

## Email: SCE Ivanpah Control

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**From:** Yvonne D Nemeth <EVIE.NEMETH@SCE.COM>  
**Sent:** Friday, May 15, 2026 2:41 PM  
**To:** Ivanpah-Control Project Team; Forsythe, John; Susan Lee; Susanne Heim  
<susanne.heim@panoramaenv.com> Heim  
**Cc:** Wilson, Michelle; Lori Charpentier  
**Subject:** Draft EIR Comments -SCE Ivanpah-Control Project  
**Attachments:** SCE Ivanpah Control-DEIR Comment Letter A.19-07-105\_5-15-2026.pdf

Hello John, Susan, and Susanne,

Please find attached the comments to the draft EIR for the Ivanpah Control 115kV project (Application No. A.19-07-015) for your review. We kindly ask that our comments be taken into consideration, and we greatly appreciate your time and attention to this matter. Please let us know if there are any questions or if additional clarification would be helpful.

Respectfully yours,

**Yvonne Dangsangtong (Nemeth)**  
**Regulatory Affairs Infrastructure Licensing Advisor**  
EcolQ Director of Communications  
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 **Call to Action: Embrace Carbon-Free Electricity for a Sustainable Future!**   
Edison's Sustainability Report 2024: <https://on.edison.com/sustainabilityreport>

May 15, 2026

**Email Only**

Mr. John Forsythe, CPUC Project Manager  
California Public Utilities Commission  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 967  
San Francisco, CA 94104-2920  
Via e-mail: [Ivanphah-Control@aspeneg.com](mailto:Ivanphah-Control@aspeneg.com)

**Subject: Southern California Edison's Comments on the Commission's Draft Environmental Impact Report for the Ivanpah-Control (I-C) 115kV Project (A. 19.07-015)**

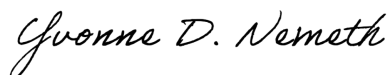
Dear Mr. Forsythe,

On behalf of Southern California Edison Company (SCE), we wish to thank the California Public Utilities Commission ("Commission" or "CPUC") for its work in preparing and publishing the Draft Environmental Impact Report for the Ivanpah-Control Project, State Clearinghouse No. 2020080553 (the "Draft EIR") and for allowing SCE the opportunity to provide comments on the Draft EIR.

SCE generally agrees with the analysis of the project and conclusions of the Draft EIR; however, SCE respectfully submits Attachment A, a matrix containing SCE's proposed revisions and rationale for the proposed changes to the Draft EIR. Suggested deletions from the Draft EIR are shown in ~~strikeout~~ format and suggested text additions are shown in underline format. To maintain consistency throughout the document, SCE asks that revisions be incorporated throughout the Final EIR as appropriate.

If you have any questions regarding these comments or would like to discuss any aspect in greater detail, please contact me at (951) 970-8375 and/or via e-mail: [Evie.Nemeth@sce.com](mailto:Evie.Nemeth@sce.com).

Sincerely,



Yvonne "Evie" Nemeth  
Regulatory Affairs Infrastructure Licensing Case Manager  
Southern California Edison

cc: Michelle Wilson, CPUC Program and Project Supervisor  
Susan Lee, Aspen Environmental Group, Executive Vice President  
Susanne Heim, Panorama Environmental, Inc., Principal  
Lori Charpentier, Southern California Edison, Infrastructure Licensing Sr. Manager  
Scott Lacy, Southern California Edison, Major Construction, Sr. Project Manager  
Marco Orozco, Southern California Edison, Major Construction Project Manager  
Lauren P. Goschke, Southern California Edison, Senior Attorney  
Alisa Krizek, Southern California Edison, Environmental Science Senior Manager

**ATTACHMENT A**

Draft Environmental Impact Report Comment Matrix

# Ivanpah-Control 115 kV TLRR Subtransmission Project

## DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

| Comment No. | Section  | Page | DEIR Original Language   | SCE Recommended Language  |
|-------------|----------|------|--|---|
| 1           | ES.1.1   | ES-1 | <p><b>EXECUTIVE SUMMARY</b><br/> <b>Introduction/Background</b><br/> <b>Project Application and Purpose</b><br/>                     ...<br/>                     The Proposed Project would require that some replacement structures be installed outside the existing corridor on which SCE has rights. In these locations, SCE would need to obtain new rights-of-way from the US Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Department of Defense (DOD), the California State Lands Commission (CSLC), the Los Angeles Department of Water and Power (LADWP), or private landowners.</p> | <p><b>Comment:</b> EIR should clarify that much of the alignment will deviate from the existing alignment, which will require the acquisition of new rights from multiple parties.</p> <p><b>Recommended Language:</b> “The Proposed Project <u>would install new structures in a new ROW along certain project segments. would require that some replacement structures be installed outside the existing corridor on which SCE has rights. In these locations,</u> SCE would need to obtain new rights-of-way from the US Bureau of Land Management (BLM), the Bureau of Indian Affairs (BIA), the Department of Defense (DOD), the California State Lands Commission (CSLC), the Los Angeles Department of Water and Power (LADWP), <u>and or private landowners for these areas.</u>”</p> |
| 2           | ES.2.1.1 | ES-4 | <p><b>Proposed Project Actions by Segment</b><br/>                     The corrective actions proposed by SCE within the 4 project segments are as follows:</p> <p>Segments 1 and 2 (174 miles): The TLRR Program identified a total of 1,681 spans 5 with discrepancies within Segment 1 and 335 spans within Segment 2. Replacement structures in these segments would be located in a new alignment approximately 50 feet east of the existing alignment.</p>   | <p><b>Comment:</b> Recommended edits clarify that the new alignment shifts to both the west and east of the existing alignment and the distance from the existing varies but will not exceed a maximum of 50 feet.</p> <p><b>Recommended Language:</b> “Segments 1 and 2 (174 miles): The TLRR Program identified a total of 1,681 spans 5 with discrepancies within Segment 1 and 335 spans within Segment 2. Replacement structures in these segments would be located in a new alignment <u>adjacent to the approximately 50 feet east of the existing alignment, no more than fifty (50) feet apart.</u>”</p>   |
| 3           | ES.5.1   | ES-8 | <p><b>Significant Environmental Effects of the Project that Cannot be Avoided</b></p> <ul style="list-style-type: none"> <li>▪ <b>Impact AE-2: Substantially damage scenic resources within a State scenic highway.</b></li> </ul> <p>...</p> <ul style="list-style-type: none"> <li>○ <b>Construction and Material Yards:</b> The 39-month proposed use of Material Yard 1-7, the introduced visual contrast and industrial character would create a significant and unavoidable impact on views within the designated scenic highway segment of US 395, about 11 miles south of the community of Big Pine.</li> </ul>    | <p><b>Comment:</b> SCE will voluntarily remove Material Yard 1-7 from consideration as a potential yard. This would eliminate this adverse effect. Therefore, SCE proposes removing this language from the DEIR.</p> <p><b>Recommended Language:</b> <del>The 39-month proposed use of Material Yard 1-7, the introduced visual contrast and industrial character would create a significant and unavoidable impact on views within the designated scenic highway segment of US 395, about 11 miles south of the community of Big Pine.</del></p>   |

**Ivanpah-Control 115 kV TLRR Subtransmission Project**

**DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS**

| Comment No. | Section | Page  | DEIR Original Language  | SCE Recommended Language  |
|-------------|---------|-------|---|---|
| 4           | ES.7.2  | ES-11 | <p>No Project Alternative</p> <p>Evaluated</p> <ul style="list-style-type: none"> <li>■ Objectives: Required by CEQA Guidelines Section 15126.6(e); would not meet project objectives</li> <li>■ Feasibility: Feasible, although SCE would be in violation of the mitigation plan agreed to with WECC</li> <li>■ Impacts: Modifications of the existing electrical system defined for the Proposed Project, and the associated impacts would not occur, but facility repair and replacement would be implemented on an as-needed basis</li> </ul> | <p><b>Comment:</b> SCE proposes revising this language to reflect the impacts of selecting the No Project Alternative.</p> <p><b>Recommended Language:</b></p> <ul style="list-style-type: none"> <li>• “Objectives: Required by CEQA Guidelines Section 15126.6(e); would not meet project objectives”.</li> <li>• “Feasibility: <u>Technically</u> feasible, although SCE would be in violation of the mitigation plan agreed to with WECC, <u>because clearance discrepancies would remain on SCE’s system for an extended period of time, resulting in non-compliance with CPUC and NERC requirements and guidance.</u>”</li> <li>• “Impacts: Modifications of the existing electrical system <u>as</u> defined for the Proposed Project and <del>the</del> <u>their</u> associated impacts would not occur, but facility repair and replacement <del>would</del> <u>may</u> be implemented on an as-needed basis over time <u>where permitted. Likely impacts to system reliability and deliverability due to continued use of aging infrastructure that cannot be utilized to their full capacity rating.</u>”</li> </ul> |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

## DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

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|-------------|---------|-------|--|---|
| 5           | ES.8.2  | ES-16 | <p><b>Comparison of No Project Alternative with Proposed Project</b></p> <p>Under the No Project Alternative, the specific modifications of the existing electrical system included in the proposed I-C Project would not occur and the existing lines would continue to operate in their current condition. SCE's PEA did not identify any other actions to shed light on "what would be reasonably expected to occur" in the absence of the Proposed Project. The range of predictable 'no project' consequences could include targeted repairs to address problems on a case-by-case basis or in response to emergencies arising from the continuing discrepancies of the existing facilities. If the Proposed Project is not approved by the CPUC, it is reasonable to assume that SCE could be required to implement targeted upgrades in response to emergency situations. These upgrades would likely be narrower in scope than those anticipated with the Proposed Project; however, mitigation measures identified for the Proposed Project, or the alternatives considered in this EIR, would not be adopted under the No Project Alternative.</p> | <p><b>Comment:</b> The No Project Alternative evaluates the consequences of not approving the I-C Project. Selecting the No Project Alternative means that SCE would neither remediate clearance discrepancies nor bring the lines into compliance with GO 95 and North American Electric Reliability Corporation (NERC) Facility Ratings. Additionally, it would mean that SCE would be out of compliance with the mitigation plan submitted to and agreed upon with WECC.</p> <p>Under this scenario, no construction or modifications to the existing electrical infrastructure would occur and all existing line clearance discrepancies would remain on SCE's system. Rather, SCE would address the line clearance discrepancies on an individual basis in an inefficient and disjointed manner, limited to activities permitted under SCE's existing land rights. Consequently, there would be impacts to system reliability and there would likely be ongoing frequent operations and maintenance work along the existing lines.</p> <p><b>Recommended Language:</b> "Under the No Project Alternative, the specific modifications of the existing electrical system included in the proposed I-C Project would not occur and the existing lines would continue to operate in their current condition. <del>SCE's PEA did not identify any other actions to shed light on "what would be reasonably expected to occur" in the absence of the Proposed Project.</del> The range of predictable 'no project' consequences could include targeted repairs to address problems on a case-by-case basis or in response to emergencies arising from the continuing discrepancies of the existing facilities, <u>but any such activities would be limited to activities permitted under SCE's existing land rights and would likely occur in an inefficient and disjointed manner.</u> If the Proposed Project is not approved by the CPUC, it is reasonable to assume that <u>one possible outcome might be that SCE could be required to would</u> implement targeted upgrades in response to emergency situations. These upgrades <del>would likely</del> <u>would likely</u> <del>could</del> <u>could</u> be significantly narrower in scope than those anticipated with the Proposed Project or possibly be on par with the Proposed Project, and require licensing. <del>however,</del> Mitigation measures identified for the Proposed Project, or the alternatives considered in this EIR, would not be adopted under the No Project Alternative."</p> |
| 6           | 1.1.1   | 1-4   | <p><b>Land Ownership and Right-of-Way Requirements</b></p> <p>...<br/>In some cases, SCE's existing ROWs on BLM-managed lands have expired and will be renegotiated if the Project is approved.</p>  | <p><b>Comment:</b> The entirety of the I-C project on BLM lands would require renegotiation of rights.</p> <p><b>Recommended Language:</b> "<del>In some cases, SCE's existing ROWs on BLM-managed lands have expired and will be renegotiated if the Project is</del> <u>for the portion of the approved project on BLM-managed lands.</u>"</p>  |
| 7           | 1.2.1   | 1-5   | <p><b>Objective 3: Meet I-C Project needs while minimizing environmental impacts.</b></p> <p>CEQA and the CEQA Guidelines (Title 14 of the California Code of Regulations, Section 15000, et seq.) require that an environmental impact report describe a reasonable range of alternatives to a proposed project, or the location of the proposed project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. CEQA Guidelines Section 15126.6(d) requires that sufficient information about each alternative be included to allow meaningful evaluation and analysis.</p>  | <p><b>Comment:</b> Include additional paragraph to close out the concepts identified in the first paragraph.</p> <p><b>Recommended Language: (Add 2<sup>nd</sup> paragraph):</b> "<u>Consistent with Section 15126.6 (d) of the CEQA Guidelines, this DEIR analyzes alternatives to the I-C Project. Section 4 Project Alternatives identifies and compares the construction and operation of the I-C Project with its alternatives, including alternatives that did not meet I-C Project objectives and were not carried forward.</u>"</p>   |

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|-------------|---------|------|---|--|
| 8           | 1.2.2   | 1-6  | <p><b>Review of SCE Project Objectives</b></p> <p>...</p> <p>SCE has stated it is committed to undertaking all reasonable efforts to correct discrepancies on the I-C Project 115 kV subtransmission lines prior to January 1, 2025.</p>  | <p><b>Comment:</b> SCE is committed to remediating GO 95 discrepancies along the I-C Project as soon as practicable to comply with CPUC GO 95 and NERC guidelines.</p> <p>SCE's 2010 Mitigation Plan submitted to WECC included an estimate that SCE would complete engineering and construction activities by 2025. However, due to the length of the licensing process, the timeline for remediating discrepancies has been extended. SCE provides semi- annual updates to WECC and quarterly updates to the CPUC Safety Enforcement Division on the status of the TLRR Project and continues to make best efforts to complete remediation activities within a reasonable timeframe.</p> <p><b>Recommended Language:</b> "SCE <del>has stated it</del> is committed to undertaking all reasonable efforts to correct discrepancies on the I-C Project 115 kV subtransmission lines <del>prior to January 1, 2025</del> <u>as soon as practicable.</u>"</p> |
| 9           | 1.3.1   | 1-7  | <p><b>Agency Use of this EIR</b></p> <p><b>CPUC Use of this EIR</b></p> <p>...</p> <p>After publication of the Final EIR, the ALJ will hold Evidentiary Hearings (if required) to cover issues of project cost and other considerations and will issue a Proposed Decision.</p>   | <p><b>Comment:</b> This is an Application for a Permit to Construct. Project cost is not an issue in a Permit to Construct Application. The language referring to project cost should be removed.</p> <p><b>Recommended language:</b> "After publication of the Final EIR, the ALJ will hold Evidentiary Hearings (if required) <del>to cover issues of project cost and other considerations</del> and will issue a Proposed Decision."</p>   |
| 10          | 2.1.1   | 2-3  | <p><b>Segment 3S: Kramer Substation to Tortilla Substation to Coolwater Substation.</b></p> <p>...</p> <p>The TLRR Program identified 1,681 spans with discrepancies within Segment 1 and 335 within Segment 2. Replacement structures in these segments would be located in a new alignment immediately adjacent to the existing alignment, approximately 50 feet to the east. The replacement of structures in a new alignment is necessary to provide continued service to Inyo, Kern, and San Bernardino Counties while the Project is being constructed.</p> | <p><b>Comment:</b> Changes reflect that the design has a varying distance separation, and that the new alignment varies from the east side to west side of existing, based on terrain and other variables.</p> <p><b>Recommended Language:</b> "The TLRR Program identified 1,681 spans with discrepancies within Segment 1 and 335 within Segment 2. Replacement structures in these segments would be located in a new alignment immediately adjacent to the existing alignment, <u>up to</u> approximately 50 feet <u>away to the east</u>. The replacement of structures in a new alignment is necessary to provide continued service to Inyo, Kern, and San Bernardino Counties while the Project is being constructed."</p>  |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

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|-------------|---------|------|---|---|
| 11          | 2.2.1   | 2-3  | <p><b>2.2. Project Components</b><br/> <b>Summary of Project Activities by Segment</b><br/>           ...</p> <ul style="list-style-type: none"> <li>▪ <b>Cal City Option</b></li> </ul> <p>...</p> <p>The Cal City Option would also require that approximately 20 structures at the southernmost end of Segment 2 be constructed as much as 30 feet taller than those currently proposed, because they would have to support an electric distribution line (called "Isner 33 kV"), and potentially a Frontier-owned telecommunication line, on the same structures, as an underbuild (i.e., lower on the structures than the 115 kV conductors).</p>  | <p><b>Comment:</b> Strike all references to relocation of the Isner 33kV circuit and Frontier-owned telecom line. This relocation would create additional disturbance as distribution and Frontier-owned telecommunication line would require shorter spans than the proposed 115kV collocation, resulting in additional structures.</p> <p>Please note a similar comment (#36) that was provided in response to the recent Cal City DEIR submitted on April 15, 2026: "SCE is in the process of engineering the collocation alternative presented by the CPUC. While the Project as described in Chapter 2 of the Draft EIR involves underbuilding the existing Isner 33 kV line on the proposed Kramer-Cal City 115 kV Subtransmission Line north of Kramer Substation, SCE notes that existing electrical and telecommunications facilities associated with the Isner 33 kV line would not be transferred to new facilities on the proposed Kramer-Cal City 115 kV Subtransmission Line under Alternative 1: Cal City/Ivanpah-Control Collocation or Alternative 3: Cal City/Ivanpah-Control Collocation with Twenty Mule Team Parkway Alternative. Adding distribution underbuild to this portion of the collocated Kramer-Cal City 115 kV Subtransmission Line under these alternatives would necessitate substantially taller structures and shorter span lengths, resulting in additional construction and environmental impacts as discussed in SCE's response to the CPUC's Data Request 19 for the SCE Ivanpah Control project (submitted on December 13, 2024, with follow up answers provided on February 7, 2025)."</p> <p><b>Recommended Language:</b> <del>The Cal City Option would also require that approximately 20 structures at the southernmost end of Segment 2 be constructed as much as 30 feet taller than those currently proposed, because they would have to support an electric distribution line (called "Isner 33 kV"), and potentially a Frontier-owned telecommunication line, on the same structures, as an underbuild (i.e., lower on the structures than the 115 kV conductors).</del></p> |
| 12          | 2.2.1   | 2-4  | <p><b>Southern Alignment Adjustment:</b> Under both the Cal City Option and the Cal City Sequoia Option, the alignment of the new structures could be located where proposed by SCE in the Cal City application, as opposed to the proposed I-C alignment. The north end of this adjustment would begin at a location approximately 4 miles north of the Kramer Substation at structure number 121346, and would continue south for approximately 3.5 miles, ending at approximately structure number 121371 at the south, affecting a total of approximately 26 structures. North of this adjustment area, after the lines cross under the existing 220 kV circuit, the alignment would return to the proposed I-C alignment. Under this adjusted alignment, the new double-circuit 115 kV structures would be located approximately 50 feet west of the locations currently defined for the Proposed Project in Segment 2. The structures would still be located east of the existing access road, so no new access road would be required. SCE expects that these adjusted structure locations would still be within the Structure Work Areas defined for the Proposed Project, so all ground disturbance calculations would be unchanged.</p> | <p><b>Comment:</b> As discussed below, please eliminate the references to the Cal City Sequoia Option as it was eliminated from analysis in the Cal City DEIR and creates unnecessary confusion in the I-C DEIR. and please provide flexibility for final I-C alignment based on final engineering and current site conditions.</p> <p><b>Recommended Language:</b> Under both the Cal City Option and the Cal City Sequoia Option, the alignment of the new structures could be located <u>closer to</u> where proposed by SCE in the Cal City application, as opposed to the proposed I-C alignment. The north end of this adjustment would begin at a location approximately 4 miles north of the Kramer Substation at structure number 121346, and would continue south for approximately 3.5 miles, ending at approximately structure number <u>121370</u> <del>121371</del> at the south, affecting a total of approximately <u>25</u> <del>26</del> structures. North of this adjustment area, after the lines cross under the existing 220 kV circuit, the alignment would return to the proposed I-C alignment. Under this adjusted alignment, the new double-circuit 115 kV structures <u>could</u> <del>would</del> be located approximately 50 feet west of the locations currently defined for the Proposed Project in Segment 2. The structures would still be located east of the existing access road, so no new access road would be required. SCE expects that these adjusted structure locations would still be within the Structure Work Areas defined for the Proposed Project, so all ground disturbance calculations would be unchanged."</p>  |

