

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
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September 15, 2021

Mr. David Balandran
Licensing/Regulatory Affairs
Southern California Edison
2244 Walnut Grove Ave
Rosemead, CA 91770
Email: David.Balandran@sce.com

Re: Application Completeness – Permit to Construct for the Control-Silver Peak Project – Application No. A.21-08-009

Dear Mr. Balandran:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has completed its first review of Southern California Edison's (SCE) Application (A.21-08-009) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct (PTC) for the Control-Silver Peak Project.

Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses CPUC's *Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments* (November 2019) as the guide for determining the adequacy of project applications.

After review of SCE's application for the Control-Silver Peak Project, the Energy Division finds that the information contained in the PEA is incomplete. While it is thorough in many sections, there are information gaps in critical areas that would prevent preparation of an adequate EIR in a timely manner. The attached report identifies the portions of the application found to be deficient.

Information provided by SCE in response to the Energy Division's finding of deficiency should be filed as supplements to Application A.21-08-009. One set of responses should be sent to the Energy Division and one to our consultant Horizon Water & Environment in electronic format. We request that SCE respond to this report no later than November 15, 2021. Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the

PEA and application as complete. We are available to meet with you at your convenience to discuss these items.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SCE's PTC be approved.

Please direct questions related to this application to me at (415) 703-1956 or eric.chiang@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Eric Chiang".

Eric Chiang
Project Manager
Energy Division, CEQA Unit

Attachment

cc: Lori Charpentier, SCE
Jeff Thomas and Jonathan Hidalgo, Horizon Water and Environment

DEFICIENCY REPORT FOR THE SCE CONTROL-SILVER PEAK PROJECT APPLICATION (A.21-08-009)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in Southern California Edison’s (SCE) Application (A.21-08-009) and Proponent’s Environmental Assessment (PEA) for a Permit to Construct (PTC) the Control-Silver Peak Project. Deficiencies were identified using the CPUC *Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent’s Environmental Assessments* (November 2019) (PEA Checklist). Deficiencies are presented in Table 1.

Table 1. SCE Control-Silver Peak Project Application Deficiencies

ID	PEA Section(s)	Deficiency
Chapter 2: Introduction		
2-1	Sections 2.2.1, 2.2.2 and Appendix G	<p>Records of Consultation and Public Outreach</p> <p>Provide contact information, meeting dates, and meeting notes/records of communication for each entity contacted during pre-filing public outreach. Include any preliminary concerns and how they were addressed and any project alternatives that were suggested.</p>
2-2	Section 2.3.3	<p>National Environmental Policy Act Review</p> <p>Expand the section to address the following PEA Checklist requirements:</p> <ul style="list-style-type: none"> ▪ Identify the NEPA Lead Agency ▪ Identify the specific project components (e.g., segments) that will be reviewed under the NEPA process ▪ Identify all agencies requiring review under NEPA
Chapter 3: Proposed Project Description		
3-1	Section 3.2.1.1	<p>Existing Utility System</p> <p>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, control systems, SCADA systems, etc.</p> <p>Explain the system connectivity, relationship and function with power supply in Nevada.</p> <p>If this information is located in other section of the Project Description, provide a cross-reference.</p>
3-2	Section 3.2.1.2	<p>Existing Users and Service Area</p>

		Identify the existing users served by the existing system features.
3-3	Section 3.2.2.3	Expected Capacities of Proposed Facilities Provide quantified details on replacement conductor and existing substation equipment capacities in amps or megawatts. Identify the capacity change between existing conductor and replacement conductor.
3-4	Section 3.3.4.1.2	Conductor/Cable Confirm that 38.7 miles of OPGW installation should be OHGW.
3-5	Section 3.3.4.4	Different Facilities Would guy wires and anchors be placed within the GIS limits provided for construction work spaces at each pole? If not, provide estimated pole locations where guy wires and anchors may be necessary and identify any associated additional work space. Update impacts descriptions and analysis (including technical appendices) to reflect any revised work spaces. This is of particular concern for biological resource and cultural resource impacts that may not be accounted for.
3-7	Section 3.3.5.2	Aviation Lighting and Marking "SCE does not believe that any component of the CSP Project will require aviation lighting or marking." Provide justification for the quoted statement. Obtaining a preliminary determination by the FAA is preferred, particularly given the proposed project's proximity to an airport. Alternatively, identify all spans that may require aviation lighting or marking so that the effects of such features can be considered in the environmental analysis.
3-8	Section 3.3.5.3	Temporary Work Areas in Steep Slopes A number of proposed pole locations would be on steep slopes. The PEA identifies that such locations would be accessed on foot or via helicopter to avoid the need for civil engineering to address slope stabilization. Provide a GIS layer identifying all temporary work areas that will be accessed on foot or by helicopter only.
3-9	Section 3.3.5.3	Retaining Walls Given the substantial presence of sensitive biological, cultural, tribal, and paleontological resources in the proposed project alignment, a preliminary assessment of locations where retaining walls could be needed is required now, along with preliminary engineering design details (e.g., wall material type and estimated height, finishes, material quantities, footing depths). If SCE is unable to provide this information during this current environmental review, know that the addition of retaining walls after project approval could result in substantial delays in order to complete the necessary CEQA review and supplemental CEQA document.
3-10	Sections 3.4.1	Land Ownership It appears that Figure 3.4-1 is supposed to illustrate land ownership; however, there is an error with the pdf of the figure that is preventing the legend from showing and the figure cannot be printed. Provide a corrected Figure 3.4-1. Provide also associated GIS data for land ownership.
3-11	Section 3.4.2	Existing Right-of-Ways and Easements Existing right-of-way (ROW) and easement requirements need to be clearly described in the PEA.

		<ul style="list-style-type: none"> ▪ 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.
3-12	Section 3.4.3	<p>New or Modified ROWs and Easements</p> <p>Proposed right-of-way (ROW) and easement requirements need to be clearly described in the PEA.</p> <ul style="list-style-type: none"> ▪ 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.
3-13	Section 3.5	<p>Construction Materials</p> <p>Provide a section describing the materials need for construction and estimate quantities (e.g., import fill, aggregate for road base, concrete).</p>
3-14	Section 3.5.1.1.1 Table 3.5-1	<p>Existing Access Roads: Widths</p> <p>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.</p>
3-15	Section 3.5.1.1.2	<p>Existing Access Road Modifications</p> <p>The extent and scope of the existing road rehabilitation needs to be assessed at this time, barring unforeseen conditions that could result from slides, washouts, or other 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).</p> <ul style="list-style-type: none"> • 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. <p>Provide a description of the type of matting proposed as part of road rehabilitation.</p>
3-16	Sections 3.5.1.1.3 and 3.5.1.3.2	<p>ROW for Overland Access</p> <p>The ROW for Overland Access in Table 3.5-1 states that "No restoration would be necessary"; however, 12.7 acres are identified for restoration. Suggest removing the clause "No restoration would be necessary" from Table 3.5-1. Section 3.5.1.3.2 describes that overland access routes will comprise an area of approximately 7.5 miles long by 14 feet wide. This equates to approximately 12.7 acres. Include a sentence in Section 3.5.1.3.2 to describe that up to 12.7 acres of overland access routes may need to be restored and reference Table 3.5-1.</p>
3-17	Section 3.5.1.4.2	<p>Bridge or Culvert Replacement or Installation</p> <p>Locations where new or replacement culverts are necessary as part of access rehabilitation need to be identified in the PEA. Include estimated culvert sizing for each location and preliminary site-specific or standard design details for culvert installation.</p>
3-18	Section 3.5.1.5.2	<p>Helicopter Land Zone Permits</p> <p>Section 3.5.1.5.2 states that "If the construction contractor determines that helicopter-assisted construction is required at a given construction work area,</p>

		and the given construction work area is not located proximate to an identified staging area or CLA, then a helicopter landing zone will be designated either along the alignment or off-alignment. Off-alignment landing zones outside of disturbed areas such as access or spur roads may have impacts on vegetation and other resources. Currently, only 0.46 acres of temporary disturbance is listed for one "Helicopter Landing Zones and Touchdown Areas" in Table 3.5-3. Provide a sentence in Section 3.5.1.5.2 to state that if the need for off-alignment landing zones in undisturbed habitat is identified, a Minor Project Refinement and associated environmental effects analysis would be developed and submitted to the CPUC. Local ministerial permits required would also be obtained.
3-19	Section 3.5.2.2	Staging Area Preparation Describe any secondary containment proposed for hazardous materials storage at staging areas.
3-20	Section 3.5.2.2.1	Staging Area Impacts The site preparation description states "Any land that may be disturbed at the staging areas would be returned to preconstruction conditions or left in its modified condition as agreed to by the landowner, following the completion of construction for the CSP Project." Staging areas not restored would constitute a permanent impact and may induce subsequent development. Table 3.5-3 contains zero acres of permanent disturbance associated with Staging Areas/CLAs. Identify staging areas that may be left in a modified condition and not returned to pre-construction conditions, including an estimated amount of permanent disturbance. Alternatively, remove the statement that some areas may not be restored.
3-21	Section 3.5.3.2 Table 3.5-4	Excavated Material Does the permanent footprint per Pole/ Tower include the footing structure and the spoils, which may be rock, from the excavated holes? Section 3.3.4.5.2 Foundations did not describe that the spoils would be removed from the work areas. Section 3.5.14 Waste Generation and Management does not explicitly describe the handling of excavated material. Provide detail on anticipated spoils and on handling of excavated materials.
3-22	Section 3.5.4.3	Vegetation Clearing Describe how vegetation that is "brushed" will be disposed of.
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.
3-24	Section 3.5.4.5	Work Area Stabilization If benching of temporary work pads is a possibility, potential locations should be identified 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.
3-25	Section 3.5.5.1.3	Excavated Material Section describes that "Excavated material would be used as described in Section 3.5.14, Waste Generation and Management"; however, Section 3.5.14

