

Department of Water and Power



the City of Los Angeles

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November 28, 2005

Ms. Julia Souder
U.S. Department of Energy
Office of Electricity Delivery and
Energy Reliability
1000 Independence Avenue, S.W.
Washington, DC 20585

Dear Ms. Souder:

Subject: Comment on the September 28, 2005 Notice of Intent to Prepare a
Programmatic Environmental Impact Statement (PEIS) for
Designation of Energy Corridors on Federal Land in the 11 Western States

As the nation's largest municipal utility, the Los Angeles Department of Water and Power (LADWP) provides water and electricity to 3.9 million residents and businesses in a 465-square-mile area of Los Angeles. To serve these needs, LADWP owns and/or operates over 36,000 miles of electrical transmission lines throughout the Western United States.

In accordance with state requirements that public utilities develop a renewable energy portfolio standard, the Los Angeles City Council approved a resolution on June 29, 2004, supporting the concept of increasing the amount of energy LADWP generates from renewable power sources. These goals are generally consistent with state mandates for investor-owned utilities operating within California. This commitment to renewable sources is a means to provide sustainable energy resources that will reduce air pollutant emissions and dependence on fossil fuels for power generation.

Based on the approved October 2004 Load Forecast, annual growth in electricity peak demand in Los Angeles is expected to average approximately 1.3 percent, or an average of approximately 80 MW per year, over the next 16 years (from 2006 until 2021). It is estimated that between the years 2004 and 2010, electricity peak demand in the city will grow by approximately 560 MW, or approximately 10.3 percent (from 5,418 MW to 5977 MW).

The increased utilization of existing and the development of new electrical transmission corridors are critical to LADWP's commitment to expanding its renewable energy

Water and Power Conservation ... a way of life

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portfolio and supplying power to meet the increasing energy needs of Los Angeles. As such, LADWP supports the efforts described in the September 28, 2005 Notice of Intent to Prepare a PEIS for the designation of corridors for electricity transmission and distribution facilities on Federal land in the Western States, and would like to offer the following comments to be considered in the development of the Draft PEIS.

Alternatives to be Considered in the PEIS

LADWP recommends inclusion of the following projects during the development of alternatives in the PEIS:

Increased Utilization Alternative: Inyo – Rinaldi Transmission Line

To increase access to renewable energy wind resources in the Tehachapi Wind Resources Area, LADWP is proposing to upgrade or expand transmission capacity in an existing utility corridor within the Angeles National Forest and within Bureau of Land Management land in the Owens Valley. This project is in the initial stages of development, and the identification of project alternatives per the requirements of the National Environmental Policy Act and the California Environmental Quality Act is currently underway.

New Corridor Alternative: Los Angeles – Imperial Valley Transmission Line (Green Path Project)

As part of the Green Path Project proposed in conjunction with the Imperial Valley Irrigation District and Citizens Energy, LADWP is proposing the Los Angeles – Imperial Valley Transmission Line Project. (Please see the enclosed News Release regarding the proposed Green Path Project.) The proposed line would connect developing renewable energy sources, including geothermal, in the Imperial Valley to the LADWP system at either the existing Victorville substation or at a proposed new Upland substation.

The project is in the preliminary planning stages, and routing alternatives per the requirements of the National Environmental Policy Act and the California Environmental Quality Act are currently being identified and analyzed. The proposed alternatives would require new corridors through U. S. Forest Service or Bureau of Land Management lands. Please see the enclosed Los Angeles – Imperial Valley Transmission Line Project map for the location of this potential corridor identified for your consideration for a new corridor.

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Corridor Encroachment

In the western United States, regional utility corridors have been established to discourage right-of-way proliferation as well as secure long linear routes between resources and load areas. However, with increasing land use demands, encroachment into these corridors is occurring (i.e., Fort Irwin Expansion – San Bernardino County, California). If corridors are not protected, incompatible encroachment can create short distance pinch points, which can render long distance, regional corridors useless. Additionally, by reducing the width of corridors, utilities would be required to be sited adjacent to each other which during fires or other natural disasters could result in outages or disruptions of multiple utility services. As part of the PEIS, the adverse impacts of encroachments on existing and new corridors should be evaluated along with the development of guidelines to prevent the future reduction of utility corridor resources.

Impacts on Sensitive Species and Cultural Resources

As part of the identification of environmental issues, LADWP recommends that standard protocols be developed and incorporated into the PEIS to address impacts to sensitive species and cultural resources. The development of the protocols would provide consistent guidelines for use by local resource agencies when the potential exists for electricity transmission facilities to impact sensitive species or their habitat. As a result, project applicants would be able to prepare comprehensive studies for the agencies which would facilitate the timely completion of transmission projects.