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|-------------|---------|------|--|--|
| 13          | 2.2.1   | 2-4  | <ul style="list-style-type: none"> <li>▪ <b>Cal City Sequoia Option:</b> In this option, the additional 115 kV circuit would join the I-C ROW about 7.5 miles north of Kramer Substation (at the intersection of Sequoia Boulevard and US 395) and would be installed from that point south into the Kramer Substation. The range of structure heights would be the same as that described for the Cal City Option.</li> </ul> | <p><b>Comment:</b> SCE suggests striking the entire reference to the “Sequoia Option” as it was eliminated from analysis in the Cal City DEIR and creates unnecessary confusion in the I-C DEIR.</p> <p><b>Recommended Language:</b> <del>Cal City Sequoia Option: In this option, the additional 115 kV circuit would join the I-C ROW about 7.5 miles north of Kramer Substation (at the intersection of Sequoia Boulevard and US 395) and would be installed from that point south into the Kramer Substation. The range of structure heights would be the same as that described for the Cal City Option.</del></p>  |
| 14          | 2.2.1   | 2-4  | <ul style="list-style-type: none"> <li>▪ <b>Southern Alignment Adjustment:</b> Under both the Cal City Option and the Cal City Sequoia Option, the alignment of the new structures could be located where proposed by SCE in the Cal City application, as opposed to the proposed I-C alignment.</li> </ul>  | <p><b>Comment:</b> SCE suggests striking the entire reference to the “Sequoia Option” as it was eliminated from analysis in the Cal City DEIR and creates unnecessary confusion in the I-C DEIR.</p> <p><b>Recommended Language:</b> “Under both the Cal City Option and the Cal City Sequoia Option, the alignment of the new structures could be located where proposed by SCE in the Cal City application, as opposed to the proposed I-C alignment.”</p>   |
| 15          | 2.2.5.3 | 2-9  | <p><b>Segments 3N and 3S ROW Requirements</b></p> <p>...<br/>Railroad crossings will occur as follows:</p> <ul style="list-style-type: none"> <li>▪ Segment 2 would have two crossings (one at Garlock Road just north of Randsburg; one at Highway 58 and Highway 395 at Kramer Junction.</li> <li>▪ Segment 3N would have multiple crossings located at the Barstow rail switchyard located just west of Barstow.</li> </ul> | <p><b>Comment:</b> Both Segments 3N and 3S would cross the active rail lines. SCE requests to correct language on Segment 3N and add language indicating additional railroad crossings are expected in Segment 3S.</p> <p><b>Recommended Language:</b><br/>“Railroad crossings will occur as follows:</p> <ul style="list-style-type: none"> <li>▪ Segment 3N would have multiple crossings, <del>located at the Barstow rail switchyard located just west of Barstow</del> one <u>located</u> immediately west of Coolwater Substation <u>and another crossing at Highway 58 and Highway 395 at Kramer Junction.</u></li> <li>▪ <u>Segment 3S would have multiple crossings, including five crossings located at the Barstow Rail Yard and two crossings immediately south of Coolwater Substation.</u>”</li> </ul> |
| 16          | 2.2.5.3 | 2-9  | <p><b>Segments 3N and 3S ROW Requirements</b></p> <p>...<br/>...Due to the age of the lines, the original language of the easement rights may not properly capture the details related to the new and upgraded facilities being installed (e.g., communications circuits within the OPGW).</p>   | <p><b>Comment:</b> SCE is not installing OPGW in either 3N or 3S, therefore SCE suggests striking the statement regarding existing easement rights.</p> <p><b>Recommended Language:</b> <del>Due to the age of the lines, the original language of the easement rights may not properly capture the details related to the new and upgraded facilities being installed (e.g., communications circuits within the OPGW).</del></p>  |

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|-------------|----------|------|---|---|
| 17          | 2.4.1    | 2-10 | <p><b>Construction Features Common to All Project Components</b></p> <p>... Neither the Cal City Option, the Cal City Sequoia Option, nor the Southern Alignment Adjustment would require adjustments to the total amounts of construction disturbance areas.</p>   | <p><b>Comment:</b> SCE suggests striking the entire reference to the “Sequoia Option” as it was eliminated from analysis in the Cal City DEIR and creates unnecessary confusion in the I-C DEIR.</p> <p><b>Recommended Language:</b> “Neither the Cal City Option <del>the Cal City Sequoia Option</del> nor the Southern Alignment Adjustment would require adjustments to the total amounts of construction disturbance areas.”</p>   |
| 18          | 2.4.1.2  | 2-13 | <p><b>Work Areas</b></p> <p>... The graded area would be compacted to at least 90 percent relative density and would be capable of supporting heavy vehicular traffic.</p>  | <p><b>Comment:</b> While staging areas and construction work areas could require minor grading to provide a reasonably level work surface for equipment and vehicle use, only work areas that require cut and fill would be compacted to at least 90 percent relative density. Currently, no grading to this extent is expected for the project overall.</p> <p><b>Recommended Language:</b> “The graded area would be compacted to <del>at least 90 percent relative density and would</del> be capable of supporting heavy vehicular traffic.”</p>  |
| 19          | 2.4.1.12 | 2-16 | <p><b>Geotechnical Studies</b></p> <p>... The results of these studies would provide an evaluation of the depth to the water table, liquefaction potential, physical properties of subsurface soils, slope stability, and the presence of hazardous materials and common contaminants; the studies may also include recommendations for the final engineering design.</p>   | <p><b>Comment:</b> SCE suggests adding language to address structures located near on active faults.</p> <p><b>Recommended Language:</b> “The results of these studies would provide an evaluation of the depth to the water table, liquefaction potential, physical properties of subsurface soils, slope stability, and the presence of hazardous materials and common contaminants; the studies may also include recommendations for the final engineering design <u>and potential measures to reduce the potential for damage due to fault rupture for structures located within the Alquist-Priolo zones or structures that will span Alquist-Priolo zones.</u>”</p>   |
| 20          | 2.4.2.3  | 2-19 | <p><b>Notifications Prior to Drilling and Excavation Activities</b></p> <p>Prior to drilling for foundations, SCE or its Contractor would contact Underground Service Alert (USA) to identify any existing underground utilities in the construction zone. Construction of foundations and other below-ground components of the Project would begin with the survey of existing underground utilities along the proposed underground and excavation locations. SCE would notify all applicable utilities via USA to locate and mark existing utilities and conduct exploratory excavations (potholing) as necessary to verify the location of existing utilities. SCE would apply for and obtain ministerial encroachment permits for trenching in public streets, as required.</p> | <p><b>Comment:</b> General Order 131-E explains that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to the Commission's Jurisdiction. Therefore, if a local jurisdiction includes local discretionary requirements in ministerial permits, then SCE would not be required to obtain those permits. SCE proposes adding the word “applicable” to clarify which ministerial permits SCE would obtain.</p> <p><b>Recommended Language:</b> “Notifications Prior to Drilling and Excavation Activities Prior to drilling for foundations, SCE or its Contractor would contact Underground Service Alert (USA) to identify any existing underground utilities in the construction zone. Construction of foundations and other below-ground components of the Project would begin with the survey of existing underground utilities along the proposed underground and excavation locations. SCE would notify all applicable utilities via USA to locate and mark existing utilities and conduct exploratory excavations (potholing) as necessary to verify the location of existing utilities. SCE would apply for and obtain <u>applicable</u> ministerial encroachment permits for trenching in public streets, as required.”</p> |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

## DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

| Comment No.                        | Section                       | Page                   | DEIR Original Language  | SCE Recommended Language  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
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| 21                                 | 2.4.10                        | 2-41                   | <p><b>Table 2-12 Construction Schedule:</b></p> <p><b>Table 2-12. Proposed Construction Schedule</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Project Activity</th> <th style="text-align: center;">Approximate Duration (months)</th> <th style="text-align: center;">Approximate Start Date</th> </tr> </thead> <tbody> <tr> <td>PTC Application Submitted</td> <td style="text-align: center;">---</td> <td style="text-align: center;">July 2019</td> </tr> <tr> <td>Amended PTC Application</td> <td style="text-align: center;">22</td> <td style="text-align: center;">April 2020</td> </tr> <tr> <td>Second Amended PTC Application</td> <td style="text-align: center;">---</td> <td style="text-align: center;">October 2024</td> </tr> <tr> <td>Acquisition of Required Permits</td> <td style="text-align: center;">16</td> <td style="text-align: center;">October 2026</td> </tr> <tr> <td>Right-of-Way/ Property Acquisition</td> <td style="text-align: center;">18</td> <td style="text-align: center;">June 2026</td> </tr> <tr> <td>Final Engineering</td> <td style="text-align: center;">8</td> <td style="text-align: center;">December 2026</td> </tr> <tr> <td>Subtransmission Line Construction</td> <td style="text-align: center;">39</td> <td style="text-align: center;">April 2027</td> </tr> <tr> <td>Cleanup</td> <td style="text-align: center;">8</td> <td style="text-align: center;">February 2030</td> </tr> <tr> <td><b>Project Operational</b></td> <td style="text-align: center;">---</td> <td style="text-align: center;"><b>October 2030</b></td> </tr> </tbody> </table> <p><small>Source: SCE, PEA Table 3.7-10 (SCE, 2020); updated with SCE DR-7 (9/30/24).</small></p> | Project Activity  | Approximate Duration (months) | Approximate Start Date | PTC Application Submitted | --- | July 2019 | Amended PTC Application | 22 | April 2020 | Second Amended PTC Application | --- | October 2024 | Acquisition of Required Permits | 16 | October 2026 | Right-of-Way/ Property Acquisition | 18 | June 2026 | Final Engineering | 8 | December 2026 | Subtransmission Line Construction | 39 | April 2027 | Cleanup | 8 | February 2030 | <b>Project Operational</b> | --- | <b>October 2030</b> | <p><b>Comment:</b> Updated dates are provided based on currently known project schedule.</p> <p><b>Recommended Update:</b></p> <p><b>Table 2-12. Proposed Construction Schedule</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Project Activity</th> <th style="text-align: center;">Approximate Duration (months)</th> <th style="text-align: center;">Approximate Start Date</th> </tr> </thead> <tbody> <tr> <td>PTC Application Submitted</td> <td style="text-align: center;">---</td> <td style="text-align: center;">July 2019</td> </tr> <tr> <td>Amended PTC Application</td> <td style="text-align: center;">22</td> <td style="text-align: center;">April 2020</td> </tr> <tr> <td>Second Amended PTC Application</td> <td style="text-align: center;">---</td> <td style="text-align: center;">October 2024</td> </tr> <tr> <td>Acquisition of Required Permits</td> <td style="text-align: center;">13</td> <td style="text-align: center;">December 2026</td> </tr> <tr> <td>Right-of-Way/ Property Acquisition</td> <td style="text-align: center;">18</td> <td style="text-align: center;">October 2027</td> </tr> <tr> <td>Final Engineering</td> <td style="text-align: center;">8</td> <td style="text-align: center;">April 2028</td> </tr> <tr> <td>Subtransmission Line Construction</td> <td style="text-align: center;">39</td> <td style="text-align: center;">August 2028</td> </tr> <tr> <td>Cleanup</td> <td style="text-align: center;">8</td> <td style="text-align: center;">September 2031</td> </tr> <tr> <td><b>Project Operational</b></td> <td style="text-align: center;">---</td> <td style="text-align: center;"><b>May 2032</b></td> </tr> </tbody> </table> <p><small>Source: SCE, PEA Table 3.7-10 (SCE, 2020); updated with SCE DR-7 (9/30/24).</small></p> | Project Activity | Approximate Duration (months) | Approximate Start Date | PTC Application Submitted | --- | July 2019 | Amended PTC Application | 22 | April 2020 | Second Amended PTC Application | --- | October 2024 | Acquisition of Required Permits | 13 | December 2026 | Right-of-Way/ Property Acquisition | 18 | October 2027 | Final Engineering | 8 | April 2028 | Subtransmission Line Construction | 39 | August 2028 | Cleanup | 8 | September 2031 | <b>Project Operational</b> | --- | <b>May 2032</b> |
| Project Activity                   | Approximate Duration (months) | Approximate Start Date |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| PTC Application Submitted          | ---                           | July 2019              |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Amended PTC Application            | 22                            | April 2020             |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Second Amended PTC Application     | ---                           | October 2024           |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Acquisition of Required Permits    | 16                            | October 2026           |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Right-of-Way/ Property Acquisition | 18                            | June 2026              |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Final Engineering                  | 8                             | December 2026          |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Subtransmission Line Construction  | 39                            | April 2027             |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Cleanup                            | 8                             | February 2030          |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| <b>Project Operational</b>         | ---                           | <b>October 2030</b>    |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Project Activity                   | Approximate Duration (months) | Approximate Start Date |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| PTC Application Submitted          | ---                           | July 2019              |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Amended PTC Application            | 22                            | April 2020             |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Second Amended PTC Application     | ---                           | October 2024           |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Acquisition of Required Permits    | 13                            | December 2026          |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Right-of-Way/ Property Acquisition | 18                            | October 2027           |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Final Engineering                  | 8                             | April 2028             |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Subtransmission Line Construction  | 39                            | August 2028            |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| Cleanup                            | 8                             | September 2031         |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| <b>Project Operational</b>         | ---                           | <b>May 2032</b>        |   |   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| 22                                 | 2.8.1                         | 2-47                   | <p><b>APM WEAP Worker’s Environmental Awareness Training Program.</b> All activities, as determined appropriate on an activity-by-activity basis, will implement a worker education program that meets the approval of the BLM. The program will be carried out during all phases of the project (site mobilization, ground disturbance, grading, construction, operation, closure/decommissioning or project abandonment, and restoration/reclamation activities).</p>   | <p><b>Comment:</b> SCE’s APM was revised to the language identified at left. SCE recommends reverting to the original proposed language by removing the language below. The WEAP for work on BLM-managed lands will be specific to BLM requirements and will not apply project-wide, because additional work will occur on private lands.</p> <p><b>Recommended Language:</b> “All activities, as determined appropriate on an activity-by-activity basis, will implement a worker education program that meets the approval of the BLM.”</p>   |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |
| 23                                 | 2.8.2                         | 2-47                   | <p><b>Air Quality</b></p> <p><b>APM AIR-1 Tier 4 Construction Equipment.</b> All construction equipment with rating between 100 and 750 horsepower (hp) will be required to use engines compliant with U.S. EPA Tier 4 non-road engine standards. In the event a Tier 4 engine is not available for any off-road construction equipment with rating at or higher than 100 hp, documentation of the unavailability will be provided.</p>   | <p><b>Comment:</b> SCE’s APM was revised to the language identified at left. SCE recommends reverting to the original proposed language.</p> <p><b>Recommended Language:</b> “All construction equipment with rating between 100 and 750 horsepower (hp) would be required to use engines compliant with U.S. EPA Tier 4 non-road engine standards. In the event a Tier 4 engine is not available for any off-road construction equipment with rating at or higher than 100 hp, <u>that engine would be equipped with a Tier 3 engine and</u> documentation of the unavailability would be provided.”</p> |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |              |                                    |    |           |                   |   |               |                                   |    |            |         |   |               |                            |     |                     |   |                  |                               |                        |                           |     |           |                         |    |            |                                |     |              |                                 |    |               |                                    |    |              |                   |   |            |                                   |    |             |         |   |                |                            |     |                 |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

## DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

| Comment No. | Section | Page | DEIR Original Language  | SCE Recommended Language   |
|-------------|---------|------|---|--|
| 24          | 2.8.4   | 2-54 | <p><b>APM BIO-HERP-1 Desert Tortoise</b></p> <p>...</p> <ul style="list-style-type: none"> <li>▪ <b>Vehicle Travel.</b> Vehicular traffic will not exceed 15 miles per hour within the areas not cleared by protocol level surveys where desert tortoise may be impacted.</li> </ul>  | <p><b>Comment:</b> SCE's APM was revised to the language identified at left. SCE recommends reverting to the original proposed language.</p> <p><b>Recommended Language: APM BIO-HERP-1 Desert Tortoise</b></p> <p><u>"Vehicular traffic will not exceed 15 miles per hour within the areas not cleared by protocol level surveys where desert tortoise may be impacted. During construction-related activities, motor vehicles will be limited to maintained roads, designated routes, and areas identified as being permanently or temporarily affected by construction within the Project footprint. Motor vehicle speeds along Project routes and access roads within habitat for desert tortoise (as described in the TLRR Habitat and Sensitive Species Reports for Control-Haiwee and Ivanpah-Coolwater-Kramer-Inyokern) will not exceed 20 miles per hour."</u></p>  |
| 25          | 2.8.4   | 2-54 | <p><b>APM BIO-HERP-1 Desert Tortoise</b></p> <p>...</p> <ul style="list-style-type: none"> <li>▪ <b>Under Vehicle Checks.</b> Desert tortoises commonly seek shade during the hottest times of the day. Employees working within the geographic range of this species will be required to check under their equipment or vehicles before they are moved. If desert tortoises are encountered, the vehicle will not be moved until the tortoise has either voluntarily moved away from the equipment or vehicle.</li> </ul>  | <p><b>Comment:</b> SCE's APM was revised to the language identified at left. SCE recommends reverting to the original language of SCE's APM. SCE's APM is consistent with the language in MM BIO-1i</p> <p><b>Recommended Language:</b> "Desert tortoises commonly seek shade during the hottest times of the day. Employees working within the geographic range of this species will be required to check under their equipment or vehicles before they are moved. If desert tortoises are encountered, the vehicle will not be moved until the tortoise has either voluntarily moved away from the equipment or vehicle <u>or is moved by an agency-approved biologist.</u>"</p>   |
| 26          | 2.8.4   | 2-58 | <p><b>APM BIO-MAM-6 Bats, common and sensitive species</b></p> <p>...</p> <p>If no roosts (maternity, wintering, or otherwise) are present, tree trimming/removal may continue as planned. If an active roost has been identified or lasiurine bats are present, removal of trees around the roost would be conducted between September 15 - October 30, and February 15 - April 15, which corresponds to time periods when bats are active, not in torpor, and not caring for non-mobile young.</p> <p>Removal of trees requires the following two-step process prior to trimming/removal:</p> <ul style="list-style-type: none"> <li>▪ On Day 1 under the supervision of a qualified bat biologist, Step 1 would include branches and limbs with no cavities removed by hand (e.g., using chainsaws). This would create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree would either abandon the roost immediately (rarely) or, after emergence, would avoid returning to the roost.</li> <li>▪ On Day 2, Step 2 of the tree removal may occur, which would be removal of the remainder of the tree. Trees that are only to be trimmed and not removed would be processed in the same manner; if a branch with a potential roost must be removed, all surrounding branches would be trimmed on Day 1 under supervision of a qualified bat biologist and then the limb with the potential roost would be removed on Day 2.</li> </ul> | <p><b>Comment:</b> SCE's APM was revised to include the language identified at left. SCE recommends reverting to the original proposed language by removing the added language as it was not included in SCE's proposed APM.</p> <p><b>Recommended Language:</b></p> <p><del>If no roosts (maternity, wintering, or otherwise) are present, tree trimming/removal may continue as planned. If an active roost has been identified or lasiurine bats are present, removal of trees around the roost would be conducted between September 15 - October 30, and February 15 - April 15, which corresponds to time periods when bats are active, not in torpor, and not caring for non-mobile young.</del></p> <p><del>Removal of trees requires the following two-step process prior to trimming/removal:</del></p> <ul style="list-style-type: none"> <li><del>• On Day 1 under the supervision of a qualified bat biologist, Step 1 would include branches and limbs with no cavities removed by hand (e.g., using chainsaws). This would create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree would either abandon the roost immediately (rarely) or, after emergence, would avoid returning to the roost.</del></li> <li><del>• On Day 2, Step 2 of the tree removal may occur, which would be removal of the remainder of the tree. Trees that are only to be trimmed and not removed would be processed in the same manner; if a branch with a potential roost must be removed, all surrounding branches would be trimmed on Day 1 under supervision of a qualified bat biologist and then the limb with the potential roost would be removed on Day 2.</del></li> </ul> |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

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| Comment No. | Section             | Page                | DEIR Original Language  | SCE Recommended Language  |
|-------------|---------------------|---------------------|---|---|
| 27          | 2.8.4<br>And<br>7.7 | 2-59<br>And<br>7-16 | <p><b>APM BIO-RES-1 Develop and Implement Habitat Restoration Plan (HRP).</b></p> <p>...<br/>If an unforeseen catastrophic event (e.g., flood, fire, or other event beyond SCE control) damages a restoration site within the monitoring period, SCE will assess adjacent areas and adjust success standards accordingly in coordination with the agencies.<br/>...</p> | <p><b>Comment:</b> SCE's APM was revised to the language identified at left. SCE recommends reverting to the original language of SCE's APM. SCE's original language allows for restoration for singular catastrophic incidents beyond SCE's control, however SCE should not be subject to indefinitely restoring the site due to catastrophic events beyond SCE control.</p> <p><b>Recommended Language:</b></p> <p><b>APM BIO-RES-1-Develop and Implement Habitat Restoration Plan (HRP).</b></p> <p><del>"If an unforeseen catastrophic event (e.g., flood, fire, or other event beyond SCE control) damages a restoration site within the monitoring period, SCE will assess adjacent areas and adjust success standards accordingly in coordination with the agencies.</del></p> <p><u>For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages the area within the monitoring period, SCE will restore to conditions similar to adjacent impacted areas. If a second event occurs, no replacement is required."</u></p> |

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| 28          | 3.2.3.3. | 3.2-25 | <p><b>Construction and/or Material Yards.</b> SIGNIFICANT AND UNAVOIDABLE. Three construction/contractor yards are proposed to be located within the foreground of views from the Officially Designated Scenic Highway segment of US 395. These yards are defined as numbers 1-4, 1-6, and 1-7 (see Table 2-3, Chapter 2) and mapped on Figure 2-6b through Figure 2-6d (Material Yards Segment 1) in Chapter 2.</p> <p>Section 2.4.9.1 describes the construction process for Segment 1 of the Proposed Project. Due to the construction phasing requirement that the Segment 1 Project components first be fully constructed, and subsequently the existing Project structures would be removed, followed by a cleanup phase. SCE states that that the yards in Segment 1 would be occupied for approximately 39 months (SCE Response to Data Request 18-4), given the project schedule. As described in Chapter 2, the new line would be fully constructed and energized before SCE decommissions and removes the existing line. In response to Data Request 18-4, SCE stated that Material Yards 1-4 and 1-5 could be removed with minimal impact to construction. However, SCE will require the use Material Yard 1-7, an approximately 5-acre site located about 400 feet east of US 395 on the north side of Aberdeen Station Road (about 13 miles south of the community of Big Pine). SCE further stated that there are no suitable replacement yards for this segment of the Project.</p> <p>Given the 39-month proposed use of Material Yard 1-7, the introduced visual contrast and industrial character would create a significant impact on views from the scenic highway.</p> | <p><b>Comment:</b> SCE will voluntarily remove Material Yard 1-7 from consideration as a potential yard. This would eliminate this adverse effect. Therefore, SCE proposes removing this language from the DEIR and revising the significance determination. SCE also recommends revising Table 2-3 and Figures 2-6b through Figure 2-6d to remove Material Yards 1-4 , 1-5, 1-6 and 1-7.</p> <p><b>Recommended Language:</b></p> <p><del>“Construction and/or Material Yards. SIGNIFICANT AND UNAVOIDABLE. NO IMPACT. Three</del> <u>Two</u> construction/contractor yards are proposed to be located within the foreground of views from the Officially Designated Scenic Highway segment of US 395. These yards are defined as numbers 1-4, <del>and 1-6, and 1-7</del> (see Table 2-3, Chapter 2) and mapped on Figure 2-6b through Figure 2-6d (Material Yards Segment 1) in Chapter 2.</p> <p>Section 2.4.9.1 describes the construction process for Segment 1 of the Proposed Project. Due to the construction phasing requirement that the Segment 1 Project components first be fully constructed, and subsequently the existing Project structures would be removed, followed by a cleanup phase. SCE states that that the yards in Segment 1 would be occupied for approximately 39 months (SCE Response to Data Request 18-4), given the project schedule. As described in Chapter 2, the new line would be fully constructed and energized before SCE decommissions and removes the existing line. In response to Data Request 18-4, SCE stated that Material Yard <u>1-5</u> was removed from consideration and that Material Yards 1-4 and 1-<del>5</del><u>6</u> could be removed with minimal impact to construction. <del>However, SCE will require the use Material Yard 1-7, an approximately 5-acre site located about 400 feet east of US 395 on the north side of Aberdeen Station Road (about 13 miles south of the community of Big Pine). SCE further stated that there are no suitable replacement yards for this segment of the Project.</del></p> <p><del>Given the 39-month proposed use of Material Yard 1-7, the introduced visual contrast and industrial character would create a significant impact on views from the scenic highway.</del></p> <p><u>Therefore, because SCE proposes no material yards within the Officially Designated Scenic Highway segment of US 395, there will be no impacts associated with SCE’s material yards.”</u></p> |
| 29          | 3.4.1.4  | 3.4-3  | <p><b>Toxic Air Contaminants</b></p> <p>...</p> <p>The Proposed Project would not be considered a stationary source subject to risk assessment programs, and surveys will be necessary to determine whether demolition or renovation work at the substations could encounter asbestos.</p>   | <p><b>Comment:</b> No demolition or renovation work is needed as part of the I-C Project, therefore SCE recommends removing this language from the DEIR.</p> <p><b>Recommended Language:</b> <del>“The Proposed Project would not be considered a stationary source subject to risk assessment programs, and surveys will be necessary to determine whether demolition or renovation work at the substations could encounter asbestos.”</del></p>   |

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| 30          | 3.4.3.3 | 3.4-10 | <p><b>Construction</b><br/> <i>LESS THAN SIGNIFICANT WITH MITIGATION.</i> The Proposed Project would create criteria air pollutant emissions during construction activities, and these activities would occur over four project segments in the jurisdiction of three different local air districts. This section quantifies the criteria air pollutant emissions within each local air district to compare with the significance thresholds for protecting regional air quality planning efforts. Construction-phase emissions would include tailpipe emissions from motor gasoline or diesel construction equipment and vehicles used to transport employees, equipment, or haul materials. Other emissions from construction include fugitive dust emissions from ground disturbance on unpaved and paved surfaces via grading, vehicle and equipment movement, and losses while hauling loose material from or to the site.</p> <p>...</p> <p>Tables 3.4-7 and 3.4-8 show maximum annual and daily average emissions in GBUAPCD and EKAPCD with the applicant proposed measure to require use of higher-tier construction equipment and the applicant's compliance with mandatory dust control measures. Neither the annual nor daily emissions in either air district would be in exceedance of the local thresholds. Impacts in GBUAPCD and EKAPCD are less than significant with mitigation.</p> | <p><b>Comment:</b> The DEIR states that Mitigation Measure AQ-2a (Control Off Road Equipment Emissions with Tier 4 Engines) supersedes APM AQ-1 <i>“in order to provide documentation of engine ratings onsite during construction. With the recommended mitigation, the impact of construction phase emissions would be reduced to a less than significant level in all three air districts.”</i></p> <p>CEQA states that mitigation measures are appropriate when the mitigation measure reduces a significant environmental impact. CEQA Guidelines § 15126.4(a)(3). Mitigation measure AQ-2a adds a reporting requirement to SCE's APM. Reporting requirements do not mitigate air quality impacts. Therefore SCE proposes removing Mitigation Measure AQ-2a and revising the impacts analysis to reflect that the impact is less than significant with the implementation of APM AQ-1. SCE recommends this change be made throughout the DEIR, where applicable.</p> <p><b>Recommended Language:</b> “Tables 3.4-7 and 3.4-8 show maximum annual and daily average emissions in GBUAPCD and EKAPCD with the applicant proposed measure to require use of higher-tier construction equipment and the applicant's compliance with mandatory dust control measures. Neither the annual nor daily emissions in either air district would be in exceedance of the local thresholds. Impacts in GBUAPCD and EKAPCD are less than significant with mitigation.”</p> |

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|---------------------------------|--|----------------------|--|---|---------------------|---------------------------------|--|----------|----------------|-------------------------------|--|------------------------|---|--------------------|------|--------|-----------------------------|---|
| 31                              | 3.4.3.3<br>&<br>3.8  | 3.4-11<br>&<br>3.8-8 | <p><b>Impacts and Mitigation Measures</b></p> <p>...</p> <p>Emissions quantified in this analysis reflect implementation of the proposed mitigation measures that supersede the applicant proposed measures, and comply with air district regulations, which would require use of Tier 4 engines and dust control measures. The impact of construction emissions would be significant without implementation of these measures. To ensure that the Applicant Proposed Measures will be made enforceable, this analysis recommends Mitigation Measure AQ-2a, Control Off-Road Equipment Emissions with Tier 4 Engines, and Mitigation Measure AQ-2b, Control Fugitive Dust Emissions. Mitigation Measure AQ-2a (Control Off Road Equipment Emissions with Tier 4 Engines) supersedes APM AQ-1 in order to provide documentation of engine ratings onsite during construction. With the recommended mitigation, the impact of construction phase emissions would be reduced to a less than significant level in all three air districts.</p> <p><b>Mitigation Measures for Impact AQ-2 AQ-2a Control Off-Road Equipment Emissions with Tier 4 Engines (Supersedes APM AQ-1).</b></p> <p><b>3.8.4. Mitigation Monitoring, Compliance, and Reporting</b></p> <p>Table 3.8- presents the mitigation monitoring, compliance, and reporting information for air quality.</p> <p><b>Table 3.8-5. Mitigation Monitoring Program – Air Quality</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Mitigation Component</th> <th style="text-align: left;">Text or Description</th> </tr> </thead> <tbody> <tr> <td><b>Mitigation Measure AQ-2a</b></td> <td><b>Control Off-Road Equipment Emissions with Tier 4 Engines (Supersedes APM AQ-1).</b></td> </tr> <tr> <td>Location</td> <td>Entire Project</td> </tr> <tr> <td>Monitoring / Reporting Action</td> <td>CPUC to verify that SCE uses required engine types</td> </tr> <tr> <td>Effectiveness Criteria</td> <td>Emissions are reduced based on use of cleaner engines</td> </tr> <tr> <td>Responsible Agency</td> <td>CPUC</td> </tr> <tr> <td>Timing</td> <td>Ongoing during construction</td> </tr> </tbody> </table> | Mitigation Component  | Text or Description | <b>Mitigation Measure AQ-2a</b> | <b>Control Off-Road Equipment Emissions with Tier 4 Engines (Supersedes APM AQ-1).</b> | Location | Entire Project | Monitoring / Reporting Action | CPUC to verify that SCE uses required engine types | Effectiveness Criteria | Emissions are reduced based on use of cleaner engines | Responsible Agency | CPUC | Timing | Ongoing during construction | <p><b>Comment:</b></p> <p>The DEIR states that Mitigation Measure AQ-2a (Control Off Road Equipment Emissions with Tier 4 Engines) supersedes APM AQ-1 “in order to provide documentation of engine ratings onsite during construction. With the recommended mitigation, the impact of construction phase emissions would be reduced to a less than significant level in all three air districts.”</p> <p>CEQA states that mitigation measures are appropriate when the mitigation measure reduces a significant environmental impact. CEQA Guidelines § 15126.4(a)(3). Mitigation measure AQ-2a adds a reporting requirement to SCE’s APM. Reporting requirements do not mitigate air quality impacts. Therefore, SCE proposes removing Mitigation Measure AQ-2a and revising the impacts analysis to reflect that the impact is less than significant with the implementation of APM AQ-1.</p> <p><b>Recommended Language:</b></p> <p>“Emissions quantified in this analysis reflect implementation of the <del>proposed mitigation measures that supersede the applicant proposed measures,</del> and comply with air district regulations, which would require use of Tier 4 engines and dust control measures. The impact of construction emissions would be significant without implementation of <del>these</del> <u>this</u> measures. <del>To ensure that the Applicant Proposed Measures will be made enforceable, this analysis recommends Mitigation Measure AQ-2a, Control Off-Road Equipment Emissions with Tier 4 Engines, and Mitigation Measure AQ-2b, Control Fugitive Dust Emissions. Mitigation Measure AQ-2a (Control Off Road Equipment Emissions with Tier 4 Engines) supersedes APM AQ-1 in order to provide documentation of engine ratings onsite during construction. With the recommended mitigation, the impact of construction phase emissions would be reduced to a less than significant level in all three air districts”</del>”</p> |
| Mitigation Component            | Text or Description  |                      |  |   |                     |                                 |  |          |                |                               |  |                        |   |                    |      |        |                             |   |
| <b>Mitigation Measure AQ-2a</b> | <b>Control Off-Road Equipment Emissions with Tier 4 Engines (Supersedes APM AQ-1).</b>                                       |                      |  |   |                     |                                 |  |          |                |                               |  |                        |   |                    |      |        |                             |   |
| Location                        | Entire Project   |                      |  |   |                     |                                 |  |          |                |                               |  |                        |   |                    |      |        |                             |   |
| Monitoring / Reporting Action   | CPUC to verify that SCE uses required engine types   |                      |  |   |                     |                                 |  |          |                |                               |  |                        |   |                    |      |        |                             |   |
| Effectiveness Criteria          | Emissions are reduced based on use of cleaner engines  |                      |  |   |                     |                                 |  |          |                |                               |  |                        |   |                    |      |        |                             |   |
| Responsible Agency              | CPUC   |                      |  |   |                     |                                 |  |          |                |                               |  |                        |   |                    |      |        |                             |   |
| Timing                          | Ongoing during construction  |                      |  |   |                     |                                 |  |          |                |                               |  |                        |   |                    |      |        |                             |   |
| 32                              | 3.5.1.1<br>&<br>Appendix 4<br>Biological Resources<br>Table 4-1.<br>Special-status<br>Species Potential<br>for<br>Occurrence | 3.5-5<br>&<br>4-20   | <p><b>Burrowing Owl Surveys.</b></p> <p>...</p> <p>Additional burrowing owl breeding season protocol surveys were performed in the project area in March, April, May, June, and July 2025 and non-breeding season protocol surveys were performed in the alternative alignments in September, October, and November 2025.</p> <p><b>APPENDIX 4: BIOLOGICAL RESOURCES</b></p> <p>No burrowing owls were observed along the proposed alignment, but two burrows were observed along Segment 3N: one burrow on the south side of Harper Lake and the other between the Calico Mountains and the Mitchel Range to the west. CNDDDB records at Coso Junction in Segment 1.</p>  | <p><b>Comment:</b> Appendix 4: Biological Resources does not appear to incorporate the 2025 BUOW survey results. SCE provided these surveys to the BLM, CPUC, and their consultants on December 16, 2025. The 2025 findings show 4 live BUOW observed in Segment 1 and 4 live BUOW observed in Segment 3S. As well as 1 BUOW along the Manzanar Alternative and 1 BUOW along the Fossil Falls Alternative for a total of 10 live sightings in 2025.</p> <p>SCE recommends updating Appendix 4 to include and evaluate said data to ensure the analysis reflects the most current information.</p> |                     |                                 |  |          |                |                               |  |                        |   |                    |      |        |                             |   |

