start of construction, LADWP would be required to obtain a General Storm Water Permit Associated with Construction Activity, issued by the State Water Resources Control Board. One of the conditions of the General Permit is the development and the implementation of a SWPPP by a QSD, which would identify structural and nonstructural BMPs to be implemented by the QSP during the construction phase. LADWP would also develop and implement an erosion control plan for the proposed project. These BMPs would minimize direct impacts to surface water quality and would also minimize the potential for indirect impacts to occur such as increases in sediment loads in surface waters. With implementation of BMPs as outlined in the SWPPP and erosion control plan, the proposed project would not violate any water quality standards or waste discharge requirements. Therefore, impacts on water quality from construction activities would be less than significant. Operational conditions and activities would not be altered by the proposed project such that water quality standards or waste discharge requirements would be violated. Impacts would therefore be less than significant.

**b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

**Less-than-Significant Impact.** The proposed project would correct nine insufficient ground-to-conductor clearances along an existing overhead transmission line and would raise transmission towers at eight locations. Water associated with the proposed project would consist of water used for dust control during construction activities. This water would be transported to the work sites in a water truck and would not increase water use in the project area to the extent that groundwater supplies would become substantially depleted.

Groundwater can potentially be encountered during construction activities when deep excavations are involved and/or when groundwater levels are high. However, the proposed grading activities would have an average depth of 2.2 feet (most excavation depths would be 1 to 3 feet deep and one location would have a depth of 5 feet). As such, it is not anticipated that groundwater would be encountered or affected during the proposed grading activities. Impacts would be less than significant.

**c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

***i) Result in a substantial erosion or siltation on- or off-site?***

*Less-than-Significant Impact.* As determined in the 2024 Psomas Jurisdictional Waters Assessment (Appendix F), small ephemeral drainage features are located in the vicinity of the Tower 57-2 and Tower 61-2 work areas; however, they are far enough away that construction activities can avoid any direct impacts to them. Regarding Tower Span 70-4 to 71-1, a portion of Placerita Canyon Creek is located south of this work area. An at-grade crossing passes through this creek to reach the work area from the south. The analysis contained in Appendix F determined that it would be possible for construction activities to avoid any direct impacts to this creek.

Storm events occurring during the construction phase would have the potential to carry disturbed sediments off site. Compliance with the stormwater runoff regulations described under Section 3.9(a) would ensure that impacts related to erosion and siltation during construction activities would remain less than significant. It is anticipated that drainage patterns would not be substantially altered during operation. Furthermore, no impervious surfaces would be added as part of the proposed activities. Impacts would be less than significant.

***ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?***

*Less-than-Significant Impact.* The proposed project would not alter the course of a stream or river. Furthermore, as described in Section 3.9(b), the proposed project would not increase the amount of impervious surfaces in the project area. Because the proposed project would not introduce new impervious surfaces, the rate or amount of surface runoff would not be substantially increased to the extent that flooding is caused on or off site.

As explained in Section 3.9(c), no drainages would be altered and all identified features can and will be avoided during construction; thus, flooding would not be impeded or substantially redirected. It is anticipated that drainage patterns would not be substantially altered during operation. Impacts would therefore be less than significant.

***iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

*Less-than-Significant Impact.* As described under Section 3.9(d), the proposed project would not increase the amount of runoff from the project area. As such, the proposed project would not affect the capacity of stormwater drainage systems. However, storm events occurring during the

construction phase would have the potential to carry disturbed sediments and spilled substances from construction activities, thereby creating a temporary source of polluted runoff. Compliance with the water quality regulations described under Section 3.9(a) would ensure that impacts related to polluted runoff during construction activities would remain less than significant. Operational conditions and activities would not be altered by the proposed project such that a new source of polluted runoff would be created. Impacts would therefore be less than significant.

**iv) *Impede or redirect flood flows?***

*Less-than-Significant Impact.* The proposed ground-to-conductor clearance activities and tower raises do not involve installation of new permanent or habitable structures, and no new impervious surfaces would be added that could redirect flood flows. The proposed ground-to-conductor clearance activities may result in minor alternations to the drainage patterns within the project area. This is because existing rills or gullies formed by water flow may be altered, and the shape and slope of the grading sites may be slightly altered as areas underneath the power lines are graded and excavated soils are spread along access roads. However, these minor alternations in drainage would not substantially alter the extent to which flooding occurs in the project area or vicinity, as flooding would not be impeded or substantially redirected. It is anticipated that once construction activities at each site are complete, any rills or gullies that were altered by the ground-to-conductor clearance activities would be naturally reestablished and that drainage patterns would not be substantially altered during operation. Impacts would therefore be less than significant.

**d) *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation ?***

*Less-than-Significant Impact.* Seiches are oscillations generated in enclosed bodies of water, usually as a result of earthquake-related ground shaking. A seiche wave has the potential to overflow the sides of a containing basin to inundate adjacent or downstream areas. There are no large, enclosed bodies of water directly upstream from the project area. As such, the project area would not be subject to inundation by seiche.

The closest body of water that has a dam would be Lake Palmdale, which is 2.3 miles northeast of Tower 43-2. The dam is located on the eastern side of the lake and if it were to fail, water would flow southeast generally towards Tower Span 35-2 to 35-3; however, this tower span is approximately 6 miles away from the dam and intervening topography would prevent flows from reaching this work area. Therefore, the potential for construction workers to be exposed to flooding due to a failure of a levee or dam is negligible. Furthermore, the risk would not be substantial relative to other areas throughout Southern California. Operational conditions and activities would not introduce additional people or structures to the project area; as such, the project would not expose additional people or structures to risk involving flooding during operation.

Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. The closest work area to the Pacific Ocean is located over 15 miles inland. As such, the project area would not be susceptible to inundation by tsunami.

Several of the work sites are located adjacent to slopes that would have the potential to be impacted by landslides or mudflows. While construction workers would have the potential to be exposed to mudflow

during the construction processes, the risk of loss, injury, or death would not be adverse relative to many other areas across Southern California. Furthermore, the proposed project would not include construction of any habitable structures, nor would it increase the population in the project area. As such, the proposed project would not result in changes to structures or population levels susceptible to risk from mudflow. For these reasons, impacts would be less than significant.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Less-than-Significant Impact.** The proposed project involves grading activities at nine sites and tower raising activities at eight sites. In the event that stormwater flows occur during construction activities, sediment runoff or runoff containing pollutants from construction equipment present on site would have the potential to occur. As such, wastewater treatment requirements related to stormwater runoff would apply to the proposed project. This would include preparation and implementation of a SWPPP and erosion control plan, which would be prepared for the proposed project and would specify appropriate BMPs to control runoff from the work sites. Additionally, any wastewater discharged by the proposed project must comply with National Pollutant Discharge Elimination System requirements. Construction activities would be required to comply with all applicable wastewater treatment requirements of the RWQCB. Operational conditions and activities would not be altered by the proposed project such that it would obstruct implementation of a water quality control plan.

