



# Scattergood-Olympic

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## TRANSMISSION LINE PROJECT

### FINAL ENVIRONMENTAL IMPACT REPORT

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# CHAPTER 1: INTRODUCTION/OVERVIEW

## 1.1 ORGANIZATION OF THE DOCUMENT

This document is the Final Environmental Impact Report (EIR) for the Scattergood-Olympic Transmission Line Project (SOTLP or Project). In accordance with the California Environmental Quality Act (CEQA) Guidelines Sections 15088, 15089, and 15132, responses to comments are included. Under CEQA, the lead agency, the Los Angeles Department of Water and Power (LADWP), must review, evaluate, and prepare written responses to comments on environmental issues received on the Draft EIR.

As per CEQA Guidelines Section 15132, a Final EIR must include the following elements:

- The Draft EIR or a revision of that draft.
- Comments and recommendations received on the Draft EIR either verbatim or in summary form.
- A list of persons, organizations, and public agencies that commented on the Draft EIR.
- The response of the lead agency to significant environmental points raised in the review and consultation process.
- Any other information added by the lead agency.

This Final EIR includes the following sections:

**Chapter 1** provides an overview of the Final EIR, the Project environmental review process, and a summary of the Project and alternatives.

**Chapter 2** provides a list of comments received on the Draft EIR, copies of the written comments (numerically coded for reference), a summary of the oral comments received at the public meetings, and the lead agency's responses to the comments.

**Chapter 3** includes all corrections and additions to the Draft EIR text. Any changes in the text are indicated by underline/strikeout revisions.

**Appendix A** includes the Mitigation Monitoring and Reporting Program (MMRP) required by CEQA Guidelines Section 15097.

**Appendix B** includes the California Coastal Commission Coastal Development Permit exemption approval.

The Draft EIR (both the primary volume and the appendices), as issued for public review on March 22, 2012, is incorporated herein by reference and not included in its entirety within this Final EIR. The Draft EIR is revised as shown in Chapter 3 of this Final EIR. Both this document and the Draft EIR, as revised in Chapter 3, comprise the Final EIR.

## 1.2 ENVIRONMENTAL REVIEW PROCESS

LADWP issued a Notice of Preparation (NOP) of the Draft EIR on October 8, 2010 that formally announced the preparation of an environmental document for the SOTLP.

The NOP was sent to 25 agencies (city, county, State, and federal), two Native American Tribes, six elected officials, and seven community organizations. Two public scoping meetings in an open house format were conducted at two west Los Angeles locations; the scoping meetings were advertised in 13 local newspapers. A total of 70 people signed in at the public scoping meetings. A total of 54 comments

were received during the scoping period, which began on October 12, 2010, and ended on November 12, 2010. The comments on the NOP were considered by the lead agency in determining the scope of issues to be addressed in the Draft EIR.

Upon completion and finalization of the Draft EIR, it was circulated for the CEQA mandated 45-day public review period, which began on March 22, 2012, and ended on May 7, 2012. Per CEQA Guidelines 15085, a Notice of Completion was filed with the State of California Governor's Office of Planning and Research (State Clearinghouse) on March 22, 2012. The Notice of Availability (NOA) of a Draft EIR was filed with the Los Angeles City and County Clerks on March 19, 2012 and March 21, 2012, respectively (per CEQA Guidelines Section 15087). The NOA announced the commencement of the public review of the Draft EIR and two public meetings (April 11 and 12, 2012). The NOA was mailed to 30 agencies, 28 organizations, and 166 interested individuals, and also e-mailed to 113 interested individuals. In addition, postcards announcing the availability of the Draft EIR and public meetings were mailed to approximately 4,900 residents and businesses along the proposed route. A legal notice of availability of the Draft EIR and public meetings was published in the *Los Angeles Times* on March 22, 2012. The meetings were also advertised in four local newspapers, as well as on the City Watch website.

The City of Los Angeles Board of Water and Power Commissioners (Board) will consider the SOTLP for approval at a regularly scheduled meeting (the specific date of the meeting is to be announced). The Board will hold a public hearing regarding the Project and must certify the Final EIR prior to making any decision regarding the approval of the proposed Project.

The Board will consider all information in the record, including the Draft EIR, comments, responses to comments, the MMRP, and any testimony prior to making its decision. The Board will consider staff recommendations, including:

- A recommendation as to whether the Final EIR document has been completed in accordance with CEQA and should be certified by the Board;
- A recommendation regarding approval of the proposed Project;
- A recommendation regarding adoption of the MMRP; and
- A recommendation regarding findings and possible conditions that may override significant environmental impacts of the Project.

Should the Board approve the proposed Project, LADWP will file a Notice of Determination (NOD) with the Los Angeles City Clerk and County Clerk and the State Clearinghouse. The filing of the NOD completes the CEQA environmental review process.

## **1.3 PROJECT OBJECTIVES**

The purpose of the proposed SOTLP is to accommodate the Scattergood Generating Station's (SGS) existing 830 megawatts (MW) of power with the following basic objectives:

- Enhance reliability and improve flexibility of the Scattergood Transmission System;
- Better utilize the energy produced from the SGS; and
- Comply with federally mandated standards.

### **1.3.1 Enhance Reliability and Improve Flexibility**

The current SGS' maximum gross output is 830 MW. The addition of a redundant transmission line path from SGS to Olympic Receiving Station (Olympic RS) would allow the transfer of the maximum SGS output in a more sustainable manner. It would also allow LADWP to redirect power and perform maintenance on underground transmission lines without disrupting service or limiting the SGS output.

limiting the SGS output. Furthermore, implementing the proposed Project would reduce, or avoid, the need for emergency system repairs such as those that have occurred as a result of having only one Scattergood-Olympic transmission line circuit in place.

### **1.3.2 Better Utilize Energy Produced from SGS**

The current SGS transmission system only marginally accommodates the power produced from the SGS. The SGS must operate with the Remedial Action Scheme (RAS) to protect the existing Scattergood Transmission circuits from severe overloads resulting from the loss of any single existing Scattergood Transmission System circuit. When any one of the three Scattergood transmission circuits relays, the remaining two circuits are subject to potentially damaging overloads unless Scattergood generation can be rapidly reduced. The purpose of the Scattergood RAS is to prevent overloading of the remaining Scattergood Transmission System lines by tripping generating units when failure of an existing transmission line occurs.

### **1.3.3 Comply with Federally Mandated Standards**

The North American Electric Reliability Corporation (NERC) regulates the reliability of the electric power grid for North America. Current standards require that utility companies meet the “N-1” reliability requirements for having sufficient generation and transmission resources to serve the energy needs of the power system at all times. The ability for electric utility companies to operate following the loss of any one major equipment unit (single contingency loss), such as a transmission line, is called “N-1” capability. In this instance, if a transmission line circuit is faulted or taken out of service, the electrical power flow automatically redirects to other system transmission lines, causing an increase in loading to the lines still in operation. The NERC standard requires utility companies to adequately accommodate such a situation without further exacerbating the loss of lines due to an electrical “overload” of the remaining transmission lines.

Currently, only one 230 kilovolt (kV) transmission line connects the SGS to Olympic RS. The construction of the proposed SOTLP would create a second 230 kV line and comply with the “N-1” reliability requirements.

## **1.4 SUMMARY OF THE PROPOSED PROJECT AND ALTERNATIVES**

### **1.4.1 Proposed Project**

LADWP is proposing to construct and operate approximately 11.4 miles of new 230 kV underground transmission line that would connect the SGS and Olympic RS. The Project would also include minor modifications to the SGS and Olympic RS to allow the new transmission line to connect into the stations. The Project would be located in Los Angeles, with a small portion crossing through Culver City. Portions of the proposed alignment are adjacent to the cities of El Segundo and Santa Monica, as well as the unincorporated community of Marina Del Rey. The addition of a new underground transmission line would enhance the reliability and operational flexibility of power transferred from the SGS to the Olympic RS.

The transmission line would be installed underground from the SGS in Playa Del Rey along Grand Avenue heading west, then would head northwest along Vista Del Mar, east onto Sandpiper Street, slightly north onto Pershing Drive, east on Westchester Parkway, north on Loyola Boulevard, northeast on La Tijera Boulevard, northwest on Lincoln Boulevard, northeast on Culver Boulevard, northwest on Centinela Avenue and Bundy Drive, and west onto Olympic Boulevard, and terminate at the Olympic RS. Figure ES-1 in the Draft EIR illustrates the proposed alignment.

The Draft EIR for the Project was prepared in accordance with CEQA as amended (Public Resource Code Section 21000 et seq.) and the State Guidelines for the Implementation of CEQA (CEQA Guidelines) as amended (California Code of Regulations Section 15000 et seq.). The Draft EIR complies with requirements of the CEQA Guidelines Section 15080 through 15097 regarding the EIR process.

The Draft EIR analyzed potentially significant environmental impacts of the proposed Project. Potential cumulative impacts, which are the effects of the proposed Project in conjunction with past, present, and reasonably foreseeable future projects in the surrounding area, were also analyzed. The Draft EIR found that the proposed Project would result in significant inmitigable temporary impacts associated with the construction phase of the Project—specifically noise and traffic impacts during Project construction. However, no significant, irreversible long-term impacts would result from the Project, nor would the Project result in permanent substantial changes in the environment.

Table 1.1 summarizes the potential impacts of the proposed Project evaluated in detail in the Draft EIR, indicating the level of significance of the impacts based on the analysis conducted for the EIR (utilizing significance thresholds based on the environmental checklist questions presented in Appendix G of the CEQA Guidelines), feasible mitigation measures that could lessen significant impacts, and the level of significance of the impacts after the application of the mitigation measures.

**Table 1.1. Project Impact Summary**

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance After Mitigation
<b>Air Quality and Greenhouse Gas Emissions</b>			
The proposed Project would not conflict with or obstruct implementation of the applicable air quality plan.	Less than significant	No mitigation measures are required	Less than significant
The proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.	Less than significant	No mitigation measures are required	Less than significant
The proposed Project would not 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 (including emissions which exceed quantitative thresholds for ozone precursors).	Less than significant	No mitigation measures are required	Less than significant
The proposed Project would not expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates.	Less than significant	No mitigation measures are required	Less than significant
The proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than significant	No mitigation measures are required	Less than significant
The proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Less than significant	No mitigation measures are required	Less than significant
<b>Biological Resources</b>			
The proposed Project would not 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 Game or U.S. Fish and Wildlife Service.	Less than significant	No mitigation measures required	Less than significant
The proposed Project could 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 Game or U.S. Fish and Wildlife Service.	Significant	<b>BIO-1:</b> The proposed Project would not discharge groundwater to the Ballona Creek or Ballona Wetland habitat.	Less than significant
The proposed Project could have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	Significant	See Mitigation Measure BIO-1 above.	Less than significant

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance After Mitigation
The proposed Project could 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.	Significant	<p><b>BIO-2:</b> If construction activities on or around Lincoln Boulevard Bridge crossing over Ballona Creek are scheduled to occur during the breeding season (February 1 to August 31), preconstruction surveys for nesting birds shall be conducted. The preconstruction nest survey would include a visual examination of potential nest sites beneath the bridge.</p> <p>If nesting birds are found, a buffer around the nest would be erected to ensure that Project activities are not conducted within the buffer(s) until the nesting cycle is complete or the nest fails due to non-Project related reasons.</p> <p>Nesting opportunities on the underside of the bridge may also be limited by covering areas of the exposed bottom deck with temporary netting or removing unoccupied, inactive mud nests or partial nests that may be present from previous nesting attempts. A Project Biologist with nest deterrent experience will evaluate and accept proposed nest deterrent efforts prior to the start of nesting season (February 1).</p>	Less than significant
The proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Less than significant	No mitigation measures required	Less than significant
The proposed Project would not 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	No mitigation measures required	No impact
<b>Cultural and Paleontological Resources</b>			
The proposed Project could cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.	Significant	<p><b>CUL-1:</b> Construction would be monitored by a qualified archaeologist during trenching and other ground-disturbing activities when that disturbance occurs in native soil, and any native soil that is removed will be made accessible to the archaeological monitor. Should previously unrecorded cultural resources be discovered during construction, construction would halt until the on-site cultural resource monitor and Native American monitor have had the opportunity to investigate the resource and assess its significance.</p> <p>The portions of the route that would be monitored for cultural resources when construction occurs within native soils are:</p> <ul style="list-style-type: none"> <li>• Vista Del Mar from Imperial Highway to Sandpiper Street;</li> <li>• Sandpiper Street;</li> </ul>	Less than significant



Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> <li>• W. Westchester Parkway between Pershing Drive and Stanmoor Drive;</li> <li>• Lincoln Boulevard between 83<sup>rd</sup> Street and Culver Boulevard; and</li> <li>• Culver Boulevard between Lincoln Boulevard and Centinela Avenue</li> </ul> <p><b>CUL-2:</b> Native American monitors shall observe construction-related ground disturbance in native soil within the areas specified in CUL-1.</p> <p><b>CUL-3:</b> Before the initiation of ground-disturbing activities, all construction personnel shall be trained regarding the recognition of possible subsurface cultural resources and protection of all cultural resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural resources.</p>	
The proposed Project could cause a substantial adverse change in the significance of an archaeological resource as defined in California Code of Regulations Section 15064.5.	Significant	See Mitigation Measures CUL-1 through CUL-3 above.	Less than significant
The proposed Project could disturb any human remains, including those interred outside of formal cemeteries.	Significant	See Mitigation Measures CUL-1 through CUL-3 above.	Less than significant
The proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Significant	<p><b>PR-1:</b> Based on the location of highly sensitive underlying geologic formations, a qualified paleontologist shall be retained to design and implement a paleontological resource mitigation plan (PMTP). The qualified paleontologist shall attend relevant pre-construction meetings to consult with grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. The PMTP shall identify construction impact areas where high sensitivity paleontological resources may be encountered and the depths at which those resources are likely to occur. The PMTP shall outline a coordination strategy for monitoring, detail significance criteria used to determine data potential of resources, and describe methods of recovery, preparation, analysis, and final curation of specimens.</p> <p><b>PR-2:</b> A paleontological monitor shall be retained on a full-time basis to monitor Project-related excavations in areas underlain by formations of high sensitivity for paleontological resources. The areas deemed to have potential for presence of paleontological resources that shall be</p>	Less than significant

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance After Mitigation
		<p>monitored during construction-related excavation include:</p> <ul style="list-style-type: none"> <li>• Lincoln Boulevard between Jefferson Boulevard and 83<sup>rd</sup> Street</li> <li>• Centinela Avenue between Ocean Park Boulevard and Venice Boulevard</li> </ul> <p><b>PR-3:</b> Before the initiation of ground-disturbing activities, all construction personnel shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of paleontological resources.</p> <p><b>PR-4:</b> When fossils are discovered, the qualified paleontologist (or paleontological monitor) shall recover them. In the instance of an extended salvage period, the paleontologist shall work with the construction manager to temporarily direct, divert, or halt earthwork to allow recovery of fossil remains in a timely manner. Because the potential for the recovery of small fossil remains, such as isolated mammal teeth, as determined by a qualified paleontologist, it may be necessary to collect bulk samples (up to 6,000 pounds) of sedimentary rock matrix.</p> <p><b>PR-5:</b> Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, and cataloged as part of the mitigation program. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited in a federally accredited repository for both vertebrate and invertebrate fossils such as the Natural History Museum of Los Angeles County or the Museum of Paleontology at the University of California, Berkeley. A final summary report shall be completed that outlines the results of the mitigation program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.</p>	
<p><b>Geology and Soils</b></p> <p>The proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:</p> <p>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map</p>	<p>Less than significant</p>	<p>No mitigation measures required.</p>	<p>Less than significant</p>

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance After Mitigation
issued by the State Geologist for the area or based on other substantial evidence of a known fault. ii) Strong seismic ground shaking. iii) Seismic-related ground failure, including liquefaction. iv) Landslides			
The proposed Project would not result in substantial soil erosion or the loss of topsoil.	Less than significant	No mitigation measures required.	Less than significant
The proposed Project would not 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	No mitigation measures required	Less than significant
The proposed Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life and property.	No impact	No mitigation measures required.	No impact
The proposed Project would not 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	No mitigation measures required.	No impact
<b>Hazards, Health, and Safety</b>			
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.	Less than significant	No mitigation measures required.	Less than significant
The proposed Project would not 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	No mitigation measures required.	Less than significant
The proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Less than significant	No mitigation measures required.	Less than significant
The proposed Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.	Less than significant	No mitigation measures required.	Less than significant
Although the proposed Project would be located within an airport land use plan, the underground transmission line would not result in a safety hazard for people residing or working in the Project area.	No impact	No mitigation measures required.	No impact

