

CALIFORNIA COASTAL COMMISSION

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Th13e

ADDENDUM

March 9, 2021

TO: Coastal Commissioners and Interested Parties

FROM: South Coast District Staff

SUBJECT: **ADDENDUM TO ITEM Th13e, Application No. 5-20-0197 (Los Angeles Department of Water and Power) for the Commission meeting of March 11, 2021.**

I. Changes to Staff Report

This addendum modifies the staff report dated February 26, 2021 with the following corrections and modifications on pages 1, 2, 3, 7, 10, 11, 17, and 20. Language to be added to the staff report is shown in underlined text and language to be deleted is identified by ~~strikethrough~~.

- a. **On page 1 of the staff report, the project description shall be corrected as follows:**

Project Description: Replace 38 wooden distribution poles with ~~38~~ 30 steel distribution poles along a 2.52-mile section of an existing transmission power line and related line work; request for after-the-fact approval of temporary vegetation clearance and grading of 1.41 acres of vegetation to and around access poles.

- b. **On page 1 of the staff report, the first sentence of the Summary of Staff Recommendation shall be corrected as follows:**

Los Angeles Department of Water and Power (LADWP) is proposing to do work on a section of existing transmission power line in Los Angeles County, consisting primarily of the replacement of wood poles with steel ~~poles~~ poles...

- c. On page 2 of the staff report, the last complete paragraph shall be corrected as follows:

The applicant now proposes to complete the pole replacement project. The proposed development in the coastal zone primarily involves removing 38 existing wooden distribution poles and replacing them with ~~38~~ 30 steel distribution poles...

- d. On page 3 of the staff report, the second complete paragraph shall be modified as follows:

Following completion of the pole replacement, the applicant will undertake restoration of the impacted habitat area as referenced in **Special Condition 1** which requires the applicant to submit a final restoration plan prior to issuance of this CDP. The applicant contends that no grading and no permanent impacts to ESHA are anticipated as a result of the construction activities, thus **Special Condition 1** requires the applicant to conduct pre- and post-construction vegetation surveys to document on-site vegetation. In addition, **Special Condition 1** requires the applicant to mitigate for any temporary impacts to ESHA at a 1:1 ratio and to mitigate for any permanent impacts to ESHA at a 3:1 mitigation ratio. If 3:1 mitigation is not feasible on site, then ~~an in-lieu mitigation fee amounting to \$33,874 per acre shall be required.~~ the 3:1 mitigation ratio for any permanent impacts to ESHA shall be implemented at a nearby location in the Santa Monica Mountains.

- e. On page 7 of the staff report, **Special Condition 1.C.a** shall be modified as follows:

C. Permanent impacts to ESHA.

- a. Any future permanent impacts to ESHA, including coastal sage scrub and chaparral, shall be mitigated on site at 3:1 ratio. If 3:1 mitigation is not feasible on site, then ~~an in-lieu mitigation fee amounting to \$33,874 per acre is required~~ the 3:1 mitigation ratio for any permanent impacts to ESHA shall be implemented at a nearby location in the Santa Monica Mountains.

- f. On page 10 of the staff report, the second complete paragraph shall be modified as follows:

The project site is located along Temescal Ridge Fire Road (fire road), which is a popular public access trail that allows visitors easy access to the Santa Monica Mountains and the Backbone Trail (a trail that allows visitors to traverse the Santa Monica Mountain range). The fire road is the main access road in the project area and maintenance of this road is typically conducted by the Los Angeles County City Fire Department, and Topanga State Parks, and by LADWP. LADWP only maintains the fire road at the request of City Fire Department or State Parks...

- g. On page 11 of the staff report, the first complete paragraph shall be corrected as follows:

LADWP proposes to fire-harden an existing utility line in the coastal zone by replacing 38 existing wooden poles with ~~38~~ 30 steel poles. Some of the existing

pole sites are currently double wood pole systems that will be replaced by single steel poles, therefore the proposed project will result in removal of 38 wood poles and installation of a total of 30 new steel poles...

- h. On page 11 of the staff report, the second complete paragraph shall be modified as follows:**

In order to implement the pole replacement project and to enable access to some pole work sites, LADWP requests after-the-fact approval of temporary vegetation clearance and grading of 1.41 acres of native habitat, all of which, in this location, is identified as ESHA. Within the 1.41 acres, the only grading authorized by this permit is for the minimum necessary grading needed at the pole sites and directly adjacent areas to establish access around each individual pole.

- i. On page 17 of the staff report, the first complete paragraph shall be corrected as follows:**

Proposed Project – The pole replacement project involves replacement of the existing wooden distribution poles with new steel poles. The applicant will use hand tools to excavate a hole for each of the ~~38~~ 30 new replacement poles in the coastal zone...

- j. On page 17 of the staff report, the second complete paragraph shall be corrected as follows:**

...The future footprint of ESHA impact has been minimized through pole-specific work site design for each of the ~~38 poles~~ pole sites. The total impact footprint is the cumulative total of proposed work at each of the pole-specific work sites in the coastal zone, so impacts to ESHA are avoided, or minimized as much as possible. The applicant would only use the existing fire road (not the widened portions)⁸ to access the distribution poles.

- k. On page 20 of the staff report, the last paragraph shall be modified as follows:**

For permanent impacts to ESHA, which, as explained above, are not anticipated as a result of the proposed pole replacement work, the mitigation ratio shall be 3:1. If 3:1 mitigation is not feasible on site, then ~~an in-lieu mitigation fee amounting to \$33,874⁹ per acre shall be required~~ the 3:1 mitigation ratio for any permanent impacts to ESHA shall be implemented at a nearby location in the Santa Monica Mountains.

- l. On page 20 of the staff report, footnote number 9 shall be eliminated:**

~~⁹ Although the proposed project is not under the jurisdiction of the Santa Monica Mountains LUP, it is appropriate to use the mitigation fee from its current Habitat Impact Fee Study (which is referenced in the May 2020 draft of the Santa Monica Mountains North Area Community Standards District) and amounts to \$33,874 per acre.~~