




RESOLUTION NO. _____

BOARD LETTER APPROVAL


Aram Benyamin (Sep 16, 2024 16:40 PDT)

ARAM BENYAMIN
Chief Operating Officer


David W Hanson (Sep 23, 2024 06:38 PDT)

DAVID W. HANSON
Senior Assistant General Manager
Power System



JANISSE QUIÑONES
Chief Executive Officer and Chief Engineer

DATE: September 9, 2024

SUBJECT: Approval of the McCullough – Victorville Transmission Lines 1 and 2 Upgrade Project and Certification of the Final Environmental Impact Report in Accordance with the California Environmental Quality Act

SUMMARY

This resolution is to fulfill LADWP's responsibilities under the California Environmental Quality Act (CEQA) prior to implementation of the Proposed McCullough-Victorville (MCC-VIC) Lines 1 and 2 Upgrade Project (Proposed Project).

The Proposed Project would upgrade the MCC-VIC Lines 1 and 2 circuits to newly rate them at approximately 570 kilovolts (kV) from their current rating of 500 kV. The utility corridor for the MCC-VIC transmission lines is entirely within the Mojave Desert and spans 162 miles from Boulder City, Nevada (NV) in Clark County, NV, to the Victorville Switching Station in Victorville, California (CA) within San Bernardino County, CA. The upgrade of the existing MCC-VIC transmission lines, which run parallel to each other, would provide critical transmission capacity and maintenance, and is required to accommodate incoming renewable energy resources along the West of Colorado River Path 46 transmission corridor. The Proposed Project would provide an additional 475 megawatts of electricity delivery capacity to the City of Los Angeles and would contribute over 15 percent toward LADWP's Renewable Portfolio Standard as part of LADWP's commitment to be 100 percent carbon-free by 2035, 10 years ahead of the

state's target. The Proposed Project is estimated to cost about \$820,000,000 for design and construction (budgeted).

City Council approval is not required.

RECOMMENDATION

It is recommended that the Board of Water and Power Commissioners adopt the attached Resolution certifying the Final Environmental Impact Report (EIR) authorizing approval of the Proposed Project.

ALTERNATIVES CONSIDERED

LADWP considered three alternatives to the Proposed Project in EIR. The first alternative included constructing all new transmission towers along the entire transmission line alignment to accommodate the transmission line upgrades. It is estimated that 1,508 (86 percent) of the 1,740 towers are in critical need of repair and would be reinforced under the Proposed Project, while approximately 153 towers would need to be replaced entirely. This alternative would have replaced all the towers, rather than just reinforcing and repairing which would result in more environmental impacts associated with increased tower disturbance areas as well as be logistically infeasible due to the line outages that would be required for a complete rebuilding effort. Therefore, this alternative was considered infeasible, and the full replacement alternative was not selected.

As a second alternative, LADWP considered an alternate powerline alignment to determine whether any of the significant effects of the Proposed Project would be avoided or substantially lessened by moving to another location. After review of available alignments and corridors within the Proposed Project vicinity, no large-scale corridors exist that could accommodate the Proposed Project. Additionally, LADWP does not have ownership or easements elsewhere within the vicinity of the existing transmission line. Furthermore, the intent of the project is to increase the rating of the Path 46 (Path) West of Colorado River Transmission corridor so if it is moved to another corridor then it would not meet its objective to achieve the Path rating. Therefore, relocating the Proposed Project to a new or alternate location is considered infeasible, and the new transmission line alignments alternative was not selected.

LADWP considered an alternative for which paving existing dirt access roads would be undertaken to reduce significant and unavoidable air quality impacts associated with construction travel along unpaved dirt roadways to access each tower. However, the paving of the access roads would still require that construction equipment travel along each access road to complete the paving activities, thereby still resulting in the need to travel along unpaved dirt roadways. In addition, the paving would result in more permanent impacts to any waterways along the Right-of-Way (ROW) and would require more maintenance and upkeep over the life of the project. Therefore, because this

alternative would result in the same environmental impacts than the Proposed Project, this alternative was considered infeasible and was not selected.