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance After Mitigation
The proposed Project is not located within the vicinity of a private airstrip, and therefore would not result in a safety hazard for people residing or working in the Project area.	No impact	No mitigation measures required.	No impact
The proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	Less than significant	No mitigation measures required.	Less than significant
The proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	No impact	No mitigation measures required.	No impact
<b>Noise</b>			
Construction of the proposed Project would result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Significant	<p><b>NOI-1:</b> Within the city limits of Los Angeles, construction operations would not occur between the hours of 9:00 p.m. and 7:00 a.m.; in any residential zone, or within 500 feet of land so occupied, before 8:00 a.m. or after 6:00 p.m. on any Saturday; nor at any time on Sunday. Construction operations are also restricted in Culver City, but can occur between 8:00 a.m. and 8:00 p.m. Monday through Friday, 9:00 a.m. and 7:00 p.m. on Saturdays, and 10:00 a.m. and 7:00 p.m. on Sundays. These hours comply with local noise ordinances.</p> <p><b>NOI-2:</b> All noise-producing Project equipment and vehicles using internal combustion engines (including haul trucks) will be professionally fitted with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features. These devices will be professionally maintained in good operating condition so as to meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., air compressors) will be equipped with shrouds and noise control features that are readily available for that type of equipment.</p> <p><b>NOI-3:</b> Material stockpiles and mobile equipment staging, parking, and maintenance areas will be located as far as practicable from noise-sensitive receptors.</p> <p><b>NOI-4:</b> The use of noise-producing signals, including horns, whistles, alarms, and bells, will be for safety warning purposes only.</p> <p><b>NOI-5:</b> Electrically powered equipment instead of pneumatic or internal combustion-powered equipment will be used, where feasible.</p>	Significant

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance After Mitigation
		<p><b>NOI-6:</b> No Project-related public address or music system will be audible at any adjacent receptor.</p> <p><b>NOI-7:</b> Within 10 days of commencement of construction, the Project applicant will provide notice of construction schedule to surrounding neighborhoods and will post information on the site in a location visible to the public, including the hours of operation and contact person with telephone number.</p>	
The proposed Project would not result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	Less than significant	No mitigation measures required.	Less than significant
The proposed Project would not result in the substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.	No impact	No mitigation measures required.	No impact
The proposed Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.	Significant	See Mitigation Measures NOI-1 through NOI-7 above.	Significant
The proposed Project is located adjacent to Los Angeles International Airport and Santa Monica Airport; however, operation of the proposed Project would not expose people to excessive noise levels.	No impact	No mitigation measures required.	No impact
The proposed Project is not within the vicinity of a private airstrip, and therefore would not expose people residing or working in the Project area to excessive noise levels.	No impact	No mitigation measures required.	No impact
<b>Traffic and Transportation</b>			
The proposed Project would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	Significant	<b>TR-1: Transportation Management Plans (TMPs).</b> Prior to construction, a Traffic Management Plan (TMP) would be prepared and submitted to all agencies with jurisdiction of public roads that would be affected by the underground transmission line construction. TMPs would define the use of flag persons, warning signs, lights, barricades, cones, etc. according to standard guidelines outlined in the Caltrans Traffic Manual, the Standard Specifications for Public Works Construction, and the Work Area Traffic Control Handbook (WATCH).	Significant
The proposed Project would not conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management	Less than significant	No mitigation measures required.	Less than significant

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance After Mitigation
agency for designated roads or highways.			
The proposed Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.	No impact	No mitigation measures required.	No impact
The proposed Project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	No impact	No mitigation measures required.	No impact
The proposed Project would not result in inadequate emergency access.	Less than significant	No mitigation measures required.	Less than significant
The proposed Project would conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	Significant	See Mitigation Measure TR-1 above.	Less than significant
<b>Water Quality and Hydrology</b>			
The proposed Project would not violate any water quality standards or waste discharge requirements.	No impact	No mitigation measures required.	No impact
The proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.	No impact	No mitigation measures required.	No impact
The proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.	No impact	No mitigation measures required.	No impact
The proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site.	No impact	No mitigation measures required.	No impact
The proposed Project would not 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.	No impact	No mitigation measures required.	No impact
The proposed Project would not substantially degrade water quality.	No impact	No mitigation measures required.	No impact
The proposed Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard	No impact	No mitigation measures required.	No impact

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance After Mitigation
delineation map.			
The proposed Project would not be placed within a 100-year flood hazard area structures which would impede or redirect flood flows.	No impact	No mitigation measures required.	No impact
The proposed Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	No impact	No mitigation measures required.	No impact
The proposed Project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.	No impact	No mitigation measures required.	No impact

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## 1.4.2 Alternatives

In accordance with the CEQA Guidelines, the Draft EIR evaluated alternatives to the proposed Project. Alternatives considered include transmission system alternatives, other routing alignments, non-wire alternatives, and the No Project Alternative (refer to Chapter 3 [Alternatives] of the Draft EIR for detailed discussion regarding alternatives considered for the proposed Project). An evaluation of a No Project Alternative is required in accordance with Section 15126.6(e) of the CEQA Guidelines.

Taking into account the Project objectives, siting criteria, and public and agency input, combinations of potential alternative alignments consisting of “links” (refer to Figure 3.2-2 of the Draft EIR) were evaluated to arrive at potential overall alternative routing alignments for the Project. As a result of this process, two alternative alignments were identified: the Sawtelle Boulevard and Sepulveda Boulevard Routing Alignments (refer to Section 3.5 [Alternative Project Routing Alignments] of the DEIR for detailed discussion regarding the characteristics of these two alternative routing alignments). While the Sawtelle Boulevard and Sepulveda Boulevard Routing Alignments would attain the objectives of the Project, neither of these alternative routing alignments would avoid or minimize impacts that would be generated by the proposed routing alignment. Rather, the longer construction durations associated with these alternative alignments would expose the public to additional construction-related impacts (i.e., air quality, noise, and traffic impacts) as compared to the proposed routing alignment. Therefore, the Sawtelle Boulevard and Sepulveda Boulevard Routing Alignments were eliminated from detailed analysis in the Draft EIR.

CEQA Guidelines Section 15126.6(e)(2) requires that an EIR’s analysis of alternatives identify the “environmentally superior alternative” among all of those considered. If the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Under CEQA, the goal of identifying the environmentally superior alternative is to assist decision-makers in considering project approval; it does not require an agency to select the environmentally superior alternative.

The No Project Alternative would not create any impacts, temporary or permanent, since no construction activities would occur. However, LADWP must provide safe and reliable electrical service, and the long-term impacts related to increased unreliability would remain. Therefore, it is reasonably foreseeable that the No Project Alternative would lead to the construction of a new transmission line, either overhead or underground, to reliably transfer existing power generated from the SGS. This would result in impacts equal to or greater than the proposed Project. For these reasons, the No Project Alternative is determined to not be the environmentally superior alternative.

Impacts from the proposed Project are temporary construction impacts directly related to the length of the alignment and duration of construction. Because the proposed Project would be the shortest of the considered alignments, it would result in the fewest impacts related to air quality/greenhouse gas emissions, noise, and traffic and transportation. Therefore, the proposed Project is considered to be the environmentally superior alternative.

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## CHAPTER 2: RESPONSE TO COMMENTS

### 2.1 INTRODUCTION

The Scattergood-Olympic Transmission Line Project (SOTLP) Draft EIR 45-day review period began on March 22, 2012. During this public review period, a total of 13 written comments were received, including one comment card received during the Draft EIR public meetings held on April 11 and 12, 2012. Oral comments were also received at the meetings.

According to CEQA Guidelines Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” This chapter of the Final EIR is organized as follows: Section 2.2, Written Comments and Responses; and Section 2.3, Summary of Oral Comments Received at the Public Meetings and Responses.

The comment letters are numbered and responses are labeled accordingly. For example, response 1-1 refers to the response to the first comment in comment letter 1. Comments were evaluated, and good faith, reasoned responses were prepared for substantive comments referencing significant environmental issues or issues relating to the adequacy of the EIR (California Environmental Quality Act [CEQA] Guidelines, Section 15088). Those comments that did not address the adequacy of the Draft EIR, raise significant environmental issues, or request additional information/analysis did not require a substantive response.

Numerous comments, in both written and oral form, closely paralleled other submitted comments. In order to reduce redundancy, some responses refer the reader to a previously provided response to a similar comment.

### 2.2 WRITTEN COMMENTS AND RESPONSES

Table 2-1 lists all the written comments from agencies, elected officials, organizations, and interested individuals.

**Table 2-1. Written Comments from Agencies, Elected Officials, and Organizations**

Letter	Agency/Organization	Date
1	State of California Governor's Office of Planning and Research State Clearinghouse <i>Signed: Scott Morgan, Director</i>	May 8, 2012
2	Metro <i>Signed: Scott Hartwell, CEQA Review Coordinator</i>	April 26, 2012
3	City of El Segundo <i>Signed: Kimberly Christensen, Planning Manager</i>	April 20, 2012
4	City of Culver City <i>Signed: John M. Nachbar, City Manager</i>	May 3, 2012
5	Department of Transportation (Caltrans) <i>Signed: Diana Watson, IGR/CEQA Branch Chief, District 7</i>	May 10, 2012
6	Gabrieleño Band of Mission Indians/Kizh Tribe of the Los Angeles Basin <i>Signed: Andy Salas, Chairman</i>	April 6, 2012
7	Del Rey Residents Association <i>Signed: Elizabeth A. Pollock, President</i>	May 7, 2012
8	Bill Pope	March 26, 2012
9	Don Sriro	March 26, 2012

Letter	Agency/Organization	Date
10	Derek Davis	March 26, 2012
11	Renato & Kimberly Basile	March 27, 2012
12	Dorothy Garven	March 27, 2012
13	Christopher McKinnon	April 11, 2012

## 2.2.1 Letter 1: State Clearinghouse



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

May 8, 2012

Julie Van Wagner  
Los Angeles County Department of Water and Power  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Subject: Scattergood-Olympic Transmission Line Project  
SCH#: 2009091085

Dear Julie Van Wagner:

1-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on May 7, 2012, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Morgan".

Scott Morgan  
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report  
State Clearinghouse Data Base**



EDMUND G. BROWN JR.  
GOVERNOR

**SCH#** 2009091085

STATE OF CALIFORNIA

**Project Title** Scattergood-Olympic Transmission Line Project

**Lead Agency** Los Angeles County

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

**Type** EIR Draft EIR

**Description** Note: Review per lead



KEN ALEX  
DIRECTOR

The City of Los Angeles Department of Water and Power (LADWP) proposes to construct and operate approximately 11.4 miles of new 230-kilovolt underground transmission line that would connect the Scattergood Generating Station (SGS) in Playa del Rey and Olympic Receiving Station (RS) in western Los Angeles. The Project would also include minor modifications to the SGS and Olympic RS to allow the new transmission line to connect into the stations. The new underground transmission line would enhance the reliability and operational flexibility of power transferred from the SGS to the Olympic RS, better utilize the energy produced from the SGS, and comply with federally mandated standards.

**Lead Agency Contact**

**Name** Julie Van Wagner  
**Agency** Los Angeles County Department of Water and Power  
**Phone** 213-367-5295 **Fax**  
**email**  
**Address** 111 North Hope Street, Room 1044  
**City** Los Angeles **State** CA **Zip** 90012

**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Lat / Long**  
**Cross Streets** 1840 Centinela Avenue, Los Angeles to 12700 Vista Del mar, Los Angeles  
**Parcel No.**  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** I-10, 405, SR-405, 99  
**Airports** LAX, Santa Monica  
**Railways** Los Angeles County Metro  
**Waterways** Ballona & Centinela Creek, Pacific Ocean  
**Schools** Saint Bernard HS  
**Land Use**

**Project Issues** Archaeologic-Historic; Biological Resources; Coastal Zone; Geologic/Seismic; Landuse; Noise; Other Issues; Public Services; Schools/Universities; Toxic/Hazardous; Traffic/Circulation; Water Quality; Wetland/Riparian; Air Quality; Recreation/Parks; Soil Erosion/Compaction/Grading

**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; California Energy Commission; Native American Heritage Commission; Public Utilities Commission; Santa Monica Bay Restoration

**Date Received** 03/21/2012 **Start of Review** 03/22/2012 **End of Review** 05/07/2012

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Note: Blanks in data fields result from insufficient information provided by lead agency.

### **Response 1-1**

This letter acknowledges that LADWP has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act. No State agencies submitted comment letters for the proposed Scattergood-Olympic Transmission Line Project. No response is necessary because no issues related to the adequacy of the environmental impact analysis in the Draft EIR were raised.

## 2.2.2 Letter 2: Metropolitan Transportation Authority (Metro)



Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

# Metro

April 26, 2012

Ms. Julie Van Wagner  
Environmental Project Manager  
Los Angeles Department of Water and Power  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Re: Scattergood-Olympic Transmission Project

Dear Ms. Van Wagner:

2-1

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Scattergood-Olympic Transmission Project. The Los Angeles County Metropolitan Transportation Authority (LACMTA) is responding in the capacity as a responsible agency with respect to the proposed project's potential impacts on Metro and municipal transit services:

2-2

Several transit corridors with Metro bus service could be impacted by the project. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Other Municipal Bus Service Operators including Culver City Bus may also be impacted and therefore should be included in construction outreach efforts.

MTA looks forward to reviewing the Final EIR. If you have any questions regarding this response, please contact me at 213-922-2836 or by email at hartwells@metro.net.

Please send the Final EIR to the following address:

MTA CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Scott Hartwell

Sincerely,

Scott Hartwell  
CEQA Review Coordinator, Long Range Planning



### **Response 2-1**

This comment presents introductory remarks and does not address specific issues or concerns related to the adequacy of the environmental impact analysis in the Draft EIR. No response is necessary.

### **Response 2-2**

As discussed on page 4-117 of the Draft EIR, affected local jurisdictions (e.g., City of Culver City) and transit agencies (e.g., Metro) would be consulted during preparation of Traffic Management Plans (TMPs) to minimize impacts to passenger loading areas and to minimize travel times on scheduled transit routes. The contact information for each affected agency would be listed in the TMP.

### 2.2.3 Letter 3: City of El Segundo



## City of El Segundo

### Planning & Building Safety Department

**Elected Officials:**

*Carl Jacobson,*  
Mayor  
*Suzanne Fuentes,*  
Mayor Pro Tem  
*Bill Fisher,*  
Council Member  
*Dave Atkinson,*  
Council Member  
*Marie Fellhauer,*  
Council Member  
*Tracy Weaver,*  
City Clerk  
*Chris Powell,*  
City Treasurer

**Appointed Officials:**

*Greg Carpenter,*  
City Manager  
*Mark D. Hensley,*  
City Attorney

**Department Directors:**

*Deborah Cullen,*  
Finance/Human Resources  
*Kevin Smith,*  
Fire Chief  
*Debra Brighton,*  
Library Services  
*Sam Lee,*  
Planning and Building  
Safety  
*Mitch Tavera,*  
Police Chief  
*Stephanie Katsouleas,*  
Public Works  
*Robert Cummings,*  
Recreation & Parks

[www.elsegundo.org](http://www.elsegundo.org)

April 30, 2012

Ms. Julie Van Wagner  
Los Angeles County Department of Water and Power  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

**RE: DRAFT Environmental Impact Report for the Scattergood-Olympic Transmission Line Project.**

Dear Ms. Van Wagner:

The City of El Segundo appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the Scattergood-Olympic Transmission Line Project. The City has the following comments:

- 1) **Construction Duration.** The Draft EIR identifies that the City of Los Angeles Rush Hour Ordinance limits in-street construction on weekdays to the hours of 9:00 AM to 3:30 p.m. The Draft EIR then states the project will request a variance to allow for extended construction hours. The rationale for the request is the variance will reduce the overall construction time for the project from 36 months to 18 to 24 months. Construction hours are proposed to be Monday to Friday 7:00 AM to 5:00 PM and Saturday 8:00 AM to 6:00 PM. The City of El Segundo supports the Project's variance request as it will reduce the duration of traffic impacts on major roadways adjacent to the City, such as Vista Del Mar, Grand Avenue and Pershing Drive. In addition, the City would also support efforts to reduce the estimated construction duration on Vista Del Mar from the identified 160 to 180 days to a shorter period of time.
- 2) **Air Quality - Construction.** The Draft EIR identifies that standard construction dust control measures to reduce emission of fugitive dust to the extent possible will be implemented. Please identify the specific dust control measures that will be implemented to give a better understanding of the extent of dust control that will occur. The City of El Segundo has

3-1

3-2

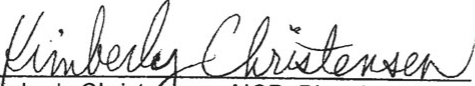
3-3

350 Main Street, El Segundo, California 90245-3813  
Phone (310) 524-2380 FAX (310) 322-4167

- 3-3  
cont.
- 3) **Air Quality – Operational.** The Draft EIR identifies (Page 1-3) the addition of a redundant transmission line path from Scattergood Generating Station (SGS) to Olympic Receiving Station would allow the transfer of the maximum SGS output in a more sustainable manner. Would this result in operational changes at the SGS facility? If the length of operation time or an increase in power generation was to occur at the SGS facility would this increase operational air quality impacts on the City of El Segundo? If this Project will allow for more intensive utilization of the SGS facility then the operational air quality impacts on the residents of El Segundo should be evaluated. Please clarify if operational air quality impacts are covered in any CEQA documentation that may have been prepared for the SGS Repowering Project.
- 3-4
- 4) **Traffic Management Plan (TMP).** Traffic Mitigation Measure TR-1 identifies that a TMP will be prepared and submitted to all agencies with jurisdiction over public roads that would be affected by the underground transmission line construction. The City of Los Angeles and City of Culver City are identified as the affected jurisdictions. As lane closures resulting from this project could affect traffic access into and out of the City of El Segundo, the City requests to be consulted during the preparation of the Project TMP for portions of the TMP devoted to Vista Del Mar, Grand Avenue and Pershing Drive. The TMP should clearly identify truck haul routes on Vista Del Mar and Imperial Highway/I-105 and identify that trucks will not cut through the City of El Segundo. The TMP should include noticing requirements to the City's Planning and Building Safety Department, Public Works Department, Fire Department and Police Department when construction is scheduled for Vista Del Mar and Grand Avenue a minimum of seven days in advance of any construction.
- 3-5
- 5) **Noise – Construction.** Noise mitigation measure NOI-7 requires notice of construction schedule to surrounding neighborhoods. The City of El Segundo requests that residents of the bluffs above Vista Del Mar be included in this notification. Notice should occur to residential properties within one residential block of the bluffs above the SGS facility and Hyperion.
- 3-6
- 6) **Cumulative Projects List.** The most recent version of the cumulative projects list generated by the City of El Segundo is attached for your reference. The list of projects included in the Draft EIR does not accurately reflect the projects the City has identified as pending or under construction in the City.
- 3-7

Thank you for the opportunity to comment on the Scattergood-Olympic Transmission Line Project. If you have any questions regarding El Segundo's comments, please contact Kimberly Christensen, Planning Manager at (310) 524-2340 or Masa Alkire, Principal Planner at (310) 524-2371.

