

Southern California Edison
A.19-07-015 – TLRR IC

DATA REQUEST SET E D - S C E - 0 1 4

To: Energy Division
Prepared by: Gary Busted
Job Title: Environmental Services, Senior Advisor
Received Date: 7/19/2023

Response Date: 8/2/2023

Question 14.1:

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.

Response to Question 14.1:

SCE agrees a meeting to discuss minimization impacts and mitigation approach to Western Joshua Tree and Crotch Bumble Bee would be useful. SCE is internally discussing its approach and will engage the CPUC team in August 2023 to set up a meeting.

SCE and their consultant have surveyed for jurisdictional waters for both the proposed and alternative routes. Paleochannels are covered in the surveys, if found within the survey corridor, but may not be called out specifically as paleochannels. SCE can also set up a discussion in August with the Energy Division and SCE's consultant and subject matter experts to discuss this issue.

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Question 14.2:

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 site 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 site: 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.

Response to Question 14.2:

SCE's consultant will provide the confidential Shovel Test Unit data for the four listed sites directly to CPUC Consultant, Beth Bagwell, by August 11, 2023.

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Question 14.3:

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.

Response to Question 14.3:

SCE anticipates providing the requested Potential Fossil Yield Classification (PFYC) data and geologic mapping for the three alternative segments in support of the CPUC's and BLM's analysis of the three proposed alternatives. Currently SCE does not have an anticipated date of delivery but will provide an update on when it is available.

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Question 14.4:

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.

Response to Question 14.4:

SCE awaits further comments or requests from the CPUC and the BLM regarding visual simulations necessary to analyze aesthetic impacts of the three alternative routes.

SCE anticipates the three BLM proposed alternatives would utilize the same structure types (TSPs) as the Proposed Project, and therefore appear visually similar to the Proposed Project design.

However, the three BLM proposed alternatives will be located farther away from the Key Observation Points than the Proposed Project. Therefore, SCE anticipates there will be fewer visual impacts associated with the BLM proposed alternatives than SCE's Proposed Project, given similar engineering design and increased distance from sensitive viewers.

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DATA REQUEST SET E D - S C E - 1 4 A - F o l l o w - u p

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Prepared by: Gary Busted
Job Title: Environmental Science, Senior Advisor
Received Date: 10/26/2023

Response Date: 11/9/2023

Question 14A.1:

We suggested 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 the new listed species and associated permitting requirements and define a path for addressing these requirements. □ Follow-up: We are still waiting for SCE's team to suggest some possible meeting dates.

Response to Question 14A.1:

SCE scheduled a meeting to discuss sensitive environmental resources with the CPUC, BLM, and SCE biological resources subject matter experts. The meeting will be held Thursday, November 16, 2023 at 10:00a.m. and will include discussion of permitting pathways for western Joshua tree, Crotch's bumble bee, and paleochannels.

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Received Date: 10/26/2023

Response Date: 11/9/2023

Question 14A.3:

We requested that SCE provide the paleontology data and geologic mapping for the three alternative segments, as was presented in Appendix A of the 2020 Paleontology report. □ Follow-up: SCE responded on August 3, 2023 that it would provide this information but did not have an anticipated delivery date. Please provide the date for this information to be provided to us.

Response to Question 14A.3:

SCE anticipates submitting the draft Paleontology Report for the three alternative segments to the CPUC and BLM on or before December 22, 2023.