May 23, 2025

VIA EMAIL

Tommy Alexander
California Environmental Quality Act Project Manager
California Public Utilities Commission Energy Division
505 Van Ness Avenue
San Francisco, California 94201

RE: Response to the California Public Utilities Commission's (CPUC's) Data Request 3 for the LS Power Grid California, LLC (LSPGC) Manning 500/230 kV Substation Project (Application 24-06-017)

Dear Mr. Alexander,

Only May 17, 2025, the CPUC Energy Division requested additional information to supplement and inform the environmental review of LSPGC's Manning 500/230 kV Substation Project. This response the CPUC's Data Request #3 includes the following attachments:

- Response to Comments Table (including Table 1, Vegetation Communities and Land Cover Impacts and Table 2, Potentially Jurisdictional Linear Water Features)
    - Attachment A: Vegetation Communities, Wetlands, Drainages, and Land Cover Types Mapping

Should you have any questions or need any additional information, please do not hesitate to contact me at (925) 808-0291.

Sincerely,

Dustin Joseph

Dustin Joseph
Director of Environmental Permitting

Enclosures

cc: Clayton Eversen (LSPGC)
James Schuchard (LSPGC)
Margaret Bratcher (LSPGC)
Douglas Mulvey (LSPGC)
David Wilson (LSPGC)
Michelle Wilson (CPUC)
Heather Blair (Ascent Environmental)
Kari Zajac (Ascent Environmental)

California Public Utilities Commission Data Request #3
Manning 500/230 Kilovolt Substation Project

Issued May 17, 2025 – Response Requested by May 23, 2025

Item	Request	Response
1	Please provide updates to Table 2-8 in the "TBD" row for unsurveyed areas (page 2-33 of the Proposed IS/MND). Please also provide updated landcover mapping if available.	Updates are provided in **Table 1:** Vegetation Communities and Land Cover Impacts and updated land cover mapping is depicted in **Attachment A**: Vegetation Communities, Wetlands, Drainages, and Land Cover Types.
2	Please provide information on the 15 additional potentially jurisdictional water features were identified in previously unsurveyed areas and the date(s) the survey was conducted.	Surveys were conducted from March 24 through 27, 2025. Insignia biologists identified 15 new water features within the survey area that are potentially under the jurisdiction of the United States (U.S.) Army Corps of Engineers (USACE), Regional Water Quality Control Boars (RWQCB), and/or California Department of Fish and Wildlife (CDFW); and the biologists recorded additional detail for one feature identified in the Biological Resources Technical Report (BRTR) as this feature extended into previously unsurveyed areas. Combined with the six water features assessed in the BRTR, a total of 21 water features are located within the Proposed Project survey area. **Table 2:** Potentially Jurisdictional Linear Water Features provides detailed information on each potentially jurisdictional water feature within the survey area and whether it meets the criteria to be classified as a water of the U.S. or a water of the state. Nineteen of the potentially jurisdictional water features are ephemeral streams located in the western region of the Proposed Project survey area alongside PG&E's existing Los Banos-Midway #2 500 kV and Los Banos-Gates #1 500 kV Transmission Lines, as well as within the survey area associated with the PG&E Transposition Towers. The remaining two potentially jurisdictional water features are agricultural ditches located along West Manning Avenue. These water features did not contain observable water flow and were identified using distinct ordinary high water mark (OHWM) indicators. Although several National Wetland Inventory (NWI) features were present, several were not identifiable in the field and deemed not present.
3	Provide supporting rationale for why Tulare grasshopper mouse (*Onychomys torridus tularensis*) does not have potential to occur in the project area.	Tulare grasshopper mouse is now considered to have a low potential to occur within the Proposed Project area. Although approximately 7.3 acres of saltbush scrub habitat is present, it was determined to be only marginally suitable due to its high degree of fragmentation and its location within a landscape dominated by agricultural fields that undergo frequent tilling and pesticide application.
4	Provide information on the presence of suitable habitat for loggerhead shrike in previously unsurveyed areas.	As mentioned previously in the response to Item 3 (above), highly fragmented patches of saltbush scrub habitat are present within the survey area. These patches could provide suitable nesting habitat for the

Item	Request	Response
		species. While suitable nesting habitat is present, no California Natural Diversity Database (CNDDB) occurrences for this species have been recorded within 5 miles.