Sincerely,

  
Kimberly Christensen, AICP, Planning Manager  
Planning and Building Safety Department

Attachment: City of El Segundo Cumulative Projects List, dated April 2012.

Cc: Karl Berger, Assistant City Attorney  
Greg Carpenter, City Manager  
Mark Hensley, City Attorney  
Sam Lee, PBS Director

**CITY OF EL SEGUNDO CUMULATIVE PROJECTS LIST  
(MAJOR PROPOSED & APPROVED BUT NOT CONSTRUCTED PROJECTS)**

3-7 cont.

April 2012

No.	EA #	Ord # / Reso	Address	Existing sq. ft.	Existing Use	Approved/ Proposed sq. ft. *	Approved/ Proposed Use	Approval & Expiration
1	548	Ord. 1345 CC Reso. 4241	700 N. Nash 800 N. Nash El Segundo Corporate Campus	0	Vacant	1,740,000 87,000 100,000  248,000  5 acre	Office, Hotel Light Industrial / R & D  Commercial Retail Park	Approved; 197,300 sf Office/Light Industrial - Occupied 18,700 Retail - Occupied 83,855 sf Hotel - In Construction
2	N/A		301 Vista Del Mar		Power Plant		Redevelopment of power plant	Approved by CEC.
3	622		2350 E. El Segundo Blvd.	120,000	Office	177,400 s.f. office 15,900 sf lab	Office Lab	Approved; 177,400 sf Office completed, 15,900 s.f. of Lab pending
4	717		616-620 W. Imperial Avenue		Vacant	32,000 sf	12-Unit Residential Condominium	Approved by PC on 3/27/08 - In Construction
5	768	Ord. 1382 & 1417	850 S. Sepulveda Blvd.	0	Vacant – formerly Industrial	70,000	Shopping center uses	Approved – Pending Plan Check Submittal
6	766		525 N. Sepulveda Blvd.	0	Parking Lot	328,532	1,029 space Parking Structure	Application incomplete – awaiting re-submittal
7	773		101 Continental Blvd.	0	Parking Lot	61,104 sf	167 Room Hotel	Approved – Pending Plan Check Submittal
8	781		301,303,305 Palm Avenue		9 apts	14,313 sf	7-Unit Residential Condominium	Approved by Planning Commission on Feb. 12, 2009. Pending plan check submittal
9	784		445 N. Douglas Street	223,000 (106,000 Office; 117,000 Warehouse)	Industrial	332,137 sf	Data Center	Approved – October 23, 2008. In construction, 158,624 sf complete.
10	786		444 North Nash Street	82,857	Vacant	116,756 sf	Data Center	Approved – Dec. 11, 2008; In construction
11	EA-791 CUP 08-02		888 N. Sepulveda Blvd.	0	Vacant	88,859	9-story, 179-room hotel	Application on hold
12	EA-799 CUP 08-06		1960 E. Grand Avenue	0	Surface parking	90,827 sf	150 room hotel	Application on hold
13	EA-836		Two potential locations: 301 Maryland St or 219 W Mariposa Av.	0	Various	4,500 – 6,000 s.f. bldg. & 1-2 pools	Municipal Pool	Decision on location not made
14	EA-865	Reso 2677	105 Vista Del Mar	0	None	1,400 s.f.	Lifeguard station	Approved, under construction

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3-7 cont.

No.	EA #	Ord # / Reso	Address	Existing sq. ft.	Existing Use	Approved/ Proposed sq. ft. *	Approved/ Proposed Use	Approval & Expiration
15	EA-890		540 E Imperial Ave	22,500 s.f.	School	58- 304 residential units (Up to 175,000 s.f.)	304 Senior Housing / Assisted Living Facility or 58 Single and Multi-Family Residential Units	Application Approved – Pending Plan Check Submittal
16	EA-899		116 W El Segundo Blvd	0	Oil Refinery Site	38,000 s.f.	Office / Operations Center	Approved – In Construction
17	EA-905		2100 E El Segundo Blvd	1.85 million s.f.	Light Industrial/Office	3.7 million s.f.	Office, Retail, Warehouse, Light Industrial	Application incomplete 350,000 s.f office, 50,000 s.f. light industrial, and 50,000 s.f. retail projected by the end of 2015. Full build-out projected by 2022
18	EA-912		600-630 Sepulveda	7,100 s.f.	Sit down Dining (Sizzler)	3714 s.f. and 900 s.f. of outdoor dining	Fast Food w Drive Through (In-n-out)	Application Submitted – Incomplete. Pending re-submittal
19	EA-921		2041 Rosecrans Ave	1,848 s.f. restaurant area and 461 s.f. outdoor dining area	Full Service Restaurant	1,926 s.f. restaurant area and 988 s.f. outdoor dining area	Full Service Restaurant	Application Approved – In construction
20	EA-940		455 Continental Blvd	0	N/A	300,000 s.f. R&D & office 715-space parking structure	R&D and office and Parking structure	Application Submitted – Incomplete. Pending re-submittal
21			1955 E Grand Ave	55,000 s.f.	Office	255,000 s.f. office & 894-space parking structure	Office and Parking Structure	
	EA-948		240 Center St	3,378 s.f.	Office	3,378 s.f.	Animal Hospital	Application Approved – In construction
22	EA-958		1700 E Mariposa Ave	0	N/A	9 residential condo units	9-unit subdivision for residential condos	Application Submitted – Incomplete. Pending re-submittal
23	EA-959		222 Kansas St	0	N/A	Office: 30,660 s.f. USDA facility: 45,152 s.f. (40.6% office, 31.13% lab, 28.27% warehouse)	Two office buildings, each divided into 10 condominium units and an animal and plant inspection facility.	Application Submitted – Incomplete. Pending re-submittal
24	EA-960		343 Coral Circle	19,095 s.f.	Church	14,667 s.f. church 4428 s.f. middle school	Church and Middle School	Application submitted – Incomplete. Pending re-submittal
	EA-		130 Arena St	0	N/A	386 s.f. of	Office and	Application approved – In

Revised 4/19/12

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No.	EA #	Ord # / Reso	Address	Existing sq. ft.	Existing Use	Approved/ Proposed sq. ft. *	Approved/ Proposed Use	Approval & Expiration
25	961					6,301 s.f. office and 3019 s.f. warehouse	warehouse	construction
26	EA-963		2345 Alaska Ave and 2352 Utah Ave	60,920 s.f.	Light Industrial	60,920 s.f.	Offices and broadcasting studio	Application submitted – pending Planning Commission review
27	EA-968		140 Washington St	17,625 s.f.	Light Industrial	17,625 s.f.	Office	Application submitted – Pending Director review
28	EA-971		444 N Nash St	116,756 s.f.	Data Center	215,510 s.f.	Data Center	Application submitted – Pending review (Also see No. 10 – EA-786)
<p><b>* NOTE:</b> The Approved/Proposed sq. ft. column indicates the total expected development on the site taking into account any existing buildings to remain or to be demolished. It is not in addition to any existing buildings, but the aggregate.</p>								

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### **Response 3-1**

This comment presents introductory remarks and does not address specific issues or concerns related to the adequacy of the environmental impact analysis in the Draft EIR. No response is necessary.

### **Response 3-2**

The commenter's support for a variance to the City of Los Angeles' Rush Hour Ordinance along Vista Del Mar, Grand Avenue, and Pershing Drive is noted.

### **Response 3-3**

Table 4.2.1-4 (Estimated Construction Emissions) on page 4-19 of this Draft EIR lists the anticipated fugitive dust that would occur with construction of the proposed Project. As stated on pages 4-16 and 4-23 of the Draft EIR, South Coast Air Quality Management District (SCAQMD) Rule 403 ("Fugitive Dust") would apply to the proposed Project during construction. The standard construction dust control measures that would be implemented to reduce emissions of fugitive dust during Project construction include: during earth-moving activities, water shall be applied to soil not more than 15 minutes prior to moving soil; water shall be applied or a temporary covering shall be installed to open storage piles; and all haul vehicles shall be covered. Implementation of these standard dust control measures would reduce fugitive dust by 61% and impacts to air quality would be less than significant.

### **Response 3-4**

The proposed Project would construct and operate a new 230 kV underground transmission line and would also include minor modifications to the Scattergood Generating Station (SGS) and Olympic Receiving Station to connect the new transmission line. The objectives of the proposed Project are to enhance reliability and improve flexibility of the Scattergood Transmission System, better utilize the energy produced at the station, and comply with federally mandated standards. The proposed Project would not increase power generation or result in any operational changes at SGS.

As discussed on page 1-3 of the Draft EIR, LADWP is also proposing the Scattergood Generating Station Unit 3 Repowering Project, which would replace SGS generation Unit 3 and physically and permanently derate (i.e., reduce the generation capacity of) SGS generation Unit 1. The Scattergood Generating Station Unit 3 Repowering Project has a different timeline and project objectives from the proposed Project addressed herein; therefore, it was determined that separate EIRs would be prepared for the two proposed projects. The EIR for the Scattergood Generation Station Unit 3 Repowering Project was made available for public review on May 17, 2012 and is available online at [www.ladwp.com/envnotices](http://www.ladwp.com/envnotices). Please refer to that document for a discussion of the proposed changes to the SGS and the resulting air quality impacts.

### **Response 3-5**

As stated on page 4-107 of the Draft EIR, construction of the proposed underground transmission line is anticipated to require the closure of one to two travel lanes along the proposed routing alignment; however, it is anticipated that two-way travel along the affected roadways would be maintained during construction. As further discussed on page 4-117 of the Draft EIR, existing on-street parking along the Project alignment would be utilized as traffic lanes to minimize traffic lane closures during construction. Directional capacity (generally northbound/westbound in the a.m. peak and southbound/eastbound in the p.m. peak) would also be considered in roadway closure planning where work area placement is flexible; this will be taken into consideration in the Project's TMP. The TMP will account for project construction on the affected roadways along the proposed Project route, including, but not limited to, Vista Del Mar, Grand Avenue, and Pershing Drive. Because all roadways would remain open in both directions during



construction, it is not anticipated that there will be direct or indirect impacts to any streets within the City of El Segundo. Once completed and approved by the City of Los Angeles Department of Transportation (LADOT), a copy of the TMP may be obtained by contacting LADOT.

The Project construction contractor would, as necessary, obtain permits from the pertinent jurisdictions for hauling of oversized equipment and materials. Furthermore, the construction contractor, in coordination with LADWP, would provide advance notice of construction to affected jurisdictions as required per their respective ordinances regarding noticing for construction-related activities.

### ***Response 3-6***

As stated in Mitigation Measure NOI-7 on page 4-92 of the Draft EIR, LADWP would provide notice of the construction schedule to surrounding neighborhoods. In that regard, LADWP would coordinate with the City of El Segundo to provide advance notice to pertinent areas of residential development regarding forthcoming Project-related construction. In addition, a point of contact for reporting Project-related construction concerns would be provided in the notice.

### ***Response 3-7***

Based on a review of the cumulative projects list provided by the City of El Segundo, three additional proposed projects, as compared to those identified in Table 4.1-1 (Cumulative Projects List) of the Draft EIR, are located within one mile of the proposed Project alignment. This includes the following projects: (1) a 12-unit condominium development at 616-620 W. Imperial Avenue; (2) a 7-unit condominium development at 301, 303, and 305 Palm Avenue; and (3) a warehouse/office building at 130 Arena Street. Due to the relatively small size and nature of development associated with the above-listed proposed projects, cumulative impacts above and beyond those identified in the Draft EIR are not expected to occur. Nonetheless, LADWP appreciates the City of El Segundo providing the additional information regarding proposed and recently approved projects.

## 2.2.4 Letter 4: City of Culver City



JOHN M. NACHBAR  
City Manager

CITY MANAGER'S OFFICE  
CITY OF CULVER CITY

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

(310) 253-6000  
FAX (310) 253-6010

May 3, 2012

Scattergood-Olympic Transmission Line Project  
Los Angeles Department of Water and Power  
Attn: Ms. Julie Van Wagner  
Environmental Program Manager  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

**Subject: Comments on Scattergood-Olympic Transmission Line Project Draft EIR**

Dear Ms. Van Wagner:

4-1 [ The City of Culver City has reviewed the Draft EIR for the Scattergood-Olympic Transmission Line Project. Included herein, please find our comments.

If you have any questions, please do not hesitate to call Ms. Helen Kerstein, Management Analyst, at (310) 253-5618.

Sincerely,

John M. Nachbar  
City Manager

cc: Charles D. Herbertson, Public Works Director/City Engineer  
Art Ida, Transportation Director  
Sol Blumenfeld, Community Development Director  
Thomas Gorham, Planning Manager, Community Development Department  
Roland Miranda, Deputy City Attorney  
Barry Kurtz, Consulting Traffic Engineer, Public Works Department  
Diana Chang, Senior Management Analyst, Transportation Department  
Helen Kerstein, Management Analyst, Public Works Department

**Ms. Julie Van Wagner**  
**Comments on Scattergood-Olympic Transmission Line Project Draft EIR**  
**May 3, 2012**  
**Page 2 of 3**

Traffic

- 4-2 | 1. It is estimated that the construction duration along Centinela Avenue will be 160 to 170 days. Work areas are planned to be 10 to 12 feet in width, which would require the closure of one or two travel lanes, based on the width of the travel lanes. Where striped center two-way left-turn lanes exist, it was assumed that the closure would encompass the center lane plus one of the adjacent travel lanes. Thus, the project construction has the potential to affect Culver City traffic and parking.
- 4-3 | 2. The segment of Centinela Avenue in Culver City from Washington Place to Washington Boulevard was not included in the analysis. It should be analyzed. The traffic study analyzed the project's impact during construction on roadway segments, rather than the impact at intersections. The analysis should include the anticipated impacts to the intersections of Centinela Avenue at Washington Place and Centinela Avenue at Washington Boulevard in Culver City.
- 4-4 | 3. The City of Culver City would like the opportunity to review the traffic control plans for any road construction on Culver City roads. Advance notice should be provided to inform motorists of the road work.

Bicycles

- 4-5 | 1. On page 4-105, the description says "Bicycle paths in the Los Angeles area fall into three classes." The term bikeway should be used as a general term and the term bike path should be reserved for Class I bicycle facilities.
- 4-6 | 2. On page 4-116, the text indicates that the Ballona Creek Bike Path starts at Jefferson, but it actually starts at National Boulevard; the text also mischaracterizes the Strand Bike Path and South Bay Trail.
- 4-7 | 3. Additional discussion should be included regarding identifying and signing alternative routes for cyclists and/or providing construction zone warning signage related to watching/sharing the road through the construction zones, so as to mitigate the construction impact on cyclists and make the construction zone safer for cyclists.