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| 33          | 3.5.1.2  | 3.5-5               | <p><b>Survey Protocols</b></p> <p>...</p> <p><b>Jurisdictional Delineation</b></p> <p>...</p> <p>Additional features were mapped May 2 to 5 and May 22 to 26, 2023 for the alternative alignments in Segment 1 of the project area (Arcadis, 2023b; see EIR Chapter 4), May 14 to 16, 2024 in Segment 1, and July 2025 in Segments 1, 3N, and 3S. After the jurisdictional delineations were completed in 2017, the definition of federally jurisdictional wetlands and “waters of the U.S.” have changed several times. The current interpretation is discussed in Section 3.5.2. Considering the changing CWA interpretations and substantial rain events in the project area in recent years, a desktop review of jurisdictional waters was performed in February 2025 to inform the analysis.</p> | <p><b>Comment:</b> SCE’s proposed revisions reflect the additional field verification SCE completed in support of I-C waters permits</p> <p><b>Recommended Language:</b><br/>                     “Additional features were mapped May 2 to 5 and May 22 to 26, 2023 for the alternative alignments in Segment 1 of the project area (Arcadis, 2023b; see EIR Chapter 4), May 14 to 16, 2024 in Segment 1, and July 2025 in Segments 1, 3N, and 3S. <u>Finally, in support of the waters permits, the previous delineations were reviewed and reverified. Additional features were identified and mapped throughout the project alignment in July 2025 (ICF 2025).</u> After the jurisdictional delineations were completed in 2017, the definition of federally jurisdictional wetlands and “waters of the U.S.” have changed several times. The current interpretation is discussed in Section 3.5.2. Considering the changing CWA interpretations and substantial rain events in the project area in recent years, a desktop review of jurisdictional waters was performed in February 2025 to inform the analysis.”</p> |
| 34          | 3.5.4<br>&<br>7.<br>Mitigation<br>Monitoring<br>and<br>Reporting<br>Plan | 3.5-71<br>&<br>7-22 | <p><b>BIO-1a Worker Environmental Awareness Program (WEAP) (Supersedes APM WEAP).</b> SCE shall prepare and implement a project-specific Worker Environmental Awareness Program (WEAP) to educate on-site workers about the Proposed Project’s sensitive environmental issues. The WEAP shall be administered by the lead biologist or a biological monitor to all personnel on-site during the construction phase, including but not limited to surveyors, engineers, inspectors, contractors, subcontractors, supervisors, employees, monitors, visitors, and delivery drivers. If the WEAP presentation is recorded on video, it may be administered by any competent project personnel.</p>   | <p><b>Comment:</b> SCE recommend removing the language identified below. WEAP requirements for delivery drivers and visitors are already included in the WEAP-Lite discussion on page 3.5-73. Adding duplicative or expanded language has caused confusion on prior projects. SCE recommends this change be made throughout the DEIR, where applicable.</p> <p><b>Recommended Language:</b> “<b>BIO-1a Worker Environmental Awareness Program (WEAP) (Supersedes APM WEAP).</b> SCE shall prepare and implement a project-specific Worker Environmental Awareness Program (WEAP) to educate on-site workers about the Proposed Project’s sensitive environmental issues. The WEAP shall be administered by the lead biologist or a biological monitor to all personnel on-site during the construction phase, including but not limited to surveyors, engineers, inspectors, contractors, subcontractors, supervisors, employees, <u>and</u> monitors, <del>visitors, and delivery drivers</del>. If the WEAP presentation is recorded on video, it may be administered by any competent project personnel.”</p>            |

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| 35                                       | 3.5.4  | 3.5-73 | <p><b>MM BIO-1b Biological Monitoring (Supersedes BIO-GEN-1)</b><br/>                     Pre-construction biological resources surveys. SCE shall assign qualified biologists, which may include the Lead Biologist and Biological Monitors (below), as qualified, to perform pre-construction biological surveys at each project work area, access route, and the vicinity. Survey distances will be no less than 300 feet surrounding each work site and along any access route being created or improved, and no less than 100 feet along existing routes. Survey distances may vary, as appropriate, based on target species and as stipulated by project work plans, species-specific plans, and mitigation plans. Where suitable nest sites for raptors are present, the pre-construction surveys for raptor nests will extend to a 500-foot area surrounding the work area or road.</p> <p>Pre-construction surveys shall be planned and implemented to identify locations of special-status plants, wildlife, and nesting birds occurring at work areas, other portions of the ROW, or in adjacent buffer areas. Specific pre-construction survey methods or protocols will vary according to the resources which may be present at any given site, and according to season. At minimum, SCE shall complete pre-construction surveys 10 days prior to beginning work in any given area, and repeat the surveys if the work site remains inactive for a period of ten days or more. During nesting season, a qualified biologist shall complete nesting bird surveys as described in APM BIO-AVI-1 (Impact BIO-5).</p> <p>SCE shall submit resumes of all biologists performing pre-construction and protocol biological surveys to the CPUC for review and approval, in coordination with CDFW and USFWS. Results of pre-construction surveys shall be submitted to CPUC for review and approval and no work shall occur until the CPUC Environmental Monitor has validated the survey results and any applicable resource and work area boundary staking. Each pre-construction survey report shall include methods and results of the preconstruction survey, and a list of biological resources detected at each site during prior focused surveys or pre-construction surveys. The pre-construction survey report format and contents shall be subject to CPUC review and approval.</p> | <p><b>Comment:</b> BIO-1b and BIO-1e both include requirements for pre-construction surveys. SCE recommends revising certain pre-construction survey language in MM BIO-1b and completely deleting MM BIO-1e in order to minimize the potential for overlapping requirements and conflicting language between MMs.</p> <p><b>Recommended Language:</b><br/>                     “Biological Monitoring (Supersedes BIO-GEN-1). Pre-construction biological resources surveys. SCE shall assign qualified biologists, which may include the Lead Biologist and Biological Monitors (below), as qualified, to perform pre-construction biological surveys at each project work area, access route, and the vicinity. <u>Survey distances will vary, as appropriate, based on target species and as stipulated by project work plans and mitigation plans, but will be no less than 300 feet surrounding each work site and along any access route being created or improved. (Improvement is considered to be both overland travel and any road work that causes greater disturbance than light blading of previously existing roads.) For project access along existing routes or routes improved during an earlier phase of the Project, the survey requirement will be 100 feet. An exception would be if a greater distance is stipulated in other applicable project work plans or mitigation measures. Survey distances will be no less than 300 feet surrounding each work site and along any access route being created or improved, and no less than 100 feet along existing routes. Survey distances may vary, as appropriate, based on target species and as stipulated by project work plans, species-specific plans, and mitigation plans.</u> Where suitable nest sites for raptors are present, the pre-construction surveys for raptor nests will extend to a 500-foot area surrounding the work area or road.”</p> |   |     |  |  |     |  |  |     |   |
| 36                                       | 3.5.4  | 3.5-79 | <p><b>MM BIO-1d:</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"><b>Jurisdictional Waters<sup>1</sup></b></td> <td style="width: 30%; border-bottom: 1px solid black;">USACE/RWQCB non-wetland jurisdictional waters</td> <td style="width: 10%; text-align: center;">1:1</td> </tr> <tr> <td></td> <td style="border-bottom: 1px solid black;">CDFW non-wetland jurisdictional waters</td> <td style="text-align: center;">1:1</td> </tr> <tr> <td></td> <td style="border-bottom: 1px solid black;">State and Federal jurisdictional wetland areas</td> <td style="text-align: center;">3:1</td> </tr> </table> <p><sup>1</sup> Specific ratios may vary depending on updated jurisdictional delineation.</p>   | <b>Jurisdictional Waters<sup>1</sup></b>  | USACE/RWQCB non-wetland jurisdictional waters | 1:1 |  | CDFW non-wetland jurisdictional waters | 1:1 |  | State and Federal jurisdictional wetland areas | 3:1 | <p><b>Comment:</b> SCE recommends updating the table to make the compensation ratios consistent with APM WET-1, which states a minimum ratio of 1:1. SCE also recommends updating the footnote associated with the table to reflect agency involvement and discretion.</p> <p><b>Recommended Language:</b> For waters recommend minimum 1:1 for all waters resources. Update the footnote to “<u>final mitigation ratios will be negotiated with the agencies and formalized in the agency authorizations.</u>”</p> |
| <b>Jurisdictional Waters<sup>1</sup></b> | USACE/RWQCB non-wetland jurisdictional waters  | 1:1    |  |   |   |     |  |  |     |  |  |     |   |
|  | CDFW non-wetland jurisdictional waters         | 1:1    |  |   |   |     |  |  |     |  |  |     |   |
|  | State and Federal jurisdictional wetland areas | 3:1    |  |   |   |     |  |  |     |  |  |     |   |
| 37                                       | 3.5.4  | 3.5-80 | <p><b>MM BIO-1d Compensation for habitat loss.</b><br/>                     ...<br/>                     Compensation lands will be placed under conservation management to be funded through the terms described herein. If there is any discrepancy between the requirements of this mitigation measure and requirements of any resource agency permit (e.g., USFWS Biological Opinion, CDFW Incidental Take Permit, CDFW LSAA), the more stringent (highest ratio) requirement shall apply.</p>   | <p><b>Comment:</b> If the applicable agency (USFW, ACOE, etc.) establish compensation ratios that differ from those listed in this table, the ratios established by the applicable agency should govern.</p> <p><b>Recommended Language:</b><br/>                     “Compensation lands will be placed under conservation management to be funded through the terms described herein. If there is any discrepancy between the requirements of this mitigation measure and requirements of any resource agency permit (e.g., USFWS Biological Opinion, CDFW Incidental Take Permit, CDFW LSAA), <del>the more stringent (highest ratio)</del> <u>resource agency</u> requirement shall apply.”</p>   |   |     |  |  |     |  |  |     |   |

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| 38 | 3.5.4 | 3.5-88 | <p><b>MM BIO-1j Raven Monitoring, Management, and Control Plan</b> Prior to the start of construction activities, SCE shall prepare and implement a Raven Monitoring, Management, and Control Plan (Raven Plan) consistent with USFWS raven management guidelines and that meets the approval of the CPUC and BLM in consultation with USFWS, and CDFW. The purpose of the Raven Plan shall be to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, restoration, and operations and maintenance phases. The Plan shall address all project components and their potential effects on raven numbers and activity. The threshold for implementation of raven control measures shall be any increases in raven numbers from baseline conditions, as detected by monitoring to be implemented pursuant to the Plan. Regardless of raven monitoring results, SCE shall be responsible for all other aspects of raven management described in the Raven Plan, such as avoid-ance and minimization of project-related trash, water sources, or perch/roost/nest sites that could contribute to increased raven numbers. In addition, to offset the cumulative contributions of the Project to desert tortoise impacts from increased raven numbers, SCE shall contribute to the USFWS Regional Raven Management Program.</p> <p>SCE shall:</p> <p>(a) Prepare and Implement a Raven Management Plan that shall include, but shall not be limited to, the following components. The Plan shall be reviewed and approved by CPUC, USFWS, and CDFW prior to the start of construction activities. (i) Identify all potential project activities, structures, components, and other effects that could provide predator subsidies or attractants, including potential sources of food and water, and nesting materials, as well as nest or perch sites. These will include but will not be limited to: waste food material, road-killed animals, water storage, potential pooling from leaks, dust control, or wastewater, debris from brush clearing, and perch or roost sites on project facilities and infrastructure.</p> <p>(ii) Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities.</p> <p>(iii) Appoint a qualified biologist who will implement a monitoring schedule and field methods for the purpose of locating any ravens present in the Project vicinity and detecting any increase in raven numbers or activity.</p> <p>(iv) Specify raven activity thresholds for implementation of control measures.</p> <p>(v) Describe control practices for ravens to be implemented as needed based on the monitoring results.</p> <p>(vi) Address monitoring and nest removal during construction and for the life of the Project.</p> <p>(vii) Describe reporting schedules and requirements.</p> <p>(b) Contribute to the USFWS Regional Raven Management Program. No later than 30 days prior to the start of construction, SCE shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of \$105 per acre of ...</p> | <p><b>Comment:</b> SCE has worked collaboratively with the stakeholder agencies to develop a programmatic raven management plan to more effectively address SCE infrastructure impacts to desert tortoise by subsidizing common raven nesting opportunities. SCE requests replacing the sections of MM BIO-1j requiring preparation of a Raven Monitoring Management and Control Plan with the following language in order to incorporate Ivanpah-Control into the programmatic plan for addressing common raven impacts to desert tortoise.</p> <p><b>Recommended Language:</b></p> <p><del>“MM BIO-1j Raven Monitoring, Management, and Control Plan</del> Prior to the start of construction activities, SCE shall prepare and implement a Raven Monitoring, Management, and Control Plan (Raven Plan) consistent with USFWS raven management guidelines and that meets the approval of the CPUC and BLM in consultation with USFWS, and CDFW. The purpose of the Raven Plan shall be to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, restoration, and operations and maintenance phases. The Plan shall address all project components and their potential effects on raven numbers and activity. The threshold for implementation of raven control measures shall be any increases in raven numbers from baseline conditions, as detected by monitoring to be implemented pursuant to the Plan. Regardless of raven monitoring results, SCE shall be responsible for all other aspects of raven management described in the Raven Plan, such as avoid-ance and minimization of project-related trash, water sources, or perch/roost/nest sites that could contribute to increased raven numbers. In addition, to offset the cumulative contributions of the Project to desert tortoise impacts from increased raven numbers, SCE shall contribute to the USFWS Regional Raven Management Program. <del>s</del></p> <p>SCE shall:</p> <p>(a) Prepare and Implement a Raven Management Plan that shall include, but shall not be limited to, the following components. The Plan shall be reviewed and approved by CPUC, USFWS, and CDFW prior to the start of construction activities. (i) Identify all potential project activities, structures, components, and other effects that could provide predator subsidies or attractants, including potential sources of food and water, and nesting materials, as well as nest or perch sites. These will include but will not be limited to: waste food material, road-killed animals, water storage, potential pooling from leaks, dust control, or wastewater, debris from brush clearing, and perch or roost sites on project facilities and infrastructure.</p> <p>(ii) Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities.</p> <p>(iii) Appoint a qualified biologist who will implement a monitoring schedule and field methods for the purpose of locating any ravens present in the Project vicinity and detecting any increase in raven numbers or activity.</p> <p>(iv) Specify raven activity thresholds for implementation of control measures.</p> <p>(v) Describe control practices for ravens to be implemented as needed based on the monitoring results.</p> <p>(vi) Address monitoring and nest removal during construction and for the life of the Project.</p> <p>(vii) Describe reporting schedules and requirements.</p> <p>Upon completion of construction, SCE will incorporate the Project into the SCE Programmatic Raven Management Plan by adding funding to the annual budget based</p> |
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|             |         |      |                        | <p><u>on the number miles of Project line and components within desert tortoise habitat and the current funding rate which is adjusted for inflation annually. The SCE Programmatic Raven Management Plan is a plan developed with USFWS, BLM, USFS, CDFW, NDOW, NPS, and Wildlife Services to address common ravens associated with utility infrastructure impact on desert tortoise with the intent of reducing desert common raven population.</u></p> <p><u>No later than 30 days prior to the start of construction, SCE will contribute to USFWS's Regional Raven Management Program by making a one-time payment of \$105 per acre of long term or permanent Project disturbance within desert tortoise habitat to the National Fish and Wildlife Federation Renewable Energy Action Team raven control account.</u></p> <p><u>(b) Contribute to the USFWS Regional Raven Management Program. No later than 30 days prior to the start of construction, SCE shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of \$105 per acre of ..."</u></p> |

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| 39          | 3.5.4<br>&<br>7.7 | 3.5-93<br>&<br>7-41 | <p><b>Bio-6a Bird and Bat Collision.</b> Transmission line support structures and other facility structures shall be designed in compliance with current standards and practices to discourage their use by raptors for perching or nesting (e.g., by use of anti-perching devices). This design also reduces the potential for increased predation of special-status species, such as the desert tortoise. Mechanisms to visually warn birds (permanent markers or bird flight diverters) shall be placed on transmission lines at regular intervals to prevent birds from colliding with the lines (APLIC, 2006, 2012). To the extent practicable, the use of guy wires shall be avoided because they pose a collision hazard for birds and bats. Necessary guy wires shall be clearly marked with bird flight diverters to reduce the probability of collision. Shield wires shall be marked with devices that have been scientifically tested and found to significantly reduce the potential for bird collisions. Transmission lines shall maintain sufficient distance between all conductors and grounded components to prevent potential for electrocution of the largest birds that may occur in the area (e.g., golden eagle and turkey vulture). They shall utilize non-specular conductors and nonreflective coatings on insulators.</p> | <p><b>Comment:</b> SCE requests that the CPUC modify MM Bio-6a to address the following comments:</p> <p>Anti-perching devices are not effective at preventing perching, often create opportunities for nesting, and lead to unnecessary maintenance costs. The project design itself will reduce perching by continuing to use monopole structures rather than lattice structures, which is considered a method for reducing perching and nesting. Additionally, the Project will reduce the total number of structures currently on this line.</p> <p>SCE proposes adding language to clarify that, SCE, using APLIC guidance, will determine appropriate locations for installation of devices. SCE line marking devices. Installing line marking devices along the whole length of this project would be unnecessary, expensive, and cause high maintenance costs.</p> <p>SCE proposes removing language regarding guy wires because guy wires themselves are not known to be a collision threat. Rather it is the lack of FAA lighting and height over 200 feet are the main factors leading to bird mortality on guy wires.</p> <p>Note that the use of non-specular conductor is for visual impacts. There is no science suggesting they reduce collision risk nor that reflective conductor increases collision. While the Project will utilize non-specular conductor, SCE suggests removing this language from the mitigation measure for clarity.</p> <p>SCE recommends these changes be made throughout the DEIR, where appropriate.</p> <p><b>Recommended Language</b><br/> <b>“BIO-6a Bird and Bat Collision.</b> Transmission line support structures and other facility structures shall be designed in compliance with current standards and practices to discourage their use by raptors for perching or nesting (e.g., by use of anti-perching devices). This design also reduces the potential for increased predation of special-status species, such as the desert tortoise. <u>In locations assessed to have a high collision risk, such as locations crossing the Owens River, wetlands, or agricultural fields that attract birds,</u> mechanisms to visually warn birds (permanent markers or bird flight diverters) shall be placed on transmission lines at regular intervals to prevent birds from colliding with the lines (APLIC, 2006, 2012). <del>To the extent practicable, the use of guy wires shall be avoided because they pose a collision hazard for birds and bats. Necessary guy wires shall be clearly marked with bird flight diverters to reduce the probability of collision.</del> Shield wires shall be marked with devices that have been scientifically tested and found to significantly reduce the potential for bird collisions. Transmission lines shall maintain sufficient distance between all conductors and grounded components to prevent potential for electrocution of the largest birds that may occur in the area (e.g., golden eagle and turkey vulture). <del>They shall utilize non-specular conductors and non-reflective coatings on insulators.”</del></p> |

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| 40          | 3.6     | 3.6-46 | <p><b>Table 3.6-6. Precontact Archaeological Resources in Segment 1 Individually Eligible for the CRHR</b><br/>                     ...<br/>                     "All of these resources would require data recovery."<br/> <b>Table 3.6-7. Precontact Archaeological Resources in Segments 2, 3N and 3S Eligible for the CRHR</b><br/>                     ...<br/>                     "All of these resources would require data recovery."</p>             | <p><b>Comment:</b> Section 3.6.3 is a discussion on environmental impacts of the Proposed Project not a discussion on proposed mitigation to resolve impacts. Tables 3.6-6 and 3.6-7 and the paragraph between the tables prematurely identifies resources requiring data recovery. Furthermore, there is no discussion on why certain resources would be subject to data recovery or if data recovery is the appropriate mitigation in this section. The tables identify numbers of resources requiring data recovery but do not identify the specific resources, making the identification incomplete. SCE recommends removing all references to data recovery in Section 3.6.3.</p> <p><b>Recommended Language:</b> SCE proposes removing the column titled the "Eligible Resources Requiring Data Recovery" from Table 3.6-6 and removing (all require data recovery) from Table 3.6-7<br/>                     Segments 2, 3N, and 3S, there are a total of 17 precontact resources that are considered eligible for the CRHR (see Table 3.6-7). <del>All of these resources would require data recovery.</del> Details on these resources are presented in Appendix 5A, Tables Ap.5-2 through Ap.5-4.</p> |
| 41          | 3.6     | 3.6-50 | <p><b>Table 3.6-8 Historic Era Archaeological Resources Eligible for the CRHR</b><br/>                     ...<br/>                     identifies eligible cultural resources and which ones would require data recovery.<br/> <b>Table 3.6-9 Historic Era Built Environment Resources Eligible for the CRHR</b><br/>                     ...<br/>                     identifies eligible cultural resources and which ones would require data recovery.</p> | <p><b>Comment:</b> Section 3.6.3 is a discussion on environmental impacts of the Proposed Project not a discussion on proposed mitigation to resolve impacts. See comment above for further information, SCE recommends removing all references to data recovery in this section. SCE proposes removing the column titled "Eligible Resources Requiring Data Recovery" from Table Tables 3.6-8 and 3.6-9.</p> <p><b>Recommended Language:</b> <del>"Eligible Resources Requiring Data Recovery"</del></p>   |