Table 1: Vegetation Communities and Land Cover Impacts

Vegetation Community of Land Cover Type	Temporary LSPGC Project Component Impacts (acres)	Permanent LSPGC Project Component Impacts (acres)	Temporary PG&E Project Component Impacts (acres)	Permanent PG&E Project Component Impacts (acres)	Temporary Shared PG&E and LSPGC Project Component Impacts (acres)	Permanent Shared PG&E and LSPGC Project Component Impacts (acres)	Temporary Total Impacts (acres)	Permanent Total Impacts (acres)
Active Agriculture	177.95	0.56	70.42	1.19	59.32	0.00	307.69	1.75
Annual Grassland[1]	8.58	0.18	53.91	0.29	0.03	0.00	62.51	0.47
Saltbush Scrub	<0.01	0.00	1.06	0.03	0.00	0.00	1.06	0.03
Developed	1.27	0.01	2.42	0.04	0.00	0.00	3.69	0.05
Disturbed	9.42	3.26	30.43	0.57	24.76	13.05	64.61	16.87
Total	**197.22**	**4.01**	**158.22**	**2.13**	**84.12**	**13.05**	**439.56**	**19.18**

Note: [1] *Amsinkia* (*menziesii, tessellate*), *Phacelia* spp. Herbaceous Alliance, *Avena spp. - Bromus spp.* Herbaceous Semi-Natural Alliance, *Brassica nigra - Centaurea* (*solstitialis, melitensis*) Herbaceous Semi-Natural Alliance, and *Bromus rubens - Schismus* (*arabicus, barbatus*) Herbaceous Semi-Natural Alliance.

Table 2: Potentially Jurisdictional Linear Water Features

NWI ID	Drainage ID	Feature Type	Wetland Indications Present	Approximate Length (feet)	Average Measurement (feet)				Jurisdictional Area (acres)			Notes
					OHWM Width	OHWM Depth	Top of Bank (TOB) Width	TOB Depth	USACE	RWQCB	CDFW	
W-8	D-1, eastern section on Manning Alignment	Riverine (NWI), Ephemeral Stream (Field assessment)	N	820	10	3	10	13.33	0.19	0.19	0.03	This feature crosses the Proposed Project survey area in two locations. The eastern section crosses I-5 from the southwest, then the feature is no longer defined at its intersection with W-11 on the downstream side. The eastern section of this feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters upstream and downstream. No wetland indicators or riparian vegetation were observed. No water was present within this feature at the time of observation. The feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 1 and 2 of Attachment F: Linear Water Feature Photographs.
W-11	D-1, eastern section on Manning Alignment	Riverine (NWI), Agricultural Ditch (Field assessment)	N	2,400	10	3	10	13.33	0.55	0.55	0.74	Although this feature intersects the Proposed Project survey area at multiple locations, this feature is one of only two drainages observable within the Proposed Project survey area. An OHWM, defined bed and bank, and connecting waters upstream were observed. The drainage associated with this feature is closely associated with W-8 on the upstream side before switching alignments to W-11 and transitioning to an agricultural ditch downstream of the I-5 overpass. The eastern section of this feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters upstream and downstream. No wetland indicators or riparian vegetation were observed. No water was present within this feature at the time of observation. The feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 1 and 2 of Attachment F: Linear Water Feature Photographs.
-	D-10	Ephemeral Stream (Field assessment)	N	845	1.0	0.1	1.0	0.1	-	0.02	0.02	The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters upstream and downstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 3 and 4 of Attachment F: Linear Water Feature Photographs.
-	D-11	Ephemeral Stream (Field assessment)	N	406	1.1	0.1	1	0.1	-	0.01	0.02	This feature is a tributary of D-10. The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state I and is identified in Photographs 5 and 6 of Attachment F: Linear Water Feature Photographs.
-	D-12	Ephemeral Stream (Field assessment)	N	325	1.0	0.1	1.0	0.1	-	0.01	0.01	The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 7 and 8 of Attachment F: Linear Water Feature Photographs.
-	D-13	Ephemeral Stream (Field assessment)	N	336	12.0	0.1	8.0	0.3	-	0.1	0.10	The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature

NWI ID	Drainage ID	Feature Type	Wetland Indications Present	Approximate Length (feet)	Average Measurement (feet)				Jurisdictional Area (acres)			Notes
					OHWM Width	OHWM Depth	Top of Bank (TOB) Width	TOB Depth	USACE	RWQCB	CDFW	
												was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 9 and 10 of Attachment F: Linear Water Feature Photographs.
-	D-14	Ephemeral Stream (Field assessment)	N	418	7.0	0.7	6.5	3.2	-	0.04	0.12	The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters upstream and downstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 11 and 12 of Attachment F: Linear Water Feature Photographs.
-	D-15	Ephemeral Stream (Field assessment)	N	592	28	1.5	27	2.1	-	0.19	0.21	This feature is a tributary of D-17. The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 13 and 14 of Attachment F: Linear Water Feature Photographs.
-	D-16	Ephemeral Stream (Field assessment)	N	120	1.0	0.3	1.0	1.5	-	0.01	0.01	This feature is a tributary of D-17. The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 15 and 16 of Attachment F: Linear Water Feature Photographs.
-	D-17	Ephemeral Stream (Field assessment)	N	481	1.5	0.3	1.5	3.4	-	0.02	0.07	The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 17 and 18 of Attachment F: Linear Water Feature Photographs.
-	D-18	Ephemeral Stream (Field assessment)	N	309	3.5	0.75	2.5	2.5	-	0.02	0.06	This feature is a tributary of D-17. The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 19 and 20 of Attachment F: Linear Water Feature Photographs.
-	D-19	Ephemeral Stream (Field assessment)	N	71	7.3	0.9	7.0	1.5	-	0.01	0.02	This feature is a tributary of D-18. The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 21 and 22 of Attachment F: Linear Water Feature Photographs.
-	D-20	Ephemeral Stream (Field assessment)	N	212	17.2	2.1	17	2.2	-	0.09	0.10	This feature is a tributary of D-18. The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water

NWI ID	Drainage ID	Feature Type	Wetland Indications Present	Approximate Length (feet)	Average Measurement (feet)				Jurisdictional Area (acres)			Notes
					OHWM Width	OHWM Depth	Top of Bank (TOB) Width	TOB Depth	USACE	RWQCB	CDFW	
												of the state and is identified in Photographs 23 and 24 of Attachment F: Linear Water Feature Photographs.
-	D-21	Ephemeral Stream (Field assessment)	N	263	1.7	4.0	1.7	2.4	-	0.02	0.02	The feature has a well-defined bed and bank and observable OHWM indicators. The feature had observable connectivity to waters downstream, but not upstream. No wetland indicators or riparian vegetation were observed. No water was present within the feature at the time of the survey. This feature was determined to meet the criteria to be classified as a water of the U.S. or a water of the state and is identified in Photographs 25 and 26 of Attachment F: Linear Water Feature Photographs.

ATTACHMENT A: VEGETATION COMMUNITIES, WETLANDS, DRAINAGES, AND LAND COVER TYPES

Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 1 of 15

Manning 500/230 Kilovolt Substation Project

D-7
D-6 (W-6)
D-5
D-3 (W-5)
D-4
D-2
D-8
S Brannon Ave
W Manning Av

- Mapped Drainage
- Survey Area

Vegetation and Landcover

- Agriculture
- *Amsinckia (menziesii, tessellata) - Phacelia* spp. Herbaceous Alliance
- *Avena* spp. - *Bromus* spp. Semi-Natural Alliance
- *Bromus rubens - Schismus (arabicus, barbatus)* Herbaceous Semi-Natural Alliance
- Developed
- Disturbed
- Not Surveyed