Transit

1. On page 4-105:
- 4-8 | a) The description of Culver CityBus should be corrected to reflect "Culver CityBus" instead of "Culver City Bus" (3 words). This correction should be made in other parts of the DEIR that reference Culver CityBus; and,
- 4-9 | b) The service area should be corrected to reflect "40" square miles; and,
- 4-10 | c) "Rancho Park" is misspelled – the draft EIR spells it as "Ranch Park"; and,

**Ms. Julie Van Wagner**  
**Comments on Scattergood-Olympic Transmission Line Project Draft EIR**  
**May 3, 2012**  
**Page 3 of 3**

- 4-11 d) The routes located in the Project area should also include Line 7 (Culver CityBus), which runs on Culver Boulevard from downtown Culver City to Marina del Rey.
- 4-12 2. The Project is anticipated to create severe impacts to the bus lines in the Project area. Culver CityBus Lines 2, 5, and 7 will be directly and severely impacted by the Project, while Line 1, which runs on Washington Boulevard, will be indirectly impacted by the spillover traffic. Should a bus stop need to be relocated due to the Project work, the Project needs to notify and work with Culver CityBus to identify and relocate the bus stop at least 2 weeks in advance of the work that will impact the bus stop.
- 4-13 3. Page 4-177 describes the preparation of a Traffic Management Plan (TMP), and it indicates that “the design of traffic management plans would be performed in consultation with local transit agencies to minimize impacts to passenger loading areas and to minimize travel times on scheduled transit routes. All affected transit agencies would be contacted to provide for any required modifications or temporary relocation of transit facilities.” It is important to note that Culver CityBus (and all other transit agencies) have routes in multiple jurisdictions and that it is important to start involving the transit agencies in the design of the TMP (in LA and Culver City) early in the process. **The TMP needs to provide traffic control plans specific to detours and lane closures in regard to bus operations. The TMP also needs to clearly show how and where various construction phases will impact the bus operations in the Project area. If any change on the TMP needs to occur after consultation with the transit agencies, the Project should notify and consult with the transit agencies immediately.** During the construction, the Project should notify Culver CityBus (and other impacted transit agencies) at least two (2) weeks in advance if there is any change in construction schedule/phase timing and identify the impact to the bus facilities and bus operations.
- 4-14 4. A communication plan should be created that details when and how the Project will work with the transit agencies on minimizing the impacts of the Project on the bus service in the Project area.
- 4-15 5. Page 4-118 under f), the second paragraph describes the bus service that may be affected as a result of Project construction, and it should include “Line 1” and “Line 7” under Culver CityBus' service.

Other

- 4-16 1. On page 4-86 the description says that the project traverses approximately 430 feet within Culver City. The section of Centinela Avenue within Culver City extends closer to 1,300 feet.

### **Response 4-1**

This comment presents introductory remarks and does not address specific issues or concerns related to the adequacy of the environmental impact analysis in the Draft EIR. No response is necessary.

### **Response 4-2**

It is anticipated that the underground transmission line would be constructed within the center of the street; however, the specific location of the installation of the proposed transmission line would be determined during final design of the Project. During construction of the proposed Project, and as stated on page 4-116 of the Draft EIR, no complete street closures are anticipated. Furthermore, and as discussed on page 4-117 of the Draft EIR, existing on-street parking along the Project route would be utilized as traffic lanes to minimize traffic lane closures during construction. Directional capacity would also be considered in roadway closure planning where work area placement is flexible. Left-turn lanes and other approach lanes (as feasible) would be maintained in close proximity to major intersections along the proposed Project route.

As described on page 4-119 of the Draft EIR, Mitigation Measure TR-1 requires that LADWP prepare a TMP to minimize traffic-related impacts during Project construction. Preparation of the TMP would be coordinated with, and approved by, the City of Culver City and would define the sequence of construction operations and the measures that would be used to control the flow of traffic (e.g., use of flag persons, warning signs, lights, barricades, cones). As detailed in the Draft EIR, construction of the proposed Project would result in significant, yet temporary, unavoidable impacts to traffic. However, and as stated on page 4-117 of the Draft EIR, “[a]fter completion of construction, operation of the proposed 230 kV underground transmission line would not generate additional traffic; therefore, the Project would not result in permanent impacts to traffic.”

### **Response 4-3**

As listed in Table 4.2.7-4 (2011 Average Daily Traffic Volumes and LOS) on page 4-101 of the Draft EIR, traffic counts were taken on Centinela Avenue between Venice Boulevard and Washington Place (Segment 7) and between Washington Boulevard and Mindanao Way (Segment 8). Roadway Segment 7 is located immediately north of the limits of the City of Culver City, and Segment 8 extends into the City of Culver City and includes Washington Boulevard southward to Mindanao Way. As shown in Table 4.2-7-10 (Future [2014] with Project Construction) of the Draft EIR, roadway Segments 7 and 8 are anticipated to temporarily operate at LOS F in both the a.m. and p.m. peak hours during Project construction. The roadway section along Centinela Avenue between Washington Place and Washington Boulevard includes similar roadway characteristics (e.g., number of lanes and on-street parking) to roadway Segments 7 and 8. Accordingly, it would be expected that temporary impacts during Project construction along this segment of Centinela Avenue would be similar to the impacts along Segments 7 and 8.

As discussed on page 4-106 and 107 of the Draft EIR, a street segment analysis is appropriate for assessing impacts associated with long linear projects, such as the proposed Project. Intersection analyses are typically performed for projects, such as residential or commercial development projects, that have a defined source of traffic generation. In addition, and for intersection locations along the proposed Project alignment, the potential closure of approach lanes would be determined through the creation of the TMP; therefore, no specific intersection analyses were performed as part of the traffic impact analysis in the Draft EIR for the proposed Project. LADWP would prepare a TMP in coordination with, and subject to approval by, the affected local jurisdictions (including the City of Culver City). A key objective of the TMP would be to identify measures (e.g., use of flag persons, warning signs, lights, barricades, cones) to minimize disruptions to traffic flow. With specific regard to roadway intersections, trenching activities

would be segmented through intersections, such that four-way traffic is maintained. Once trenching through a portion of the intersection is complete, the open trench would be covered with steel plates and the next portion of the intersection would be trenched. During off-construction periods, steel plates would be placed over the open trenches to allow vehicles to utilize the entire width of the roadway and associated travel lanes, thereby affording the full range of turning movements at intersections.

#### **Response 4-4**

Refer to Response 4-2. Prior to construction, signs would be posted within the construction zones notifying motorists of dates and times of construction.

#### **Response 4-5**

The comment indicates that the term “bikeway” should be used as a general term when not referencing specific bicycle facilities, and the term “bike path” should be used in reference to specific Class I bicycle facilities. This text revision has been made to the “Bicycle Facilities” discussion in Section 4.2.7 of the Draft EIR, as shown in Chapter 3 of this Final EIR.

#### **Response 4-6**

The comment states that the starting point of the Ballona Creek Bike Path starts at National Boulevard, and not at Jefferson Street as reported on page 4-116 of the Draft EIR. This text revision has been made to the Draft EIR to account for this comment, as shown in Chapter 3 of this Final EIR. This comment also states that the “Strand Bike Path” and “South Bay Trail” should be identified as such in the EIR, as opposed to “Strand bicycle path” and “South Bay Bike Trail” as included on page 4-116 of the Draft EIR. Reference to these facilities has been revised, per the comment, as included in Chapter 3 of this Final EIR.

#### **Response 4-7**

As stated on page 4-119 of the Draft EIR, Mitigation Measure TR-1 requires that LADWP prepare a TMP to minimize traffic-related impacts during Project construction; this would apply to both vehicle and bicycle traffic. Preparation of the TMP would be coordinated with, and approved by, the City of Culver City and would include the necessary detail regarding signage and traffic safety protocol for bicyclists to ensure safety in the construction zone.

#### **Response 4-8**

The comment indicates that the term “Culver CityBus” was incorrectly referenced as “Culver City Bus” in the Draft EIR. Section 4.2.7 of the Draft EIR, as shown in Chapter 3 of this Final EIR, has been revised to reference the term “Culver CityBus” in lieu of “Culver City Bus.”

#### **Response 4-9**

The comment states that the service area of Culver CityBus is 40 square miles, not 25.5 square miles as reported on page 4-105 of the Draft EIR. Section 4.2.7 of the Draft EIR, as shown in Chapter 3 of this Final EIR, has been revised to state that the service area of Culver CityBus is 40 square miles.

### **Response 4-10**

This comment indicates that the term “Ranch Park,” as included on page 4-105 of the Draft EIR, should be referenced as “Rancho Park.” Section 4.2.7 of the Draft EIR, as described in Chapter 3 of this Final EIR, has been revised to reference the term “Rancho Park” in lieu of “Ranch Park.”

### **Response 4-11**

This comment states that Culver CityBus Line 7, which runs on Culver Boulevard from downtown Culver City to Marina del Rey, is also located within the Project area. Section 4.2.7 of the Draft EIR, as included in Chapter 3 of this Final EIR, has been revised to state that Culver CityBus Line 7 is located in the Project area.

### **Response 4-12**

As discussed on pages 4-115 and 4-116 of the Draft EIR, where bus stops would be affected by Project-related construction activities, temporary bus stop closures would be accommodated with replacement bus stops outside of the immediate work area. As further discussed on page 4-117 of the Draft EIR, a TMP would be prepared in consultation with affected local jurisdictions (e.g., City of Culver City) and transit agencies (e.g., Culver CityBus) to minimize impacts to passenger loading areas and travel times on scheduled transit routes. Transit agencies will be notified at least two weeks in advance of bus stop relocations or changes to the construction schedule.

### **Response 4-13**

Refer to Responses 4-2 and 4-12 above discussing the consultation, preparation, and coordination of the TMP.

### **Response 4-14**

In addition to including measures to control the flow of traffic during Project construction, the TMP, prepared and implemented in coordination with affected jurisdictions (e.g., City of Culver City) and transit agencies, would include details regarding notification of the proposed Project’s construction to transit agencies, as well as list the contact information of those agencies.

### **Response 4-15**

The comment states that the discussion on page 4-118 of the Draft EIR regarding impacts to bus service should include reference to Culver CityBus “Line 1” and “Line 7.” Section 4.2.7 of the Draft EIR, as included in Chapter 3 of this Final EIR, has been revised to include reference to Culver CityBus Line 1 and Line 7 as routes that could be affected by Project construction.

### **Response 4-16**

This comment indicates that the distance of the proposed transmission line route within the City of Culver City is approximately 1,300 feet, as compared to 430 feet as noted on page 4-86 in the Draft EIR. Chapter 3 of this Final EIR includes the revision of the distance of the proposed transmission line route within the City of Culver City to 1,300 feet.

## 2.2.5 Letter 5: California Department of Transportation (Caltrans)

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN, JR., Governor

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, OFFICE OF REGIONAL PLANNING  
AND PUBLIC TRANSPORTATION  
IGR/CEQA BRANCH  
100 MAIN STREET, MS # 16  
LOS ANGELES, CA 90012-3606  
PHONE: (213) 897-9140  
FAX: (213) 897-1337



*Flex your power!  
Be energy efficient!*

May 10, 2012

Mr. Julie Van Wagner  
Los Angeles Department of Water and Power  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Re: *Scattergood-Olympic Transmission Line*  
Draft Environmental Impact Report  
IGR/CEQA No. 120339/EA, SCH #2009091085  
Vic. LA-001-PM 29.00 – 30.50

Dear Ms. Van Wagner:

5-1 Thank you for including the California Department of Transportation in the environmental review process for the proposed construction of a new 230 Kilovolt underground transmission line. The proposed transmission line would connect the Scattergood Generating Station in Playa del Rey and Olympic Receiving Station in western Los Angeles.

Based on the information contained in the Draft Environmental Impact Report, we have the following comments:

5-2 • We note all three alignment alternatives are expected to cross I-10 and would be place on or along Lincoln Boulevard which is State Route 1. We remind you that any work on or affecting State highway right-of-way will require an encroachment permit from Caltrans. Information regarding permit requirements may be obtained by calling Caltrans' District 7 Office of Permits at (213) 897-3631 or going to the following website: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>

5-3 • We acknowledge mitigation measure TR-1 that requires the preparation of Transportation Management Plans (TMPs) prior to construction. TMPs would define the use of flag persons, detour and warning signs, lights, barricades, cones, etc. Caltrans requests an opportunity to review and approve transportation management plans for work on Lincoln Boulevard and for the crossing of I-10.

5-4 • Construction related truck activity expected to utilize State highway facilities should be scheduled off peak commuting periods as much as possible.

If you have any questions regarding our comments, you may contact project coordinator Elmer Alvarez at (213) 897 – 6696 or email at [Elmer\\_Alvarez@dot.ca.gov](mailto:Elmer_Alvarez@dot.ca.gov). Please refer to our record number 120339/EA.

Sincerely,

A handwritten signature in black ink, appearing to read "Dianna Watson".

DIANNA WATSON  
IGR/CEQA Branch Chief  
Caltrans, District 7

*"Caltrans improves mobility across California"*



### **Response 5-1**

This comment presents introductory remarks and does not address specific issues or concerns related to the adequacy of the environmental impact analysis in the Draft EIR. No response is necessary.

### **Response 5-2**

As described on Page 1-9 of the Draft EIR, Table 1.7-1 (Authorizations, Permits, and Approvals), LADWP would obtain an encroachment permit from Caltrans for all construction that may occur across or within State highway rights-of-way.

### **Response 5-3**

As described in mitigation measure TR-1, and prior to construction, a TMP would be prepared and submitted to all agencies with jurisdiction of public roads that would be affected by the underground transmission line construction. For construction activities on Lincoln Boulevard and crossing the Interstate-10, the TMP would be submitted to Caltrans for approval.

### **Response 5-4**

As described on pages 2-6 through 2-10 of the Draft EIR, the proposed underground transmission line would be constructed in segments, and construction of multiple segments would occur simultaneously at various locations along the transmission line alignment. Delivery of construction equipment and materials would be dispersed along the transmission line alignment through the course of the work day and, therefore, construction-related truck activity would not be concentrated in one particular area or time of the day. As also described on page 2-9 of the Draft EIR, LADWP would seek to obtain a variance to the City of Los Angeles Mayor's Executive Directive No. 2 to allow Project construction during peak commuting periods. Obtaining the variance is subject to the approval of the City of Los Angeles LADOT and, if granted, would shorten the duration of construction and associated impacts. Please also refer to Response 3-5 in regards to haul routes and acquisition of associated permits.

## 2.2.6 Letter 6: Gabrieleño Band of Mission Indians/Kizh Tribe of Los Angeles

Andy Salas - Gabrieleño Tribe.txt  
From: andysalas [gabrielenoindians@yahoo.com]  
Sent: Friday, April 06, 2012 12:53 PM  
To: Scattergood-Olympic  
Subject: Fw: Scattergood-Olympic Transmission line Project(SCH#2009091085)

Sent from my BlackBerry® by Boost Mobile

-----Original Message-----

From: "andysalas" <gabrielenoindians@yahoo.com>  
Date: Fri, 6 Apr 2012 19:50:27  
To: <scattergood-olympic@ladwp.com>; Christina Swindall<christinaswindall@yahoo.com>  
Reply-To: gabrielenoindians@yahoo.com  
Subject: Scattergood-Olympic Transmission line Project(SCH#2009091085)

Dear Charles C. Holloway ,

6-1 This email is in response to your letter dated March 19, 2012 in regards to the above subject project. The proposed project is within a highly culturally sensitive area and in order to protect our resources we're requesting one of our experienced & certified Native American monitors to be on site during all ground disturbances. In all cases, when the NAHC states there are "no records of sacred sites" in the subject area; they always refer the contractors back to the Native American Tribes whose tribal territory the project area is in. This is due to the fact, that the NAHC is only aware of general information on each California NA Tribe they are NOT the "experts" on our Tribe. Our Elder Committee & Tribal Historians are the experts and is the reason why the NAHC will always refer contractors to the local tribes. Please contact our office regarding this project to coordinate a NA monitor to be present.

Sincerely,  
Andy Salas  
Chairman Of The Gabrieleño Band Of Mission Indians/Kizh Tribe Of the Los Angeles Basin

Sent from my BlackBerry® by Boost Mobile

## **Response 6-1**

As stated on page 4-63 of the Draft EIR, “a number of historical resources have been recorded within the Ballona Creek and Wetlands area, some of which are known to contain human remains and associated grave goods. Although the area has been disturbed by development...the potential for intact archaeological resources and cultural material remains high.” Furthermore, page 4-64 of the Draft EIR provides discussion regarding recorded prehistoric village sites and other potential historical resources in proximity to the proposed route that may be of interest to Native Americans, which the Native American Heritage Commission (NAHC) identified as Sacred Lands. On page 4-65, the Draft EIR continues the discussion regarding recorded archaeological sites and a prehistoric village containing human interments and associated artifacts.

As discussed on pages 4-57 of the Draft EIR, in addition to contacting the NAHC, nine Native American contacts were also informed about the Project.

As discussed on pages 4-64 through 4-65 of the Draft EIR, during the reconnaissance survey, no surface evidence of historical resources was identified along the proposed alignment, because the Project corridor consists of existing paved roadways. However, there is a “possibility of intact subsurface cultural material associated with these resources beneath the pavement. During construction-related ground-disturbing activities, there is a potential for artifacts to be discovered.”

Finally, and as described on page 4-65 of the Draft EIR, the proposed underground transmission line would be in the proximity of previously recorded historical resources and potential unique archaeological resources, including resources with human remains and associated grave goods. Therefore, to minimize potential impacts to these resources, Mitigation Measures CUL-1 through CUL-3 would be implemented. Mitigation Measure CUL-1 requires monitoring by a qualified archaeologist during trenching and other ground-disturbing activities when that disturbance occurs in native soil. Areas that would be monitored are: Vista Del Mar from Imperial Highway to Sandpiper Street; Sandpiper Street; West Westchester Parkway between Pershing Drive and Stanmoor Drive; Lincoln Boulevard between 83<sup>rd</sup> Street and Culver Boulevard; and Culver Boulevard between Lincoln Boulevard and Centinela Avenue. Mitigation Measure CUL-2 states that “Native American monitors shall observe construction-related ground disturbance in native soil within the areas along the Project route specified in Mitigation Measure CUL-1.” Furthermore, and prior to initiation of ground-disturbing activities, Mitigation Measure CUL-3 requires training of construction personnel regarding possible subsurface cultural resources and protection of all cultural resources during construction.

