

Email: SCE Ivanpah Control

From: Rodriguez, Arlene <Arlene.Rodriguez@ladwp.com>
Sent: Monday, May 18, 2026 6:09 PM
To: Ivanpah-Control Project Team
Cc: Rubin, Katherine
Subject: RE: SCE Ivanpah-Control Project
Attachments: SCE Ivanpah-Control Project State Clearinghouse No. 2020-08-0553 - Draft EIR Comment Letter.pdf

Importance: High

Good evening, Mr. Forsythe,

Please see attached the revised comment letter package. It was brought to our attention that a portion of the comments reflected on Page 10/map attachment was inadvertently omitted from the previously transmitted signed version due to a computer/formatting glitch during final processing. The corrected page has now been incorporated and retransmitted for your records.

Apologies for any confusion, and please let us know if have any questions.

Best regards,

Arlene Rodriguez | Utility Executive Assistant – A
Corporate Environmental Affairs – Room 1050
Office: 213.367.4759 | Arlene.Rodriguez@ladwp.com
Cell: 213.605.2704

From: Rodriguez, Arlene
Sent: Friday, May 15, 2026 10:38 AM
To: Ivanpah-Control@aspeneg.com
Cc: Rubin, Katherine <Katherine.Rubin@ladwp.com>
Subject: SCE Ivanpah-Control Project

Good morning, Mr. Forsythe,

Please see attached correspondence from Ms. Katherine Rubin, Director of Corporate Environmental Affairs, regarding Southern California Edison Ivanpah – Control Project – State Clearinghouse No. 2020-08-0553 – Draft Environmental Impact Report Comment Letter.

Should you have any questions, please feel free to contact Ms. Rubin directly at (213) 367-0436.

Note: The attached is being sent in lieu of hard copy.

Best regards,

Arlene Rodriguez | Utility Executive Assistant to
Katherine Rubin, Director of Corporate Environmental Affairs
Corporate Environmental Affairs – Room 1050
Office: 213.367.4759 | Arlene.Rodriguez@ladwp.com
Cell: 213.605.2704



BUILDING A STRONGER L.A.

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May 15, 2026

Mr. John Forsythe
California Public Utilities Commission, Project Manager
c/o Aspen Environmental Group
235 Montgomery Street, Suite 967
San Francisco, CA 94104-2920
Ivanpah-Control@aspeneq.com

Dear Mr. John Forsythe:

Subject: Southern California Edison Ivanpah-Control Project – State Clearinghouse
No. 2020-08-0553 – Draft Environmental Impact Report Comment Letter

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (EIR) prepared by the California Public Utilities Commission (CPUC) to evaluate the potential environmental effects of Southern California Edison's (SCE; Requestor) application for a permit to construct, operate, and maintain the Ivanpah-Control Project (Proposed Project). The Proposed Project involves the removal, replacement, and continued operation of subtransmission facilities where operational safety issues have been identified along approximately 262 miles of SCE's existing 115-kilovolt (kV) subtransmission lines, many of which are over 100 years old. The purpose of the Proposed Project is to ensure compliance with CPUC safety standards by rebuilding all or portions of the existing 115-kV circuits.

Based on our review of the Draft EIR prepared for the Proposed Project, and evaluation of the Crater Mountain, Manzanar, and Fossil Falls Realignment Alternatives (Alternatives), which would impact land and/or facilities owned by LADWP, we respectfully submit the comments and conditions below.

Comments:

1. Requestor referenced herein shall pertain to its employees, agents, consultants, contractors, officers, patrons or invitees of the Requestor, or by any other Requestor's affiliated entities.

2. The information provided, to date, is inadequate for properly reviewing the proposed improvements within the project right-of-way. LADWP maintains existing facilities adjacent to this area that may be affected by the proposed development. LADWP therefore reserves the right to comment until more detailed information is provided regarding the Proposed Project. The Requestor shall provide a full set of project plans (Landscape, Civil, etc.) illustrating the proposed improvements. The plans should include Assessor Parcel Numbers, State Plane Coordinates, or use the Public Land Survey System to locate the developments impacting LADWP facilities.
3. Comments on the Alternatives figure are enclosed. The Requestor shall revise and resubmit a complete set of project plans, incorporating these comments, to LADWP for further review.
4. Plans may be submitted for review to LADWP's Real Estate Services Office via the following email: REOffice@ladwp.com and copy LADWP Corporate Environmental Affairs (CEA) at CorpEnvAffairs@ladwp.com and LADWP's CEA Environmental Planning and Assessment Group at ExternalProjectReview@ladwp.com.
5. The Proposed Project, including the Alternatives to the Proposed Project, would impact LADWP property or LADWP Transmission Line Right-of-Ways (TLRW), as such, the following stipulations are requested:
 - a. All technical reports and survey data that have been, or will be undertaken involving LADWP property shall be provided to LADWP, including but not limited to:
 - i. Biological surveys (e.g., focused or jurisdictional waters)
 - ii. Cultural resource or archaeological assessments
 - iii. Phase I/II environmental site assessments
 - iv. Geotechnical and hydrological reports
 - v. Air quality and noise technical studies
 - vi. Other relevant investigations
 - b. All cultural resources reports, archaeological/cultural site inventories, Geographic Information System data, and other applicable archaeological and cultural resource data collected from LADWP property shall be submitted to LADWP's Environmental Planning and Assessment Group, custodians of LADWP archaeological data.

