

**Sunshine Canyon Landfill 66-kV
Subtransmission Line Segment Relocation**

Addendum

to the

**Final Environmental Impact Report for the
Sunshine Canyon Landfill Extension Project,
County of Los Angeles
(State Clearinghouse No. 89071210)**

August 2013

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1.0 Introduction

This Addendum to the Final Environmental Impact Report for the Sunshine Canyon Landfill Extension Project (Landfill Extension Project; County of Los Angeles 1991) concerns the proposed relocation of an approximately 0.8-mile segment of an existing 66-kilovolt (kV) subtransmission line (the Proposed Project) that currently traverses the Sunshine Canyon Landfill (the landfill). The landfill extends into the jurisdictions of unincorporated Los Angeles County and the City of Los Angeles. The applicant for the Proposed Project is Southern California Edison Company (SCE).

Relocation of the subtransmission line structures, as proposed, would allow for development of the landfill, as permitted, without impairing effectiveness of the underground liner system. Liner installation is required in all landfill areas prior to the placement of waste to avoid groundwater contamination. The Proposed Project, together with a previously analyzed and approved subtransmission line segment, would also serve the approved, onsite Sunshine Gas Producers Renewable Energy Project (SGPREP).

The subtransmission line segment is part of the Chatsworth–MacNeil–Newhall–San Fernando 66-kV Subtransmission Line (66-kV Line). The need to relocate the 66-kV Line segment was identified and impacts generally addressed in several prior environmental impact analysis documents, including the Environmental Impact Report (EIR) certified by the County of Los Angeles (County) in 1991 for the Landfill Extension Project. The Proposed Project was most recently described, and specific impacts caused by a portion of the Proposed Project were evaluated, in the 2012 Subsequent Environmental Impact Report (SEIR) for the SGPREP. This Addendum to the EIR for the Landfill Extension Project provides additional analysis of the 0.8-mile 66-kV Line segment proposed to be relocated.

The California Public Utilities Commission (CPUC) prepared this Addendum in conformance with Public Resources Code Section 21166 and the Guidelines for California Environmental Quality Act (CEQA) Section 15000, California Code of Regulations Title 14, Chapter 3 (CEQA Guidelines). CEQA Guidelines Section 15164 states, “The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” CEQA Guidelines Section 15162 requires preparation of a subsequent EIR if substantial changes to the project analyzed in a previous EIR or new information of substantial importance would result in new significant environmental effects or a substantial increase in the severity of the previously identified significant impacts. Also, a subsequent EIR is required if mitigation measures previously identified as infeasible are now feasible or are substantially different from those analyzed in the EIR and could substantially reduce impacts of the project, and the project proponent declines to adopt them.

As shown in the following analysis, the Proposed Project would not result in any of the conditions that would require preparation of a subsequent EIR, supplemental EIR, or subsequent negative declaration (Public Resources Code Section 21166, CEQA Guidelines Sections 15162 and 15164). The analysis concludes that, with protective project design features and imposition of numerous applicable previously adopted mitigation measures, the impacts of the Proposed Project would be minor, and less than significant. Thus, the refined design of the Landfill Extension Project is properly addressed in an addendum to the Landfill Extension Project EIR. This Addendum provides the evidence and explanation for why a subsequent EIR is not required pursuant to CEQA Guidelines Section 15164(e).

1 **1.1 Background Information**
2

3 On November 9, 2012, SCE filed a Permit to Construct application (A.12-11-007) with the CPUC to
4 relocate a segment of its 66-kV Line. The 66-kV Line segment would be relocated from where it currently
5 traverses near the center of the landfill (Structures B through E; Figure 1), along the City/County
6 boundary, to the landfill's northern perimeter (Structures 5 through 16).¹
7

8 SCE proposed relocating the 66-kV Line segment at the request of the landfill's owner, Browning Ferris
9 Industries of California, Inc. (BFI), a subsidiary of Republic Services, Inc. (Republic). BFI was the
10 applicant for the Landfill Extension Project. In 1991, the County certified an EIR for the Landfill
11 Extension Project. The County's EIR identified the need for SCE's proposed 66-kV Line segment
12 relocation but did not define the relocation alignment. Instead, the EIR stated that the new alignment would
13 be jointly defined by the applicant (BFI) and utility company (SCE), and that once the alignment was
14 determined, if potential impacts were identified, supplemental environmental analysis would be performed
15 for the relocation and the results included in an addendum to the EIR (County of Los Angeles 1989). This
16 Addendum presents the proposed 66-kV Line relocation alignment and results of the supplemental
17 environmental analysis for the relocation as contemplated by the County EIR.
18

19 **1.2 County Review, Landfill Extension Project Changes, and Subsequent**
20 **Environmental Reviews**
21

22 The following sections provide a summary of the Landfill Extension Project as initially evaluated in the
23 County of Los Angeles's EIR (Section 1.2.1, below) and the changes evaluated in the City of Los Angeles
24 Subsequent EIR (Section 1.2.2, below), County EIR and City SEIR addendum (Section 1.2.3, below), and
25 South Coast Air Quality Management District (SCAQMD) Subsequent EIR (Section 1.2.4, below)
26 (County of Los Angeles 1991, City of Los Angeles 1998, SCAQMD 2012a). Additionally, these sections
27 summarize the addendums and other documentation prepared for supplemental analysis concerning the
28 Landfill Extension Project. The initial review conducted for the County EIR acknowledged the need to
29 relocate the 66-kV Line segment, and the two subsequent EIRs contemplated this aspect of the Landfill
30 Extension Project.
31

32 **1.2.1 Final EIR for the Landfill Extension Project (County of Los Angeles)**
33

34 The landfill opened in 1958 on the City of Los Angeles side of the landfill property and ceased operation in
35 1991 when the land use variance required for operation expired. In the mid 1980s, while the landfill was
36 still operating within the City, BFI applied to the County for a Conditional Use Permit, and the County
37 began preparation of an EIR (hereinafter referred to as the County EIR) for extension of the landfill into
38 the County (County of Los Angeles 1989). The County Board of Supervisors certified the Final County
39 EIR in 1991.

¹ SCE's Permit to Construct application also included the removal of Structure A and installation of Structures 1 through 4 and 4a (Figure 2), but this work was approved by an Advice Letter filed by SCE at the CPUC (CPUC 2012a) prior to the completion of this Addendum as described in Section 1.2.4.



- New structures
- ▲ Existing structure to be replaced
- Structures to be removed
- Staging area
- Existing 66-kV subtransmission alignment
- Proposed 66-kV subtransmission alignment
- Permitted area limit of landfill liner
- Permitted grading limit*
- - - Municipal boundary

Sunshine Canyon 66-kV Relocation Project

Figure 1

Overview of the Proposed 66-kV Subtransmission Line Relocation

* Construction of the Proposed Project will not occur outside the landfill's permitted grading limit.

1 The County EIR contemplated that landfilling would eventually return to the City portion of landfill and
2 that City and County operations would eventually be combined into a single landfill. Accordingly, as a
3 condition of approval of the County's 1991 Conditional Use Permit, the Board of Supervisors directed
4 BFI to pursue an application with the City of Los Angeles to allow further landfilling within the City,
5 which would allow for the required amount of landfill space without appreciably expanding the total
6 footprint of separate operations in the City and County (County of Los Angeles 1991, SCAQMD 2011,
7 2012a). The County EIR was challenged in court, and from 1991 through 1993, several addenda and
8 additional analysis documents were prepared including those to document responses to additional
9 comments received on the EIR. In 1993, the County recertified the EIR as supplemented by these
10 documents (SCAQMD 2012a). Notably, the County's EIR was the first of the documents described in this
11 Addendum to identify the need to relocate the 66-kV Line segment that spans the landfill (County of Los
12 Angeles 1989 [Draft EIR, pp. 16, 21, 59, 244]). However, because the precise alignment of the relocated
13 66-kV Line segment was unknown, the County EIR did not specifically evaluate its impacts.
14

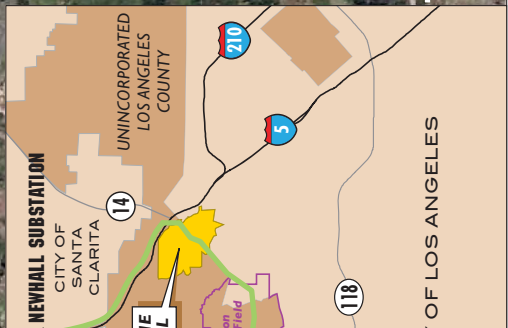
15 **1.2.2 Final Subsequent EIR for the Landfill Extension Project (City of Los** 16 **Angeles)**

17
18 In 1991, BFI applied to the City of Los Angeles to extend the landfill within the City. Public scoping was
19 completed in 1992, and after modifications to the project were made in 1995, the City circulated a Draft
20 Subsequent EIR (hereinafter referred to as the City SEIR) in 1997. The City SEIR evaluated BFI's
21 proposal for construction and operation of a landfill area within the city limits and an area located on the
22 adjacent, County side of the landfill that would be developed to facilitate operation of a connected and
23 jointly operated County-City landfill (City of Los Angeles 1997). The Final City SEIR was circulated in
24 1998 and later certified with the necessary City entitlements, to carry out the Landfill Extension Project in
25 1999. A statement of overriding considerations was adopted for significant and unavoidable impacts on
26 air quality (City of Los Angeles 1997, 1998, 1999b, SCAQMD 2012b). The certified City SEIR and City
27 approval of the Landfill Extension Project were challenged in court, but the City SEIR and City approval
28 were upheld, even after appeal. The City SEIR identified the need to remove the interior towers
29 (Structures B through D; Figure 2) and replace the exterior towers (Structures A and E; Figure 2) for the
30 66-kV Line segment, and evaluated the associated impacts to electricity service (City of Los Angeles
31 1998 [Final SEIR, pp. 4-443 – 4-446]).
32

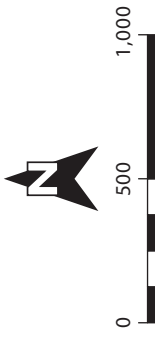
33 The City SEIR did not describe or evaluate the precise alignment or associated construction and
34 operations activities required for removing and replacing towers for the 66-kV Line segment, however, as
35 those details had not been sufficiently developed to allow for detailed environmental review.
36

37 **1.2.3 Addendum to County EIR and City EIR for the Landfill Extension Project** 38 **(County of Los Angeles) and Joint County and City Operation of Landfill** 39

40 In 2004, an addendum to County EIR and City SEIR was prepared to ensure consistency between County
41 and City permits and conditions of approval (County of Los Angeles 2004). The County's 2004
42 addendum incorporated the mitigation measures concerning impacts to utilities, including impacts
43 associated with removing and replacing the 66-kV Line segment structures (County 2004 addendum [pp.
44 3-86, 3-91]). The County's 2004 addendum concluded that revisions to the County's Conditional Use
45 Permit for the landfill proposed by the applicant, BFI, did not require revisions to the County EIR or City
46 SEIR. Landfill operation within the City side of the landfill reopened in 2005.