		does not describe how excavated material will be used. Provide an explanation of how excavated material will be used.
3-26	Section 3.5.10.1.3	<p>Public Access Restrictions</p> <p>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.</p>
3-27	Section 3.5.14.2.1	<p>Liquid Waste Streams</p> <p>This section of the PEA states that drilling mud is not expected to be generated; however, Section 3.5.5.1.3 (Foundation Installation) describes the potential use of drilling mud slurry. This discrepancy needs to be rectified one way or the other.</p>
3-28	Section 3.5.15.1 and Appendix H	<p>Fire Prevention and Emergency Response Plan</p> <p>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:</p> <ul style="list-style-type: none"> ▪ 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 <p>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 confirm that 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.</p>
3-29	Section 3.7.3.2	<p>Habitat Restoration and Invasive Plant Management Plans</p> <p>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 draft plans now in order to ensure that biological resource impacts can be adequately reduced to less than significant levels.</p>
3-30	Section 3.7.3.2.1	<p>Restoring Natural Drainage Patterns</p>

		Identify how pre-project contours will be determined and documented prior to project-related ground disturbance.
3-31	Section 3.11 Table 3.11-1	APM BIO-AVI-5 The thirty-day window for preconstruction burrowing owl surveys contradicts the current CDFW guidelines (CDFG 2012). Appendix D of CDFG 2012 states that take avoidance surveys should be completed no less than 14 days prior to initiating ground disturbance activities. Phasing the burrowing owl surveys ahead of planned ground disturbance can minimize the number of surveys required.
3-32	Section 3.11 Table 3.11-1	APM BIO-BOT-2 APM BIO-BOT-2 states "If restoration is not feasible, SCE shall provide compensation lands consisting of habitat occupied by the impacted [add names of the sensitive tree, cactus, shrub, or yucca species]..." Replace the bracket text with the relevant species.
3-33	Section 3.11 Table 3.11-1	APM BIO-RES-2 The second paragraph of APM BIO-RES-2 states "... (3) identified by [applicable lead federal agency] as special concern." Replace bracketed text with the applicable federal agency.
Chapter 5: Environmental Analysis		
5.1 Aesthetics (AES)		
AES-1	Section 5.1	<p>The PEA section does not establish a basis for impact determinations based on regulatory policies and visual/scenic resource management parameters other than the presentation of simulations. Simulations provided do not show segments within difficult terrain where landscape modifications would be more significant than those that were portrayed.</p> <p>Provide the following additional simulations:</p> <ul style="list-style-type: none"> ▪ Transmission line and access routes along the upper reaches of Silver Canyon Road and Wyman Creek Road ▪ Construction staging areas (immediately or 5 years after construction) identified at the intersection of White Mountain Road (Ancient Bristlecone Scenic Byway) with Silver Canyon and Wyman Canyon Roads ▪ Along the hill and drainages through which SR 168 winds east of Wyman Canyon. See also Deficiency #AES-2. <p>It is recommended that SCE engage the BLM and USFS as well to ensure that there aren't other locations where simulations are required.</p>
AES-2	Section 5.1.1.4 Table 5.1-2	<p>Landscape Units</p> <p>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.</p> <p>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 Metering Station 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.</p>

		<p>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 characteristics of 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.</p>
AES-3	Section 5.1.4.1.3.1	<p>Degrade Visual Character during Construction</p> <p>The impact analysis focuses on equipment presence and construction activities. The analysis does not address the short- to long-term visual impacts of landscape modifications related to the construction staging and laydown areas. The statement that "In general, the visual effects of vegetation removal will be minor and not noticeable to the public and the impact would be less than significant" is related to tree removal or trimming and cannot be supported. Provide additional analysis to support this conclusion.</p> <p>As an example, the areas identified for construction staging at the three corners of the intersection of White Mountain Road (Ancient Bristlecone Scenic Byway), Silver Canyon Road, and White Mountain Road have a cumulative total of 14.7 acres. Figure 5.1-2i, Photo 17 illustrates the character of the area. These lands have a USFS Recreation Opportunity Spectrum designation in the summertime as "roaded natural" where visitor expectations assume that the vegetated landscape would be natural in appearance. These undisturbed lands would be modified with temporary perimeter fencing, grubbing, grading, and spreading of a rock base for the duration of the construction period. The perimeter form of these areas has tentatively been identified as rectilinear and angled enclosures. How will the USFS "High" Scenic Integrity Objective for the area be met? What mitigation is appropriate? No APMs are proposed. Consider developing an additional APM to meet this objective.</p> <p>The visual analysis indicates that restoration and/or revegetation of the construction staging and laydown areas will occur "if" they are within sensitive habitats. Habitat restoration and/or revegetation plan(s) would be developed by SCE with the appropriate resource agencies and implemented after construction is complete (reference BIO-RES-1: Habitat Restoration Management Plan). Visual impacts alone should be sufficient to trigger the need for site restoration and revegetation plans.</p>
AES-4	Section 5.1.4.4.2	<p>Description of Visual Change</p> <p>The description of visual change references only the transmission line poles and circuits. No analysis is made of any access route improvements up to 18 feet wide necessary for construction equipment, especially along Silver Canyon Road and Wyman Creek Road that includes numerous stream crossings and construction of staging and laydown areas.</p> <p>The analysis, as stated, is qualitative, based primarily on the presentation of simulations and is predominantly related to the transmission line poles and circuits. While referencing BLM and USFS visual management goals, the impact assessment does not clearly link the conclusions reached in any depth or method to either the BLM VRM goals or impacts to scenic quality, special areas, viewer sensitivity, and distance zones or the USFS VMS goals or impacts to landscape visibility, existing scenic integrity, or scenic attractiveness.</p> <p>Revise the analysis so that it clearly links to the aforementioned BLM and USFS goals for both transmission line poles and circuits as well as access route improvements.</p>

AES-5	Section 5.1.4.4.2 Table 5.1.6	<p>Summary of Visual Effects at Key Viewpoints</p> <p>In the Visual Change and Effect column, include: any changes from clearing and improvements for the 15- to 25-foot-wide access road (Section 3.5.1.1.1) necessary for construction or operations of the transmission line; changes in vegetation in terms of short- to long-term visual impacts of landscape modifications related to the construction staging and laydown areas recognizing that the length of the visual impacts caused by ground vegetation removal, soil compaction, gravel removal, and species used in revegetation will vary based on elevation.</p> <p>Assume that long-term visual impacts to landscape modifications, particularly in terms of vegetation recovery or habitat restoration plans, are those that would be evident after five years from construction.</p>
AES-6	Sections 5.1.4.4.3 and 5.1.4.4.4 Figure 5.1-4a through Figure 5.1-8b	<p>Simulations</p> <p>Clarify whether there will be long-term construction impacts to the landscape in terms of vegetative removal around the base of the poles and construction access or spur roads leading to them.</p>
AES-7	Section 5.1.4.4.4.1 Figure 5.1-6b	<p>Visual Simulation: Silver Canyon Road at Inyo National Forest (VP 11)</p> <p>The simulation shows poles replacing the existing wood poles that were closest to the roadway edge (south set of the existing paired poles). Traveling east up Silver Canyon Road, the road and topography narrow and the south set of poles is often perched on or near the riparian zone or on a steep hillside. Provide additional simulations to properly depict the construction impacts to the landscape.</p>
AES-8	Figure set 5.4-1	<p>Habitat Designations</p> <p>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 Revegetation Plans (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.</p>
AES-9	Figure set 5.4-2	<p>Rare Plant Designations</p> <p>Rare plant species for identified construction staging areas are not indicated, the disturbance of which may require Habitat Restoration and Revegetation Plans (APM BIO-RES-1) that may (with visual design criteria included) mitigate long-term visual impacts. Update Figure set 5.4-2 to identify these species.</p>
AES-10	Section 5.4.4.1.2.1 Table 5.4-8	<p>Revegetation Timeline</p> <p>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.</p>
5.2 Agriculture and Forestry Resources (AFR)		
AFR-1	Section 5.2.4.1.4.2	<p>Forestland Impacts</p> <p>This section states that the two-pole lines in Segment 3 "located on forestland" are to be replaced with single-pole lines which will allow some ground to "become forest land over time" and reduce the amount of future clearing and pruning required.</p>