Assessments for National Register of Historic Places eligibility shall also be submitted to LADWP.

- c. Data recovery plans for resources located on LADWP property shall be submitted to LADWP, in addition to CPUC and consulting tribes, for review and approval prior to implementation.
 - d. The Cultural Resources Management Plan shall be submitted to CPUC, Bureau of Land Management (BLM), LADWP, and consulting tribes for review and approval at least 90 days prior to the start of construction.
 - e. The Work Stoppage Plan for Previously Undiscovered Resources shall be submitted to LADWP, in addition to other parties, prior to approval and implementation. In the event that an avoidance buffer for previously unidentified resources encroaches on access routes utilized by LADWP, SCE shall immediately notify LADWP of the location and nature of the avoidance buffer to minimize interruptions to critical maintenance work.
 - f. Weekly monitoring reports for work taking place on LADWP property or LADWP's TLRW shall be submitted to LADWP.
6. Access to these materials is necessary to verify accuracy of property-specific data and conclusions, identify potential site-specific impacts, and support transparency and coordination between CPUC, BLM, SCE, and LADWP. Materials may be submitted to LADWP's Environmental Planning and Assessment Group via email at ExternalProjectReview@ladwp.com and copy the LADWP's CEA at CorpEnvAffairs@ladwp.com.
 7. Section 2.4.1.1, Material Yards, states that material yards will be used as reporting locations for workers, vehicle and equipment parking, material storage, helicopter staging, and house construction trailers for supervisory and clerical personnel. Many of the potential material yard locations described in the Draft EIR are used by area ranchers under ranch lease agreements. Further discussion with LADWP is necessary prior to material yards being formally identified. In addition to the material yards, any work areas described in Section 2.4.1.2, Work Areas, should not interfere with Lessees right to use their leased area.

8. Section 2.4.1.4, Access Roads and Spur Roads, details that new roads may be constructed from access roads to replacement structures. All access and maintenance of roadways must be approved by LADWP and formalized in a written agreement prior to the initiation of construction.
9. Figures 2-6a through 2-6e do not provide sufficient detail for an adequate review of potential material yard locations. Higher resolution figures for each material yard listed on Table 2-3 should be provided to impacted parties, including LADWP. Comments concerning specific locations are detailed below:
 - a. Material Yard 1-1: This 5.04-acre site is located within the Inyo County Bishop landfill. This property is leased by LADWP to Inyo County. SCE will need to coordinate with LADWP and Inyo County to utilize this location.
 - b. Material Yard 1-4: This 4.55-acre site is located at the southwest intersection of Big Pine Dump Road and Gregg Road south of Big Pine. This site is currently undisturbed and will be difficult to revegetate post use. SCE should consider relocating this site to the borrow pit approximately 1,400 feet west on Big Pine Dump Road. SCE will need to coordinate with LADWP for use of either site.
 - i. Section 3.2.2.2, Segment 1: Bishop to Inyokern, states that in response to Data Request 18-4, SCE mentioned that Material Yards 1-4 could be removed with minimal impact to construction. However, Section 2.4.1.1, Material Yards, states that until final engineering provides specific construction scheduling, SCE anticipates that each material yard could be used at any time and for any duration within the overall schedule of the Proposed Project and Material Yard 1-4 remains listed in Table 2-3, Potential Material Yard Locations. Removing Material Yard 1-4 from consideration would avoid this conflict.
 - c. Material Yard 1-6: This 3.62-acre site is located along the north side of Elna Road leading into LADWP Tinemaha Dam facility. Vegetation in this location is currently undisturbed. This location will be difficult to revegetate post use. SCE should consider relocating this site to a disturbed or developed location.