- Existing 66-kV subtransmission alignment**
- Proposed 66-kV subtransmission alignment
- Staging area
- Permitted area limit of landfill liner
- ⋯ Permitted grading limit
- - - Municipal boundary



Sunshine Canyon

Sunshine

l property boundary

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1
2 In 2006, the County released a Findings of Fact and Statement of Overriding Considerations and updated
3 the landfill's Mitigation Monitoring and Reporting Summary to establish the basis for adopting an
4 updated Conditional Use Permit for landfill operations on the County side of the landfill and joint
5 County-City operations (County of Los Angeles 2006a, 2006b). Overriding considerations were adopted
6 for significant and unavoidable impacts on air quality and biota (biological resources). The updated
7 County Conditional Use Permit was adopted in 2007 along with 83 conditions of approval and an
8 Implementation and Monitoring Program document (County of Los Angeles 2007a, 2007b). Joint
9 County-City operation of the landfill began in 2009 (Republic 2010).

10
11 The supplemental 2004, 2006, and 2007 County documentation did not specifically evaluate the precise
12 alignment or associated construction and operations activities required for the 66-kV Line segment's
13 relocation.

14 15 **1.2.4 Final Subsequent EIR for the Sunshine Gas Producers Renewable Energy** 16 **Facility at the Landfill (SCAQMD)**

17
18 Both the County EIR and City SEIR contemplated that a system for generating energy from landfill gas
19 would eventually be constructed at the landfill site and that the SCAQMD would be closely involved with
20 permitting of the landfill-gas-to-energy facility. The specifications and location of the gas-to-energy
21 facility, however, were not defined or evaluated in the County EIR, County addendum, City SEIR, or
22 associated documents. In 2012, the SCAQMD prepared and certified a Final SEIR (hereinafter referred to
23 as the SCAQMD SEIR) for the SGPREP (SCAQMD 2012a, 2012b). The SGPREP, as approved by the
24 SCAQMD, is planned for construction within the northeast corner of the County side of the landfill.

25
26 The SCAQMD SEIR fully analyzed a portion of the proposed 66-kV Line segment to be relocated
27 (Structures 1 through 4 and 4a; Figure 2), because relocation of this portion of the segment would be
28 required for operation of the SGPREP (SCAQMD 2011 [Draft SEIR, pp. 1-8, 2-1, 2-14, 2-18, 4-5, 4-13 –
29 4-15, 4-28 – 4-33, 4-50 – 4-52]). In addition, the SCAQMD SEIR generally evaluated the impacts of
30 Structures 5 through 16 as part of its analysis of alternatives and cumulative impacts (SCAQMD 2011
31 [Draft SEIR, pp. 1-18 – 1-25, 5-1 – 5-28, 6-3 – 6-16]). The SCAQMD SEIR's discussion and evaluation
32 of the proposed 66-kV Line segment relocation is further discussed in Section 3.1 of this Addendum.

33
34 An Advice Letter from SCE was approved by the CPUC in August 2012 for the construction of Structures
35 1 through 4 and 4a and removal of Structure A, which will be replaced by Structure 1. The Advice Letter
36 also approved construction of a new 105-foot by 75-foot SCE 66-kV switchyard for the SGPREP within
37 the permitted grading limit of the landfill (CPUC 2012a). At the time of preparation of this Addendum,
38 Phase I construction of the SGPREP and construction of the SCE switchyard and Structures 1 through 4
39 and 4a had commenced. It is anticipated that the switchyard and structures will be operational by the end
40 of 2013. Completion of the final construction phase for the SGPREP (Phase VI) is anticipated late 2014
41 or early 2015 (SCAQMD 2012a, SCE 2012a, 2013a, UltraSystems 2013).

42 43 **1.3 Landfill Extension Project Mitigation Measures, Conditions of** 44 **Approval, and Permit Requirements Overview**

45
46 The County EIR, City SEIR, and SCAQMD SEIR each required mitigations measures and conditions of
47 approval for aspects of the Landfill Extension Project. More than a thousand mitigation, condition, and
48 permit requirements were adopted and are now monitored by UltraSystems and other consultants to the
49 agencies with jurisdiction over landfill construction and operations (Lindsay 2012).

1 The County’s adopted measures and conditions are documented in the Landfill Extension Project’s
2 Findings of Fact and Statement of Overriding Consideration (County of Los Angeles 2006a); Mitigation
3 Monitoring and Reporting Summary (County of Los Angeles 2006b); Conditional Use Permit (County of
4 Los Angeles 2007a); and Implementation and Monitoring Program (County of Los Angeles 2007b). The
5 City’s adopted measures and conditions are documented in the Landfill Extension Project’s Mitigation
6 Monitoring and Reporting Program (City of Los Angeles 1999a); and General Plan Amendment and
7 Zoning Change (City of Los Angeles 1999b).

8
9 The SCAQMD’s adopted measures and conditions are documented in the Findings, Statement of
10 Overriding Considerations, and Mitigation, Monitoring and Reporting Plan for the SGPREP (SCAQMD
11 2012b). California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers
12 (ACOE), Los Angeles Regional Water Quality Control Board (RWQCB), and other agency permit
13 requirements are documented in their respective permits and reprinted, in part, in the Sunshine Canyon
14 Landfill Local Enforcement Agency Mitigation Monitoring Database document (SCL-LEA 2013). A
15 discussion of the applicability of the landfill’s existing mitigation, condition, and permit requirements to
16 the construction and operation of the Proposed Project is provided in Section 3.2 of this Addendum.

17 18 **1.4 Shift in Lead Agency**

19
20 As the California agency responsible for the regulation of investor-owned electric utilities, including
21 SCE, the CPUC is required to ensure that all new or upgraded electric power line facilities designed for
22 immediate or eventual operation at any voltage between 50 kV and 200 kV are constructed in compliance
23 with CPUC General Order No. 131-D, CPUC General Order No. 95, and other standards and
24 requirements. The CPUC has determined that construction and operation of the Proposed Project is
25 subject to CPUC jurisdiction.

26
27 In compliance with General Order No. 131-D, the CPUC has prepared this Addendum to the Final
28 County EIR for the Landfill Extension Project. The CPUC has assumed the role of Lead Agency for the
29 Landfill Extension Project as it is the next public agency required to grant a discretionary approval for a
30 component of the Landfill Extension Project after it was approved by the prior lead agencies (CEQA
31 Guidelines Sections 15052 and 15096(e)(4)).

32 33 **1.5 Incorporation by Reference**

34
35 This Addendum incorporates by reference, pursuant to CEQA Guidelines Section 15150, the relevant
36 discussions concerning the Proposed Project from the County’s EIR and addendum, City’s SEIR, and
37 SCAQMD’s SEIR. The discussion concerning the Proposed Project’s impacts in Section 4 of this
38 Addendum summarizes information from each of these prior environmental review documents and
39 provides citations to the source documents. Additional information about the County and City mitigation,
40 condition, and permit requirements that would be applicable to the Proposed Project is provided in
41 Section 3.2 of this Addendum and in Attachment A.

42
43 This Addendum also incorporates by reference the discussion of impacts on aesthetic resources, air
44 quality, fire risk, biological resources, cultural resources, and transportation and traffic and from
45 greenhouse gas emissions associated with construction of the 66-kV Line across the landfill and the
46 traffic impact study prepared for the Aliso Canyon Gas Turbine Replacement Project, hereinafter referred
47 to as the Aliso Canyon Project (CPUC 2012b, 2012c). As part of the Aliso Canyon Project, the 66-kV
48 Newhall–Chatsworth section of the 66-kV Line that crosses the landfill would be replaced to ensure
49 sufficient power can be provided to new electric-driven compressors proposed for installation at the Aliso
50 Canyon Natural Gas Storage Field. The new 66-kV Newhall–Chatsworth section addressed in the Aliso

1 Canyon Project EIR would include the smaller 0.8-mile-long 66-kV Line segment to be relocated as
2 described in this Addendum.

3
4 Neither the alignment for the relocated 66-kV Line segment proposed in this Addendum nor any other
5 specific alignment was defined as part of the Aliso Canyon Project EIR. Instead, it was assumed that, if
6 the 66-kV Line segment was not relocated as part of a project separate from the Aliso Canyon Project, the
7 66-kV Line segment would be replaced for the Aliso Canyon Project and follow the existing alignment
8 across the landfill (CPUC 2012c). The Aliso Canyon Project EIR and associated documents are available
9 online at http://www.cpuc.ca.gov/Environment/info/ene/aliso_canyon/aliso_canyon_home.html.

11 **2.0 Description of the Proposed 66-kV Line Segment** 12 **Relocation**

14 **2.1 Purpose**

15
16 As contemplated in the County’s EIR and the subsequent environmental review documents and approved
17 conditions for the Landfill Extension Project, the 66-kV Line segment’s existing structures are located in
18 areas permitted for landfilling that, if not relocated, would preclude landfill development in accordance
19 with approved facility permits and create a weakness in the landfill’s *liner system*—a contiguous
20 protective layer of low-permeability soil, flexible synthetic membrane, and leachate collection and control
21 systems required by the RWQCB, on which waste is received and placed, to protect groundwater from
22 contamination. The landfill liner is installed in an ongoing basis prior to the placement of waste in all
23 areas permitted for waste disposal by Los Angeles County Conditional Use Permit 00-194-(5), City of
24 Los Angeles Amended Zone Change Ordinance No. CPC 98-0184 (ZC/GPA)(MPR), and California
25 Integrated Waste Management Board Solid Waste Facilities Permit 19-AA-2000 (CIWMB 2008). Thus,
26 the purpose of the Proposed Project is to relocate the 66-kV Line segment to allow for development of the
27 landfill in accordance with approved permits without compromising the effectiveness of the landfill’s
28 liner system in preventing groundwater contamination.

30 **2.2 Location, Overview, and Schedule**

31
32 The landfill is located at 14747 San Fernando Road in Sylmar, California. Interstate 5 (I-5) runs along the
33 eastern border of the landfill (Figure 1). The surrounding areas to the north and west are undeveloped.
34 Residential neighborhoods are located approximately 1,500 feet south of the southernmost boundary of
35 the landfill within the Sylmar and Granada Hills communities of the City of Los Angeles. SCE’s existing
36 66-kV Line crosses near the center of the landfill along the border between unincorporated Los Angeles
37 County and the City of Los Angeles.