FINANCIAL INFORMATION

The Proposed Project is estimated to cost about \$820,000,000 for design and construction. Funding is budgeted in the Power Fund through Fiscal Year 2028/2029. The cost of this project will depend on the final design, outages granted for the project, and the number of crews needed to complete the work in the allotted time frame.

BACKGROUND

The Proposed Project would upgrade two existing transmission lines of MCC-VIC, Transmission Line 1 and 2, which run parallel to each other within a utility corridor owned and maintained by LADWP. The utility corridor is entirely within the Mojave Desert and spans 162 miles from Boulder City, NV in Clark County, NV, to the Victorville Switching Station in Victorville, CA within San Bernardino County, CA. The Proposed Project would require establishing a temporary work area at each of the 1,740 transmission towers along the alignment within LADWP's existing ROW primarily on United States Department of Interior, Bureau of Land Management (BLM) land. The Proposed Project includes:

- Maintenance and rehabilitation of access roads.
- Reinforcing or replacing tower structural steel members for approximately 1,508 towers.
- Complete tower replacement for approximately 153 towers.
- Tower raising for towers with ground-to-clearance violations and power line re-tensioning.
- Replacing all conductors, ground wires, insulators, and associated hardware assemblies.
- Adding grounding for every tower along the alignment.

ENVIRONMENTAL DETERMINATION

Determine item is in compliance with CEQA Guidelines Sections 15080-15097. In accordance with CEQA, an EIR was prepared to evaluate and disclose the potential environmental impacts associated with the construction and operation of the Proposed Project. The Proposed Project would have significant unavoidable impacts on air quality albeit significantly reduced effects with the implementation of mitigation measures. Adoption of the Resolution will result in the certification of EIR and adoption of the Mitigation Monitoring and Reporting Plan (MMRP), Findings of Fact, and Statement of Overriding Considerations, in addition to approving the project.

PUBLIC REVIEW

In accordance with CEQA, an Initial Study and EIR were prepared to analyze the impacts associated with the construction and operation of the Proposed Project:

- An Initial Study and Notice of Preparation (NOP) were made available for a 30-day public review period from April 2 to May 1, 2024.
- A public scoping meeting was held online on April 17, 2024.
- EIR was made available for a 45-day public review period from June 27 to August 12, 2024.
- Copies of EIR were made available for review on the LADWP website.
- The Notice of Availability of a Draft EIR was filed with the State Clearinghouse and San Bernardino County Clerk, as well as mailed to appropriate agencies, interested parties, and a list of CA Native American Tribes provided by the Native American Heritage Commission.
- A public meeting was held on July 18, 2024, to present the findings of EIR and receive comments from the public.
- A notice was also published in the Los Angeles Times on June 27, 2024.
- A total of 2 comment letters were received (Table 1).

Table 1.

Letter #	Agency/Organization	Date
1	Yuhaaviatam San Manuel Nation	July 12, 2024
2	California Department of Fish and Wildlife	August 12, 2024

Written Responses to Comments (RTC) are provided to demonstrate LADWP's careful consideration of the comments received. These responses provide LADWP's good faith and reasoned analysis on the major environmental issues raised in the comments. Commenters were directly responded to in writing. Comment letters and RTC are included as an attachment.

TRIBAL CONSULTATION

In accordance with LADWP's CEQA Tribal Consultation Policy, consultation invitation letters were sent to all 29 CA Native American Tribes provided on the Native American Heritage Commission list. Three tribes expressed interest in the project: the Morongo Band of Mission Indians, the Kern Valley Indian Community, and the Yuhaaviatam of San Manuel Nation. LADWP has communicated with each tribe on the Proposed Project and held formal or informal consultation meetings wherein project details along with the potential for tribal cultural resources to be encountered as part of project construction or operation were discussed. Tribal monitoring during construction is required as a mitigation measure listed in the MMRP. In addition, it is expected that one or more tribe may participate in surveying prior to construction start.

CITY ATTORNEY

The Office of the City Attorney reviewed and approved the Resolution as to form and legality.

ATTACHMENTS

- Resolution
- NOP
- Draft Initial Study
- NOA
- Draft EIR
- Final EIR
- MMRP
- Findings of Fact and Statement of Overriding Considerations
- Mailing List
- Project Map
- Proof of Publication