

October 19, 2022

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

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

Dear Mr. Chiang:

Please see the document titled TLRR CSP PEA Deficiency Letter 2\_Long-Term Responses, included in this submittal for SCE's responses to the CPUC's July 15, 2022 PEA deficiency letter. The response matrix includes responses to the deficiencies SCE and the CPUC have agreed to as long-term deficiencies.

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

Sincerely,

*/s/ David Balandran*

David Balandran  
Senior Advisor, Regulatory Affairs  
Southern California Edison Company

Enclosures

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PEA Deficiencies Section or Page #	Comment Code	Deficiency	Response/Modified Text
<b>Chapter 5: Environmental Analysis</b>			
<b>5.5 Cultural Resources</b>			
Section 5.5.1.7.2	CUL-7	<p><b>Built Environment Types</b> 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> <p><b>Deficiency response notes that Agriculture and Ranching sites are like Homesteading sites, but how they are differentiated is not explained. Provide that information.</b></p>	<p>See suggested revision to clarify the difference between Agriculture and Ranching sites and Homesteading sites:</p> <p>5.5.1.7.2.1.2 Built Environment Resource Types</p> <p>Common built environment resource types in the Project area include water conveyance, electrical power conveyance, mining, transportation, homesteading and settlement, agriculture and ranching, and recreation.</p> <p>Water Conveyance: Property types associated with water resources generally fall into three broad categories: production and collection, treatment, and distribution. The most common type of water resource in the Project area are distribution features such as canals, ditches, and water control structures.</p> <p>Electrical Power Conveyance: Property types associated with electric power conveyance start with generation, followed by transmission, and ending with distribution. The most common type of electrical power resources in the project area are transmission lines. One of the most significant sites of this type in the Project area is the SCE Bishop Creek Hydroelectric System Historic District, a generation facility.</p> <p>Mining: While there is a bewildering range of individual features that might be encountered on mining property sites, most resources have some association with the three main processes of the mining industry: extraction of the raw ore from the earth, processing the ore for treatment (called beneficiation), and refining which is enhancing the value of the mineral product until it reaches a final state. The most common mining site in the Project area are roads, which supported the mining operations, and the mines themselves.</p> <p>Transportation: Due to the linear nature of the Project corridor and the fact that transportation facilities are also linear, there are many locations where transportation resources cross the Project. These include roads, highways, and railroads. The Laws Narrow Gauge Railroad Historic District is listed on the National Register. Roads are the most numerous property type in the project area.</p> <p>Homesteading and Settlement: <del>Property types associated with homesteads</del> <u>Homesteading and settlement properties are associated with acquiring land from the public domain (homesteading) and the resulting towns themselves (settlement) such as Bishop, Lone Pine, and Independence. While many homesteads were agricultural and rural, not all were. Settlements are exclusively urban and include non-residential aspects such as utilities, roads, and commercial structures. The homesteading/settlement theme predominantly covers town and urban properties, s are broad. For early homesteads, these include houses, outhouses, water production and conveyance features such as wells and tanks, remains of agricultural fields and orchards, and stock raising buildings such as barns and corrals. Property types associated with townsites and urban development also cover a wide range. These start with basic residential and commercial buildings for housing and for business activities. There is a wide range of infrastructure associated with settlement that is part of the built environment.</u></p> <p>Agriculture and Ranching: <del>As A</del> <u>griculture and ranching properties often started as homesteads, but</u></p>

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			<p><del>many later expanded to include large tracts of land. property types of domestic homes and production areas are like homesteading sites.</del> <u>This theme includes both the residential aspect of farms and ranches, as well as outbuildings and support structures related to growing crops and animal husbandry. Unlike the homesteading/settlement theme, agriculture and ranching properties are predominately rural.</u></p> <p>A significant ranching resource in the project area is the Roberts Ranch Historic Site.</p> <p>Recreation: Property types for the recreation theme are varied and can range from rustic yet luxurious lodges to unimproved backcountry campsites. Although no specific recreational properties are in the APE, roads that provide access to popular recreational destinations such as US Highway 395, US Route 6 and State Route 168 were identified as significant for their association with this resource type.</p> <p>5.5.1.7.2.2 Results</p> <p>As part of desk and field survey activities, 88 historic-era (at least 45 years of age) built environment resources were identified and observed within the APE and (Table 5.5-2). One previously recorded property could not be located, and one additional previously recorded property was not updated due to age ineligibility. Property types encompass the wide range of historic themes identified. These include water conveyance, electrical power conveyance, mining, transportation, homesteading and settlement, agriculture and ranching, and recreation. Of the 88 historic-era resources, 73 directly intersect with the Project. All 88 historic-era resources were evaluated for the NRHP/CRHR. Of these, 69 were recommended not eligible to the NRHP/CRHR and 19 were recommended eligible to the NRHP/CRHR (Table 5.5-2).</p>
Section 5.5.1.7.2 Table 5.5-2	CUL-9	<p><b>Built Environment Resources</b> Replace "improvement" with "resource" throughout this section to avoid confusion; resource should be applied to both elements of the built environment and archaeological resources. <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	CUL-13	<p><b>Section 4.3 Research Themes/Section 4.3.1 Prehistoric Research Themes/ Pages 38-39</b> 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." <b>Adding additional information may not change the eligibility, but may change why a site is eligible. Please add that information for sites where you know other criteria are applicable. Provide updated Appendix D Class III Archaeology Survey Report with revisions incorporated.</b></p>	Noted. Additional language has been added to Section 4.3.1 of the Class III report regarding -the potential for prehistoric resources to be eligible under Criteria A/3 and C/3 in addition to Criterion D/4.
Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	CUL-14	<p><b>4.3.2 Historic Research Themes / Page 38</b> Like comment CUL-12, provide similar discussion for historic era archaeological sites. <b>Adding additional information may not change the eligibility, but may change why a site is eligible. Please add that information for sites where you know other criteria are applicable. Provide updated Appendix D Class III Archaeology Survey Report with revisions</b></p>	Noted. Additional language has been added to Section 4.3.2 of the Class III report regarding the potential for prehistoric resources to be eligible under Criteria A/3 and C/3 in addition to Criterion D/4.