38
39 The Proposed Project would include Structures 5 through 16 (Figure 1). Existing 66-kV Structures B, C,
40 D, and E (depicted in Figure 1) would be removed as part of the Proposed Project. Two of the four 66-kV
41 structures to be removed (Structures D and E) are located within the City of Los Angeles, and one of the
42 proposed 66-kV structures (Structure 16) would be installed at the site of Structure E within the City of
43 Los Angeles. The other structures to be installed or removed are located within unincorporated Los
44 Angeles County. It should also be noted that existing 66-kV Structure A would be removed and
45 66-kV Structures 1 through 4 and 4a (Figure 2) would be installed as approved by an Advice Letter filed
46 by SCE (CPUC 2012a); because the removal and installation of these structures has already been

1 approved after previous CEQA review for the SGPREP (SCAQMD 2012a), they are not part of the
2 Proposed Project evaluated in this Addendum.²

3
4 Construction activities (e.g., bulldozer, crane, and helicopter use) would be scheduled during daytime
5 hours between 7:00 a.m. and 7:00 p.m. (Monday through Saturday) within the landfill's permitted hours
6 of operation. Construction activities that may occur during nighttime periods to avoid periods of high
7 electrical use are evaluated in Section 4.5, "Noise," of this Addendum. Nighttime construction would not
8 include the use of helicopters. The applicant anticipates that construction of the proposed 66-kV
9 subtransmission line relocation would take 4 to 6 months and that the relocated 66-kV Line segment
10 would be operational by summer 2014 assuming that construction commences in January 2014 (SCE
11 2012a).

12 **2.3 Structures, Equipment, Disturbance Areas, and Easements**

13
14
15 The existing 66-kV Line segment is approximately 0.8-miles long (Structures A through E). After
16 relocation, the proposed 66-kV Line segment (Structures 5 through 16) would be approximately 1.2-miles
17 long.³ The 12 structures to be installed would be tubular steel poles (TSPs) that are 75-feet to 100-feet tall
18 (up to 100-feet above ground surface). The four structures to be removed are composed of wood poles,
19 lightweight steel poles, or lattice steel and extend 50-feet to 84-feet above ground surface. The Proposed
20 Project would not include the installation of telecommunications lines or equipment; however, overhead
21 optical ground wire would be installed as part of the Aliso Canyon Project. Conductor size requirements
22 (e.g., size 336 versus size 954 aluminum steel-reinforced conductor) and overhead optical ground wire
23 required for the Aliso Canyon Project are further discussed in SCE's response to comments from the
24 CPUC's Division of Ratepayer Advocates (SCE 2012b). Refer to Section 1.5 of this Addendum for a
25 description of the Aliso Canyon Project.

26
27 Construction activities for the Proposed Project would occur entirely within the permitted grading limit of
28 the landfill with the following exception. Offsite equipment and materials staging would occur at one of
29 the following, existing SCE facilities and at Whiteman Airport (helicopter staging, see also Attachment
30 B):

- 31 • Northern Trans/Sub Regional Office / Pardee Substation in Santa Clarita, California; or
- 32 • Valencia Service Center in Valencia, California.

33
34
35 A small, Hughes 500 E helicopter or similar would be used for *wire stringing*—the installation of
36 conductor on the proposed structures. Helicopter landings would only occur within the permitted grading
37 limit of the landfill, at one of the landfill's existing helicopter pads, or at Whiteman Airport, which is
38 located approximately 7.5 miles southeast of the landfill in the Pacoima district of the City of Los
39 Angeles. The same operations and maintenance activities, including emergency repair (if necessary),
40 would be required for the relocated 66-kV Line segment as for the entire 66-kV subtransmission line.

41
42 For construction and operation of the Proposed Project, SCE would use existing access roads constructed
43 by Republic for landfill operations. All access roads that may be constructed specifically for the existing
44 66-kV structures (B through E) and proposed 66-kV structures (5 through 16) as part of the Proposed
45 Project would only be located within the permitted grading limit of the landfill.

² Structure A is expected to be removed after the Proposed Project evaluated by this Addendum is constructed because Structures 1 through 4 and 4a and the proposed Structures 5 through 16 must all be operational prior to connecting the new structures to the existing 66-kV Line.

³ With Structures 1 through 4 and 4a included, which will be installed as part of the approved SGPREP (described in Section 3.1 of this Addendum), the relocated line segment would be approximately 1.6-miles long.

1
2 Temporary disturbance areas, including disturbance for the removal of existing structures, would require
3 up to 150 feet on each side of the existing and proposed 66-kV Line segment centerlines. Equipment and
4 materials staging areas within the permitted grading limit of the landfill are shown on Figure 1. The
5 entirety of each of these staging areas is currently graded and disturbed due to landfill operations (E & E
6 2013).

7 8 **2.3.1 Subtransmission Line Easement**

9
10 SCE's current 66-kV Line segment easement allows for construction and operation within a 50-foot-wide
11 strip of land along the 66-kV alignment across the landfill. SCE would obtain a new easement from
12 Republic for a 50-foot-wide strip of land along the alignment of the proposed 66-kV Line segment. The
13 new 66-kV Line segment easement to be granted to SCE by Republic prior to start of construction would
14 describe the strip of land accessible to SCE and define operations parameters (e.g., right to control brush)
15 that would allow SCE to maintain the utility infrastructure installed within the easement.
16

17 **2.4 Required Approvals and Permitting**

18 19 **2.4.1 California Public Utilities Commission**

20
21 SCE has applied to the CPUC for a Permit to Construct the Proposed Project as described in Section 1.1
22 of this Addendum. The CPUC's Administrative Law Judge will review this Addendum, which was
23 prepared to evaluate SCE's Permit to Construct application pursuant to CEQA, and include the
24 Addendum in a Draft Proposed Decision for consideration by the CPUC commissioners prior to the
25 CPUC's vote on the Permit to Construct application and adoption of the Addendum. Draft Proposed
26 Decisions are typically released for a 30-day public comment period, subsequent to which a revised
27 Proposed Decision is prepared and submitted to the commissioners for vote and certification.
28

29 **2.4.2 Other Permitting**

30
31 Construction activities for the Proposed Project would be covered under Republic's Industrial General
32 Permit when Republic updates the Storm Water Pollution Prevention Plan (SWPPP) and site map for the
33 landfill to account for the 66-kV structures that would be removed and installed. In doing so, Republic
34 would also assume responsibility pursuant to the landfill's Industrial General Permit for compliance with
35 the permit during construction of the proposed subtransmission line relocation. In lieu of coverage under
36 Republic's Industrial General Permit, SCE may apply separately for a construction stormwater permit
37 pursuant to the National Pollutant Discharge Elimination System permitting process (Yang 2012).
38

39 Regardless of how permit coverage is obtained, the permit applicant would create an Erosion and
40 Sediment Control Plan and employ best management practices (BMPs) to address stormwater runoff
41 including water quality control measures (boundary protection), spill reporting, and concrete waste
42 management, as applicable to the proposed subtransmission line relocation. The Industrial General Permit
43 requirements would ensure that a site-specific SWPPP and monitoring plan are implemented that also
44 apply to the proposed subtransmission line relocation. In the SWPPP, sources of pollutants are identified
45 and BMPs (e.g., the use of fiber rolls, silt fencing constructed of synthetic filter fabric, and vegetated
46 buffers to trap sediment and remove pollutants from runoff) to manage the sources are defined to reduce
47 storm water pollution.
48

1 SCE also anticipates that a California Department of Transportation permit would be required for the
2 transport for oversized loads (e.g., for 66-kV structure delivery). Additionally, all activities of the
3 Proposed Project would need to comply with the conditions of permits issued for the landfill by CDFW,
4 SCAQMD, USACE, and RWQCB permits to the extent applicable (see Section 3.2 and Attachment A).
5

6 **3.0 Prior Description of the 66-kV Line Segment Relocation** 7 **and Changes to the Landfill Extension Project** 8

9 This section identifies which aspects of the Proposed Project were already reviewed pursuant to CEQA
10 either in the County EIR or in the subsequent CEQA documents prepared for the Landfill Extension
11 Project including the SCAQMD SEIR for the SGPREP. It then discusses applicability of the extensive list
12 of mitigation, condition, and permit requirements for construction and operation of the landfill to
13 construction and operation of the Proposed Project. It concludes with an overview of the changes to the
14 Landfill Extension Project required to make the Final County EIR adequate for the Proposed Project.
15

16 **3.1 Prior Description and Evaluation of the 66-kV Subtransmission Line** 17 **Segment Relocation** 18

19 As noted in Section 1.2, above, relocation of SCE's 66-kV Line segment was originally contemplated in
20 the County EIR. It was also contemplated in the City SEIR and SCAQMD SEIR. The County EIR stated
21 that although the relocation alignment was not identified, the relocated line was expected to remain on the
22 landfill property and was not expected to create a significant impact (County of Los Angeles 1989). The
23 County EIR anticipated that if new access roads would be required to service the relocated line, potential
24 effects on native vegetation could occur depending on the ultimate location of the relocated line and
25 access roads. SCE, however, proposes only to disturb areas within the existing permitted grading limit of
26 the landfill during construction and operation of the relocated 66-kV subtransmission line (SCE 2012a).
27

28 The County EIR and City SEIR assumed that the relocated SCE 66-kV subtransmission line could
29 traverse the center of the landfill. The County EIR stated that the subtransmission line end points on
30 either side of the landfill would be maintained (County of Los Angeles 1989). Although initial discussion
31 between SCE and BFI indicated that spanning the landfill with the installation of two larger 66-kV
32 structures may be feasible (City of Los Angeles 1997), it was later determined by SCE that the conductor
33 clearance requirements of CPUC General Order 95, Rules For Overhead Electric Line Construction, may
34 not be met, and that larger 66-kV structures may need to be installed outside the permitted grading limit
35 of the landfill. BFI/Republic noted that it would not be feasible to install structures within the landfill
36 liner without reducing the effectiveness of the liner. Therefore, while SCE proposes to maintain the
37 existing end points of the subtransmission line, it does not propose to span the width of the landfill (SCE
38 2012a). The CPUC contacted the County of Los Angeles and City of Los Angeles planning departments
39 to verify these findings from research of the available 1989 through 2013 Landfill Extension Project
40 documentation (CPUC 2012d, 2013b).
41

42 The SCAQMD SEIR presented and evaluated the design of several poles that would be required to
43 connect the 66-kV Line segment to be relocated to the larger 66-kV Line (Structures 1 through 4 and 4a;
44 Figure 2). These structures would be required for operation of the SGPREP. The SCAQMD SEIR,
45 however, evaluated Structures 5 through 16 as part of its analysis of cumulative impacts and of
46 alternatives. Construction of the entire 66-kV relocation as part of the SGPREP (Structures 1 through 16)
47 was evaluated as Alternative 4 within the SGPREP SEIR. Significant impacts that would occur during
48 SGPREP operation were determined to be the same under SGPREP Alternative 4 and the proposed
49 SGPREP, but SGPREP Alternative 4 would reduce construction air quality and greenhouse gas (GHG)

1 impacts because Structures 1 through 16 would not be constructed as part of the SGPREP. The following
2 features of the Proposed Project were evaluated in the SCAQMD SEIR:

- 3
- 4 • The complete length and location of the proposed 66-kV Line segment after relocation (including
- 5 Structures 1 through 16);
- 6 • Helicopter use for wire stringing; and
- 7 • Other vehicle and equipment required for 66-kV Line segment construction (SCAQMD 2012a).
- 8

9 The SCAQMD SEIR analyzed the 66-kV Line segment relocation's contributions to cumulative impacts
10 on air quality, from GHG emissions, and from noise. The SCAQMD SEIR determined that the SGPREP,
11 along with the Proposed Project and other projects within the evaluated cumulative scenario would result
12 in significant and unavoidable cumulative impacts on air quality and from GHG emissions. A Statement
13 of Overriding Considerations was included as an attachment to the certified Final SCAQMD SEIR
14 (SCAQMD 2012b). The CPUC contacted SCAQMD staff to verify these findings from research of the
15 2012 SCAQMD SEIR and associated documents (CPUC 2012e).