In addition, the project would not directly involve groundwater use, no wells are proposed, and the project would not alter groundwater percolation relative to existing conditions.

For these reasons and upon compliance with the applicable permit requirements during construction, impacts would be less than significant.

### 3.11 Land Use and Planning

| Would the project:                                                                                                                                                                                | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| a) Physically divide an established community?                                                                                                                                                    | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**a) Would the project physically divide an established community?**

**No Impact.** The proposed project is scattered along the Adelanto-Rinaldi transmission line, extending between the San Fernando Valley of the City of Los Angeles and the southern extent of the Antelope Valley. The proposed project occurs within the northern half of Los Angeles County, and generally straddles the

Transverse Ranges through the Santa Clara River Valley, Soledad Canyon, and Sierra Pelona Mountains. The most southwestern work locations (Towers 76-5 and 77-1) are located within the San Fernando Valley in undulating hilly terrain around the basin of LADWP’s Van Norman Complex. The work locations within the Santa Clara River Valley (Tower Spans 70-4 to 71-1, 65-4 to 66-1, and Tower 61-2) are characterized by moderately steep slopes in hilly terrain. Work locations within Soledad Canyon and the Sierra Pelona Mountains (Tower 57-2, Tower Span 57-1 to 57-2, Tower 54-2, Tower Span 49-2 to 49-3, Tower 46-4, Tower 43-2, Tower Spans 41-3 to 41-4, 38-4 to 39-1, and 38-1 to 38-2) range in moderate to very steep slopes set in mountainous terrain. In the portion of the project that occurs along the southern extent of the Antelope Valley (Tower Spans 35-2 to 35-3, 33-2 to 33-3, and Tower 32-4), the terrain is generally gently sloping with a few scattered hills. Elevations within the proposed project footprint range from approximately 1,155 amsl at the Van Norman Complex to approximately 4,270 amsl in the Sierra Pelona portion of the transmission line.

Projects that typically have a potential to divide an establish community consist of airports, freeways, stadiums, and/or railroads. The proposed project consists of tower raises and underline grading where transmission line infrastructure currently exists. The project locations are scattered throughout isolated hilly terrain and are not located within an established community. Therefore, it would not have the potential to divide such a community. No impact would occur.

**b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

Less-than-Significant Impact. Numerous land use plans apply to the project area; however, the project would not involve an increase in residential development, would not result in population growth, and would not preclude the establishment of open space areas. The project merely includes improvements and retrofits to existing infrastructure. Therefore, the project would be consistent with the purposes of any underlying land use and zoning designations for the transmission alignment set forth in the applicable land use plans. After construction is complete, each tower site and work area would be restored to its original condition to the extent feasible, and operational activities of the transmission lines would return to normal. As such, a less-than-significant impact would occur.

### 3.12 Mineral Resources

| Would the project:                                                                                                                                                     | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of a value to the region and the residents of the state?                               | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

a) **Would the project result in the loss of availability of a known mineral resource that would be of a value to the region and the residents of the state?**

No Impact. The proposed project consists of 17 individual work sites located along an existing utility corridor. According to the Department of Conservation, none of the work areas are underlined by a designated mineral resource zone. The proposed project would involve shallow grading activities within an existing utility corridor and in the event that mineral resources are present, extraction of the resources in the future would not be precluded. There are also no known mineral extraction sites in operation at any of the proposed work areas. As such, no long-term direct impacts would occur to mineral resources.

Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) **Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

No Impact. See Section 3.11(a). No impacts to locally important mineral resources would occur.

### 3.13 Noise

| Would the project:                                                                                                                                                                                                                                                                                      | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?                                             | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Result in generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                                                                                 | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

- a) **Would the result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less-than-Significant Impact. Implementation of the proposed project would result in two primary types of potential noise impacts: short-term (i.e., temporary) noise during construction, and long-term noise during operation.

**Construction**

Construction noise and vibration are temporary phenomena, varying from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor. Implementation of the proposed project would result in short-term (i.e., temporary) noise during construction. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 3.13-1. The proposed grading activities, which would occur at nine work sites, would involve the following types of construction equipment: motor graders, bulldozers, excavators, compact skid-steer loaders, dump trucks, water trucks, wheel/track loaders, backhoe loaders, jackhammers, and various small utility vehicles. The proposed tower raising activities, which would occur at eight work sites, would involve the following types of construction equipment: cranes, manlifts, wheel/track loaders, backhoe loaders, all-terrain forklifts, water trucks, diesel air compressors, and small utility vehicles.

Usually, construction equipment operates in alternating cycles of full power and low power, which the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) User’s Guide (FHWA 2006) characterizes as “acoustical usage factor” (AUF) and thereby produces energy-average noise levels over time ( $L_{eq}$ ) that are less than the listed maximum noise level ( $L_{max}$ ). The average sound level of construction activities also depends on the amount of time that the equipment actually operates on site.

**Table 3.13-1. Typical Construction Equipment Maximum Noise Levels**

| FHWA RCNM Equipment Type   | Acoustical Usage Factor (%) | Typical Equipment $L_{max}$ (dBA at 50 Feet) | Typical Equipment $L_{eq}$ (dBA at 50 Feet) |
|----------------------------|-----------------------------|----------------------------------------------|---------------------------------------------|
| all other equipment > 5 HP | 50                          | 85                                           | 82                                          |
| backhoe                    | 40                          | 78                                           | 74                                          |
| compressor (air)           | 40                          | 78                                           | 74                                          |
| concrete mixer truck       | 40                          | 79                                           | 75                                          |
| crane                      | 16                          | 81                                           | 73                                          |
| dozer                      | 40                          | 82                                           | 78                                          |
| generator                  | 50                          | 72                                           | 69                                          |
| grader                     | 40                          | 85                                           | 81                                          |
| man lift                   | 20                          | 75                                           | 68                                          |
| paver                      | 50                          | 77                                           | 74                                          |
| roller                     | 20                          | 80                                           | 73                                          |
| scraper                    | 40                          | 84                                           | 80                                          |
| welder / torch             | 40                          | 73                                           | 69                                          |

Source: FHWA 2006.

Notes:  $L_{max}$  = maximum sound level; where  $L_{eq}$  = energy-equivalent sound level and can be calculated here with  $L_{eq} = L_{max} + 10 \cdot \text{LOG}(\text{AUF})$ ; dBA = A-weighted decibels.

The County of Los Angeles Municipal Code (Section 12.08.390) establishes standards concerning acceptable noise levels for both noise-sensitive land uses and for noise-generating land uses. It also defines noise-sensitive land uses and limits the amount of noise that can be received at a noise-sensitive land use. The standards established in the Municipal Code for emanations from a stationary noise source as it affects adjacent properties are listed in Table 3.13-2.