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		<b>incorporated.</b>	
Appendix D. Cultural Resources Studies. Class III Archaeological Survey Report.	CUL-15	<p><b>Resource Evaluation</b> 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.</p> <p><b>Provide updated Appendix D Class III Archaeology Survey Report with revisions incorporated.</b></p>	The cabin has been evaluated by Urbana as part of the HBER revisions. The evaluation and updated DPR is included in the HBER.
Appendix D Historic Era Built Environment Survey Report	CUL-16	<p><b>Period of significance - Global throughout Sections 4 and 5</b> 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. Revise the period of significance for each of the themes outlined such that they:</p> <ul style="list-style-type: none"> <li>• encompass the entire era discussed in each narrative history</li> <li>• 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].)</li> <li>• both begin and end at dates that <ul style="list-style-type: none"> <li>• mark the start/end of an era based on a historical event AND/O</li> <li>• mark the construction date of an important resource within the APE</li> </ul> </li> </ul> <p><b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-17	<p><b>Document structure Report sections 4 and 5</b> 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. 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. <b>Add clarifications identified in the deficiency response. Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-18	<p><b>Explanation of source document development Global throughout document</b> 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</p>	This comment is addressed in the revised HBER, which has been provided under separate cover.

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		documents, the reader does not require an explanation of when/why they were created or of the strengths and weaknesses of each document. <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b>	
Appendix D Historic Era Built Environment Survey Report	CUL-19	<b>Use of "improvement" Global throughout document</b> 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. <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-20	<b>Use of "cultural properties" Global throughout document</b> 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. <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-21	<b>Significance criteria, character-defining features, and integrity thresholds Global throughout Sections 4 and 5</b> 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. <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-22	<b>Geographic areas Global throughout Sections 4 and 5</b> 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. <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-23	<b>Biographical information Global throughout Sections 4 and 5</b> 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. <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-24	<b>Historic context: Property/ resource types Global throughout section 5</b> 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.	This comment is addressed in the revised HBER, which has been provided under separate cover.

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		<p>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.</p> <p><b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	
Appendix D Historic Era Built Environment Survey Report	CUL-25	<p><b>Historic context: Theme 1: Water Conveyance, 1870s-1930s (27-29)</b> Justify/break up periods of significance as discussed above. Revise the discussion of Native American irrigation structures in the area. The draft cites a single source and uncritically accepts its contradictory claim that indigenous groups developed extensive irrigation systems yet did not 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. Discussion of early Euro-American irrigation structures must be introduced in the context of settlement and agricultural development in the region, including a brief explanation of the types of agriculture undertaken. The current draft does not explain the use of ditches and diversions. Provide a separate section for Los Angeles Department of Water and Power's (LADWP's) acquisition of water rights in Owens Valley and subsequent development of the Los Angeles aqueduct, an extraordinarily important theme. Utilize multiple sources including the Caltrans water conveyance context and other sources as necessary to develop additional detail and identify periods of significance based on events. The current draft begins the discussion of this context in the middle of the paragraph, making it difficult for the reader to identify as significant.</p> <p><b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-26	<p><b>Historic context: Theme 2: Electric Power Conveyance, 1900-1964 (28-30)</b> 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. 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. 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. 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.) 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>	This comment is addressed in the revised HBER, which has been provided under separate cover.

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		<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. 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> <p><b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	
Appendix D Historic Era Built Environment Survey Report	CUL-27	<p><b>Historic context: Theme 3: Mining, 1850s-1960 (33-35)</b></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> <p><b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-28	<p><b>Historic context: Theme 4: Exploration, Transportation and Travel Pathways, 1860s to 1961 (36-46)</b></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>	This comment is addressed in the revised HBER, which has been provided under separate cover.