17 **3.2 Imposition of Applicable Landfill Extension Project Mitigation** 18 **Measures, Conditions of Approval, and Permit Requirements**

19
20 All activities that occur at the landfill, including those for the Proposed Project, will comply with all
21 applicable approved (1) County and City mitigation, condition, and permit requirements as listed in the
22 County's 2006a, 2006b, 2007a, and 2007b documents and City's 1999a and 1999b documents; and (2)
23 mitigation, condition, and permit requirements imposed by other agencies with jurisdiction over landfill
24 activities (e.g., CDFW, SCAQMD, USACE, and RWQCB).

25
26 For the purposes of this Addendum, a list of those approved mitigation, condition, and permit
27 requirements identified by the CPUC as most applicable to the Proposed Project is provided in
28 Attachment A. Attachment A also lists examples of mitigation, condition, and permit requirements that
29 clearly only apply to the main Landfill Extension Project, and would not apply to the Proposed Project.
30 Because the CPUC has not identified a need for any new or modified mitigation measures or conditions,
31 no program for monitoring or reporting has been created or modified (CEQA Guidelines Section 15097).

33 **3.3 Changes to the Landfill Extension Project Not Reviewed in the** 34 **Prior CEQA Documents**

35
36 Until the 2012 SCAQMD SEIR, neither the alignment of the proposed 66-kV Line segment nor
37 construction and operation activities for the Proposed Project had been defined or evaluated in detail.
38 Previous CEQA documents for the Landfill Extension Project stated only that relocation of the 66-kV
39 Line segment would be required (City of Los Angeles 1997, County of Los Angeles 1989). The
40 description of Proposed Project components and associated construction and operation activities in the
41 SCAQMD SEIR was substantially similar to the description of these components and activities presented
42 by SCE in its 2012 application to the CPUC (SCE 2012a). Given that construction and operation of
43 Structures 1 through 4 and 4a was already analyzed pursuant to CEQA for the SGPREP and approved by
44 the CPUC (SCAQMD 2012a, CPUC 2012a), Section 4 of this Addendum only addresses construction and
45 operation of proposed Structures 5 through 16.

46
47 Additional information about the 66-kV relocation relevant to transportation and traffic; aesthetics; and
48 noise was provided to the CPUC in 2012, and a cultural resources survey for the Proposed Project was
49 completed in 2013. This information is evaluated in the following section. Additional analysis regarding

1 biological resources, air quality, and GHGs is also provided because of new information provided to the
2 CPUC and significant and unavoidable impacts were identified with regard to these resource areas in the
3 County EIR, City SEIR, or SCAQMD SEIR that required overriding considerations. This Addendum
4 concludes that the Proposed Project's contribution to these significant and unavoidable impacts of the
5 much larger Landfill Extension Project would not be substantively different and would be negligible.
6

7 **4.0 Evaluation of Proposed Changes to the Landfill** 8 **Extension Project**

9 **4.1 Biological Resources**

10 **4.1.1 Setting**

11
12
13
14 Vegetation and wildlife species that currently occur or may occur at the landfill within or near the
15 proposed structure locations (Figure 1) are substantially similar to those identified in the County EIR,
16 County's 2004 addendum, City SEIR, and SCAQMD SEIR (City of Los Angeles 1997, County of Los
17 Angeles 1989, L&L Environmental 1997, SCAQMD 2012a, SCE 2012a, UltraSystems 1986). This
18 determination was made by comparing the results of the 2009 and 2012 surveys submitted as part of
19 SCE's application for the Proposed Project to the CPUC to update the baseline information for biological
20 resources at the landfill. The surveys covered an area that extends 250 feet from centerline along the
21 proposed 66-kV alignment (SCE 2012a). In addition to reviewing the updated species tables and figures
22 provided by SCE, GIS data from the 2009 and 2012 vegetation surveys were overlaid on mapped survey
23 data from 1986. Historical and current aerial imagery was used to verify mapped survey data as vegetated
24 areas and disturbed areas could easily be identified on images from 1994 (prior to disturbance on the
25 County side of the landfill) through 2012 (after disturbance on the County side of the landfill).
26

27 Among the vegetation and wildlife present or that may occur at the landfill as specified in 1986, 1997,
28 and 2012 are: coastal California gnatcatcher (federal threatened/species of special concern in California
29 [SSC]), golden eagle (fully protected under the California Fish and Game Code), least Bell's vireo
30 (federal endangered/state endangered), San Diego horned lizard (SSC), western burrowing owl (SSC),
31 coast live oak woodland, riparian habitat, and Venturan coastal sage scrub (UltraSystems 1986, County of
32 Los Angeles 2006a, SCE 2012a). A Statement of Overriding Considerations was adopted by the County
33 for impacts on coast live oak woodlands, riparian resources, Venturan coastal sage scrub, native
34 vegetation, and wildlife for which this vegetation provides habitat, e.g., coastal California gnatcatcher
35 (County of Los Angeles 2006a). A Statement Overriding Considerations was not adopted by the City or
36 SCAQMD for impacts on biological resources as part of the Landfill Extension Project (City of Los
37 Angeles 1997, 1999b, SCAQMD 2012b). The SCAQMD determined that the SGPREP would not have
38 any significant impacts on biological resources (SCAQMD 2012a [Final SEIR, p. 1-6]).
39

40 Baseline information about biological resources along the existing 66-kV Line segment that crosses the
41 landfill was updated by biological surveys conducted from 2009 through 2011 for the Aliso Canyon
42 Project EIR (CPUC 2012c), which is incorporated by reference to this Addendum (Section 1.5). The
43 Aliso Canyon Project would require reconductoring of the 66-kV Newhall–Chatsworth section of the 66-
44 kV Line that crosses the landfill (Structures A through E). The results of these surveys indicate that the
45 area to be disturbed during the removal of Structures B through D is already free of vegetation. The area
46 to be disturbed during the removal of Structure E on the City side of the landfill, however, would result in
47 the disturbance of up to 0.5 acres of land sparsely populated with Venturan coastal sage scrub (CPUC
48 2012c).
49

4.1.2 Impacts and Mitigation

The County's EIR for the Landfill Extension Project analyzed impacts on biological resources from construction and operations activities within the County side of the landfill, and it was determined that the Landfill Extension Project would cause significant impacts on a number of species and their habitat. The County's Statement of Overriding Considerations determined that although mitigation measures and conditions of approval would avoid or reduce impacts on biological resources, some impacts would remain significant. Nonetheless, landfilling was permitted and continues to be permitted within the County side of the landfill (CIWMB 2008) and an area permitted for grading was identified (Figure 1, Permitted Grading Limit).

The City's SEIR found that impacts on biological resources on the City side of the landfill could be avoided or reduced to less than significant levels with the implementation of mitigation (City of Los Angeles 1997, 1999b), and landfilling was permitted and continues to be permitted within the City side of the landfill (CIWMB 2008). An area permitted for grading was identified (Figure 1, Permitted Grading Limit). The Initial Study for the SCAQMD SEIR determined that there would be no impact on biological resources at the landfill because the: (1) permitted grading limit at the landfill (Figure 1) would not be increased by the SGPREP; and (2) SGPREP would be subject to mitigation, condition, and permit requirements already being monitored for activities at the landfill including activities associated with the installation of new infrastructure (see Attachment A to this Addendum).

Although the removal of Structure E would result in the disturbance of up to 0.5 acres of Venturan coastal sage scrub (CPUC 2012c), this impact would be reduced to less than significant levels by implementation of the Venturan Coastal Sage Scrub Mitigation Plan and Revegetation Plan requirements and associated mitigation measures for impacts on coastal California gnatcatcher, San Diego horned lizard, and other species for which Venturan coastal sage scrub provides habitat, see Attachment A (City of Los Angeles 1997, SCAQMD 2012a). Therefore, given the comprehensive list of mitigation, condition, and permit requirements that apply to landfill construction and operation activities, including the installation of new infrastructure such as the activities of the Proposed Project (see Attachment A), the Proposed Project would not result in one or more significant effects on biological resources not discussed in the prior CEQA documents for the Landfill Extension Project (see Section 1.2 of this Addendum), result in substantially more severe effects, or allow for the implementation of mitigation previously found to be infeasible that would now be feasible.

4.2 Transportation and Traffic

4.2.1 Setting

The County and City CEQA documents evaluated impacts on a number of regional and local roadways that would occur due to construction and operation of the Landfill Extension Project. The County's 2004 addendum updated the traffic studies completed in 1995 and 1988 based on the results of a supplemental traffic study prepared in 2002. Among the roadways included in the 2002 traffic study documented in the 2004 addendum were San Fernando Road and I-5 northbound and southbound ramps. The evaluation documented in the County's 2004 addendum did not identify new information or changes requiring substantial modifications to the prior CEQA documents (County of Los Angeles 2004).