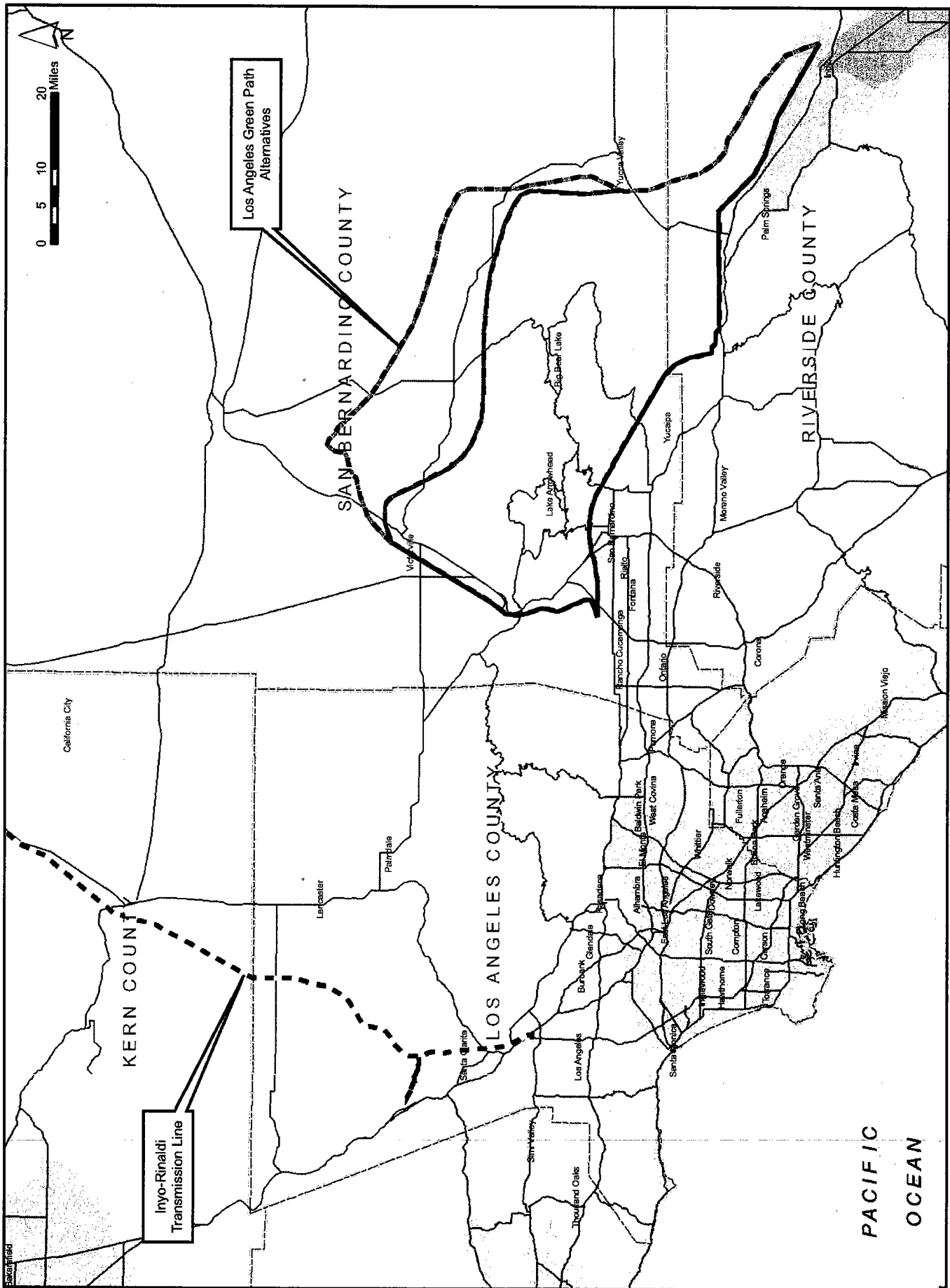
Thank you for your consideration of these comments. If you have any questions or would like further information, please contact Ms. Tanya Derivi, LADWP Legislative Representative, at (202) 347-0915 or Ms. Lillian Y. Kawasaki, Assistant General Manager of Environmental Affairs and Economic Development, at (213) 367-1981.

Sincerely,

*Original Signed by
Randy S. Howard for*

Enrique Martinez
Chief Operating Officer – Power System

SEP:gc
Enclosures
By fax (202-586-1472) and Federal Express
c: Ms. Tanya Derivi
Ms. Lillian Y. Kawasaki



Inyo-Rinaldi
Transmission Line

Los Angeles Green Path
Alternatives

0 5 10 20
Miles

California City

KERN COUNTY

SAN BERNARDINO COUNTY

LOS ANGELES COUNTY

RIVERSIDE COUNTY

PACIFIC
OCEAN

Lake Arrowhead

Lake Burbank

Victorville

San Dimas

Rialto

Fontana

Sancho Cucamonga

Ontario

Yuba Valley

Moreno Valley

Riverside

Corona

Palmdale

Lancaster

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Los Angeles Green Path

Los Angeles - Imperial Valley Transmission Line Project

Los Angeles Department of Water and Power

Alternative 1

Alternative 2

Alternative 3

Victorville-Century Upgrade

Native American Lands

Department of Defense

Bureau of Reclamation

National Park Service

US Forest Service

US Fish and Wildlife

Bureau of Land Management

California State Parks

California Department of Fish and Game