**Table 3.13-2. County of Los Angeles Exterior Noise Standards**

| Noise Zone | Designated Noise Zone Land Use (Receptor Property) | Time Interval       | Exterior Noise level (dB) |
|------------|----------------------------------------------------|---------------------|---------------------------|
| I          | Noise-Sensitive Area                               | Anytime             | 45                        |
| II         | Residential Properties                             | 10:00 PM to 7:00 AM | 45                        |
|            |                                                    | 7:00 AM to 10:00 PM | 50                        |
| III        | Commercial Properties                              | 10:00 PM to 7:00 AM | 55                        |
|            |                                                    | 7:00 AM to 10:00 PM | 60                        |
| IV         | Industrial Properties                              | Anytime             | 70                        |

As shown in Table 3.13-1, some of the construction equipment involved with the proposed project would have the potential to exceed the noise standards shown in Table 3.13-2. However, the proposed project is located within an existing utility corridor that is surrounded primarily by undeveloped land. Because noise attenuates with distance and because the project area primarily consists of undeveloped land, it is unlikely that the project would result in exceedances of the standards listed in the Municipal Code, as most work sites are not located in the vicinity of residential, professional, commercial, or industrial uses. The majority of the project area is zoned for Open Space. Exceptions are towers 76-5 and 77-1, which are located on land zoned as Public Facilities at the LADWP’s Van Norman Complex. The closest residential receptors are located near Tower Span 65-4 to 66-1 approximately 0.12 miles (633 feet) to the east.

While ambient noise levels would be temporarily raised within the project area as the construction crew moves down the utility corridor, noise would be produced at each work site for a limited amount of time and would not be produced adjacent to sensitive receptors. For these reasons, impacts involving substantial temporary increases or periodic increases in ambient noise levels would be less than significant.

Where the terrain is steep or access is limited, helicopter use may be required for replacement of existing tower structures, tower construction, and conductor pulling and tensioning. Helicopter operations would be limited to daytime working hours and would be short-term in nature. Furthermore, they would primarily be used in remote locations, far from residential or other noise-sensitive uses, would be used rather infrequently (a few weeks per year), and for relatively short durations (a few hours per day during daytime working hours). For these reasons, noise impacts from construction helicopter use would be considered less than significant.

For the reasons described above, the temporary construction noise that would be generated by the proposed project would comply with local standards, and impacts would be less than significant.

### Operation

During operation, noise levels in the project area would not be affected by the proposed project because operational conditions would not change under the proposed project. No operational impacts would occur.

**b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

**Less-than-Significant Impact.** Construction activities may expose persons to excessive groundborne vibration or groundborne noise, causing a potentially significant impact. Information from Caltrans indicates that continuous vibrations with a peak particle velocity (PPV) of approximately 0.2 inches per second (ips) is considered annoying (Caltrans 2020). For context, heavier pieces of construction equipment, such as a bulldozer that may be expected on work sites, have peak particle velocities of approximately 0.089 ips or less at a reference distance of 25 feet (FTA 2018). The closest residential receptors are located near Tower Span 65-4 to 66-1 approximately 0.12 miles (633 feet) to the east. Therefore, at the closest sensitive receptors, vibration levels would not exceed the vibration threshold of annoyance of 0.2 ips PPV. The estimated worst-case construction vibration level of 0.006 ips PPV, would be well below the guidance limit of 0.2 to 0.3 ips PPV for preventing damage to residential structures (Caltrans 2020). Once operational, the project is not expected to feature major producers of groundborne vibration. As such, a less-than-significant impact would occur.

**c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

**No Impact.** The closest airports to the project area are the Agua Dolce Airport, which is a public use airport located 1.31 miles south of Tower 54-2, and the Hollywood Burbank Airport, which is also a public use airport located 9.64 miles southeast of Tower 77-1. While construction crews may hear flight noise, especially those coming and going from the Agua Dolce Airport while working on Tower 54-2, they would only be there for a short duration and would not result in exposure to excessive noise levels. Upon completion of construction activities, operational activities would remain the same as existing conditions. Because no change in operational activities would occur as a result of the proposed project, a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project would not occur. No impact would occur.

## 3.14 Population and Housing

| Would the project:                                                                                                                                                                                                  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

| Would the project:                                                                                                              | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

a) **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

No Impact. The proposed project would correct insufficient ground-to-conductor clearances along existing overhead transmission lines. No new homes, businesses, or infrastructure would be built and the project would not enable any new development to occur. Therefore, the proposed project would not result in direct or indirect population growth. No impact to population growth would occur.

b) **Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No Impact. The project area consists of an existing transmission line corridor, and the proposed project would correct insufficient ground-to-conductor clearances within this corridor. No housing would be removed and no persons would be displaced, therefore, construction of replacement housing elsewhere would not be necessary. No impact would occur.

### 3.15 Public Services

| Would the project:                                                                                                                                                                                                                                                                                                                                                                                                           | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: |                                |                                                    |                              |                                     |
| Fire protection?                                                                                                                                                                                                                                                                                                                                                                                                             | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| Police protection?                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| Schools?                                                                                                                                                                                                                                                                                                                                                                                                                     | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| Parks?                                                                                                                                                                                                                                                                                                                                                                                                                       | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| Other public facilities?                                                                                                                                                                                                                                                                                                                                                                                                     | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

- a) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

***Fire protection?***

No Impact. The need for new or altered fire facilities is typically associated with an increase in population. As described under Section 3.14, the proposed project would not alter population in the project area. As such, the proposed project would not substantially alter service ratios, response times, or other performance objectives to the extent that new or expanded fire protection facilities, equipment, or staff would be required. Therefore, there would be no impact to fire protection.

***Police protection?***

No Impact. The need for new or altered police facilities is typically associated with an increase in population. As described under Section 3.14, the proposed project would not alter population in the project area. As such, the proposed project 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, there would be no impact to police protection.

***Schools?***

No Impact. The need for new or altered schools is typically associated with an increase in population. As described under Section 3.14, the proposed project would not alter population in the project area. As such, the proposed project would not substantially alter the ability of existing schools to accommodate students to the extent that new or expanded school facilities, materials, or staff would be required. Therefore, there would be no impact to schools.

***Parks?***

No Impact. The need for new or altered parks is typically associated with an increase in population. As described under Section 3.14, the proposed project would not alter population in the project area. As such, the proposed project would not substantially alter the ability of parks to serve the region to the extent that new or expanded parks would be required. Therefore, there would be no impact to parks.