- d. Construction areas along the four-mile stretch between Tinemaha Dam and the LADWP aqueduct east of the Owens River will require access across the aqueduct through secure gates. SCE will need to coordinate with LADWP to gain access.
- e. Existing structures 238 to 240 are located in close proximity to a LADWP permanent vegetation monitoring plot on Taboose-Aberdeen Monitoring Site #5 associated with the Long-Term Water Agreement. This site cannot be impacted. SCE will need to coordinate with LADWP Watershed Resources staff to prevent impacts.
- f. Existing structure 245 and new structures are located in close proximity to a LADWP permanent vegetation monitoring plot on Taboose-Aberdeen Control Site associated with the Long-Term Water Agreement. This site cannot be impacted. SCE will need to coordinate with LADWP Watershed Resources staff to prevent impacts.
- g. Existing structure 354 is in close proximity to LADWP permanent vegetation monitoring plot on Independence-Oak Control Site #1 associated with the Long-Term Water Agreement. This site cannot be impacted. SCE will need to coordinate with LADWP Watershed Resources staff to prevent impacts.
- h. Material Yard 1-8: This 4.68-acre site is located at the southwest intersection of Black Rock Springs Road and North Coliseum Road. This site is a LADWP closed borrow pit regulated under the Surface Mining and Reclamation Act administered by Inyo County. The pit is in the reclamation phase of use. SCE may need to consider an alternate location or coordinate with LADWP and Inyo County to transfer reclamation responsibility.
- i. Construction areas from Blackrock Ditch to seven miles south are heavily infested with saltcedar (*Tamarix ramosissima*), United States Department of Agriculture plant code TARA. If saltcedar is planned to be cut in these locations LADWP recommends treating "cut stumps" with a solution of 25 percent Garlon-4 Ultra, 75 percent MSO Concentrate to prevent resprouting. Herbicide application to stumps should occur within 30 minutes of cutting.
- j. Material Yard 1-9: This 4.73-acre site is located south of Mazourka Canyon Road and west of the Los Angeles Aqueduct. This site is a

LADWP closed borrow pit regulated under the Surface Mining and Reclamation Act administered by Inyo County. The pit is in the reclamation phase of use. SCE may need to consider an alternate location or coordinate with LADWP and Inyo County to transfer reclamation responsibility.

- k. Material Yard 1-10: This 4.6-acre site is located on the Manzanar historical landing strip owned by LADWP. Damage to the airfield and associated landing strips must be prevented. SCE will need to coordinate with LADWP to permit use.
 - i. Section 3.6, Cultural Resources, states that National Park Service (NPS) staff at the Manzanar National Historic Site also expressed concern related to potential impacts that would result from SCE's proposed use of the Manzanar Airfield area for a material yard. Mitigation Measure CUL-1I, Avoid Damage to Manzanar Airfield, states that if Material Yard 1-10 cannot be eliminated, coordination and concurrence by NPS will be required. This measure should also include coordination with LADWP.
- l. Material Yard 1-11: This 4.87-acre site is located within the Inyo County Lone Pine landfill. This property is leased by LADWP to Inyo County. SCE will need to coordinate with LADWP and Inyo County to utilize this location.
- m. Material Yard 1-13: This 5.08-acre site is located south of Diaz Lake and east of Highway 395 and is leased by LADWP to Inyo County Public Works. This site is currently used as a borrow pit. SCE will need to coordinate with LADWP and Inyo County to utilize this location.
- n. Material Yard 1-14: Figure 2-6c on Page 2-87 is at a coarse scale and it is difficult to determine the exact location of this material yard. We assume this 4.9-acre site is located east of Cottonwood Creek and west of Highway 395. This property is leased by LADWP to the California Department of Transportation (Caltrans) and is currently used as a borrow pit. SCE will need to coordinate with LADWP and Caltrans to utilize this location.
- o. Material Yard 1-18: This 4.95-acre site is located adjacent to the LADWP South Haiwee power station. The site is partially disturbed but

is commonly flooded from water releases from First Los Angeles Aqueduct and Haiwee creek. SCE may want to seek an alternate location possibly south to the abandoned agricultural field. Both locations will require coordination with LADWP to utilize.

- p. Between mileposts 11 and 14, there is a rare plant population. SCE will need to coordinate with LADWP for specific information.
- q. Existing structure 355 intersects with an enhancement and mitigation project. SCE will need to coordinate with LADWP for specific information. The Manzanar Realignment Alternative would avoid this area.
- r. Between mileposts 43 and 47, there are rare plant populations. SCE will need to coordinate with LADWP for specific information. The Manzanar Realignment Alternative would avoid this area.

Conditions:

1. Requestor shall acknowledge that LADWP's TLRW are integral components of the transmission line system, which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the North American Electric Reliability Corporation, an organization of the Federal Energy Regulatory Commission. Safety and protection of critical facilities are the primary factors used to evaluate secondary land use proposals. The TLRW serves as a platform for access, construction, facility expansion and emergency operations. Therefore, the proposed use may, from time to time, be subject to temporary disruption caused by such operations.
2. Requestor shall be responsible for the maintenance of the Proposed Project area and shall keep the area in a neat and clean condition within LADWP's TLRW. It is our understanding that the Requestor will assume responsibility for maintenance of the Proposed Project improvements, and for all the risks and liabilities associated with Requestor's Proposed Project. LADWP will not be liable for any damage to the Proposed Project during LADWP's operation and maintenance activities.
3. No equipment over 14 feet high shall be used near the LADWP transmission lines without the written permission of LADWP. Equipment higher than 14 feet will require review from LADWP Transmission Engineering and/or Overhead Transmission (OHT). OHT is responsible for reviewing the proposed

equipment and staging areas. They can be contacted at (818) 771-5076 or (818) 771-5035.

