David Balandran
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December 17, 2021

Eric Chiang
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: SCE's Responses to CPUC Deficiency Letter on the Application for a Permit to Construct: Control-Silver Peak Project and Proponent Environmental Assessment (PEA): A.21-08-009

Dear Mr. Chiang:

Please see the document titled TLRR CSP Project PEA Deficiency Batch #2 SCE Responses, included in this submittal for SCE's responses to the CPUC's September 15, 2021 PEA deficiency letter. The response matrix includes responses to the deficiencies SCE and the CPUC have agreed to as mid-term deficiencies. Further, SCE has identified deficiencies that request information beyond what is prescribed in the CPUC's *Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments,* and produces this information in the spirit of cooperation. SCE has targeted Q1/Q2 2022 for the submission date of the final batch, long-term deficiency responses.

SCE looks forward to working with your team to continue to process the Control-Silver Peak Project. Should you have any questions or concerns, please feel free to contact me at (626) 302-6734 or David.Balandran@sce.com.

Sincerely,

/s/ David Balandran

David Balandran
Senior Advisor, Regulatory Affairs
Southern California Edison Company

Enclosures

B: Where changes to PEA text are suggested by a noted deficiency, the relevant PEA text is provided in the Response/Modified Text column; text to be added is shown in red and underline, text to be deleted is shown in ~~red and strikethrough~~.

ID	PEA Section(s)	Deficiency	Response/Modified Text
Chapter 2: Introduction			
3-1	Section 3.2.1.1	**Existing Utility System** Identify and describe the existing utility system that would be modified by the proposed project, including connected facilities to provide context. Include detailed information about substations, transmission lines, distribution lines, compressor stations, metering stations, valve stations, nearby renewable generation and energy storage facilities, telecommunications facilities, controlsystems, SCADA systems, etc. Explain the system connectivity, relationship and function with power supply inNevada. If this information is located in other section of the Project Description, provide a cross-reference.	The CSP Project does not include any connected compressor stations, valve stations, nearby renewable generation, energy storage facilities, or non-SCE telecommunications facilities. SCE has, in the PEA, provided information on what features would be modified or changed under the CSP Project. SCE has not, in the PEA, provided information regarding non-Project infrastructure, as such infrastructure would not be changed or modified under the CSP Project. 3.2.1.1 Existing Utility System The CSP Project-related system is defined by the subtransmission lines on which discrepancies have been identified, and the substations that bound, or are found along, those portions of the subtransmission lines. Therefore, the CSP Project-related existing utility system comprises the following: • Circuits/Subtransmission Lines o Control-Silver Peak 'A' 55 kV Subtransmission Line o Control-Silver Peak 'C' 55 kV Subtransmission Line • Substations o Control Substation o Deep Springs Substation o Fish Lake Valley Metering Station o Metering Station CS 542 o White Mountain Substation6t o Zack Substation The Control Substation, Deep Springs Substation, White Mountain Substation, and Zack Substation all serve distribution circuit(s) emanating from those substations. These distribution circuit(s) would not be modified by the CSP Project. The existing 55 kV subtransmission lines do not have telecommunication infrastructure installed; the substations included in the CSP Project are connected to SCE's Supervisory Control and Data Acquisition (SCADA) system by a variety of means, including satellite communications, radio, microwave communications, and telephone lines. These means would not be modified by the CSP Project. The Control-Silver Peak 'A' and 'C' 55 kV subtransmission lines are joint-owned: those portions located in the State of California are owned and operated by SCE, and those portions located in the State of Nevada are owned and operated by Nevada Energy (NV Energy). Collectively, these lines form the WECC Path 52. This path has a bi-directional rating of 17 MW and serves to provide supporting services to both SCE and NV Energy based on their respective system needs including, but not limited to, load services and system reliability. In general, the power flow is east to west (from the NV Energy system to the SCE system).
3-2	Section 3.2.1.2	**Existing Users and Service Area** Identify the existing users served by the existing system features.	3.2.1.2 Users and Area Served by the Existing Utility System The subtransmission lines included in the CSP Project do not directly serve any users. The CSP Project would not provide service to any new users or areas; the existing users and areas served by the infrastructure included under the CSP Project would continue to be served by the replacement infrastructure.

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			The existing users served by the existing system features include those customers served from the Control, Deep Springs, White Mountain, and Zack substations; all substations located downline from these substations and the Fish Lake Valley Metering Station; and all users served from NV Energy's Silver Creek Substation and all substations located downline from this substation.
3-11	Section 3.4.2	**Existing Right-of-Ways and Easements** Existing right-of-way (ROW) and easement requirements need to be clearlydescribed in the PEA. ▪ Identify and describe existing ROWs or easements where project components would be located. Provide the approximately lengths and widths in each project segment. ▪ Provide associated GIS data for existing ROWs and easements.	***3.4.2.1 Existing Rights-of-Way or Easements: Identification and Description*** Existing ROWs or easements are found across the length of the CSP Project alignment. SCE currently holds existing easements over approximately 19.7 miles of the CSP alignment where work that will be performed under the CSP Project located on BLM-managed lands. The width of these easements range from 20 to 100 feet. SCE currently holds existing easements over approximately 43.3 miles of the CSP alignment where work that will be performed under the CSP Project located on USFS-managed lands. The width of these easements range from 80 to 100 feet. SCE currently holds existing easements over approximately 3.6 miles of the CSP alignment where work that will be performed under the CSP Project located on LADWP-owned lands. The width of these easements range from 20 to 100 feet. SCE currently holds existing easements over approximately 4.2 miles of the CSP alignment where work that will be performed under the CSP Project located on private and county lands. The width of these easements range from 20 to 100 feet. Portions of each Segment are located within or cross over areas within franchise.
3-12	Section 3.4.3	**New or Modified ROWs and Easements** Proposed right-of-way (ROW) and easement requirements need to be clearly described in the PEA. ▪ Describe new permanent or modified ROWs or easements that would be required. Provide the approximately lengths and widths in each project segment. ▪ Provide associated GIS data for new permanent or modified ROWs and easements.	***3.4.3.1 New Permanent or Modified ROWs or Easements that are Required*** Along some portions of the CSP Project alignment, SCE currently does not have an easement or ROW for the CSP Project subtransmission lines. In these areas, SCE will obtain new easement or ROW as follows: • On BLM-managed lands in Segment 1, SCE will obtain new permanent easements over approximately 1.5 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 50 feet in width. • On BLM-managed lands in Segment 3, SCE will obtain new permanent easements over approximately 1 mile of the CSP alignment where work that will be performed under the CSP Project; these easements will be 85 feet in width. • On BLM-managed lands in Segment 5, SCE will obtain new permanent easements over approximately 1.1 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 70 feet in width. • On USFS-managed lands in Segment 3, SCE will obtain new permanent easements over approximately 0.2 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 85 feet in width. • On LADWP-managed lands in Segment 1, SCE will obtain new permanent easements over approximately 4.7 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 50 feet in width. • On LADWP-managed lands in Segment 2, SCE will obtain new permanent easements over approximately 2.9

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			miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 70 feet in width. • On LADWP-managed lands in Segment 3, SCE will obtain new permanent easements over approximately 2.9 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 85 feet in width. • On LADWP-managed lands in Segment 4, SCE will obtain new permanent easements over approximately 8.4 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 70 feet in width. • On private and county lands in Segment 1, SCE will obtain new permanent easements over approximately 0.3 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 50 feet in width. • On private and county lands in Segment 3, SCE will obtain new permanent easements over approximately 1.8 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 85 feet in width. • On private and county lands in Segment 4, SCE will obtain new permanent easements over approximately 1.2 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 70 feet in width. • On private and county lands in Segment 5, SCE will obtain new permanent easements over approximately 1 mile of the CSP alignment where work that will be performed under the CSP Project; these easements will be 70 feet in width. Along some portions of the CSP Project alignment, SCE currently has an easement or ROW for the CSP Project subtransmission lines that is not sufficiently wide to accommodate the infrastructure proposed by the CSP Project. In these areas, SCE will obtain new easement or ROW to result in a wider easement or ROW as follows: • On BLM-managed lands in Segment 3, SCE will obtain new permanent easements over approximately 8.7 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 85 feet in width. • On BLM-managed lands in Segment 4, SCE will obtain new permanent easements over approximately 2.5 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 70 feet in width • On LADWP-owned lands in Segment 3, SCE will obtain new permanent easements over approximately 3.2 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 85 feet in width. • On LADWP-owned lands in Segment 4, SCE will obtain new permanent easements over approximately 0.4 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 70 feet in width. • On private and county lands in Segment 3, SCE will obtain new permanent easements over approximately 0.3 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 85 feet in width. • On private and county lands in Segment 5, SCE will obtain new permanent easements over approximately 0.3 miles of the CSP alignment where work that will be performed under the CSP Project; these easements will be 70 feet in width. The existing rights-of-way on BLM lands are generally 80 feet wide. The existing easements on USFS lands are 80 to 100 feet wide. The existing easements on LADWP lands range from 20 to 100 feet wide. Easements over private lands

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			vary in width from 20 feet to 100 feet.
3-13	Section 3.5	**Construction Materials** Provide a section describing the materials need for construction and estimatequantities (e.g., import fill, aggregate for road base, concrete).	The potential volume of imported fill cannot be estimated at this time; however, SCE generally does not anticipate importing fill, but rather utilizing spoils generated on-site as fill as necessary. SCE will be performing an inspection of the CSP ROW following snowmelt in early 2022; such material needs if not described in the PEA currently may be identified during that inspection. No aggregate for road base is anticipated to be required. The range of volumes of concrete anticipated to be used for the installation of TSPs and TSP H-frames, and the number of TSPs and TSP H-frames anticipated to be installed under the CSP Project, is provided in Table 3.3-2, allowing for an easy quantification of the estimated quantity of concrete to be used during the CSP Project.
3-14	Section 3.5.1.1.1 Table 3.5-1	**Existing Access Roads: Widths** The access road in upper Silver Canyon is narrow (10 feet wide in some stretches)with some significant tight and steep switchback turns. Provide the width that segment of road would be modified to and the minimal radius turn needed to be accommodate the vehicles anticipated as listed in Table 3.6-1.	SCE will perform an inventory of such areas in 2022. Note that in many locations, widening is infeasible and alternate construction methods or equipment would be utilized in these areas.
3-15	Section 3.5.1.1.2	**Existing Access Road Modifications** The extent and scope of the existing road rehabilitation needs to be assessed atthis time, barring unforeseen conditions that could result from slides, washouts, orother slope failures. Provide additional details on the items below including the exact location, dimension (lengths and widths), disturbance area, and any necessary improvements (e.g., gravel placement). ▪ Widening of the existing roadbed at curves and other locations. ▪ Installation of new, or repair of existing, wet crossings, water bars, overside drains and pipe culverts to allow for construction traffic usage, as well as to prevent road damage due to uncontrolled water flow. Provide a description of the type of matting proposed as part of roadrehabilitation.	Early-season snow fall has prevented SCE from performing an inventory of potential access road rehabilitations this year. SCE, as part of its routine non-Project access road maintenance program, is going to perform road maintenance next year following the snowmelt. The CSP Project Team will perform its road rehabilitation inventory after that road maintenance work, and the CSP Project Team will communicate to the CPUC the expected road rehabilitation/culvert protection/etc. activities at some point in the June/July 2022 timeframe.
3-17	Section 3.5.1.4.2	**Bridge or Culvert Replacement or Installation** Locations where new or replacement culverts are necessary as part of access rehabilitation need to be identified in the PEA. Include estimated culvert sizing foreach location and preliminary site-specific or standard design details for culvert installation.	Early-season snow fall has prevented SCE from performing an inventory of potential access road rehabilitations this year. SCE, as part of its routine non-Project access road maintenance program, is going to perform road maintenance next year following the snowmelt. The CSP Project Team will perform its road rehabilitation inventory after that road maintenance work, and the CSP Project Team will communicate to the CPUC the expected road rehabilitation/culvert protection/etc. activities at some point in the June/July 2022 timeframe.
3-23	Section 3.5.4.4	**Tree Trimming Removal** Provide an assessment of the trees to be removed or trimmed for the proposed project, including the species, specific locations, approximate number, and size.	Early-season snow fall has prevented SCE from performing an inventory of potentially affected trees. SCE will perform this survey in 2022.
3-24	Section 3.5.4.5	**Work Area Stabilization** If benching of temporary work pads is a possibility, potential locations should beidentified now and preliminary engineering should be provided given the substantial presence of sensitive biological, cultural, tribal, and paleontological resources in the proposed project alignment. If SCE is unable to provide this information during this current environmental review, know that the assessment of engineered grading plans after project approval could result in substantial delays in order to complete the necessary CEQA review and supplemental CEQA document.	No benching outside the identified disturbance areas at structure installations is foreseen. If benching is necessary, and such benching would extend beyond the boundaries of a previously-identified disturbance area, then SCE would confer with the CPUC and prepare either an MPR or PFM. SCE will identify potential benching locations during surveys following snowmelt in 2022.
3-26	Section 3.5.10.1.3	**Public Access Restrictions** Access exclusions are not well defined in the PEA. Provide additional detail on project locations where access exclusions would be required, including the length of individual exclusion zones, the timing and duration of individual exclusions over the construction period, and proposed detours. Identify also where multiple exclusion zones could occur simultaneously.	3.5.10.1.3 Public Access Restrictions To ensure public safety during construction of the CSP Project, the public would be restricted from entering or transiting construction work areas and staging areas, and would also be excluded from those areas of the alignment where conductor or OHGW/OPGW removal or installation activities are underway. Public access restrictions would be

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			maintained during the duration of construction activities at a given location or along a given section of the CSP Project alignment. The geographic and temporal extent of access exclusions would be subject to negotiation with Inyo National Forest and the Bureau of Land Management where Forest Service or BLM roads are involved, and subject to encroachment permit conditions established by Caltrans, Inyo County, and Mono County where state or county roadway(s) are involved. As discussed in Sections 5.16 and 5.17, during construction of the CSP Project, portions or the entireties of Silver Canyon Road and Wyman Creek Road may be either closed to non-project traffic or the direction of non-project traffic will be controlled. Such closures or controls, if established, would be employed during the entirety of the construction season (generally mid-May through early November). NOTE: It is impossible at this time to identify where multiple exclusion zones could occur simultaneously, but is possible to identify that multiple exclusion zones will occur simultaneously.
3-28	Section 3.5.15.1 and Appendix H	**Fire Prevention and Emergency Response Plan** Provide a draft Construction Fire Prevention and Emergency Response Plan specifically prepared for proposed project construction as specified in the CPUC PEA Checklist. The template provided in PEA Appendix H is only a generic plan template and does not meet this requirement. Project specific information should include: ▪ Purpose and applicability of plan ▪ Responsibilities and duties ▪ Project areas where the plan applies ▪ Procedures for times of elevated fire danger ▪ Procedures for work restrictions ▪ Procedures for fire reporting, response, prevention and evacuation routes. ▪ Coordination with govt officials ▪ Crew training (including fire safety practices and restrictions) ▪ Fire suppression and communication equipment to be on-hand during construction ▪ Post-construction fire prevention and response measures In addition, both the PEA and the Construction Fire Prevention and Emergency Response Plan should identify any fire breaks (i.e., vegetation clearance) requirements around specific project activities (i.e., hot work) and should confirmthat that such clearance buffers are included in the limits of the defined work areas (or expand the defined work areas, as necessary), and indicate that the vegetation removal in that area is attributed to fire prevention and response.	SCE will submit a draft Construction Fire Prevention and Emergency Response Plan in early 2022. _____ 3.5.15.2 Fire Breaks No new permanent fire breaks (i.e., areas cleared of vegetation) would be developed under the CSP Project. Areas around new structures would be maintained per the applicable standards. ~~No areas would be cleared of vegetation solely for the purposes of creating a temporary fire break.~~ Temporary fire breaks (i.e. areas cleared of vegetation) will be established around certain activities (e.g., hot work) and locations (e.g., fuel storage); these temporary fire breaks would be located within identified project work areas.
3-29	Section 3.7.3.2	**Habitat Restoration and Invasive Plant Management Plans** Provide both a draft Habitat Restoration and Revegetation Plan and an Invasive Plant Management Plan at this time. The proposed project alignment supports sensitive habitats and special-status species, and restoration in both dry arid desert and alpine environments can be complicated, requiring several years to decades to restore pre-existing conditions. The CPUC needs to review these draftplans now in order to ensure that biological resource impacts can be adequately reduced to less than significant levels.	SCE will submit both a draft Habitat Restoration and Revegetation Plan and a draft Invasive Plant Management Plan in 2022.
3-30	Section 3.7.3.2.1	**Restoring Natural Drainage Patterns** Identify how pre-project contours will be determined and documented prior toproject-related ground disturbance.	SCE will submit a draft Habitat Restoration and Revegetation Plan in 2022; the restoration of natural drainage patterns will be addressed in that Plan.