Baseline information about transportation and traffic conditions in the Landfill Extension Project area was recently updated in the traffic impact study prepared for the Aliso Canyon Project EIR (see Section 1.5). Among the roadways included in the evaluation were the Old Road/San Fernando Road along which the landfill entrance is located and I-5 northbound and southbound ramps at Calgrove Boulevard that would

1 be used to access the landfill from existing SCE facilities located north of the landfill (CPUC 2012b,
2 2012c). SCE vehicles would travel between the landfill and existing SCE facilities that would be used as
3 staging areas to construct or operate the Proposed Project as described in Section 2.3 of this Addendum.
4

5 The results of the Aliso Canyon Project traffic impact study indicated that intersections would continue to
6 operate at an acceptable Level of Service during project construction and operation and that for
7 intersections currently being monitored because of high traffic volumes, Aliso Canyon Project truck trips
8 would remain below significance thresholds established by the County of Los Angeles Congestion
9 Management Plan (Metro 2010). Neither the existing nor the proposed 66-kV Line segment alignments
10 would be located within 2 miles of a public or private airport. The nearest airport is Whiteman Airport, a
11 public-use airport located approximately 7.5 miles southeast of the nearest existing and proposed 66-kV
12 structure locations at the landfill.
13

14 **4.2.2 Impacts and Mitigation**

15
16 SCE has committed to delivering materials by truck during off-peak traffic hours that fall within the
17 landfill's permitted hours of operation (see Attachment B). This would ensure that the truck trips
18 described in the PEA (approximately 30 trips one-way per day) remain well under significance thresholds
19 established by the County of Los Angeles Congestion Management Plan (Metro 2010, SCE 2012a). Road
20 closure is not anticipated for construction of the Proposed Project (SCE 2012a). In addition, SCE has
21 committed to landing helicopters only within the permitted grading limit of the landfill, at one of the
22 landfill's existing helicopter pads, or at Whiteman Airport (Attachment B). A small, Hughes 500 E
23 helicopter or similar would be used temporarily during construction for wire stringing and would travel
24 only 7.5 miles (each way) between Whiteman Airport and the landfill. Therefore, it is not anticipated that
25 a change in air traffic patterns that results in substantial safety risk would occur from construction or
26 operation of the Proposed Project.
27

28 Given the comprehensive list of mitigation, condition, and permit requirements that apply to landfill
29 construction and operation activities, such as the activities of the Proposed Project (see Attachment A)
30 and the results of prior CEQA review of traffic impacts for the Aliso Canyon Project (see Section 1.5), the
31 Proposed Project would not result in one or more significant effects on transportation and traffic not
32 discussed in the prior CEQA documents for the Landfill Extension Project. Construction and operation of
33 the Proposed Project would also not result in substantially more severe effects or allow for the
34 implementation of mitigation previously found to be infeasible.
35

36 **4.3 Aesthetics**

37 38 **4.3.1 Setting**

39
40 The County and City CEQA documents evaluated aesthetic resources associated with the landfill site and
41 impacts that would occur from construction and operation of the Landfill Extension Project. This
42 information was updated in the County's 2004 addendum, which stated that excavation, grading, and
43 landfilling had already altered the landfill site's topography and that the existing visual quality of the site
44 did not contain exceptional aesthetic characteristics that would warrant preservation. The evaluation
45 documented in the County's 2004 addendum did not identify new information or changes requiring
46 substantial modifications to the prior CEQA documents (County of Los Angeles 2004).
47

48 Baseline information about aesthetic resources in the Landfill Extension Project area was updated in the
49 Aesthetic Resources section of the Aliso Canyon Project EIR (CPUC 2012c), which is incorporated by
50 reference to this Addendum (Section 1.5). As described in the Aliso Canyon Project EIR, sections of I-5

1 and I-210 in proximity to the landfill are Eligible State Scenic Highways. According to the City SEIR, on
2 clear days, the interior of Sunshine Canyon is visible from areas southeast of the site. For motorists
3 traveling northbound on I-5, the interior of the canyon is visible after passing under the Balboa
4 Boulevard overpass. The interior of the canyon is only visible for a short duration (i.e., 20 to 30 seconds).
5 For motorists traveling westbound on the I-210 Freeway, the site is visible from a distance of about 6,000
6 feet (i.e., greater than 1 mile). From this distance, motorists would be able to view landfilling operations
7 (only when operations occur near the mouth of the canyon) for approximately 20 seconds, after which
8 time the site would not be visible (City of Los Angeles 1997).
9

10 **4.3.2 Impacts and Mitigation**

11
12 Some of the proposed 66-kV structures would be up to 16-feet taller (up to 100 feet above ground
13 surface) than the tallest structure to be replaced (84 feet above ground surface). The average height of the
14 proposed structures would be 88 feet above ground surface. No lighting would be installed, and the
15 proposed TSPs would have a de-glared hot-dipped galvanized finish. All conductor wire would be non-
16 specular. SCE does not anticipate that the new structures would be visible from I-5 or I-210, although the
17 tops of cranes used during construction may be temporarily visible from communities located east of I-5
18 (SCE 2012a). Even if the tops of some of the proposed TSPs may be visible for a very short duration by
19 motorists travelling on I-5 or I-210, the landfill is a highly disturbed area with existing 66-kV structures at
20 the site. The Initial Study for the SCAQMD SEIR determined that the SGPREP would not be visible from
21 highways in proximity to the landfill, and it was determined that no impact would occur on aesthetic
22 resources. The City SEIR determined that the Landfill Extension Project would not produce any
23 significant visual impacts (City of Los Angeles 1997, SCAQMD 2012a).
24

25 Impacts on aesthetic resources identified by the County EIR included those from the spread of litter, and
26 alteration to topographic features from excavation activities. Mitigation and conditions requiring
27 revegetation, litter control, and other measures, however, are already in place and would be applicable to
28 the installation of new infrastructure at the landfill, e.g., Structures 5 through 16 for the Proposed Project
29 (see Attachment A). In addition, SCE would remove all construction materials and debris from the
30 construction sites; would recycle them or properly dispose of them in accordance with all laws,
31 ordinances, and regulations; and would conduct a final inspection to ensure that cleanup activities are
32 successfully completed (see Attachment B). Therefore, the Proposed Project would not result in one or
33 more significant effects on aesthetic resources not discussed in the prior CEQA documents for the
34 Landfill Extension Project, result in substantially more severe effects, or allow for the implementation of
35 mitigation previously found to be infeasible.
36

37 **4.4 Air Quality and Greenhouse Gases**

38 **4.4.1 Setting**

39
40
41 Baseline information about air quality and GHG emissions within the Landfill Extension Project area was
42 updated in the 2012 SCAQMD SEIR. The air basin within which the landfill resides is in nonattainment
43 according to federal and state standards established for levels of particulate matter (dust particles) and
44 ozone (CARB 2012a, 2012b, 2012c, SCAQMD 2012a, USEPA 2012). It was also in nonattainment for
45 these pollutants in 2006 when the County completed its Findings of Fact and Statement of Overriding
46 Conditions for the Landfill Extension Project and continues to be in nonattainment (County of Los
47 Angeles 2006a). As of 2012, the region was in attainment/unclassifiable for nitrogen dioxide (NO₂) and

1 other *criteria pollutants*⁴ according to federal standards (77 Federal Register 9544) but not in attainment
2 according to California standards for nitrogen oxides (NO_x; CARB 2012d). In California, NO_x is the
3 standard for measurement instead of NO₂.

4
5 Air quality and GHG impacts from the construction of Structures 1 through 4 and 4a (to be constructed as
6 part of the SGPREP; see Section 3.1 of this Addendum) and proposed Structures 5 through 16 (in the
7 cumulative analysis completed for SGPREP), as well as operation of the 66-kV line to be located on these
8 structures were evaluated in the SCAQMD SEIR. A Statement Overriding Considerations and associated
9 mitigation measures and conditions were adopted by the County, City, and SCAQMD for the Landfill
10 Extension Project's and SGPREP's impacts on air quality and from GHG emissions (City of Los Angeles
11 1999b, County of Los Angeles 2006a, SCAQMD 2012b).

12
13 Baseline information about air quality and greenhouse gases in the Landfill Extension Project area was
14 also updated for the Aliso Canyon Project Draft EIR (see Section 1.5). The Aliso Canyon Project would
15 require reconductoring of the 66-kV Newhall–Chatsworth section of the 66-kV Line that crosses the
16 landfill (Structures A through E). Mitigation for NO_x emissions from the construction of SCE's
17 subtransmission line components of the Aliso Canyon Project was included in the Aliso Canyon Project
18 EIR (CPUC 2012c).

19 20 **4.4.2 Impacts and Mitigation**

21
22 Construction of the SGPREP commenced in October 2012 with initial site grading and is anticipated to
23 take approximately 2 years to complete. Construction of the switchyard and subtransmission line segment
24 for the SGPREP is anticipated to be completed by the end of 2013 (CPUC 2012a, Republic 2012,
25 SCAQMD 2012b, SCE 2013a). The SCAQMD SEIR determined that operation of the SGPREP would
26 result in significant impacts on air quality due to criteria pollutant and GHG emissions. SCAQMD
27 determined, however, that emissions associated with SGPREP construction activities would only generate
28 NO_x in excess of SCAQMD regional thresholds, resulting in a significant impact. Data from the
29 SCAQMD SEIR indicated that impacts from construction and operation of the 66-kV structures alone,
30 however, would not exceed SCAQMD thresholds for any of the evaluated air pollutants.

31
32 Construction of the 66-kV structures would include excavation, grading, structure foundation installation,
33 structure erection, conductor installation, material delivery, and site restoration, which would generate
34 fugitive dust and emissions of criteria pollutants and greenhouse gases. This analysis focuses on
35 construction NO_x emission because operation of the Proposed Project would not result in emissions of
36 criteria pollutants or GHGs in excess of SCAQMD thresholds, and only NO_x emissions from the
37 construction of all SGPREP components, including the gas-to-energy facilities, SCE switchyard, and SCE
38 subtransmission line segment, would result in NO_x emissions in excess of SCAQMD regional thresholds
39 (SCAQMD 2012a). It also discusses GHG emissions because the SCAQMD SEIR found that the
40 SGPREP, as a whole, would contribute significantly to cumulative impacts from GHG emissions.

41
42 Under a worst-case scenario, with water, bucket, light, 5-ton, and 30-ton trucks; cranes; and backhoes
43 operating continuously for 10 hours and 60-foot flatbed trucks and forklifts delivering materials, SCE
44 subtransmission line construction activities could emit up to 64 pounds of NO_x per day.⁵ Although the

⁴ Criteria pollutants include those for which the United States Environmental Protection Agency has set National Ambient Air Quality Standards. The seven principle pollutants include carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter less than or equal to ten microns in diameter, particulate matter less than or equal to 2.5 microns in diameter; and sulfur dioxide.

⁵ By comparison, in 2008, 758 tons of NO_x per day were emitted in the air basin with 87 percent of such emission from mobile sources (SCAQMD 2012c, County of Los Angeles 2006a).

1 SCAQMD threshold of 100 pounds of NO_x per day would not be exceeded under worst-case conditions,
2 because construction of the subtransmission line, switchyard, and gas-to-energy facilities may overlap,
3 the SCAQMD required that offsets be purchased in an amount equivalent to all SGPREP construction
4 NO_x emissions (SCAQMD 2012a [Final SEIR pp. 4-14 – 4-17, Tables 4-6, 4-8], 2012b [Final SEIR
5 Attachment 1 pp. 25–27, Table 3]). Additionally, SCE would purchase credits to offset NO_x emissions
6 for the relocation of Structures A through E because they would be part of the larger, 66-kV Line that
7 would be reconducted as part of the as part of the Aliso Canyon Project should the Aliso Canyon
8 Project be approved for construction (CPUC 2012c).

9
10 GHG emissions from SGPREP landfill gas combustion would be responsible for approximately 99.9
11 percent of the GHG emissions evaluated for the SGPREP. Emissions from the Proposed Project’s
12 construction activities, which were amortized for a period of 30 years, would result in approximately 0.1
13 percent of the SGPREP GHG emissions. Although the construction of SCE’s SGPREP components
14 would result in a very small share (conservatively estimated at 13 metric tons of carbon dioxide
15 equivalents per year) of the SGPREP emissions and the threshold (10,000 metric tons per year) would not
16 be exceeded, mitigation included in the SCAQMD required that offsets be purchased in an amount
17 equivalent to all construction GHG emissions from the SGPREP (SCAQMD 2012a [Final SEIR pp. 5-34
18 – 5-38, Table 5-7], 2012b [Final SEIR Attachment 1 pp. 28–29, Table 3]).