***Other public facilities?***

No Impact. Other public facilities include libraries and government administrative services. The need for new or altered libraries or administrative services is typically associated with an increase in population. As described under Section 3.14, the proposed project would not result in the need for libraries or other government administrative services to the extent that new or expanded facilities would be required. Therefore, there would be no impact to other public facilities.

### 3.16 Recreation

| Would the project:                                                                                                                                                                                             | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

**a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

**No Impact.** During times of active construction (grading) within the ROW, public access to the portion of the ROW in which construction is taking place would be precluded. As such, interruptions in off-highway vehicle access to the project area would be temporary and intermittent, and thus, would not result in increased use of other neighborhood and regional parks. Therefore, physical deterioration of facilities would not occur or be accelerated as a result of the proposed project. As discussed in Section 3.14, the proposed project would not result in population increases resulting in an increased need for park facilities. For these reasons, no impact would occur.

**b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

**No Impact.** The proposed project does not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse impact on the environment. As such, no impact would occur.

### 3.17 Transportation

| Would the project:                                                                                                                                      | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| Would the project:                                                                                                                                               | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?                                                                                  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) Result in inadequate emergency access?                                                                                                                        | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**a) *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

*Less-than-Significant Impact.* Construction activities would occur sequentially along the transmission line corridor and would take up to 9 months to complete, assuming 270 workdays per year in the span of up to 2.5 years. Construction at each individual site would last an average of 20 to 30 workdays, with some sites requiring less than 20 days and some sites requiring up to 30 days, depending on the amount of grading and the conditions at the site. The estimated work force for grading operations is between 4 to 6 workers per day. Tower raising activities are expected to require a larger workforce, which is estimated at 12 to 24 workers per site. Tower raising activities would take approximately 7 days per tower, for a total of approximately 56 days of tower raising activities.

Construction workers would be sequentially accessing the 17 individual sites located across the Transverse Ranges through the Santa Clara River Valley, Soledad Canyon, Sierra Pelona Mountains, and LADWP’s Van Norman Complex within an existing utility corridor. Several pieces of construction equipment would also be required at each site (motor graders, bulldozers, excavators, compact skid-steer loaders, dump trucks, water trucks, wheel/track loaders, backhoe loaders, and various small utility vehicles). It is assumed that construction workers would travel to and from the site(s) each day. It is assumed that once the construction equipment is delivered to the first grading location and/or tower raise location, it would be transported from site to site within the existing utility corridor. However, due to the distance between grading sites and tower raise locations, the construction trucks and equipment would occasionally use highways such as SR-138, SR-14, and I-5 to access the next sequential site.

The greatest number of trips would occur for the tower raises. Appendix B CalEEMod inputs assumed 36 worker trips per day, 4 vendor trips per day, and 8 hauling truck trips per day. This would result in a total of 48 one-way trips, or 96 daily trips, traveling a total of approximately 100 miles combined.

Increases in construction traffic in the vicinity of the project area would be temporary and dispersed. The project area is generally undeveloped, and the surrounding land uses primarily consist of vacant land. As such, the addition of approximately 26 one-way daily trips would not adversely affect roadways in the project vicinity. Effects would be short-term, minor, and localized. For these reasons, the proposed project would not conflict with policies establishing measures of effectiveness for the performance of the circulation system, and impacts would be less than significant.

Operation of the project would require maintenance trips which would be same as under existing operations and would not occur on a daily basis. As such, the project is not estimated to generate new operational trips or vehicle miles traveled (VMT). The operational phase would not exceed the Los Angeles Department of Transportation (LADOT) threshold of 250 daily trips, or 110 net daily trips threshold required per Los Angeles County Public Works Department Transportation Impact Analysis Guidelines to require preparation of detailed transportation or traffic analyses. Additionally, because the project would not add 25 or more trips to any Caltrans off ramp facilities in either the morning or afternoon peak hour, it would not have the potential to result in queueing impacts, per LADOT guidance for Freeway Safety Analysis. The project would not conflict with a plan, program, or ordinance addressing the circulation system and impacts would be less than significant.

**b) *Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?***

*Less-than-Significant Impact.* CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts. It is further divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. This project would be categorized under subdivision (b)(3), qualitative analysis. The updated CEQA Guidelines state that “generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts,” and define VMT as “the amount and distance of automobile travel attributable to a project.” “Automobile” refers to on-road passenger vehicles, specifically cars and light trucks. The State of California Office of Planning and Research (OPR) has clarified in its Technical Advisory (OPR 2018) that heavy-duty truck VMT is not required to be included in the estimation of a project’s VMT. Other relevant considerations may include the effects of a project on transit and non-motorized traveled.

This section uses VMT as the basis for evaluating transportation impacts of the proposed project under CEQA. These guidelines and thresholds apply to land use and transportation projects that are subject to CEQA analysis. The proposed project is a land use project; however, it is primarily a construction project that would generate temporary construction-related traffic and thereafter, nominal operations and maintenance traffic. Therefore, it would be categorized under subdivision (b)(3) qualitative analysis for construction phase and Section 15064.3(b)(1) for permanent operations phase.

LADOT guidelines recommend a threshold of significance for land use development (residential, office, and other land uses) and transportation projects. It should be noted that there is no significance threshold for construction or maintenance projects.

The project would involve construction that would generate temporary traffic for approximately 270 workdays spread across 2.5 years. Even though worker and truck trips would generate VMT, once construction is completed, the construction-related traffic would cease and would return to pre-construction conditions. Measures to reduce the VMT generated by workers and trucks are limited, and there are no thresholds or significance criteria for temporary, construction-related VMT. The project construction would be generally consistent with construction activities in terms of the temporary nature of activities, trip generation characteristics, and the types of vehicles and equipment required. The increase in VMT associated with projects’ construction is expected to be temporary and would therefore not cause a significant VMT impact.

Operation of the project would require maintenance trips which would be same as under existing operations and would not occur on a daily basis. As such, the project is not estimated to generate new operational trips or VMT.

The operational phase would not exceed the threshold of 110 or more daily trips or add 25 or more peak hour trips to a Caltrans facility, to require preparation of detailed traffic or safety analyses.

Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Sections 15064.3(b)(1) and 15064.3(b)(3), and impacts would be less than significant.

**c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

**Less-than-Significant Impact.** The proposed project would not alter or introduce any design features or incompatible uses that may increase hazards. Construction trucks and equipment may use roadways such as SR-138, SR-14, and I-5 to access existing dirt roads and access roads when traveling to the proposed grading sites and tower raises. As construction trucks and equipment enter and exit roadways and highways, these maneuvering activities could potentially result in safety impacts as construction vehicles, and slowly accelerating trucks in particular, would be entering and existing highways. However, where appropriate, access to the ROW would be controlled through the use of proper signage and flagging. This would warn oncoming traffic that trucks may be entering or exiting the highway. As such, while temporary and intermittent safety hazards may be created along highways near the project area, impacts would be less than significant because standard construction safety measures would be put in place.