4. No equipment shall be set up directly under the LADWP Transmission Lines.
5. No structures shall be constructed within LADWP's TLRW without prior approval of LADWP.
6. No grading shall be conducted within the LADWP's TLRW without prior written approval of LADWP.
7. Permanent entrances to LADWP patrol roads on either side of the Proposed Project area shall be kept clear and maintained at all times during the Proposed Project's construction.
8. All ground elevations within LADWP's TLRW are to remain unchanged from existing conditions after construction associated with the Proposed Project is completed. Cut and fill slopes inside LADWP's TLRW steeper than two horizontal to one vertical require retaining structures or geotechnical approval.

Note: Grading activity resulting in a vertical clearance between the ground and the transmission line conductor elevation less than 35 feet, or as noted in the CPUC, General Order No. 95 within LADWP's TLRW is unacceptable.

9. Requestor shall control dust by dust abatement procedures approved by LADWP, such as the application of dust palliative or water. Dust abatement procedures shall be submitted to LADWP's OHT Group for approval. They can be contacted at (818) 771-5076 or (818) 771-5035.
10. Ground cover for all below-ground utilities shall not be less than four feet within LADWP's TLRW.
11. Requestor is hereby notified that grounding wires may be buried in the right-of-way; therefore, Requestor shall contact a representative of LADWP's OHT Group at (818) 771-5076 or (818) 771-5035 at least 30 days prior to the start of any construction activities. A pre-construction meeting shall be scheduled.
12. If any modifications to LADWP's facilities are required to accommodate the Proposed Project, the Requestor will incur the associated costs.

Mr, John Forsythe
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May 15, 2026

13. If construction activities or equipment are located within 50 feet of LADWP transmission towers, Requestor shall install K-rails positioned 10 feet from each side of the tower base to protect the towers. A distance of five feet from the tower base may be acceptable in locations where patrol roads would be obstructed. Requestor shall be responsible for all associated costs.
14. If excavations are required, utility agencies within the proposed excavation sites shall be notified of impending work. Requestor shall be responsible for coordinating the relocation of utilities, if any, within the Proposed Project boundaries. Before commencing any excavations, Underground Service Alert (a.k.a. DigAlert) shall be notified.


The Requestor shall provide requested information before any developments are authorized within and/or adjacent to LADWP property or LADWP's TLRW. Additional conditions may be required following review of detailed site plans, grading/drainage plans, and requested materials.

This response shall not be construed as an approval of the Proposed Project or the Alternatives to the Proposed Project.

Should you have any questions, please feel free to contact me at (213) 367-0436 or Katherine.Rubin@ladwp.com.