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5.1 Aesthetics (AES)			
AES-2	Section 5.1.1.4 Table 5.1-2	**Landscape Units** This section of the PEA cites two Landscape Units for purposes of documenting and describing existing visual conditions. These Landscape Units do not seem to be based upon the physical and cultural landscape characteristics found along the CSP Project alignment. CPUC PEA Checklist states that landscape units should be developed based on the existing landscape characteristics rather than the project's features or segments. The identified segment from INF Boundary to Fish Lake Valley MeteringStation near the California/Nevada Border passes through a "diverse" variety of landscape units as described in Section 5.1.1.1 Landscape Setting, with wide variations in elevation, vegetative mosaic, and surrounding topography. Expand the landscape units and subsequent analyses (Section 5.1.4.4.2) as appropriate to reflect the variety of existing characteristic landscapes present. For example, Landscape Unit 2 as now described might be considered to include five or more visually distinct units each with its own similar characteristicsof topography, vegetation and cultural improvements such as: Silver Canyon; White Mountain Road Scenic Corridor; Wyman Canyon; Deer Springs Valley; SR 168/Piper Mountains (labeled as Chocolate Mountain on topographic maps); and Fish Lake Valley.	***5.1.1.4 Landscape Units*** Seven Landscape Units are utilized for purposes of documenting and describing existing visual conditions within the CSP Project viewshed. These Landscape Units or subareas are based upon the physical and cultural landscape characteristics found along the CSP Project alignment. Table 5.1-2 summarizes the Landscape Units in terms of their location and approximate length. Figure 5.1-1a depicts the location of Landscape Units in relationship to the CSP Project alignment and photograph viewpoints. **Table 5.1-2: Summary of Landscape Units** ~~1: Control Substation to INF boundary~~ | ~~Inyo County~~ | ~~12~~ ~~2: INF Boundary to Fish Lake Valley Metering Station near the California/Nevada Border~~ | ~~Inyo County and Mono County~~ | ~~33~~ 1: Owens Valley | Inyo County | 12.0 2: Silver Canyon | Inyo County | 7.0 3: White Mountain Summit | Inyo County | 2.0 4: Wyman Canyon | Inyo County | 11.1 5: Deep Springs Valley | Inyo County | 4.4 6: Gilbert Summit / SR 168 | Inyo County | 4.1 7: Fish Lake Valley | Inyo County and Mono County | 4.4 Notes: Segment 4 is excluded from all landscape units due to the very limited scope of work (replacement of two poles) in this Segment. One pole is located on BLM-managed lands that are designated VRM Class II; the pole replacement would be consistent with the management goals for this area. The other pole is located on LADWP-owned lands. Segment 5 is included in Landscape Unit ~~2~~5. **5.1.1.4.1 Landscape Unit 1: Owens Valley (Photographs 1 through 10)** Landscape Unit 1 begins at Control Substation and extends east approximately 12 miles to the boundary of INF. Located within the generally flat northern Owens Valley at an elevation of approximately 4,150 ft amsl, this landscape unit is dominated by the City of Bishop. Situated near the confluence of the Owens River and adjacent creeks draining the nearby mountains, land use in this area is characterized by a mixture of undeveloped open space, residential and commercial development, and scattered agricultural and recreational uses. In contrast to the characteristic high desert scrubland that is most typical of the regional landscape, the area in the vicinity of Bishop appears distinct due to availability of surface water as well as groundwater. Riparian marshes and cottonwoods and willows occupy the floodplains north and east of the city, and areas of irrigated pasture extend out from Bishop's commercial center, along with landscaped residential districts that include numerous mature trees. Photographs 1 through 10 in Figures 5.1-2 a through 5.1-2e show representative views of the CSP Project and surrounding landscape character found within Landscape Unit 1. Two of these views are KOPs selected to show the CSP Project as seen from sensitive locations including viewpoints at the Laws Railroad Museum (refer to Figure 5.1-1a). The Visual Resources Technical Report in Appendix J to this PEA includes a detailed description of each representative photograph. **5.1.1.4.2 Landscape Unit 2: Silver Canyon (Photographs 11 through 15)** From the eastern edge of the Owens Valley, approximately 2 miles east of the town of Laws, the CSP Project crosses

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			into the INF, near the entrance to Silver Canyon, and extends east approximately 7 miles, paralleling the canyon from the forest service boundary to the summit of the White Mountains. In this landscape unit, the broad, open vistas characteristic of the comparatively flat, sparsely vegetated Owens Valley give way to the more varied topography and vegetation of the western flank of White Mountains, where open, long-range views of the CSP Project alignment are generally constrained. Flanked by the relatively smooth terrain cloaked with sparse, low-growing scrub vegetation, the gently rising lower canyon floor initially affords relatively unobstructed views of portions of the CSP Project alignment where it closely parallels Silver Canyon Road, an unpaved access and off-highway recreation road. In the steeper terrain of the upper canyon there are some relatively dense stands of Pinon Pine, and roadway users are afforded intermittent close-range views of individual Project poles where the alignment crosses Silver Canyon Road at several locations. From the upper canyon looking west, panoramic views of the Owens Valley and the Sierra Nevada Mountains become increasingly available, particularly where Silver Canyon Road approaches the largely barren summit. Photographs 11 through 15 in Figures 5.1-2f through 5.1-2h show representative views of the CSP Project and surrounding landscape character found within Landscape Unit 2. One of these views is a KOP selected to show the CSP Project as seen from a sensitive location at the entrance to Silver Canyon (refer to Figure 5.1-1a). The Visual Resources Technical Report in Appendix J to this PEA includes a detailed description of each representative photograph. **5.1.1.4.3 Landscape Unit 3: White Mountain Summit (Photographs 16 through 18)** Landscape Unit 3 encompasses the area from the top of Silver Canyon, near White Mountain Substation and the junction of Silver Canyon Road and White Mountain Road, to the head of Wyman Canyon, situated approximately 2 miles to the northeast. White Mountain Road (Bristlecone Scenic Byway) runs along the north-south oriented summit of the White Mountains from SR-168 to near White Mountain Peak, and permits access to the ancient Bristlecone forests that are unique to this area. White Mountain Road is crossed by the project where the terrain affords open, panoramic views that include rolling topography cloaked in a uniform expanse of yellow gray, low scrub vegetation in the foreground and more distant views of partially forested peaks with rock outcrops and scattered forested patches displaying color and textural contrasts. Photographs 16 through 18 in Figures 5.1-2h through 5.1-2i show representative views of the CSP Project and surrounding landscape character found within Landscape Unit 3. One of these views is a KOP selected to show the CSP Project as seen from a sensitive location at the summit of the White Mountains (refer to Figure 5.1-1a). The Visual Resources Technical Report in Appendix J to this PEA includes a detailed description of each representative photograph. **5.1.1.4.4 Landscape Unit 4: Wyman Canyon (Photographs 19 through 24)** From the top of Wyman Canyon at the eastern edge of the White Mountain summit, Landscape Unit 4 extends approximately 11 miles to the eastern INF boundary at the mouth of Wyman Canyon where it merges with Deep Springs Valley. Descending from the largely barren summit landscape, the Project alignment within this landscape unit approaches the head of the canyon through a dense forest, passing an uninhabited historic cabin, one of several found within the area, before entering the narrow, intermittently wooded canyon. Public access to the canyon is via Wyman Creek Road, a narrow, unpaved track generally limited to OHV vehicles. The Project alignment closely parallels the roadway through the canyon; however, views of the alignment from any one location are generally limited due to the sinuous trajectory of the canyon. Moreover, even at close range, backdrop conditions that include multicolored and textured rock formations and vegetation of varying height and density constrain visibility of individual Project elements. With the exception of a small number of seasonally occupied residences associated with Deep Springs College, the canyon is uninhabited. Photographs 19 through 24 in Figures 5.1-2j through 5.1-2l show representative views of the CSP Project and surrounding landscape character found within Landscape Unit 4. The Visual Resources Technical Report in Appendix J to this PEA includes a detailed description of each representative photograph. **5.1.1.4.5 Landscape Unit 5: Deep Springs Valley (Photographs 25 through 27; 31 and 32)** Landscape Unit 5 begins at the mouth of Wyman Canyon where the Project alignment crosses the INF boundary, and continuing east along Wyman Creek Road for approximately 1.2 miles, along the north end of Deep Springs Valley.

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			Veering northeast for approximately 0.8 mile the Project alignment briefly parallels SR 168, near the point where this eligible scenic highway, after traversing the length of the valley, climbs toward Gilbert Summit. A 2.4 mile-long Project spur extends southeast to the campus of Deep Springs College, crossing SR-168 after approximately 1 mile. The approximately 100 residents at this private educational institution are the only inhabitants within this Landscape Unit, and the verdant campus stands out in contrast to the surrounding desert valley. Marking the transition to the prevailing Basin and Range formations characteristic of the region east of the White Mountains, this landscape unit reflects the rain shadow effect of the Sierra Nevada Range, resulting in sparse, low growing desert scrub vegetation and features large areas of bare rock and soil as sources of visual contrast. This landscape unit is characterized by largely unobstructed, panoramic views, with the mountain backdrop of the Chocolate and White Mountains. Visible at close range, the color, texture and scale of Project elements are largely absorbed with the backdrop and are for the most part difficult to discern beyond approximately 0.25 miles. Photographs 25 through 27 and 31 and 32 in Figures 5.1-2m through 5.1-2p show representative views of the CSP Project and surrounding landscape character found within Landscape Unit 5. One of these views is a KOP selected to show the CSP Project as seen from a sensitive location at the entrance to Deep Springs Valley (refer to Figure 5.1-1a). The Visual Resources Technical Report in Appendix J to this PEA includes a detailed description of each representative photograph. **5.1.1.4.6 Landscape Unit 6: Gilbert Summit/SR 168 (Photographs 28 and 29)** In Landscape Unit 6 the CSP Project alignment enters an expanse of hilly, chaparral covered terrain as it crosses Gilbert Summit part of the northern flank of Chocolate Mountain that forms a divide between Deep Springs Valley and Fish Lake Valley to the northeast. In this landscape unit the Project roughly parallels SR-168 for approximately 4.1 miles as it crosses the divide, although due to the relatively steep gradient and presence of numerous deep ravines in the highly dissected terrain, the highway trajectory diverges between approximately 0.25 and 0.4 miles from the Project alignment at three locations and twice crosses a segment where the alignment splits on the ascent over the summit. In contrast to the distant, panoramic vistas that characterize Deep Springs Valley, views within this landscape unit are more circumscribed. Highway views of the Project are often blocked by topography and somewhat limited. Additionally, in a number of instances where open views are available, Project poles are seen against the mottled texture of the dense chaparral covered terrain. Photographs 28 and 29 in Figures 5.1-2n and 5.1-2o show representative views of the CSP Project and surrounding landscape character found within Landscape Unit 6. The Visual Resources Technical Report in Appendix J to this PEA includes a detailed description of each representative photograph. **5.1.1.4.7 Landscape Unit 7: Fish Lake Valley (Photograph 30)** Landscape Unit 7 begins where the Project alignment enters Fish Lake Valley, a 25 mile-long alluvial valley straddling the California-Nevada state line. Backdropped by the largely barren Silver Peak and Palmetto Mountains to the east, which rise between approximately 1,500 and 3,000 feet above the valley floor, and the White Mountains to the west, this area is sparsely populated and features areas of irrigated cropland bordered by sparsely vegetated high desert terrain. After paralleling SR-168 on its descent from Gilbert Summit, the CSP Project alignment diverges from the highway as it enters Fish Lake Valley and the edge of Landscape Unit 7, with the highway turning to the north for approximately 2 miles where it joins SR-266, the primary transportation conduit through the length of the valley. The Project alignment continues for approximately 3.2 miles across an open landscape of desert sage and alfalfa fields, crosses SR-266 and continues approximately 1.2 miles to the California-Nevada border. Photograph 30 in Figure 5.1-2o shows a representative view of the CSP Project and surrounding landscape character found within Landscape Unit 7. The Visual Resources Technical Report in Appendix J to this PEA includes a detailed description of each representative photograph. **Table 5.1-3: Summary of Representative and KOP Photographs** **Photograph number and Location * denotes KOP** | **Primary Viewers** | **Viewing Distance** | **Predominant Backdrop for Project Structures** **LANDSCAPE UNIT 1** 1. SR-168 crossing near Control Substation | Recreational Motorists Local Motorists | 500 feet | Landscape

ID	PEA Section(s)	Deficiency	Response/Modified Text

2. SR-168 near Control Substation	Recreational Motorists Local Motorists	1,000 feet	Landscape
3. Bishop Creek Battleground Historic Marker	Recreational Motorists	0.2 mile	Landscape
5. Rocking K Road at Ed Powers Road	Local Motorists	0.4 mile	Landscape
5. U.S. 395 west of Bishop	Regional Motorists	500 feet	Landscape and Sky
6. U.S. 395 west of Bishop	Regional Motorists	350 feet	Landscape and Sky
7. Saniger Lane at Dixon Lane	Residents	0.5 mile	Landscape
8. U.S. 6 north of Bishop	Regional Motorists Local Motorists	0.25 mile	Landscape
*9. Silver Canyon Road at Laws Railroad Museum	Recreationalists Local Motorists	150 feet	Landscape and Sky
*10. Laws Railroad Museum	Recreationalists	100 feet	Sky and Landscape
LANDSCAPE UNIT 2			
*11. Silver Canyon Road at INF boundary	Recreationalists	350 feet	Landscape
12. Silver Canyon Road in lower canyon	Recreationalists	200 feet	Landscape
13. Silver Canyon Road in upper canyon	Recreationalists	160 feet	Landscape
14. Silver Canyon Road near high point	Recreationalists	1000 feet	Landscape and Sky
15. Silver Canyon Road near White Mountain overlook	Recreational Motorists Recreationalists	400 feet	Landscape
LANDSCAPE UNIT 3			
16. Silver Canyon Road near White Mountain Substation	Recreational Motorists Recreationalists	< 300 feet	Landscape
17. White Mountain Road (Ancient Bristlecone Scenic Byway)	Recreational Motorists Recreationalists	300 feet	Sky
*18. White Mountain Road (Ancient Bristlecone Scenic Byway) at Wyman Creek Road	Recreational Motorists Recreationalists	400 feet	Landscape
LANDSCAPE UNIT 4			
19. Wyman Creek Road at historic cabin	Recreationalists Recreational Motorists	100 feet	Landscape and Sky
20. Wyman Creek Road in upper canyon	Recreationalists Recreational Motorists	250 feet	Landscape and Sky
21. Wyman Creek Road in middle of canyon	Recreationalists Recreational Motorists	375 feet	Landscape
22. Wyman Creek Road near Roberts Ranch	Recreationalists Recreational Motorists	150 feet	Landscape
23. Wyman Creek Road in lower canyon	Recreationalists Recreational Motorists	200 feet	Landscape
24. Wyman Creek Road at INF boundary	Recreationalists Recreational Motorists	100 feet	Landscape
LANDSCAPE UNIT 5			
*25. Wyman Creek Road near INF boundary	Recreationalists Recreational Motorists	325 feet	Landscape
26. Wyman Creek Road in Deep Springs Valley	Recreationalists Recreational Motorists	450 feet	Landscape
27. SR-168 in Deep Springs Valley	Local and Regional Motorists	250 feet	Landscape and Sky
30. SR-266 in Fish Lake Valley	Regional Motorists	0.3 mile	Landscape
31. SR-168 near Deep Springs College	Residents Local and Regional Motorists	350 feet	Landscape and Sky

ID	PEA Section(s)	Deficiency	Response/Modified Text

LANDSCAPE UNIT 6			
28. SR-168 east of Gilbert Summit	Regional motorists Local Motorists	150 feet	Sky and Landscape
29. SR-168 in Fish Lake Valley	Local and Regional Motorists	250 feet	Sky and Landscape
LANDSCAPE UNIT 7			
32. Deep Springs College entry road	Residents	0.4 mile	Landscape

…

5.1.2.1.1.5 U.S. Department of the Interior, Bureau of Land Management

…

East of the White Mountains, within Landscape Unit ~~2~~s 5, 6, and 7, approximately 10 miles of the CSP Project in Segment 3 crosses BLM administered land that is VRM Class II. In addition, Segment 4 crosses another 2.2 miles of VRM Class II land. Management goals for VRM Class II areas call for retaining the existing landscape character and allow for a low level of change to existing landscape character and any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

…

5.1.4.1.3.1 Construction

…

In Landscape Units 2-7-~~2~~, the CSP Project alignment primarily traverses largely uninhabited portions of INF and BLM land. To varying degrees, CSP Project components will be visible from locations within Deep Springs Valley and over Gilbert Summit along SR-168 east of the White Mountains, as well as publicly-accessible unpaved off-road tracks and public recreation areas. Figures 5.1-6 through 5.1-8 are pairs of existing and post-project views from KOP locations within the INF near White Mountain summit and near the BLM/USFS boundary east of the summit, respectively. This set of figures demonstrates that intervening landforms partially or fully screen CSP Project elements from all but a limited number of viewers in this area, and similar to instances in Landscape Unit 1, where more open views are available, the level of CSP Project visibility is diminished due to backdrop conditions and viewing distance. Moreover, the permanent removal of approximately half of the existing poles in this area would represent an incremental improvement to the visual setting. East of the White Mountains the CSP Project parallels a section of SR-168 that is an eligible State Scenic Highway, where the overall visibility of the CSP Project would be reduced as a result of the permanent removal of all poles within one of the two existing alignments including the permanent elimination from view of previously visible elements along an approximately 1.8 mile-long portion of the highway. Replacement of existing poles within the remaining alignment would include fewer, more widely spaced, taller poles. Similarly, where the CSP Project crosses SR-266 in Fish Lake Valley, a single subtransmission alignment will replace two existing parallel wood pole lines, with fewer new poles more widely spaced compared to the existing poles. In light of the changes outlined above and summarized in Table 5.1-6 as well as demonstrated by the set of visual simulations from the five KOPs presented on Figures 5.1-4 through 5.1-8, the CSP Project would result in incremental visual change that will not substantially alter or degrade existing visual character or quality in the area. Therefore, the impact would be less than significant.

…

ID	PEA Section(s)	Deficiency	Response/Modified Text

Table 5.1-6: Summary of Visual Effects at Key Viewpoints

Photograph number and Location *(Figure number)*	Visual Sensitivity Factor(s)	Viewing Distance/ Distance Zone	Visual Change and Effect
LANDSCAPE UNIT 1			
9. Silver Canyon Road at Laws Railroad Museum looking west *(Figure 5.1-4)*	Proximity to California Historical Landmark Proximity to recreational facility with high viewer sensitivity	100 feet/ Foreground	Permanent removal of subtransmission structures along roadway edge. Reduction in height of existing wood pole in immediate foreground. Removal of subtransmission structures represents an incremental improvement to the visual character of landscape in this area.
10. Laws Railroad Museum looking east *(Figure 5.1-5)*	Proximity to California Historical Landmark Proximity to recreational facility with high viewer sensitivity	250 feet/ Foreground	Taller wood pole-equivalents and a single TSP replace existing wood poles. Increased distance between poles results in fewer subtransmission structures visible in landscape. Increased height of replacement poles does not significantly alter views of White Mountains in backdrop, and overall change would not substantially affect existing landscape character.
LANDSCAPE UNITS 2, 3 and 4			
11.Silver Canyon Road at INF looking east *(Figure 5.1-6)*	High USFS SIO classification Off-highway recreation route with high viewer sensitivity	350 feet/ Foreground	A single alignment of somewhat taller replacement wood pole-equivalent replaces two existing parallel alignments of wood poles resulting in fewer visible subtransmission structures overall. Incremental increase in visibility of some new structures when seen against landscape backdrop in particular lighting conditions. Overall change would not substantially affect existing landscape character and scenic integrity.
18. White Mountain Road (Ancient Bristlecone Scenic Byway) at Wyman Creek Road looking north *(Figure 5.1-7)*	High USFS SIO Classification Ancient Bristlecone Scenic Byway with high viewer sensitivity	<500 feet/ Foreground	Single alignment of incrementally taller wood pole-equivalents and a single TSP replaces two existing parallel alignments of wood poles resulting in fewer visible subtransmission structures overall. Incremental increase in contrast of replacement structures against landscape backdrop compared with existing wood poles, resulting in slight increase in visibility of individual poles in foreground. Overall change would not substantially affect existing landscape character and scenic integrity.
LANDSCAPE UNITS 5, 6 and 7			
25. Wyman Creek Road near INF boundary looking east *(Figure 5.1-8)*	BLM VRM Class II classification Off-highway recreation route with	300 feet/ Foreground	Single alignment of fewer taller wood pole-equivalents replaces two existing parallel alignments of wood poles.