		<p>Provide the following to support the "no impact" conclusion:</p> <ul style="list-style-type: none"> • How many acres would be abandoned? How do they count against the 112 acres of impacted forest? • What if non-tree vegetation (shrub/grass/invasives) occupies these abandoned areas making reforestation less likely or more difficult? • Provide a site-specific restoration plan for these areas? What is the desired future condition? See also Deficiency #PD 3-24. • Will roads/trails and other associated soil disturbances and cut pole bases in the abandoned alignments be treated or re-contoured for visual and erosion control reasons?
5.3 Air Quality (AQ)		
AQ-1	Section 5.3 and Section 5.8	<p>Air Quality Modeling</p> <p>A review was conducted of the CalEEMod output (construction equipment, employee vehicles, and haul truck emissions) and helicopter emissions with comparison to Table 3.6-1: Construction Equipment and Workplace Estimates. The equipment type, equipment horsepower, number of pieces of equipment, load factor, hours per day of operation, and number of days of usage (start/end dates) were consistent between CalEEMod (Appendix B) and Table 3.6-1 for each of the construction activity tasks. The estimated construction workforce, number of worker trips, number of vender trips, and number of hauling trips compares correctly with the information within CalEEMod and Table 3.6-1. Helicopter emission calculations use the proper information from the Swiss Federal Office of Civil Aviation Guidance on Determination of Helicopter Emissions (December 2015). The inclusion of fugitive dust emissions associated with helicopters is acknowledged.</p> <p>The annual construction emissions by year shown in Table 5.3-2: Estimated Controlled Construction Emissions and Table 5.3-3: Estimated Controlled Construction Emissions are consistent with the total emissions from CalEEMod and the helicopter operations. The estimated GHG emissions within Section 5.8 are properly representative of the information within CalEEMod and the helicopter operations.</p> <p>Provide an electronic copy of the CalEEMod input file.</p>
AQ-2	Section 5.3.4.1.2.1 Table 5.3-2 and Table 5.3-3	<p>Construction Emissions Tables</p> <p>The measurement units for the Significance Thresholds are tons per year only. Remove the label for pounds per day as this is not necessary and provides confusion.</p>
5.4 Biological Resources (BIO)		
BIO-1	Section 5.4.1.2	<p>Temporary and Permanent Project Impacts</p> <p>The CPUC PEA Checklist states that "All temporary and permanent project areas must 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. 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 be subject 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</p>

		Checklist. Provide a revised survey that includes all potential temporary and permanent project impact areas.
BIO-2	Section 5.4.1.3 Table 5.4-2	California State Rarity Rankings Outdated The California State Rarity Ranking is based on outdated information. A new list of Sensitive Natural Communities was released by the California Department of Fish and Wildlife on August 18, 2021. For example, Small-leaf Mountain Mahogany Scrub; <i>Cercocarpus intricatus</i> Association is ranked S2 in the table, but it is ranked S3 in the 2021 ranking. Revise the table based on most recent list of Sensitive Natural Communities.
BIO-3	Section 5.4.1.3.1 page 5-46	California State Natural Communities List Outdated Paragraph 1, sentence 2 references the updated California State Natural Communities List (CDFW 2018a). A new list of Sensitive Natural Communities was released by the California Department of Fish and Wildlife on August 18, 2021. Revise the reference and associated rankings where they differ.
BIO-4	Sections 5.4.1.5.2.4 and 5.4.1.7.2	Greater sage grouse Greater sage grouse is not adequately discussed. It is listed in Table 5.4-7 Special-status Wildlife species not observed within the CSP Project alignment. CDFW has provided hundreds of locational data of greater sage grouse adjacent to the project and records of leks within 2 miles of the alignment. Figure 5.4-7 shows known brood locations on both north and south of the alignment citing a USFWS publication from 2013. Brood locations have been located both north and south of the CSP Project Alignment and the CDFW data base includes several observations of juvenile Greater sage grouse within 500 meters of the project alignment including one less than 50 meters from the project alignment; therefore, this species may nest within the alignment. Provide a more robust discussion of greater sage grouse.
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: <ul style="list-style-type: none"> • 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 CNDDDB 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 CNDDDB 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.

BIO-6	Table 5.4-7	<p>Special-status Wildlife Species Not Observed within the CSP Project Alignment</p> <p>Update Table 5.4-7 to acknowledge the following observations:</p> <p>Greater sage grouse – CDFW has provided hundreds of locational data of greater sage grouse adjacent to the project and records of leks within 2 miles of the project alignment. Figure 5.4-7 shows known brood locations on both north and south of the project alignment citing a USFWS publication from 2013.</p> <p>Brood locations have been located both north and south of the CSP Project Alignment and the CDFW data base includes several observations of juvenile Greater sage grouse within 500 meters of the alignment including one less than 50 meters from the project alignment. It is therefore impossible to rule out nesting of this species within the project alignment.</p>
BIO-7	Section 5.4.1.5.2.5	<p>Desert Bighorn Sheep</p> <p>The discussion of desert bighorn sheep occurrence in the CSP Project alignment vicinity is incomplete. 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.</p> <p>While APM BIO-MAM-1 appears to adequately mitigate for potential impacts to desert bighorn sheep, the description of their potential for occurrence here is incomplete.</p>
BIO-8	Section 5.4.1.8	<p>Permanent and Temporary Loss of Habitat</p> <p>Description states there are no known approved local, regional, or state habitat conservation plans covering the CSP Project alignment; however, the CSP Project alignment occurs within the boundary of the California Desert Conservation Area Plan described in section 5.4.2.1.1.4.</p>
BIO-9	Section 5.4.4.1.1.1 Section 5.4.4.1.2.1	<p>APM References</p> <p>APM BIO-BOT-02 is referred to as "Special-status Tree/Shrubs/Cactus" whereas in Table 3.11-1 it is titled "Special-status Perennial Plants and Other Species." Update APM references as appropriate.</p>
BIO-10	Section 5.4.4.1.1.1	<p>Vehicle Travel Measures</p> <p>The final paragraph under the Amphibians setting states "To avoid potential impacts to other special-status amphibian species, SCE would implement APM BIO GEN-1: Pre-Construction Biological Clearance Survey and Monitoring and APM WEAP: Worker's Environmental Awareness Training. These APMs contain measures, including pre-construction surveys, construction monitoring, flagging, and spill prevention and vehicle travel measures to protect special-status sensitive amphibians." These APMs do not appear to include vehicle travel measures. Describe applicable vehicle travel measures or remove the reference to them.</p>
BIO-11	Section 5.4.4.1.1.1	<p>Swainson's Hawk Nest</p> <p>The third paragraph on page 5-94 states "CSP Project construction work activities may potentially impact special-status birds, their nests, and foraging habitats, but no nests of listed avian species were observed during the surveys." Earlier in the section, it is stated that the California Threatened species Swainson's hawk was observed nesting within 85 feet of the CSP Project alignment. Revise this sentence to clarify that a Swainson's hawk nest was observed during surveys, or that no nests of listed species were observed in Project work areas.</p>
BIO-12	Section	<p>Greater sage grouse</p>

	5.4.4.1.1.1	<p>There is not an adequate analysis of potential impacts to nesting greater sage grouse from project construction. Particularly from helicopters, but also from ground crews and ground disturbance. There are known leks and nests within 2 miles, and potentially closer, to the CSP Project alignment.</p> <p>APM BIO-GEN-1 (Preconstruction surveys) and APM BIO-AVI-1 (Nesting Bird Management Plan) are not adequate to mitigate for potential impacts from helicopter noise to nesting greater sage grouse.</p> <p>Provide additional details on potential impacts to nesting greater sage grouse from project construction.</p>
BIO-13	Section 5.4.4.1.1.1	<p>Roosting Habitat</p> <p>Analysis states that no roosting habitat would be directly impacted. This statement is not consistent with descriptions in Appendix C.1 or APMs BIO-GEN-1 and BIO-MAM-2. Revise to describe potential impacts to roosts and implementation of these APMs. Paragraph also states that "Minimal suitable bat foraging habitat is located along the CSP Project alignment", which is not consistent with descriptions in Appendix C.1. For example, Appendix C.1 states "There is a moderate to high potential for the Townsend's big-eared bat species to forage within the project alignment, although observations have been infrequent." Revise the paragraph to align with descriptions in Appendix C.1.</p>
BIO-14	Section 5.4.4.1.1.1	<p>Amphibians, Reptiles, and Mammals Impacts</p> <p>Sections 3.3.4.5.2 Foundations, 3.3.14.3 Below-Ground Telecommunication Lines, and 3.5.5.3 Telecommunications describe the temporary creation of excavated holes and trenches that pose an entrapment hazard to amphibians, reptiles, and some mammals. Revise the PEA so that this potential impact is addressed in Section 5.4.4.1.1.1. It is also recommended that an APM be added to Table 3.11-1 that includes measures such as escape ramps, cover boards, and monitoring/surveys to avoid and minimize the risk of entrapment and injury or death of wildlife.</p>
BIO-15	Section 5.4.4.1.1.1	<p>Bighorn Sheep Impacts</p> <p>Revise the description of potential impacts to bighorn sheep to include potential impacts to lambing, which is addressed in APM BIO-MAM-1.</p>
BIO-16	Section 5.4.4.1.2.1	<p>Vegetation Mapping</p> <p>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 additional sensitive 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.</p>
BIO-17	Section 5.4.4.1.4.1	<p>Aquatic Species Impact</p> <p>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 is not consistent with the overall analysis and APMs, which address accidental sedimentation of aquatic habitat.</p> <p>Revise impact analysis accordingly.</p>
BIO-18	Section 5.4.4.1.6.1	<p>California Desert Conservation Area Plan</p>