Source: Insignia, 2025, USFWS, 2024

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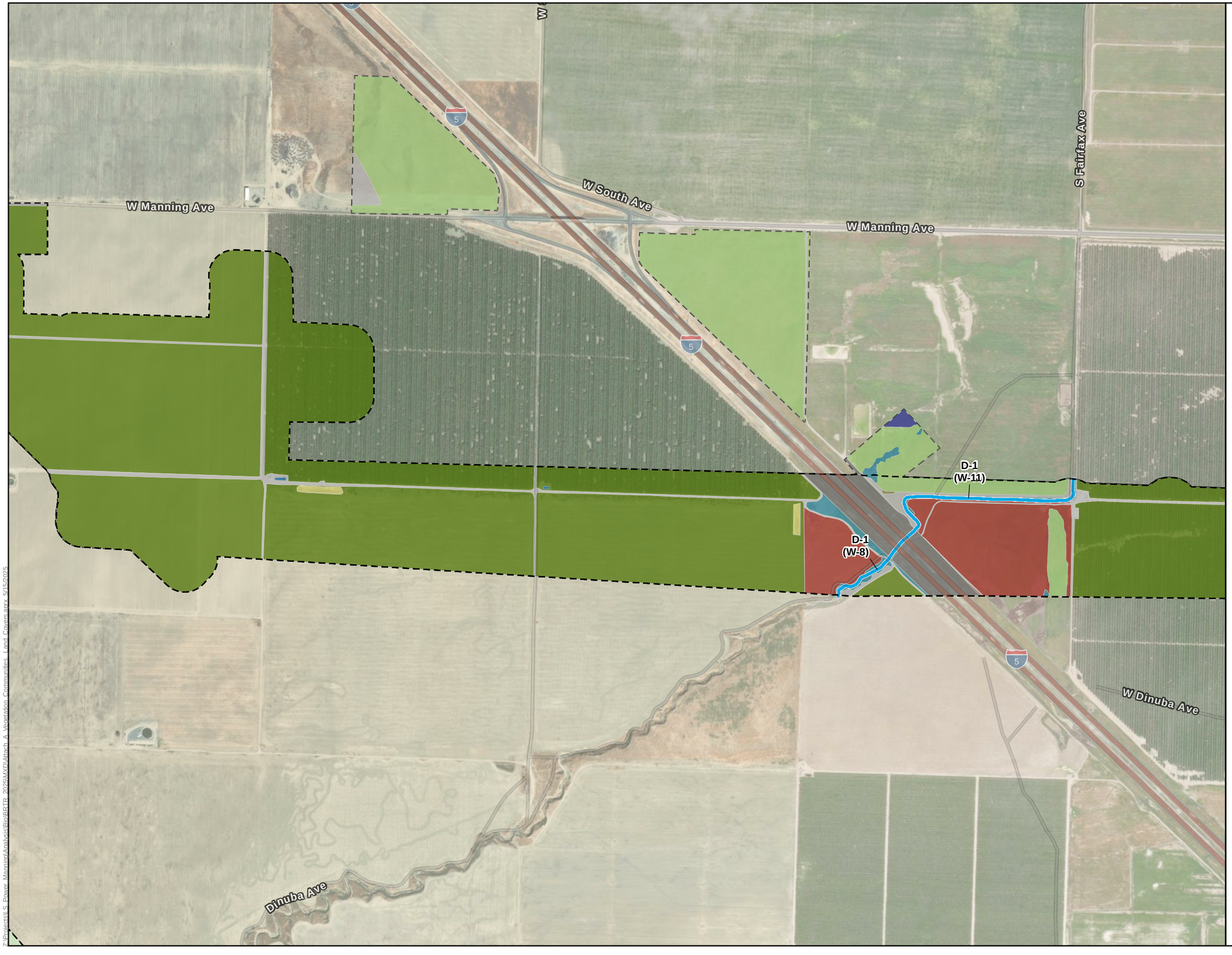


Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 2 of 15

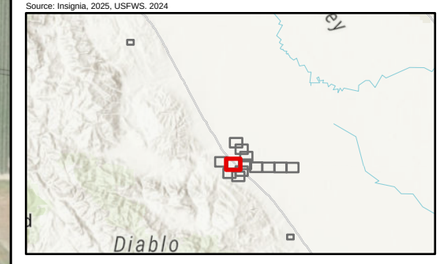
Manning 500/230 Kilovolt Substation Project

- Mapped Drainage
- Survey Area

Vegetation and Landcover

- Agriculture
- *Amsinckia (menziesii, tessellata) - Phacelia* spp. Herbaceous Alliance
- *Atriplex canescens* Shrubland Alliance
- *Atriplex lentiformis* Shrubland Alliance
- *Avena* spp. - *Bromus* spp. Semi-Natural Alliance
- *Brassica nigra - Centaurea (solstitialis, melitensis)* Herbaceous Semi-Natural Alliance
- *Bromus rubens - Schismus (arabicus, barbatus)* Herbaceous Semi-Natural Alliance
- Developed
- Disturbed
- Open Water
- Not Surveyed

Source: Insignia, 2025, USFWS. 2024



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Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 3 of 15

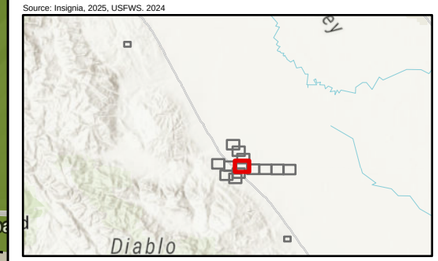
Manning 500/230 Kilovolt Substation Project