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| 42          | 3.6     | 3.6-56 | <p><u>Direct Impacts to SWCA-L030-1056 and SWCA-L030-1056B</u></p> <p><b>SIGNIFICANT AND UNAVOIDABLE.</b> There are two particularly large and valuable sites located north of the community of Lone Pine. The sites (identified as SWCA-L030-1056 and SWCA-L030-1056B) encompass the entire disturbance area that would be required for the construction of one new structure and removal of an existing structure. Project effects would create a significant impact.</p> <p>Avoidance of any new ground disturbance within the boundaries of these sites is required to minimize further damage. In addition, use of the existing access road between the two adjacent SCE structures would cause substantial further damage, so access options are required.</p> <p>The specific location is not identified due to confidentiality requirements, but its avoidance and treatment is defined in Mitigation Measure CUL-1h (Avoid Disturbance Within Environmentally Sensitive Area). The measure defines the relocation of one specific structure, allowing the Project to span the entire site, the prohibition of use of the existing access road between the two adjacent sites, and the restoration of the existing access road to prevent future use by SCE or others. Due to the size of the site and the potential that its features extend beyond the current mapping, this impact remains significant and unavoidable, even with implementation of Mitigation Measure CUL-1h.</p> <p>This resource would be avoided by the Manzanar Realignment Alternative, but the removal of existing structures would still be required. Mitigation Measure CUL-1h would apply to the alternative as well as the Proposed Project.</p> | <p><b>Comment:</b> CUL-1i should focus on realignment of the Proposed Project to avoid this resource to the extent feasible, but acknowledge that due to the size of the site, avoidance may not be entirely possible. SCE proposes the following edits to clarify minimization methods.</p> <p><b>Recommended Language:</b> “<u>Direct Impacts to SWCA-L030-1056 and SWCA-L030-1056B</u></p> <p><b>SIGNIFICANT AND UNAVOIDABLE.</b> There are two particularly large and valuable sites located north of the community of Lone Pine. The sites (identified as SWCA-L030-1056 and SWCA-L030-1056B) encompass the entire disturbance area that would be required for the construction of one new structure and removal of an existing structure. Project effects would create a significant impact.</p> <p><del>Avoidance</del> <u>Minimization</u> of any new ground disturbance within the boundaries of these sites is required to minimize further damage. In addition, <u>no widening of the existing access road is permitted. use of the existing access road between the two adjacent SCE structures would cause substantial further damage, so access options are required.</u></p> <p><del>The specific location is not identified due to confidentiality requirements, but its avoidance and treatment is defined in Mitigation Measure CUL-4h 1i (Avoid Disturbance Within Environmentally Sensitive Area). The measure defines requires the relocation of the Proposed one specific structure, allowing the Project to span the entire site, the prohibition of use of the existing access road between the two adjacent sites, and the restoration of the existing access road to prevent future use by SCE or others.</del> Due to the size of the site and the potential that its features extend beyond the current mapping, this impact remains significant and unavoidable, even with implementation of Mitigation Measure CUL--4h 1i.</p> <p>This resource would be avoided by the Manzanar Realignment Alternative, but the removal of existing structures would still be required. Mitigation Measure CUL--4h 1i would apply to the alternative as well as the Proposed Project.”</p> |

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| 43          | 3.6     | 3.6-56 | <p><u><i>Direct Impacts to the Rand Historic District</i></u></p> <p><b>SIGNIFICANT AND UNAVOIDABLE.</b> Significant and unavoidable direct impacts are anticipated to 14 contributors to the Rand Historic District (P-15-007069) located within central region of San Bernardino County, near Barstow (P-15-002500, SWCA-L030-1168, SWCA-L030-1173, SWCA-L030-1174, SWCA-L030-1177, SWCAL030-1184, SWCA-L030-1185, SWCA-L030-5150, SWCA-L030-5151, SWCA-L030-5152, SWCA-L030-5153, SWCA-L030-5154, SWCA-L030-5155, SWCA-L030-5161). A California State Historical Landmark, the Rand Historic District commemorates a mining region operating in gold, tungsten and silver for 35 years. These individual resources each contribute to the significance of the larger Rand Historic District because they possess characteristics that support the district's overall historical, cultural, or scientific value.</p> <p>The sites would be impacted by various types of ground disturbing construction including the removal of steel lattice suspension structures and their associated demolition sites, the installation of TSP monopoles and their associated structure work areas, shunt removal areas, splice sites, pull sites, guard sites, and access roads that will be graded and improved as needed. Project effects would create a significant impact to each of the fourteen historic-era resources. Avoidance of any new ground disturbance within the boundaries of these sites is not feasible. Treatment is defined in Mitigation Measure CUL-1j. The measure requires the preparation of formal documentation of the historic district which includes the preparation of DPR form 523D (district record) and associated maps of the district boundary and the location of all previously recorded contributors including the fourteen resources impacted here.</p> <p>The effects of the Proposed Project would create a significant impact in the permanent loss of portions of CRHR-eligible resources that are also part of a California State Historical Landmark. As such, the impact on these 14 eligible historic-era archaeological resources would remain significant and unavoidable, even after implementation of Mitigation Measure CUL-1j (Avoid and/or Mitigate Loss from Direct Impacts to Historic-Era Archaeological Resources Contributing to the Rand Historic District (P-15-007069)).</p> | <p><b>Comment:</b> SCE disagrees with the impact assessment to the Rand Historic District because while the 14 listed sites are individually Ineligible, but eligible as contributor to Rand Historic District under Criterion 1. As the sites are eligible under Criteria 1, not Criteria 4, the impact should result in a less than significant with mitigation impact rather than significant and unavoidable impact. As such, SCE proposes the following edits.</p> <p><b>Recommended Language:</b> "<u><i>Direct Impacts to the Rand Historic District</i></u></p> <p><u><i>LESS THAN SIGNIFICANT WITH MITIGATION SIGNIFICANT AND UNAVOIDABLE.</i></u> Significant and unavoidable Direct impacts are anticipated to 14 contributors to the Rand Historic District (P-15-007069) located within central region of San Bernardino County, near Barstow (P-15-002500, SWCA-L030-1168, SWCA-L030-1173, SWCA-L030-1174, SWCA-L030-1177, SWCAL030-1184, SWCA-L030-1185, SWCA-L030-5150, SWCA-L030-5151, SWCA-L030-5152, SWCA-L030-5153, SWCA-L030-5154, SWCA-L030-5155, SWCA-L030-5161). A California State Historical Landmark, the Rand Historic District commemorates a mining region operating in gold, tungsten and silver for 35 years. These individual resources each contribute to the significance of the larger Rand Historic District because they possess characteristics that support the district's overall historical, cultural, or scientific value.</p> <p>The sites would be impacted by various types of ground disturbing construction including the removal of steel lattice suspension structures and their associated demolition sites, the installation of TSP monopoles and their associated structure work areas, shunt removal areas, splice sites, pull sites, guard sites, and access roads that will be graded and improved as needed. <del>Project effects would create a significant impact to each of the fourteen historic-era resources. Avoidance of any new ground disturbance within the boundaries of these sites is not feasible.</del> As the 14 sites are contributors to the Rand Historic District (P-15-007069) under criteria a/1, the Treatment is defined in Mitigation Measure CUL-4j 1k would result in an impact of less than significant with mitigation. The measure requires the preparation of formal documentation of the historic district which includes the preparation of DPR form 523D (district record) and associated maps of the district boundary and the location of all previously recorded contributors including the <del>fourteen</del> 14 resources impacted here.</p> <p><del>The effects of the Proposed Project would create a significant impact in the permanent loss of portions of CRHR-eligible resources that are also part of a California State Historical Landmark. As such, the impact on these 14 eligible historic-era archaeological resources would remain significant and unavoidable, even after implementation of Mitigation Measure CUL-1j (Avoid and/or Mitigate Loss from Direct Impacts to Historic-Era Archaeological Resources Contributing to the Rand Historic District (P-15-007069)).</del>"</p> |

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| 44          | 3.6     | 3.6-58 | <p><u>Direct Impacts to the Manzanar Airfield</u></p> <p><i>LESS THAN SIGNIFICANT WITH MITIGATION.</i> As shown in Table 2-3 (Potential Material Yard Locations), SCE proposes the potential use of the 4.6-acre site as a project construction yard. During scoping and in site visits with SCE and the cultural resources team, National Park Service (NPS) staff at the Manzanar National Historic Site described their concern related to potential impacts that would result from SCE’s proposed use of the Manzanar Airfield area for a Material Yard. While the airfield is not within the boundaries of the NPS site or the designated National Historic Landmark, it is an important component of the Manzanar War Relocation Center facilities. The use of the airfield for a material yard has the potential to damage an important historical resource; any damage to the airfield surfaces would be a significant impact. Mitigation Measure CUL-1I (Avoid Damage to Manzanar Airfield) would ensure that impacts to the airfield are less than significant.</p>   | <p><b>Comment:</b> The Proposed Material Yard at Manzanar Airfield has been removed from the Project, as indicated in SCE’s response to Data Request #18-3 on 11/21/2024. Therefore, SCE proposes removing any discussion associated with the proposed material yard at Manzanar Airfield. SCE recommends deleting any reference to the material yard at the Manzanar Airfield and MM CUL-1I.</p> <p><b>Recommended Language:</b> “<u>Direct Impacts to the Manzanar Airfield</u><br/> <i>LESS THAN SIGNIFICANT WITH MITIGATION.</i> As shown in Table 2-3 (Potential Material Yard Locations), SCE proposes the potential use of the 4.6-acre site as a project construction yard. During scoping and in site visits with SCE and the cultural resources team, National Park Service (NPS) staff at the Manzanar National Historic Site described their concern related to potential impacts that would result from SCE’s proposed use of the Manzanar Airfield area for a Material Yard. While the airfield is not within the boundaries of the NPS site or the designated National Historic Landmark, it is an important component of the Manzanar War Relocation Center facilities. The use of the airfield for a material yard has the potential to damage an important historical resource; any damage to the airfield surfaces would be a significant impact. Mitigation Measure CUL-1I (Avoid Damage to Manzanar Airfield) would ensure that impacts to the airfield are less than significant.”</p>   |
| 45          | 3.6     | 3.6-59 | <p><b>MM CUL-1a Retain a Cultural Resources Specialist.</b> Prior to the start of construction, SCE shall identify a project Cultural Resources Specialist (CRS) and one or more alternates whose training and background conforms to the U.S. Secretary of Interior’s Professional Qualifications Standards, as published in Title 36, Code of Federal Regulations, part 61 (36 C.F.R., part 61). The CRS shall be retained by SCE to supervise monitoring of construction excavations and to prepare a Cultural Resources Management Plan (CRMP; see Mitigation Measure CUL-1c) for the approved project. Their qualifications shall be appropriate to the needs of the project, specifically an archaeologist with demonstrated prior experience in the Owens Valley and Mojave Desert regions and previous experience working with Southern California Tribal Nations. A copy of their qualifications shall be provided to the CPUC for review and approval prior to beginning work. The project Cultural Resources Specialist and alternate(s) shall use the services of Cultural Resources Monitors (CRMs), tribal monitors and field crew as needed, to assist in mitigation, monitoring, as needed curation, and reporting activities, as outlined in the CRMP. A copy of all proposed cultural staff qualifications shall be provided to the CPUC for review and approval prior to beginning work.</p> | <p><b>Comment:</b> SCE proposes the following edits to MM CUL -1a to reflect SCE’s responsibility for the implementation of all mitigation measures as well as the fact that SCE retains qualified Cultural Resources Specialist (CRS) on staff who oversee consultant CRS.</p> <p><b>Recommended Language:</b><br/> “Prior to the start of construction, SCE shall identify a <u>consultant</u> project Cultural Resources Specialist (CRS) and one or more alternates whose training and background conforms to the U.S. Secretary of Interior’s Professional Qualifications Standards, as published in Title 36, Code of Federal Regulations, part 61 (36 C.F.R., part 61). The <u>consultant</u> CRS shall be retained by SCE to <u>assist SCE in the following:</u> supervise monitoring of construction excavations and to prepare a Cultural Resources Management Plan (CRMP; see Mitigation Measure CUL-1c) for the approved project. Their qualifications shall be appropriate to the needs of the project, specifically an archaeologist with demonstrated prior experience in the Owens Valley and Mojave Desert regions and previous experience working with Southern California Tribal Nations. A copy of their qualifications shall be provided to the CPUC for review and approval prior to beginning work. The project Cultural Resources Specialist and alternate(s) shall use the services of Cultural Resources Monitors (CRMs), tribal monitors and field crew as needed, to assist in mitigation, monitoring, as needed curation, and reporting activities, as outlined in the CRMP. A copy of all proposed cultural staff qualifications shall be provided to the CPUC for review and approval prior to beginning work.”</p> |

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| 46          | 3.6<br>&<br>7.7 | 3.6-59<br>&<br>7-42             | <p><b>MM CUL-1b Develop Data Recovery Plans for Known Historical Archaeological Resources.</b> If avoidance or preservation in place of an NRHP or CRHR listed or eligible resource is not feasible by the project design, then a data recovery plan shall be developed by the CRM for those impacted resources by Project segment. For precontact sites, the data recovery plan shall be developed in consultation with consulting tribes, for the portion of the resource that will be directly impacted, and will be limited to scientifically consequential data, per CEQA Guidelines § 15126.4(b)(3). The Data Recovery Plan shall include, but is not limited to, the follow:...</p> | <p><b>Comment:</b> Not all resources require data recovery. In some cases, other treatments may be appropriate. SCE proposes rewording mitigation measure CUL-1d to use the term “treatment plan” rather than data recovery to account for a more diverse set of possible treatments as outlined in CEQA Guidelines § 15126.4(b).</p> <p><b>Recommended Language:</b> “<b>MM CUL-1b Develop Data Recovery Treatment Plans for Known Historical Archaeological Resources.</b> If avoidance or preservation in place of an NRHP or CRHR listed or eligible resource is not feasible by the project design, then a <u>data recovery treatment</u> plan shall be developed by the <u>SCE CRM</u> for those impacted resources by Project segment. For precontact sites, the <u>data recovery treatment</u> plan shall be developed in consultation with consulting tribes, for the portion of the resource that will be directly impacted, <u>and if data recovery is identified as the treatment</u>, it will be limited to scientifically consequential data, per CEQA Guidelines § 15126.4(b)(3). The <u>data recovery treatment</u> Plan shall include, but is not limited to, the follow:</p> <p>.....</p> <p><u>The Treatment Plan shall be submitted to the CPUC for review and approval prior to the start of construction.</u></p> <p><u>CPUC shall be notified of completion of treatment at each resource prior to construction. A final <u>treatment</u> report(s) shall be <u>written for data recovery efforts undertaken and submitted to the CPUC for review within 6 months of fieldwork completed. and approval prior to the start of construction beginning in that specific area.</u> Once approved the report(s) will be sent to the appropriate CHRIS information center.”</u></p> |
| 47          | 3.6<br>&<br>7.7 | 3.6-61<br>– 3.6-63<br>&<br>7-44 | <p><b>MM CUL-1d Prepare and Implement a Cultural Resources Management Plan.</b></p> <p>.....</p> <p><b>Develop Data Recovery Plan for Previously Undiscovered Resources:</b> If avoidance of an NRHP or CRHR listed or eligible resource is not feasible, then a data recovery plan shall be developed by the CRM. For precontact sites, the data recovery plan shall be developed in consultation with consulting tribes, for the portion of the resource that will be directly impacted, and will be limited to scientific consequential data, per CEQA Guidelines § 15126.4(b)(3). The Data Recovery Plan shall define the following options for treatment.</p>                         | <p><b>Comment:</b> Not all resources require data recovery. In some cases, other treatments may be appropriate. SCE proposes rewording mitigation measure CUL-1d to use the term “treatment plan” rather than data recovery to account for a more diverse set of possible treatments as outlined in CEQA Guidelines § 15126.4(b).</p> <p><b>Recommended Language:</b> “<b>Develop Data Recovery Treatment Plan for Previously Undiscovered Resources:</b> If avoidance of an NRHP or CRHR listed or eligible resource is not feasible, then a <u>data recovery treatment</u> plan shall be developed by <u>SCE the CRM</u>. For precontact sites, the <u>data recovery treatment</u> plan shall be developed in consultation with consulting tribes, for the portion of the resource that will be directly impacted, <u>and if data recovery is identified as the treatment</u>, it will be limited to scientific consequential data, per CEQA Guidelines § 15126.4(b)(3). The <u>Treatment Data Recovery</u> Plan shall define the following options for treatment.”</p>  |

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| 48          | 3.6<br>&<br>7.7 | 3.6-61<br>– 3.6-<br>63<br><br>&<br><br>7-44 | <p><b>MM CUL-1d</b></p> <p><b>Assessment of Human Remains.</b></p> <p>.....</p> <p>The CRMP shall consider the use of Historic Human Remains Detection (HHRD) dogs before the start of ground disturbance in Segment 1. The purpose of using HHRD dogs would be to identify areas with human remains prior to their being disturbed by construction activity and to evaluate whether the construction disturbance areas can be re-defined to avoid the areas where remains were identified by the dogs. Selection of areas where HRD dogs would be used shall be based on tribal consultation, and tribal monitors must be invited and paid during use of HRD dogs. If the dogs identify the likely presence of human remains, SCE shall consult with tribes and shall evaluate feasibility of relocating the ground disturbing activities at least 50 feet outside of the area where human remains were detected. This process shall be defined in the CRMP.</p> <p>.....</p> | <p><b>Comment:</b> The use of HHRD dogs at this late stage in the Project is not feasible for engineering planning because it is not feasible to potentially move structures based on the findings of HHRD dogs after design has been finalized and a right-of-way chosen. Furthermore, HHRD dogs do not, by themselves, scientifically pinpoint the presence of human remains at a scale that would be accurate to relocate work areas. HHRD dogs do not identify exact locations of human remains as human remains scents travel away from the decomposing body or skeleton by way of diffusion or vapor transport and follow the path of least resistance. Natural and man-made environments heavily influence this process. Therefore, it is not feasible or scientifically reliable to require SCE to move work areas based on HHRD dogs alone. At a minimum this would also require archaeological excavation to confirm the presence of human remains prior to project redesign. Because the use of the HHRD dogs would not assist in avoiding human remains, SCE recommends removing this language from Mitigation Measure CUL-1d .</p> <p><b>Recommended Language:</b> <del>“The CRMP shall consider the use of Historic Human Remains Detection (HHRD) dogs before the start of ground disturbance in Segment 1. The purpose of using HHRD dogs would be to identify areas with human remains prior to their being disturbed by construction activity and to evaluate whether the construction disturbance areas can be re-defined to avoid the areas where remains were identified by the dogs. Selection of areas where HRD dogs would be used shall be based on tribal consultation, and tribal monitors must be invited and paid during use of HRD dogs. If the dogs identify the likely presence of human remains, SCE shall consult with tribes and shall evaluate feasibility of relocating the ground disturbing activities at least 50 feet outside of the area where human remains were detected. This process shall be defined in the CRMP.”</del></p> |