**d) *Would the project result in inadequate emergency access?***

**No Impact.** The proposed project would be located primarily in undeveloped areas of the Transverse Ranges through the Santa Clara River Valley, Soledad Canyon, and Sierra Pelona Mountains within an existing utility corridor. While existing unpaved access roads would be used throughout the construction period, these access roads are located within the existing utility corridor. Temporary use of these access roads would not hinder emergency access. As such, no impact would occur.

### 3.18 Tribal Cultural Resources

| Would the project:                                                                                                                                                                                                                                                                                                                                                                                           | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:                                       |                                |                                                    |                              |                          |
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or                                                                                                                                                                                                               | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>     | <input type="checkbox"/> |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>     | <input type="checkbox"/> |

The evaluation of potential impacts on tribal cultural resources (TCRs) is based on the findings resulting from tribal consultation conducted by LADWP, as the lead agency, as well as the findings of Section 3.5, Cultural Resources, in this IS/MND. Background research conducted to inform this analysis includes a CHRIS database records search conducted at the SCCIC, searches of the NAHC SLF in 2022 and 2024, a review of historical topographic maps and aerial photographs, a cultural resources pedestrian survey of the project area, and the results of formal tribal consultation completed by LADWP pursuant to California Assembly Bill (AB) 52.

#### Native American Heritage Commission Sacred Lands File Search

LADWP requested an NAHC search of the SLF for the project area on August 2, 2022. The SLF consists of a database of known Native American resources. These resources may not be included in the SCCIC database. The NAHC replied via email on September 12, 2022, stating that the SLF search was completed with negative results. Additionally, the NAHC provided a list of 26 California Native American tribal representatives from 19 distinct tribes that should be contacted for more information on potential tribal sensitivities regarding the project.

Dudek requested an updated NAHC search of the SLF for the project area and a 0.5-mile radius on February 14, 2024. The NAHC replied via email on March 1, 2024, stating that the SLF search was completed with positive results, but did not provide details on what the resource(s) are or where they are located. Positive results indicate the presence of Native American cultural resources within 0.5 miles of the project area and not necessarily directly within the project area. The NAHC additionally provided a list of 30 California Native American tribal

representatives from 18 distinct tribes that should be contacted for more information on potential tribal sensitivities regarding the project.

**Assembly Bill 52 Consultation**

The project is subject to compliance with AB 52 (PRC Section 21074), which requires consideration of impacts to TCRs as part of the CEQA process and that the lead agency notify California Native American tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the project. All 19 California Native American tribes identified on the 2022 NAHC contact list were sent letters from LADWP on November 10, 2022, via email and U.S. Postal Service mailing. The notification letters contained a project description, a project location map, outline of AB 52 timing, an invitation to consult, and contact information for the appropriate lead agency representative. Table 3.18-1 summarizes the results of the AB 52 and consultation efforts for the project thus far.

**Table 3.18-1. Assembly Bill 52 Native American Tribal Outreach Results**

| Native American Tribal Representatives                                                                                | Consultation Record                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Annette Ayala, Most Likely Descendant<br>Barbareno/Ventureno Band of Mission Indians                                  | No response has been received to date.                                                                                                                                                                                                                                                                  |
| Dayna Barrios, Chairperson<br>Barbareno/Ventureno Band of Mission Indians                                             | No response has been received to date.                                                                                                                                                                                                                                                                  |
| Julio Quair, Chairperson<br>Chumash Council of Bakersfield                                                            | No response has been received to date.                                                                                                                                                                                                                                                                  |
| Gabe Frausto, Vice Chair<br>Coastal Band of the Chumash Nation                                                        | No response has been received to date.                                                                                                                                                                                                                                                                  |
| Mia Lopez, Chairperson<br>Coastal Band of the Chumash Nation                                                          | No response has been received to date.                                                                                                                                                                                                                                                                  |
| Jairo Avila, Tribal Historic and Cultural Preservation Officer<br>Fernandeno Tataviam Band of Mission Indians (FTBMI) | No response has been received to date.                                                                                                                                                                                                                                                                  |
| Rudy Ortega, Tribal President<br>FTBMI                                                                                | No response has been received to date.                                                                                                                                                                                                                                                                  |
| Sarah Brunzell, Cultural Resources Manager<br>FTBMI                                                                   | <b>November 15, 2022</b><br>Email from Ms. Brunzell to LADWP acknowledging receipt of AB 52 notification letter for the project and requesting consultation. In this correspondence, Ms. Brunzell also requested the NAHC SLF search results and cultural resources reporting prepared for the project. |

**Table 3.18-1. Assembly Bill 52 Native American Tribal Outreach Results**

| Native American Tribal Representatives                                                                 | Consultation Record                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                        | <p><b>July 17, 2024</b></p> <p>Email from LADWP to Ms. Brunzell providing the cultural resources reporting prepared for the project and additional details regarding the depths of ground disturbance for each proposed activity.</p> <p><b>August 5, 2024</b></p> <p>Email from Ms. Brunzell to LADWP requesting tribal monitoring at several work areas.</p> <p><b>October 3, 2024</b></p> <p>Virtual consultation meeting held between LADWP and FTBMI.</p> <p><b>May 23, 2025</b></p> <p>Formal letter sent via email from LADWP to FTBMI Chief Administrative Officer Miguel Luna thanking FTBMI for their input on the project, providing the project’s cultural resources and TCR mitigation measures, and concluding consultation pursuant to AB 52.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>Andrew Salas, Chairperson</p> <p>Gabrieleno Band of Mission Indians – Kizh Nation (Kizh Nation)</p> | <p><b>November 14, 2022</b></p> <p>Email from Brandy Salas (on behalf of Mr. Salas) to LADWP acknowledging receipt of AB 52 notification letter for the project and requesting consultation.</p> <p><b>July 17, 2024</b></p> <p>Email from LADWP to Ms. Salas providing the cultural resources reporting prepared for the project and additional details regarding the depths of ground disturbance for each proposed activity.</p> <p><b>July 2024 – January 2025</b></p> <p>Several follow-up emails between Ms. Salas and LADWP in attempts to schedule a virtual consultation meeting.</p> <p><b>January 15, 2025</b></p> <p>Email from Ms. Salas to LADWP requesting that consultation proceed via email.</p> <p><b>January 15, 2025</b></p> <p>Email from LADWP to Ms. Salas agreeing to consultation via email and providing Ms. Salas with the project’s proposed cultural and tribal cultural resources mitigation measures.</p> <p><b>May 23, 2025</b></p> <p>Formal letter sent via email from LADWP to Kizh Nation Chairperson Andrew Salas thanking Kizh Nation for their input on the project, providing the project’s cultural resources and TCR mitigation measures, and concluding consultation pursuant to AB 52.</p> |