With regard to implementation of Mitigation Measure CUL-2, LADWP will contact the Gabrieleño Band of Mission Indians/Kizh Tribe in advance of Project construction to coordinate retention of a Native American monitor during ground disturbing activities at the above-specified areas along the proposed Project route when native soil is anticipated to be affected.

## 2.2.7 Letter 7: Del Rey Residents Association



Post Office Box 661450 – Los Angeles, CA 90066  
[www.delreyhome.org](http://www.delreyhome.org)

May 7, 2012

VIA EMAIL AND U.S.P.S.  
Scattergood-Olympic Transmission Line Project  
Los Angeles Department of Water and Power  
Attn: Julie Van Wagner  
Environmental Project Manager  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Re: Draft Environmental Impact Report for the Scattergood-Olympic  
Transmission Line Project (SCH#2009091085)

Ladies and Gentlemen:

7-1 | At least 2.2 miles of the 11.4 mile line will be in Del Rey -- on Lincoln Blvd.  
| between Jefferson Blvd. and Culver Blvd.; then across the heart of Del Rey on  
| Culver Blvd. to the Los Angeles Police Department's Pacific Division  
| Headquarters; then north on Centinela Avenue through Del Rey's primary  
| commercial district to Washington Blvd. The proposed route will have a huge  
| impact on the Del Rey community and we feel that the Project needs to pay more  
| attention to these following areas of concern.

7-2 | **1) STREET IMPROVEMENTS:** The EIR recognizes (Section 5.1) that even after  
| mitigation measures, there will be "significant and unavoidable adverse impacts"  
| during construction of the project related to noise generation and traffic. As  
| compensation for the inability to mitigate the impacts, we believe that the Project  
| must be required to provide the following much needed improvements along the  
| project route:

**a. Move Existing Utilities Underground** - (Location: Centinela Ave.  
between Washington Blvd. and Culver Blvd.) Since the street will be torn up  
as part of this project, it is an ideal opportunity to do what should have been  
done when the City of Los Angeles widened Centinela Avenue in 2006-2007.  
The current poles and wires are an eyesore and are squeezed onto an  
already undersized sidewalk along the eastern side of the street. Existing  
electrical distribution lines and telecommunications wires should be relocated  
to the underground conduits being installed in this project.

Scattergood-Olympic Transmission Line Project  
Draft EIR of March 2012  
(SCH#2009091085)  
May 7, 2012  
Page 2

7-2  
cont.

**b. Repave Entire Street** – (Location: Entire project route) The EIR erroneously excludes aesthetic impact since it is underground and would not “degrade the existing visual character or quality of the site and its surroundings” (Section 4.1.2). However, the process of repaving only the excavated trenches and vault areas would leave the streets with a visually scarred, uneven and non-uniform surface that would cause the roadways to look and perform at a degraded level.

**c. Provide New Crosswalk** – (Intersection of Centinela Ave. and Louise Ave.) This is a very dangerous intersection as there is no traffic control for nearly half a mile along this part of Centinela and traffic is known to move very quickly here at times.

**d. Landscaping** – (Location: Centinela Ave. from Culver to Washington) Associated with the process of undergrounding the utilities and removing the power poles along Centinela Ave., there needs to be a program for installing new street trees and for maintaining the existing street trees that are in a neglected state.

7-3

**2) PROJECT SCHEDULING:** The traffic study (Section 4.2.7) in the EIR rates the existing operation (based on volume to capacity ratio) of Centinela from Washington to Culver as 'Poor' (a grade 'F' on a scale of A to F). It will be degraded to an even worse 'F' during construction. The Los Angeles Department of Water & Power must manage the construction process in order to reduce the project duration and to minimize disruption to traffic flow.

**a. Management And Accountability** - The widening project in 2006/2007 was completed a year behind schedule, in large part because of the needs of the utility companies. The EIR lays out the construction duration for each segment of the project (Section 2.3.2). Prior to the start of construction, we want the DWP to publish a construction schedule and be penalized if the work gets behind.

**b. Work Force and Work Hours** - The project duration (as described in Section 2.3.2) can be shortened by adding crews and increasing the work force, however construction and traffic disruption should not occur during, or anytime near, rush hours. In order to reduce the duration of the project and minimize traffic disruption, certain construction activities (preferably quieter activities such as Conduit Bank installation, backfilling, cable installations and testing) may need to occur at night. However, with the increased speed of the project, the duration of the noise disturbances at any given location would be shorter term.



Scattergood-Olympic Transmission Line Project  
Draft EIR of March 2012  
(SCH#2009091085)  
May 7, 2012  
Page 3

7-4 | **c. Coordination With Other Street Work Projects** – Section 6.1 describes how coordination with other public agencies has taken place in the process of producing the EIR. However, nothing requires that coordination continue to occur with other agencies and utility companies that often conduct street work. We want the DWP to be required to work together with the other utility and telecommunications companies to avoid traffic bottlenecks during construction of this line. When the DWP’s representative attended our General Meeting on March 29, 2012, there were public construction projects and traffic snarls on all of our major streets – Jefferson Blvd., Inglewood Blvd., Culver Blvd. and Centinela Ave. The companies know when they are planning to work. They should coordinate amongst themselves and with the large private developers (Playa Vista Phase II, Dinerstein Companies, etc.) so as to minimize the noise, dirt, vibrations and unsafe traffic conditions that will exist during construction. If necessary, a “traffic czar” should be appointed and given the job of ensuring coordination.

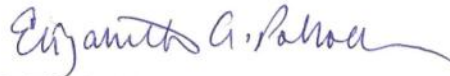
7-5 | **3) ALTERNATIVE PROJECT ROUTING:** While we understand that alternative project routes were studied and eliminated in the EIR (Section 3.5), it does not seem wise to have both of the main power lines for West Los Angeles running along the same route. One major earthquake along the Lincoln Blvd. fault could wipe out power to all of West Los Angeles for a very long time.

7-6 | Last week, the Del Rey community held a visioning workshop that focused on the possible future and planning of Centinela Ave. There was a great deal of productive input. Almost unanimously, the participants believe that Centinela Ave. needs to be made safer and more appealing for pedestrians. This project presents a great opportunity for this process to begin. The formal report detailing the results of the workshop will be made available soon. We would like them to be taken into consideration in the planning and construction of the Scattergood-Olympic Transmission Line Project.

This letter was voted on and approved by our board of directors on Sunday, May 6, 2012

Very truly yours,

DEL REY RESIDENTS ASSOCIATION



By Elizabeth A. Pollock, President

### **Response 7-1**

This comment presents introductory remarks and does not address specific issues or concerns related to the adequacy of the environmental impact analysis in the Draft EIR. No response is necessary.

### **Response 7-2**

The proposed Project's objectives are to: enhance reliability and improve flexibility of the Scattergood Transmission System; better utilize the energy produced from the SGS; and comply with federally mandated standards (refer to pages ES-1 and 1-3 of the Draft EIR). The suggested street improvements (i.e., undergrounding existing overhead utilities and telecommunication lines; repaving the entire street; providing a new crosswalk; and landscaping) would not meet the Project objectives or minimize any of the significant impacts identified in the EIR, and are beyond the scope of the proposed Project.

Undergrounding of the existing lower-voltage distribution lines would require the construction of a separate duct bank from the proposed Project, which would lengthen the duration of construction and increase the area of impact.

Repaving the excavated trenches and vault areas would not result in impacts to aesthetic and visual resources pursuant to CEQA Guidelines, Appendix G (Environmental Checklist), which defines significant impacts as adverse effects on scenic vistas, substantial damage to scenic resources, degradation of existing visual character, and sources of substantial light or glare. Repaving of affected streets along the proposed Project alignment would be coordinated with the pertinent affected jurisdictions (i.e., City of Los Angeles and City of Culver City) and pursuant to their respective requirements for repaving of streets associated with Project construction. In addition, repaving of the entirety of streets, as opposed to only the area of the street directly affected as a result of trench and maintenance vault construction, would increase the duration of Project construction and therefore the duration of significant impacts (i.e., traffic and noise).

Installation of a new crosswalk at the intersection of Centinela Avenue and Louise Avenue is beyond the scope of the proposed Project. In addition, upon completion of construction, operation of the proposed 230 kV underground transmission line would not generate additional traffic. Therefore, installation of a new crosswalk at the intersection of Centinela Avenue and Louise Avenue is not warranted in relation to the operation of the proposed Project.

The comment states that a program for installing new street trees and for maintaining existing street trees that are in a neglected state needs to be implemented as part of the proposed Project "from Culver to Washington." Implementation of a program to install new street trees and maintain existing street trees is beyond LADWP's purview and the scope of the proposed Project.

### **Response 7-3**

As discussed on pages 2-9 and 2-10 of the Draft EIR, LADWP would apply for a variance to the City of Los Angeles Rush Hour Ordinance for in-street construction that would allow for construction to occur outside of the hours of 9:00 a.m. through 3:30 p.m. The variance would reduce the construction time from 36 months to 18 to 24 months. LADWP would also coordinate the construction schedule for the proposed Project with affected jurisdictions (i.e., cities of Los Angeles and Culver City). In some instances, a variance to the rush hour ordinance may not be feasible and construction would occur over a longer duration.

The underground transmission line construction schedule was established by estimating the time and anticipated resources required for each construction phase of the Project, as well as consideration of noise ordinances and pertinent local traffic directives. As described in the Draft EIR, pages 2-6 through 2-10, separate crews would construct the various phases of the Project (e.g., trenching, duct bank installation, cable splicing) along multiple segments of the length of the transmission line alignment concurrently. These crews may be working on the same street or different streets simultaneously. Each construction phase of the Project would require a given amount of time and some phases must be completed prior to commencement of others; therefore, the additional crews may not shorten the construction duration. For example, trenching and duct bank installation, which require the longest construction duration, must be completed prior cable installation. The conduits would also be encased in concrete, which would require additional time for the concrete to set into place.

The extended construction hours (7:00 a.m. to 9:00 a.m. and 3:30 p.m. to 5:00 p.m.) would allow LADWP to conduct various phases of the underground transmission line construction, such as trenching, duct bank installation, and pouring of concrete, within a shorter amount of time. The evening hours would allow the concrete to set into place. Construction would move along the proposed alignment at a much faster pace. Shorter construction hours would require additional days to accomplish the same task, which would impact traffic in those locations for a longer duration. Additionally, some phases of the Project, such as maintenance vault installation, may require a construction duration longer than 6.5 hours, which would extend past the non-rush hour times of 9:00 a.m. to 3:30 p.m.

As discussed in Chapter 4 (Environmental Setting and Impacts), Section 4.2.6 (Noise) of the Draft EIR, within the City of Los Angeles, the maximum acceptable outdoor noise exposure level for residential, hospital, and school zones is 65 dBA (an A-weighted decibel scale) Community Noise Equivalent Level. To account for increased sensitivity of nearby receptors during the quieter nighttime hours, 5 dBA is added to measured noise levels between the hours of 7:00 p.m. and 10:00 p.m., and 10 dBA is added between the hours of 10:00 p.m. and 7:00 a.m. In addition, the City of Los Angeles prohibits construction or noise-generating activities between the hours of 9:00 p.m. and 7:00 a.m. At areas along the proposed route where adjacent land consists of non-residential development (e.g., industrial development or vacant land), construction hours may be extended to 9:00 p.m. The City of Culver City prohibits construction activity from 8:00 p.m. to 8:00 a.m.

On page 2-11 of the Draft EIR, Table 2.3-3 (Equipment Required for Construction Activity) lists the equipment required for each construction activity. As illustrated in the table, heavy equipment that would generate excessive construction noise would be required for the conduit bank installation, backfilling, and cable installation. The perception of construction noise levels during nighttime hours would result in a significant impact to nearby residences.

LADWP would, to the extent permitted by local rules and ordinances, expedite Project construction as a means to minimize impacts.

Refer to Response 4-14 above regarding notification of construction scheduling activities to the general public and affected jurisdictions. With regard to implementing penalties for delayed construction, LADWP may implement, if it chooses to do so, penalties to a contractor if construction is delayed; however, no such decision has been made at this time.

### **Response 7-4**

As further discussed in Response 4-2 above, prior to construction all affected jurisdictions would be contacted and consulted in regarding the preparation of the TMP; those jurisdictions would ultimately need to approve the TMP in order for Project construction to commence. Preparation and agency approval of TMP would account for separate, unrelated nearby or adjacent planned projects whose respective



construction schedule may coincide with that of the proposed Project's; doing so would provide for a coordinated management of traffic control taking into account potential overlapping project construction schedules. In addition, affected jurisdictions would also need to approve the Project and issue permits for construction within the streets [refer to Table 1.7-1 (Authorizations, Permits, and Approvals) of the Draft EIR].

Prior to construction, residents and businesses in the area would be notified of the Project construction time and duration. These notifications would also provide a contact for reporting any issues regarding Project-related construction. Additionally, LADWP would coordinate with the pertinent jurisdictions and their representatives (e.g., Council District 11 Traffic Committee) regarding public notification of construction for the proposed Project.

### **Response 7-5**

As described on pages 3-5 and 3-6 of the Draft EIR, numerous criteria were utilized for identification of potential routing alignments for the proposed Project. The criteria include: reliability; maximum use of existing roadways; land use considerations; minimization of conflicts with existing subsurface utilities; constructability; minimization of construction duration; and street width. Taking into account the siting criteria and public input, various preliminary potential alignment links were identified and considered.

As stated on page 4-70 of the Draft EIR, "the ground surface in the vicinity of the proposed alignment is not transected by known active or potentially active faults...the proposed alignment is not located within an Earthquake Fault Zone." Therefore, and as discussed on pages 4-71 and 4-72 of the Draft EIR, the potential for impacts related to surface fault ruptures or earthquakes is considered to be less than significant. Nonetheless, the proposed Project would be engineered in accordance with pertinent standards to withstand seismic events. In that regard, in the event of an earthquake it is reasonable to assume that earthshaking would be relatively widespread and not limited to the proposed alignment.

### **Response 7-6**

This comment does not address specific issues or concerns related to the adequacy of the environmental impact analysis in the Draft EIR. No response is necessary.

## 2.2.8 Letter 8: Bill Pope

*Bill Pope*  
**3277 Inglewood Boulevard**  
**Los Angeles, CA 90066**  
*Bill.Pope1@verizon.net*  
**310.391.3887**

Date: March 26, 2012

To: Scattergood-Olympic Transmission Line Project  
Los Angeles Department of Water and Power  
Attn: Julie Van Wagner,  
Environmental Project manager  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Subject: Cut-thru Traffic resulting from Scattergood-Olympic Transmission Line Project (SCH #2009091085)

While I am pleased that the Los Angeles Department of Water and Power (LADWP) has chosen to route the proposed Scattergood-Olympic power transmission line on the major highway of Centinela Avenue-Bundy Drive rather than on my narrow residential street of Inglewood Boulevard between National and Venice Boulevards, and while I understand that this project will "create significant and unavoidable impacts related to noise and traffic during construction" on Centinela Avenue-Bundy Drive as stated in Environmental Impact Report potentially causing Centinela-Bundy highway traffic to divert to my residential street, I am concerned that, once learned, such "Cut-thru" traffic will continue using my residential street as a short cut after construction is completed.

Therefore, I ask the Los Angeles Department of Water and Power to commit to the following plan of action:

8-1

1. Conduct a 24-hour traffic count study for seven days of both the northbound and southbound traffic currently using the segments of 1) Inglewood Boulevard between Venice and Palms Boulevards, and 2) between Palms and National Boulevards before construction begins. This study should be conducted while all schools in the vicinity are in regular session and not during any holidays.
2. Conduct an identical study during construction of the proposed transmission line along Centinela Avenue-Bundy Drive between Culver Boulevard and Olympic Boulevard to measure the amount of traffic which cuts through my residential neighborhood on Inglewood Boulevard rather than use a major or secondary highway other than Centinela-Bundy.
3. Conduct an identical study three months after construction of the proposed transmission line has been completed along all portions of Centinela Avenue-Bundy Drive between Culver Boulevard and Olympic Boulevard.
4. If traffic counts taken in the post-construction study show that traffic levels are more than pre-construction levels by more than the expected "annual ambient increase" of 1.5% per year (prorated for the period of construction along Centinela-Bundy), DWP will install traffic volume control measures acceptable to residents of Inglewood Boulevard between Venice and National Boulevards which will return traffic volumes to their pre-construction levels plus the expected ambient increases of 1.5% per year adjusted for the period of construction on Centinela-Bundy.

Will LADWP commit to this plan of action?

Sincerely,



Bill Pope

## **Response 8-1**

Pages 4-95 through 4-100 of the Draft EIR describe the methodology and roadway segments analyzed to assess traffic-related impacts during Project construction along the roadways that make up the proposed routing alignment. Existing (2011) traffic conditions, upon which the future with- and without-Project impact assessment was based, were established consistent with CEQA Guidelines Section 15125 regarding establishment of the baseline (existing) conditions. Furthermore, and as described on pages 4-93 and 4-110 of the Draft EIR, the assessment regarding traffic-related impacts anticipated during Project construction also accounted for recent CEQA case law (i.e., *Sunnyvale West Neighborhood Assn. v. City of Sunnyvale City Council*, 190 Cal.App.4th 1351 [2010]). Therefore, the methodology and scope of the traffic impact assessment as included in the Draft EIR is consistent with the pertinent requirements of CEQA and associated case law. As detailed in the Draft EIR, construction of the proposed Project would result in significant, yet temporary, unavoidable impacts to traffic. However, and as stated on page 4-117 of the Draft EIR, “[a]fter completion of construction, operation of the proposed 230 kV underground transmission line would not generate additional traffic; therefore, the Project would not result in permanent impacts to traffic.”