ID	PEA Section(s)	Deficiency	Response/Modified Text
			<table><tr><td></td><td>high viewer sensitivity</td><td></td><td>Incremental increase in height of replacement poles does not substantially affect existing view of distant mountain backdrop from roadway. Visual contrast of replacement poles in the landscape similar to existing wood poles. Overall change would not substantially affect existing landscape character.</td></tr></table> … **5.1.4.4.4 Landscape Units 2, 3 and 4** Within Landscape Units 2, 3 and 4, the CSP Project alignment traverses the INF and crosses the rugged, largely uninhabited, and for the most part sparsely-forested White Mountains, where it generally parallels unpaved access or off-highway recreation roads in an area of varied topography and vegetation. In this environment, open, long-range views of the CSP Project alignment are limited to locations near the almost treeless summit of the White Mountains. Visibility of CSP Project elements is also influenced by the variations in backdrop topography as well as daylight conditions where access routes pass through relatively narrow canyons. Viewer sensitivity in this area is generally high. … **5.1.4.4.5 Landscape Units 5, 6 and 7** The CSP Project alignment crosses the open, panoramic landscape of Deep Springs Valley, Gilbert Summit, and Fish Lake Valley within Landscape Units 5, 6 and 7. Largely unobstructed, panoramic views of the CSP project are available and are generally seen against the mountain backdrop of the White, Inyo, and Chocolate Mountains. Viewer sensitivity in this area is generally high.
AES-8	Figure set 5.4-1	**Habitat Designations** Vegetation alliances and associations for identified construction staging areas are not indicated, the disturbance of which may create long-term visual impacts. These designations may require Habitat Restoration and RevegetationPlans (APM BIO-RES-1) that may (with visual design criteria included) mitigate long-term visual impacts. Update Figure set 5.4-1 to identify these species.	Construction staging areas will be surveyed at the appropriate time in 2022; Figureset 5.4-1 will be updated following the surveys.
AES-9	Figure set 5.4-2	**Rare Plant Designations** Rare plant species for identified construction staging areas are not indicated, thedisturbance of which may require Habitat Restoration and Revegetation Plans (APM BIO-RES-1) that may (with visual design criteria included) mitigate long-termvisual impacts. Update Figure set 5.4-2 to identify these species.	Construction staging areas will be surveyed at the appropriate time in 2022; Figureset 5.4-1 will be updated following the surveys.
AES-10	Section 5.4.4.1.2.1 Table 5.4-8	**Revegetation Timeline** Provide an estimate for the length of time it would take for the various Vegetation Alliances to revegetate through natural succession or with APM BIO-RES-1 to essentially match existing conditions.	This topic, among others, will be addressed in the draft Habitat Restoration and Revegetation Plan that SCE will submit in 2022.
5.2 Agriculture and Forestry Resources (AFR)			
5.3 Air Quality (AQ)			
5.4 Biological Resources (BIO)			
BIO-1	Section 5.4.1.2	**Temporary and Permanent Project Impacts** The CPUC PEA Checklist states that “All temporary and permanent project areasmust be within the survey area.” The survey area described in Section 5.4.1.2 does not include all work areas, such as contractor material yards.	SCE will perform the requested survey at the appropriate time in 2022.

ID	PEA Section(s)	Deficiency	Response/Modified Text
		The SCE response to this issue in Pre-filing letter #5 stated "Areas that have not yet been surveyed (including access roads located outside of the survey area that will besubject to rehabilitation as described in the PEA), as well as areas that may be identified later, will be subject to pre-construction surveys per APM BIO-GEN-1, Pre-construction Biological Clearance Surveys and Monitoring." The aforementioned response does not meet the requirements of the CPUC PEA Checklist. Provide a revised survey that includes all potential temporary and permanent project impact areas.	
BIO-5	Table 5.4-6	**Special-status Wildlife Species Observed within the CSP Project Alignment** Update Table 5.4-6 to acknowledge the following observations: ▪ Olive-sided flycatcher - Multiple eBird records of singing olive-sided flycatchers in Wyman Canyon recorded in June and July indicate that this species likely nests near the project in Wyman Canyon where conifer trees are present. ▪ Yellow warbler - An eBird record in the middle of Wyman Canyon of singing yellow warblers in late June indicates that the species nests in that section of Wyman Canyon. ▪ Desert bighorn sheep – CDFW has provided locational data of many sightings within Silver Canyon including observations on lambing in the project vicinity and observations of adults leaning against the existing poles. ▪ Northern goshawk – A CNDDB record of an adult northern goshawk on July 2, 2020 indicates that they likely nest in the conifer belt of the project site. ▪ Long-eared owl – The species is cryptic, so lack of CNDDB records is not surprising. Appropriate nesting habitat is found within habitats with trees throughout Silver Canyon and Wyman Canyon. Burrowing owl - The eBird records for Chalfant Valley are from June, indicating that nesting is possible there.	This will require concurrence of SCE biologists, as the CPUC direction countermands previous SCE direction. SCE does not feel it is necessary to update Table 5.4-6; the information presented in the Table is accurate and does not contradict the commenter's observations. As per APM BIO-AVI-1 and the to-be-developed Nesting Bird Management Plan, pre-construction nest surveys will be conducted as part of the CSP Project; these surveys will define what species are nesting at the time of the project, and will protect those species that are found to be nesting. Desert bighorn sheep will be addressed in a later SCE deficiency response submittal.
BIO-16	Section 5.4.4.1.2.1	**Vegetation Mapping** Mapped vegetation on Figure 5.4-1 does not include all work areas, such as contractor material yards, which were provided in GIS data with the PEA. Since vegetation in these areas was not mapped, it does not appear that impacts within these areas were quantified in table 5.4-8. It is also possible that additionalsensitive natural communities are present within work areas where vegetation has not been mapped. Therefore, the discussion of impacts to sensitive natural communities is not complete. Revise the analysis to include all work areas.	SCE will survey un-surveyed areas at the appropriate time in 2022.
BIO-17	Section 5.4.4.1.4.1	**Aquatic Species Impact** The description of potential impacts to aquatic species is too simplistic, as it states "No in-water work is included in the CSP Project; therefore, no special status fish or other aquatic species would be affected by Project activities." This isnot consistent with the overall analysis and APMs, which address accidental sedimentation of aquatic habitat. Revise impact analysis accordingly.	**5.4.4.1.4 Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites?** *5.4.4.1.4.1 Construction* **Less Than Significant Impact.** No in-water work is included in the CSP Project; therefore, no physical or aural interference of the movement of native resident or migratory fish would be realized. ~~no special-status fish or other aquatic species would be affected by Project activities.~~ Increases in total suspended solids, particularly transient short-term increases of the type that could result from CSP Project construction activities in the immediate vicinity of a waterbody, generally do not interfere substantially with the movement of fish species (Kjelland et al. 2015). This, combined with the implementation of BMPs as directed in APM WET-1 and as presented in Section 3.5.11.3, would result in no substantial interference of the movement of native resident or migratory fish. Desert bighorn sheep were observed along the CSP Project alignment in two locations in Silver Canyon in Segment 3 in the White Mountains, where known herds occur. Bighorn sheep require habitat connectivity within their home range to move uninhibited to foraging areas and water sources, and construction activities may interfere with their seasonal movement. Increased human presence within habitat and removal of vegetation during migratory periods could result in disruption of migratory behaviors of bighorn sheep. Ground-disturbing activities have the potential to increase

ID	PEA Section(s)	Deficiency	Response/Modified Text
			colonization of weed species and reduce native vegetation. Incidental introductions of invasive non-native weeds have the potential to reduce habitat quality in the immediate area and beyond through direct competition and occupation of prime germination sites of prime forage species. SCE would implement APM BIO-MAM-1: Bighorn Sheep (Nelson's/Desert), which includes specific measures to avoid and minimize impacts to desert bighorn sheep, including pre-construction surveys, construction monitoring, seasonal work restrictions, helicopter use restrictions, and other measures. Replacement subtransmission structures would be installed proximate to existing subtransmission structures, or in new alignments immediately adjacent to the existing subtransmission line alignments. Due to their small cross-sections, replacement structures themselves would not interfere with the movement of any species or corridor, and no structures are located on a known native wildlife nursery site. Construction activities would be temporary and would affect only small, geographically-dispersed areas at any one time; these construction activities would not interfere substantially with the movement of any wildlife species, although construction activities may interfere with the movement of individual animals. With the implementation of these avoidance measures and APMs, impacts to bighorn sheep would be less than significant. https://link.springer.com/article/10.1007/s10669-015-9557-2
BIO-19	Section 5.4.4.1.7.2	**Bird and Bat Impact Analysis** Section 3.3.4.4 on page 3-12 described that guys are typically used when woodpole-equivalents are located on angles or corners to provide support to the poles. Guys pose collisions risks to birds and bats. Provide an analysis of the impact of guys on birds and bats in Section 5.4.4.1.7.2and application of APM BIO-AVI-6.	*5.4.4.1.7.2 Operations* **Less than Significant Impact.** Following construction, 858 fewer poles will be present along the CSP Project alignment; the removal of these poles will reduce the collision risk for birds and bats. Many of the poles along the CSP Project alignment are guyed, and some new poles to be installed under the CSP Project may be guyed depending upon field conditions at the time of construction. While the number of guys that will be removed as a result of the CSP Project is unknown, 858 fewer poles will be present along the alignment. In addition to the reduction in the number of guys along the alignment compared to what currently exists in the environment, there is no published information to suggest that guyed power line structures pose a significant collision risk for birds (APLIC 2012) or bats. Further, no new lengths of conductor will be installed under the CSP Project; the numbers and lengths of existing conductor will be replaced with the same numbers and lengths of conductor. The new conductor will have a larger diameter than the existing conductor, which will reduce the collision risk for birds and bats. The OPGW/OHGW to be installed under the CSP Project will be of a diameter roughly equivalent to that of the existing conductor; the OPGW/OHGW represents new overhead wire along the CSP Project alignment, as OPGW/OHGW is not currently installed. While the OPGW/OHGW will be new feature in the environment, it is not anticipated to present a substantial collision risk for birds or bats. Therefore, the CSP Project is not anticipated to present a substantial collision or electrocution risk for birds or bats. Further, as presented in APM BIO-AVI-6, all transmission and substation facilities for the project will be designed to be avian-safe, following the intent of Suggested Practices for Avian Protection on Power Lines: the State of the Art in 2006 (APLIC 2006). All transmission facilities will be evaluated for potential collision risk and, where determined to be high risk, lines will be marked with collision reduction devices in accordance with Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012).
5.5 Cultural Resources (CULT)			
CUL-1	Section 5.5	**Paleontology Setting** Remove the third paragraph in this section. Paleontology is no longer listed underCultural Resources in the CEQA checklist, nor is it further discussed in this chapter.	5.5 Cultural Resources This section identifies cultural resources in the CSP Project area, identifies applicable significance thresholds, assesses the CSP Project's impacts to these resources and their significance, and recommends measures to avoid or substantially reduce any effects found to be potentially significant. See Section 5.18, Tribal Cultural Resources, for a

ID	PEA Section(s)	Deficiency	Response/Modified Text
			discussion on cultural resources potentially of importance to California Native American tribes. Cultural resources are defined as any object or specific location of past human activity, occupation, or use that is identifiable through historical documentation, inventory, or oral evidence. Cultural resources can be separated into three categories: archaeological, building and structural, and traditional resources. Archaeological resources include both prehistoric and historic remains of human activity. Prehistoric resources can include lithic scatters, ceramic scatters, quarries, habitation sites, temporary camps/rock rings, ceremonial sites, and trails. Historic-era resources are typically those that are 50 years or older. Historic archaeological resources can consist of structural remains (e.g., concrete foundations), historic objects (e.g., bottles and cans), features (e.g., refuse deposits or scatters), and sites (e.g., resources that contain one or more of the aforementioned categories). Built environment resources range from historic buildings to canals, historic roads and trails, bridges, ditches, cemeteries, and electrical infrastructure, such as transmission lines, substations, and generating facilities. Traditional cultural resources are resources associated with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community. They are rooted in a traditional community's history and are important in maintaining the continuing cultural identity of the community. ~~Paleontology is the study of life from the geologic past that involves the analysis of plant and animal fossils, including those of microscopic size, and their relationships to existing environments and the chronology of the earth's history. A paleontological resource is a locality containing vertebrate, invertebrate, or plant fossils (e.g., fossil location, fossil-bearing formation, or a formation with the potential to bear fossils).~~
CUL-2	Section 5.5.1.5	**Historic Background** This historic background appears to be taken only from the archaeological report when it should be a blending of information from both the archaeologicaland built environment reports to ensure that all historic contexts relevant to cultural resources are included. Although they appear to have been independently prepared and have different authors, the built environment report context section and this historic background section serves the same purpose and should essentially contain the same information. For example, thereis no Recreation context, as found in the built environment report. This subheading needs to be added to the section (unless it is deleted from the built environment report). Furthermore, other sections roughly correspond to sections of the historic context statement in the built environment report, but the sections should be the same. For example, Water Conveyance and Electrical Power Conveyance are separate sections in the built environment report and here Hydroelectric Development is a single section. The subheading titles (those used are from the archaeological report, not the built environment report) are not as important as making sure that relevant information applicable to both archaeological and built environment resourcesis included and that this information and the manner in which it is organized is consistent across both reports.	New sections added as below. 5.5.1.5.6 Water Conveyance As is the common theme with most arid western states, California's existence is premised on the presence of and liberties taken with water. The conveyance of water has precipitated several of the state's longest running political wars. By the 1970s there were 1,251 major reservoirs in California with nearly every significant river being dammed at least once (Reisner 1987). Within the CSP project area, water systems are most importantly associated with agricultural irrigation mining, the development of hydroelectric power, and the development of community water systems. The earliest documentation of irrigation systems in the area was in 1855-1856 by Allexey W. Von Schmidt, a San Francisco-based civil engineer, who recorded numerous hand-dug Native American irrigation ditches in the vicinity of present-day Bishop (Lawton et al. 1976:14). In the 1870s, early American settlers created irrigation systems by diverting creeks onto adjacent lands and, in some instances, these diversions resulted in an excess of irrigation and swamping of lands (Vorster 1992). Between 1878 and 1905, farmers in the Owens Valley organized 11 mutual water companies, built a network of canals and ditches in an effort to increase the amount of irrigable land, and by the early twentieth century, over 100 miles of unlined canals carried water from the Owens River to approximately 70,000 acres of land between Bishop and Big Pine (Vorster 1992). In the 1920s, the Owens Valley experienced a drought, forcing many local farmers and ranchers to sell their land and associated water rights. The City of Los Angeles was the buyer hoping to divert the water supply back into the Owens River to feed the Los Angeles Aqueduct. The Bishop Creek Canal, the Jenkins Ditch, the Owens River Canal, and the Lower and Upper McNally Canals, were all acquired by the LADWP in a period identified as the "Water War." Despite attempts by locals to regain control of the water supply, by 1930, the City of Los Angeles owned 90 percent of the Owens Valley water rights and by 1933 the LADWP owned approximately 95% of the farmland in the Valley. The transfer of water to Los Angeles caused severe environmental degradation to the Owens Valley over the second half of the twentieth century.

ID	PEA Section(s)	Deficiency	Response/Modified Text
			… 5.5.1.5.8 Recreation in the Owens Valley While the remoteness of the Owens Valley limited recreational use for much of the 19th-century, the use of earthen canals as swimming and ice-skating zones, visits to geothermal hot springs, hiking, and nature watching did occur. The establishment of the Inyo National Forest in 1907 and the designation of El Camino Sierra, the region's first "real" highway connected the Owens Valley with the rest of the country, in 1910 opened up the region to motorists and outdoor enthusiasts (Inyo County 2019). By the 1920s, the Owens Valley region had become a tourist and recreational mecca (Selters 2012). Valley residents promoted the area's scenic beauty and established commercial enterprises to increase tourism. Keough Hot Springs opened in 1919 as a health and leisure resort around its geothermal water source (Cook 2019). Locations such as the Rocking K Guest Ranch, which opened in 1947, served as a popular destination with vacationers passing through Bishop on their way to Mammoth. With the opening of ski lifts in Mammoth in 1955, visits through the Owens Valley continues to increase. After World War II, tourism increased in the region, and by the 1970s tourism revenue was double that of ranching, mining, and logging combined (Wehrey 2013). Today tourism remains an important industry and the area continues to attract visitors for a variety of activities such as hike, camping, hunting, fishing, and skiing.
CUL-3	Section 5.5.1.7	**Cultural Resources Summary** Throughout this section, resources are discussed as historic sites, prehistoric sites, and multicomponent sites, but there is no expanded discussion that identifies thedifferent types of sites within each category. For example, prehistoric sites can include lithic scatters, hunting blinds, habitation sites, etc. This is best introduced under section 5.5.1.7.1.2.1 Records Search results. Although individual sites are described in Table 5.5-1, Section 5.5.1.7.1.2.2 Field Survey results needs to summarize the site types within the APE. Provide a summary table by segmentand site type. Define lithic scatter, multicomponent, and any other terms that may not be common to the reader.	New section added as below. 5.5.1.7.1.2.2 Archaeological Resource Types Based on the results of the records search, both prehistoric and historic archaeological sites were expected to occur within the Project area. Prehistoric archaeological sites include material left by people before the development of writing and common site types within the project area include lithic scatters, milling features, and midden/habitation sites. Historic archaeological sites are those that have written documentation to help site interpretations and common site types within the project area include historic refuse scatters and mining sites. Multicomponent sites are those that include material from both time periods. Prehistoric Site Types Lithic Scatter: A site classified as a lithic scatter consists of a surface scatter of chipped stone debris (or debitage) that is primarily the result of the manufacture of chipped stone tools such as knives, dart points, arrow points, scrapers, and other tools. The tools themselves may also be present within the site. Other artifacts, such as ground stone (used for food processing), ceramics, or beads, and features, such as hearths, milling features, rock art, or midden (darkened soil from habitation), may also be present in association with a lithic scatter. Milling Feature: A site classified as milling feature is typically a non-portable bedrock outcrop or boulder with surfaces and/or depressions used for the purpose of resource processing. The milling surfaces are intentionally created, as shown by grinding, polish, smoothing, pecking, or striations present. Midden/Habitation Site: A site classified as a midden or habitation site contains soil that is darkened and has a greasy feel, which is the result of discarded artifacts, bone and shell, food refuse, charcoal, ash, rock, human remains, structural remnants, and other cultural leavings. Historic Site Types Historic Refuse Scatter: A site classified as a historic refuse scatter is a concentration of historic period artifacts,

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typically including cans, glass, and/or ceramics; other historic material such as structural debris may also be present. The refuse could be in the location of original use and discard or may be the result of collection and moving to a separate location for disposal.

Mining Site: A site classified as a mining site contains evidence related to the extraction and exploration of natural occurring minerals or metals. This includes the extraction sites themselves (i.e., mining tunnels, adits [openings]), processing sites (i.e., mill site, smelting site), or waste from processing (i.e., tailings).