	and 5.4.4.1.6.2	Description states that there are no known approved local, regional, or state habitat conservation plans covering the CSP Project alignment, but portions of the alignment fall within the California Desert Conservation Area Plan described in section 5.4.2.1.1.4. Update the PEA to address consistency with the California Desert Conservation Area Plan.
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 wood pole-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 5.4.4.1.7.2 and application of APM BIO-AVI-6.
BIO-20	Appendix C.1. Habitat Assessment Technical Report Section 4.2.5	Vegetation Types Dominated by Plants with Wetland Indicator Status The Fourwing Saltbush (<i>Atriplex canescens</i>) alliance is described as having a wetland indicator status for this alliance type as "FACU", but the Arid West indicator list does not provide a status for the dominant species. Revise the text so that the indicator status matches the Arid West indicator list status of "None".
BIO-21	Appendix C.1. Habitat Assessment Technical Report Section 4.2.21	Interior Rose Thickets The Interior Rose Thickets alliance is described as having a wetland indicator status for this alliance type as "FAC", but the Arid West indicator list includes "FACU" for the dominant species. Revise the indicator status to match the Arid West indicator list status.
BIO-22	Appendix C.2. Preliminary Jurisdictional Delineation Technical Reports Appendix E	Figure Standards Figures are not consistent with the <i>Updated Map and Drawing Standards for the South Pacific Division Regulatory Program (February 10, 2016)</i> : 5. Delineations of waters of the United States j. Each line or polygon representing a water of the U.S. must be labeled with a unique name (For example, WL1, WL2, VP1, VP2, STR1, STR2, etc.). Multi-geometry features, such as streams split by a culvert crossing, shall be separated into individual sections, each with their own unique names (For Example, STR1a, STR1b, etc.). Some features in Appendix E (USACE Jurisdictional Waters Mapping) and Appendix F (CDFW Jurisdictional Waters Mapping) do not label split figures with their own unique names (e.g., US0063 on Figure 46 of 56, Appendix E USACE Jurisdictional Waters Mapping; CA0063 on Figure 46 of 56, Appendix F CDFW Jurisdictional Waters Mapping). 8. Ground photograph Maps b. Each photo-point must be labeled with a unique name and the compass direction in which the photograph was taken (e.g., a dot with an arrow or labels such as P1-NW and P1-315°). Photopoints are not labeled on Appendix E (USACE Jurisdictional Waters Mapping) or Appendix F (CDFW Jurisdictional Waters Mapping) figures. To find the photopoint, must locate the

		<p>unique identifier of the feature that the photopoint is taken of (e.g., US0001) in the photopoint caption (Appendix G) and then search for that feature on the Appendix F figures.</p> <p>c. A table must be provided either on the map or as a separate attachment, which lists each uniquely named photograph, its geographic coordinates (latitude, longitude), the compass direction in which the photograph was taken (e.g., N, NW, 45°, 270°, etc.), and a brief explanation of the photograph's relevance.</p> <p>A separate table is not provided. In the photo caption under each photo in Appendix G (Photographic Log), each photo is provided with a unique identifier with general compass directions (e.g., facing south), however, geographic coordinates are not listed.</p> <p>Update the figures to be consistent with the <i>Minimum Standards for Acceptance of Aquatic Resources Delineation Reports (January 2016)</i>.</p> <p>For the maps depicting aquatic resources, a reference block that identifies the site or project name, individual(s) who conducted the delineation, date of the map, and date(s) of any revisions is missing.</p> <p>Field data forms are included in Appendix D (Field Data Forms); however, data points are not depicted on the figures.</p>
5.5 Cultural Resources (CULT)		
CUL-1	Section 5.5	<p>Paleontology Setting</p> <p>Remove the third paragraph in this section. Paleontology is no longer listed under Cultural Resources in the CEQA checklist, nor is it further discussed in this chapter.</p>
CUL-2	Section 5.5.1.5	<p>Historic Background</p> <p>This historic background appears to be taken only from the archaeological report when it should be a blending of information from both the archaeological and 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, there is 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.</p> <p>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 resources is included and that this information and the manner in which it is organized is consistent across both reports.</p>
CUL-3	Section 5.5.1.7	<p>Cultural Resources Summary</p> <p>Throughout this section, resources are discussed as historic sites, prehistoric sites, and multicomponent sites, but there is no expanded discussion that identifies the different 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</p>

		<p>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 segment and site type.</p> <p>Define lithic scatter, multicomponent, and any other terms that may not be common to the reader.</p>
CUL-4	Section 5.5.1.7.1.1.1	<p>Records Search</p> <p>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 or briefly explain those portions that were covered.</p> <p>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 heritage search as an appendix to the PEA.</p>
CUL-5	Section 5.5.1.7.1.2.2	<p>APE Boundary</p> <p>This section should focus only on the current APE and not include data that refers to 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 refer only to the current APE. Table 5.5-1 needs to be similarly revised; there is no need to 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 these changes.</p>
CUL-6	Section 5.5.1.7.1.2.2	<p>Eligibility Recommendations</p> <p>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 the total number of archaeological sites within the current project APE. Revisions based on Deficiency #CUL-5 should resolve that problem.</p> <p>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.</p>
CUL-7	Section 5.5.1.7.2	<p>Built Environment Types</p> <p>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 built environment resource, a separate table listing resources type by segment also needs to be included.</p>
CUL-8	Sections 5.5.1.7.2 and 5.5.1.7.2.1.1	<p>Records Search</p> <p>Presumably, the record search results from the Eastern Information Center (as described in Section 5.5.1.7.1.2.1 Records Search results) were included in this effort. The use of record search data needs to be specified in this section.</p>
CUL-9	Section 5.5.1.7.2 Table 5.5-2	<p>Built Environment Resources</p> <p>Replace "improvement" with "resource" throughout this section to avoid confusion; resource should be applied to both elements of the built environment and archaeological resources.</p>

CUL-10	Section 5.5.1.7.2.2 Table 5.5-2	<p>Resource Evaluation</p> <p>Only resources that were of sufficient age are to be recorded and evaluated should 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.</p> <p>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 included in the tally for built environment resources, although it is not stated. Reference to resources 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.</p> <p>Similar to the archaeological resources, provide a discussion about how the evaluation recommendations were determined.</p>
CUL-11	Section 5.5.2.1.1	<p>Federal Regulations/Policies</p> <p>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 applicable agency-specific regulations. In addition, include a discussion of the Archaeological Resources Protection Act.</p>
CUL-12	Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	<p>Archaeological Survey Report</p> <p>Several of the comments for the Cultural Resources chapter of the PEA are directly relevant to the Archaeological Survey Report:</p> <ul style="list-style-type: none"> • 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
CUL-13	Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	<p>Section 4.3 Research Themes/Section 4.3.1 Prehistoric Research Themes/ Pages 38-39</p> <p>This section notes that prehistoric archaeological sites are most often evaluated under 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 should be 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 be added, but others need to be acknowledged in addition to saying that those presented “are not exhaustive.”</p>
CUL-14	Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	<p>4.3.2 Historic Research Themes / Page 38</p> <p>Like comment CUL-12, provide similar discussion for historic era archaeological sites.</p>
CUL-15	Appendix D. Cultural	<p>Resource Evaluation</p>

	Resources Studies. Class III Archaeological Survey Report.	Site FS# 05045302546 (CSP-Site-310) contains a sparse scatter of historic refuse. A standing cabin is also present. Research indicates the cabin was built sometime prior to 1951. The archaeological report specifically states that the cabin was not evaluated 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.
CUL-16	Appendix D Historic Era Built Environment Survey Report	<p>Period of significance - Global throughout Sections 4 and 5</p> <p>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 related to 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 significance outlined (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 match the period discussed.) Furthermore, periods of significance (such as the example above) are overly long for most of the themes identified; a period of significance should break down historic context data into meaningful eras to aid understanding rather than attempting to cover an extended period of change over time.</p> <p>Revise the period of significance for each of the themes outlined such that they:</p> <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> ○ 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 Environment Survey Report	<p>Document structure Report sections 4 and 5</p> <p>The purpose of a historical overview of the geographic area is not distinct from theme-based historic context. Separation into two sections creates confusion and makes the information difficult for the reader to process.</p> <p>Revise the historic context section to incorporate local historic contexts currently located in Section 4. They fit most naturally into the theme of homesteading and settlement.</p>
CUL-18	Appendix D Historic Era Built Environment Survey Report	<p>Explanation of source document development Global throughout document</p> <p>Remove explanation of development of Caltrans context, OHP guidance, NRHP guidance, and other sources throughout report; the historiography of these documents is primarily of interest to cultural resource management professionals or 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.</p>
CUL-19	Appendix D Historic Era	Use of "improvement" Global throughout document