- Mapped Drainage
- Survey Area

Vegetation and Landcover

- Agriculture
- *Amsinckia (menziesii, tessellata) - Phacelia* spp. Herbaceous Alliance
- *Atriplex lentiformis* Shrubland Alliance
- *Bromus rubens - Schismus (arabicus, barbatus)* Herbaceous Semi-Natural Alliance
- Disturbed
- Not Surveyed

Source: Insignia, 2025, USFWS. 2024



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Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 4 of 15

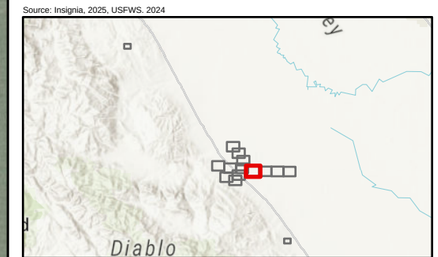
Manning 500/230 Kilovolt Substation Project

- Mapped Drainage
- Survey Area

Vegetation and Landcover

- Agriculture
- Developed
- Disturbed
- Open Water
- Not Surveyed

Source: Insignia, 2025, USFWS, 2024



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Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 5 of 15

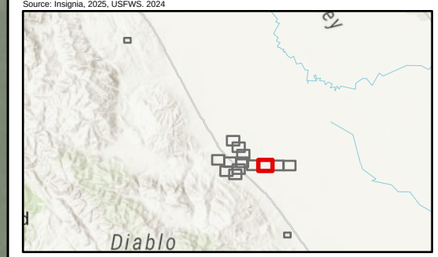
Manning 500/230 Kilovolt Substation Project

Survey Area

Vegetation and Landcover

- Agriculture
- *Atriplex lentiformis* Shrubland Alliance
- Developed
- Disturbed
- Open Water
- Not Surveyed

Source: Insignia, 2025, USFWS. 2024



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W Manning Ave
W Manning Ave
S Imperial Ave
S Imperial Ave
3rd St
W Dinuba Ave
S Washoe Ave
W Dinuba Ave
S San Diego Ave
W Dinuba Ave

Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 6 of 15

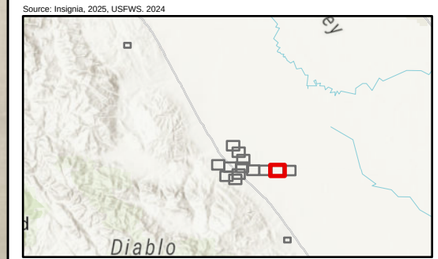
Manning 500/230 Kilovolt Substation Project

Survey Area

Vegetation and Landcover

- Agriculture
- *Brassica nigra - Centaurea (solstitialis, melitensis)* Herbaceous Semi-Natural Alliance
- Developed
- Disturbed
- Open Water
- Not Surveyed

Source: Insignia, 2025, USFWS. 2024



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Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 7 of 15

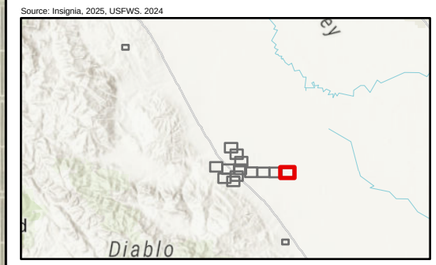
Manning 500/230 Kilovolt Substation Project

Survey Area

Vegetation and Landcover

- Agriculture
- *Brassica nigra - Centaurea (solstitialis, melitensis)* Herbaceous Semi-Natural Alliance
- Developed
- Disturbed
- Not Surveyed