…

Table 5.5-1 modified as below:

Table 5.5-1: Summary of Archaeological Resources within the Project Area

Resource	Landowner	Age[1]	Description	NRHP/CRHR Eligibility Recommendation[1,2]	Within Direct APE?	Project Segment
FS# 05045302505 (CSP-Site-02)	INF	PRE/HIS	Lithic scatter (hunting station); historic refuse scatter	PRE: RE (Criterion D/4); HIS: RNE	Yes	1
CSP-Site-05	Private	PRE	Lithic scatter (11 flakes)	RNE	Yes	1
CSP-Site-06	Private	HIS/PRE	Refuse scatter; lithic scatter (2 flakes)	HIS: RNE; PRE: n/a	Yes	1
CSP-Site-07	Private	PRE	Lithic scatter	RE (Criterion D/4)	Yes	1
CSP-Site-09	Private	HIS	Refuse scatter	RNE	Yes	1
CSP-Site-10	Private	PRE/HIS	Lithic and ground stone scatter; refuse scatter	PRE: RE (Criterion D/4); HIS: RNE	Yes	1
CSP-Site-13	Private	PRE/HIS	Lithic and ground stone scatter (1 mano, 6 flakes); refuse scatter (2 artifacts)	PRE: RNE; HIS: n/a	Yes	1
CSP-Site-14	Private	HIS/PRE	Refuse scatter; lithic scatter (1 flake)	HIS: RNE; PRE: n/a	Yes	1
CSP-Site-15	Private; BLM-Bishop	HIS	Refuse scatter	RNE	Yes	1
FS# 05045302506 (CSP-Site-17)	INF	HIS	~~Adit~~	RNE	Yes	1
FS# 05045302507 (CSP-Site-19)	INF	HIS	Wooden drainage feature	RNE	Yes	1
FS# 05045302508 (CSP-Site-20)	INF	HIS	Refuse scatter, ~~foundation~~ and privy remnants	RNE	Yes	1
FS# 05045302509 (CSP-Site-21)	INF	HIS	Refuse scatter	RNE	Yes	1
FS# 05045302510 (CSP-Site-23)	INF	HIS	~~Adit~~	RNE	Yes	1
FS# 05045302511 (CSP-Site-27)	INF	HIS	Refuse scatter	RNE	Yes	1
FS# 05045302512 (CSP-Site-29)	INF	HIS	Refuse scatter	RNE	Yes	1
FS# 05045302513 (CSP-Site-30)	INF	HIS	Refuse scatter	RNE	Yes	1
CSP-Site-36	Private	PRE	Lithic, ground stone, and ceramic scatter	RE (Criterion D/4)	Yes	2
CSP-Site-38	Private	PRE	Lithic scatter	RE (Criterion D/4)	Yes	1
CSP-Site-39	Private	PRE	Lithic scatter	RE (Criterion D/4)	Yes	1
CSP-Site-40	Private	PRE	Lithic scatter	RE (Criterion D/4)	Yes	1
~~CSP-Site-42~~	~~Private~~	~~PRE~~	~~Lithic scatter (4 flakes)~~	~~RNE~~	~~No~~	
CSP-Site-53	Private	PRE	Lithic scatter (9 flakes)	RNE	Yes	2
CSP-Site-55	Private	PRE/HIS	Lithic, ground stone, and ceramic scatter; refuse scatter	PRE: RE (Criterion D/4); HIS: RNE	Yes	1
CSP-Site-57	Private	PRE/HIS	Lithic scatter; refuse scatter	PRE: RE (Criterion D/4); HIS: RNE	Yes	1
CSP-Site-59	BLM-Bishop	HIS	Refuse scatter and rock feature	RNE	Yes	1
CSP-Site-60	Private	HIS/PRE	Refuse scatter; lithic scatter (1 flake)	HIS: RNE; PRE: n/a	Yes	1
CSP-Site-61	BLM-Bishop	HIS/PRE	Refuse scatter, gravel quarry, and datums; lithic scatter (2 flakes)	HIS: RNE; PRE: n/a	Yes	1
CSP-Site-62	BLM-Bishop	PRE	Lithic scatter	RE (Criterion D/4)	Yes	1
CSP-Site-63	BLM-Bishop	HIS/PRE	Refuse scatter; lithic scatter (1 flake)	HIS: RNE; PRE: n/a	Yes	1
~~CSP-Site-72~~	~~BLM-Bishop~~	~~PRE/HIS~~	~~Rock rings and lithic scatter; refuse scatter~~	~~PRE: RE (Criterion D/4); HIS: RNE~~	~~No~~	
~~CSP-Site-73~~	~~BLM-Bishop~~	~~HIS~~	~~Refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-74~~	~~BLM-Bishop~~	~~HIS~~	~~Refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-75~~	~~BLM-Bishop~~	~~PRE~~	~~Lithic scatter~~	~~RE (Criterion D/4)~~	~~No~~	
~~CSP-Site-76~~	~~BLM-Bishop~~	~~PRE~~	~~Lithic scatter~~	~~RE (Criterion D/4)~~	~~No~~	
~~CSP-Site-77~~	~~BLM-Bishop~~	~~PRE~~	~~Lithic scatter~~	~~RE (Criterion D/4)~~	~~No~~	
CSP-Site-101	Private	HIS/PRE	Refuse scatter; lithic scatter (8 flakes)	HIS: RNE; PRE: RNE	Yes	1
CSP-Site-102	Private	PRE/HIS	Lithic scatter; refuse scatter	PRE: RE (Criterion D/4); HIS: RNE	Yes	1
CSP-Site-105	Private	HIS	Refuse scatter	RNE	Yes	1

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Table 5.5-1: Summary of Archaeological Resources within the Project Area

Resource	Landowner	Age[1]	Description	NRHP/CRHR Eligibility Recommendation[1,2]	Within Direct APE?	Project Segment
CSP-Site-106	Private	HIS/PRE	Refuse scatter; lithic scatter (1 flake)	HIS: RNE; PRE: n/a	Yes	3
CSP-Site-107	Private	PRE/HIS	Lithic scatter; refuse scatter	PRE: RE (Criterion D/4); HIS: RNE	Yes	3
CSP-Site-108	Private	PRE/HIS	Lithic scatter, ceramic scatter, and glass trade bead; refuse scatter	PRE: RE (Criterion D/4); HIS: RNE	Yes	3
CSP-Site-112	Private	HIS	Refuse scatter	RNE	Yes	3
~~CSP-Site-115~~	~~Private~~	~~PRE/HIS~~	~~Lithic, ground stone, and ceramic scatter; refuse scatter~~	~~PRE: RE (Criterion D/4); HIS: RNE~~	~~No~~	
~~CSP-Site-116~~	~~Private~~	~~HIS~~	~~Refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-117~~	~~Private~~	~~PRE/HIS~~	~~Lithic scatter and faunal; refuse scatter~~	~~PRE: RE (Criterion D/4); HIS: RNE~~	~~No~~	
~~CSP-Site-118~~	~~Private~~	~~HIS~~	~~Refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-121~~	~~Private~~	~~PRE~~	~~Lithic scatter (6 flakes)~~	~~RNE~~	~~No~~	
~~CSP-Site-122~~	~~Private~~	~~PRE/HIS~~	~~Lithic scatter (22 flakes); refuse scatter and gravel quarry~~	~~PRE: RNE; HIS: RNE~~	~~No~~	
~~CSP-Site-123~~	~~Private~~	~~PRE~~	~~Lithic scatter (9 flakes)~~	~~RNE~~	~~No~~	
~~CSP-Site-124~~	~~Private~~	~~HIS~~	~~Refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-125~~	~~Private~~	~~HIS~~	~~Homestead and refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-127~~	~~Private~~	~~HIS~~	~~Homestead and refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-128~~	~~Private~~	~~HIS~~	~~Refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-129~~	~~Private~~	~~HIS~~	~~Refuse scatter~~	~~RNE~~	~~No~~	
CSP-Site-132	Private	HIS	Refuse scatter	RNE	Yes	2
CSP-Site-135	Private	HIS	Refuse scatter; rock features, and road alignment	RNE	Yes	1
CSP-Site-136	Private	HIS	Refuse scatter; foundations, and rock features	RNE	Yes	1
CSP-Site-137	Private	HIS	Refuse scatter	RNE	Yes	1
CSP-Site-138	Private	HIS/PRE	Refuse scatter and remnant fence line; lithic scatter (1 biface, 3 flakes)	HIS: RNE; PRE: RNE	Yes	1
CSP-Site-139	Private	HIS	Refuse scatter and cairn	RNE	Yes	1
CSP-Site-140	BLM-Bishop	HIS/PRE	Refuse scatter and remnant road alignments; lithic scatter (1 flake, 1 tested cobble)	HIS: RNE; PRE: n/a	Yes	1
CSP-Site-141	BLM-Bishop	HIS	Refuse scatter	RNE	Yes	3
CSP-Site-142	BLM-Bishop	HIS	Refuse scatter	RNE	Yes	3
~~CSP-Site-144~~	~~Private~~	~~PRE/HIS~~	~~Lithic scatter (31 flakes); Refuse scatter~~	~~PRE: RNE; HIS: RNE~~	~~No~~	
~~CSP-Site-146~~	~~BLM-Bishop~~	~~PRE~~	~~Lithic scatter~~	~~RE (Criterion D/4)~~	~~No~~	
~~CSP-Site-147~~	~~BLM-Bishop~~	~~HIS~~	~~Refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-148~~	~~BLM-Bishop~~	~~HIS/PRE~~	~~Refuse scatter; lithic scatter~~	~~HIS: RNE; PRE: RNE~~	~~No~~	
~~CSP-Site-149~~	~~BLM-Bishop~~	~~HIS~~	~~Refuse scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-150~~	~~BLM-Bishop~~	~~HIS/PRE~~	~~Refuse scatter; lithic scatter (1 flake)~~	~~HIS: RNE; PRE: n/a~~	~~No~~	
~~CSP-Site-151~~	~~BLM-Bishop~~	~~PRE/HIS~~	~~Lithic and ground stone scatter; refuse scatter~~	~~PRE: RE (Criterion D/4); HIS: RNE~~	~~No~~	
~~CSP-Site-152~~	~~BLM-Bishop~~	~~HIS/PRE~~	~~Refuse scatter and railroad grade; lithic scatter (1 biface, 1 flake)~~	~~HIS: RNE; PRE: n/a~~	~~No~~	
~~CSP-Site-153~~	~~BLM-Bishop~~	~~PRE/HIS~~	~~Lithic scatter; refuse scatter and excavated pits~~	~~PRE: RE (Criterion D/4); HIS: RNE~~	~~No~~	
~~CSP-Site-155~~	~~BLM-Ridgecrest~~	~~PRE/HIS~~	~~Lithic, ground stone, and ceramic scatter; refuse scatter~~	~~PRE: RE (Criterion D/4); HIS: n/a~~	~~No~~	
CSP-Site-158	BLM-Ridgecrest	PRE	Lithic scatter (12 flakes)	RNE	Yes	5
~~CSP-Site-160~~	~~Private~~	~~PRE~~	~~Lithic and ceramic scatter~~	~~RNE~~	~~No~~	
~~CSP-Site-163~~	~~Private~~	~~PRE~~	~~Lithic scatter~~	~~RE (Criterion D/4)~~	~~No~~	
~~CSP-Site-164~~	~~BLM-Ridgecrest~~	~~PRE~~	~~Lithic scatter (7 flakes)~~	~~RNE~~	~~No~~	
~~CSP-Site-165~~	~~BLM-Ridgecrest~~	~~PRE~~	~~Lithic and ground stone scatter~~	~~RE (Criterion D/4)~~	~~No~~	
~~CSP-Site-166~~	~~BLM-Ridgecrest~~	~~PRE~~	~~Lithic scatter~~	~~RE (Criterion D/4)~~	~~No~~	
CSP-Site-170	BLM-Ridgecrest	PRE	Lithic scatter (1 modified flake, 5 flakes)	RNE	Yes	3
CSP-Site-173	BLM-Ridgecrest	HIS	Mining site	RE (Criterion A/1)	Yes	3
CSP-Site-174	BLM-Ridgecrest	HIS	Prospect pit	RNE	Yes	3

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Table 5.5-1: Summary of Archaeological Resources within the Project Area

Resource	Landowner	Age[1]	Description	NRHP/CRHR Eligibility Recommendation[1,2]	Within Direct APE?	Project Segment
CSP-Site-175	BLM-Ridgecrest	HIS	Cairn	RNE	Yes	3
CSP-Site-176	BLM-Ridgecrest	HIS	Refuse scatter	RNE	Yes	3
CSP-Site-177	BLM-Ridgecrest	HIS	Cairn	RNE	Yes	3
CSP-Site-178	BLM-Ridgecrest	HIS	Cairn	RNE	No	3
CSP-Site-179	BLM-Ridgecrest	HIS	Two cairns	RNE	Yes	3
CSP-Site-180	BLM-Ridgecrest	HIS	Mining claim boundary markers	RNE	Yes	3
CSP-Site-183	BLM-Ridgecrest	PRE	Lithic and ground stone scatter	RE (Criterion D/4)	Yes	3
CSP-Site-184	BLM-Ridgecrest	HIS	Refuse scatter	RNE	Yes	3
CSP-Site-186	BLM-Ridgecrest	HIS	Refuse scatter	RNE	Yes	3
CSP-Site-187	Private	HIS	Refuse scatter	RNE	Yes	3
FS# 05045302545 (CSP-Site-305)	IND	HIS	Prospect pit, milled lumber feature, and refuse scatter	RNE	Yes	3
FS# 05045302546 (CSP-Site-310)	IND	HBE/HIS	Cabin and refuse scatter	HBE: unevaluated; HIS: RNE	Yes	3
CSP-Site-316	Private	PRE	Lithic scatter	RNE	Yes	3
FS# 05045302547 (CSP-Site-318)	IND	PRE/UNK	Hunting blind, milling slick, and cairn	RE (Criterion D/4)	Yes	3
CSP-Site-319	Private	PRE	Lithic scatter	RNE	No	3
FS# 05045302548 (CSP-Site-322)	IND	HIS	Mining features and refuse scatter	RE (Criteria A/1 and C/3)	Yes	3
FS# 05045302549 (CSP-Site-325)	IND	HIS/ PRE	Mining features and refuse scatter; lithic scatter (1 flake)	HIS: RNE; PRE: n/a	Yes	3
FS# 05045302550 (CSP-Site-327)	IND	HIS	Refuse scatter	RNE	Yes	3
FS# 05045302551 (CSP-Site-328)	IND	HIS	Cairn and two cans	RNE	Yes	3
FS# 05045302552 (CSP-Site-329)	IND	HIS	Cairn and one can	RNE	Yes	3
FS# 05045302553 (CSP-Site-330)	IND	HIS	Rock feature (smelting furnace) and two cans	RNE	Yes	3
FS# 05045302554 (CSP-Site-331)	IND	HIS	Historic petroglyph	Unevaluated	Yes	3
FS# 05045302555 (CSP-Site-332)	IND	HIS	Refuse scatter	RNE	Yes	3
FS# 05045302556 (CSP-Site-335)	IND	PRE	Lithic scatter, ground stone scatter, and midden	RE (Criterion D/4)	Yes	3
FS# 05045302557 (CSP-Site-337)	IND	PRE	Lithic scatter	RE (Criterion D/4)	Yes	3
14-000259 (CA-INY-259); 14-002771 (CA-INY-2771)	BLM-Ridgecrest	PRE/-HIS	Habitation site; White Mountain City	PRE (CA-INY-259): RE (Criterion D/4); HIS (CA-INY-2771): RE (Criteria A/1, C/3, D/4)	Yes	3
14-001384 (CA-INY-1384/H)	Private	PRE/-HIS	Habitation site; refuse scatter	Determined Eligible (Prehistoric)	Yes	1 and 2
14-003717 (CA-INY-3717/H); FS# 05045300512	IND	PRE/-HIS	Lithic, ground stone and ceramic scatter, petroglyph, midden; refuse scatter	PRE: RE (Criterion D/4); HIS: RNE	Yes	3
14-005662 (CA-INY-5309)	Private	PRE/-HIS	Lithic scatter; refuse scatter	PRE: RE (Criterion D/4); HIS: RNE	Yes	3
14-005665 (CA-INY-5312/H)	Private	HIS/-PRE	Refuse scatter; lithic and ground stone scatter	HIS: RNE; PRE: RNE	Yes	3
14-005666 (CA-INY-5313H)	Private	HIS	Refuse scatter	RNE	Yes	3
14-005683 (CA-INY-5330H)	BLM-Ridgecrest	HIS	Mining site	RNE	Yes	3
14-008366	Private	PRE/-HIS	Lithic scatter (6 flakes); refuse scatter	PRE: RNE; HIS: RNE	Yes	3
14-008368	Private	HIS/-PRE	Refuse scatter and milled lumber feature; lithic scatter (3 flakes)	HIS: RNE; PRE: n/a	Yes	3
~~14-008605 (CA-INY-6763)~~	~~Private~~	~~PRE/-HIS~~	~~Lithic scatter, refuse scatter~~	~~PRE: RE (Criterion D/4); HIS: RNE~~	~~No~~	
14-009042 (CA-INY-7108H); FS# 05045302082	IND	HIS	Mining site	RE (Criterion A/1)	Yes	3

<table>
<tr><th>ID</th><th>PEA Section(s)</th><th>Deficiency</th><th>Response/Modified Text</th></tr>
<tr><td></td><td></td><td></td><td>
Table 5.5-1: Summary of Archaeological Resources within the Project Area
<table>
<tr><th>Resource</th><th>Landowner</th><th>Age[1]</th><th>Description</th><th>NRHP/CRHR Eligibility Recommendation[1,2]</th><th>Within Direct APE?</th><th>Project Segment</th></tr>
<tr><td>14-010900 (CA-INY-8330)</td><td>Private</td><td>HIS</td><td>Refuse scatter</td><td>RNE</td><td>Yes</td><td>3</td></tr>
<tr><td>14-012274 (CA-INY-9436); FS# 05045302222</td><td>INF</td><td>HIS/PRE</td><td>Campsite and refuse scatter; Lithic scatter (2 projectile points)</td><td>HIS: RNE; PRE: RNE</td><td>Yes</td><td>3</td></tr>
<tr><td>14-012314 (CA-INY-9451); FS# 05045302284</td><td>INF</td><td>PRE</td><td>Lithic scatter, hearth, and midden</td><td>RE (Criterion D/4)</td><td>Yes</td><td>3</td></tr>
<tr><td>14-012315 (CA-INY-9452); FS# 05045302285</td><td>INF</td><td>PRE</td><td>Midden (soil staining)</td><td>RE (Criterion D/4)</td><td>Yes</td><td>3</td></tr>
<tr><td>14-012317; FS# 05045302286</td><td>INF</td><td>HIS</td><td>Historic petroglyph</td><td>Unevaluated</td><td>Yes</td><td>3</td></tr>
<tr><td>14-012781 (CA-INY-9681)</td><td>Private</td><td>HIS/PRE</td><td>Refuse scatter; lithic scatter (1 flake)</td><td>HIS: RNE; PRE: n/a</td><td>No</td><td>1</td></tr>
<tr><td>14-012784 (CA-INY-9684)</td><td>Private</td><td>HIS</td><td>Refuse scatter</td><td>RNE</td><td>No</td><td>1</td></tr>
<tr><td>14-012785 (CA-INY-9685)</td><td>Private</td><td>HIS/PRE</td><td>Refuse scatter; lithic scatter (5 flakes)</td><td>HIS: RNE; PRE: RNE</td><td>No</td><td>1</td></tr>
<tr><td>14-012794 (CA-INY-9694); FS# 05045302558</td><td>INF</td><td>HIS</td><td>Refuse scatter</td><td>RNE</td><td>Yes</td><td>3</td></tr>
<tr><td>14-013405 (CA-INY-10084H)</td><td>BLM-Bishop</td><td>HIS</td><td>Refuse scatter</td><td>RNE</td><td>Yes</td><td>3</td></tr>
<tr><td>14-013514 (CA-INY-10147H)</td><td>BLM-Ridgecrest</td><td>HIS</td><td>Refuse scatter</td><td>Determined not eligible</td><td>Yes</td><td>3</td></tr>
<tr><td>26-004493 (CA-MNO-3970)</td><td>BLM-Ridgecrest</td><td>PRE</td><td>Lithic scatter</td><td>RE (Criterion D/4)</td><td>Yes</td><td>3</td></tr>
<tr><td>26-004495 (CA-MNO-3972)</td><td>BLM-Ridgecrest</td><td>HIS</td><td>Refuse scatter</td><td>RNE</td><td>Yes</td><td>3</td></tr>
<tr><td>~~26-004666 (CA-MNO-4137)~~</td><td>~~BLM-Bishop~~</td><td>~~PRE~~</td><td>~~Lithic scatter~~</td><td>~~RE (Criterion D/4)~~</td><td>~~No~~</td><td>~~n~~</td></tr>
<tr><td>~~26-008119 (CA-MNO-5803)~~</td><td>~~BLM-Bishop, Private~~</td><td>~~PRE~~</td><td>~~Lithic scatter~~</td><td>~~Determined not eligible~~</td><td>~~No~~</td><td>~~n~~</td></tr>
<tr><td>~~26-008374 (CA-MNO-6023)~~</td><td>~~BLM-Bishop~~</td><td>~~HIS~~</td><td>~~Refuse scatter~~</td><td>~~Determined not eligible~~</td><td>~~No~~</td><td>~~n~~</td></tr>
</table>
NOTES
1 → PRE: Prehistoric; HIS: Historic; HBE: Historic Built Environment
2 → RE: Recommended Eligible; RNE: Recommended Not Eligible
</td></tr>
<tr><td>CUL-4</td><td>Section 5.5.1.7.1.1.1</td><td>Records Search
It is stated that a heritage search was conducted in 2016 for the Inyo National Forest (INF) as part of a Hazard Trees Removal Program that included the Project corridor. Be explicit that it covered the entirety of the INF in the Project corridor orbriefly explain those portions that were covered.
A heritage search of BLM lands within the corridor also needs to be completed.Without this, the archival research is incomplete. Provide a copy of the heritagesearch as an appendix to the PEA.</td><td>PEA states the section that INF Heritage Search "encompassed the Project corridor". No change recommended.