Sincerely,

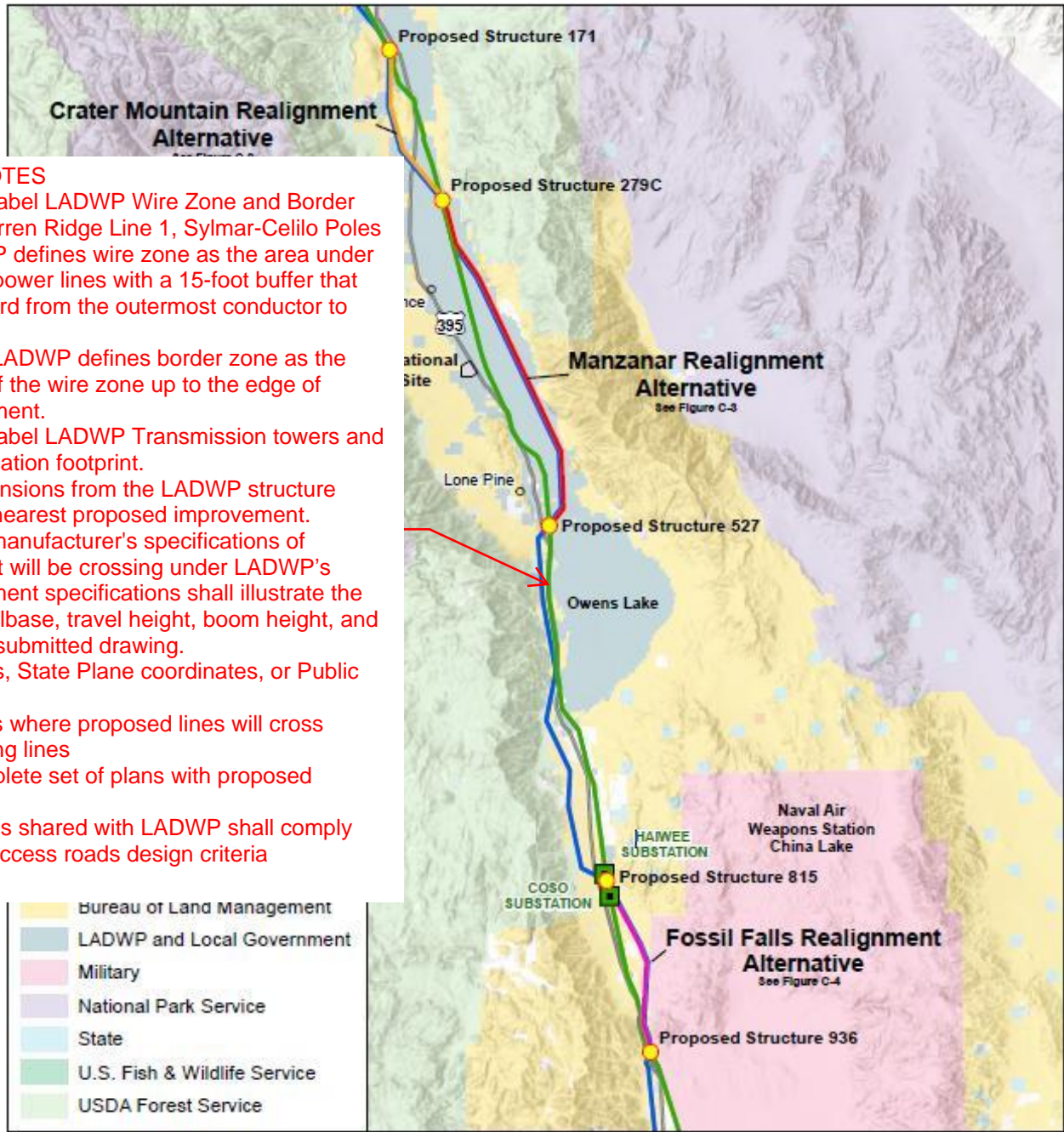
Katherine
Rubin

 Digitally signed by
Katherine Rubin

Katherine Rubin
Director of Corporate Environmental Affairs

JM:ea
Enclosures

Figure ES-2. Alternatives Retained



- GENERAL NOTES**
- Identify and label LADWP Wire Zone and Border Zone (Inyo-Barren Ridge Line 1, Sylmar-Celilo Poles 3 & 4). LADWP defines wire zone as the area under the overhead power lines with a 15-foot buffer that extends outward from the outermost conductor to provide a safety buffer. LADWP defines border zone as the area outside of the wire zone up to the edge of LADWP easement.
 - Identify and label LADWP Transmission towers and illustrate foundation footprint.
 - Provide dimensions from the LADWP structure footing to the nearest proposed improvement.
 - Provide the manufacturer's specifications of equipment that will be crossing under LADWP's TLRW. Equipment specifications shall illustrate the vehicle's wheelbase, travel height, boom height, and weight on the submitted drawing.
 - Include APNs, State Plane coordinates, or Public Land Survey
 - Identify areas where proposed lines will cross LADWP existing lines
 - Provide complete set of plans with proposed changes.
 - Access Roads shared with LADWP shall comply with LADWP access roads design criteria

Source: Aspen, 2024; BLM, 2024; CAL FIRE, 2024; ESRI, 2024; SCE, 2024.

Figure ES-2

Alternatives Retained

Proposed New Structure	Crater Mountain Realignment Alternative
Substation	Manzanar Realignment Alternative
Existing Ivanpah-Control 115 kV Line	Fossil Falls Realignment Alternative
LADWP Transmission Corridor (Pacific DC Intertie, LADWP Barren Ridge-Inyo 230 kV)	