	Built Environment Survey Report	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.
CUL-20	Appendix D Historic Era Built Environment 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). Revise this language to "cultural resources" to conform to typical cultural resource management practice and avoid confusion.
CUL-21	Appendix D Historic Era Built Environment Survey Report	Significance criteria, character-defining features, and integrity thresholds Global throughout Sections 4 and 5 Each theme developed in the historic context requires the addition of significance criteria, character-defining features, and integrity thresholds. As with resource types, these are essential elements of a historic context, are critical to the purpose of historic context/theme development, and can be borrowed from existing historic context statements. Revise themes accordingly.
CUL-22	Appendix D Historic Era Built Environment 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 to each theme must be included.
CUL-23	Appendix D Historic Era Built Environment 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 during the 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.
CUL-24	Appendix D Historic Era Built Environment 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.
CUL-25	Appendix D Historic Era Built Environment Survey Report	<p>Historic context: Theme 1: Water Conveyance, 1870s-1930s (27-29)</p> <p>Justify/break up periods of significance as discussed above.</p> <p>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 practice agriculture. The Caltrans water conveyance context provides a more detailed and 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.</p> <p>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.</p> <p>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.</p>
CUL-26	Appendix D Historic Era Built Environment Survey Report	<p>Historic context: Theme 2: Electric Power Conveyance, 1900-1964 (28-30)</p> <p>The historic context provided is too brief and lacks adequate detail as a framework for evaluation of electrical power-related resources, revise as described below.</p> <p>Limit property types to elements of the built environment. Although fuel supply systems may be potentially eligible property types, as written the draft suggests that fuel such as oil or coal is itself a property type, this is incorrect.</p> <p>The importance of the development of electric power to human history and a brief discussion of its most famous 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.</p> <p>The historic narrative begins in 1900, 14 years after establishment of SCE's parent companies; 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 the DPR 523 forms, this information must be included in the historic context themes.)</p> <p>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 framework for evaluation under criterion B/2.</p> <p>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 document organization and allow the reader to better understand a complex story that takes place over more than half a century.</p>

		<p>Include a very brief outline of the development of Southern California cities, such as Los Angeles, to provide an understanding of the population growth and urban development that both drove the development of electrical power resources and was in turn stimulated by its availability.</p> <p>The Nevada Power Mining and Mining Company (NPMMC) appears to have developed the early infrastructure; provide detailed historical background on the NPMMC as a framework for evaluation of these resources.</p> <p>The section is disorganized and essentially consists of a chronological list of events. Thematic headings and shorter periods of significance will help organize the data. Specific development events in Owens Valley should follow the more general contextual history and biographical sections.</p> <p>The events listed need explanation/analysis that allows the reader to understand their importance.</p> <p>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 the text to fill in the data gaps as identified above.</p>
CUL-27	Appendix D Historic Era Built Environment Survey Report	<p>Historic context: Theme 3: Mining, 1850s-1960 (33-35)</p> <p>Remove discussion of source documents from introduction (as discussed above) and replace with a synthesis of themes and property types discussed in these documents.</p> <p>Utilize geographical, thematic, and temporal headings in order to organize data into 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.</p>
CUL-28	Appendix D Historic Era Built Environment Survey Report	<p>Historic context: Theme 4: Exploration, Transportation and Travel Pathways, 1860s to 1961 (36-46)</p> <p>Remove discussion of source documents from introduction (as discussed above) and replace with a synthesis of themes and property types discussed in these documents.</p> <p>Utilize geographical, thematic, and temporal headings in order to organize data into a comprehensible and usable form.</p> <p>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 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.</p> <p>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 1910 simply does not make sense in a discussion of wagon roads. Avoid use of</p>

		temporal descriptors like “eventually;” they should be replaced with specific dates or at least decades.
CUL-29	Appendix D Historic Era Built Environment Survey Report	<p>Historic context: Property/ resource types Global throughout section 5</p> <p>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.</p>
CUL-30	Appendix D Historic Era Built Environment Survey Report	<p>Historic context: Theme 6: Homesteading and Settlement, 1862-1950s (50-52)</p> <p>Introduce the section with a paragraph about the native American settlements in the region. This history can be brief but should include the names of the local tribes, 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.</p> <p>Explain the distinction between agriculture and ranching.</p> <p>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.</p> <p>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 introduction with the local histories from section 4 should be incorporated afterwards.</p>
CUL-31	Appendix D Historic Era Built Environment Survey Report	<p>Historic context: Theme 7: Recreation, 1910s-1950s (53-58)</p> <p>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 associated with any extant historic age properties. Such sections are not relevant to the purpose of a historic context (evaluation of resources) and should be removed.</p> <p>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, adding contributing factors such as improvements in roads, ubiquity of personal automobiles, rising incomes, and/or other historical factors contributed to the increase in tourism.</p>

		<p>Remove discussion of Devil's Postpile, rainbow falls, and any other locations which are outside the project area and marginally relevant (page 54).</p> <p>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).</p>
CUL-32	Appendix D DPR 523 Forms	<p>DPR 523 Forms – Basic Methodology</p> <p>Department of Parks and Recreation (DPR) 523 forms consist of recordations and conclusory 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 where the resource is located as it relates to the history of the resource.</p> <p>An adequate evaluation must describe:</p> <ul style="list-style-type: none"> ▪ 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 – <ul style="list-style-type: none"> ○ Location – the place where the resource was constructed or where the historic event occurred ○ Design – the combination of elements that create the form, plan, space, and style of the resource ○ Setting – physical environment of a resource ○ 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 ○ Workmanship – the physical evidence of the crafts or a particular culture or people during any given period in history or prehistory ○ Feeling – a resource's expression of the aesthetic or historic sense of a particular period of time ○ Association – the direct link between an important historic event or person and the resource
CUL-33	Appendix D DPR 523 Forms	<p>DPR 523 Forms – Language</p> <p>Use "is recommended" eligible/ineligible rather than "appears."</p>
CUL-34	Appendix D DPR 523 Forms	<p>DPR 523 Forms – Organization</p> <p>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 has not been utilized correctly. This part of the submission must be much more</p>

		<p>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 should also 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 its build date, eligibility status, etc. would be a good starting point.</p> <p>The “Control Plant Four-Control Plant Three 115 KVA Sub- Transmission Line” DPR is an 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</p> <p>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.</p> <p>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 DPRs attached to the report.</p>
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5.6 Energy (EN)

		<p>Environmental Setting</p> <p>The PEA does not provide enough detail regarding the energy setting. Revise the section to include the following:</p> <ul style="list-style-type: none"> ▪ 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.
EN-1	Section 5.6.1	
EN-2	Section 5.6.2.1.1	<p>Federal Energy Regulatory Commission Regulations</p>

¹ These comments are based on a brief review of the DPR submission rather than a comprehensive and detailed evaluation of its sufficiency, which may reveal additional details that need to be addressed.

		Provide language on applicable Federal Energy Regulatory Commission (FERC) regulations. Federal vehicle standards would be applicable given cars and trucks would be used for construction and O&M.
EN-3	Section 5.6.2.1.2	<p>GHG policies</p> <p>Provide applicable GHG policies or provide a reference to GHG section for applicable policies. The reader should be directed to relevant information if it is in another chapter/section.</p> <p>Revise to include applicable CPUC energy programs.</p>
5.7 Geology, Soils, and Paleontological Resources (GEO)		
GEO-1	Table 5.7-2	<p>Geologic Units Along the Proposed Project Alignment</p> <p>In response to pre-filing comment GEO-1, the geologic unit numbers column in this table was removed; however, this edit has resulted in table rows that are identical and redundant. Remove duplicate or redundant rows.</p>
GEO-2	Section 5.7.1.2.4.1	<p>Liquefaction, Owens and Chalfant Valleys</p> <p>This section has been revised to indicate that the Owens and Chalfant valleys underlie portions of Segments 1, 2, 3, and 5, rather than 1, 2, 3, and 4. Revise the PEA to correct this.</p>
GEO-3	Section 5.7.1.2.6	<p>Soil Erosion</p> <p>This section indicates that susceptibility of soils to erosion by water along the CSP Project alignment are summarized in Table 5.7-3, and this section refers to water erosions hazard ratings; however, water erosions hazard ratings are not included in Table 5.7-3. The response to pre-filing comment GEO-5 indicated that the hydrologic group classification shown in Table 5.7-3 is a measure of infiltration rate and runoff potential and that this is used as a proxy for susceptibility to erosion by water; however, this is not explained in the PEA text. Add water erosions hazard information to Table 5.7-3 or revise the text of the PEA to explain how the water erosion hazards for the CSP Project alignment were determined based on the soil classification information presented in Table 5.7-3.</p>
GEO-4	Section 5.7.2.1.1.1	<p>National Earthquake Hazards Reduction Act of 1977</p> <p>The numbering of program objectives list was changed and is now off (4 replaced by 5). Revise the PEA to correct this.</p>
GEO-5	Section 5.7.4.1.1.1	<p>Impact Analysis, Fault Rupture, Seismically Induced Liquefaction and Landslides</p> <p>This section indicates that the project "...would be designed consistent with CPUC 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."</p> <p>Pre-filing comment GEO-9 indicated that it is not clear how designing for wind, temperature, and wire tension loads would also account for seismic loads and potential for displacement between poles due to fault creep or fault rupture, and that the PEA should provide more detail on how seismic hazards are accounted for in the project design to ensure the project would not be damaged by seismic hazards.</p> <p>The response to pre-filing comment GEO-9 indicated that seismic hazards are accounted for in the project design through the consideration of installing flexible bus connections, incorporating slack in cables, and constructing pile foundations; however, this explanation was not included in the PEA text. Revise the PEA to</p>