19
20 As part of the Aliso Canyon Project, SCE would purchase credits to offset NO_x emissions for the
21 construction of Structures B through E. As part of SGPREP, SCAQMD required that offsets be purchased
22 equivalent to all NO_x and GHG emissions. For the construction of Structures 5 through 16, SCE would
23 use engines that meet California Tier 3 off-road compression-ignition (diesel) engine certification
24 standards (Title 13, California Code of Regulations, Section 2423) for construction of the Proposed
25 Project. If not available, SCE would use engines that meet California Tier 2 off-road compression-ignition
26 certification standards (see Attachment B). Offsets for the construction or operation of Structures 5
27 through 16 would not be required because even with the most conservative estimates of NO_x and GHG
28 emissions, the thresholds would not be exceeded during construction or operation of Structures 5 through
29 16.

30
31 Therefore, given the comprehensive list of mitigation, condition, and permit requirements for landfill
32 construction and operation activities including the installation of Structures 5 through 16 (see Attachment
33 A), the Proposed Project would not result in one or more significant effects on air quality or from GHG
34 emissions not discussed in the prior CEQA documents for the Landfill Extension Project, result in
35 substantially more severe effects, or allow for the implementation of mitigation previously found to be
36 infeasible that would now be feasible.

37 38 **4.5 Noise**

39 40 **4.5.1 Setting**

41
42 Baseline information about noise at the Landfill Extension Project site was updated in the 2012
43 SCAQMD SEIR. Existing noise sources include vehicles on I-5 to the east and residential roadways to the
44 south, garbage trucks entering and leaving the landfill, landfill equipment use onsite (e.g., bulldozers),
45 and intermittent aircraft flyovers. For the SCAQMD SEIR, ambient noise conditions were recorded by
46 unmanned noise monitors placed throughout the landfill in 2009. The nearest sensitive receptors, which
47 are residences and areas zoned for residential uses, are located within the City of Los Angeles
48 approximately 3,800 feet southeast of the nearest 66-kV structure to be relocated. Daytime ambient noise

1 levels recorded were between 52.8 and 59.2 dBA⁶ at the closest sensitive receptors (Google Earth 2013,
2 SCE 2012a, SCAQMD 2012a). Baseline information within the County side of the landfill was
3 subsequently updated by a noise monitoring study completed for SCE in February 2013. The noise levels
4 recorded, which were averaged over 1-hour periods, ranged from 44.0 to 71.1 dBA (7:00 a.m. to 10:00
5 p.m.) and 41.9 to 59.2 dBA (10:00 p.m. to 7:00 a.m.) (SCE 2013b).
6

7 Within City of Los Angeles, construction equipment is not allowed to produce noise levels during the day
8 (7:00 a.m. to 10:00 p.m.) in excess of 75 dBA as perceived at 50 feet if in use within 500 feet of a
9 residential zone (City of Los Angeles Municipal Code Section 112.05). Construction is exempt from
10 requirements that no work occur between the hours of 9:00 p.m. and 7:00 a.m. (Monday through Friday)
11 in districts zoned for manufacturing or industrial uses. The landfill is zoned for heavy industrial uses
12 within the City of Los Angeles. Regardless of the exemption, construction work within 500 feet of
13 residences is not allowed to occur between 6:00 p.m. and 8:00 a.m. on Saturdays or national holidays or
14 at any time on Sundays (City of Los Angeles Municipal Code Section 41.40).
15

16 In the County of Los Angeles, daytime construction noise levels (7:00 a.m. to 8:00 p.m.) are not allowed
17 to exceed 75 dBA at residential structures. At night (8:00 p.m. to 7:00 a.m.), construction noise levels are
18 not allowed to exceed 60 dBA at residential structures (County of Los Angeles Code Section 12.08.440).
19

20 **4.5.2 Impacts and Mitigation**

21
22 During construction, SCE anticipates that daytime noise levels from equipment use could be as high as 99
23 dBA at 50 feet. At the closest sensitive receptor (approximately 3,800 feet), a noise level of 99 dBA
24 would be reduced to less than 50 dBA (SCAQMD 2012a, SCE 2012a). In addition, a Hughes 500 E
25 helicopter or similar would be used for wire stringing, which would generate noise levels of 75 dBA at
26 500 feet that would be reduced to 57 dBA at the closest sensitive receptor based on geometric attenuation
27 of 6 decibels per doubling of distance without ground attenuation (SCE 2012a). SCE has committed to
28 landing helicopters only within the permitted grading limit of the landfill, at one of the landfill's existing
29 helicopter pads, or at Whiteman Airport (see Attachment B). Helicopters would not be used within 500
30 feet of residences, and no conflict would occur with City of Los Angeles requirements for construction
31 noise.
32

33 Construction would occur during daytime hours between 7:00 a.m. and 7:00 p.m. (Monday through
34 Saturday), with the following potential exceptions:
35

- 36 • First, as described in Attachment B to this Addendum, SCE would deliver materials by truck
37 during off-peak traffic hours, which may occur prior to 7:00 a.m. or after 7:00 p.m. (Monday
38 through Friday). Truck deliveries for landfill operations and equipment maintenance purposes
39 (among which deliveries for 66-kV subtransmission line work would be included), however, are
40 permitted to occur as early as 6:00 a.m. or as late as 9:00 p.m. (Monday through Saturday) as
41 specified by the landfill's operational requirements (City COA Q-B3, County COA 29).
- 42 • Second, construction during nighttime periods may be temporarily required to avoid periods of
43 high electrical use (e.g., when the existing 66-kV subtransmission line can be temporarily de-
44 energized). Even if nighttime work is required, however, construction noise levels would not
45 exceed 50 dBA at the closest sensitive receptor. Helicopters would only be used during daylight
46 hours between 7:00 a.m. and 7:00 p.m. (Monday through Saturday). Within the County, noise
47 levels from nighttime construction activities are permitted to levels less than 60 dBA as perceived

⁶ The A-weighted decibel (dBA) scale is used for measurements and standards involving human hearing, which does not process all frequencies equally.

1 at sensitive receptors in single-family residential areas without a variance (County of Los Angeles
2 Code Section 12.08.440). In the City, the landfill is zoned for heavy industrial uses, and as such,
3 the proposed construction activities are not expected to require a variance (City of Los Angeles
4 Municipal Code Sections 41.40).

5
6 The SCAQMD SEIR determined that impacts from noise would be less than significant during
7 construction and operation of the SGPREP, including Structures 1 through 4 and 4a (SCAQMD 2012b)
8 without mitigation. Similarly, for Structures 5 to 16, construction and operation would not result in a
9 significant impact. The Proposed Project would also not result in substantially more severe effects than
10 already discussed in the prior CEQA documents for the Landfill Extension Project or allow for the
11 implementation of mitigation previously found to be infeasible.

12 **4.6 Cultural Resources**

13 **4.5.1 Setting**

14
15
16
17 Baseline information about cultural resources at the landfill site was updated by an archaeological survey
18 completed for the applicant in February 2010 at proposed disturbance areas for Structures 5 through 16.
19 No archaeological resources were found (ICF International 2013). Baseline information was updated for
20 the existing 66-kV structures (Structures A through E) by the cultural surveys prepared for the Aliso
21 Canyon Project (see Section 1.5). No archaeological resources were found in proximity to the existing
22 structures (CPUC 2012c). An additional survey was conducted in June 2013 to ensure that all areas that
23 may be disturbed for the construction and operation of Structures 5 through 16 were surveyed. No
24 archaeological resources were found within or in proximity to areas that would be disturbed (E & E
25 2013).

26 **4.6.2 Impacts and Mitigation**

27
28
29 Although no cultural resources were identified during the recent surveys that would be impacted by
30 construction or operation of the Proposed Project, the County EIR and City SEIR found that significant
31 impacts on cultural resources could occur because of the location of cultural sites in proximity to the
32 landfill. Mitigation measures were required to reduce impacts to less than significant levels. One cultural
33 site (CA-LAN-2369/H) is located within the property boundary of the County side of landfill. It is the
34 nearest cultural site to the proposed disturbance areas. The SCAQMD's SEIR found that construction or
35 operation of the SGPREP, including Structure 1 to 4 and 4a, would not result in significant impacts on
36 cultural resources that would require mitigation in addition to the existing mitigation requirements for
37 landfill operations (see Attachment A to this Addendum).

38
39 The results of the two, recent cultural surveys for the Proposed Project both indicate that neither cultural
40 site CA-LAN-2369/H nor any other recorded cultural site would be impacted by the Proposed Project
41 (E & E 2013, ICF International 2013). Mitigation measures and conditions that require archeological and
42 paleontological resources preconstruction surveys, construction monitoring, worker training, and curation
43 (e.g., County Mitigation Monitoring and Reporting Summary Section 5.0 Measures and City Mitigation
44 Reporting and Monitoring Program Section 4.19 Measures [City of Los Angeles 1999a, County of Los
45 Angeles 2006b]) during landfill operations would also apply to the Proposed Project (see Attachment A).

46
47 Additionally, SCE would present Worker Environmental Awareness Program training to all workers for
48 the Proposed Project prior to start of work that is based on final engineering designs and cultural survey
49 results that include a description of relevant mitigation and landfill operating procedures (see Attachment
50 B). Therefore, given the comprehensive list of mitigation, condition, and permit requirements for landfill

1 construction and operation activities including the installation of Structures 5 through 16 (see Attachment
2 A), the Proposed Project would not result in one or more significant effects with regard to cultural
3 resources not discussed in the prior CEQA documents for the Landfill Extension Project, result in
4 substantially more severe effects, or allow for the implementation of mitigation previously found to be
5 infeasible that would now be feasible.
6

7 **4.7 Hazards and Hazardous Materials**

8 **4.7.1 Setting**

9
10
11 The California Department of Forestry and Fire Protection (CAL FIRE) is the state agency responsible for
12 fire protection in State Responsibility Areas of California. CAL FIRE also identifies and maps fire risks
13 in Federal Responsibility Areas and Local Responsibility Areas. The County and City sides of the landfill
14 are located within very high fire hazard severity zones (CAL FIRE 2007, 2012). In addition to addressing
15 impacts associated with fire risk, the County and City CEQA documents also evaluated impacts
16 associated with hazardous materials due to construction and operation of the Landfill Extension Project
17 (City of Los Angeles 1997, County of Los Angeles 2006).
18