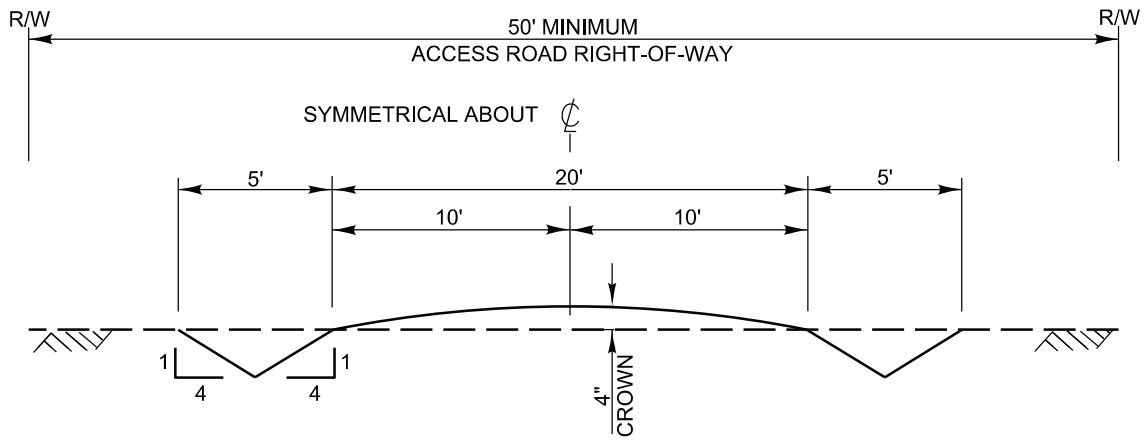
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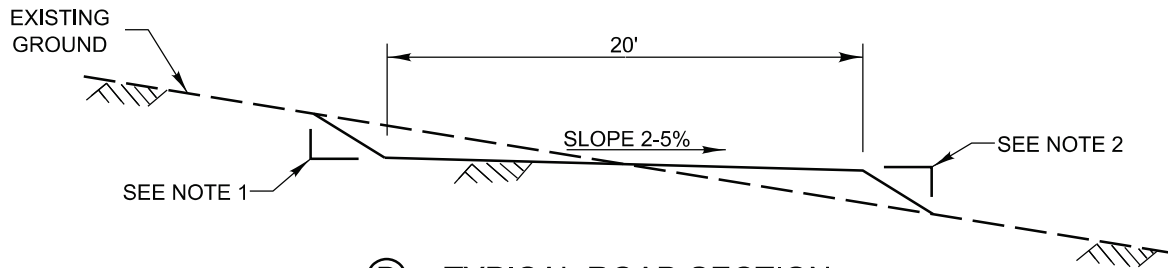
ACCESS ROAD DESIGN CRITERIA

1. When grading activity affects the Transmission Line access roads, the developer shall replace the affected access roads using the following access road design criteria. Typical Road Sections are illustrated in Attachment.
2. The access road right-of-way width shall be 50 feet minimum.
3. The access road drivable width shall be 20 feet minimum, and increased on curves by a distance equal to 400 divided by the radius of curve. Additional width on either side of the road shall be provided for berms and ditches, as detailed in the attached Typical Road Sections.
4. The minimum centerline radius of curves shall be 50 feet.
5. The vertical alignment grades shall be limited to 10 percent or paved at a maximum of 15 percent.
6. Roads entirely located on fills or with cross sections showing more than 30 percent fill along the drivable width of the road require paving.
7. Intersections or driveways shall have a minimum sight distance of 300 feet in either direction along the public street.
8. The developer shall provide a commercial driveway at locations where the replaced access roads terminate at, or cross public roads.
9. The developer shall provide lockable gates on LADWP property or easement at locations where access roads terminate or cross public roads.

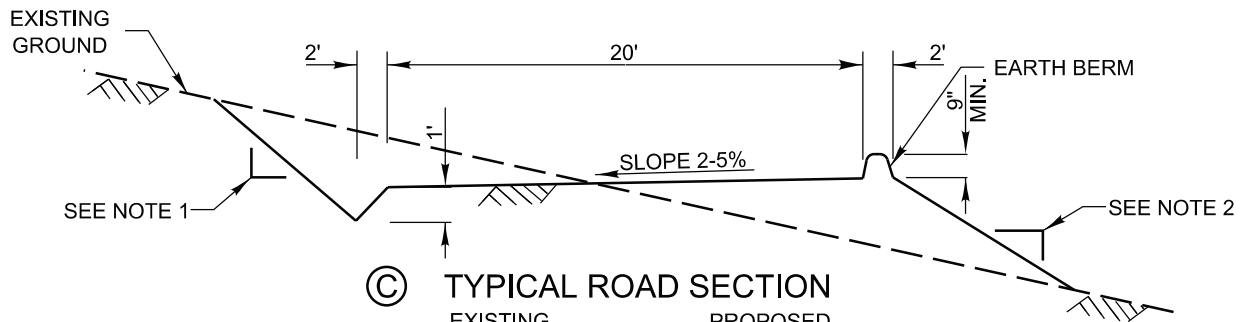
LOS ANGELES DEPARTMENT OF WATER AND POWER TRANSMISSION LINE ACCESS ROAD DETAILS



(A) TYPICAL ROAD SECTION
 EXISTING CROSS SLOPE $\leq 5\%$ PROPOSED ROAD GRADE $\leq 10\%$
 10-15% (PAVEMENT REQUIRED)



(B) TYPICAL ROAD SECTION
 EXISTING CROSS SLOPE 5-15% PROPOSED ROAD GRADE $\leq 10\%$
 10-15% (PAVEMENT REQUIRED)



(C) TYPICAL ROAD SECTION
 EXISTING CROSS SLOPE 15-50% PROPOSED ROAD GRADE $\leq 10\%$
 10-15% (PAVEMENT REQUIRED)

NOTES:

1. CUT SLOPE SHALL NOT EXCEED THE FOLLOWING:
 - A. 2 HORIZONTAL TO 1 VERTICAL IN LOOSE OR UNSTABLE MATERIAL.
 - B. 1 HORIZONTAL TO 1 VERTICAL IN COMPACTED MATERIAL.
 - C. 1/2 HORIZONTAL TO 1 VERTICAL IN SOLID ROCK.
2. ALL FILL SLOPES SHALL BE 2 HORIZONTAL TO 1 VERTICAL OR FLATTER.
3. WHERE SOLID ROCK IS ENCOUNTERED THE 4" CROWN AND, OR SIDE DITCHES MAY BE ELIMINATED WHERE DIRECTED BY THE ENGINEER.