Source: Insignia, 2025, USFWS. 2024



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W Manning Ave

W Manning Ave

S San Bernardino Ave

W Dinuba Ave

W Dinuba Ave

S Ohio Ave

W Dinuba

S San Bernardino Ave

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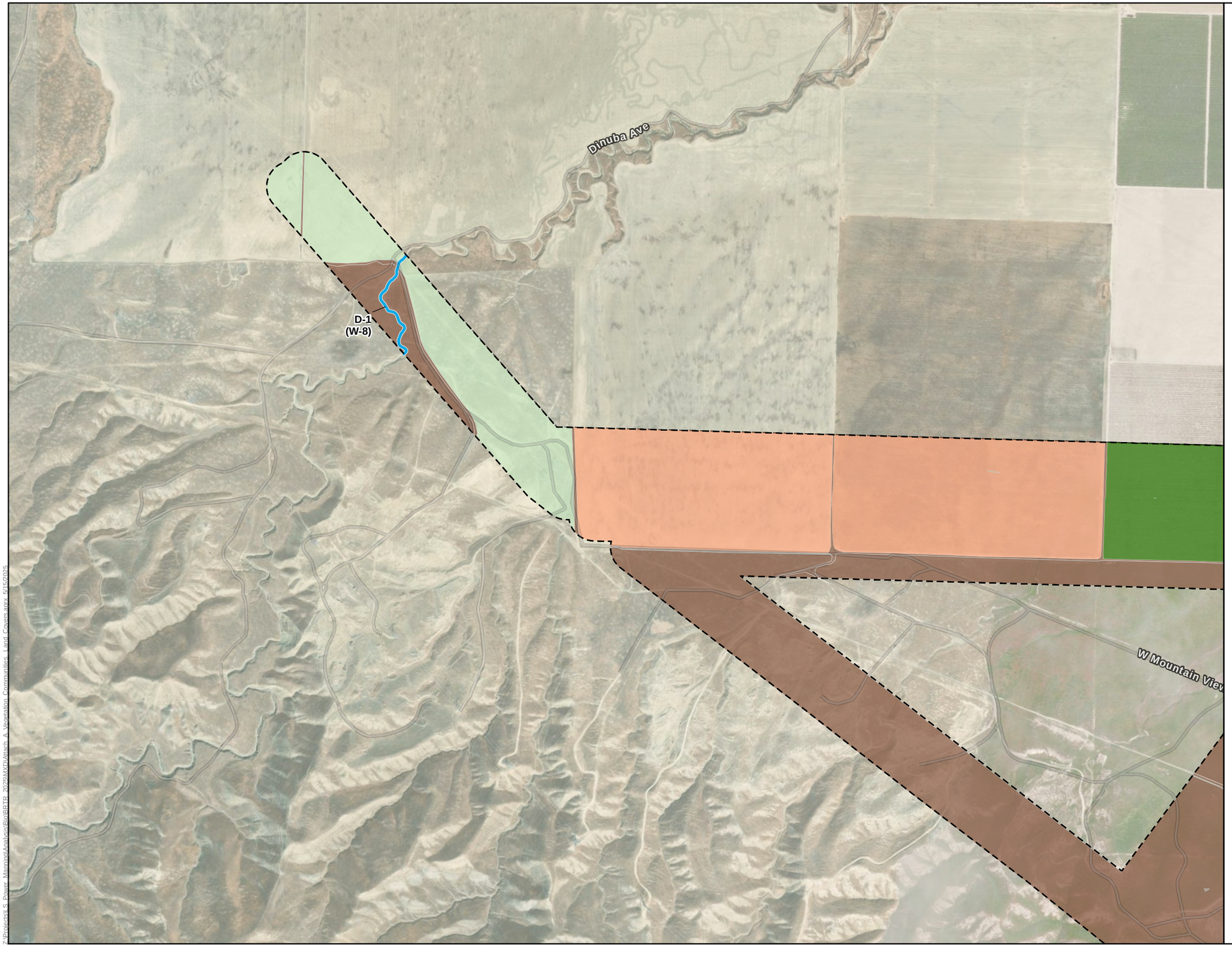

Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 8 of 15

Manning 500/230 Kilovolt Substation Project

Mapped Drainage

Survey Area

Vegetation and Landcover

Agriculture

Amsinckia (menziesii, tessellata) - *Phacelia* spp. Herbaceous Alliance

Avena spp. - *Bromus* spp. Semi-Natural Alliance

Disturbed

Not Surveyed

Source: Insignia, 2025, USFWS. 2024

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Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 9 of 15

Manning 500/230 Kilovolt Substation Project

Survey Area

Vegetation and Landcover

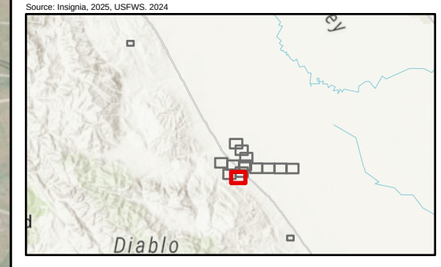
- Agriculture
- *Amsinckia (menziesii, tessellata)* - *Phacelia* spp. Herbaceous Alliance
- Disturbed
- Not Surveyed

