PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

July 19, 2023

Ms. Lori Charpentier
Licensing/Regulatory Affairs
Southern California Edison
2244 Walnut Grove Ave.
Rosemead, CA 91770

Re: Data Request #14 for the SCE Ivanpah-Control (I-C) Project (A.19-07-015)

Dear Ms. Charpentier:

Southern California Edison Company (SCE) submitted its Amended Permit to Construct (PTC) application and Proponent's Environmental Assessment (PEA) on April 13, 2020. The PTC application was deemed complete on May 31, 2023.

To support our review of the project and potential alternatives, we are requesting additional data (Data Request #14).

DR 14.1: Biological Resources (Proposed Project and LADWP Alternatives)

We have reviewed the biological resources data provided by SCE to date. Based on our recent experience with the CEQA and permitting requirements of the California Department of Fish and Wildlife (CDFW) related to species added to the Candidate Species list (Western Joshua Tree and Crotch Bumble Bee), we believe that they may require additional information for the EIR. In addition, our recent experience leads to expect that the CDFW may require additional information on paleochannels, which were not mapped as State jurisdictional waters during the initial jurisdictional delineation.

We want to ensure that our EIR is adequate to support SCE's permitting for both endangered species and for waters of the state. While additional surveys may be required, there may also be mitigation options that would allow surveys to be completed prior to construction.

To define the most logical path forward, we suggest that we hold a meeting with SCE's biology team (and the BLM biology team, if they are interested in participating) to discuss our experiences with these requirements and define a path for addressing these requirements.

DR 14.2: Cultural Resources (Proposed Project)

Archaeological testing was completed by SCE's consultants for specific sites defined by the BLM and CPUC Cultural Resources team. Testing was completed only for certain portions of many sites because some site boundaries extended outside of the Area of Potential Effect (APE). For the Aspen team to complete eligibility assessments, we request that "Shovel Test Unit (STU) level data" for four specific sites as specified below be provided to the CPUC's cultural resources team. The STU data would be used by the CPUC team to better understand the landforms and stratigraphic integrity observed during each test and how that could relate to the rest of the site (extending beyond the tested area). This information will support the CPUC team's recommendations of site eligibility. The STU level and unit forms would include

more detail than is presented in the report of these investigations. The STU data will be in the files of the SCE consultants and requires only scanning of certain field documents to provide to the CPUC team.

Following are the 4 sites for which we request that this data be provided, and an explanation of the rationale for each request.

SWCA BLM sites:

- **SWCA-L030-6419** – "While one STU produced a sparse scatter of five flakes to a depth of 50 cm below surface, the evidence of recent disturbance to the site may indicate post-depositional burial of cultural materials in this area." The forms from this site may indicate how the stratigraphy in the STUs demonstrate the disturbance.
- **SWCA-L030-15068** – "A thin layer of dark organic matter was noted in the northern portion of the STU at 26 cmbs." Information on the form might indicate that this organic matter relates to potential cultural layers in other portions of the site or whether it is natural and related to the landform.

SWCA LADWP sites:

- **SWCA-L030-1007** – "A total of 3.11 g of bone was recovered from STU 1 (Table 6.66)." We would like to review the forms from this site to see if there was evidence of burrows or another bioturbation. There may also be additional data on the nature of the bones observed.

SWCA NAWS sites:

- **P-14-009484** – Bioturbation is shown in the wall profiles for TU1 however little to no description of whether it continued into the excavated portion of the unit or how it might impact the site integrity. Forms from this unit may provide additional insight into how bioturbation affected buried deposits or overall integrity and, by extension, eligibility.

Alternatives Analysis

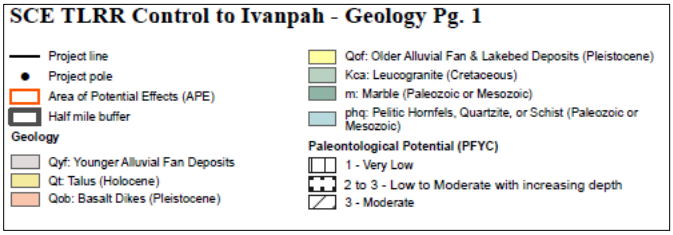
The CPUC and the BLM have agreed to evaluate three alternative segments that would parallel the Los Angeles Department of Water and Power (LADWP) facilities. To properly evaluate those alternative segments under CEQA, we require comparable information on the environmental conditions in the alternative area to support our comparative analysis of effects. The following information is required for the alternative segment areas.

DR 14.3: Paleontology (LADWP Alternatives)

The *Paleontological Evaluation and Inventory Report* submitted to the BLM for the I-C Project (Paleo Solutions, Inc., December 2020) used the Potential Fossil Yield Classification (PFYC) system to classify the lands crossed by I-C Project components. This information is used in the EIR to define mitigation requirements for different route segments.

For the EIR to present a parallel analysis of the LADWP Alternatives and compare these route segments with the equivalent segments of the proposed project, we will need PFYC data and geologic mapping for the three alternative segments, as was presented in Appendix A of the 2020 report (see legend excerpt below). We do not need any other updates to the report. We expect that this is a desktop exercise.

Legend from Appendix A Map:



DR 14.4: Visual Photosimulations (LADWP Alternatives)

Simulations of the I-C transmission line in key locations along the three LADWP alternative segments are required (see list below). We would like to coordinate these requests with the BLM team before they are finalized but want SCE to be aware that this request is coming.

Fossil Falls Alternative

- Existing KOP 1-17 Fossil Falls Trail
- Existing KOP 1-18 US 395 at Little Lake

Manzanar Alternative

- Existing KOP 1-7 Manzanar

Fish Springs-Crater Mountain Alternative

- New Southbound US 395 KOP at North Fish Springs Rd. (Lat: 37.105682 deg. / Long: -118.253229 deg.)

Conclusion. We understand that the timeframe for assembling the data requested for each of the issues defined above will be different. Please respond to this request within 2 weeks with a proposed approach and provide a copy to our CEQA consultant (Susan Lee at Slee@aspeneg.com). Additional data requests may be necessary to address other issues as we move forward with EIR preparation. Any questions on this data request should be directed to me at (916) 217-5073 or by email at john.forsythe@cpuc.ca.gov.

Sincerely,

John E. Forsythe
Project Manager for the I-C Project
Energy Division CEQA Unit

cc: David LeBlond, Southern California Edison (David.leblond@sce.com)
Elaine Sison-Lebrilla, Manager CEQA and FERC Branch (CPUC)
Joan Patrovsky, Project Manager, BLM
Susan Lee and Beth Bagwell, Aspen Environmental Group
Susanne Heim, Panorama Environmental
Peter Rocco, Jo Render, Galileo
Jace Fahnestock and Kelly Green, Northwind
Paul Callahan, Burns and McDonnell