

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

**DATA REQUEST SET E D - S C E - 0 2 3**

**To: Energy Division**  
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**Job Title: Sr. Construction Project Manager**  
**Received Date: 10/22/2025**

**Response Date: 10/30/2025**

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**Question 001:**

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. This data request defines additional information required for the notification of publication of the Draft EIR.

**Avoidance of Environmentally Sensitive Area:**

The analysis of cultural resources has identified an environmentally sensitive area (ESA) that needs to be avoided by project construction. The area is located surrounding and primarily northeast of New Structure 465, which is located about 1.5 miles north of the town of Lone Pine (see map on next page). We request that SCE evaluate the feasibility of a single-structure and access road reroute, in which structure 465 and a revised access road would be moved about 150 feet to the southwest. This would avoid impacts of structure construction within the ESA. Response.

**Response to Question 001:**

SCE has reviewed this request and generally agrees that relocating this structure could have benefits. However, based on SCE's understanding of this area, relocating structure T465 approximately 150 feet to the southwest would not ensure avoidance of the environmental resource and may cause additional impacts to the resource, as the exact western boundary of the resource is unknown due to the area's geology and topography (e.g., sand dunes). Further, if structure T465 is relocated as proposed, SCE would need to construct a new stub road to access the structure, which would greatly increase ground disturbance in the area. Finally, relocating the structure as proposed would place the structure out of the existing alignment which would require SCE to change the designed structure from a lightweight steel pole (LWS) to a tubular steel pole (TSP) with an engineered concrete foundation. Installing a TSP requires much more equipment, thereby potentially increasing the likelihood of impacts to resources located in the ESA.

As an alternative solution, SCE recommends spanning the identified boundary of the ESA by relocating structure T465 approximately 200 feet to the southeast, following the current project alignment, to a location adjacent to the existing access road, as shown in the screenshot image below (shown in neon green). This revision would necessitate adjusting the locations of several additional structures to the south (and potentially to the north) along the alignment, to equalize span lengths as much as possible, but would not require a change to the proposed structure type or access via a new spur road. The cultural survey for this area did not identify any other ESAs to the south of

this location. Therefore, SCE believes that staying along the existing access road and relocating structures to span the ESA is the most effective solution to accomplish the intent of this request.

Additionally, SCE notes that if the Bureau of Land Management's "Manzanar Alternative" route is selected as part of the final project, the new alignment would relocate the line entirely outside this ESA, with only the construction impacts associated with the removal of these facilities remaining.