It is acknowledged, on page 4-117 of the Draft EIR, that detours may be required during construction of the proposed Project. Detours, if needed during Project construction, would be addressed through implementation of a Traffic Management Plan (TMP) (refer to Mitigation Measure TR-1 on page 4-119 of the Draft EIR). The TMP, prepared in coordination with the City of Los Angeles, Culver City, and Caltrans, as applicable, would define the sequence of construction operations and the measures that would be used to control the flow of traffic (e.g., use of flag persons, warning and wayfinding signs, lights, barricades, cones). Implementation of Mitigation Measure TR-1 would, to the extent possible, minimize traffic-related impacts during Project construction.

The commenter expresses concern regarding “cut-thru” traffic that might remain on Inglewood Boulevard after Project construction. As described above, the traffic impact assessment as included in the Draft EIR was performed consistent with the pertinent guidelines set forth in CEQA and associated case law, as well as local (e.g., Los Angeles County Congestion Management) guidelines. Per Section 15064(d) of the CEQA Guidelines, the Lead Agency (in this case, LADWP) shall, in evaluating the significance of the environmental effect of a project, consider direct physical changes in the environment that may be caused by the project and reasonably foreseeable indirect physical changes that may be caused by the project. An indirect physical change is to be considered only if that change is a reasonably foreseeable impact that may be caused by the project. A change that is speculative or unlikely to occur is not reasonably foreseeable. Because it cannot be reasonably determined that the traveling public will continue to use certain streets as short-cut routes after construction of the proposed Project, post-construction traffic counts or studies on Inglewood Boulevard are not warranted.

## 2.2.9 Letter 9: Don Siro

Date: March 26, 2012

To: Scattergood-Olympic Transmission Line Project  
Los Angeles Department of Water and Power  
Attn: Julie Van Wagner,  
Environmental Project manager  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Subject: Cut-thru Traffic resulting from Scattergood-Olympic Transmission Line Project (SCH #2009091085)

While I am pleased that the Los Angeles Department of Water and Power (LADWP) has chosen to route the proposed Scattergood-Olympic power transmission line on the major highway of Centinela Avenue-Bundy Drive rather than on my narrow residential street of Inglewood Boulevard between National and Venice Boulevards, and while I understand that this project will "create significant and unavoidable impacts related to noise and traffic during construction" on Centinela Avenue-Bundy Drive as stated in Environmental Impact Report potentially causing Centinela-Bundy highway traffic to divert to my residential street, I am concerned that, once learned, such "Cut-thru" traffic will continue using my residential street as a short cut after construction is completed.

Therefore, I ask the Los Angeles Department of Water and Power to commit to the following plan of action:

9-1

1. Conduct a 24-hour traffic count study for seven days of both the northbound and southbound traffic currently using the segments of 1) Inglewood Boulevard between Venice and Palms Boulevards, and 2) between Palms and National Boulevards before construction begins. This study should be conducted while all schools in the vicinity are in regular session and not during any holidays.
2. Conduct an identical study during construction of the proposed transmission line along Centinela Avenue-Bundy Drive between Culver Boulevard and Olympic Boulevard to measure the amount of traffic which cuts through my residential neighborhood on Inglewood Boulevard rather than use a major or secondary highway other than Centinela-Bundy.
3. Conduct an identical study three months after construction of the proposed transmission line has been completed along all portions of Centinela Avenue-Bundy Drive between Culver Boulevard and Olympic Boulevard.
4. If traffic counts taken in the post-construction study show that traffic levels are more than pre-construction levels by more than the expected "annual ambient increase" of 1.5% per year (prorated for the period of construction along Centinela-Bundy), DWP will install traffic volume control measures acceptable to residents of Inglewood Boulevard between Venice and National Boulevards which will return traffic volumes to their pre-construction levels plus the expected ambient increases of 1.5% per year adjusted for the period of construction on Centinela-Bundy.

Will LADWP commit to this plan of action?

Sincerely,  
Don Siro  
3042 Inglewood Boulevard  
Los Angeles, CA 90066

**Response 9-1**

The text of the letter is identical to Comment Letter 8. Please refer to Response 8-1

## 2.2.10 Letter 10: Derek Davis

Page 1 of 1

**From:** Derek Davis [DDAVIS@TEAC.COM]  
**Sent:** Tuesday, March 27, 2012 8:14 PM  
**To:** Scattergood-Olympic  
**Subject:** Attn: Julie Van Wagner, Environmental Project Manager  
**Date:** March 26, 2012

**To:** Scattergood-Olympic Transmission Line Project  
Los Angeles Department of Water and Power  
Attn: Julie Van Wagner, Environmental Project Manager  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

**Subject:** Cut-thru Traffic resulting from Scattergood-Olympic Transmission Line Project (SCH #2009091085) onto Inglewood Boulevard

Dear Ms. Van Wagner:

I am a home owner on Inglewood Boulevard in Mar Vista.

I am pleased that the Los Angeles Department of Water and Power (LADWP) has chosen to route the proposed Scattergood-Olympic power transmission line on the major thoroughfare of Centinela Avenue-Bundy Drive rather than on my residential street of Inglewood Boulevard between National and Venice Boulevards. This project will "create significant and unavoidable impacts related to noise and traffic during construction" on Centinela Avenue-Bundy Drive as stated in Environmental Impact Report potentially causing traffic to divert to my residential street. I am concerned that "Cut-thru" traffic will continue using my residential street as a short cut after construction is completed. Inglewood Boulevard is a residential street with children going to school, bicycles, skateboards, joggers, people walking their pets, etc. It is critical that we keep the residential nature of Inglewood Boulevard to protect the citizens and the neighborhood.

I respectfully request that the Los Angeles Department of Water and Power commit to a plan of action to ensure that Inglewood Boulevard returns to a quiet residential street after construction has been completed. I suggest:

1. Conduct a 24-hour traffic count study for seven days of the northbound and southbound traffic using 1) Inglewood Boulevard between Venice and Palms Boulevards, and 2) between Palms and National Boulevards before construction begins. This study should be conducted while all schools in the vicinity are in regular session and not during any holidays.
2. Conduct an identical study during construction to measure the amount of traffic which cuts through Inglewood Boulevard.
3. Conduct an identical study three months after construction has been completed.
4. If traffic counts taken in the post-construction study show that traffic levels more than pre-construction levels, DWP will install traffic volume control measures acceptable to residents of Inglewood Boulevard between Venice and National Boulevards to return traffic volumes to their pre-construction levels plus the expected ambient increases of 1.5% per year.

Thank you for protecting our neighborhood and life style.

Sincerely,

Derek Davis  
3560 Inglewood Boulevard  
Los Angeles, CA 90066

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**Response 10-1**

Please refer to Response 8-1.

## 2.2.11 Letter 11: Renato and Kimberly Basile

**Renato & Kimberly Basile**  
3556 Inglewood Blvd.  
Los Angeles, CA 90066  
(310) 390-2868

March 27, 2012

Scattergood-Olympic Transmission Line Project  
Los Angeles Department of Water and Power  
Attn: Julie Van Wagner,  
Environmental Project manager  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Subject: Cut-thru Traffic resulting from Scattergood-Olympic Transmission Line Project (SCH #2009091085)

Dear Julie;

11-1 As I could sit here and copy and paste most of the letter that is being sent to you, I have to add my own feelings to what will happen. You see, I am a father of two kids, ages 6 and 8, and with the notion that we live on what is called a boulevard and up until two years ago there were no speed bumps on our street. Those speed bumps were put there for a reason and that reason was to slow down traffic and make people use the main roads to cross town. Now, not only have all our cars been side swiped several times, you can't imagine the amount of debris that has dropped from passing vehicles bouncing from the speed bumps. Try backing out your driveway in the morning on our street; No one gives you any sort of courtesy and have even driven up the sidewalks to get around us. (We have no curbs on our street.). So, add double or triple the amount of cars and with the stop signs, speed bumps and extra cars we might as well move during the construction of the power line install. We have had several bouts of congestion in the past several years so we know what it will be like: The 405 closure when the motor office got struck by a car; the tractor trailer truck on the 405 that crossed the divider and blocked all of the freeway lanes; the Culver police officer struck by the wrong way driver ( the officer was a family friend of mine).

Compound one day into several days or weeks. Our lives are going to be a full nightmare. With just my simple note to you, you can understand why you have to help us out.

11-2 While I am pleased that the Los Angeles Department of Water and Power (LADWP) has chosen to route the proposed Scattergood-Olympic power transmission line on the major highway of Centinela Avenue-Bundy Drive rather than on my narrow residential street of Inglewood Boulevard between National and Venice Boulevards, and while I understand that this project will "create significant and unavoidable impacts related to noise and traffic during construction" on Centinela Avenue-Bundy Drive as stated in Environmental Impact Report potentially causing Centinela-Bundy highway traffic to divert to my residential street, I am



concerned that, once learned, such "Cut-thru" traffic will continue using my residential street as a short cut after construction is completed.

Therefore, I ask the Los Angeles Department of Water and Power to commit to the following plan of action:

1. Conduct a 24-hour traffic count study for seven days of both the northbound and southbound traffic currently using the segments of 1) Inglewood Boulevard between Venice and Palms Boulevards, and 2) between Palms and National Boulevards before construction begins. This study should be conducted while all schools in the vicinity are in regular session and not during any holidays.

11-2  
Cont.

2. Conduct an identical study during construction of the proposed transmission line along Centinela Avenue-Bundy Drive between Culver Boulevard and Olympic Boulevard to measure the amount of traffic which cuts through my residential neighborhood on Inglewood Boulevard rather than use a major or secondary highway other than Centinela-Bundy.

3. Conduct an identical study three months after construction of the proposed transmission line has been completed along all portions of Centinela Avenue-Bundy Drive between Culver Boulevard and Olympic Boulevard.

4. If traffic counts taken in the post-construction study show that traffic levels are more than pre-construction levels by more than the expected "annual ambient increase" of 1.5% per year (prorated for the period of construction along Centinela-Bundy), DWP will install traffic volume control measures acceptable to residents of Inglewood Boulevard between Venice and National Boulevards which will return traffic volumes to their pre-construction levels plus the expected ambient increases of 1.5% per year adjusted for the period of construction on Centinela-Bundy.

Will LADWP commit to this plan of action and see to it that our lives are not made miserable?

Sincerely



Renato Basile

### **Response 11-1**

The comment presents concerns regarding traffic safety and congestion related to construction of the proposed Project. As described in Response 8-1 above, the Draft EIR evaluated traffic-related impacts anticipated to occur during construction of the proposed Project utilizing criteria and methods in accordance with pertinent CEQA and local guidelines. Traffic-related impacts associated with construction of the proposed Project are discussed on pages 4-106 through 4-119 of the Draft EIR. To minimize impacts, Mitigation Measure TR-1 would be implemented to ensure that appropriate methods to control traffic and maintain traffic safety are implemented during Project construction. Please refer to Response 4-2 for more discussion regarding preparation, coordination, and implementation of the TMP.

### **Response 11-2**

**Response 11-2:** Please refer to Response 8-1.

## 2.2.12 Letter 12: Dorothy Garven

*Dorothy Garven*  
3630 Inglewood Blvd.  
Los Angeles, CA 90066

March 27, 2012

Scattergood-Olympic Transmission Line Project  
Los Angeles Department of Water and Power  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Attn: Julie Van Wagner, Environmental Project Manager

RE: Cut-thru Traffic resulting from Scattergood-Olympic Transmission Line Project  
(SCH#2009091085)

Dear Sir or Madam:

I am pleased that LADWP has decided to route the Scattergood-Olympic power line on Centinela rather than on our narrow Inglewood Blvd. However, since traffic will probably be diverted during construction to Inglewood Blvd., I am concerned that once motorists "learn" of this route and become accustomed to it, that the traffic will continue using Inglewood Blvd. after the power line is complete.

Therefore, I suggest that LADWP consider the following action:

- 12-1
- 1) Conduct a 24-hour traffic count study for seven days of both the northbound and southbound traffic currently using the segments of (a) Inglewood Boulevard between Venice and Palms Blvd., and (b) between Palms and National Boulevards before construction begins. This study should be conducted while all schools in the vicinity are in regular session and not during any holidays.
  - 2) Conduct an identical study during construction of the transmission line along Centinela Avenue-Bundy Drive between Culver Boulevard and Olympic Boulevard to measure the amount of traffic which cuts through my residential neighborhood on Inglewood Blvd. rather than use a major or secondary highway other than Centinela-Bundy.
  - 3) Conduct an identical study three months after construction has been completed along all portions of Centinela Avenue-Bundy Drive between Culver Boulevard and Olympic Boulevard.
  - 4) If traffic counts taken in the post-construction study show that traffic levels are more than pre-construction levels by more than the expected "annual ambient increase" of 1.5% per year (prorated for the period of construction along Centinela-Bundy), DWP will install traffic volume control measures acceptable to residents of Inglewood Blvd. between Venice and National Blvds. which will return traffic volumes to their pre-construction levels plus the expected ambient increases of 1.5% per year adjusted for the period of construction on Centinela-Bundy.

I strongly urge your commitment to this plan.

Sincerely,

*Dorothy Garven*  
Dorothy Garven

L1132.LADWP

**Response 12-1**

Please refer to Response 8-1.

### 2.2.13 Letter 13: Christopher McKinnon

#### COMMENT FORM

The City of Los Angeles Department of Water and Power (LADWP) thanks you for your interest in the Scattergood-Olympic Transmission Line Project. Public Meetings are being conducted to share information regarding the Draft Environmental Impact Report (Draft EIR) for the proposed project.

The project team welcomes comments and involvement throughout the project and appreciates your feedback. Comments regarding the adequacy of the Draft EIR must be submitted by **May 7, 2012**. Please submit this comment form in the comment box during tonight's Public Meeting, mail it to the address on the opposite side, or email your comments to [Scattergood-Olympic@ladwp.com](mailto:Scattergood-Olympic@ladwp.com).

NAME: Christopher McKinnon DATE: 7/11/12

AGENCY/ORGANIZATION: \_\_\_\_\_

ADDRESS: 11837 North Park Avenue

CITY/STATE/ ZIP: LA CA 90066

EMAIL (optional): \_\_\_\_\_

In the space below (continued on the other side), please provide comments regarding the adequacy of the Draft EIR.

13-1

I appreciate all the hard work in preparing the Draft EIR. I would reiterate not to use the Sepulveda or Sawtelle routing. Please use the Centinela routing.



**Response 13-1**

The commenter's support for the proposed Project is noted.

## **2.3 SUMMARY OF ORAL COMMENTS RECEIVED AT THE PUBLIC MEETINGS AND RESPONSES**

Table 2-2 summarizes the oral comments received during the Draft EIR public meetings held on April 11 and 12, 2012. The comments and questions are categorized by EIR topic and the responses are located in the column to the right.