**Table 3.18-1. Assembly Bill 52 Native American Tribal Outreach Results**

| Native American Tribal Representatives                                                                                         | Consultation Record                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Anthony Morales, Chairperson<br>Gabrieleno/Tongva San Gabriel Band of Mission Indians                                          | No response has been received to date.                                                                                                                      |
| Sandonne Goad, Chairperson<br>Gabrielino/Tongva Nation                                                                         | No response has been received to date.                                                                                                                      |
| Robert Dorame, Chairperson<br>Gabrielino Tongva Indians of California Tribal Council                                           | No response has been received to date.                                                                                                                      |
| Christine Conley, Tribal Consultant and Administrator<br>Gabrielino Tongva Indians of California Tribal Council                | No response has been received to date.                                                                                                                      |
| Charles Alvarez<br>Gabrielino-Tongva Tribe                                                                                     | No response has been received to date.                                                                                                                      |
| Robert Martin, Chairperson<br>Morongo Band of Mission Indians                                                                  | No response has been received to date.                                                                                                                      |
| Ann Brierty, Tribal Historic Preservation Officer<br>Morongo Band of Mission Indians                                           | No response has been received to date.                                                                                                                      |
| Violet Walker, Chairperson<br>Northern Chumash Tribal Council                                                                  | No response has been received to date.                                                                                                                      |
| Jill McCormick, Historic Preservation Officer<br>Quechan Tribe of the Fort Yuma Reservation                                    | No response has been received to date.                                                                                                                      |
| Donna Yocum, Chairperson<br>San Fernando Band of Mission Indians                                                               | No response has been received to date.                                                                                                                      |
| San Luis Obispo County Chumash Council                                                                                         | No response has been received to date.                                                                                                                      |
| Jessica Mauck, Director of Cultural Resources<br>San Manuel Band of Mission Indians (Yuhaaviatam of San Manuel Nation or YSMN) | No response has been received to date.                                                                                                                      |
| Ryan Nordness, Cultural Resource Analyst<br>YSMN                                                                               | <b>December 1, 2022</b><br>Email from Mr. Nordness to LADWP acknowledging receipt of AB 52 notification letter for the project and requesting consultation. |

**Table 3.18-1. Assembly Bill 52 Native American Tribal Outreach Results**

| Native American Tribal Representatives                                                   | Consultation Record                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                          | <p><b>July 17, 2024</b></p> <p>Email from LADWP to Kristen Tuosto (on behalf of YSMN) providing the cultural resources reporting prepared for the project and additional details regarding the depths of ground disturbance for each proposed activity.</p> <p><b>August 1, 2024</b></p> <p>Email from Raylene Borrego (on behalf of YSMN) to LADWP providing a series of YSMN-proposed cultural resources and TCR mitigation measures for the project.</p> <p><b>October 21, 2024</b></p> <p>Virtual consultation meeting held between LADWP and YSMN.</p> <p><b>May 23, 2025</b></p> <p>Formal letter sent via email from LADWP to YSMN Director of Cultural Resources Management Alexandra McCleary thanking YSMN for their input on the project, providing the project’s cultural resources and TCR mitigation measures, and concluding consultation pursuant to AB 52.</p> |
| <p>Lovina Redner, Tribal Chair<br/>Santa Rosa Band of Cahuilla Indians</p>               | <p>No response has been received to date.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>Kenneth Kahn, Chairperson<br/>Santa Ynez Band of Chumash Indians</p>                  | <p>No response has been received to date.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>Wayne Walker, Co-Chairperson<br/>Serrano Nation of Mission Indians</p>                | <p>No response has been received to date.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>Mark Cochrane, Co-Chairperson<br/>Serrano Nation of Mission Indians</p>               | <p>No response has been received to date.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>Isaiah Vivanco, Chairperson<br/>Soboba Band of Luiseño Indians</p>                    | <p>No response has been received to date.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>Joseph Ontiveros, Cultural Resource Department<br/>Soboba Band of Luiseño Indians</p> | <p>No response has been received to date.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

a) ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

i) ***Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?***

Less-than-Significant Impact with Mitigation Incorporated. The SCCIC records search identified no previously recorded cultural resources of Native American origin within the project area, though one (P-19-004226) was identified within proximity to Tower 77-1. P-19-004226 is characterized as a prehistoric lithic and groundstone scatter and has not been evaluated for listing on the CRHR. Two NAHC SLF searches were also conducted for the project area, and the 2024 results were positive for Native American cultural resources within the search area (the project area and surrounding 0.5-mile radius), though the NAHC did not provide details on what the resource(s) are or where they are located. Though the pedestrian survey of the project area identified one prehistoric isolate of Native American origin (LADWP-CK-I-001) within the 100-foot corridor work area at Tower Span 35-2 to 35-3, isolates are categorically ineligible for listing on the CRHR and are not considered unique archaeological resources under CEQA. A review of historical topographic maps and aerial photographs also indicates that the project area has been subject to past ground disturbances associated with road grading, vegetation clearing, and the construction of the ADL-RIN L1 transmission line in the 1980s.

As a result of the LADWP's AB 52 notification efforts, three tribal entities requested consultation pursuant to AB 52: the Fernandeno Tataviam Band of Mission Indians (FTBMI), the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh Nation), and the San Manuel Band of Mission Indians (Yuhaaviatam of San Manuel Nation or YSMN).

A virtual meeting was conducted on October 3, 2024, between LADWP and FTBMI. During the meeting, LADWP provided FTBMI with a project overview, a preliminary project schedule, the results of the cultural resources reporting prepared for project, and a series of proposed cultural and tribal cultural resources mitigation measures prepared for the project. Overall, FTBMI agreed with the proposed mitigation measures, but made a suggestion to revise LADWP's inadvertent discovery language to give decision-making authority to consulting Tribe(s) on the disposition of discoveries determined to be Native American in origin and agreed to a rotating Native American monitoring schedule with the other Tribe(s) consulting on the project. On May 23, 2025, LADWP sent a formal letter via email to FTBMI thanking them for their input on the project, providing the project's cultural resources and TCR mitigation measures, and concluding consultation pursuant to AB 52.

Kiz Nation has not responded to subsequent follow-up attempts intended to solicit information regarding any TCRs that may be affected by the project nor provided input regarding LADWP's proposed cultural and tribal cultural resources mitigation measures prepared for the project. On May 23, 2025, LADWP sent a formal letter via email to Kizh Nation thanking them for their input on the project, providing the project's cultural resources and TCR mitigation measures, and concluding consultation pursuant to AB 52.