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| 49          | 3.6<br>&<br>7.7 | 3.6-61<br>– 3.6-<br>63<br><br>&<br><br>7-44 | <p><b>Operations and Maintenance:</b> The CRMP shall include a section defining protection of cultural resources during maintenance activities. The following issues shall be addressed:</p> <p>SCE will develop a non-confidential GIS database that shows ESAs that will be avoided during O&amp;M activities. The database will be made available to O&amp;M staff to ensure all NRHP and CRHR eligible or listed resources are avoided during O&amp;M activities.</p> <p>Before O&amp;M activities are to commence in project areas requiring survey, SCE shall perform cultural resources surveys for any APIs not yet surveyed (e.g., new, or modified staging areas, pull sites, or other work areas) and areas covered by expired surveys (older than 10 years). This includes areas of planned O&amp;M activity. Resources discovered during the surveys will be evaluated and the results will be prepared in stand-alone reports and finally incorporated into this CRMP and managed accordingly.</p> | <p><b>Comment:</b> SCE proposes the following edit to clarify that SCE does not plan to provide a non-confidential GIS database of cultural resources to O&amp;M staff because SCE does not allow O&amp;M staff to manage themselves on avoidance of cultural resources. Rather, projects with the potential to impact resources are submitted to the environmental department for review. SCE qualified archaeological staff and consultants review all O&amp;M projects that have the potential to impact cultural resources and apply the appropriate protection measures, including if new surveys are needed. For locations on public lands this process is completed with the public land managing agency in accordance with their required approval process. The CRMP should not dictate the methods by which SCE complies with applicable regulations for O&amp;M work, rather just ensure SCE does comply.</p> <p><b>Recommended Language:</b></p> <p><b>“Operations and Maintenance:</b> The CRMP shall include a section defining protection of cultural resources during maintenance activities. The following issues shall be addressed:</p> <p><u>SCE will conduct a cultural resources review of all O&amp;M activities that have the potential to impact cultural resources and apply the appropriate measures to protect NRHP/CRHR resources during O&amp;M activities. Generally, the same measures applied during construction of the project will be used during O&amp;M activities on non-public lands. O&amp;M activities on public lands will follow the appropriate public lands O&amp;M approval process.</u></p> <p><del>develop a non-confidential GIS database that shows ESAs that will be avoided during O&amp;M activities. The database will be made available to O&amp;M staff to ensure all NRHP and CRHR eligible or listed resources are avoided during O&amp;M activities.</del></p> <p><del>Before O&amp;M activities are to commence in project areas requiring survey, SCE shall perform cultural resources surveys for any APIs not yet surveyed (e.g., new, or modified staging areas, pull sites, or other work areas) and areas covered by expired surveys (older than 10 years). This includes areas of planned O&amp;M activity. Resources discovered during the surveys will be evaluated and the results will be prepared in stand-alone reports and finally incorporated into this CRMP and managed accordingly.”</del></p> |

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| 50          | 3.6<br>&<br>7.7 | 3.6-64<br>&<br>7-47 | <p><b>MM CUL-1f Tribal Monitoring.</b> Tribal Monitors shall be employed by SCE to conduct full-time on-site monitoring during all ground disturbing activities for the duration of construction activities. The intensity of monitoring may be adjusted with the concurrence of the CPUC, SCE and tribal representatives.</p> <p>Preference for Tribal Monitors will be given to consulting tribes. Should multiple consulting tribes request to monitor during construction, SCE will develop a rotating schedule to ensure an equitable monitoring workload. The schedule will be included in the CRMP (see MM CUL-1c). If a senior tribal representative is needed on the Project Area during construction, they shall be compensated in addition to the Tribal Monitors.</p>                    | <p><b>Comment:</b> SCE proposes the following edits to clarify that tribal monitoring should occur at the same level of effort as archaeological monitor and cannot exceed the level or locations of the archaeological monitoring requirements, and that both archaeological and tribal monitoring on federal lands must comply with the federal land managing agencies policies.</p> <p><b>Recommended Language:</b> “<b>MM CUL-1f Tribal Monitoring.</b> Tribal Monitors shall be employed by SCE during construction and demolition activities on Segment 1, SCE shall provide tribal monitors the opportunity to conduct full-time on-site monitoring during all ground disturbing activities, including those activities occurring in previously disturbed soil. During construction on Segments 2, 3N, and 3S, tribal monitoring shall occur within 100 feet of NRHP or CRHR listed or eligible resources with tribal significance. <del>to conduct full-time on-site monitoring during all ground disturbing activities for the duration of construction activities.</del> The intensity of monitoring may be adjusted with the concurrence of the CPUC, SCE and tribal representatives. <u>On federal lands, tribal monitoring efforts shall be in accordance with the land managing agencies requirements and approval.</u> Preference for Tribal Monitors will be given to consulting tribes. Should multiple consulting tribes request to monitor during construction, SCE will develop a rotating schedule to ensure an equitable monitoring workload. The schedule will be included in the CRMP (see MM CUL-1ed). If a senior tribal representative is needed on the Project Area during construction, they shall be compensated in addition to the Tribal Monitors.”</p> |
| 51          | 3.6             | 3.6-64              | <p><b>MM CUL-1g Remove Structures by Helicopter in Culturally Sensitive Areas.</b> At least 90 days prior to the start of construction of each of the Project segments (Segments 1, 2, 3N and 3S), the CRS shall identify culturally sensitive areas for the segment on detailed maps consultation with CPUC and consulting tribes. Any existing structures within the boundaries of a known precontact-era cultural resource on private or state-owned land that is within a mapped culturally sensitive area shall be disassembled by hand, then extracted using a helicopter. The sensitive area shall then be marked by a CRS in alignment with the guidance in MM CUL-1c (CRMP) and monitored in accordance with CUL-1d (Cultural Resources Monitoring), and MM CUL-1e (Tribal Monitoring).</p> | <p><b>Comment:</b> SCE proposes edits to clarify that mitigation measure CUL-1g should only apply to precontact NRHP/CRHR resources, rather than unidentified culturally sensitive areas. SCE’s revisions clarify that the mitigation measure CUL-1g is focused on non-destructive methods but does not limit the type of non-destructive methods that can be used. SCE’s edits also clarify that mitigation measure CUL-1g should only apply where feasible.</p> <p><b>Recommended Language:</b> “<b>MM CUL-1g Remove Structures by Helicopter in Culturally Sensitive Areas or other Non-destructive Method in NRHP/CRHR Resources.</b> At least 90 days prior to the start of construction of each of the Project segments (Segments 1, 2, 3N and 3S), <del>the CRS</del> SCE shall identify <del>culturally sensitive areas for the segment on detailed maps consultation with CPUC and consulting tribes,</del> where if feasible structures can be removed in a manner that reduces impacts to NRHP/CRHR resources. Any existing structures within the boundaries of a known precontact-era cultural resource on private or state-owned land <del>that is within a mapped culturally sensitive area</del> shall be disassembled <del>by hand</del> in a manner that does not impact the resource, then extracted using a helicopter, crane, or other manner that reduces impacts to the resource. The <del>sensitive area resource</del> shall then be marked by a CRS in alignment with the guidance in MM CUL-1ed (CRMP) and monitored in accordance with CUL-1de (Cultural Resources Monitoring), and MM CUL-1ef (Tribal Monitoring).”</p>   |

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| 52          | 3.6     | 3.6-64 | <p><b>MM CUL-1h Leave All Foundations in Place for Structures Removed in Culturally Sensitive Areas.</b></p> <p>Where structures within the boundaries of a known precontact-era cultural resource on private or state-owned land that is within a mapped culturally sensitive area are to be removed, SCE shall leave the structure foundations in place, so as to minimize disturbance of subsurface cultural materials and the existing landscape. SCE shall remove structures by cutting at ground level with foundations. No excavation of foundations will take place in these defined sensitive areas.</p> | <p><b>Comment:</b> SCE proposes adding language that clarifies that SCE will leave portions of the foundations in place where feasible and in compliance with other applicable regulations, including safety requirements.</p> <p><b>Recommended Language:</b> “<b>MM CUL-1h Leave All Foundations in Place for Structures Removed in Culturally Sensitive Areas-NRHP/CRHR.</b></p> <p>Where <u>feasible and in compliance with other applicable regulations, including safety regulations</u>, structures within the boundaries of a known precontact-era cultural resource on private or state-owned land that is NRHP/CRHR eligible <del>within a mapped culturally sensitive area are to be removed</del>, SCE shall <u>cut the foundation below grade to the necessary depth for safety and</u> leave the remaining structure foundations in place, so as to minimize disturbance of subsurface cultural materials and the existing landscape. <del>SCE shall remove structures by cutting ground level with foundations. No excavation of foundations will take place in these defined sensitive areas.</del>”</p> |

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| 53          | 3.6     | 3.6-64<br>– 3.6-65 | <p><b>MM CUL-1i Avoid Disturbance Within Environmentally Sensitive Areas.</b> SCE shall implement the following measures at and around a defined, confidential sensitive site:</p> <p>The existing structure within the site boundaries shall be removed without any ground disturbance and in accordance with CRMP requirements defined in MM CUL-1c, in consultation with Tribal monitors.</p> <p>No new structure will be placed within the site boundaries; the structures north and south of the site will be designed to span the site, with revised height and structure locations developed in accordance with CRMP requirements defined in MM CUL-1c, in consultation with Tribal monitors.</p> <p>The existing access road between the two structures remaining north and south of the sites shall be closed to all future use and shall be used for the Proposed Project with the minimum ground disturbance possible to allow removal of the existing structure. Closure design options shall be developed in consultation with Tribal monitors.</p> <p>Except as required for removal of the structure located within the site, SCE's access to the structures north and south of these sites shall be via access points north and south of the sites.</p> | <p><b>Comment:</b> Structure locations are not determined by construction personnel or monitors in the field. Location of structures is determined by SCE prior to construction. SCE's proposed language is intended to clarify this process. SCE also proposes edits that acknowledge that the use or non-use of a road must be determined in consultation with the landowner, LADWP.</p> <p><b>Recommended Language:</b> "<b>MM CUL-1i Avoid Disturbance Within Environmentally Sensitive Areas</b> <del>SWCA-L030-1056 and SWCA-L030-1056B</del>. SCE shall implement the following measures at and around <del>a defined, confidential sensitive site</del>, <u>SWCA-L030-1056 and SWCA-L030-1056B</u> where feasible:</p> <p>The existing structure within the site boundaries of <u>SWCA-L030-1056 and SWCA-L030-1056B</u> shall be removed <u>with minimal</u> <del>without any</del> ground disturbance and in accordance with CRMP requirements defined in MM CUL-1c<u>b</u>.</p> <p><del>No new structure will be placed within the site boundaries; the structures north and south of the site will be designed to span the site, with revised height and structure locations developed in accordance with CRMP requirements defined in MM CUL-1c, in consultation with Tribal monitors.</del></p> <p><u>If the proposed alignment is chosen as the preferred route, SCE will design the new line to span these resources.</u></p> <p>The existing access road <del>between the two structures remaining north and south of the sites shall be closed to all future use, and shall be used for the Proposed Project with the minimum ground disturbance possible to allow removal of the existing structure. In consultation with the landowner, SCE shall request the road be closed to future use. Closure design options shall be developed in consultation with Tribal monitors.</del></p> <p><del>Except as required for removal of the structure located within the site, SCE's access to the structures north and south of these sites shall be via access points north and south of the sites."</del></p> |
| 54          | 3.6     | 3.6-65             | <p><b>MM CUL-1j Mitigate Loss from Dismantling of Historic-Era "Tower Line" Transmission Lines (P-36-010316).</b> To mitigate the loss of this transmission line, SCE shall prepare a publication that describes the historical importance of the transmission line, the significant events and people associated with the transmission line, and the distinctive engineering and architectural characteristics attributed to the design of the transmission line. The publication shall be suitable for display or sale in local historic museums.</p>   | <p><b>Comment:</b> Portions of the line are located on BLM lands and therefore any mitigation must include consultation with the BLM and SHPO. SCE recommends adding language referencing these agencies.</p> <p><b>Recommended Language:</b> "<b>MM CUL-1j Mitigate Loss from Dismantling of Historic-Era "Tower Line" Transmission Lines (P-36-010316).</b> To mitigate the loss of this transmission line, SCE shall prepare <u>a treatment plan outlining the appropriate treatment to be implemented in consultation with the BLM, CPUC, and SHPO.</u> <u>Mitigation for the loss of these resources may will include the preparation of a publication that describes the historical importance of the transmission line, the significant events and people associated with the transmission line, and the distinctive engineering and architectural characteristics attributed to the design of the transmission line. The publication shall be suitable for display or sale in local historic museums."</u></p>   |

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| 55          | 3.6                               | 3.6-65                             | <p><b>MM CUL-1k Avoid and/or Mitigate Loss from Direct Impacts to Historic-Era Archaeological Resources Contributing to the Rand Mining District (P-15-007069).</b> For 14 contributors to the Rand Mining District, avoidance may not be feasible. SCE shall attempt to avoid these sites, but if avoidance is not feasible, data recovery will be completed in accordance with Mitigation Measure CUL-1c. Additional mitigation for the loss of these resources will include the preparation of a formal district form for the Rand Mining District and the identification of any previously recorded contributors.</p> <p>P-15-002500 □ SWCA-L030-1184 □ SWCA-L030-5153<br/>                     SWCA-L030-1168 □ SWCA-L030-1185 □ SWCA-L030-5154<br/>                     SWCA-L030-1173 □ SWCA-L030-5150 □ SWCA-L030-5155<br/>                     SWCA-L030-1174 □ SWCA-L030-5151 □ SWCA-L030-5161<br/>                     SWCA-L030-1177 □ SWCA-L030-5152</p>  | <p><b>Comment:</b> SCE suggests removing the references to data recovery and replacing it with a discussion of a treatment plan, as a treatment plan outlining the appropriate mitigation is more appropriate because it allows more flexibility for how to treat the resources. SCE also proposes adding language referencing the BLM as portions of the district and its contributors are located on BLM lands and any mitigation must include consolation with the BLM and SHPO.</p> <p><b>Recommended Language:</b> “<b>MM CUL-1k Avoid and/or Mitigate Loss from Direct Impacts to Historic-Era Archaeological Resources Contributing to the Rand Mining District (P-15-007069).</b> For the 14 contributors to the Rand Mining District within the ADI, avoidance may not be feasible. SCE shall attempt to avoid these sites, but if avoidance is not feasible, <u>SCE shall develop a treatment plan outlining the appropriate treatment/mitigation to be implemented in consultation with the BLM, CPUC and SHPO.</u> <del>data recovery will be completed in accordance with Mitigation Measure CUL-1c.</del> Additional Mitigation for the loss of these resources <u>may</u> <del>will</del> include the preparation of a formal district form for the Rand Mining District and the identification of any previously recorded contributors.”</p> <p>...</p>  |
| 56          | 3.6.3.5<br>&<br>3.6.4<br>&<br>7.7 | 3.6-65<br>&<br>3.6-69<br>&<br>7-48 | <p><b>Mitigation Measure CUL-1I Avoid Damage to Manzanar Airfield.</b> SCE shall not use Material Yard 1-10 (Manzanar Reward Road) if other material yards are available to support construction within Segment</p> <p>If use of any portion of the lands surrounding Manzanar Reward Road (east of US 395) cannot be avoided and is still proposed for use by SCE for a material yard, that use shall be constrained to areas and uses specifically identified in consultation with the National Park Service (NPS) staff at the Manzanar National Historic Site and with the landowner. No use shall be allowed that could result in damage to the historic features of the airfield features. SCE shall use other material yards in place of this y rd. If Material Yard 1-10 cannot be eliminated, SCE shall submit to the CPUC the following documentation at least 90 days before the start of construction on Segment 1: A detailed plan and map showing the area(s) that SCE would use for construction support and defining the specific uses of each area.</p> <p>Documentation of coordination with the NPS and with the landowner, showing the agreement of those parties to the uses proposed by SCE.</p> | <p><b>Comment:</b> The Proposed Material Yard at Manzanar Airfield has been removed from the Project, as indicated in SCE’s response to Data Request #18-3 on 11/21/2024. Therefore, SCE proposes removing any discussion associated with the proposed material yard at Manzanar Airfield.</p> <p><b>Recommended Language:</b> “<del>Mitigation Measure CUL-1I Avoid Damage to Manzanar Airfield. SCE shall not use Material Yard 1-10 (Manzanar Reward Road) if other material yards are available to support construction within Segment</del></p> <p><del>If use of any portion of the lands surrounding Manzanar Reward Road (east of US 395) cannot be avoided and is still proposed for use by SCE for a material yard, that use shall be constrained to areas and uses specifically identified in consultation with the National Park Service (NPS) staff at the Manzanar National Historic Site and with the landowner. No use shall be allowed that could result in damage to the historic features of the airfield features. SCE shall use other material yards in place of this y rd. If Material Yard 1-10 cannot be eliminated, SCE shall submit to the CPUC the following documentation at least 90 days before the start of construction on Segment 1: A detailed plan and map showing the area(s) that SCE would use for construction support and defining the specific uses of each area.</del></p> <p><del>Documentation of coordination with the NPS and with the landowner, showing the agreement of those parties to the uses proposed by SCE.”</del></p> |

