



California Public Utilities Commission



May 17, 2025

VIA EMAIL

Dustin Joseph
LS Power Grid California, LLC
6701 Kroll Center Parkway, Suite 250
Pleasanton, CA 94566
Via email: djoseph@lspower.com

Subject: Data Request 3: Supplemental Biological Survey Information for the Manning 500/230 kV Substation Project (Application 24-06-017)

Dear Mr. Joseph:

The California Public Utilities Commission (CPUC) Energy Division, California Environmental Quality Act (CEQA) and Energy Permitting Section is preparing a Final Initial Study/Mitigated Negative Declaration (IS/MND) for the Manning 500/230 kV Substation Project (project) proposed by LS Power Grid California, LLC (LSPGC). While some areas remained unsurveyed for biological resources at the time of the release of the Proposed IS/MND on March 19, 2025, we understand that biological resources surveys have since been completed throughout the entire project alignment. The CPUC is requesting the information specified in Attachment 1 regarding updated biological resources information in the previously unsurveyed areas.

Please provide the requested information, or explain why it cannot be provided, by May 23, 2024.

Please do not hesitate to call me at (213) 266-4748 if you have questions.

Sincerely,

A handwritten signature in black ink that reads "Tommy Alexander".

Tommy Alexander
CEQA Project Manager
CPUC Energy Division

cc: Michelle Wilson, CPUC Energy Division
Heather Blair, Ascent Environmental
Kari Zajac, Ascent Environmental
Margaret Bratcher, LSPGC
Clayton Eversen, LSPGC
James Schuchard, LSPGC

Attachment: Data Request 3

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Data Request 3 Manning 500/230 kV Substation Upgrade Project (A.24-06-017) CEQA Evaluation

Please provide the information specified below regarding the biological survey results for the Manning 500/230 kV Substation Upgrade Project, including updated text to replace the placeholder text highlighted in **yellow**.

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.

Table 2-8 Impacts on Vegetation Communities

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	159.0	0.18	23.4	0.2	0.02	0	182.4	0.4
Annual Grassland ¹	0	0	33.3	0.2	0	0	33.3	0.2
Developed	0.3	0	0.7	0	0	0	1	0
Disturbed	5.5	1.2	31.9	0.6	25.2	13.1	62.6	14.9
TBD²	32.4	2.4	68.5	1.1	59.1	0	160	3.5
Total³	192.2	3.8	157.8	2.1	84.3	13.1	439.3	19.0

¹ *Amsinkia (menziesii, tessellate)*, *Phacelia* spp. Herbaceous Alliance, and *Avena* spp. (*Bromus* spp., Herbaceous).

² Area was not surveyed due to lack of permission from private property owners. Follow-up surveys would be conducted pending landowner approval for survey access.

³ Totals may not sum due to rounding.



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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.

From page 3-38 of the proposed IS/MND with draft updates shown in underline including placeholders for additional information:

Aquatic Features

Insignia Environmental conducted a preliminary assessment of water features potentially under the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW on October 17 and 18, November 6 to 8, and November 13, 2023 (Insignia Environmental 2024) and a follow-up survey in [date] 2025 of previously unsurveyed areas (Insignia Environmental 2025). Six potentially jurisdictional water features were identified within the survey area in 2023, and 15 additional potentially jurisdictional water features were identified in previously unsurveyed areas (Insignia Environmental 2025). Four of the potentially jurisdictional water features are ephemeral streams located in the western region of the survey area near PG&E's existing Los Banos-Midway #2 500 kV and Los Banos-Gates #1 500 kV transmission lines. The remaining two Two features are agricultural ditches located along West Manning Avenue (Insignia Environmental 2024). The remaining 15 features are [need updated BRTR] (Insignia Environmental 2025).

Additionally, the California Aqueduct would be crossed by the proposed PG&E 230 kV Reconductoring and the proposed LSPGC 230 kV transmission line between South Douglas Avenue and South Lyon Avenue. The California Aqueduct falls under the jurisdiction of the California Department of Water Resources.

3. Provide supporting rationale for why Tulare grasshopper mouse (*Onychomys torridus tularensis*) does not have potential to occur in the project area.

From page 3-95 of the proposed IS/MND: "Based on a review of aerial imagery in unsurveyed portions of the project alignment area, shrub habitat may be present, which may provide nesting habitat for loggerhead shrikes." Provide information on the presence of suitable habitat for loggerhead shrike in previously unsurveyed areas.