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**Table 2-2. Oral Comments from the Draft EIR Public Meetings**

PUBLIC COMMENT/QUESTION AND EIR TOPIC	PUBLIC RESPONSE (PR)
<b>Project Description/Construction Methodology</b>	
Can the underground transmission line be constructed during the evening hours?	<p><b>PR-1:</b> As discussed in Chapter 4 (Environmental Setting and Impacts), Section 4.2.6 (Noise) of the Draft EIR, the proposed Project would require the use of construction equipment that would generate noise levels in excess of local noise ordinances (approximately 89 dBA at a distance of 50 feet). Within the City of Los Angeles, the maximum acceptable outdoor noise exposure level for residential, hospital, and school zones is 65 dBA Community Noise Equivalent Level. To account for increased sensitivity of nearby receptors during the quieter nighttime hours, 5 dBA is added to measured noise levels between the hours of 7:00 p.m. and 10:00 p.m., and 10 dBA is added between the hours of 10:00 p.m. and 7:00 a.m. Perception of construction noise levels during nighttime hours would result in a greater impact to nearby residences. In addition, the City prohibits construction or noise-generating activities between the hours of 9:00 p.m. and 7:00 a.m. At areas along the proposed route where adjacent land consists of non-residential development (e.g., industrial development or vacant land), construction hours may be extended to 9:00 p.m. Culver City prohibits construction activity from 8:00 p.m. to 8:00 a.m.</p>
Will construction of the underground transmission line occur in segments or simultaneously?	<p><b>PR-2:</b> As described in the Draft EIR, pages 2-6 through 2-10, the underground transmission line would be constructed in approximately 40-foot long segments each day with a temporary construction corridor of approximately ten feet wide by 150 to 300 feet long. Construction of multiple segments along the length of the transmission line alignment would occur concurrently by up to 6 crews. Additional crews would construct other components of the Project (e.g., duct bank installation, cable pulling and splicing) either on the same street or different streets simultaneously.</p> <p>The duration of construction within each segment along the proposed route would depend on the construction activity phase and available resources. For example, it is anticipated that the construction of one mile of duct bank (the phase of installation with the longest construction duration) would take approximately one month to complete.</p>
How will the underground transmission line be constructed through major intersections, such as Centinela Avenue and Venice Boulevard? Will the intersection be closed?	<p><b>PR-3:</b> As described in the Draft EIR on page 2-118, "Project construction would require the closure of one to two travel lanes and may result in left-turn restrictions." However, two-way traffic at roadway intersections along the proposed route would be maintained, and only lanes used for installation of the transmission line in the open trench would be closed to traffic; no maintenance vaults would be located within intersections.</p> <p>As described on page 4-119 of the Draft EIR, Mitigation Measure TR-1 (Transportation Management Plans [TMPs]), a Traffic Management Plan (TMP) would be implemented to minimize traffic-related impacts during Project construction. The TMP would define the sequence of construction operations and the measures that would be used to control the flow of traffic (e.g., use of flag persons, warning signs, lights, barricades, cones) through each intersection and street segment.</p>
The intersection of Centinela Avenue and Venice Boulevard requires coordination with Caltrans, not just the City of Los Angeles Bureau of Engineering.	<p><b>PR-4:</b> As shown on page 1-9 of the Draft EIR, Table 1.7-1 (Authorizations, Permits, and Approvals), an encroachment permit for the construction, operation, and maintenance of the proposed Project would be obtained from Caltrans for areas of construction that occur across or within State highway rights-of-way.</p>

PUBLIC COMMENT/QUESTION AND EIR TOPIC	PUBLIC RESPONSE (PR)
<p>A request was made that prior to construction, the public be notified about construction time and duration, especially to the Council District 11 Traffic Committee.</p>	<p><b>PR-5:</b> Prior to construction, residents and businesses in the area would be notified of the Project construction time and duration. These notifications would also provide a contact for reporting any issues regarding Project-related construction. Additionally, LADWP would coordinate with the pertinent jurisdictions and their representatives (e.g., Council District 11 Traffic Committee) regarding public notification of construction for the proposed Project.</p>
<p>What happens to the existing line? Is it the same voltage?</p>	<p><b>PR-6:</b> On Page 1-2 of the Draft EIR, Figure 1.2.1 illustrates LADWP's existing Scattergood Transmission System with three existing transmission lines originating from the Scattergood Generating Station (SGS)—one 230 kV transmission line and two 138 kV transmission lines. The proposed 230 kV transmission line would parallel the existing 230 kV transmission line from the intersection of Lincoln Boulevard and Culver Boulevard to the intersection of Ocean Park Boulevard and Centinela Boulevard.</p> <p>As described on Page 1-3 of the Draft EIR, the objectives of the SOTLP are to enhance reliability and improve flexibility, better utilize energy produced at SGS, and comply with federally mandated standards. The addition of a second 230 kV transmission line from SGS to the Olympic Receiving Station would create a redundant path and increase reliability, allowing LADWP to transfer the maximum SGS output in a more sustainable manner. There are no plans to modify the existing 230 kV transmission line as part of the proposed Project. However, the new 230 kV transmission line would allow LADWP to redirect power and perform maintenance on the existing underground transmission line without disrupting service or limiting the SGS output. Necessary regular maintenance and repair, as needed, of the existing transmission line would continue to occur regardless of whether the proposed Project is approved or not.</p> <p>Some of the energy currently transmitted through the existing 230 kV transmission line would be redirected to the new transmission line. This would minimize stress on the aging existing line and allow repairs to the existing line without minimizing transmission of energy from the SGS to Olympic Receiving Station.</p>
<p>Can LADWP underground existing above-ground utilities as part of this Project?</p>	<p><b>PR-7:</b> There are a number of existing overhead transmission lines (110 kV and above) and distribution lines (below 110 kV) along the proposed 230 kV transmission line route; but LADWP does not own any of the existing overhead high voltage transmission lines. To underground the existing lower-voltage distribution lines would require a separate duct bank from the proposed 230 kV transmission line. This would increase the construction time, cost and impacts. In addition, undergrounding existing overhead utilities would not meet the Project objectives and is beyond the scope of this Project.</p>
<p>How was the schedule established, and is there any way to add more crews and speed up the construction process?</p>	<p><b>PR-8:</b> The underground transmission line construction schedule was established by estimating the time and anticipated resources required for each construction phase of the Project, as well as consideration of noise ordinances and local traffic directives. Several 40-foot segments along the transmission line route would be constructed concurrently; however, at each location, some construction phases must be completed prior to other phases. For example, trenching and installation of the duct bank must be completed prior to cable installation and cable splicing. The City of Los Angeles and Culver City noise ordinances limit construction hours and noise-generating activities (see response PR-1). It is anticipated that a variance to the City of Los Angeles Mayor's Directive #2 (refer to Page 4-94 of the Draft EIR), which prohibits rush hour construction by any City department or agency on major roads from 6:00 a.m. to 9:00 a.m. and 3:30 p.m. to 7:00 p.m., would be obtained for certain portions of the Project.</p>

PUBLIC COMMENT/QUESTION AND EIR TOPIC	PUBLIC RESPONSE (PR)
Is there coordination for repaving of roads?	<b>PR-9:</b> The City of Los Angeles Bureau of Street Services, Resurfacing Division, is responsible for pavement preservation on streets within the City of Los Angeles. LADWP does coordinate with and notify other City of Los Angeles Departments, such as the Bureau of Street Services, regarding major projects. However, the priority of projects and resources for the City's departments do not always coincide.
<b>Alternatives</b>	
If the proposed route could not be built for some reason, or something went wrong with it, would LADWP then need to further study the other two alternatives?	<b>PR-10:</b> As discussed in Chapter 3 (Alternatives), Section 3.2.2 (Project Alternatives Screening Methodology) of the Draft EIR, the development of routing alignments for the 230 kV transmission line considered several siting criteria and public input. The siting criteria included the following: engineering constructability; reliability; maximum use of existing roadways; land use consideration; conflicts with existing substructure utilities; constructability; construction duration; and street width. The same siting criteria was also utilized for the two alternative routes considered—Sawtelle Boulevard and Sepulveda Boulevard alternative routing alignments (refer to pages 3-16 through 3-23 of the Draft EIR for more detailed discussion regarding alternative routing alignments). This analysis determined that these routing alternatives would not avoid or minimize any of the significant temporary impacts that would occur as a result of the proposed Project, and they were therefore eliminated from full evaluation in the Draft EIR.
Support for the proposed route was provided.	<b>PR-11:</b> Comment noted.
Culver West Convalescent Hospital is not located on Centinela Avenue; it is located on Grand View Boulevard and doesn't even back up to Centinela Avenue.	<b>PR-12:</b> References to the Culver West Convalescent Hospital have been removed from the Draft EIR [Table 3.3-1 (Summary of Key Characteristics of the Proposed Routing Alignment) on Page 3-9, page 3-10, and Page 4-86] and revisions are included in Chapter 3 (Errata) of the Final EIR .
<b>Traffic</b>	
There is concern regarding traffic in the Project area. Residents have already experienced traffic impacts from the expansion of the 405 freeway.	<b>PR-13:</b> As stated in the Draft EIR on page 4-117, "even with the implementation of [Mitigation Measure] TR-1, impacts to traffic would be considered a significant but temporary impact." The TMP would define the sequence of construction operations and the measures that would be used to control the flow of traffic (e.g., use of flag persons, warning signs, lights, barricades, cones) through each intersection and street segment. In addition, and prior to construction, residents and businesses in the area would be notified of Project construction. After completion of construction, operation of the proposed 230 kV underground transmission line would not generate additional traffic; therefore the Project would not result in permanent impacts to traffic.

PUBLIC COMMENT/QUESTION AND EIR TOPIC	PUBLIC RESPONSE (PR)
The existing traffic along Centinela during morning and evening rush hour is dreadful.	<p><b>PR-14:</b> Pages 4-101 through 4-103 of the Draft EIR discuss the existing (2011) traffic volumes during the a.m. (between the hours of 7:00 a.m. and 9:00 a.m.) and p.m. (between the hours of 4:00 p.m. and 6:00 p.m.) peak hour periods and associated level of service (LOS) values along Centinela Avenue. Segments 5 through 8 are currently operating at LOS E and F during peak a.m. and p.m. hours.</p> <p>Construction of the proposed Project would result in temporary, significant impacts to traffic, but would not result in permanent traffic impacts after completion of construction. The construction of the proposed underground transmission line would require the closure of one to two traffic lanes. As discussed on Page 4-117 of the Draft EIR, "existing on-street parking would be utilized as traffic lanes to minimize traffic lane closures during construction... The provision of the original one-way capacity of the affected roadway (in number of travel lanes) in the peak direction, while providing a reduced number of travel lanes for the opposite direction of traffic flow, would help to alleviate any potential poor LOS conditions." Furthermore, and prior to construction, a Traffic Management Plan would be developed and approved by the City of Los Angeles Department of Transportation, and the City of Los Angeles Bureau of Engineering would issue a permit for construction within the public right-of-way. Even with the implementation of Mitigation Measure TR-1, impacts to traffic during construction would be considered significant but temporary.</p>
Blocked driveways are a concern.	<p><b>PR-15:</b> As stated on Page 4-115 of the Draft EIR, "mid-block driveway locations would likely be impacted during construction of the proposed Project, depending on the ultimate location of the transmission line... Consideration for maintained access to adjacent residential driveways, as feasible, would be incorporated into the construction planning process. During construction hours (Monday through Saturday from 7:00 a.m. to 5:00 p.m.), access along the Project route would be temporarily unavailable in some locations; however, trenches and maintenance vaults would be covered with steel plates every evening to allow access to adjacent driveways." In addition, and prior to construction, residents and businesses in the area would be notified of Project construction.</p>

PUBLIC COMMENT/QUESTION AND EIR TOPIC	PUBLIC RESPONSE (PR)
<b>Electric and Magnetic Fields</b>	
<p>Are there plans for mitigation of EMF, such as shielding?</p>	<p><b>PR-16:</b> As stated on page 4-133 in the Draft EIR, "Although not regulated by the CPUC [California Public Utilities Commission], LADWP follows their guidelines of allocating a minimum of four percent of the total Project cost for implementing EMF reduction measures with a goal of achieving magnetic field reduction of at least 15 percent. The methods utilized for this Project would exceed both the four percent allocation and the goal for a 15 percent reduction in magnetic field levels."</p> <p>EMF levels associated with the proposed Project have been reduced through duct bank design. More specifically, a triangular duct bank configuration would be utilized (as opposed to a horizontal duct bank configuration), and cables would be installed closer together and at a greater depth below ground.</p> <p>As discussed on Pages 4-129 through 4-133 of the Draft EIR, the highest calculated magnetic field levels would occur at the center of the triangular duct bank configuration—11.21 milliGauss (mG) for average loading conditions (187 Amps) and 45.0 mG for 95th percentile loading conditions (751 Amps). Alternatively, the highest calculated magnetic field levels at the center of the horizontal duct bank configuration are 26.08 for average loading conditions and 104.76 at 95th percentile loading. Magnetic field levels have been substantially reduced with the utilization of the triangular duct bank configuration; therefore, it was determined that other methods, such as shielding, would not be utilized.</p>
<b>Other</b>	
<p>More people attended the 2009 public meetings for the Project and the Council District 11 Ad-hoc committee negotiated with LADWP to address concerns of residents in the area. A majority of their requests were met.</p>	<p><b>PR-17:</b> Comment noted.</p>
<p>Commented that an EIR was not necessary and cost taxpayers an additional one million dollars.</p>	<p>Public comments from the IS/MND were considered, and it was determined that significant and unavoidable impacts could result from the construction of the proposed Project. Therefore, and in compliance with the California Environmental Quality Act (CEQA), an EIR was prepared to fully assess and disclose potentially significant impacts of the proposed Project and to identify ways to minimize and avoid potentially significant impacts.</p>

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## CHAPTER 3: ERRATA

### 3.1 INTRODUCTION

Text changes shown in this chapter include those made as a result of comments on the Draft EIR during the public review period. Specific responses to comments (see Chapter 2) direct readers to specific pages or ranges of pages in the Draft EIR. All changes made to the Draft EIR are indicated in ~~strikeout~~ (deletion) and underline (addition) text, as shown in the subsequent section. The changes to the Draft EIR shown in the section below do not affect the overall conclusions of the environmental analysis relative to the significance of impacts.

### 3.2 ERRATA

*The first paragraph on page 1-4 is revised as follows:*

The ~~North American Reliability Council~~ North American Electric Reliability Corporation (NERC) regulates the reliability of the electric power grid for North America.

*Table 1.7-1, Authorizations, Permits, and Approvals, is revised as follows:*

**Table 1.7-1. Authorizations, Permits, and Approvals**

Triggering Action	Permit/Approval	Accepting Authority/Approving Agency	Statutory Reference
<b>STATE OF CALIFORNIA</b>			
Proposed construction, operation, and maintenance may occur across or within California highway rights-of-way	Encroachment Permit	California Department of Transportation, Los Angeles County	California Vehicle Code, Division 1, Chapter 3; Division 2, Chapters 2.5 and 5.5; Division 6; Chapter 7; Division 13; Chapter 5; Division 14.1; Chapters 1 and 2; Divisions 14.8 and 15
Proposed construction may involve storm water discharges to surface waters of the State	General Discharge Permits for Storm Water Associated with Construction Activity, National Pollutant Discharge Eliminations System Stormwater Permit	State Water Resources Control Board – Los Angeles Regional Water Quality Control Board	Federal Clean Water Act, Section 402
<b>LOCAL</b>			
Proposed trenching and excavation within local roadway.	Excavation "U" Permit	City of Los Angeles Bureau of Engineering	
<u>Proposed construction, operation, and maintenance may occur within the city limits of the City of Culver City</u>	<u>Encroachment Permit</u>	<u>City of Culver City</u>	

*The first paragraph on page 4-86 is revised as follows:*

The proposed Project would be located primarily within the City of Los Angeles, adjacent to the County of Los Angeles, with approximately ~~430~~ 1,310 feet traversing Culver City. The primary noise sources in the Project area are traffic from highways and city streets, airplane noise, sounds emanating from neighborhoods (e.g., voices and radio and television broadcasts), and naturally occurring sounds (e.g., winds and wind-generated noises). Generally, intermittent, short-term noises do not significantly contribute to longer-term noise averages.

*The first paragraph on page 4-105 is revised as follows:*

Several public transit agencies service the Project area, including Metro, Santa Monica Big Blue Bus, Culver ~~City Bus~~ CityBus, and Commuter Express service.

*The second paragraph on page 4-105 is revised as follows:*

### **Culver ~~City Bus~~ CityBus**

The Culver ~~City Bus~~ CityBus services an area of ~~25.5~~ 40 square miles, which includes the communities of Venice, Westchester, Westwood, West Los Angeles, Palms, Marina Del Rey, ~~Ranch~~ Rancho Park, Mar Vista, Century City, and Culver City. The following routes are located in the Project area: 1 (Washington), ~~5 (Braddock), and 2 (Inglewood/Venice High School), 5 (Braddock), and 7 (Culver).~~

*The first sentence in the second to last paragraph on page 4-105 is revised as follows:*

~~Bicycle paths~~ Bikeways in the Los Angeles area fall into three classes:

*The last paragraph on page 4-105 is revised as follows:*

The Project area contains four Class I bicycle paths—the Ballona Creek, South Bay ~~Bike~~-Trail, Culver Boulevard, and Strand ~~bicycle~~ Bike Paths. The Ballona Creek ~~Bicycle~~ Bike Path is a six-mile-long path that parallels Ballona Creek. It starts at ~~Jefferson Boulevard~~ National Boulevard in Culver City and ends at the Strand in Playa Del Rey. The proposed Project would cross Ballona Creek ~~bicycle~~ Bike Path on Lincoln Boulevard. The Strand ~~bicycle~~ Bike Path is a 22-mile-long path that runs along the Pacific Ocean. It starts at Will Rogers State Beach in Pacific Palisades and ends at Torrance Beach in Torrance. In the Project area, it is located along Vista Del Mar. The South Bay ~~Bike~~-Trail is located along Vista Del Mar, and the Culver Boulevard ~~bicycle~~ Bike Path runs parallel to Culver Boulevard.

*The second to last full paragraph on page 4-115 is revised as follows:*

### **Culver ~~City Bus~~ CityBus**

- Line 1 – Potential impact at Washington Boulevard/Centinela Avenue
- Line 2 – Potential impact Centinela Avenue/Venice Boulevard
- Line 5 – Potential impact at along Centinela Avenue ~~from~~ to Culver Boulevard ~~and Centinela Avenue~~
- Line 7 – Potential impact on Culver Boulevard from Centinela Avenue to State Route 90.