19 **4.7.2 Impacts and Mitigation**

20
21 The County identified mitigation measures and conditions to reduce fire risk and impacts that may occur
22 on fire protection services. The City's SEIR and Aliso Canyon Project EIR (see Section 1.5) made similar
23 findings and identified measures to reduce these impacts. The initial study for the SCAQMD SEIR
24 determined that there would be no impact from the SGPREP on fire risk or fire protection services
25 because of the mitigation, condition, and permit requirements already in place for activities at the landfill
26 (City of Los Angeles 1997, County of Los Angeles 2006, CPUC 2012c, SCAQMD 2012a).
27

28 SCE would implement the measures outlined in its Fire Prevention Plan approved by the CPUC to avoid
29 or reduce the risk of fire ignition from overhead electrical lines (CPUC 2013a)⁷ and CPUC General Order
30 95, Rules for Overhead Line Construction. Measures and conditions for implementation of the landfill's
31 Fire Prevention Plan, Emergency Action Plan, and Spill Response Program requirements and associated
32 mitigation measures, such as those for brush clearance, onsite water trucks, onsite fire hydrants, and
33 monitoring for landfill gas in excavated areas to avoid or reduce impacts from fire or explosion (see
34 Attachment A), would further ensure that impacts on fire risk and from hazardous materials during
35 construction and operation of the Proposed Project would be less than significant.
36

37 Therefore, given implementation of SCE's approved Fire Prevention Plan (CPUC 2013a) and the
38 comprehensive list of mitigation, condition, and permit requirements for landfill construction and
39 operation activities including the installation of Structures 5 through 16 (see Attachment A), the Proposed
40 Project would not result in one or more significant effects with regard to hazards and hazardous materials
41 not discussed in the prior CEQA documents for the Landfill Extension Project, result in substantially
42 more severe effects, or allow for the implementation of mitigation previously found to be infeasible that
43 would now be feasible.
44

⁷ In January 2012, the CPUC adopted an Order Instituting Rulemaking to revise and clarify CPUC regulations regarding electric utility infrastructure safety. The decision required SCE to prepare and submit plans for approval that, when implemented, would reduce the risk of fire caused by electrical utility lines.

4.8 Geology, Soils, Hydrology, and Water Quality

4.8.1 Setting

The landfill is located within a seismically active area. Segments of the Sierra Madre Fault Zone extend to the landfill that may have been active in the *Holocene* to *Historic* periods—periods that span from 10,000 years ago to the present (USGS 2000). The County and City CEQA documents identify seismic hazards that may occur within the landfill, including fault rupture and strong ground shaking. Landslide, liquefaction, erosion and sedimentation, changes to drainage patterns, and effects on surface water and groundwater quality may also occur (City of Los Angeles 1997, County of Los Angeles 2006, SCAQMD 2012a).

The existing water resources and drainage from the landfill site were described in detail in the surface water and groundwater sections of the County EIR and City SEIR (City of Los Angeles 1997, County of Los Angeles 1989). Baseline conditions at the landfill regarding surface water and groundwater were last updated in the County’s 2004 addendum. The landfill is located within the Sunshine Canyon watershed within the greater Las Angeles River Watershed. Drainage in Sunshine Canyon ultimately converges at the mouth of the canyon (near the landfill entrance) and exits the site into local flood control channels. Because of the high concentrations of salt and low yield, groundwater at the landfill is not used as a source of drinking water. The evaluation documented in the County’s 2004 addendum did not identify new information or changes requiring substantial modifications to the prior CEQA documents (County of Los Angeles 2004).

4.8.2 Impacts and Mitigation

The County identified a number of mitigation measures and conditions to reduce impacts associated with geology, soils, hydrology, and water quality. The City’s SEIR and Aliso Canyon Project EIR (Section 1.5 of this Addendum) made similar findings and identified measures to reduce these impacts. The SCAQMD SEIR determined that there would be no significant impacts associated with geology, soils, hydrology, or water quality because of California building code requirements for seismically active areas and the mitigation, condition, and permit requirements already in place for activities at the landfill (City of Los Angeles 1997, County of Los Angeles 2006, CPUC 2012c, SCAQMD 2012a).

Measures and conditions requiring the implementation of grading, drainage, erosion control, and structural and seismic design plans, as approved by the RWQCB, County, and City, include those for surface drainage control facilities to ensure runoff does not contact refuse and groundwater protection facilities including a groundwater extraction trench/cut-off wall; a landfill gas collection/treatment and flaring system; a leachate collection, treatment, and removal system; a landfill liner system; and ongoing water quality monitoring (see Attachment A). These existing measures and conditions would ensure that impacts due to construction and operation of the Proposed Project would be less than significant. In addition, the landfill’s SWPPP as modified for the Proposed Project or a new SWPPP specific to the Proposed Project would be implemented as described in Section 2.4.2 of this Addendum.

In addition, SCE would design footings for the proposed 66-kV structures based on the findings from a geotechnical analysis to minimize the potential for effects from landslide, lateral spreading, subsidence, liquefaction, or collapse, each of which may occur due to seismic activity (see Attachment B). Therefore, given the comprehensive list of mitigation, condition, and permit requirements for landfill construction and operation activities including the installation of Structures 5 through 16 (see Attachment A), the Proposed Project would not result in one or more significant effects with regard to geology, soils, hydrology, or water quality not discussed in the prior CEQA documents for the Landfill Extension

1 Project, result in substantially more severe effects, or allow for the implementation of mitigation
2 previously found to be infeasible that would now be feasible.
3

4 **5.0 Conclusion**

5
6 This Addendum discusses prior environmental review conducted pursuant to CEQA for the Landfill
7 Extension Project and describes and evaluates proposed changes to the Landfill Extension Project for the
8 relocation of a segment of SCE's 66-kV Line that crosses the landfill. Associated environmental reviews
9 completed for the Aliso Canyon Project are also discussed. As shown in this Addendum, the additions to
10 the Final County EIR for the Landfill Extension Project necessary to include the Proposed Project would
11 not result in a substantial increase in the severity of a previously identified significant effect, new
12 significant effects, or findings that new or modified mitigation measures or alternatives would reduce one
13 or more significant effects of the Proposed Project.
14

15 Therefore, the CPUC has determined that an addendum as defined by CEQA Guidelines Section 15164 is
16 the appropriate type of document to evaluate the proposed changes to the Landfill Extension Project
17 because none of the conditions calling for the preparation of a subsequent EIR, supplemental EIR, or
18 subsequent negative declaration as specified by Public Resources Code Section 21166 or CEQA
19 Guidelines Sections 15162 and 15164 would occur. The contents of this Addendum constitute the
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21

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Attachment A

**Mitigation Measures,
Conditions of Approval, and
Permit Requirements Summary**

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Mitigation Measures, Conditions of Approval, and Permit Requirements Summary

The County of Los Angeles (County) and City of Los Angeles (City) and other agencies have adopted mitigation, condition, and permit requirements that apply to construction and operation activities conducted at Sunshine Canyon Landfill (the landfill). Refer to Sections 1.3 and 3.2 of the accompanying Addendum. All of these requirements still apply and may have direct or indirect application to the project changes associated with the proposed segment of the Chatsworth–MacNeil–Newhall–San Fernando 66-kV Subtransmission Line (66-kV Line) to be relocated (the Proposed Project). These requirements will be imposed to the extent they are applicable.

The California Public Utilities Commission (CPUC) has reviewed the adopted mitigation, condition, and permit requirements and identified those that are most applicable to the Proposed Project. These requirements are summarized in Table 1. As discussed further below, the CPUC has also determined that certain mitigation, condition, and permit requirements do not apply to the Proposed Project. The CPUC considered all potentially applicable mitigation, condition, and permit requirements adopted by the County, City, and other agencies, including but not limited to those identified in Table 1, when conducting the impact analysis presented in the accompanying Addendum.

Table 1 Overview of Mitigation Measures, Conditions of Approval, and Permit Requirements Applicable to Relocation of Southern California Edison Company's 66-kV Subtransmission Line Segment that Crosses Sunshine Canyon Landfill

Requirement Description	Applicability	Requirement Source
Biological Resources		
Preconstruction/Prior-to-Grading Surveys and Wildlife Occurrence Requirements (e.g., for coastal California gnatcatcher, least Bell's vireo, raptors, and western burrowing owl)	Maintain compliance with established landfill requirements	County applicable MMRS Section 4.0 Measures including MMRS Measures 4.30 through 4.34 City MRMP Section 4.4.1 Measures
Biological and Horticultural/Forestry Monitoring	Monitor 66-kV construction and maintenance activities at the landfill to ensure compliance with established landfill requirements	County IMP Section VI Measures and MMRS Section 4.0 Measures timed to occur throughout landfill operations or on an ongoing basis including MMRS Measures 4.08 and 4.09 City COA Q-A3
Venturan Coastal Sage Scrub Mitigation Plan	Maintain compliance with established plans and requirements	County MMRS Measures 4.27, 4.28, 4.29 City MRMP Section 4.4.1 Measures
Revegetation Requirements	Maintain compliance with established landfill requirements	County COAs 41 and 44; applicable MMRS Section 4.0 Measures including 4.36 through 4.39 and 4.41 City COAs Q-C8 and Q-C9; MRMP Section 4.4.1 Measures, Measures 4.2.11, 4.2.12
Vegetation/Habitat Clearing Restrictions (Breeding Season)	Maintain compliance with established landfill requirements	County applicable MMRS Section 4.0 Measures including MMRS Measures 4.33 and 4.34 City MRMP Section 4.4.1 Measures
Oak Tree Permit and Tree Removal Requirements	Maintain compliance with established landfill requirements	County applicable MMRS Section 4.0 Measures including 4.10 through 4.26 City COA Q-C7; MRMP Section 4.4.3 Measures

**Table 1 Overview of Mitigation Measures, Conditions of Approval, and Permit Requirements
Applicable to Relocation of Southern California Edison Company's 66-kV
Subtransmission Line Segment that Crosses Sunshine Canyon Landfill**