A virtual meeting was conducted on October 21, 2024, between LADWP and YSMN. During the meeting, LADWP provided YSMN with a project overview, a preliminary project schedule, the results of the cultural resources reporting prepared for project, and a series of proposed cultural and tribal cultural resources mitigation measures prepared for the project. Overall, YSMN agreed with the proposed mitigation measures and agreed to a rotating Native American monitoring schedule with the other Tribe(s) consulting on the project. On May 23, 2025, LADWP sent a formal letter via email to YSMN thanking them for their input on the project, providing the project's cultural resources and TCR mitigation measures, and concluding consultation pursuant to AB 52.

Overall, no previously recorded cultural resources of Native American origin listed on the CRHR or local register were identified within the project area as a result of the SCCIC records search or cultural resources pedestrian survey. Additionally, no TCRs were identified within the project area as a result of AB 52 consultation between the LADWP and FTBMI, Kizh Nation, and YSMN.

However, in acknowledgment of information provided through consultation and in an effort to protect unknown TCRs, LADWP has developed mitigation measures MM-TCR-1 which requires the retention of a Native American monitor prior to the commencement of initial ground-disturbing activities and MM-CUL-1 through MM-CUL-3 (as outlined in Section 3.5) to address potential impacts related to the inadvertent discovery of TCRs during construction.

With implementation of MM-TCR-1 and MM-CUL-1 through MM-CUL-3, potentially significant impacts to unknown TCRs would be reduced to less than significant.

**MM-TCR-1** Native American Monitoring. LADWP shall retain a Native American monitor from interested consulting tribe(s) (Tribes) to monitor project-related ground-disturbing activities as specified by the Environmental Project Manager. Ground-disturbing activities shall include, but are not limited to, demolition, pavement removal, potholing, augering, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. The Native American monitor shall be ancestrally affiliated with the project area and qualified by their tribe or have the approval of one of the Tribes to monitor for tribal cultural resources (TCRs). Monitoring by the Tribes shall be on a rotational basis as outlined in the Cultural Resources Management Plan prepared for the Project. Before initiating ground-disturbing activities, the Native American monitor shall be invited to conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training, which could be held in conjunction with the project's initial on-site safety meeting, shall explain the importance of and legal basis for the protection of significant tribal cultural resources. Each worker shall be notified of the proper procedures to follow in the event that tribal cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include immediately contacting the site supervisor and monitor(s), and work curtailment or redirection, should TCRs be encountered during construction. The training presentation shall be available to additional supervisory or construction personnel who may join after project construction has begun. The Native American monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities; the type of construction activities performed; locations of ground-disturbing activities; soil types; culturally related materials; and any other facts,

conditions, and discovered TCRs, including but not limited to Native American cultural and historical artifacts, remains, places of significance, etc., (collectively referred to as TCRs), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to LADWP upon written request to the Tribes.

- ii) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less-than-Significant Impact with Mitigation Incorporated. Under AB 52, TCRs are defined as resources that the lead agency determines to be a TCR with a substantial burden of evidence. To date, no known TCRs have been identified through consultation that would be impacted by the project. However, the unanticipated discovery of unknown TCRs during project construction is a possibility. The implementation of MM-TCR-1 and MM-CUL-1 through MM-CUL-3 would ensure the proper treatment of unknown TCRs in the event of an unanticipated discovery and would reduce impacts from the proposed project to less than significant.

### 3.19 Utilities and Service Systems

| Would the project:                                                                                                                                                                                                                                                                 | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?                                                                                                                          | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?                                                 | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure,                                                                                                                                                               | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

| Would the project:                                                                                                 | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|--------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| or otherwise impair the attainment of solid waste reduction goals?                                                 |                                |                                                    |                                     |                          |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?***

No Impact. The proposed project would correct nine insufficient ground-to-conductor clearances along an existing overhead transmission line and would raise eight towers. These activities would not increase the amount of water used or wastewater generated at the work sites. Any water associated with the proposed project would consist of water used for dust control during construction activities. This water would be transported to the work sites with a water truck. Thus, no new or expanded water or wastewater treatment facilities would be required due to implementation of the proposed project.

The proposed project would not lead to increased stormwater flows from any of the work sites during either construction or operation. As such, the proposed project would not require the construction of new storm water drainage facilities or expansion of existing facilities.

Furthermore, the proposed project would involve maintenance and modifications to existing electrical transmission lines. No new facilities or towers would be included as part of the project. In addition, no new natural gas or telecommunication facilities would be included. No impact would occur as it relates to this threshold.

**b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

Less-than-Significant Impact. High water demand is typically associated with residential developments, hotels, and other land use intensifying projects. The proposed project is essentially a maintenance and construction project and water needs would be limited to water required for dust control during construction activities, which would be delivered to the project area by water trucks. New or expanded water entitlements would not be required, as water to supply the water trucks would be minor relative to the total water service provided by regional purveyors. Impacts would be less than significant.

- c) **Would the project result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?**

No Impact. The proposed project would not increase the amount of wastewater produced in the project area. No impact would occur.

- d) **Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Less-than-Significant Impact. The grading activities would involve removal of earth materials and placement of excavated soils along existing access roads. The eight transmission tower raising activities may produce minimal amounts of construction debris and would be disposed of at a landfill approved to accept such materials and would be recycled when feasible. Due to the minimal amount of waste that would be produced during construction, area landfills would be able to accommodate any solid waste disposal needs associated with the proposed project. Operational conditions would not change under the proposed project; as such, no solid waste would be produced during operation that would be attributable to the proposed project. Impacts would be less than significant.

- e) **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Less-than-Significant Impact. The proposed project would comply with federal, state, and local statutes and regulations related to solid waste. As discussed in Section 3.18.3(d), construction debris generated by the proposed project would be minimal. Any construction debris that are produced would be recycled or disposed of according to local and regional standards. All materials would be handled and disposed of in accordance with existing local, state, and federal regulations. Compliance with existing regulations would ensure a less-than-significant impact.

### 3.20 Wildfire

| Would the project:                                                                                                                                                                                          | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?                                                                                                                    | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities)                                               | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

| Would the project:                                                                                                                                                                      | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?                                                                                    |                                |                                                    |                                     |                          |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

**No Impact.** The proposed project would be located primarily in undeveloped areas of the Transverse Ranges through the Santa Clara River Valley, Soledad Canyon, and Sierra Pelona Mountains within an existing utility corridor. The majority of work sites would be reached via existing unpaved access roads within the existing utility corridor. Worker, haul, and vendor trips would also likely use surrounding roadways and highways to reach the access roads; however, these trips are temporary and would result in minimal daily trips. The proposed project would be constructed in adherence to the requirements set forth in Title 24, Part 9 of the California Building Code (the Fire Code). During construction of the proposed project, emergency access to the project areas would be adequately maintained to provide emergency services to construction workers along the transmission lines in the event of an emergency. The proposed project would not construct any new structures and the proposed activities would not impair an adopted emergency response plan or emergency evacuation plan.