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| 57          | 3.7     | 3.7-41 | <p><b>Mitigation Measure TCR-1a Conceal Exposed Tribal Cultural Resources After Construction.</b> Upon completion of construction activities on private or state-owned land, any exposed Tribal cultural resources shall be concealed to prevent looting. Tribal monitors shall be present for any concealment activities and shall be compensated for their monitoring efforts. The identification of native plants shall be consistent with the requirements developed in the <i>Habitat Restoration and Revegetation Plan</i> prepared in compliance with APM BIO-RES-1.</p> <p>Methods of concealment may include any of the following, as determined appropriate for the situation by a Tribal monitor:</p> <ul style="list-style-type: none"> <li>• Where feasible, relocate Tribal cultural resources to areas with less visibility.</li> <li>• Reposition objects within the natural environment, such as large rocks or fallen trees, to conceal Tribal cultural resources.</li> </ul> <p>Plant native plants to help conceal resources. Planting shall be in cooperation with consulting tribes, using tribal labor if feasible. Prioritize use of plants raised by consulting tribes, if available.</p> | <p><b>Comment:</b> SCE's revisions clarify that the process for concealing exposed tribal cultural resources after construction should be outlined and clearly defined in the <i>Habitat Restoration and Revegetation Plan</i> as activities and methods cannot be determined by individual monitors in the field.</p> <p>While SCE is responsible for restoring work areas, SCE does not relocate surface artifacts or natural materials such as rocks and trees, nor conceal resources outside of work areas. SCE's edits below reflect these changes.</p> <p><b>Recommended Language:</b> "<b>MM TCR-1a Conceal Exposed Tribal Cultural Resources After Construction.</b> Upon completion of construction activities on private or state-owned land, <u>all construction work areas shall be restored and revegetated, as they may have</u> any exposed Tribal cultural resources. <del>shall be concealed to prevent looting.</del> Tribal monitors shall be present for any <del>concealment</del> <u>restoration</u> activities and shall be compensated for their monitoring efforts. The <u>methods of restoration and revegetation including the</u> identification of native plants shall be consistent with the requirements developed in the <i>Habitat Restoration and Revegetation Plan</i> prepared in compliance with APM BIO-RES-1.</p> <p>Methods of <del>concealment</del> <u>restoration</u> may include any of the following, <del>as determined appropriate for the situation by a Tribal monitor:</del></p> <ul style="list-style-type: none"> <li><del>• Where feasible, relocate Tribal cultural resources to areas with less visibility.</del></li> <li><del>• Reposition objects within the natural environment, such as large rocks or fallen trees, to conceal Tribal cultural resources.</del></li> <li>• Plant native plants to help conceal resources. Planting shall be in cooperation with consulting tribes, using tribal labor if feasible. Prioritize use of plants raised by consulting tribes, if available.</li> </ul> <p><u>All work areas requiring tribal cultural resources consideration for restoration and revegetation activities shall be identified and included in the <i>Habitat Restoration and Revegetation Plan</i>.</u>"</p> |

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| 58          | 3.7     | 3.7-41 | <p><b>MM TCR-1b Provide Funding to Tribes for Research, Education, and Interpretation.</b> The Applicant shall create a fund with a deposit of \$150,000 to be managed by a third-party fund manager at a non-profit organization, to be distributed as grants to consulting tribes. Implementation of this measure is contingent on the identification of an appropriate non-profit grant managing entity. Each of the 18 AB 52 consulting tribe may apply for a grant for up to \$25,000. If the value of all grant applications exceeds the funding available, the third-party fund administrator may provide a pro-rated reduction in funding to the tribes providing grant applications.</p> <p>Grant funding shall be offered to all consulting tribes within 3 months of the start of Project construction, and (if funds remain available) again one and two years after the start of construction until funds are fully expended. The fund manager shall inform consulting tribes of the funds that are available at the start of each year and the process for applying for grants. The fund manager shall establish a 3-month period each year within which tribes may request grant funding.</p> <p>The third-party fund manager will hold, invest, and manage the funds, evaluate grant disperse money to grant recipients, and provide a financial report to SCE and CPUC on an annual basis at the end of each grant year.</p> <ul style="list-style-type: none"> <li>o The third-party fund manager shall provide to the CPUC and SCE the following: <ul style="list-style-type: none"> <li>A copy of the organization’s Articles of Incorporation and Bylaws.</li> <li>Self-certification that the entity is in good standing with the IRS and is exempt from income tax under IRS code sections 501(a) and 501(c)(3).</li> <li>A statement of the entity’s purpose, as it pertains to protection of lands and/or preservation of tribal resources; and <ul style="list-style-type: none"> <li>o The organization’s policies and guidelines for staff decisions concerning grant requests and disbursement.</li> <li>o The third-party fund manager shall develop a grant application request form for consulting tribes to complete. The application will explain the tribes’ proposed use of grant funds and explaining how or whether the funds would be used to study or protect resources within the Owens Valley Landscape.</li> </ul> </li> </ul> </li> </ul> | <p><b>Comment:</b> SCE proposes that the CPUC mitigation measure require the third-party administrator to consult with the CPUC.</p> <p><b>Recommended Language: “MM TCR-1b Provide Funding to Tribes for Research, Education, and Interpretation.</b> The Applicant shall create a fund with a deposit of \$150,000 to be managed by a third-party fund manager at a non-profit organization, to be distributed as grants to consulting tribes. Implementation of this measure is contingent on the identification of an appropriate non-profit grant managing entity. Each of the 18 AB 52 consulting tribe may apply for a grant for up to \$25,000. If the value of all grant applications exceeds the funding available, the third-party fund administrator <u>in consultation with the CPUC</u> may provide a pro-rated reduction in funding to the tribes providing grant applications.</p> <p>.....</p> <ul style="list-style-type: none"> <li>o The third-party fund manager shall develop a grant application request form for consulting tribes to complete, <u>which the CPUC shall review and approve.</u> The application will explain the tribes’ proposed use of grant funds and explaining how or whether the funds would be used to study or protect resources within the Owens Valley Landscape.”</li> </ul> |
| 59          | 3.9.3.3 | 3.9-40 | <p><b>Construction</b></p> <p>...<br/>However, in some areas, replacement structures would need to be installed along a new alignment approximately 50 feet to the east of the existing alignment, in order to provide continued service while the Project is being constructed.</p>  | <p><b>Comment:</b> The new alignment shifts to both the west and east of the existing and the distance from the existing varies, but will not exceed a maximum of 50 feet.</p> <p><b>Recommended Language:</b> “However, in some areas, replacement structures would need to be installed along a new alignment <u>adjacent</u> <del>approximately 50 feet to the east</del> of the existing alignment, in order to provide continued service while the Project is being constructed.”</p>  |

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| 60          | 3.11.3.3 | 3.11-21 | <p><b>Mitigation Measures for Impact HH-4 HH-4a Identify Soil Contamination (Supplements APM HAZ-2).</b> Prior to construction, SCE shall collect soil samples in construction areas that where the land has historically or is currently being used for agriculture or are in close proximity to the previous mines in Randsburg and would be subject to ground disturbance by the Project. SCE shall identify the possible presence of and delineate the extent of pesticide, herbicide, or mining-related contamination and provide results to the CPUC. If excavated project materials are found to contain elevated levels of pesticides/, herbicides, or arsenic or heavy metals (associated within mining tailings) they will require special handling and disposal procedures consistent with the requirements of APM HAZ-2 (Prepare a Soils Management Plan) and the CPUC shall be informed. As appropriate, SCE shall contact State, Inyo County, Kern County and San Bernardino County regulatory agencies to provide oversight regarding the handling, treatment, and/or disposal options. In the event pesticide/ herbicide or mining-related contamination is found, CPUC shall be notified and shall be kept apprised of the steps taken to address the problem.</p> | <p><b>Comment:</b> Because much of the Owens Valley has been historically used for agriculture, SCE proposes modifying the mitigation measure to focus soil sampling on areas where there is confirmed herbicide or pesticide use.</p> <p><b>Recommended Language:</b> “Prior to construction, SCE shall collect soil samples in construction areas that would be subject to ground disturbance by the Project <del>that</del> where the land <del>has historically or</del> is currently being used for agriculture, <u>and the current landowner confirms use of herbicides or pesticides,</u> or are in close proximity to the previous mines in Randsburg. <del>and would be subject to ground disturbance by the Project.</del> SCE shall identify the possible presence of <del>and delineate the extent of</del> pesticide<del>s</del>, herbicide, or mining-related contamination and provide results to the CPUC. If excavated project materials are found to contain elevated levels of pesticides/, herbicides <u>above regulatory thresholds,</u> or arsenic or heavy metals (associated within mining tailings) they will require special handling and disposal procedures consistent with the requirements of APM HAZ-2 (Prepare a Soils Management Plan) and the CPUC shall be informed. As appropriate, SCE shall contact State, Inyo County, Kern County and San Bernardino County regulatory agencies to provide oversight regarding the handling, treatment, and/or disposal options. In the event pesticide/ herbicide or mining-related contamination is found, CPUC shall be notified and shall be kept apprised of the steps taken to address the problem.”</p> |

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|-------------|----------|---------|---|---|
| 61          | 3.12.3.3 | 3.12-14 | <p><b>Mitigation Measure for Impact HW-1 HW-1a Drainage, Erosion, and Sedimentation Control Plan (DESCP).</b> Drainage, Erosion, and Sedimentation Control Plan (DESCP). At least 60 days prior to site mobilization, the Applicant shall submit to the Regional Water Quality Control Board, the BLM, and Inyo, Kern, and San Bernardino Counties for review and approval a DESCPC for managing stormwater during Project construction and operations. The DESCPC can be included in the Stormwater Pollution Prevention Plan (SWPPP) and must ensure proper protection of water quality and soil resources, address disturbed soil stabilization treatments in the Project area for both road and non-road surfaces, and identify all methods used for temporary and final stabilization of inactive areas.</p> <p>...</p> <p><i>Clearing and Grading Plans.</i> The DESCPC shall provide a delineation of all areas to be cleared of vegetation. The plan shall provide elevations, slopes, locations, and extent of all proposed grading as shown by contours, cross sections, or other means. The locations of any equipment and staging or laydown areas, fill areas, or other special features shall also be shown. Existing and proposed topography shall be illustrated by tying in proposed contours with existing topography.</p> <p>...</p> <p>The DESCPC may be part of the SWPPP and shall be kept onsite, kept updated, and readily available on request. The DESCPC and SWPPP must demonstrate compliance with other water quality permits which may have restrictions on types of erosion or sedimentation control materials used. SWPPP inspection reporting will be consistent with the requirements of the SWRCB Construction General Permit.</p> | <p><b>Comment:</b> The elements requested for in the DESCPC can be addressed through a project-specific SWPPP. For the I-C, SCE will ensure that one or more SWPPP(s) is/are prepared and approved that incorporate(s) drainage, erosion, and sediment control measures consistent with the DEIR mitigation requirements. The Construction General Permit allows these elements to be included in the SWPPP, which can be prepared by a QSD as required and submitted to the appropriate agencies. In this way, the SWPPP would satisfy the DESCPC requirements outlined in the DEIR. In addition, SCE does not expect to require grading plans for any construction sites, so there is no need to require the detailed information identified in the "Clearing and Grading Plans" subsection.</p> <p><b>Recommended Language:</b><br/> "Drainage, Erosion, and Sedimentation Control Plan (DESCPC). At least 60 days prior to site mobilization, the Applicant shall submit to the Regional Water Quality Control Board, the BLM, and Inyo, Kern, and San Bernardino Counties for review and approval a DESCPC for managing stormwater during Project construction and operations. The DESCPC can be <del>included in the</del> <u>incorporated and implemented through the project-specific Stormwater Pollution Prevention Plan (SWPPP)</u> and must ensure proper protection of water quality and soil resources, address disturbed soil stabilization treatments in the Project area for both road and non-road surfaces, and identify all methods used for temporary and final stabilization of inactive areas.</p> <p>...</p> <p><del><i>Clearing and Grading Plans.</i> The DESCPC shall provide a delineation of all areas to be cleared of vegetation. The plan shall provide elevations, slopes, locations, and extent of all proposed grading as shown by contours, cross sections, or other means. The locations of any equipment and staging or laydown areas, fill areas, or other special features shall also be shown. Existing and proposed topography shall be illustrated by tying in proposed contours with existing topography.</del></p> <p>...</p> <p>The DESCPC may be <del>part of the</del> <u>implemented through the</u> SWPPP and shall be kept onsite, kept updated, and readily available on request. The DESCPC and SWPPP must demonstrate compliance with other water quality permits which may have restrictions on types of erosion or sedimentation control materials used. SWPPP inspection reporting will be consistent with the requirements of the SWRCB Construction General Permit."</p> |

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|-------------|----------|---------|--|---|
| 62          | 3.12.3.3 | 3.12-14 | <p><b>Impacts and Mitigation Measures</b></p> <p>...</p> <p><b>Construction</b></p> <p>...</p> <p>Construction or earth moving activities including vegetation removal, rehabilitation of existing access roads, and construction of new spur roads have the potential to create stormwater runoff during rain events and violate water quality standards. With the implementation of BMPs from the SWPPPs required under the state construction stormwater permit program, and compliance with terms and conditions of other required permits (including ministerial grading permits), the Proposed Project would not violate water quality standards or applicable waste discharge requirements associated with construction activities.</p> | <p><b>Comment:</b> General Order 131-E explains that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to the Commission's Jurisdiction. Therefore, if a local jurisdiction includes local requirements in ministerial permits, then SCE would not be required to obtain those permits. SCE proposes adding the word "applicable" to clarify which ministerial permits SCE would obtain.</p> <p><b>Recommended Language:</b> "Construction or earth moving activities including vegetation removal, rehabilitation of existing access roads, and construction of new spur roads have the potential to create stormwater runoff during rain events and violate water quality standards. With the implementation of BMPs from the SWPPPs required under the state construction stormwater permit program, and compliance with terms and conditions of other required permits (including <u>applicable</u> ministerial grading permits), the Proposed Project would not violate water quality standards or applicable waste discharge requirements associated with construction activities."</p> |

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|-------------|----------|---------|---|---|
| 63          | 3.12.3.3 | 3.12-19 | <p><b>Substantially Increase the Rate or Amount of Surface Runoff in a Manner That Would Result in Flooding On- or Off-site Construction. LESS THAN SIGNIFICANT WITH MITIGATION.</b> As stated previously, the Proposed Project would result in a minor increase in impervious surface (total estimated less than 1 acre of new impervious surfaces) compared with existing conditions, and vegetation removal and grading would result in minor changes to drainage patterns.</p> <p>...</p> <p>SCE would be required to implement, and has committed to the implementation of, the project SWPPP and its requirements to minimize erosion and control runoff and APM WET-1 (Avoid and/or Minimize Impacts to Jurisdictional Waters, Wetlands, and Riparian Habitats). However, the implementation of the SWPPP and APM would not reduce the potential impacts for localized flooding to less than significant levels due the nature and extent of construction activities along the 262-mile ROW of the Proposed Project. The extent of this Project requires development of a more specific plan for erosion and runoff control. Therefore, the impact would be significant without mitigation. Mitigation Measure HW-1a (Drainage, Erosion, and Sedimentation Control Plan) requires preparation of a detailed plan, to be reviewed for completeness by the CPUC. Implementation of this plan would ensure that the Proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or a substantial increase in the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Therefore, Impact HW-3b would be less than significant with mitigation.</p> <p>...</p> | <p><b>Comment:</b> The Draft EIR concludes that impacts related to surface runoff and flooding would be less than significant with mitigation, however, the document does not include supporting analysis demonstrating that the I-C Project would substantially increase the rate or amount of surface runoff or result in on- or off-site flooding. Moreover, the mitigation measure referenced does not specifically address flooding impacts. Based on the Project’s minimal increase in impervious surface area and only minor changes to drainage patterns, which indicates no significant change in runoff or flooding conditions, additional mitigation does not appear to be warranted.</p> <p>Under CEQA, “[m]itigation measures are not required for effects which are not found to be significant.” CEQA Guidelines § 15126.4(a)(3). When mitigation is imposed, CEQA requires that the lead agency limit the scope of the mitigation to match the nature of the impact. CEQA Guidelines § 15126.4(a)(4)</p> <p>As proposed, Mitigation Measure HW-1a would impose substantial costs and effort on SCE that are not connected to or roughly proportional to the nature of the impact. Therefore SCE recommends the impact be revised to less than significant, the analysis be revised, and Mitigation Measure HW-1a removed.</p> <p><b>Recommended Language: “Substantially Increase the Rate or Amount of Surface Runoff in a Manner That Would Result in Flooding On- or Off-site Construction. LESS THAN SIGNIFICANT WITH MITIGATION.</b> As stated previously, the Proposed Project would result in a minor increase in impervious surface (total estimated less than 1 acre of new impervious surfaces) compared with existing conditions, and vegetation removal and grading would result in minor changes to drainage patterns.</p> <p>SCE would be required to implement, and has committed to the implementation of, the project SWPPP and its requirements to minimize erosion and control runoff and APM WET-1 (Avoid and/or Minimize Impacts to Jurisdictional Waters, Wetlands, and Riparian Habitats). However, the implementation of the SWPPP and APM would not reduce the potential impacts for localized flooding to less than significant levels due the nature and extent of construction activities along the 262-mile ROW of the Proposed Project. The extent of this Project requires development of a more specific plan for erosion and runoff control. Therefore, the impact would be significant without mitigation. Mitigation Measure HW-1a (Drainage, Erosion, and Sedimentation Control Plan) requires preparation of a detailed plan, to be reviewed for completeness by the CPUC. Implementation of this plan would ensure that the Proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or a substantial increase in the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Therefore, Impact HW-3b would be less than significant with mitigation.”</p> |

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| 64          | 3.12.3.3<br>&<br>3.12.4 | 3.12-14<br>&<br>3.12-22 | <p><b>HW-1a and Table 3.12-2</b></p> <p><b>HW-1a Drainage, Erosion, and Sedimentation Control Plan (DESCP).</b> At least 60 days prior to site mobilization, the Applicant shall submit to the Regional Water Quality Control Board, the BLM, and Inyo, Kern, and San Bernardino Counties for review and approval a DESC<del>P</del> for managing stormwater during Project construction and operations. The DESC<del>P</del> can be included in the Stormwater Pollution Prevention Plan (SWPPP) and must ensure proper protection of water quality and soil resources, address disturbed soil stabilization treatments in the Project area for both road and non-road surfaces, and identify all methods used for temporary and final stabilization of inactive areas. The plan must also cover all linear Project features and any other Project components subject to disturbance. The DESC<del>P</del> shall contain, at a minimum, the elements presented below that outline site management activities and erosion and sediment-control Best Management Practices</p> | <p><b>Comment:</b> SCE suggests clarifying that SCE will implement the DESC<del>P</del> as part of the Project specific SWPPP. SCE will provide one or more SWPPP(s) that incorporate drainage, erosion, and sediment control measures consistent with the DEIR mitigation requirements. The Construction General Permit allows these elements to be included in the SWPPP, which can be prepared by a QSD as required and submitted to the appropriate agencies. In this way, the SWPPP would satisfy the DESC<del>P</del> requirements outlined in the DEIR.</p> <p><b>Recommended Language:</b> “<b>HW-1a Drainage, Erosion, and Sedimentation Control Plan (DESCP).</b> At least 60 days prior to site mobilization, the Applicant shall submit to the Regional Water Quality Control Board, the BLM, and Inyo, Kern, and San Bernardino Counties for review and approval a DESC<del>P</del> for managing stormwater during Project construction and operations. The DESC<del>P</del> can be <del>included</del> <u>incorporated</u> in the Stormwater Pollution Prevention Plan(s) (SWPPP) and must ensure proper protection of water quality and soil resources, address disturbed soil stabilization treatments in the Project area for both road and non-road surfaces, and identify all methods used for temporary and final stabilization of inactive areas. The plan must also cover all linear Project features and any other Project components subject to disturbance. The DESC<del>P</del> shall contain, at a minimum, the elements presented below that outline site management activities and erosion and sediment-control Best Management Practices</p> <p>The DESC<del>P</del> may be <del>part of</del> <u>implemented through one or more SWPPP(s)</u> and shall be kept onsite, kept updated, and readily available on request. The DESC<del>P</del> and SWPPP must demonstrate compliance with other water quality permits which may have restrictions on types of erosion or sedimentation control materials used. SWPPP inspection reporting will be consistent with the requirements of the SWRCB Construction General Permit.”</p> |
| 65          | 3.15                    | 3.15-16                 | <p><b>Helicopters</b></p> <p>...</p> <p>SCE has proposed implementation of APM NOI-1, which requires construction activities to occur during daytime construction hours in accordance with the local noise standards. It also requires that helicopter flights be routed away from residences and schools, where feasible. Even with implementation of APM NOI-1, the noise from helicopter use would be substantial at receptors adjacent to material yards and landing zones where helicopter use would be continuous for months. The noise impact from helicopter use would be significant and requires mitigation to reduce its severity.</p> <p>...</p>   | <p><b>Comment:</b> General Order 131-E explains that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to the Commission's Jurisdiction. SCE suggests retaining the language of SCE's APM which acknowledges the language of General Order 131-E.</p> <p><b>Recommended Language:</b> “SCE has proposed implementation of APM NOI-1, which requires construction activities to occur during daytime construction hours <u>to the extent feasible</u>, in accordance with the local noise standards.”</p>   |