BLM did not require a separate search of their heritage files. BLM reviewed and approved the report without noting missing information. No change recommended.</td></tr>
<tr><td>CUL-5</td><td>Section 5.5.1.7.1.2.2</td><td>APE Boundary
This section should focus only on the current APE and not include data that refersto the original APE. Inclusion of those data make it very difficult to sort out the data pertinent to the current Project description. While one might mention that the field survey included a larger APE, all information in this section needs to referonly to the current APE. Table 5.5-1 needs to be similarly revised; there is no needto list sites that are outside of the Project APE. Remove all information pertinent only to the original APE. Revise the third paragraph in this section to reflect thesechanges.</td><td>Text modified as follows:

~~5.5.1.7.1.2.2~~5.5.1.7.1.2.3 Field Survey
A total of ~~1,917.9~~1,588.8 acres were subject to pedestrian survey for the Project; an additional 329.1 acres within the originally defined APE but were then removed from the Project were also surveyed. Of these, 1,~~830.1~~523.1 acres (95%) were surveyed using standard transects. A total of 65.3 acres (3%) were unable to be surveyed within the White Mountains, primarily due to slope exclusion. This includes several portions of the western escarpment of the White Mountains, which overlook Silver Canyon, in addition to steep canyon walls within Wyman Canyon. Dense riparian thicket also excluded survey within a small portion of Wyman Canyon. Examples of unsurveyed areas are shown in Exhibits 3 through 5 and mapped in Appendix C of Wilson and Gilbert 2021. While unsurveyed, the nature of the terrain is such that archaeological resources are unlikely to be encountered in these areas. Several additional ancillary Project components, which extend outside of the ~~originally defined~~ APE as defined at the time of survey, were added after completion of the Phase 1 surveys and therefore were not surveyed as part of that effort unless they intersected with resources that were inventoried beyond the previous direct APE. Once Project engineering has been finalized, supplemental cultural resource surveys will be required for these areas.
In addition, several discontinuous areas within the Owens and Chalfant Valleys were unable to be surveyed, primarily</td></tr>
</table>

ID	PEA Section(s)	Deficiency	Response/Modified Text
			those that were located within areas of previous disturbance (21 acres; 1%) or heavy vegetation (1.5 acres; <1%). The former includes disturbed areas such as modern quarries or borrow pits, fenced staging yards, or corrals. The latter includes small areas of dense marsh or riparian vegetation near the Owens River. A total of ~~108~~ 74 new sites and ~~90~~ 58 new isolates were recorded as part of the Project surveys. Newly recorded resources include ~~51~~ 41 historic sites, 15~~28~~ prehistoric sites, and 1~~29~~8 multicomponent sites. Newly recorded isolates include ~~56~~ 29 prehistoric isolates and 29~~34~~ historic isolates. ~~Of the newly identified resources, 34 sites (13 prehistoric, 11 multicomponent, 10 historic) and 32 isolates (27 prehistoric, 5 historic) are located within the portion of the original APE which was subsequently removed from the Project scope of work.~~ A total of 33 previously recorded resources had been documented within the APE, including 13 historic sites, 6 prehistoric sites, 6 multicomponent sites, and 8 isolates. Of the 13 historic sites, 11 were relocated within the APE, 9 of which were updated as part of the Project. Of the six prehistoric sites, four were relocated within the APE and updated as part of the Project. Of the six multicomponent sites, five were relocated within the APE and updated as part of the Project. Of the eight isolates, one was relocated within the APE and updated as part of the Project, while two were relocated and turned into sites based on the presence of additional observed material. ~~Additionally, four previously recorded sites, including three prehistoric sites and one historic site, were updated as part of the Project, but are located within the portion of the original APE which was subsequently removed from the Project scope of work.~~ Two historic sites (14-007850; 14-012783/CA-INY-9683), one prehistoric site (14-003472/CA-INY-3472), and one multicomponent site (14-012782/CA-INY-9682) were determined to be located outside of the APE, and were not updated as part of the Project, while an earlier assessment of one prehistoric site (14-004500/CA-INY-4500) determined that it had been previously destroyed and built over. Survey observations also determined that two previously recorded resources, including one prehistoric resource (14-000259/CA-INY-259) and one historic resource (14-005683/CA-INY-5330H), are actually located within the APE, and were updated as part of the Project. Table 5.5-1 summarize all newly recorded or updated resources by the landowner, and provides National Register of Historic Places (NRHP)/California Register of Historical Resources (CRHR) eligibility and management recommendations. In total, ~~29~~ 21 sites (~~21~~ 13 prehistoric, 6 historic, and 2 multicomponent) and the prehistoric components of ~~16~~ 9 multicomponent sites are recommended as eligible, potentially eligible, have been found previously eligible, or are unevaluated. All eligibility recommendations were made based on surface evidence at the time of the survey; no Phase II archaeological testing was conducted. Recommendations for archaeological monitoring have also been made with respect to the current eligibility recommendations and Project design (see Wilson and Gilbert 2021 and Table 5.5-3). EI recommends that a Cultural Resources Management Plan (CRMP) be created and implemented during Project construction, which will incorporate any additional avoidance and/or mitigation measures based on future site evaluation results or updates to Project design (see CUL-1).
CUL-6	Section 5.5.1.7.1.2.2	**Eligibility Recommendations** Eligibility recommendations have been provided for 29 archaeological sites though it is not possible to know from previous text in this section that 29 is thetotal number of archaeological sites within the current project APE. Revisions based on Deficiency #CUL-5 should resolve that problem. Currently, there is no discussion about how the evaluation recommendations were derived. Typically, this would entail Phase II archaeological testing. Did such studies occur? Provide a detailed description about how evaluation recommendations were derived.	Please see modified text presented for ID CUL-5 above.
CUL-7	Section 5.5.1.7.2	**Built Environment Types** As with the archaeological resources, there is no discussion about the types of built environment resources within the APE. Provide a discussion on the built environment to Section 5.5.1.7.2.2 Results. While Table 5.5-2 describes each builtenvironment resource, a separate table listing resources type by segment also needs to be included.	New section added as below. 5.5.1.7.2.1.2 Built Environment Resource Types Common built environment resource types in the Project area include water conveyance, electrical power conveyance,

ID	PEA Section(s)	Deficiency	Response/Modified Text
			mining, transportation, homesteading and settlement, agriculture and ranching, and recreation. Water Conveyance: Property types associated with water resources generally fall into three broad categories: production and collection, treatment, and distribution. The most common type of water resource in the Project area are distribution features such as canals, ditches, and water control structures. Electrical Power Conveyance: Property types associated with electric power conveyance start with generation, followed by transmission, and ending with distribution. The most common type of electrical power resources in the project area are transmission lines. One of the most significant sites of this type in the Project area is the SCE Bishop Creek Hydroelectric System Historic District, a generation facility. Mining: While there is a bewildering range of individual features that might be encountered on mining property sites, most resources have some association with the three main processes of the mining industry: extraction of the raw ore from the earth, processing the ore for treatment (called benefaction), and refining which is enhancing the value of the mineral product until it reaches a final state. The most common mining site in the Project area are roads, which supported the mining operations, and the mines themselves. Transportation: Due to the linear nature of the Project corridor and the fact that transportation facilities are also linear, there are many locations where transportation resources cross the Project. These include roads, highways, and railroads. The Laws Narrow Gauge Railroad Historic District is listed on the National Register. Roads are the most numerous property type in the project area. Homesteading and Settlement: Property types associated with homesteads and settlements are broad. For early homesteads, these include houses, outhouses, water production and conveyance features such as wells and tanks, remains of agricultural fields and orchards, and stock raising buildings such as barns and corrals. Property types associated with townsites and urban development also cover a wide range. These start with basic residential and commercial buildings for housing and for business activities. There is a wide range of infrastructure associated with settlement that is part of the built environment. Agriculture and Ranching: As agriculture and ranching properties often started as homesteads, property types of domestic homes and production areas are like homesteading sites. A significant ranching resource in the project area is the Roberts Ranch Historic Site. Recreation: Property types for the recreation theme are varied and can range from rustic yet luxurious lodges to unimproved backcountry campsites. Although no specific recreational properties are in the APE, roads that provide access to popular recreational destinations such as US Highway 395, US Route 6 and State Route 168 were identified as significant for their association with this resource type. … 5.5.1.7.2.2 Results As part of desk and field survey activities, ~~111 built environment improvements were identified and observed within the APE. Of these,~~ 88 ~~are~~ historic-era (at least 45 years of age) built environment resources were identified and observed within the APE and ~~23 are contemporary period~~ (~~less than 45 years old;~~ Table 5.5-2). One previously recorded property could not be located, and one additional previously recorded property was not updated due to age ineligibility. Property types encompass the wide range of historic themes identified. These include water conveyance, electrical power conveyance, mining, transportation, homesteading and settlement, agriculture and ranching, and recreation. Of the 88 historic-era ~~improvement~~ resources, 73 directly intersect with the Project. All 88 historic-era ~~improvement~~ resources were evaluated for the NRHP/CRHR. Of these, 69 were recommended not eligible to the NRHP/CRHR and 19 were recommended eligible to the NRHP/CRHR (Table 5.5-2).

ID	PEA Section(s)	Deficiency	Response/Modified Text
			…

Table 5.5-2 modified as below:

Table 5.5-2: Summary of Built Environment ~~Improvement~~ Resources within the Project Area

Survey ID No.	Resource Name	Permanent Number	Other Listings	Ownership	Year Built (Approximate)	NRHP/CRHR Eligibility Recommendation	Within Direct APE	Project Segment
4	SCE Control-Silver Peak "A" & "C" (Zack Tap) 55 kV Transmission Line	None	None	Private	1968	RNE	Yes	4
5	~~Casdon~~ Canyon Road	None	None	Private	pre-1917	A/-/1	No	4
6	Access Road to SCE Control–Silver Peak "A" & "C" (Zack Tap) 55 kV Transmission Line	None	None	BLM	pre-1917	RNE	Yes	4
7	Petroglyph Road	None	None	BLM	1951-1962	RNE	No	4
15	Slim Princess Road	None	None	Private	pre-1917	A/-/1	No	4
16	Chalfant Road	None	None	Private	1964-1972	RNE	No	4
17	Chalfant Loop Road (Road to Chalfant)	None	None	Private	pre-1913	RNE	No	4
18	Tungsten Road	None	None	Private	pre-1913	RNE	No	4
19	Pumice Mill Road	None	None	Private	pre-1913	RNE	No	4
20	Rudolph Road	None	None	Private	1947-1949	RNE	No	4
22	LADWP Upper McNally Canal (North McNally Canal); LADWP Lower McNally Canal (South McNally Canal)	P-14-006756	None	Private	1877-1878	A/-/1	Yes	4
23	Jean Blanc Road	None	None	Private	pre-1913	RNE	No	4
24	Five Bridges Road	None	None	Private	1947-1949	RNE	Yes	4
27	Riverside Road	None	None	Private	pre-1913	RNE	Yes	3 and 4
29	Access Road to Control Plant 3 and 4 Transmission Line	None	None	Private	1905	RNE	Yes	1
30	SCE Control Plant 3 and 4 Transmission Line	None	None	Private	1908	RNE	Yes	1
31	1) SCE Bishop Creek Hydroelectric System Historic District – Control Substation Complex; 2) SCE Control Substation Office Building; 3) SCE Control Substation Operations Building; 4) Original Operations Building; 5) 5020 Plant 5 Road; 6) 5010 Plant 5 Road; 7) SCE Garage 1; 8) SCE Garage 2; 9) SCE Garage 3; 10) Powerhouse 5/Plant No. 5	1) P-14-~~005745~~ 2) ~~None~~ 3) P-14-~~005745~~ 4) P-14-~~005745~~ 5) ~~None~~ 6) ~~None~~ 7) ~~None~~ 8) ~~None~~ 9) ~~None~~ 10) P-14-005739	HAER No. CA-145	Private	1) ~~1908~~ 2) ~~1905~~ 3) ~~1919~~ 4) ~~1912~~ 5) 1931, ~~1930~~ 6) ~~1927~~ 7) ca. ~~1910~~ 8) ca. ~~1900~~ 9) ~~1936~~ 10) 1907	A/-/1	Yes	1

ID	PEA Section(s)	Deficiency	Response/Modified Text

Table 5.5-2: Summary of Built Environment ~~Improvement Resources~~ within the Project Area

Survey ID No.	Resource Name	Permanent Number	Other Listings	Ownership	Year Built (Approximate)	NRHP/CRHR Eligibility Recommendation	Within Direct APE	Project Segment
32	SCE Control-Morgan Plant 2 55 kV Transmission Line	None	None	Private	1908, 1927, 1968	RNE	Yes	1
33	SCE Control- Silver Peak "A" 55 kV Transmission Line (Nevada- California Power Company Bishop Creek to Tonopah 55 kV Aluminum Line)	None	None	Private	1905	A, 1	Yes	All
34	SCE Control- Silver Peak "C" 55 kV Transmission Line Nevada- California Power Company Bishop Creek to Tonopah 55 kV Aluminum Line)	None	None	Private	1908	A, 1	Yes	All
35	SCE Control-ML Tom 55 kV Transmission Line	None	None	Private	1966	RNE	Yes	1
36	Eastern Sierras Transmission Corridor (SCE Casa Diablo Control Sherwin 115kV TL)	None	None	Private	1913, 1958, 1987	RNE	Yes	1
37	SCE Casa Diablo Control 115kV Transmission Line	None	None	Private	1913, 1958	RNE	Yes	1
39	SCE Control-Plant 5-Plant 6 55 kV Transmission Line	None	None	Private	1913	RNE	Yes	1
40	Plant 5 Road	None	None	Private	1907	RNE	Yes	1
41	Plant 6 Road	None	None	Private	1913	RNE	Yes	1
42	Unnamed Road	None	None	Private	1968-1975	RNE	Yes	1
43	East Bishop Creek Road	None	None	BLM	pre-1913	A, 1	Yes	1
44	Bishop Creek Battleground Monument (Monument Series: California Registered Historical Landmark No. 811)	None	None	Private	1966	RNE	No	1
45	State Route 168 (Legislative Route 76)	None	None	BLM	1931	RNE	Yes	1
46	Ed Powers Road	P-14-012257	None	Private	pre-1913	RNE	Yes	1
47	LADWP Owens Gorge 230kV Transmission Line	P-14-012883	None	Private	1950-1952	RNE	Yes	1
48	Access Road to LADWP Owens Gorge 230kV Transmission Line (Power Line Road)	None	None	Private	pre-1913	RNE	Yes	1
50	Red Hill Road	None	None	Private	pre-1913	RNE	Yes	1
51	Water Retention Pond	None	None	Private	pre-1968	RNE	Yes	1
53	U.S. Highway 395 (North Sierra Highway)	P-36-007545, CA-SBR-7545H	Caltrans Scenic Highway	Private	1934	A, 1	Yes	2
55	LADWP Owens River Canal Access Road (Ed Powers Rehab - Road F57)	P-14-007090, CA-INY-6025H, P-14-007088, CA-INY-6023H	None	Private	1886	A, 1	Yes	1 and 2
56	Irrigation Flood Gate	P-14-007381	None	Private	Not Extant	RNE	Yes	3
57	Brockman Lane	None	None	Private	pre-1913	A, 1	Yes	3
58	Bishop Creek Road	None	None	Private	pre-1913	RNE	Yes	3
59	LADWP Jenkins Irrigation Ditch	P-14-008106	None	Private	1870-1920	A, 1	Yes	3
60	LADWP Bishop Creek Canal	P-14-008107	None	Private	1889	A, 1	Yes	3
61	Pole Livestock Corral	P-14-008105	None	Private	1950	RNE	Yes	3
63	Unnamed Road	None	None	Private	1949-1954	RNE	Yes	3
64	U.S. Highway 6 (LRN 76: The Grand Army of the Republic Highway)	None	None	Private	1937	RNE	Yes	3
65	Unnamed Road	None	None	Private	1913-1949	RNE	Yes	3
66	Unnamed Road	None	None	Private	pre-1913	RNE	Yes	3
67	Unnamed Road	None	None	Private	pre-1947	RNE	Yes	3
68	Unnamed Road	None	None	Private	pre-1947	RNE	Yes	3
70	Laws Frontage Road	None	None	Private	1947-1949	RNE	Yes	3
71	1st Street	None	None	Private	pre-1913	RNE	Yes	3
72	Silver Canyon Road	None	None	Private	pre-1913	A, 1	Yes	3
74	Railroad Street	None	None	Private	pre-1913	RNE	Yes	3