		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. Construction of pile foundations could have implications for the analysis of other resource topics (e.g., paleontology, air quality, greenhouse gas emissions).
GEO-6	Section 5.7.4.1.1.1	<p>Impact Analysis, Fault Rupture, Seismically Induced Liquefaction and Landslides</p> <p>This section was revised to describe potentially high liquefaction risks in response to 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.</p> <p>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 constructing pile foundations; however, this explanation was not included in the PEA text. Revise the 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.</p> <p>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 indicate 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."</p> <p>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 impact of the project on the environment.</p>
GEO-7	Section 5.7.4.1.3.1	<p>Impact Analysis, Unstable Soil, Liquefaction and Landslides</p> <p>This section starts off by indicating that the CSP Project would not cause any geologic unit or soil to become unstable; however, it goes on to describe how the project includes activities that could result in landslides or rockfalls. Revise the PEA to address this discrepancy.</p>
GEO-8	Appendix K Paleo Report Errata Sheet	<p>Paleontological Resource References</p> <p>Provide references for new citations in the Errata sheet (e.g., Corsetti and Hagadorn 2003, California Academy of Sciences 2020, UCMP 2020).</p>
GEO-9	Appendix K Paleo Report Errata Sheet	<p>Paleontological Resource Records Search Results</p> <p>Presumably the University of California Museum of Paleontology (2020) and California Academy of Sciences (2020) citations are records search results. The records search Appendix in the current Report appears to have been redacted and is not readable. This should be corrected, and the new records search results added. Note that in order to protect sensitive resources these would typically not include locational information, so there is no reason to redact.</p>
5.8 Greenhouse Gases (GHG)		
		See Air Quality above.

5.9 Hazards and Hazardous Materials (HAZ)		
HAZ-1	Section 5.7.4.1.3.1	<p>Impact Analysis, Unstable Soil, Liquefaction and Landslides</p> <p>The response to pre-filing comment HAZ-1 indicated that blasting has been omitted from the revised CSP PEA document; however, blasting is still included as a construction activity that could trigger rockfalls in Section 5.7.4.1.3.1. Revise the PEA to address this discrepancy.</p>
HAZ-2	Section 3.5.13	<p>Hazardous Materials Management</p> <p>The response to pre-filing comment HAZ-2 indicated "Herbicides may be used during post-construction restoration activities; the use of such materials will be determined 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 activities would be part of the construction phase of the project. Revise the PEA to address this discrepancy.</p> <p>If herbicides would be used during construction or operation, revise Section 3.5.13.2 to include best management practices (BMPs) that will be implemented to 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.</p>
HAZ-3	Sections 5.9.1, 5.9.1.1, and 5.9.4.1.2.1	<p>Environmental Setting, Hazardous Materials Report, and Release of Hazardous Materials into the Environment</p> <p>Pre-filing comment HAZ-2 indicated that the <i>Environmental Setting</i> (now Section 5.9.1) identified that past land uses along the proposed project alignment included mining, mineral prospecting and processing, and agriculture; and light industrial uses are found in the western portion of Segment 3 near Laws. Railroad tracks and a historic railroad depot are also present near proposed pole locations in the town of Laws (though the section does not describe this historic railroad use). These types of land uses may have resulted in contamination of soil or groundwater with hazardous materials. Additionally, soil and groundwater surrounding the base of existing utility poles could be contaminated with hazardous materials from wood preservatives (e.g., arsenic, pentachlorophenol, and polycyclic aromatic hydrocarbons [PAHs]) that may have been applied to/leached out of the existing poles. Per the CPUC's PEA Checklist, a Phase I Environmental Site Assessment (ESA) or similar hazards report is required for the proposed project area, and should be included as an appendix to the PEA.</p> <p>The response to pre-filing comment HAZ-2 indicated the following: "Printouts of results from public database queries are included in Appendix F, Environmental Data Resources Report...As discussed during the January 30, 2020 meeting between SCE, the CPUC, and its consultant, SCE has not included an ESA with the PEA."</p> <p>Section 5.9.1.1 describes the review of State and federal databases for hazardous materials and waste sites, and indicates that the reviewed records indicate hazardous materials are not present within or immediately adjacent to the CSP Project alignment. However, based on the past land uses along the proposed project alignment described in Section 5.9.1, there is the potential for previously unidentified hazardous materials impacts to be present in soil and groundwater in areas of the CSP Project alignment (e.g., areas that were</p>

		<p>previously used for mining, mineral prospecting and processing, agriculture, railroad tracks, and a historic railroad depot) and for impacts from wood preservatives (e.g., arsenic, pentachlorophenol, and PAHs) to be present in soil at the base of existing poles. The review of State and federal databases for hazardous materials and waste sites presented in the PEA does not address the potential for previously unidentified hazardous materials impacts to be present due to these past land uses. A Phase I ESA or similar report would need to be prepared to identify areas of the CSP Project alignment where contamination could potentially be encountered based on past land uses, and describe the types of contaminants that could be encountered. For example, there is an area in the eastern portion of Segment 3 (northeast of Segment 5) where the project alignment intersects an area with several mine shafts and mine tailings piles, which could be impacted with elevated concentration of heavy metals, and there is the existing power pole located adjacent to a mine tailings pile in this area.</p> <p>Some contaminants are not identifiable through visual inspection (e.g., heavy metals and pesticides); therefore, the Soil Management Plan (SMP) described in APM HAZ-2 and referred to in Section 5.9.4.1.2.1 should require protocols for testing/screening of soil in areas where potential contamination may be present that can't be identified visually to ensure that construction workers would not be exposed to hazardous materials and to ensure that contaminated soil, if present, is appropriately managed so that hazardous materials would not be released into the environment.</p>
HAZ-4	Section 5.9.1.1 Table 5.9-1	<p>Hazardous Materials and Waste Sites</p> <p>Pre-filing comment HAZ-3 requested that SCE provide any records, personal communications, maps, and any other information obtained regarding the facilities listed in Table 5.9-1. The response to previous comment HAZ-3 indicated that printouts of results from public database queries are included in Appendix F, Environmental Data Resources Report.</p> <p>The printouts in Appendix F include only basic and minimal information regarding these sites (e.g., screen shots of the GeoTracker and EnviroStor summary pages and lists of available documents). Appendix F does not include copies of any figures or documents that would provide the information necessary to determine whether the facilities listed in Table 5.9-1 have released hazardous materials within or immediately adjacent to the CSP Project alignment. Appendix F of the PEA should be revised to include copies of the figures/documents that were reviewed which provide the basis for stating that hazardous materials associate with these facilities are not present within or immediately adjacent to the CSP Project alignment. Alternatively, this information could be presented in a Phase I ESA or similar report that should be prepared as discussed in pre-filing comment HAZ-3 above.</p>
HAZ-5	Section 5.9.4	<p>Impact Analysis</p> <p>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 of accidents or natural catastrophes. The PEA was revised to include Section 5.9.4.4 <i>Accident or Upset Conditions</i>, 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 components as 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 accident conditions that could release hazardous materials into the environment, and does not discuss hazards to the public that could result from the failure of project</p>