STANDARD CONDITIONS FOR CONSTRUCTION

- 1) Energized transmission lines can produce electrical effects including, but not limited to, induced voltages and currents in persons and objects. Licensee hereby acknowledges a duty to conduct activities in such manner that will not expose persons to injury or property to damage from such effects.
- 2) The term "construction", as used herein, refers only to that construction incidental to the maintenance or repair of the existing (requested facility) and shall not be construed to mean permission to construct any additional (requested facility).
- 3) The right of way contains high-voltage electrical conductors; therefore, REQUESTER shall utilize only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following: State of California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders; and California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction.
- 4) Licensee shall neither hold the LADWP liable for nor seek indemnity from the LADWP for any damage to Licensee's project due to future construction or reconstruction by the LADWP within the right of way.
- 5) Licensee shall obtain and pay for all permits and licenses required for performance of the work and shall comply with all laws, ordinances, rules, orders, or regulations including, but not limited to, those of any agencies, departments, districts, or commissions of the State, County, or City having jurisdiction thereover. At any time prior to LADWP approval and during or after construction, LADWP may request permits and licenses obtained for the project for documentation.
- 6) The Los Angeles Department of Water and Power (LADWP) personnel shall have access to the right of way at all times.
- 7) Unauthorized parking of vehicles or equipment shall not be allowed on the right of way at any time.
- 8) Unauthorized storage of equipment or material shall not be allowed on the right of way at any time.
- 9) Fueling of vehicles or equipment shall not be allowed on the right of way at any time.
- 10) Fires and burning of materials are not allowed on the right of way.
- 11) Remote-controlled gates, or lock boxes containing the device or key for opening the remote-controlled gates, shall be capable of being interlocked with an LADWP padlock to allow access to the right of way by the LADWP. REQUESTER shall contact LADWP's Overhead Transmission Group at (818) 771-5076, or (818) 771-5035, to coordinate the installation of an LADWP padlock or LADWP can provide a lockbox if one can not be furnished by the Licensee.

- ~~12) Licensee shall post a sign on the entrance gate to the right of way, or in a visible location inside the entrance gate, identifying the contact persons name and telephone number for the prompt moving of (vehicles/trucks/trailers/containers) at times of LADWP maintenance or emergency activities, or any other event that (vehicles/trucks/trailers/containers) must be moved. In emergency conditions, the LADWP reserves all rights at any time to move or tow (vehicles/trucks/trailers/containers) out of specific areas for any transmission operation or maintenance purposes.~~
- 13) Licensee shall install K-rails at a distance of ten feet, from each side of the tower base for protection of towers. A distance of five feet from the tower base may be acceptable in locations where the patrol roads would be obstructed, upon review and approval from LADWP.
- 14) Licensee shall install removable pipe bollards, spaced four feet apart, and at a distance of ten feet from each side of the tower base for protection of towers. A distance of five feet from the tower base may be acceptable in locations where the patrol roads would be obstructed upon review and approval from LADWP.
- 15) Patrol roads and/or the ground surfaces of the right of way shall be restored by Licensee to original conditions, or better.
- 16) All trash, debris, waste, and excess earth shall be removed from the right of way upon completion of the project, or the LADWP may do so at the sole risk and expense of Licensee.
- 17) All cut and fill slopes within the right of way shall contain adequate berms, benches, and interceptor terraces. Revegetation measures shall also be provided for dust and erosion control protection of the right of way.
- 18) All paving, driveways, bridges, crossings, and substructures located within the right of way shall be designed to withstand the American Association of State Highway and Transportation Officials' vehicular loading H20-44 or HL-93. The design shall also comply with applicable design standards.
- 19) If any excavations are required, utility agencies within the proposed excavation sites shall be notified of impending work. Licensee shall be responsible for coordinating the relocation of utilities, if any, within the project boundaries. Before commencing any excavations, contact Underground Service Alert (a.k.a DigAlert).
- ~~20) The location of underground pipelines and conduits shall be marked at all points where they cross the boundaries of the right of way and at all locations where they change direction within the right of way. The markings shall be visible and identifiable metal post markers for underground pipelines. Utility markers flush with surface may be used on pavement.~~
- ~~21) Signs shall not exceed four feet wide by eight feet long, shall not exceed a height of 12 feet, shall be constructed of noncombustible materials, and shall be installed manually at, and parallel with, the right of way boundary.~~

22A) General Grounding Condition

All aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way shall be properly grounded and shall be insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with State of California Code of Regulations, Title 8, Section 2941, and National Electric Code, Article 25011B.