Requirement Description	Applicability	Requirement Source
Traffic and Transportation		
Traffic Performance Monitoring	Maintain compliance with established landfill requirements	County COA 61
Aesthetics		
Litter Control Program	Maintain compliance with established program and requirements	County COA 46 City COA Q-C6 City MRMP Section 4.9.3 Measures
Light Shielding	Maintain compliance with established requirements	County MMRS Measure 10.05 City MRMP Measure 4.6
Air Quality and Greenhouse Gases		
Equipment Specifications, Use, and Maintenance; Revegetation Requirements	Maintain compliance with established requirements for minimizing construction-period air quality impacts	County COA 51; County MMRS Measure 17.16 City MRMP Section 4.2.11 and 4.2.12 Measures Other SCAQMD Permitting
Air Quality Monitoring	Maintain compliance with established landfill requirements; ensure compliance with any adopted Corrective Action Plans for the landfill	County COAs 51 and 81; MMRS Measures 6.09 and 6.10 City COA Q-C10; MRMP Section 4.2.11 and 4.2.12 Measures Other SCAQMD Permitting
Fugitive Dust Program; Daily Watering of Active Construction Areas and Traveled Unpaved Roads	Maintain compliance with established programs and requirements	County COA 45; MMRS Measures 3.12, 6.01 through 6.05 City COA Q-C3; MRMP Section 4.2.11 and 4.2.12 Measures Other SCAQMD Permitting
Noise		
Operating Hours	Maintain compliance with established landfill requirements	County COA 29; MMRS Measure 9.01 City COA Q-B3
Cultural Resources		
Preconstruction/Prior-to-Grading Surveys	Maintain compliance with established landfill requirements	County MMRS Measure 5.01 City MRMP Section 4.19 Measures (All)
Archaeological and Paleontological Monitoring and Occurrence Requirements	Monitoring of 66-kV construction and maintenance activities at the landfill / Maintain compliance with occurrence protocols in accordance with established landfill requirements	County IMP Part VII Measures; COA 62; Section 5.0 MMRS Measures (all) City COA Q-A3; MRMP Section 4.19 Measures (all)
Hazards and Hazardous Materials		
Fire Prevention Plan, Brush Clearance, Emergency Action Plan, and Spill Response Program	Maintain compliance with established landfill requirements	County COA 54; MMRS Measures 12.01 through 12.03, 12.10, 12.14, 12.15, 13.11, and 16.09 City MRMP Section 4.9.4 and 4.14.1 Measures
Geology and Soils		
Plan Approval (Grading, Drainage, Erosion Control, Structural and Seismic Design) and Implementation	Maintain compliance with established landfill requirements and plans; County/agency approval of plans (new or revised) incorporating the 66-kV facilities to be relocated	County COA 37; MMRS Section 1.0 Measures timed to occur throughout landfill operations or prior to construction of engineered structures including 1.02, 1.11, 1.13, and 1.17 City COA Q-C4; MRMP Measures 4.1.1 through 4.1.6 Other ACOE and RWQCB Permitting

**Table 1 Overview of Mitigation Measures, Conditions of Approval, and Permit Requirements
Applicable to Relocation of Southern California Edison Company's 66-kV
Subtransmission Line Segment that Crosses Sunshine Canyon Landfill**

Requirement Description	Applicability	Requirement Source
Hydrology and Water Quality		
Plan Approval (Drainage, Erosion Control) and Implementation	Maintain compliance with established landfill requirements and plans including those for containment (liner) systems and leachate collection and removal systems and to prevent or correct potential or actual contamination that may affect groundwater quality, water conveyance, or water storage facilities	County COAs 38, 40, and 42; IMP Part VIII; MMRS Section 2.0 Measures timed to occur throughout landfill operations or prior to commencement of associated activity, MMRS Measures 3.06 and 3.14 City MRMP Section 4.3.1 and 4.3.2 Measures Other ACOE and RWQCB Permitting
Other		
Permits, Approvals, and Findings Issued by Government Agencies or Departments	Ensure all 66-kV facilities at the landfill are developed, maintained, and operated in full compliance with City and County LEA, RWQCB, SCAQMD, CDFW, ACOE, CDHS, and other agency requirements for the landfill	County COA 7
Recycling and Negligent Disposal	Maintain compliance with established landfill requirements	County COAs 24 and 28 City COA Q-B5
Reclaimed Water Use and Water Conservation	Maintain compliance with established landfill requirements	County MMRS Measures 15.11 and 15.12 City MRMP Measure 4.16.4
Equipment Cleaning, Vector Reduction Measures	Maintain compliance with established landfill requirements	County COAs 47 and 56; MMRS Measures 4.45 through 4.50 and 18.12 City MRMP Section 4.9.2 Measures
Methane Gas Detection, Abandoned Wellheads	Maintain compliance with established landfill requirements	County MMRS Measures 7.05 and 16.13 City MRMP Section 4.9.6 Measures
Annual Reporting, Video Monitoring, Closure and Postclosure Maintenance Plan	66-kV facility construction and operations included in annual landfill reporting, video monitoring, and closure and postclosure maintenance plans	County IMP Part X; MMRS Measures 2.06, 4.36, and 17.17 City COAs Q-A6, Q-A7, and Q-C14; MRMP Measure 4.3.2

Sources: City of Los Angeles 1999a, 1999b, County of Los Angeles 2006b, 2007a, 2007b

Acronyms: ACOE = United States Army Corps of Engineers, CDFW = California Department of Fish and Wildlife, CDHS = California Department of Health Services, LEA = Local Enforcement Agency, RWQCB = Regional Water Quality Control Board, SCAQMD = South Coast Air Quality Management District

Key: County MMRS Measure = mitigation measure as defined in County Mitigation Monitoring and Reporting Summary (County of Los Angeles 2006b); County COA = condition of approval as defined in County Conditional Use Permit (County of Los Angeles 2007a); County IMP Measure = mitigation measure as defined in County Implementation and Monitoring Program Measure (County of Los Angeles 2007b); City MRMP Measure = mitigation measure as defined in City Mitigation Reporting and Monitoring Program (City of Los Angeles 1999a); City COA = condition of approval as defined in City General Plan Amendment and Zoning Change Approval (City of Los Angeles 1999b)

Inapplicable Requirements

Specific mitigation, condition, or permit requirements, or parts thereof, already fully implemented would not apply to construction or operation of the Proposed Project. Further, those requirements that pertain solely to landfilling operations would not apply to the Proposed Project. Examples include requirements for the purchase and dedication of recreational and preservation lands (County MM-214 and MM-215/MMRS Measures 4.01, 4.02, and 4.04); deposit of funds or completed installations for intersections and roadways (County COAs 57, 58, 59, and 60; City COAs T-5 and T-6; City MRMP Section 4.13.1, 4.13.4, and 4.13.6 Measures); \$432,000 of survey funding for Significant Ecological Areas (County MMRS Measure 4.05). Additionally, enclosed building design requirements (City MRMP Section 4.16.1 Measures) would not apply because no enclosed buildings are proposed in connection with the Proposed Project (City of Los Angeles 1999a, 1999b, County of Los Angeles 2006a, 2006b, 2007a).

The South Coast Air Quality Management District's adopted measures and conditions documented in the Findings, Statement of Overriding Considerations, and Mitigation, Monitoring and Reporting Plan for the SGPREP (SCAQMD 2012b) would also not apply to the Proposed Project because those measures and conditions are specific to the changes to the landfill associated with the SGPREP.

Attachment B

**Summary of Applicant
Commitments**

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Summary of Applicant Commitments

The applicant, Southern California Edison (SCE), has committed to implementing specific measures and practices for constructing and operating the proposed 66-kV subtransmission line segment relocation (Proposed Project), as described in the Proponent's Environmental Assessment (PEA) and in supplemental information provided to the CPUC after submittal of the PEA. The applicant commitments go above and beyond the obligations imposed by applicable mitigation, condition, and permit requirements described in the Addendum and Attachment A and are considered part of the design of the Proposed Project, incorporated to avoid or reduce the potential for residual impacts. Commitments made by SCE to minimize environmental effects of the Proposed Project include the following:

1. Restrict all construction activities to areas within the permitted grading limit of the landfill.
2. Minimize indirect impacts on habitat and special-status species that may occur near the Proposed Project site by restricting construction activities to existing disturbed areas. Flagging and/or fencing will be installed, as necessary, between the work area and native vegetation to be avoided.
3. Design the subtransmission poles to be raptor-safe consistent with the *Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006* (Avian Power Line Interaction Committee, 2006 [California Energy Commission Document CEC-500-2006-022]).
4. Deliver materials by truck only during off-peak traffic hours (prior to 7 a.m. and after 9 a.m. and prior to 4 p.m. and after 6 p.m., Monday through Friday) and that fall within the landfill's permitted hours of operation (including Saturday hours); deliveries would not be made during heavy traffic periods at the landfill including 9 a.m. to 10 a.m. and 12 p.m. to 1:30 p.m. (Monday through Friday).
5. Use helicopters (wire stringing) only during daylight hours between 7:00 a.m. and 7:00 p.m. (Monday through Saturday).
6. Design the footings for the subtransmission line based on the findings of SCE's geotechnical analysis to minimize the potential for landslides, lateral spreading, subsidence, liquefaction, or collapse.
7. Remove all construction materials and debris from construction sites and recycle or properly dispose of them in accordance with all laws, ordinances, and regulations and conducting a final inspection to ensure that cleanup activities were successfully completed.
 - See also the existing County of Los Angeles and City of Los Angeles measures and conditions identified on Attachment A for litter control at the landfill.
8. Use engines that meet the California Tier 3 off-road compression-ignition (diesel) engine certification standards (Title 13, California Code of Regulations, Section 2423) for construction of the Proposed Project. If not available, SCE would use engines that meet California Tier 2 off-road compression-ignition certification standards.
9. Implement, prior to start of construction, a Worker Environmental Awareness Program based on the final engineering design and results of preconstruction surveys. A presentation would be prepared by SCE and shown to all site workers involved with the construction of SCE's Proposed Project prior to their starting work. A record listing all trained personnel would be kept with the construction foreman. In addition to instructions for compliance with any site-specific biological

or cultural resource protective measures, all construction personnel would also receive the following:

- A list of phone numbers of SCE personnel associated with the Proposed Project (archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator);
 - Direction that site vehicles must be properly muffled;
 - A brief overview of biological, cultural, and paleontological resources and any other applicable mitigation measures;
 - Instruction regarding sensitive cultural, paleontological, and biological resources located within the vicinity of the project location, what the resources look like, and what to do if a sensitive resource is discovered during construction;
 - Instruction regarding individual responsibilities under the Clean Water Act and site-specific BMPs and the location of the Material Safety Data Sheets for the Proposed Project;
 - Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination;
 - A copy of the truck routes to be used for material delivery;
 - Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the Proposed Project; and
 - An overview of any applicable landfill operations procedures that fall under the Proposed Project's construction activities. Training materials will be provided by Republic.
10. If construction activities take place during the nesting season (typically February through August) and active burrows are discovered onsite, protective measures will be employed until the young have fledged. Active burrows in adjacent habitats will receive the same avoidance measures as other raptor nests. Burrowing owls will be excluded from all active burrows that may be destroyed by project activities in the immediate area through the use of exclusion devices placed in accordance with California Department of Fish and Wildlife protocols.
- See also the existing County of Los Angeles and City of Los Angeles measures and conditions identified on Attachment A that require Burrowing Owl surveys prior to onsite grading throughout landfill operations.
11. Conduct nesting bird and raptor surveys in areas where construction will occur within 500 feet of native vegetation during the nesting season (generally March 1 through August 31). If work is scheduled to take place within 100 feet of an active passerine nest or 500 feet of an active raptor nest, biologists would determine appropriate no-disturbance buffers based on a project-specific nesting bird management plan or consultation with the appropriate agencies. The buffer distance would be determined based on the species identified, activities proposed, level of existing noise, and line of sight from the disturbance to the nest.
- See also the existing County of Los Angeles and City of Los Angeles measures and conditions identified on Attachment A that impose preconstruction survey requirements and restrictions on vegetation and habitat removal throughout landfill operations.