		<p>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.) Revise the PEA to address this discrepancy.</p> <p>Revise Section 5.9.4.3 to refer to the discussion in Section 5.9.4.1.8, rather than 5.9.4.1.9.</p> <p>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.</p>
HAZ-6	Section 5.9.4.1.1 and 5.9.4.1.2	<p>Hazards from Routine Transport / Release of Hazardous Materials during Construction</p> <p>Pre-filing comment HAZ-7 indicated that the PEA failed to state any specific BMPs that would be implemented related to the management of hazardous materials and 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 are described.</p>
HAZ-7	Section 5.9.4.1.2 and APM HAZ-2	<p>Applicant Proposed Measures, HAZ-2: Prepare a Soil Management Plan</p> <p>Section 5.9.4.1.2 indicates "A low potential exists for contaminated soil to be encountered during excavation or other ground disturbing activities, and thus the risk of hazards to the public, workers, and the environment from the release of such materials would be less than significant." As discussed in Deficiency # HAZ-3 above, the PEA does not address the potential for previously unidentified hazardous materials impacts to be present along the CSP Project alignment. A Phase I ESA or similar report is needed to identify areas of the CSP Project alignment where contamination could potentially be encountered based on past land uses, and describe the types of contaminants that could be encountered.</p> <p>Pre-filing comment HAZ-14 indicated that some contaminants (e.g., heavy metals and pesticides) cannot be identified by visual observation; therefore, it is recommended that APM HAZ-2 require that soil sampling and analysis be performed prior to disturbance of soil in areas of potential contamination identified in a Phase I ESA, and the SMP should include soil management requirements based on the soil testing results.</p> <p>The response to pre-filing comment HAZ-14 indicates that the SMP will be addressed at a later time. Revise the PEA to describe how the potential for previously unidentified hazardous materials impacts to be present along the CSP Project alignment would be addressed (for example, through further investigation that would be performed as part of APM HAZ-2).</p>
HAZ-8	Section 5.9.4.1.7	<p>Potential Expose of People or Structures to a Significant Risk of Loss, Injury or Death Involving Wildland Fires</p> <p>The PEA includes a variety of general statements but does not include any quantitative analysis of wildfire probability, spread or intensity to justify the claim that the exposure of people or structures is less than significant. Because the data is available, a quantitative spatial analysis is an industry standard for analyzing this question and is expected here.</p> <p>Vegetation would be trimmed; however, there is no mention of whether the cut material would be left to dry and remain on-site, or somehow be disposed of off-site. There is no analysis of the expected area (location and size) to be treated in this manner. The distribution of fuel models (both a table form, interpreted in text</p>

		<p>and shown on a map) are necessary risk factors that should be analyzed. There is no mention of topography in the project area, especially in relation to wildfire behavior and potential damage, which is another crucial factor that is unaddressed.</p> <p>While the PEA notes a variety of steps SCE would take as part of the project to minimize risk, fires can start even with them in place. Analysis is needed to determine the frequency and impact of wildfire even when these measures are in place.</p> <p>Similarly, the PEA states, "The Plan describes strategies, programs and activities that are in place, being implemented or are under development by SCE to proactively address and mitigate the threat of electrical infrastructure-associated ignitions that could lead to wildfires. Therefore, no impacts would be realized under this criterion during O&M". Having a plan in place is not a justification for a less than significant impact. Instead, an analysis of the risk of loss, injury or death should be conducted using the abundant spatial data available.</p>
5.10 Hydrology and Water Quality (HWQ)		
HWQ-1	Section 5.10.1.3	<p>Groundwater Resources</p> <p>The description of each basin in the PEA is limited to an overview of the basin that lacks sufficient details. Provide a discussion of total groundwater basin area and storage, depth, etc. for each groundwater basin.</p>
HWQ-2	Section 5.10.4.1.5.1	<p>Crossing Restoration</p> <p>Provide additional details related to how stream channels that would be returned to pre-project topography and grade. Identify any APMs that may address this issue.</p>
HWQ-3	Section 5.10.4.1.6.1	<p>Alter Drainage Patterns in a Manner That Would Impede or Redirect Flows During Construction</p> <p>Provide specific details related to the storage of equipment within the 100-year floodplain, including location and specific measures to reduce impacts from placement of equipment within the floodplain.</p>
5.11 Land Use (LU)		
LU-1	Section 5.11.1.2	<p>Special Land Uses</p> <p>Provide milepost information so that the reader can easily pinpoint the areas where the Proposed Project could affect special land uses.</p>
LU-2	Section 5.11.1.2.5	<p>Table 5.11-1. Land Use and Zoning Designations</p> <p>Pre-filing comment LUP-5 requested that information related to Inyo County Airport Land Use Commission be included in Table 5.11-1 or discussed in a separate section. The applicant responded that this information is addressed in Sections 5.9 and 5.13.</p> <p>Although the requested information is relevant to the discussion of hazards, hazardous materials, and public safety (Section 5.9) and noise (Section 5.13), the Inyo County ALUC has land use and planning jurisdiction within the area of the airport facilities. Provide cross-references to the requested information in Sections 5.9 and 5.13, which is relevant to the analysis of "conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." The reader needs to be directed to applicable information if it is located in another section/chapter.</p>

LU-3	Section 5.11.2.1.1.2,	<p>BLM Bishop Resource Management Plan</p> <p>Pre-filing comment LUP-7 requested clarification about land use decisions relevant to the Owens Valley and Benton Management Areas. Although the requested information may be provided elsewhere in project documents such as the Plan of Development, the PEA should contain information that is relevant to the analysis of "conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect."</p>
5.12 Mineral Resources (MR)		
		No comments at this time.
5.13 Noise (NOI)		
NOI-1	Section 5.3.1.1	<p>Sensitive Receptors</p> <p>There are some duplicates for the definition of sensitive receptors from the Mono County General Plan (Residential areas, Hospitals, Convalescent homes and facilities, schools, and libraries). Delete duplicates from the list or explain why there are duplicates in this list.</p>
NOI-2	Section 5.13.1.2	<p>Noise Study</p> <p>The CPUC PEA Checklist states that projects should "5.13.1.2: Noise Setting. Provide the existing noise levels (Lmax, Lmin, Leq, and Ldn sound level and other applicable noise parameters) at noise sensitive areas near the proposed project. All noise measurement data and the methodology for collecting the data will be provided in a noise study as an Appendix to the PEA."</p> <p>However, the Noise Setting in the PEA does not include any noise study or any existing noise measurement data at noise sensitive areas near the proposed project. The Noise Setting in the PEA references old noise measurements from 2014 and measurements that are not near the proposed project. Short-term noise measurements that happen to be from the same jurisdiction as the proposed project are not an appropriate substitute for existing noise measurements near the proposed project and are not appropriate baseline noise data for noise sensitive areas near the proposed project.</p> <p>The PEA needs to conduct a noise study that documents existing noise levels (Lmax, Lmin, Leq, and Ldn sound level and other applicable noise parameters) at noise sensitive areas near the proposed project. Measurements should be made at the most representative location in the various jurisdiction that are the setting for the proposed project.</p>
NOI-3	Section 5.13.4.1.1.1	<p>Noise Standards</p> <p>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."</p> <p>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 if construction 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 would apply to construction noise in unincorporated Inyo and Mono County. These limits need to be identified and disclosed as the local noise limits (including construction</p>

		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 use regulations would not apply to the Project; however, the CPUC often considers local policies to inform the determination of significance thresholds for the study area.
NOI-4	Section 5.13.4.2.1	Cumulative Noise Impacts Provide the methods used to calculate cumulative noise impacts in Table 5.13-6 in 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.
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 50 feet 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 listed in Table 5.13-1.
5.14 Population and Housing (POP)		
POP-1	Section 5.14.4.3	Work Force Provide justification as to personnel that may work on the CSP Project and who currently reside within the impact area is unknown and unknowable. Section 5.17.4.1.2.1 states "As presented in Chapter 3 – Project Description, SCE anticipates that construction of the CSP Project would take approximately 33 months, and that up to 100 workers could be working along the CSP Project alignment on any given day. SCE anticipates that its own crews or specialty electrical contractors would be used for this work. The short duration of the construction period would not trigger the creation of any new employment positions—SCE crews and contractor crews are currently employed and utilized on projects across the broader region." Revise the PEA to resolve these two seemingly conflicting statements.
5.15 Public Service (PUB)		
PUB-1	Section 5.15.1.1.2	Emergency Response Times Pre-filing comment PUB-1 requested the documented performance objectives and data on existing emergency response times for service providers in the area (e.g., police and fire department response times); however, this comment was not addressed. Provide the requested information or provide a reasoning for why this data is not available.
5.16 Recreation (REC)		
		No comments at this time.