~~22B) Grounding Condition for Cellular Facilities on Towers~~

~~All aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way shall be properly grounded and shall be insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with American National Standards Institute of Electrical and Electronics Engineers Standard 487 latest edition, IEEE Guide for Safety in AC Substation Grounding.~~

23) Detailed plans for any grading, paving, and construction work within the right of way shall be submitted for approval to the Real Estate Services, 221 N. Figueroa St., Suite 1600, Los Angeles, California 90012, no later than 15 weeks prior to the start of any grading, paving, or construction work.

24) Requester shall provide dust-abatement/control procedures to be approved by the LADWP prior to commencement of work requiring soil disturbance, such as the application of a dust palliative or water.

~~25) Licensee's cathodic protection system, if any, shall have a design that does not cause corrosion to LADWP facilities. A detailed design of the Licensee's cathodic protection system shall be submitted for approval to the Real Estate Services, 221 N. Figueroa St., Suite 1600, Los Angeles, California 90012, or RE@ladwp.com, no later than 15 weeks prior to the start of construction or installation of the cathodic protection system.~~

26) Licensee is hereby notified that grounding wires may be buried in the right of way; therefore, the Licensee shall notify LADWP's Overhead Transmission Group at (818) 771-5076, or (818) 771-5035, at least 30 days prior to the start of any construction activities in the right of way.

27) In the event that construction within the right of way is determined upon inspection by the LADWP to be unsafe or hazardous to the LADWP facilities, the LADWP may assign a line patrol mechanic at Licensee's expense.

28) If the LADWP determines at any time during construction that Licensee's efforts are hazardous or detrimental to the LADWP facilities, the LADWP shall have the right to immediately terminate said construction.

29A) Vehicle Parking

An area within 50 feet around the edge of base of each tower must remain open and

unobstructed for maintenance and emergencies, including periodic washing of insulators by high-pressure water spray. Clearances of 100 feet may be required under circumstances where access is limited.

29B) Trucking Operations and Storage Operations

An area within 50 feet around edge of the base of each tower must remain open and unobstructed for maintenance and emergencies, including periodic washing of insulators by high-pressure water spray. Clearances of 100 feet may be required under circumstances where access is limited.

29C) Permanent Structures

An area within 100 feet on all sides of each tower shall remain open and unobstructed for maintenance and emergencies, including periodic washing of insulators by high-pressure water spray.

- 30) All concentrated surface water which is draining away from the permitted activity shall be directed to an approved storm drain system where accessible, or otherwise restored to sheet flow before being released within or from the right of way.
- 31) Drainage from the paved portions of the right of way shall not enter the unpaved area under the towers. Drainage diversions such as curbs shall be used on three sides of each tower. The open side of each tower shall be the lowest elevation side to allow storm water which falls under the tower to drain. The area under the towers shall be manually graded to sheet flow out from under the towers.
- 32) Ponding or flooding conditions within the right of way shall not be allowed, especially around the transmission towers. All drainage shall flow off of the right of way.
- 33) Licensee shall comply with all Los Angeles County Municipal Storm Water Permit and Standard Urban Storm Water Mitigation Plan requirements.
- ~~34) Licensee shall provide and maintain a minimum 20-foot wide transition ramp for the patrol roads from the pavement to the ground surface. The ramp shall not exceed a slope of ten percent.~~
- ~~35) Licensee shall provide and maintain a minimum 20-foot wide driveway and gate at all locations where the (road/street) crosses the LADWP's patrol roads. The designed gates must be capable of being interlocked with an LADWP padlock to allow access to the right of way by the LADWP.~~
- ~~36) Fills, including backfills, shall be in horizontal, uniform layers not to exceed six inches in thickness before compaction, then compacted to 90 percent relative compaction in accordance with the American Society for Testing and Materials D1557.~~
- ~~37) The top two inches to six inches of the concrete footings of the towers shall remain exposed and not covered over by any fill from grading operations.~~
- 38) Licensee shall provide the LADWP with one copy each of the compaction report and a Certificate of Compacted Fill, for clean fill compaction within the LADWP's right of way in accordance with the American Society for Testing and Materials D1557, approved and stamped by a geotechnical engineer licensed in the State of California.

- 39) "As Constructed" drawings showing all plans and profiles of REQUESTER's project shall be furnished to the Real Estate Services, 221 N. Figueroa St., Suite 1600, Los Angeles, California 90012, or RE@ladwp.com within five days after completion of REQUESTER's project impacting LADWP ROW. If "As Constructed" are not consistent with LADWP approved project plans, LADWP has right to reject future requests related to projects.