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		<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 temporal descriptors like “eventually;” they should be replaced with specific dates or at least decades.</p> <p><b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	
Appendix D Historic Era Built Environment Survey Report	CUL-29	<p><b>Historic context: Property/ resource types Global throughout section 5</b> 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> <p><b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-30	<p><b>Historic context: Theme 6: Homesteading and Settlement, 1862-1950s (50-52)</b> 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. Explain the distinction between agriculture and ranching. The period of significance for this section is not appropriate, as settlement activities in California were generally suspended by about 1890. If the period was longer in this area explain why and when it ended; 1950, however, is unlikely to be the end of this period of significance. Consider shortening this section and making it part of theme 5 since it includes little information that does not relate to settlement driven by ranching and agriculture. If the section is retained, the current text should form an introduction with the local histories from section 4 should be incorporated afterwards.</p> <p><b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D Historic Era Built Environment Survey Report	CUL-31	<p><b>Historic context: Theme 7: Recreation, 1910s-1950s (53-58)</b> 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. 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</p>	This comment is addressed in the revised HBER, which has been provided under separate cover.

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		<p>improvements in roads, ubiquity of personal automobiles, rising incomes, and/or other historical factors contributed to the increase in tourism. Remove discussion of Devil’s Postpile, rainbow falls, and any other locations which are outside the project area and marginally relevant (page 54). Details about the history of mining should be removed from this section and added to the mining section. Only facts directly relevant to the recreation theme, such as the use of mining roads to provide access to local attractions, should be included in this section (pages 54 – 55). <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	
Appendix D DPR 523 Forms	CUL-32	<p><b>DPR 523 Forms – Basic Methodology</b> 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. An adequate evaluation must describe:  <ul style="list-style-type: none"> <li>▪ The specific aspect of the prehistory or history that the resource represents.</li> <li>▪ Whether that prehistory or history is significant.</li> <li>▪ Whether the resource possesses the physical features necessary to convey the aspect of prehistory or history.</li> <li>▪ If the resource is historically significant (eligible for the California Register of Historical Resources), the integrity of the resource must also be described.</li> <li>▪ Integrity – <ul style="list-style-type: none"> <li>o Location – the place where the resource was constructed or where the historic event occurred</li> <li>o Design – the combination of elements the create the form, plan, space, and style of the resource</li> <li>o Setting – physical environment of a resource</li> <li>o Materials – the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form the resource</li> <li>o Workmanship – the physical evidence of the crafts or a particular culture or people during any given period in history or prehistory</li> <li>o Feeling – a resource’s expression of the aesthetic or historic sense of a particular period of time</li> <li>o Association – the direct link between an important historic event or person and the resource</li> </ul> </li> </ul> <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D DPR 523 Forms	CUL-33	<p><b>DPR 523 Forms – Language</b> Use “is recommended” eligible/ineligible rather than “appears.” <b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	This comment is addressed in the revised HBER, which has been provided under separate cover.
Appendix D DPR 523 Forms	CUL-34	<p><b>DPR 523 Forms – Organization</b> 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 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</p>	This comment is addressed in the revised HBER, which has been provided under separate cover.

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

PEA Deficiencies Section or Page #	Comment Code	Deficiency	Response/Modified Text
		<p>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.</p> <p>(These deficiencies are in addition to the failure to evaluate within the historic context described above.)<sup>1</sup></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> <p><b>Provide updated Appendix D Historic Era Built Environment Survey Report with revisions incorporated.</b></p>	
<b>5.7 Geology, Soils, and Paleontological Resources</b>			
Appendix K Paleo Report Errata Sheet	<b>GEO-9</b>	<p><b>Paleontological Resource Records Search Results</b></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> <p><b>Provide an updated Appendix K Paleontological Report. The revised report provided includes an email exchange with UCMP discussing records search results, but does not include the records search results.</b></p> <p><b>We also note that the search appears to have requested only vertebrate localities, which is inappropriate for a Precambrian – Lower Paleozoic section; this was the subject of one of our prior pre-filing comments.</b></p> <p><b>Additionally, the email exchange is dated 2017, so it doesn’t address the records search that appears to have been conducted in 2020 in response to our prior comments (cited in the Errata sheet provided in 2021). Results of both searches should be included.</b></p>	<p>Revised Appendix K with un-redacted records search has been provided in response to Deficiency Letter #1, batch 3 responses.</p> <p>The presumption regarding the 2020 citations is incorrect; these two references are for searches of online databases. These are different than requesting museum records searches, where the museums provide written results. These databases are open to the public so the results can be retrieved by anyone.</p> <p>As shown in the email exchange, no records were identified by UCMP; this constitutes the “record search results”.</p> <p>The search did not request only vertebrate localities; a complete search of the museum collections, including plants and invertebrates in addition to vertebrates, was requested. That the museum responded with only plant and vertebrate fossil specimens is not an indication that a complete search was not requested; it is an indication that the search simply did not yield any invertebrate results.</p>