W Mountain View Ave

S Hudson Ave

W Mountain View Ave

Source: Insignia, 2025, USFWS. 2024



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D-1
(W-8)

W Dinuba Ave

W Dinuba Ave

S Hudson Ave

W Mountain View Ave

S Hudson Ave

5

5

5

Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 10 of 15

Manning 500/230 Kilovolt Substation Project

Mapped Drainage

Survey Area

Vegetation and Landcover

Agriculture

Amsinckia (menziesii, tessellata) - Phacelia spp. Herbaceous Alliance

Atriplex lentiformis Shrubland Alliance

Bromus rubens - Schismus (arabicus, barbatus) Herbaceous Semi-Natural Alliance

Developed

Disturbed

Dry Lake / Mudflats / Playa

Not Surveyed

Source: Insignia, 2025, USFWS, 2024

Diablo

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Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 11 of 15

Manning 500/230 Kilovolt Substation Project

Mapped Drainage

Survey Area

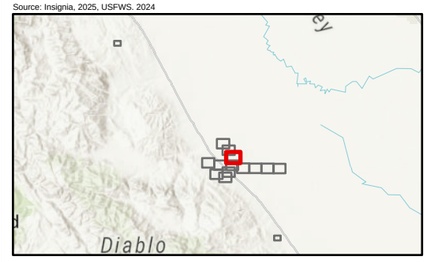
Vegetation and Landcover

Agriculture

Disturbed

Not Surveyed

Source: Insignia, 2025, USFWS, 2024



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S Fairfax Ave

S Hudson Ave

S Fairfax Ave

S Hudson Ave

Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 12 of 15

Manning 500/230 Kilovolt Substation Project

Survey Area

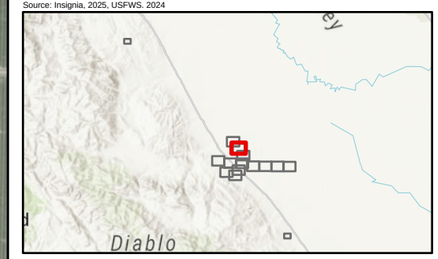
Vegetation and Landcover

Agriculture

Disturbed

Not Surveyed

Source: Insignia, 2025, USFWS. 2024



LSPOWER GRID CALIFORNIA

INSIGNIA ENVIRONMENTAL

1:11,000

0 500 1,000 Feet

Z:\Projects\LS Power_Manning\Analysis\Bio\BRTR_2025\MXD\Attach A Vegetation Communities, Land Covers.aprx, 5/15/2025

Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 13 of 15

Manning 500/230 Kilovolt Substation Project

Survey Area

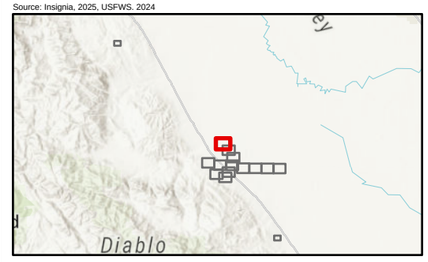
Vegetation and Landcover

Agriculture

Disturbed

Not Surveyed

Source: Insignia, 2025, USFWS. 2024



LS POWER GRID CALIFORNIA

INSIGNIA ENVIRONMENTAL

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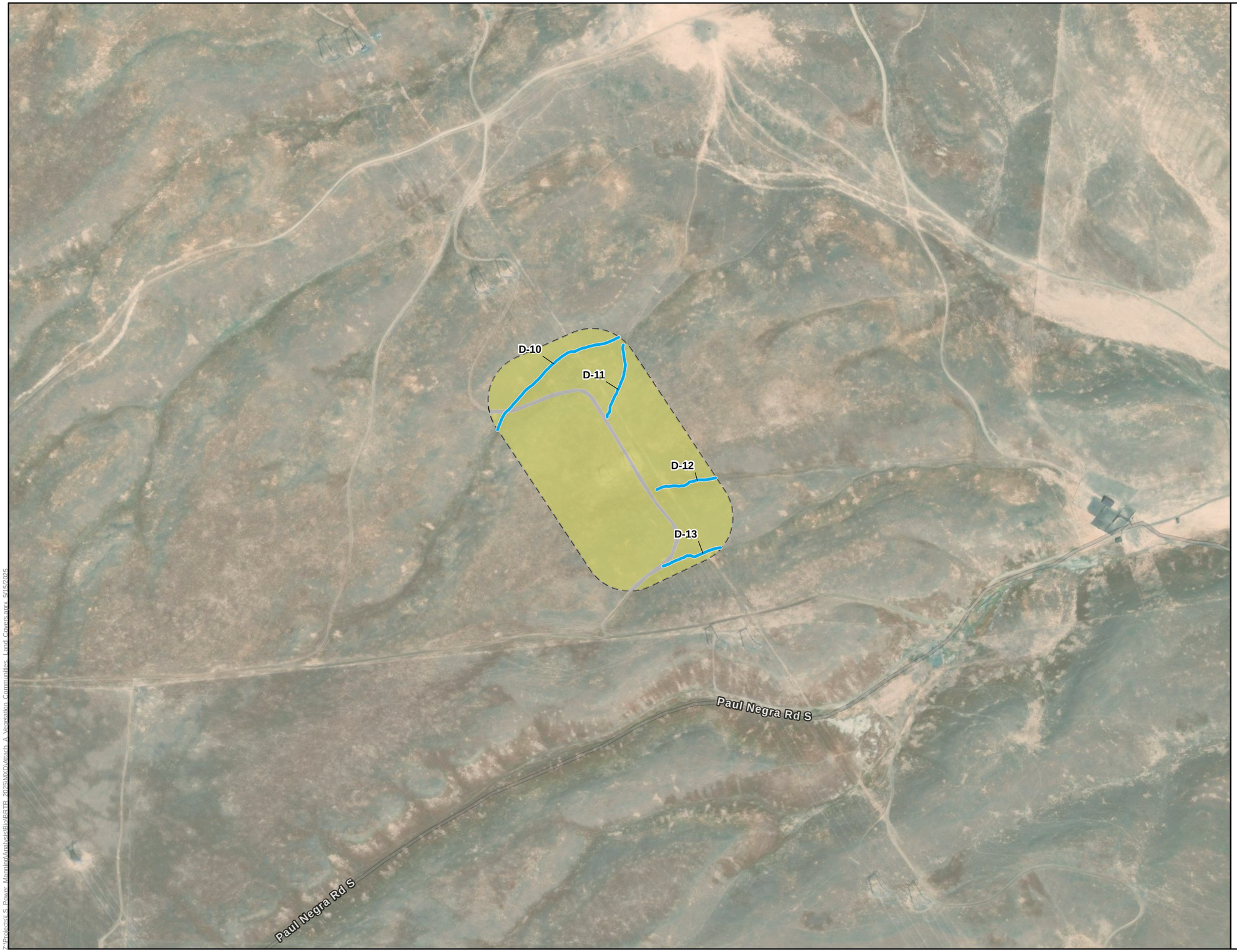


Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 14 of 15

Manning 500/230 Kilovolt Substation Project

Survey Area

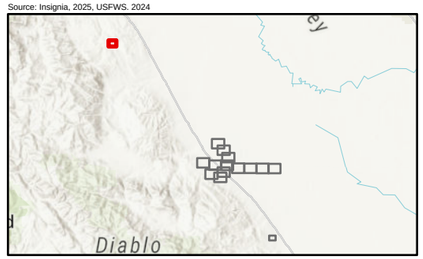
Vegetation and Landcover

Avena spp. - *Bromus* spp. Semi-Natural Alliance

Disturbed

Not Surveyed

Source: Insignia, 2025, USFWS. 2024



LSPOWER GRID CALIFORNIA

INSIGNIA ENVIRONMENTAL

1:6,000

0 500 1,000 Feet

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Attachment A: Vegetation Communities, Drainages and Land Cover Types
Map 15 of 15

Manning 500/230 Kilovolt Substation Project

Survey Area

Vegetation and Landcover

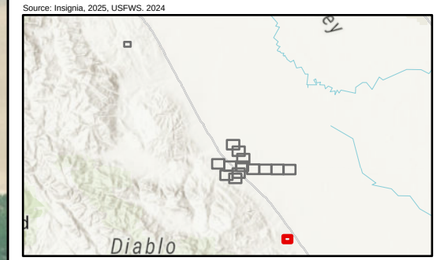
Atriplex polycarpa Shrubland Alliance

Bromus rubens - Schismus (arabicus, barbatus) Herbaceous Semi-Natural Alliance

Disturbed

Not Surveyed

Source: Insignia, 2025, USFWS. 2024



LSPOWER GRID CALIFORNIA

INSIGNIA ENVIRONMENTAL

1:6,000

0 500 1,000 Feet

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