After construction of the proposed project is complete, each work area would be restored to its original condition to the extent feasible, and operational activities of the transmission lines related to adopted emergency response plans would return to normal. The operations of the project would not interfere with an adopted emergency response plan or emergency evacuation plans. Department vehicle and emergency vehicle access to and from the transmission lines would continue to be provided via the paved and unpaved access roads that run along the entire transmission line alignment. No operational impacts would occur.

**b) *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

**Less-than-Significant Impact.** All of the work areas are within either High or Very High Fire Hazard Severity Zones, with the exception of the tower raises at LADWP’s Van Norman Complex (CAL FIRE 2023). No new infrastructure would be built as part of the project, but construction equipment at the work areas have the potential to ignite or start a fire. With respect to wildfire ignition sources, certain activities may require hot work. Welders and torches would be an open heat source that may result in metallic sparks coming into contact with vegetation. Furthermore, grinders and chainsaws used for vegetation removal/maintenance may result in vegetation ignition from overheating, sparks, or fuel leak. Construction crews shall provide

fire safety measures during construction activities in compliance with Chapter 14 of the California Fire Code. Gasoline-powered or diesel-powered machinery used during construction shall be equipped with standard exhaust controls and muffling devices that will also act as spark arrestors. Fire containment and extinguishing equipment shall be located on site and shall be accessible during construction activities. Construction workers shall be trained in use of the fire suppression equipment and shall not be permitted to idle vehicles on the job site when not in use. Where hot work is necessary, it shall be performed in compliance with the California Fire Code's Chapter 26, "Welding and other Hot Work," and the National Fire Protection Association's 51-B, "Fire Prevention During Welding, Cutting and other Hot Work." Although such activities would have a greater potential for wildfire ignition sources, the proposed project would adhere to the design and construction standards in the latest LADWP Wildfire Mitigation Plan, which is intended to mitigate risks caused by electrical lines and equipment. With adherence to the applicable standards, the impacts related to during construction and operation would be less than significant.

- c) ***Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

Less-than-Significant Impact. All of the work areas are within either High or Very High Fire Hazard Severity Zones, with the exception of the tower raises at LADWP's Van Norman Complex (CAL FIRE 2025). As stated above, some construction activities may result in exacerbation of wildfire risks. Although such activities would have a greater potential for wildfire ignition sources, the proposed project would adhere to the design and construction standards in the latest LADWP Wildfire Mitigation Plan, which is intended to mitigate risks caused by electrical lines and equipment. . Therefore, the proposed project would not exacerbate wildfire risk, and impacts would be less than significant.

- d) ***Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

Less-than-Significant Impact. Project construction would result in ground surface disruption that could temporarily alter on-site drainage patterns. However, runoff in the project areas would be managed through implementation of the BMPs outlined in the SWPPP. Upon operation, the project areas would maintain the general existing drainage pattern of the utility corridor and its surrounding area. Impacts would be less than significant.

### 3.21 Mandatory Findings of Significance

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of other current projects, and the effects of probable future projects.)                                                                                                                                                                     | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                                                          | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

**Less-than-Significant Impact with Mitigation Incorporated.** The proposed project is located within an existing utility corridor, within the northern half of Los Angeles County, and generally straddles the Transverse Ranges through the Santa Clara River Valley, Soledad Canyon, and Sierra Pelona Mountains. As explained in Section 3.4, Biological Resources, and Section 3.5, Cultural Resources, the proposed project has the potential to significantly affect biological and cultural resources, including special-status wildlife and plant species and unearthed archeological resources. However, mitigation measures have been set forth to reduce the impacts of the proposed project on wildlife species, plant and animal communities, and cultural resources. Biological mitigation would ensure avoidance of protected plant species to the extent feasible, proper translocation of larger perennial protected plants if avoidance is not feasible, and implementation of a restoration plan to return the construction areas to their original condition. Cultural resources mitigation would include archaeological monitoring, tribal monitoring, and

implementation of treatment plans if significant resources are encountered during construction. Upon implementation of the mitigation measures identified in Sections 3.4 and 3.5, the proposed project would not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Upon implementation of the mitigation measures identified in Section 3.5, impacts of the proposed project to California history or prehistory would be less than significant. As such, impacts to biological and cultural resources would be less than significant with mitigation incorporated.

- b) ***Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of other current projects, and the effects of probable future projects.)***

Less-than-Significant Impact with Mitigation Incorporated. The proposed project would occur within an existing utility corridor. As shown in Sections 3.3, Air Quality; 3.13, Noise; and 3.17, Transportation, the temporary construction activities of the proposed project would not generate substantial air emissions, noise, or traffic. As such, project construction would not combine with other nearby construction projects in the Mojave Desert to produce cumulatively considerable impacts in those categories. As shown in Sections 3.1, Aesthetics; 3.2, Agriculture and Forestry Resources; and 3.16, Recreation, adverse impacts are not anticipated due to the temporary nature of the proposed project. As such, the proposed project would not combine with other projects to produce a cumulative effect on aesthetics, agricultural resources, or recreation, since the impacts of the proposed project would be limited in duration and the construction sites would be returned to their original state once construction is completed. Implementation of mitigation measures for biological and cultural resources, would ensure that the proposed project would not contribute to cumulative impacts on special-status species, nesting birds, and archaeological resources. As explained in Section 3.14, Population and Housing, the proposed project would not result in a population change in the project area. As such, resources that can be affected by population growth, such as those described in Sections 3.15, Public Services, and 3.16, Recreation, would not be substantially affected by the proposed project.

The proposed project would not alter operational conditions. As such, the proposed project would not contribute any operational noise impacts, air emissions, or traffic to the project area with the potential to combine with related projects. As such, the cumulative impacts of the proposed project would be less than significant.

- c) ***Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

Less-than-Significant Impact. Implementation of the proposed project would not result in any impacts that are significant and unavoidable or cumulatively considerable. The analysis presented in this document does not identify significant adverse impacts on human beings. The impacts were characterized as absent or less than significant. Therefore, the proposed project would not have environmental impacts that would cause substantial adverse impacts on human beings, either directly or indirectly.

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## 4.2 Report Preparers

### Lead Agency

Los Angeles Department of Water and Power  
Corporate Environmental Affairs  
Environmental Planning and Assessment  
111 North Hope Street, Room 1044  
Los Angeles, California 90012  
Jane Hauptman, Manager of Environmental Planning and Assessment  
Jazmin Martin, Project Manager

## Technical Assistance Provided By

Dudek  
225 South Lake Avenue  
Suite M210  
Pasadena, California 91101

## Contributors

Alexandra Martini, Project Manager  
Tracy Park, Biologist  
Dylan Duvergé, Hydrogeologist  
Andrew Gries, GIS

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