5.17 Transportation (TRA)		
TRA-1	Section 5.17.4.1.2	<p>Vehicle Miles Traveled</p> <p>The PEA does not provide enough details regarding VMT from the proposed project. Revise section 5.17.4.1.2 to include the following CPUC PEA Checklist requirements:</p> <ul style="list-style-type: none"> ▪ Identify whether the project (or any portion therein) is within 0.5 mile of a major transit stop or a high-quality transit corridor. ▪ Identify the number of vehicle daily trips that would be generated by the project during construction and operation by light duty (e.g., worker vehicles) and heavy-duty vehicles (e.g., trucks). ▪ Provide the frequency of trip generation during operation. ▪ Quantify VMT generation for both project construction and operation. ▪ Provide an excel file with the VMT assumptions and model calculations, including all formulas and values. ▪ Evaluate the project VMT relative to the average VMT for the area in which the project is located.
5.18 Tribal Cultural Resources (TCR)		
TCR-1	Section 5.18.1.2	<p>Conclusionary Statement</p> <p>"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.</p>
TCR-2	Section 5.18.1.3	<p>Ethnographic Background</p> <p>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.</p>
5.19 Utilities and Service Systems (USS)		
USS-1	Section 5.19.1.3	<p>Approved Utility Projects</p> <p>The text states that "SCE is not aware of any utility projects that have been approved for construction within the project ROW but that have not yet been constructed." However, the applicant's response to pre-filing comments USS-9 and USS-11 states that "Utility projects that have been approved for construction within the project ROW are included in Section 7.1, Cumulative Impacts."</p> <p>Provide a list of utility projects that have been approved for construction within the project ROW.</p>
USS-2	Section 5.19.1.4	<p>Water Supplies</p> <p>Pre-filing comments USS-2 and USS-3 requested more detailed information about groundwater 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."</p> <p>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.</p>
USS-3	Section 5.19.2.1.3.3	<p>Mono County General Plan</p>

		<p>Pre-filing comment USS-10 requested that goals and policies relevant to the CSP Project from the Mono County General Plan be included. The applicant responded that “The PEA text has been modified accordingly.”</p> <p>No goals or policies from the Mono County General Plan were added to the text of the PEA. Provide this information.</p>
USS-4	Section 5.19.4.1.1.1	<p>Construction Impacts That Would Result in the Relocation or Construction of New Facilities (third paragraph)</p> <p>Pre-filing comment USS-15 requested information about proposed construction activities and phasing to avoid power shutdown during construction. The applicant responded that “No existing infrastructure needs to be relocated beyond that described in the Project Description....”</p> <p>Revise the text to acknowledge and describe relocation of existing electrical infrastructure or cross-reference the discussion in the Project Description.</p>
USS-5	Section 5.19.4.2-5.19.4.5	<p>Impact Analysis Section Numbering and Headings</p> <p>Section 5.19.4.1, Impact Analysis, contains the analysis of impacts based on CEQA Guidelines significance criteria and CPUC additional criteria. The CPUC PEA Checklist identifies information to be included in the analysis of each impact; this information is mistakenly numbered to follow the impact analysis, rather than being included within it. For example, Section 5.19.4.2, Utility Relocation, contains information that should be included in Section 5.19.4.1.1 related to impacts of utility relocation. Restructure these sections (now numbered 5.19.4.2-5.19.4.5) accordingly.</p>
5.20 Wildfire (WF)		
WF-1	Section 5.20.2.1	<p>Wildfire Regulatory Setting</p> <p>The regulatory setting is lacking several pertinent regulations. Revise the wildfire regulatory setting to include the following as appropriate:</p> <ul style="list-style-type: none"> ▪ California Code of Regulations (CCR) and Public Resources Code (PRC) <ul style="list-style-type: none"> ○ CCR Title 14 Section 1272 [PRC 4290 and 4291] Defensible Space and Fire Safe Development ○ CCR Title 14 Section 1254 [PRC 4292] Powerline Hazard Reduction] ○ CCR Title 14 Section 1254 [PRC 4293] Powerline Clearance Required ○ CCR Title 14 Section 1254 PRC 4294-4296.5, Powerline Clearance Exceptions ○ CCR Title 14, Section 4427 ○ CCR Title 14, Section 4428-4429 ○ CCR Title 14, Section 4431 ○ CCR Title 14, Section 4442 and 4443 ○ CCR Title 14, Forest Practice Rules Article 8, Rule #918 Fire Protection ▪ California Multi-Hazard Mitigation Plan ▪ California Department of Forestry and Fire Protection (CAL FIRE) Strategic Fire Plans, or Unit Plans ▪ Local Hazard Mitigation Plans ▪ Local Community Wildfire Protection Plans
WF-2	Section 5.20.1.2	<p>Fire Occurrence</p>

		Identify all fires in the last 10 years in the project vicinity, not just those that overlap the Project alignment.
WF-3	Section 5.20.1.3	<p>Fire Risk</p> <p>This section states, that because the work will be done in the same alignment as existing lines, the "rebuilding with modern infrastructure installed to current CPUC Rules will not negatively alter the baseline fire risk in the area"; however, there is no analysis to justify this conclusion.</p> <p>Are there any other weather stations along the Project alignment? Weather from a RAWS station, which is compatible with fire behavior modeling is the industry standard in a wildfire analysis and is missing here.</p> <p>Provide a table of acreage for the Scott and Burgan fuel models and describe the models in the text.</p>
WF-4	Section 5.20.1.3 Table 5.20-3	<p>USDA Fire Effects Information System Vegetation Types</p> <p>There is no justification for using fire regimes as a measure of fire risk; these two are not highly correlated. An assessment of fire risk should be conducted. Table 5.20-3 should also include the acreage of each of these vegetation types in the project vicinity, not just the project area itself.</p> <p>Provide an assessment that measures the potential for damage from wildfire and combine the probability of the occurrence with the likely magnitude of damage. A fire behavior and occurrence analysis should be conducted that combines the impacts of those wildfires on values at risk.</p>
WF-5	Section 5.20.1.4	<p>Values at Risk</p> <p>This section states, "There is no rare habitat along the CSP Project alignment that is at risk from wildfire." However, maps displayed in Section 5.4 Biological Resources indicate areas of sensitive and protected plants; all are at risk of a wildfire, since they are biomass. These are values at risk from wildfire and should be included in this analysis. The habitat overlaid with hazard/threat layer, or layered with the result of a customized analysis of fire threat is required here.</p> <p>The analysis should include a table of the number of structures within a reasonable distance of the project area, categorized by fire hazard severity zones. Alternatively, the values at risk could be described using the CAL FIRE Vulnerability or threat Index.</p>
WF-6	Section 5.20.1.5	<p>Evacuation Routes</p> <p>The PEA notes that U.S. 395 and U.S. 6 are identified as primary evacuation routes, but it does not indicate by whom; this omission should be corrected. Additionally, provide information on any adopted evacuation plans or emergency response plans.</p>
WF-7	Section 5.20.4.1.1	<p>Construction Effects on an Adopted Emergency Response Plan or Emergency Evacuation Plan</p> <p>It cannot be known whether a fire would cause evacuation impacts without a fire behavior analysis, which is missing from the PEA. Further, the PEA did not mention an emergency response plan, so we cannot know whether the project will impact it (See Deficiency #WF-6 above). Similarly, if there is an adopted evacuation plan, it is not included in this analysis. Describe both of these plans and compare to the results of a project-specific wildfire behavior analysis.</p>
WF-8	Section 5.20.4.1.3	<p>Potential for Project Construction to Exacerbate Wildfire Risks</p> <p>The PEA states, "No components of the CSP Project are designed for human occupancy, therefore no impacts would occur", however, the project area is</p>

		<p>near and, in some cases, adjacent to occupants. This question was mis-interpreted, since wildfires can easily spread outside the work area into inhabited areas.</p> <p>Provide a fire behavior analysis in order to answer the question of where a fire a would spread. The output of the analysis will need to be typical fire spread or spread ROS, into adjacent Wildland-Urban Interface areas.</p>
WF-9	Section 5.20.4.1.3	<p>Potential for Installation or Maintenance of Infrastructure That May Exacerbate Fire Risk</p> <p>Analysis of the impacts of the project itself is missing and needs to be provided. The removal of vegetation and the likely replacement by alien ignitable plant species is a possibility that should be evaluated. The trimming of vegetation to allow for overland travel or to create temporary staging areas are both places where alien, flammable grasses are likely to replace existing vegetation. The trimming of vegetation on road crown, in areas of overland travel, and other locations constitute the creation of fuel breaks. The running of diesel generators constitutes an additional ignition source, as does the equipment used to cut the vegetation. Vehicles traveling over vegetation (which may have been cut and left, and then dried) adds another fire risk that can be attributed to construction. The data is available to perform a quantitative analysis and should be included here.</p> <p>Because the specifics of the Construction Fire Prevention Plan are not known, the impacts of wildfire cannot be determined since the safety measures would presumably reduce the occurrence and spread and damage from wildfires. But without knowing the actions to be taken, we cannot know to what extent the reductions in the occurrence, spread and damage may be. See also Deficiency #3-28 above.</p>
WF-10	Section 5.20.4.2	<p>Fire Behavior Modeling</p> <p>This question is mis-interpreted. No fire behavior modeling was conducted because the PEA assumes it was meant to focus on only structures and built facilities. However, this question is part of the wildfire section, and wildfire behavior modeling is required as discussed above.</p>
WF-11	Figure 5.20-2	<p>Wildland Urban Interface</p> <p>These maps are not interpreted in the text. Does this relate to potential impacts? The designations on the maps are not used in the analysis, or useful in analyzing significance. An analysis should use wildfire threats (rate of fire spread, flame lengths, fireline intensity, or combination thereof) overlaid with the population density data. Provide additional descriptions in the text and total acres of project areas in each category.</p>
5.21 Cumulative Impacts (CI)		
		No comments at this time.