ID	PEA Section(s)	Deficiency	Response/Modified Text
			Table 5.5-2: Summary of Built Environment ~~Improvement~~ Resources within the Project Area <table><tr><th>Survey ID No.</th><th>Resource Name</th><th>Permanent Number</th><th>Other Listings</th><th>Ownership</th><th>Year Built (Approximate)</th><th>NRHP/CRHR Eligibility Recommendation</th><th>Within Direct APE</th><th>Project Segment</th></tr><tr><td>75</td><td>Unnamed Road</td><td>None</td><td>None</td><td>Private</td><td>pre-1947</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>76</td><td>Joe Smith Road</td><td>None</td><td>None</td><td>Private</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>77</td><td>Gish Avenue</td><td>None</td><td>None</td><td>Private</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>78</td><td>Laws Narrow Gauge Railroad Historic District (Monument Series: E Clampus Vitus, Slim Princess Chapter and the Inyo County Board of Supervisors)</td><td>P-14-004804, CA-INY-3514</td><td>None</td><td>Private</td><td>1883</td><td>A-/-1</td><td>Yes</td><td>3</td></tr><tr><td>79</td><td>Jordan Avenue</td><td>None</td><td>None</td><td>Private</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>80</td><td>Access Road to South McNally Canal</td><td>None</td><td>None</td><td>Private</td><td>pre-1947</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>81</td><td>Churchill Mine Road</td><td>None</td><td>None</td><td>Private</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>82</td><td>Laws Debris Road</td><td>None</td><td>None</td><td>Private</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>83</td><td>Unidentified Quarry</td><td>None</td><td>None</td><td>Private</td><td>pre-1947</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>84</td><td>Flynn Road</td><td>None</td><td>None</td><td>BLM</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>85</td><td>Silver Canyon Mine (U.S. Forest Service Site: #05045302082)</td><td>P-14-009042, CA-INY-7108</td><td>None</td><td>INF</td><td>pre-1913</td><td>RNE</td><td>No</td><td>3</td></tr><tr><td>87</td><td>White Mountain Road</td><td>None</td><td>None</td><td>INF</td><td>1947-1954</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>88</td><td>Mileage Marker</td><td>P-14-012317, CA-INY-002286</td><td>None</td><td>INF</td><td>1905-1907</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>89</td><td>Unnamed Road</td><td>None</td><td>None</td><td>INF</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>90</td><td>Roberts Ranch Historic Site</td><td>P-14-008566, CA-INY-6725</td><td>None</td><td>INF</td><td>1904-1921</td><td>A-/-1</td><td>Yes</td><td>3</td></tr><tr><td>91</td><td>Wyman Creek Road</td><td>P-14-009253, CA-INY-007234</td><td>None</td><td>INF</td><td>pre-1913</td><td>A-/-1</td><td>Yes</td><td>3</td></tr><tr><td>92</td><td>Unnamed Road</td><td>None</td><td>None</td><td>INF</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>93</td><td>Unnamed Road</td><td>None</td><td>None</td><td>INF</td><td>1947-1951</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>94</td><td>Unnamed Road</td><td>None</td><td>None</td><td>INF</td><td>1953-1975</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>95</td><td>Unnamed Road</td><td>None</td><td>None</td><td>INF</td><td>1953-1975</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>96</td><td>Access Road to the Deep Springs P.S. 562-563-55 kV Transmission Line</td><td>None</td><td>None</td><td>Private</td><td>1917-1930s</td><td>RNE</td><td>Yes</td><td>5</td></tr><tr><td>97</td><td>Deep Springs Maintenance Station (Parcel ID#016-070-02)</td><td>None</td><td>None</td><td>Private</td><td>pre-1947</td><td>RNE</td><td>No</td><td>5</td></tr><tr><td>98</td><td>SCE Deep Springs Substation Complex</td><td>None</td><td>None</td><td>Private</td><td>1917-1930s</td><td>RNE</td><td>No</td><td>5</td></tr><tr><td>99</td><td>SCE Deep Springs P.S. 562-563-55 kV Transmission Line</td><td>None</td><td>None</td><td>Private</td><td>pre-1947</td><td>RNE</td><td>Yes</td><td>5</td></tr><tr><td>100</td><td>Deep Springs Ranch Road</td><td>None</td><td>None</td><td>Private</td><td>1913-1927</td><td>A-/-1</td><td>No</td><td>5</td></tr><tr><td>101</td><td>Deep Springs College</td><td>None</td><td>None</td><td>Private</td><td>1917</td><td>A-/-1</td><td>No</td><td>5</td></tr><tr><td>102</td><td>Lincoln (Silver Dome, Fringe Benefit No. 1) Mine</td><td>P-14-005683, CA-INY-5330H</td><td>None</td><td>Private</td><td>1915-1945</td><td>A-/-1</td><td>Yes</td><td>3</td></tr><tr><td>103</td><td>Oasis Road</td><td>None</td><td>None</td><td>BLM</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>104</td><td>Eureka Valley Road</td><td>None</td><td>None</td><td>BLM</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>105</td><td>Canyon Road</td><td>None</td><td>None</td><td>BLM</td><td>pre-1913</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>106</td><td>Ranch Road</td><td>None</td><td>None</td><td>Private</td><td>1948-1952</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>107</td><td>State Route 266 (Legislative Route 63; Route 168)</td><td>None</td><td>None</td><td>BLM</td><td>1931</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>108</td><td>State Line Road</td><td>None</td><td>None</td><td>BLM</td><td>1952-1958</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>109</td><td>Power Line Road</td><td>None</td><td>None</td><td>Private</td><td>pre-1952</td><td>RNE</td><td>Yes</td><td>3</td></tr><tr><td>110</td><td>Unnamed Road</td><td>None</td><td>None</td><td>Private</td><td>pre-1952</td><td>RNE</td><td>Yes</td><td>3</td></tr></table>
CUL-8	Sections 5.5.1.7.2 and 5.5.1.7.2.1.1	**Records Search** Presumably, the record search results from the Eastern Information Center (asdescribed in Section 5.5.1.7.1.2.1 Records Search results) were included in thiseffort. The use of record search data needs to be specified in this section.	5.5.1.7.2.1.1 Desk Survey In advance of the field survey effort, Urbana prepared a desk survey to identify all built environment ~~improvement~~ resources in the vicinity of the Project. Additionally, Urbana reviewed the results of the EIC records search. The desk survey included use of current aerial imagery (obtained from Google Earth Professional), review of historic aerial imagery, ca. 1974-1975 (obtained from the USGS Earth Explorer database), and Mono and Inyo County Assessors' Data. The year-built data were derived for all observed improvement resources using these cited sources. Additionally, Urbana reviewed the results of the EIC records search described in above in Section 5.5.1.7.1.1.1, for any previously recorded built environment resources. This allowed the identification of ~~The list of observed improvements was then sorted into~~ "historic-era" built environment resources (prior to 1975) ~~and "contemporary period" (post 1974)~~. The locations of historic-era ~~improvement~~ resources were overlaid against the Project corridor to identify what ~~improvement~~ resources directly intersect with the direct APE. A ½-mile radius was established from the outside edge of the Project corridor to form the Indirect APE. Maps delineating the APE survey boundaries, with all built environment ~~improvement~~ resource locations depicted, are included as
CUL-9	Section 5.5.1.7.2 Table 5.5-2	**Built Environment Resources** Replace "improvement" with "resource" throughout this section to avoid confusion; resource should be applied to both elements of the built environment and archaeological resources.	5.5.1.7.2 Built Environment Resources Urbana conducted a Class III historic-era built environment survey for the Project (Urbana 2019). The study included a desk survey and a pedestrian survey for built environment ~~improvement~~ resources in the direct APE for the Project.

ID	PEA Section(s)	Deficiency	Response/Modified Text
CUL-10	Section 5.5.1.7.2.2 Table 5.5-2	**Resource Evaluation** Only resources that were of sufficient age are to be recorded and evaluatedshould be discussed in this section. Remove all references to those resources that are not at least 45 years old. This also applies to Table 5.5-2. Given the inclusion of archaeological sites in the original APE in Section 5.5.1.7.1.2.2, it begs the question about whether such resources are also includedin the tally for built environment resources, although it is not stated. Reference toresources in the original APE, but not in the current APE (whether that be in resource totals or in Table 5.5-2), need to be removed, if present. Similar to the archaeological resources, provide a discussion about how theevaluation recommendations were determined.	All references to contemporary properties (those less than 45 years of age) have been removed from the PEA and tables. See response to ID CUL-8 above and modifications to Table 5.5-2. Counts for archeological resources were not included in BE counts for the HBER. A discussion about how the built environment evaluation recommendations were determined is addressed in the response to ID CUL-6.
CUL-11	Section 5.5.2.1.1	**Federal Regulations/Policies** Both the U.S. Forest Service and the Bureau of Land Management have regulations/policies for addressing cultural resources on their lands in addition to the national laws and regulations listed in this section. Provide a list of applicableagency-specific regulations. In addition, include a discussion of the Archaeological Resources Protection Act.	New sections added as below. 5.5.2.1.1.1 Archeological Resources Protection Act Enacted in 1979, the Archaeological Resources Protection Act (ARPA) provides for the protection of archaeological resources more than 100 years old that occur on federally owned or controlled lands. The statute makes it unlawful to excavate and remove items of archaeological interest from federal lands without a permit, and it defines the process for obtaining such a permit from the responsible federal agency. This process includes a 30-day notification to interested persons, including Native American tribes, by the agency to receive comments regarding the intended issuing of a permit. The law establishes a process for prosecuting persons who illegally remove archaeological materials from lands subject to ARPA. The law also provides for curation of archaeological artifacts, ecofacts, notes, records, photographs, and other items associated with collections made on federal lands. Standards for curation are provided for in regulations at 36 CFR Part 79. 5.5.2.1.1.2 Organic Act The Organic Act of 1897 is the original organic act governing the administration of National Forest System (NFS) lands. It is one of several Federal laws under which the Forest Service operates. Under this act, the Secretary of Agriculture may make regulations and establish services necessary to regulate the occupancy and use of National Forest System lands and preserve them from destruction. Persons violating the act or regulations adopted under it are subject to fines or imprisonment. The Organic Act is one authority used to issue Permits for Archaeological Investigations. 5.5.2.1.1.3 Federal Land Policy and Management Act The Federal Land Policy and Management Act (FLPMA) of 1976 is often called the BLM's organic act, since it authorizes the BLM to do a lot of the things it does on a daily basis. Through FLPMA, Congress formally recognized what BLM had been doing for many years: managing public lands under the principles of multiple use and sustained yield. FLPMA did much more, though as it granted BLM new authorities and responsibilities, amended or repealed previous legislation, and prescribed specific management techniques. The six most important parts of FLPMA are that it: • Mandates the permanent federal ownership of public lands. • Declares that BLM will manage public lands for multiple uses and values. • Repealed more than 1,000 out-of-date land management statutes, replacing them with new policies, including a new planning system. • Changed how BLM manages minerals and grazing in public lands. • Mandated new forms of preservation and protection for public lands. • Helped to usher in a cultural change in the BLM.

ID	PEA Section(s)	Deficiency	Response/Modified Text
CUL-12	Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	**Archaeological Survey Report** Several of the comments for the Cultural Resources chapter of the PEA aredirectly relevant to the Archaeological Survey Report: ▪ CUL-3 ▪ CUL-4 ▪ CUL-6 (Only discussion about how the evaluation recommendations were derived. This discussion needs to be robust in the survey report.) ▪ CUL-10	For CUL-3, as the Class III report is a technical document meant for a technical reviewer only, the terms are already common to the reviewer. No change recommended for the Class III report. For CUL-4, see response to the original comment. No change recommended for the Class III report. For CUL-6, see response to the original comment. Adding the additional information in the comment will not change the eligibility recommendations for the resources. No change recommended for the Class III report. For CUL-10, this is a comment for the built environment sections of the PEA and not relevant to the Class III report. No change recommended.
CUL-13	Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	**Section 4.3 Research Themes/Section 4.3.1 Prehistoric Research Themes/ Pages 38-39** This section notes that prehistoric archaeological sites are most often evaluatedunder Criterion D/4, for their potential to yield important information that may contribute to our understanding of prehistory. While this is generally true, application of the other eligibility criteria cannot be entirely dismissed; all shouldbe at least mentioned, and it should be noted that additional research themes may surface during additional studies that would be addressed those criteria. Numerous sites in the project area contain petroglyphs, which may be tied to Criteria A/1 or C/3. Additional research themes do not necessarily need to beadded, but others need to be acknowledged in addition to saying that thosepresented “are not exhaustive.”	Adding the additional information in the comment will not change the eligibility recommendations for the prehistoric resources. No change recommended for the Class III report.
CUL-14	Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	**4.3.2 Historic Research Themes / Page 38** Like comment CUL-12, provide similar discussion for historic era archaeologicalsites.	Adding the additional information in the comment will not change the eligibility recommendations for the historic resources. No change recommended for the Class III report.
CUL-15	Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	**Resource Evaluation** Site FS# 05045302546 (CSP-Site-310) contains a sparse scatter of historic refuse. Astanding cabin is also present. Research indicates the cabin was built sometime prior to 1951. The archaeological report specifically states that the cabin was notevaluated and should be evaluated by an architectural historian. Urbana did not evaluate the cabin. Revise the report to include an evaluation of the cabin,consistent with all of the other built environment resources along the Project route.	The cabin will be evaluated by Urbana as a multi-discipline site and information updated.
CUL-16	Appendix D Historic Era Built Environmen t Survey Report	**Period of significance - Global throughout Sections 4 and 5** The report accurately identifies historic themes (consisting of a topic, geographical area, and time period) as a crucial element of historic context. Theme-related time periods, or periods of significance, are included, but they are not appropriately justified and appear to have been assigned arbitrarily. A period of significance should be chosen based upon the narrative history relatedto a theme as well as the construction dates of historic-era resources within APE. The narrative history provided should then be limited to the period of significanceoutlined (example: for “Water Conveyance Systems, Owens Valley, 1870s-1930s” the narrative history begins with Native American irrigation systems constructed prior to 1850 and extends to the 1970s. No explanation of or justification for the beginning or ending dates is provided, and the period identified does not matchthe period discussed.) Furthermore, periods of significance (such as the example above) are overly long for most of the themes	Periods of significance will be revised to match themes and identified resources more closely. Periods of significance for all significant sites will be narrowed based on the sub-themes used in the BE report. These periods of significance can more closely match Caltrans and other agency guidance.

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		identified; a period of significanceshould break down historic context data into meaningful eras to aid understanding rather than attempting to cover an extended period of change over time. Revise the period of significance for each of the themes outlined such that they: ▪ encompass the entire era discussed in each narrative history ▪ cover periods short enough to organize historic context data into meaningful eras that are easily understandable by the reader. (Consider using previously established contexts/periods such as those developed by the California Department of Transportation [Caltrans].) ▪ both begin and end at dates that ○ mark the start/end of an era based on a historical event AND/O ○ mark the construction date of an important resource within the ○ APE	
CUL-17	Appendix D Historic Era Built Environmen t Survey Report	**Document structure Report sections 4 and 5** The purpose of a historical overview of the geographic area is not distinct fromtheme-based historic context. Separation into two sections creates confusion and makes the information difficult for the reader to process. Revise the historic context section to incorporate local historic contexts currentlylocated in Section 4. They fit most naturally into the theme of homesteading andsettlement.	No Change Recommended. The community histories provide general history of places in the vicinity of the APE. Urbana prefers to retain most of the community histories. Some clarifications could be added. Not all of these descriptions are related to homesteading and settlement.
CUL-18	Appendix D Historic Era Built Environmen t Survey Report	**Explanation of source document development Global throughout document** Remove explanation of development of Caltrans context, OHP guidance, NRHPguidance, and other sources throughout report; the historiography of these documents is primarily of interest to cultural resource management professionalsor students and does not aid in the evaluation of historical resources or assessment of impacts to resources. It is sufficient to cite these documents, the reader does not require an explanation of when/why they were created or of the strengths and weaknesses of each document.	This information will be deleted from a revised version of the HBER.
CUL-19	Appendix D Historic Era Built Environmen t Survey Report	**Use of “improvement” Global throughout document** Historic-era elements of the built environment are typically described as “resources” in cultural resource management reports. Change “improvements” to “resources” throughout the document to avoid confusion; reserve the use of “improvement” for value judgements and quotes.	“Improvements” will be changed to “cultural resources” or “resources” throughout the report.
CUL-20	Appendix D Historic Era Built Environmen t Survey Report	**Use of “cultural properties” Global throughout document** This term appears to reference both archaeological and built-environment resources within the project area. Use of this term creates confusion since it is similar to "traditional cultural properties" and "historic properties" (which references resources eligible to the National Register of Historic Places). Revisethis language to "cultural resources" to conform to typical cultural resource management practice and avoid confusion.	“Cultural properties” will be changed to “cultural resources” or “resources” throughout the report.
CUL-21	Appendix D Historic Era Built Environmen t Survey Report	**Significance criteria, character-defining features, and integrity thresholds Globalthroughout Sections 4 and 5** Each theme developed in the historic context requires the addition of significance criteria, character-defining features, and integrity thresholds. As withresource types, these are essential elements of a historic context, are critical to the purpose of historic context/theme development, and can be borrowed fromexisting historic context statements. Revise themes accordingly.	Refinement of the historic contexts to include detailed information on significance criteria, character defining features, and integrity thresholds for each theme will be included in a revised version of the HBER.
CUL-22	Appendix D Historic Era Built Environmen t Survey Report	**Geographic areas Global throughout Sections 4 and 5** Historic context sections focus almost exclusively on Owens Valley. Chalfant Valley and other locations within project area must be explicitly included in thematic contexts, or an explanation of why these locations are not relevant toeach theme must be included.	The historic contexts will be revised to achieve better geographic balance between the location descriptions in the APE.

ID	PEA Section(s)	Deficiency	Response/Modified Text
CUL-23	Appendix D Historic Era Built Environmen t Survey Report	**Biographical information Global throughout Sections 4 and 5** An individual mentioned in the historic context should receive a brief narrative biography. For a widely known public figure this can be a single sentence, although it must include dates and the most salient facts about the individual. For example: "Thomas Edison (1847 – 1931), often described as America's greatest inventor, pioneered electrical power generation and distribution duringthe 1870s and 1880s." For a person who is not widely famous and may only be locally significant, see the methodology described below in relation to John Lubken. Use this methodology throughout the document; if an individual is important enough to be named in the historic narrative, that individual merits biographical information to allow the reader understand how they fit into the historic context. Addition of this information is critical to provide the historic context for evaluation of resources under criterion B/2.	Additional biographical information will be included for individuals significant at the national, state, or local level.
CUL-24	Appendix D Historic Era Built Environmen t Survey Report	**Historic context: Property/ resource types Global throughout section 5** Each theme developed in the historic context requires the addition of a section defining resource/property types; development of resource types is crucial to the purpose of a historic context; that is, the evaluation of specific historic era resources within each context/theme. Conversely, if no resources are associated with a particular theme, such a theme can be eliminated or shortened. The draft themes as developed include minimal information about resource types; all potentially eligible resource types that may occur in the project area and are associated with a particular theme must be listed with that theme. Develop adequate resource/property type documentation for each theme. It is not sufficient to mention that property types associated with a theme may be eligible; each individual property type must be listed and described. Caltrans historic contexts or other widely-used historic context statements may provide examples. Detailed comments on section 7, property type discussion below, provide a template for how to develop the necessary property type section for each theme if sources such as Caltrans contexts are insufficient.	As noted in comment CUL-21 above, refinement of the historic contexts to include detailed information on significance criteria, character defining features, and integrity thresholds for each theme will be included in a revised version of the HBER.
CUL-25	Appendix D Historic Era Built Environmen t Survey Report	**Historic context: Theme 1: Water Conveyance, 1870s-1930s (27-29)** Justify/break up periods of significance as discussed above. Revise the discussion of Native American irrigation structures in the area. The draft cites a single source and uncritically accepts its contradictory claim that indigenous groups developed extensive irrigation systems yet did not practiceagriculture. The Caltrans water conveyance context provides a more detailedand nuanced explanation of local indigenous irrigation works and should be consulted in order to add required detail and make this discussion more accurate. It is crucial to more fully develop this theme in order to distinguish potential irrigation-related resources that predate Euro-American settlement. Discussion of early Euro-American irrigation structures must be introduced in the context of settlement and agricultural development in the region, including a brief explanation of the types of agriculture undertaken. The current draft does not explain the use of ditches and diversions. Provide a separate section for Los Angeles Department of Water and Power's (LADWP's) acquisition of water rights in Owens Valley and subsequent development of the Los Angeles aqueduct, an extraordinarily important theme.Utilize multiple sources including the Caltrans water conveyance context and other sources as necessary to develop additional detail and identify periods of significance based on events. The current draft begins the discussion of this context in the middle of the paragraph, making it difficult for the reader to identify as significant.	Changes will be made in a revised HBER to modify the water conveyance periods of significance in accordance with the sub-themes, include more information on Native American irrigation, explain early methods of water conveyance, and expand the discussion of Los Angeles Aqueduct in Owens Valley.
CUL-26	Appendix D Historic Era Built Environmen t Survey Report	**Historic context: Theme 2: Electric Power Conveyance, 1900-1964 (28-30)** The historic context provided is too brief and lacks adequate detail as aframework for evaluation of electrical power-related resources, revise asdescribed below. Limit property types to elements of the built environment. Although fuel supply systems may be potentially eligible property types, as written the draft suggeststhat fuel such as oil or coal is itself a property type, this is incorrect. The importance of the development of electric power to human history and a brief discussion of its most famous	SCE has developed a historic context for its electrical system and any changes needed will be incorporated into a revised report.