*The second full paragraph on page 4-116 is revised as follows:*



The Project area contains four Class I bicycle paths—the Ballona Creek, South Bay ~~Bike~~-Trail, Culver Boulevard, and Strand ~~bicycle~~ Bike Paths. The Ballona Creek ~~Bicycle~~ Bike Path is a six-mile-long path that parallels Ballona Creek. It starts at ~~Jefferson Boulevard~~ National Boulevard in Culver City and ends at the Strand in Playa Del Rey. The proposed Project would cross Ballona Creek ~~bicycle~~ Bike Path on Lincoln Boulevard. The Strand ~~bicycle~~ Bike Path is a 22-mile-long path that runs along the Pacific Ocean. It starts at Will Rogers State Beach in Pacific Palisades and ends at Torrance Beach in Torrance. In the Project area, it is located along Vista Del Mar. The South Bay ~~Bike~~-Trail is located along Vista Del Mar, and the Culver Boulevard ~~bicycle~~ Bike Path runs parallel to Culver Boulevard.

*The second to last full paragraph on page 4-118 is revised as follows:*

Public transportation that may be affected as a result of Project construction includes the following: Metro Line 108/35; Santa Monica Big Blue Bus Lines 3, 6, and 11; Culver ~~City Bus~~ CityBus Lines 1, 2, and 5, and 7; and Commuter Express Lines 437 and 438. Project construction activities may require the use of existing bus stop curb lane areas. To the extent practicable, temporary bus stop closures would be accommodated with replacement bus stops outside of the immediate work area. These temporary closures, however, would need to be located along wide portions of the roadway where the maximum number of travel lanes could be accommodated during construction.

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# APPENDIX A: MITIGATION MONITORING AND REPORTING PROGRAM

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## MITIGATION MONITORING AND REPORTING PROGRAM

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<b>Biological Resources</b>						
BIO-1	The proposed Project would not discharge groundwater to the Ballona Creek or Ballona Wetland habitat.	During construction	LADWP			
BIO-2	<p>If construction activities on or around Lincoln Boulevard Bridge crossing over Ballona Creek are scheduled to occur during the breeding season (February 1 to August 31), preconstruction surveys for nesting birds shall be conducted. The preconstruction nest survey would include a visual examination of potential nest sites beneath the bridge.</p> <p>If nesting birds are found, a buffer around the nest would be erected to ensure that Project activities are not conducted within the buffer(s) until the nesting cycle is complete or the nest fails due to non-Project related reasons.</p> <p>Nesting opportunities on the underside of the bridge may also be limited by covering areas of the exposed bottom deck with temporary netting or removing unoccupied, inactive mud nests or partial nests that may be present from previous nesting attempts. A Project Biologist with nest deterrent experience will evaluate and accept proposed nest deterrent efforts prior to the start of nesting season (February 1).</p>	Prior to and during construction (breeding season = February 1 to August 31)	LADWP			

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<b>Cultural and Paleontological Resources</b>						
CUL-1	<p>Construction would be monitored by a qualified archaeologist during trenching and other ground-disturbing activities when that disturbance occurs in native soil, and any native soil that is removed will be made accessible to the archaeological monitor. Should previously unrecorded cultural resources be discovered during construction, construction would halt until the on-site cultural resource monitor and Native American monitor have had the opportunity to investigate the resource and assess its significance.</p> <p>The portions of the route that would be monitored for cultural resources when construction occurs within native soils are:</p> <ul style="list-style-type: none"> <li>• Vista Del Mar from Imperial Highway to Sandpiper Street;</li> <li>• Sandpiper Street;</li> <li>• W. Westchester Parkway between Pershing Drive and Stanmoor Drive;</li> <li>• Lincoln Boulevard between 83<sup>rd</sup> Street and Culver Boulevard; and</li> <li>• Culver Boulevard between Lincoln Boulevard and Centinela Avenue</li> </ul>	During construction	LADWP			
CUL-2	Native American monitors shall observe construction-related ground disturbance in native soil within the areas specified in CUL-1.	During construction	LADWP			
CUL-3	Before the initiation of ground-disturbing activities, all construction personnel shall be trained regarding the recognition of possible subsurface cultural resources and protection of all cultural resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural resources.	Prior to and during construction	LADWP			

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
PR-1	Based on the location of highly sensitive underlying geologic formations, a qualified paleontologist shall be retained to design and implement a paleontological resource mitigation plan (PMTP). The qualified paleontologist shall attend relevant pre-construction meetings to consult with grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. The PMTP shall identify construction impact areas where high sensitivity paleontological resources may be encountered and the depths at which those resources are likely to occur. The PMTP shall outline a coordination strategy for monitoring, detail significance criteria used to determine data potential of resources, and describe methods of recovery, preparation, analysis, and final curation of specimens.	Prior to and during construction	LADWP			
PR-2	A paleontological monitor shall be retained on a full-time basis to monitor Project-related excavations in areas underlain by formations of high sensitivity for paleontological resources. The areas deemed to have potential for presence of paleontological resources that shall be monitored during construction-related excavation include: <ul style="list-style-type: none"> <li>• Lincoln Boulevard between Jefferson Boulevard and 83<sup>rd</sup> Street</li> <li>• Centinela Avenue between Ocean Park Boulevard and Venice Boulevard</li> </ul>	During construction	LADWP			
PR-3	Before the initiation of ground-disturbing activities, all construction personnel shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of paleontological resources.	Prior to and during construction	LADWP			

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
PR-4	When fossils are discovered, the qualified paleontologist (or paleontological monitor) shall recover them. In the instance of an extended salvage period, the paleontologist shall work with the construction manager to temporarily direct, divert, or halt earthwork to allow recovery of fossil remains in a timely manner. Because the potential for the recovery of small fossil remains, such as isolated mammal teeth, as determined by a qualified paleontologist, it may be necessary to collect bulk samples (up to 6,000 pounds) of sedimentary rock matrix.	During construction	LADWP			
PR-5	Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, and cataloged as part of the mitigation program. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited in a federally accredited repository for both vertebrate and invertebrate fossils such as the Natural History Museum of Los Angeles County or the Museum of Paleontology at the University of California, Berkeley. A final summary report shall be completed that outlines the results of the mitigation program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.	During construction	LADWP			
<b>Noise</b>						
NOI-1	Within the city limits of Los Angeles, construction operations would not occur between the hours of 9:00 p.m. and 7:00 a.m.; in any residential zone, or within 500 feet of land so occupied, before 8:00 a.m. or after 6:00 p.m. on any Saturday; nor at any time on Sunday. Construction operations are also restricted in Culver City, but can occur between 8:00 a.m. and 8:00 p.m. Monday through Friday, 9:00 a.m. and 7:00 p.m. on Saturdays, and 10:00 a.m. and 7:00 p.m. on Sundays. These hours comply with local noise ordinances.	During construction	LADWP			



Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
NOI-2	All noise-producing Project equipment and vehicles using internal combustion engines (including haul trucks) will be professionally fitted with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features. These devices will be professionally maintained in good operating condition so as to meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., air compressors) will be equipped with shrouds and noise control features that are readily available for that type of equipment.	During construction	LADWP			
NOI-3	Material stockpiles and mobile equipment staging, parking, and maintenance areas will be located as far as practicable from noise-sensitive receptors.	During construction	LADWP			
NOI-4	The use of noise-producing signals, including horns, whistles, alarms, and bells, will be for safety warning purposes only.	During construction	LADWP			
NOI-5	Electrically powered equipment instead of pneumatic or internal combustion-powered equipment will be used, where feasible.	During construction	LADWP			
NOI-6	No Project-related public address or music system will be audible at any adjacent receptor.	During construction	LADWP			
NOI-7	Within 10 days of commencement of construction, the Project applicant will provide notice of construction schedule to surrounding neighborhoods and will post information on the site in a location visible to the public, including the hours of operation and contact person with telephone number.	Prior to construction	LADWP			
<b>Traffic and Transportation</b>						
TR-1	<b>Transportation Management Plans (TMPs).</b> Prior to construction, a Traffic Management Plan (TMP) would be prepared and submitted to all agencies with jurisdiction of public roads that would be affected by the underground transmission line construction. TMPs would define the use of flag persons, warning signs, lights, barricades, cones, etc. according to standard guidelines outlined in the Caltrans Traffic Manual, the Standard Specifications for Public Works Construction, and the Work Area Traffic Control Handbook (WATCH).	Prior to construction	LADWP			

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**APPENDIX B: COASTAL COMMISSION EXEMPTION LETTER**

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**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
200 Oceangate, Suite 1000  
Long Beach, CA 90802-4302  
(562) 590-5071

**EXEMPTION LETTER**

**Date:** April 4, 2012

**Reference Number:** 5-12-016-X

**Applicant Name:** City of Los Angeles, Department of Water and Power

**Project Location:** Grand Avenue, Vista Del Mar Avenue, Sandpiper Street, Pershing Drive, Lincoln Boulevard and Culver Boulevard, in the planning areas of Playa Del Rey, Playa Vista and Venice of the City of Los Angeles.

**Project Description:** Installation of an underground electrical service line to improve reliability of existing service. Project will include trenching approximately 3 ft wide by 7 ft. deep, conduit and concrete encasement, and 12 ft by 14 foot maintenance vaults. Line will be placed within improved road right-of-ways, including hanging line under Lincoln Boulevard bridge. Work will not require placing construction equipment in channel and Best Management Practices will be implemented during construction.

This is to certify that this location and/or proposed project has been reviewed by the staff of the Coastal Commission. A coastal development permit is not necessary for the reasons checked below:

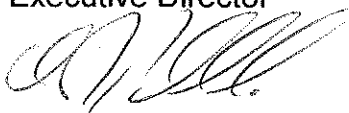
- The site is not located within the coastal zone as established by the California Coastal Act of 1976, as amended.
- The proposed development is included in Categorical Exclusion No. \_\_\_\_\_ adopted by the California Coastal Commission.
- The proposed development is judged to be repair or maintenance activity not resulting in an addition to or enlargement or expansion of the object of such activities and not involving any risk of substantial adverse environmental impact (Section 30610(d) of Coastal Act).
- The proposed development is an improvement to an existing single family residence (Section 30610(a) of the Coastal Act) and not located in the area between the sea and the first public road or within 300 feet of the inland extent of any beach (whichever is greater) (Section 13250(b)(4) of 14 Cal. Admin. Code).
- The proposed development is an improvement to an existing single family residence and is located in the area between the sea and the first public road or within 300 feet of the inland extent of any beach (whichever is greater) but is not a) an increase of 10% or more of internal floor area, b) an increase in height over 10%, or c) a significant non-attached structure (Sections 30610(a) of Coastal Act and Section 13250(b)(4) of Administrative Regulations).

- The proposed development is an interior modification to an existing use with no change in the density or intensity of use (Section 30106 of Coastal Act).
- The proposed development involves the installation, testing and placement in service of a necessary utility connection between an existing service facility and development approved in accordance with coastal development permit requirements, pursuant to Coastal Act Section 30610(f).
- The proposed development is an improvement to a structure other than a single family residence or public works facility and is not subject to a permit requirement (Section 13253 of Administrative Regulations).
- The proposed development is the rebuilding of a structure, other than a public works facility, destroyed by natural disaster. The replacement conforms to all of the requirements of Coastal Act Section 30610(g).
- Other: The proposed development is a public utility improvement to place transmission lines underground to meet increased demand of existing customers in order to maintain the existing standard of service.

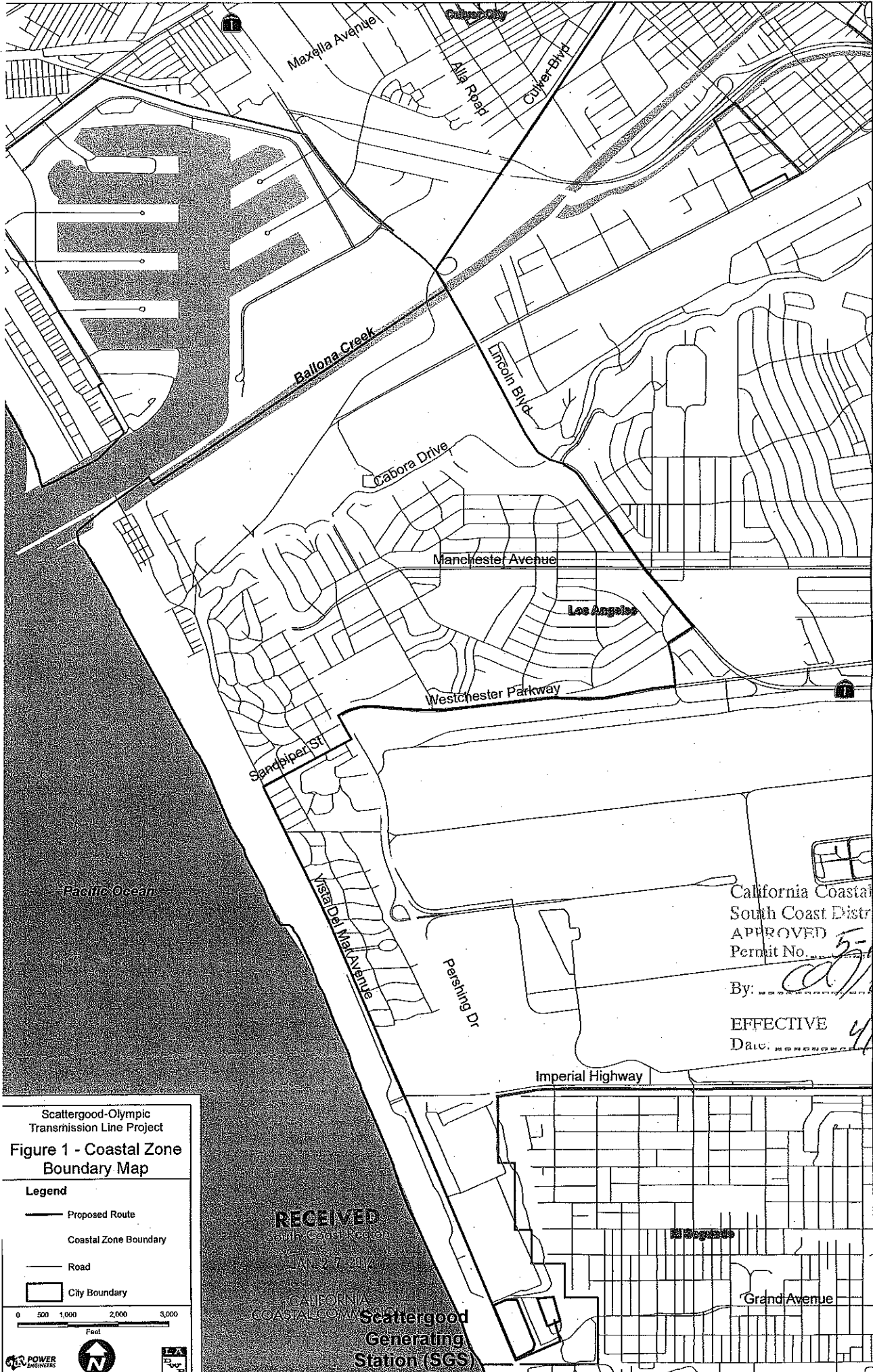
Please be advised that only the project described above is exempt from the permit requirements of the Coastal Act. Any change in the project may cause it to lose its exempt status. This certification is based on information provided by the recipient of this letter. If, at a later date, this information is found to be incorrect or incomplete, this letter will become invalid, and any development occurring at that time must cease until a coastal development permit is obtained.

Sincerely,

CHARLES LESTER  
Executive Director



Al J. Padilla  
Coastal Program Analyst



Scattergood-Olympic  
Transmission Line Project  
**Figure 1 - Coastal Zone  
Boundary Map**

**Legend**


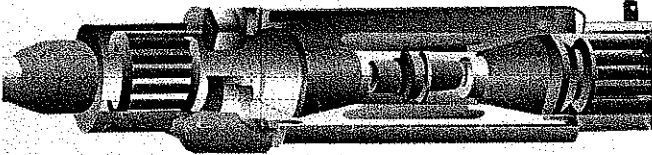


- Proposed Route
- Coastal Zone Boundary
- Road
- City Boundary

0 500 1,000 2,000 3,000  
Feet

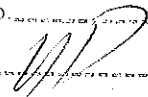
**RECEIVED**  
South Coast Region  
JAN 27 2012  
CALIFORNIA  
COASTAL COMMISSION  
**Scattergood  
Generating  
Station (SGS)**

California Coastal Commission  
South Coast District Office  
APPROVED  
Permit No. 5-12-016X  
By: *[Signature]*  
EFFECTIVE  
Date: 4/4/12

## Representative Photographs and Schematics

	<p><b>Cable System</b></p> <p><b>Comment:</b> Cables will be 230kV with plastic insulation encased in an external metallic covering for protection from moisture. An outer anti-corrosion jacket will also be included.</p>
 <p style="text-align: center; margin-top: 5px;">Construction of Pre-molded Joint</p>	<p><b>Cable Splices</b></p> <p><b>Comment:</b> Connections between cables will use a prefabricated splice similar to this schematic.</p>
	<p><b>Conduit Bank Installation</b></p> <p><b>Comment:</b> Work will occur entirely within the roadway right-of-way. The location of the cables under the road will vary. One lane of vehicular traffic for up to 300 feet is expected to be closed for construction at any one location.</p>
	<p><b>Example Maintenance Hole</b></p> <p><b>Comment:</b> An example maintenance hole shows facilities which are precast in 5 sections. For this project, about 60 maintenance holes are expected.</p>

California Coastal Commission  
South Coast District Office

APPROVED  
Permit No. ....  
By:  .....  
EFFECTIVE  
Date: .....