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		originators is included; expand with biographical introduction of the originators of electrical power as well as dates,which are crucial to an understanding of its development. The historic narrative begins in 1900, 14 years after establishment of SCE's parentcompanies; the history of how and why the company was formed is directly relevant to evaluation and must be at least briefly summarized. (Much as this context seems to have been researched and developed, and is included in theDPR 523 forms, this information must be included in the historic context themes.) Although Henry Huntington and an engineer are mentioned in the contexts, there is insufficient detail on the people who drove development of electrical power resources in the APE. Include additional important individuals in the narrative; utilize methodology described above in order to provide a frameworkfor evaluation under criterion B/2. Beginning/end of Period of Significance appear to have been chosen arbitrarily as the start of the period of significance (see above global document comment); the first local resource discussed was constructed in 1904. Revision of overly long and arbitrarily chosen periods of significance will help with documentorganization and allow the reader to better understand a complex story that takes place over more than half a century. Include a very brief outline of the development of Southern California cities, suchas Los Angeles, to provide an understanding of the population growth and urbandevelopment that both drove the development of electrical power resources and was in turn stimulated by its availability. The Nevada Power Mining and Mining Company (NPMMC) appears to have developed the early infrastructure; provide detailed historical background onthe NPMMC as a framework for evaluation of these resources. The section is disorganized and essentially consists of a chronological list of events. Thematic headings and shorter periods of significance will help organizethe data. Specific development events in Owens Valley should follow the more general contextual history and biographical sections. The events listed need explanation/analysis that allows the reader to understand their importance. The narrative mentions Edison Electric's service to 600,000 people in 1909 as an "expanded presence" without any preamble that would allow the reader to understand what it was expanded from. Nor is there any explanation of what (if any) role the Owens Valley electrical resources developed in the years leading up to 1909 played. Likewise, the Big Creek hydroelectric system is mentioned without an explanation of where it is located or why it was developed. Revise thetext to fill in the data gaps as identified above.	
CUL-27	Appendix D Historic Era Built Environmen t Survey Report	**Historic context: Theme 3: Mining, 1850s-1960 (33-35)** Remove discussion of source documents from introduction (as discussed above)and replace with a synthesis of themes and property types discussed in these documents. Utilize geographical, thematic, and temporal headings in order to organize datainto a comprehensible and usable form; for example, "Gold Mines, 1859 – 18XX,"or "Deep Springs Mines, 1866 – 19XX." Ideally, these subsections would follow an introduction outlining the seminal events/dates related to mining in the region.	The HBER mining context text will be revised to complete the organizational changes identified here.
CUL-28	Appendix D Historic Era Built Environmen t Survey Report	**Historic context: Theme 4: Exploration, Transportation and Travel Pathways, 1860sto 1961 (36-46)** Remove discussion of source documents from introduction (as discussed above)and replace with a synthesis of themes and property types discussed in these documents. Utilize geographical, thematic, and temporal headings in order to organize datainto a comprehensible and usable form. Reorganize and edit this theme in order to focus on the project area. Although some general California history is necessary to the understanding of the development of transportation resources in the project area, the current draft has a large amount of irrelevant detail that distracts from the purpose of the section. For example, the discussion of the Spanish and Mexican era must be shortened to no more than two paragraphs. Since they did	The HBER text will be revised to make the organizational changes and fill in the data gaps identified here.

ID	PEA Section(s)	Deficiency	Response/Modified Text
		not utilize the interior of the state, the list of coastal missions as well as the description of explorations that did not enter the project area need to be removed. The basic outline of events and their dates can be consolidated into a much more focused narrative. This principle should also be applied to the other subsections, including(but not limited to) removal of the irrelevant discussion of establishment of the border with Mexico. Early Transportation in the Mono and Inyo counties, 1860-1910 (page 42) is an example of a period of significance that must be revised; an end point of 1910simply does not make sense in a discussion of wagon roads. Avoid use of temporal descriptors like “eventually;” they should be replaced with specific dates or at least decades.	
CUL-29	Appendix D Historic Era Built Environmen t Survey Report	**Historic context: Property/ resource types Global throughout section 5** Each theme developed in the historic context requires the addition of a section defining resource/property types; development of resource types is crucial to the purpose of a historic context; that is, the evaluation of specific historic era resources within each context/theme. Conversely, if no resources are associated with a particular theme, such a theme can be eliminated or shortened. The draft themes as developed include minimal if any information about resource types; all potentially eligible resource types that may occur in the project area and are associated with a particular theme must be listed with that theme. Develop adequate resource/property type documentation for each theme. It is not sufficient to mention that property types associated with a theme may be eligible; each individual property type must be listed and described. Caltrans historic contexts or other widely-used historic context statements may provide examples. Detailed comments on section 7, property type discussion below, provide a template for how to develop the necessary property type section for each theme if sources such as Caltrans contexts are insufficient.	As noted in comment CUL-21 and CUL-24 above, refinement of the historic contexts to include detailed information on significance criteria, character defining features, and integrity thresholds for each theme will be included in a revised version of the HBER. Note – this appears to be a duplicate of comment CUL-24.
CUL-30	Appendix D Historic Era Built Environmen t Survey Report	**Historic context: Theme 6: Homesteading and Settlement, 1862-1950s (50-52)** Introduce the section with a paragraph about the native American settlementsin the region. This history can be brief but should include the names of the localtribes, their language family, and descriptions of their methods of subsistence, style/material of their houses, and locations of their principal villages within or adjacent to the project area. Explain the distinction between agriculture and ranching. The period of significance for this section is not appropriate, as settlement activities in California were generally suspended by about 1890. If the period was longer in this area explain why and when it ended; 1950, however, is unlikely to be the end of this period of significance. Consider shortening this section and making it part of theme 5 since it includes little information that does not relate to settlement driven by ranching and agriculture. If the section is retained, the current text should form an introductionwith the local histories from section 4 should be incorporated afterwards.	The HBER text will be revised to make the organizational changes and fill in the data gaps identified here.
CUL-31	Appendix D Historic Era Built Environmen t Survey Report	**Historic context: Theme 7: Recreation, 1910s-1950s (53-58)** Only two property types are mentioned in association with this theme: rustic lodges and unimproved backcountry campsites. Lodges must be more fully described and developed, and subtypes included; the project area is likely to have fishing lodges, hunting lodges, and perhaps other types. Additional resource types in the project area may include vacation cabins, trailer parks, developed campgrounds, interpretive sites, parks, boat launching sites, and perhaps other resource types. This section should be informed by field work and a complete list of resource types included. Furthermore, there are apparently subsections of the recreation theme, such as filmmaking, that are not associatedwith any extant historic age properties. Such sections are not relevant to the purpose of a historic context (evaluation of resources) and should be removed. The section mentions several times that tourism increased after World War II, but this fact is not sufficiently explained or placed in context. Revise the text, addingcontributing factors such as improvements in roads, ubiquity of personal automobiles, rising incomes, and/or other historical factors contributed to the increase in	As noted in other responses above, additional information on recreational property types will be included in a revised HBER. The themes are general contexts to describe broad historic patterns in the area the project corridor runs through. They are to give background for those locations that are within the APE. The information on filmmaking was included to provide a context for recreational tourism near the project area. Likewise, the information on Devils’s Postpile is included to inform the overall context of recreational tourism in the area. Amateur mining activities such as prospecting, metal detecting, and rock hounding are included as these, too, contribute the overall recreational context.

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		tourism. Remove discussion of Devil's Postpile, rainbow falls, and any other locations which are outside the project area and marginally relevant (page 54). Details about the history of mining should be removed from this section and added to the mining section. Only facts directly relevant to the recreation theme, such as the use of mining roads to provide access to local attractions,should be included in this section (pages 54 – 55).	
CUL-32	Appendix D DPR 523 Forms	**DPR 523 Forms – Basic Methodology** Department of Parks and Recreation (DPR) 523 forms consist of recordations andconclusory statements regarding eligibility and do not properly evaluate the resources within the established historic themes. Every evaluation must place a property in its historic context to support that resource's significance. In particular, the information about the period, the place, and the events that created, influenced, or formed the backdrop to the historic resources. The discussion of historic context should describe the history of the community wherethe resource is located as it relates to the history of the resource. An adequate evaluation must describe: ▪ The specific aspect of the prehistory or history that the resource represents. ▪ Whether that prehistory or history is significant. ▪ Whether the resource possesses the physical features necessary to convey the aspect of prehistory or history. ▪ If the resource is historically significant (eligible for the California Register of Historical Resources), the integrity of the resource must also be described. ▪ Integrity – o Location – the place where the resource was constructed or where the historic event occurred o Design – the combination of elements the create the form, plan, space, and style of the resource o Setting – physical environment of a resource o Materials – the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form the resource o Workmanship – the physical evidence of the crafts or a particular culture or people during any given period in history or prehistory o Feeling – a resource's expression of the aesthetic or historic sense of a particular period of time o Association – the direct link between an important historic event or person and the resource	Revisions for these issues identified by the CPUC will result in revised DPR forms and impacts / effects analysis.
CUL-33	Appendix D DPR 523 Forms	**DPR 523 Forms – Language** Use "is recommended" eligible/ineligible rather than "appears."	This language will be revised to indicate if resources are "recommended eligible / ineligible for listing on the NRHP / CRHR."
CUL-34	Appendix D DPR 523 Forms	**DPR 523 Forms – Organization** The DPR form submission currently does not meet professional standards. Although many resources are documented as part of the Bishop Creek Hydroelectric System Historic District, the "D" form for district documentation hasnot been utilized correctly. This part of the submission must be much more carefully organized in order to allow the reader to understand what is being evaluated. Evaluation of the district should begin with a District primary record followed by a District DPR form. Technically, each element of the district shouldalso receive its own primary form. If another method can be found to clearly identify each element, a primary may not be necessary for every single contributing element, but the current organization, which treats resources in clusters, does not meet industry standards. A table listing every contributing element that is evaluated along with	Revisions for these organizational issues identified by the CPUC will result in revised DPR forms for these specific resources and all forms will be reviewed with resulting changes made as necessary for issues as outlined here.

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		its build date, eligibility status, etc. would be a good starting point. The “Control Plant Four-Control Plant Three 115 KVA Sub- Transmission Line” DPR isan example of the aforementioned issues. Although the 11-page form documents the transmission line, as well as several historic-era plant buildings, only the transmission line is evaluated in the significance section. Figures are not numbered, and historic figures are mixed with recent field photography. Not every resource documented has been documented with field photography. (These deficiencies are in addition to the failure to evaluate within the historic context described above.)[1] General organization problems: Multiple copies of some forms appear to be included. Inclusion of extensive sections of digitized historic sources distracts from the goal of evaluating resources rather than enhancing understanding for the reader. Historic source material should have been utilized by the historians who prepared the forms as references, and its data analyzed and synthesized in the form. Exhibits should only be included as attachments when they visually illustrate something that could not be adequately synthesized by historian (for example, historic-era photos or building plans). Furthermore, the size and resolution of many of these exhibits is such that they are unreadable. Methodology is inconsistent: some forms include extensive historic context sections that are footnoted, but most do not; some forms include integrity assessments while most do not. Methodology must be consistent across the DPRsattached to the report.	
5.6 Energy (EN)			
EN-1	Section 5.6.1	**Environmental Setting** The PEA does not provide enough detail regarding the energy setting. Revise thesection to include the following: ▪ Add helicopter fuel which is discussed in 5.6.4.3. ▪ Grid power/generators are mentioned in Section 5.6.4.3.3 but not earlier in the intro of Section 5.6.1 or in Section 5.6.4.1. ▪ Provide clarification that no EVs or other alternative fuel vehicles or equipment be used during construction or O&M.	No changes to the PEA are proposed or necessary. The Guidelines identify the following as being the totality of information necessary for the Environmental Setting in Section 5.6: “5.6.1.1: Existing Energy Use. Identify energy use of existing infrastructure if the proposed project would replace or upgrade an existing facility.” The text in Section 5.6.1.1 addresses the energy use of the existing infrastructure, and thus meets the requirements of the Guidelines. Grid power, as it relates to existing infrastructure, is addressed in Section 5.6.1.1. The mention of grid power/generators in Section 5.6.4.3.3 is related to construction, and not to existing infrastructure; therefore these uses of grid power/generators are not addressed in Section 5.6.1.1. Similarly, helicopter fuel is not addressed in Section 5.6.1.1 as helicopter fuel is not part of the energy use of existing infrastructure. SCE cannot, at this time, provide clarification that EVs or other alternative fuel vehicles or equipment will not be used during construction or O&M. The O&M phase of the CSP Project may run to a century or longer, and it is entirely likely that non-ICE vehicles will be used for O&M activities along the CSP Project alignment in the coming 100 years.
EN-3	Section 5.6.2.1.2	**GHG policies** Provide applicable GHG policies or provide a reference to GHG section for applicable policies. The reader should be directed to relevant information if it isin another chapter/section. Revise to include applicable CPUC energy programs.	NOTE: The amendments to Section 5.6.2.1.2 shown below are taken from an Initial Study developed by the CPUC for a similar electrical transmission infrastructure project. Any additional entries may be incorporated by the CPUC in its CEQA documentation. 5.6.2.1.2 State ~~Senate Bill 100, signed into law in September 2018, amends the California Renewables Portfolio Standard Program. The Program requires the CPUC to establish a renewables portfolio standard requiring all retail sellers to procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 25 percent of retail sales by December 31, 2016, 33 percent by December 31, 2020, 40 percent by December 31, 2024, 50 percent by December 31, 2026, and 60 percent~~

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			~~by December 31, 2030. The program additionally requires each local publicly owned electric utility to procure a minimum quantity of electricity products from eligible renewable energy resources to achieve the procurement requirements established by the program.~~ 5.6.2.1.2.1 Warren-Alquist Act The 1975 Warren-Alquist Act (Pub. Res. Code §25000 et seq.) established the California Energy Resources Conservation and Development Commission, now known as the California Energy Commission (CEC). The Act established a state policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The Act also was the driving force behind the creation of CEQA Guidelines Appendix F, Energy Conservation. 5.6.2.1.2.2 State of California Integrated Energy Policy Public Resources Code Section 25301(a) requires the CEC to develop an integrated energy plan at least every two years for electricity, natural gas, and transportation fuels. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. An overarching goal of the resulting Integrated Energy Policy Report is to achieve the statewide greenhouse gas reduction targets, while improving overall energy efficiency. For example, the CEC's 2018 Integrated Energy Policy Report Update includes increasing grid flexibility as a key component and maintaining the reliability of the electricity system while integrating larger amounts of variable wind and solar generation. 5.6.2.1.2.3 Renewables Portfolio Standard (RPS) The state's Renewables Portfolio Standard (RPS) was established in 2002 via Senate Bill (SB) 1078. Since 2011, the RPS target has required all electricity retailers in the state, including investor-owned utilities such as PG&E, Southern California Edison (SCE), and San Diego Gas and Electric (SDG&E) to procure 33 percent of their energy sales from renewable sources by the end of 2020 (CPUC, 2019a). SB 350, passed in 2015, directs California utilities to further increase the amount of renewable energy to be delivered to customers to 50 percent by 2050. Collectively, PG&E, SCE, and SDG&E are forecasted to reach 50 percent in 2020. SB 100, passed in 2018, revised the goal of the program to achieve a 50 percent renewable resources target by 2026, and a 60 percent target by 2030. Additionally, SB 100 created a policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by 2045. 5.6.2.1.2.4 California Advanced Clean Cars Program/Zero Emission Vehicle Program In January 2012, the California Air Resources Board (CARB) approved a new emissions-control program for vehicle model years 2017 through 2025. The program combines the control of smog, soot, and greenhouse gas with requirements for greater numbers of zero-emission vehicles into a single package of standards called Advanced Clean Cars. The components of the Advanced Clean Cars Program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and greenhouse gas emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. In March 2017, CARB voted unanimously to continue with the vehicle greenhouse gas emission standards and the ZEV program for cars and light trucks sold in California past 2025. 5.6.2.1.2.5 CARB Heavy Duty Regulations CARB's On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation requires diesel trucks that operate in California to be

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			upgraded to reduce emissions. By 2023, nearly all trucks will have 2010 model year engines or equivalent.
5.7 Geology, Soils, and Paleontological Resources (GEO)			
GEO-6	Section 5.7.4.1.1.1	**Impact Analysis, Fault Rupture, Seismically Induced Liquefaction and Landslides** This section was revised to describe potentially high liquefaction risks in responseto pre-filing comment GEO-10; however, the revised text describes high liquefaction potential near the Owners River in the southern part of Segment 5, rather than Segment 4. Revise the PEA to correct this discrepancy. The response to pre-filing comment GEO-10 indicated that to ensure that potential risks from liquefaction would not be exacerbated, SCE will consider installing flexible bus connections, incorporating slack in cables, and constructingpile foundations; however, this explanation was not included in the PEA text. Revisethe PEA to incorporate this information and explain when and where flexible bus connections, incorporating slack in cables, and constructing pile foundations would be incorporated into the design, as discussed in comment GEO-5 above. The response to pre-filing comment GEO-10 indicated that "…CEQA does not require an analysis of the environment's impact on a project, but rather a project's potential to exacerbate existing environmental risks should be assessed." And the PEA text was revised to indicated that "…because the CSP Project alignment is located in sparsely populated or uninhabited areas, any liquefaction-induced damage to poles or wires would be unlikely to pose a risk of injury or loss of life. The most serious anticipated adverse effect would be a temporary loss of functionality, pending pole or wire repair or replacement." Liquefaction and/or seismically induced damage to power poles/wires could potentially trigger wildfires. Accounting for potential seismically induced movement/settlement in the design of the CSP project is necessary to prevent the project from exacerbating potential wildfire risks, which would be an impactof the project on the environment.	5.7.4.1.1.1 Construction Less than Significant Impact. The CSP Project would have the potential to be directly impacted by surface rupture in the Alquist-Priolo Special Studies Zones crossed by the CSP Project alignment. Portions of the CSP Project would be constructed within these zones, and as a result could experience strong seismic ground shaking. Even though the CSP Project is located in an area susceptible to earthquake forces, the subtransmission infrastructure involved would not be used for human occupancy and would be designed consistent with GO 95, Rules for Overhead Line Construction, to withstand wind, temperature, and wire tension loads. Accounting for these factors would result in a design that would be adequate to withstand expected seismic loading, and therefore impacts due to strong seismic ground shaking would be less than significant. Liquefaction hazards are considered low to high along the CSP Project alignment. The risk of liquefaction is low in mountainous areas characterized by shallow or surficial bedrock, such as the White Mountains in the central part of Segment 3. The risk of liquefaction is high in valley areas characterized by unconsolidated sediments, shallow groundwater, and high potential ground motions, such as areas near the Owens River in the western part of Segment 3 and the southern part of Segment 4~~5~~. _____ NOTE: The requested information regarding slack, etc. is included in Section 5.7.4.2. The locations where such measures would be implemented would be determined during the final engineering of the CSP Project and following the completion of geotechnical investigations. NOTE: Potential wildfire-related impacts are addressed elsewhere in the PEA document, including in Section 5.9 and Section 5.20. The incorporation of slack, etc. would serve to reduce the potential effects on CSP Project infrastructure, which would in turn serve to reduce the potential effects of failure of CSP Project infrastructure.
GEO-8	Appendix K Paleo Report Errata Sheet	**Paleontological Resource References** Provide references for new citations in the Errata sheet (e.g., Corsetti andHagadorn 2003, California Academy of Sciences 2020, UCMP 2020).	California Academy of Sciences. (2020). Online records search of the California Academy of Sciences Paleontology Database, performed March 4, 2020. Corsetti, F.A. and Hagadorn, J. (2003). The Precambrian-Cambrian Transition in the Southern Great Basin, USA. The Sedimentary Record. A publication of the SEPM Society for Sedimentary Geology. Volume 1, No. 1, May 2003. Nelson, C.A., Hall, C.A., and Ernst, W.G. (1991). Geologic history of the White-Inyo Range: pp. 42–74 in Hall, C. A., ed., Natural history of the White-Inyo Range, eastern California, University of California Press, Berkeley, CA. UCMP. (2020). Online records search of the University of California Museum of Paleontology Database, performed March 4, 2020.
5.8 Greenhouse Gases (GHG)			
5.9 Hazards and Hazardous Materials (HAZ)			
HAZ-2	Section 3.5.13	**Hazardous Materials Management** The response to pre-filing comment HAZ-2 indicated "Herbicides may be usedduring post-construction restoration activities; the use of such materials will bedetermined in conjunction with applicable regulatory agencies. See Section 3.5.13.1." However, Section 3.5.13.1 indicates "No herbicides or pesticides are planned to be used during construction." Post construction restoration activitieswould be part of the construction phase of the project.	NOTE: There is no discrepancy present in the two passages. One states that "Herbicides *may* be used…" and the other passage states that "No herbicides…are *planned* to be used…".(italics added for emphasis) The second passage does not rule out the use of herbicides. NOTE: Section 3.5.13.2 revised as shown here:

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		Revise the PEA to address this discrepancy. If herbicides would be used during construction or operation, revise Section 3.5.13.2 to include best management practices (BMPs) that will be implementedto ensure that there will be no herbicide/pesticide drift into sensitive areas (special-status plants, wetlands, etc.). There are several BMPs listed in Section 3.5.13.2 related to hazardous materials management; however, these BMPs (as well as other BMPs listed/referred to in the CSP PEA document) include only the names of the BMPs, and the BMPs are not described anywhere in the document.Include a table or section in the CSP PEA document where the BMPs are described.	3.5.13.2 Hazardous Materials Management 3.5.13.2.1 BMPs: Transporting, Storing, and Handling The following BMPs would be followed for transporting, storing, and handling hazardous materials: • NS-9, Vehicle and Equipment Fueling. The construction team will implement this BMP when fueling of equipment occurs on site. The equipment should be monitored before and after fueling. This will prevent any fuel from reaching the construction site soils and possible groundwater. Diapers, pans or tarps will be used under fueling areas. Spill kits will be onsite at fueling locations. Fueling areas will be located at least 100 feet from drainages. • WM-1, Material Delivery and Storage. The construction team will implement this BMP to prevent, reduce, or eliminate the discharge of pollutants from material delivery and storage to the stormwater system or watercourses by minimizing the storage of hazardous materials onsite, storing materials in watertight containers and/or a completely enclosed designated area, installing secondary containment, conducting regular inspections, and training employees and subcontractors. • WM-2, Material Use. The construction team will implement this BMP to prevent or reduce the discharge of pollutants to the storm drain system or watercourses from material use by using alternative products, minimizing hazardous material use onsite, and training employees and subcontractors. • WM-4, Spill Prevention and Control. The construction team will implement this BMP to prevent or reduce the discharge of pollutants to drainage systems or watercourses from leaks and spills by reducing the chance for spills, stopping the source of spills, containing and cleaning up spills, properly disposing of spill materials, and training employees. 3.5.13.2.2 BMPs: Incidental Leak or Spill The following BMPs would be followed in the event of an incidental leak or spill of hazardous materials: • WM-4, Spill Prevention and Control. The construction team will implement this BMP to prevent or reduce the discharge of pollutants to drainage systems or watercourses from leaks and spills by reducing the chance for spills, stopping the source of spills, containing and cleaning up spills, properly disposing of spill materials, and training employees. • WM-6, Hazardous Waste Management. The construction team will implement this BMP to prevent or reduce the discharge of pollutants to stormwater from hazardous waste through proper material use, waste disposal, and training of employees and subcontractors. • WM-7, Contaminated Soil Management. The construction team will implement this BMP to prevent or reduce the discharge of pollutants to stormwater from contaminated soil and highly acidic or alkaline soils by conducting pre-construction surveys, inspecting excavations regularly, and remediating contaminated soil promptly.
HAZ-5	Section 5 .9.4	**Impact Analysis** Pre-filing comment HAZ-6 requested a description of how the project facilities would be designed, constructed, operated, and maintained to minimize potential hazard to the public from the failure of project components as a result ofaccidents or natural catastrophes. The PEA was revised to include Section 5.9.4.4 *Accident or Upset Conditions*, which indicates “A description of how the CSP Project components would be designed, constructed, operated, and maintained to minimize potential hazard to the public from the failure of project componentsas a result of accidents or natural catastrophes is presented above in Section 5.9.4.1.2.” However, Section 5.9.4.1.2 only discusses potential upset and accidentconditions that could release hazardous materials into the environment, and does not discuss hazards to the public that could result from the failure of project components as a result of accidents or natural catastrophes (e.g., wildfires that could be ignited if power lines were accidentally damaged or damaged due togeologic/seismic hazards.) Revise the PEA to address this discrepancy. Revise Section 5.9.4.3 to refer to the discussion in Section 5.9.4.1.8, rather than5.9.4.1.9. Revise Section 5.9.4.5 to refer to the discussion in Section 5.9.4.1.11, rather than 5.9.4.1.12.	NOTE: No change made. The content found in Section 5.9.4.1.2 addresses the CEQA criterion [“Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?] What the CPUC is asking for [“…discuss hazards to the public that could result from the failure of project components as a result of accidents or natural catastrophes (e.g., wildfires that could be ignited if power lines were accidentally damaged or damaged due to geologic/seismic hazards.)”] is a wholly different impact analysis that is addressed in Section 5.7.4.1.1 and Section 5.9.4.1.7. . _____

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			5.9.4.3 Air Traffic Hazards Discussions of how the CSP Project would not conflict with height restrictions identified in the airport land use plan and how the CSP Project would comply with any FAA or military requirements for the above ground facilities are presented above in Section 5.9.4.1.~~8~~9. 5.9.4.5 Shock Hazard There is no infrastructure along the CSP Project that may be susceptible to new induced current from the installation of components under the CSP Project. Further, the operating conditions of the new conductor would be identical to the existing operating conditions; therefore, no new induced current would be realized from the CSP Project. The strategies that would be employed to reduce shock hazards and avoid electrocution of workers and the public are presented above in Section 5.9.4.1.11~~12~~12.
HAZ-6	Section 5.9.4.1.1 and 5.9.4.1.2	**Hazards from Routine Transport / Release of Hazardous Materials during Construction** Pre-filing comment HAZ-7 indicated that the PEA failed to state any specific BMPsthat would be implemented related to the management of hazardous materialsand requested that applicable BMPs be listed and discussed. As discussed in Deficiency #HAZ-2 above, there are several BMPs listed in Section 3.5.13.2 related to hazardous materials management; however, these BMPs (as well as other BMPs listed/referred to in the CSP PEA document) include only the names of the BMPs, and the BMPs are not described anywhere in the document. Provide a table or section in the CSP PEA document where the BMPs aredescribed.	See response to HAZ-2.
5.10 Hydrology and Water Quality (HWQ)			
5.11 Land Use (LU)			
5.12 Mineral Resources (MR)			
5.13 Noise (NOI)			
NOI-3	Section 5.13.4.1.1.1	**Noise Standards** The PEA (page 5-215) reads “There are no established noise level standards applicable to Project-related construction activities in Inyo County; therefore, work in Inyo County would not result in the generation of noise levels in excess of established standards.” If construction noise is not “exempt” from general noise standard, then construction noise of a local project would normally be required to comply with the City and County noise ordinance noise limits. This analysis uses the logic that ifconstruction noise limits are not specifically provided then there are no limits on construction noise. That is not the case. If there are no local standards for construction activity noise, the local Noise Ordinance limits for general noise wouldapply to construction noise in unincorporated Inyo and Mono County. These limitsneed to be identified and disclosed as the local noise limits (including construction noise); if in fact these jurisdictions do not have an exemption in the Noise Ordinance (or some other local policy or standard practice) for construction noise. While these local general noise limits may not end up as limits or noise thresholds for construction, they should be included for consideration. This disclosure would be consistent with CPUC General Order No. 131-D that explains that local land useregulations would not apply to the Project; however, the CPUC often considers local policies to inform the determination of significance thresholds for the study area.	The analysis does not use the stated logic. The analysis uses the following logic: 1. There are no local standards for construction noise activity in Inyo County. 2. There are no limits for construction noise in the Inyo County Code of Ordinances. Inyo County itself notes that the “County does not provide noise limits for construction noise.” (DRAFT MITIGATED NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT AND INITIAL STUDY, Zone Reclassification (ZR 2018-09/Saccnllo; GPA 2018-03/Saccullo)) Text modified as follows: *5.13.4.1.1.1 Construction* **No Impact.** Construction of the CSP Project would not result in any permanent increase in ambient noise levels. ~~There are no established noise level standards applicable to Project-related construction activities in Inyo County; therefore, work in Inyo County would not result in the generation of noise levels in excess of established standards.~~ … At two locations in Mono County, construction activities—including existing pole removal—will be performed in proximity to two potentially-inhabitable structures, with construction work occurring approximately 140 and 250 feet distant from these structures. These potentially-inhabitable structures are located on lands designated for agricultural

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			use; the County does not establish noise limits for such land use designations. Work in the vicinity of these potentially-inhabitable structures would generally be performed between the hours of 7:00 a.m. and 7:00 p.m. on weekdays only, and thus would be consistent with Section 10.16.070, Prohibited acts of the Noise Ordinance. In the community of Laws in Inyo County, construction activities—including existing pole removal—will be performed in proximity to potentially-inhabitable structures, with construction work occurring as near as 50 feet from a structure. Inyo County does not provide noise limits for construction noise. Construction activities within 500 feet of existing noise sensitive uses in Inyo County would generally be performed between the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday as consistent with Noise Implementation Measure 5 of the Inyo County General Plan. Therefore, no impact would be realized. Further, measures contained in APM NOI-1 would be implemented when work is performed within 500 feet of residential uses or other sensitive receptors in compliance with Inyo County General Plan Policy NOI-1.7. In the event construction activities are considered necessary outside of these hours, SCE would provide advanced notification of the location where such anticipated activity is expected to be performed. Notification would be provided to the CPUC, the appropriate county, and to residents within 500 feet of the anticipated work. This notification would include a general description of the work to be performed, location, and hours of construction anticipated.
NOI-4	Section 5.13.4.2.1	**Cumulative Noise Impacts** Provide the methods used to calculate cumulative noise impacts in Table 5.13-6in the text. Was the Roadway Construction Noise Model used? Further, provide the data used to calculate cumulative noise impacts so these results can be reviewed and verified.	The Roadway Construction Noise Model was not used. The cumulative noise impact was established using the following shorthand method that provides a sufficient level of accuracy given the lack of quantitative noise standards applicable to the CSP Project. To add two or more noise levels, if the difference between the highest and next highest noise level is: 0–1 dB then add 3 dB to the higher level to give the total noise level 2–3 dB then add 2 dB to the higher level to give the total noise level 4–9 dB then add 1 dB to the higher level to give the total noise level 10 dB and over, then the noise level is unchanged (i.e. the higher level is the total level) Review of Table 5.13-6 indicates the Phase Noise Level (Leq; 50 feet) for the Wood Pole-Equivalent Haul activity and the TSP Haul activity should be 88 dBA, not 85 dBA as shown in the table. Calculating using the following equation yields the following results: $L_{total} = 10\ log_{10}\left(10^{L_1/10} + 10^{L_2/10} + \ldots\ 10^{L_n/10}\right)$ Staging area: 91.7 Road Work: 92.9 **TSP Foundation: 92.0** TSP Haul: 89.6 TSP Assembly: 88.9 **TSP Erection: 87.6** Wood Pole-Equivalent Haul: 89.6 **Wood Pole-Equivalent Assembly: 88.9** Wood Pole-Equivalent Install: 98.2 **Existing Pole Removal: 90.9** Remove Conductor: 93.0 Install Conductor and OHGW: 96.6

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			Install Guard Structures: 92.3 Remove Guard Structures: 92.3 Restoration: 91.2
NOI-5	Table 5.13-6	**Receptor Nearest to Construction** In the column "Receptor Nearest to Construction" there are two instances where the nearest receptor is 10 feet and three instances where the nearest receptor is 50 feet. These receptors are not listed anywhere else in the Noise Section. In Section 5.13.4.1.1.1 it is indicated that "construction work occurring approximately 140 and 250 feet distant from these structures." But there is no mention that construction could occur within 10 or 50 feet. The analysis needs to clarify where these receptors are that are within 10 and 50feet from the use of construction equipment. Those distances (nearest to receptors) are not discussed in Section 5.13.4.1.1.1 nor are those distances listedin Table 5.13-1.	The receptors that are located 10' and 50' from the edge of an identified construction work area are located in Inyo County where no quantified noise standards are present; hence, there is no need to mention them elsewhere in the section. The receptors listed as 140 and 250 feet distant are located in Mono County, which does have quantified noise standards for some land use/zoning designations; and hence these are discussed elsewhere in the section as their proximity to a construction work area is relevant. Note that Table 5.13-1 addresses the distance from the project alignment (the location on the surface directly under the proposed or existing conductor), not the distance from a construction work area. See modified PEA text presented in response to NOI-3.
5.14 Population and Housing (POP)			
5.15 Public Service (PUB)			
5.16 Recreation (REC)			
5.17 Transportation (TRA)			
5.18 Tribal Cultural Resources (TCR)			
TCR-1	Section 5.18.1.2	**Conclusionary Statement** "EI's background research and intensive pedestrian field survey of the APE, there are potential TCRs within the CSP Project area." Explain how this conclusion was reached and describe the kinds of tribal cultural resources that are potentially within the project area.	The presence of prehistoric resources indicates the potential for TCRs to be present within the CSP Project Area. However, TCRs are identified during Tribal Consultation under AB52, which will be conducted by the CPUC.
TCR-2	Section 5.18.1.3	**Ethnographic Background** This section describes the project location, but doesn't even mention the Paiute.The section needs to be revised, with reference to section 5.5.1.4 Ethnographic Background.	Information for the Owens Valley Paiute is included in Section 5.5.1.4. Text added below: The CSP Project area is located within the ethnographic territory of the Owens Valley Paiute, an area that spanned the length of Owens Valley, from Mammoth Lakes and Benton in the north, to Owens Lake in the south, and which extended from the Sierra Nevada in the west, across the White-Inyo Mountains, to Fish Lake Valley in the east. The Owens Valley Paiute are discussed in Detail in Section 5.5.1.4.
5.19 Utilities and Service Systems (USS)			
USS-2	Section 5.19.1.4	**Water Supplies** Pre-filing comments USS-2 and USS-3 requested more detailed information aboutgroundwater pumping in the Laws and Bishop wellfields. The applicant responded that "this will be addressed at a later date following SCE's submittal of its PTC Application for the CSP Project." Although the requested information may be provided elsewhere in project documents, CPUC's PEA Checklist states that the PEA should "provide data on the existing water capacity, supply, and demand." Revise section 5.19.1.4 to include the required information.	5.19.1.4 Water Supplies ~~The CSP Project alignment is located within the Inyo-Mono Integrated Regional Water Management (IRWM) Region. Multiple water districts, large and small, public and private, exist in the IRWM Region and in the vicinity of the CSP Project. The purpose of the IRWM is to identify and implement water management solutions on a regional scale that increase regional self-reliance, reduce conflict, and manage water to concurrently achieve social, environmental, and economic objectives (Inyo-Mono Regional Water Management Group [IMRWMG] 2014). Water demand along the CSP Project alignment is predominately for agricultural purposes, export to Los Angeles, and for environment mitigation; residential and industrial uses are a very small portion of the approximately 710,000 acre-feet used per year (IMRWMG 2014).~~ ~~The LADWP is the primary consumer of groundwater in the area; LADWP's Laws and Bishop wellfields are located proximate to the CSP Project alignment. For the period encompassing the 2013/2014 to 2017/2018 runoff years, groundwater pumping by LADWP from the Laws and Bishop wellfields was more than 7,500 acre-feet less than the planned pumping volumes (Inyo County 2018).~~

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			None of the lands crossed by the CSP Project are served by a central water supply system. The CSP Project alignment overlies the Laws Town Inyo County Water Service Area and the Deep Spring College Water Service Area. ~~with the exception of the area around Laws; State Water Resources Control Board data indicates this area is served by the Laws Town water service provider.~~ In the vicinity of Segment 1, Segment 2, and the western portion of Segment 3, the City of Bishop's water system produces and delivers water for consumption, irrigation, and fire suppression from three wells through almost 22 miles of water mains to about 1,100 service accounts, including some outside of the city limits. The water is groundwater produced through two production wells. A third well is held in standby (City of Bishop 2018). The Sierra Highlands Community Service District provides water to approximately 530 residential customers in the vicinity of Bishop. The water provided is ground water sourced from three wells (SWRCB 2018). A host of smaller mutual water companies and others provide water to smaller populations in the vicinity of Bishop. Outside the immediate vicinity of Laws, residential and other users along Segment 3 are served by private wells. There are no water service providers in Segment 4; residences along Segment 4 are served by private wells. ~~The Deep Springs College serves as its own water service provider, and is the only water service provider in Segment 5.~~ Other water providers in the Bishop area include the Bishop Paiute Tribe, Highland Mobile Home Park, Indian Creek / Westridge Community Services District (CSD), and Meadowcreek Mutual Water Company~~, and Sierra Highlands Community Services District~~. A large section of west Bishop is served by individual wells (IMRWMG 2014). The potential supplier(s) of water to be used during construction of the CSP Project are not known at this time. The supplier(s) would be selected by the construction contractor(s) with that selection based on commercial terms and water availability at the time of construction. The City of Bishop is the largest locally-based water supplier in the CSP Project area in terms of volumes delivered and number of users. The City of Bishop has a water storage capacity of 1 million gallons, can supply in excess of 3,680 gallons per minute, and demand is approximately 1.5 million gallons per annum (equating to a per capita demand of approximately 360 gallons per day). Data regarding the existing water capacity, supply, and demand for the smaller providers is not publicly-available; given the small populations served by these systems, storage capacity is assumed to be small if non-zero, supply is assumed to meet demand, and per capita demand is assumed to be roughly equivalent to that presented for the City of Bishop. LADWP owns and manages the very large majority of water resources in the Owens Valley. For the 2020-21 runoff year, LADWP water supply in the Owens Valley was 322,000 acre-feet; water use, losses, and export (equating to internal demand) was 322,000 acre-feet; and the capacity of the LADWP system (including reservoirs, aqueducts, etc.) is measured in the hundreds of thousands of acre-feet. Bishop sources: City of Bishop. 2021. Annual Water Consumer Confidence Report for 2020. Available at https://www.cityofbishop.com/Document%20Center/Department/Public%20works/Water/ConsumerConfidence2020.pdf City of Bishop. 2008. City of Bishop Water Master Plan. Available at https://www.cityofbishop.com/Document%20Center/Department/Public%20works/Water/WaterMasterPlan2008.pdf LADWP source: Los Angeles Department of Water and Power. 2021. Draft 2021 Annual Owens Valley Report. Available at https://www.inyowater.org/wp-content/uploads/2021/04/Final-DRAFT-2021-OWENS-VALLEY-REPORT-dn.pdf
5.20 Wildfire (WF)			

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5.21 Cumulative Impacts (CI)			