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|-------------|----------|---------|--|--|
| 66          | 3.15     | 3.15-17 | <p><b>Mitigation Measure for Impact N-1 N-1a Implement Helicopter Noise Control Strategy.</b> SCE shall prepare and implement a Helicopter Use Plan that includes a helicopter noise control strategy in the final Helicopter Use Plan. The noise control strategy shall include definition of helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (greater than 15 minutes) within 250 feet of residences or schools in any vertical or horizontal direction. Helicopter use shall be limited to the hours of 7 a.m. to 7 p.m. Monday through Friday. The Helicopter Use Plan, including the noise control strategy, shall be provided to the CPUC for review at least 60 days prior to helicopter activities</p> | <p><b>Comment:</b> SCE requests that the CPUC revise the language of Mitigation Measure N-1a to include flexibility for helicopter work to occur at night or on the weekend .The need for weekend or night work is dependent on several factors which include outage restrictions and permit conditions, the details of which are unknown at this time. This revision is consistent with the language and analysis in Section 3.15.3.3</p> <p><b>Recommended Language:</b> “<b>MM N-1a Implement Helicopter Noise Control Strategy.</b> SCE shall prepare and implement a Helicopter Use Plan that includes a helicopter noise control strategy in the final Helicopter Use Plan. The noise control strategy shall include definition of helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (greater than 15 minutes) within 250 feet of residences or schools in any vertical or horizontal direction. <del>Helicopter use shall be limited to the hours of 7 a.m. to 7 p.m. Monday through Friday.</del> <u>As stated in the Project Description, construction would generally be performed from 7:00 a.m. and 7:00 p.m., Monday through Saturday; however, at limited times some construction may be required or finished after these hours, and on Sundays. The need to complete work at night or on Sunday is dependent on several factors which include outage restrictions, and permit conditions, which are unknown at this time.</u> The Helicopter Use Plan, including the noise control strategy, shall be provided to the CPUC for review at least 60 days prior to helicopter activities <u>should identify helicopter noise control strategies, including, but not limited to, the establishment of helicopter flight corridors and minimum transit elevations above ground level to minimize impacts to noise-sensitive receptors during night or Sunday hours.</u>”</p> |
| 67          | 3.16.2.3 | 3.16-3  | <p><b>Local Regulations, Policies and Standards</b></p> <p>...<br/>Local plans are considered by the CPUC in determining the Proposed Project’s consistency with local plans, goals, and policies. As the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of public utilities on non-federal lands in the state, no local discretionary permits (e.g., conditional use permits) or local plan consistency evaluations are required for the Proposed Project. However, SCE would be required to obtain all ministerial building and encroachment permits from local jurisdictions.</p>   | <p><b>Comment:</b> SCE does not anticipate obtaining any building permits for the I-C Project and therefore suggests removing the reference to building permits.</p> <p>General Order 131-E, explains that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to the Commission's Jurisdiction. Therefore, if a local jurisdiction includes local discretionary requirements in ministerial permits, then SCE would not be required to obtain those permits. SCE proposes adding the word “applicable” to clarify which ministerial permits SCE would obtain.</p> <p><b>Recommended Language:</b> “Local plans are considered by the CPUC in determining the Proposed Project’s consistency with local plans, goals, and policies. As the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of public utilities on non-federal lands in the state, no local discretionary permits (e.g., conditional use permits) or local plan consistency evaluations are required for the Proposed Project. However, SCE would be required to obtain all <u>applicable</u> ministerial <del>building and</del> encroachment permits from local jurisdictions.”</p>  |

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|-------------|----------|---------|--|--|
| 68          | 3.18.3.4 | 3.18-18 | <p><b>Manzanar NHS. LESS THAN SIGNIFICANT WITH MITIGATION.</b> This site, which is listed in Table 3.18-1, is an important destination for visitors wanting to learn about the Japanese internment during World War II, as well as for family members of internees. The internment and residential area of Manzanar and the current visitor center are located approximately one mile west of the Proposed Project ROW.</p> <p>...</p> <p>Construction at the staging area could result in a visible disturbance due to dust. Fugitive dust would be controlled by measures required by the Great Basin Unified Air Pollution Control District, as a condition of a permit from the District. However, due to the distance between construction areas and the Manzanar NHS, dust would not cause a significant disruption. Implementation of Mitigation Measure AQ-2b (Control Fugitive Dust Emissions) would further reduce the Proposed Project's less than significant disturbance effects by requiring implementation of specific measures to prevent dust.</p> <p>Construction traffic would not affect the ability of Manzanar visitors to access the NHS, since the staging area is across the highway from the historic site. In conclusion, recreation impacts to Manzanar Historic Site would be less than significant with implementation of Mitigation Measure N-1a (Helicopter Noise Control Strategy; superseding APM NOI-1) and Mitigation Measure AQ-2b (Control Fugitive Dust Emissions).</p> | <p><b>Comment:</b> Under CEQA, "mitigation measures are not required for effects which are not found to be significant." CEQA Guidelines § 15126.4(a)(3). The DEIR states that dust related impacts to the Manzanar NHS would be less than significant, but goes on to impose Mitigation Measure AQ-2b to "further reduce the Proposed Project's less than significant impact."</p> <p>Mitigation measures should only be applied to reduce significant environmental impacts, not to "further reduce" less than significant impacts. As such, SCE recommends the CPUC remove discussion of Mitigation Measure AQ-2b from this section.</p> <p><b>Recommended Language: "Manzanar NHS. LESS THAN SIGNIFICANT WITH MITIGATION.</b> This site, which is listed in Table 3.18-1, is an important destination for visitors wanting to learn about the Japanese internment during World War II, as well as for family members of internees. The internment and residential area of Manzanar and the current visitor center are located approximately one mile west of the Proposed Project ROW.</p> <p>...</p> <p>Construction at the staging area could result in a visible disturbance due to dust. Fugitive dust would be controlled by measures required by the Great Basin Unified Air Pollution Control District, as a condition of a permit from the District. However, due to the distance between construction areas and the Manzanar NHS, dust would not cause a significant disruption. <del>Implementation of Mitigation Measure AQ-2b (Control Fugitive Dust Emissions) would further reduce the Proposed Project's less than significant disturbance effects by requiring implementation of specific measures to prevent dust.</del></p> <p>Construction traffic would not affect the ability of Manzanar visitors to access the NHS, since the staging area is across the highway from the historic site. In conclusion, recreation impacts to Manzanar Historic Site would be less than significant with implementation of Mitigation Measure N-1a (Helicopter Noise Control Strategy; superseding APM NOI-1) and <del>Mitigation Measure AQ-2b (Control Fugitive Dust Emissions).</del>"</p> |

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|-------------|----------|-----------------------|---|--|
| 69          | 3.19.1   | 3.19-6<br>&<br>3.19-7 | <p><b>Railroad</b><br/>There are no active rail lines in the vicinity of Segment 3N.</p> <p>There are no active rail lines in the vicinity of Segment 3S.</p>   | <p><b>Comment:</b> Both Segments 3N and 3S cross active rail lines. SCE requests correction of language on Segment 3N and addition of language indicating additional railroad crossings are expected in Segment 3S.</p> <p><b>Recommended Language:</b></p> <ul style="list-style-type: none"> <li>▪ Segment 3N would have multiple crossings, <del>located at the Barstow rail switchyard located just west of Barstow</del> one located immediately west of Coolwater Substation and another crossing at Highway 58 and Highway 395 at Kramer Junction.</li> <li>▪ Segment 3S would have multiple crossings, including five crossings located at the Barstow Rail Yard and two crossings immediately south of Coolwater Substation.</li> </ul>   |
| 70          | 3.19.3.3 | 3.19-20               | <p><b>Construction</b><br/>...</p> <p>As listed in Table 3.19-6, SCE has included APM TRA-1 to include construction activities completed within public-street ROWs that would require the use of a traffic control service, and any lane closures would be conducted consistent with local ordinances and ministerial city permit conditions.</p> | <p><b>Comment:</b> General Order 131-E explains that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to the Commission's Jurisdiction. Therefore, if a local jurisdiction includes local requirements in ministerial permits, then SCE would not be required to obtain those permits. SCE proposes adding the word "applicable" to clarify which ministerial permits SCE would obtain.</p> <p><b>Recommended Language:</b> "As listed in Table 3.19-6, SCE has included APM TRA-1 to include construction activities completed within public-street ROWs that would require the use of a traffic control service, and any lane closures would be conducted consistent with <u>applicable</u> local ordinances and ministerial city permit conditions."</p> |
| 71          | 4.3.4.1. | 4-9                   | <p><b>SCE Discussion of the No Project Alternative</b><br/>...</p> <p>As described by SCE, in the PEA and in Section 1, there is a well-defined need to implement the mitigation plan previously agreed to with the WECC and to improve the reliability of the I-C lines due to their age and deteriorated condition.</p>                         | <p><b>Comment:</b> SCE proposes the language below to clarify that the purpose of the TLRR Program and the I-C Project is to remediate clearance discrepancies along the I-C Project lines and that discrepancies may exist regardless of infrastructure age or condition.</p> <p><b>Recommended Language:</b> "As described by SCE, in the PEA and in Section 1, there is a well-defined need to implement the mitigation plan previously agreed to with the WECC to <u>eliminate clearance discrepancies and</u> improve the reliability of the I-C lines <u>due to their age and deteriorated condition.</u>"</p>   |

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|-------------|---------|------|---|---|
| 72          | 4.3.4.1 | 4-10 | <p><b>SCE Discussion of the No Project Alternative</b></p> <p>...</p> <p>The range of predictable 'no project' consequences could also include targeted repairs to address problems on a case-by-case basis or in response to emergencies arising from the continuing discrepancies of the existing facilities. If the Proposed Project is not approved by the CPUC, it is reasonable to assume that SCE could be required to implement targeted upgrades in response to emergency situations. These upgrades would likely be narrower in scope than those anticipated with the Proposed Project; however, mitigation measures identified for the Proposed Project would not be adopted under the No Project Alternative.</p> | <p><b>Comment:</b> There is no guarantee that upgrades would be exempt from licensing or that all discrepancies would be remediated through targeted upgrades in response to emergencies. SCE proposes the revisions below to clarify the impacts of selecting the No Project Alternative.</p> <p><b>Recommended Language:</b> The range of predictable 'no project' consequences could also include targeted repairs to address problems on a case-by-case basis or in response to emergencies arising from the continuing discrepancies of the existing facilities. If the Proposed Project is not approved by the CPUC, it is reasonable to assume that SCE could be required to implement targeted upgrades in response to emergency situations. <u>Some upgrades could be subject to licensing under GO 131-E. These targeted upgrades would likely be narrower in scope than those anticipated with the Proposed Project; however, mitigation measures identified for the Proposed Project would not be adopted under the No Project Alternative. Even if discrepancies were remediated over time through emergency work, these upgrades would not address the larger system reliability issues because the line(s) would not be re-rated until all discrepancies are remediated. SCE would remain out of compliance with CPUC, WECC, and NERC requirements and guidance until that time.</u></p> |
| 73          | 4.3.4.2 | 4-10 | <p><b>No Project Alternative Scenario for this EIR</b></p> <p>...</p> <p>In the No Project Alternative, some of the isolated modifications of the existing electrical system included in the proposed I-C Project could be implemented as exempt actions. In these situations, SCE could implement these physical modifications to remediate discrepancies consistent with the exemptions identified in GO 131-E Section III.B.1. However, this type of modification would be challenging in areas with known sensitive resources (e.g., the cultural resources along portions of Segment 1). In these areas, modifications may not be possible without a formal application to the CPUC and CEQA documentation.</p>          | <p><b>Comment:</b> There is no guarantee that upgrades would be exempt from licensing or that discrepancies would be remediated through targeted upgrades in response to emergencies. SCE proposes the revisions below to clarify the impacts of selecting the No Project Alternative.</p> <p><b>Recommended Language:</b> "In the No Project Alternative, <u>it is possible that</u> some of the isolated modifications of the existing electrical system included in the proposed I-C Project could be implemented as exempt actions. In these situations, SCE could implement these physical modifications to remediate <u>isolated</u> discrepancies consistent with the exemptions identified in GO 131-E Section III.B.1. However, this type of modification would be challenging in areas with known sensitive resources (e.g., the cultural resources along portions of Segment 1). In these areas, modifications may not be possible without a formal application to the CPUC and CEQA documentation. <u>In this scenario, SCE would remain out of compliance with CPUC, WECC, and NERC safety and reliability requirements until all discrepancies have been remediated.</u>"</p>   |

**Ivanpah-Control 115 kV TLRR Subtransmission Project**

**DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS**

| Comment No.  | Section                                      | Page  | DEIR Original Language   | SCE Recommended Language   |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
|--|--|---|--|--|--|---|---|-----------|------------------------------------|----------------------------------|-----------|------------------------------------|--------------------------------------|-----------|------------------------------------|--------------------------------|------------------|---|--|--|--|---|---|--------------------------------|--|----------------------------------|---------------------------------|--|--------------------------------------|--------------------------------|---|--------------------------------|--|---|
| 74   | 4.5.1  | 4-18  | <p>Table 4-2. Ground Disturbance for Alternatives as Compared with Proposed Project Segments</p> <table border="1"> <thead> <tr> <th data-bbox="531 425 997 552">Table 4-2. Ground Disturbance for Alternatives as Compared with Proposed Project Segments Alternative Name</th> <th data-bbox="997 459 1370 520">Ground Disturbance: Proposed Project Segment</th> <th data-bbox="1370 459 1712 520">Ground Disturbance: Alternative Segment</th> </tr> </thead> <tbody> <tr> <td data-bbox="531 572 997 612">Crater Mountain Realignment Alternative</td> <td data-bbox="997 572 1370 612">113 acres</td> <td data-bbox="1370 560 1712 620">159 acres (40% more than proposed)</td> </tr> <tr> <td data-bbox="531 633 997 673">Manzanar Realignment Alternative</td> <td data-bbox="997 633 1370 673">225 acres</td> <td data-bbox="1370 620 1712 681">390 acres (73% more than proposed)</td> </tr> <tr> <td data-bbox="531 693 997 733">Fossil Falls Realignment Alternative</td> <td data-bbox="997 693 1370 733">117 acres</td> <td data-bbox="1370 681 1712 741">228 acres (95% more than proposed)</td> </tr> <tr> <td data-bbox="531 753 997 794"><b>Total: All Alternatives</b></td> <td data-bbox="997 753 1370 794"><b>455 acres</b></td> <td data-bbox="1370 741 1712 802"><b>777 acres (71% more than proposed)</b></td> </tr> </tbody> </table> | Table 4-2. Ground Disturbance for Alternatives as Compared with Proposed Project Segments Alternative Name | Ground Disturbance: Proposed Project Segment | Ground Disturbance: Alternative Segment | Crater Mountain Realignment Alternative | 113 acres | 159 acres (40% more than proposed) | Manzanar Realignment Alternative | 225 acres | 390 acres (73% more than proposed) | Fossil Falls Realignment Alternative | 117 acres | 228 acres (95% more than proposed) | <b>Total: All Alternatives</b> | <b>455 acres</b> | <b>777 acres (71% more than proposed)</b> | <p><b>Comment:</b> The numbers presented in Table 4-2 are out of date. SCE proposes revising the table below to reflect the reduced areas of ground disturbance resulting from updated engineering analyses.</p> <p><b>Recommended Language:</b></p> <table border="1"> <thead> <tr> <th data-bbox="2032 586 2405 721">Table 4-2. Ground Disturbance for Alternatives as Compared with Proposed Project Segments Alternative Name</th> <th data-bbox="2405 600 2716 681">Ground Disturbance: Proposed Project Segment</th> <th data-bbox="2716 600 2996 681">Ground Disturbance: Alternative Segment</th> </tr> </thead> <tbody> <tr> <td data-bbox="2032 741 2405 814">Crater Mountain Realignment Alternative</td> <td data-bbox="2405 753 2716 794"><u>94</u> <del>113</del> acres</td> <td data-bbox="2716 721 2996 814"><u>89</u> <del>159</del> acres (<u>5% less</u> <del>40% more than</del> proposed)</td> </tr> <tr> <td data-bbox="2032 854 2405 895">Manzanar Realignment Alternative</td> <td data-bbox="2405 854 2716 895"><u>179</u> <del>225</del> acres</td> <td data-bbox="2716 814 2996 915"><u>151</u> <del>390</del> acres (<u>16% less</u> <del>73% more than</del> proposed)</td> </tr> <tr> <td data-bbox="2032 915 2405 987">Fossil Falls Realignment Alternative</td> <td data-bbox="2405 927 2716 967"><u>97</u> <del>117</del> acres</td> <td data-bbox="2716 915 2996 975"><u>111</u> <del>228</del> acres (<u>14%</u> <del>95%</del> more than proposed)</td> </tr> <tr> <td data-bbox="2032 1008 2405 1048"><b>Total: All Alternatives</b></td> <td data-bbox="2405 1008 2716 1048"><b><u>370</u> <del>455</del> acres</b></td> <td data-bbox="2716 975 2996 1076"><b><u>351</u> <del>777</del> acres (<u>5% less</u> <del>71% more than</del> proposed)</b></td> </tr> </tbody> </table> | Table 4-2. Ground Disturbance for Alternatives as Compared with Proposed Project Segments Alternative Name | Ground Disturbance: Proposed Project Segment | Ground Disturbance: Alternative Segment | Crater Mountain Realignment Alternative | <u>94</u> <del>113</del> acres | <u>89</u> <del>159</del> acres ( <u>5% less</u> <del>40% more than</del> proposed) | Manzanar Realignment Alternative | <u>179</u> <del>225</del> acres | <u>151</u> <del>390</del> acres ( <u>16% less</u> <del>73% more than</del> proposed) | Fossil Falls Realignment Alternative | <u>97</u> <del>117</del> acres | <u>111</u> <del>228</del> acres ( <u>14%</u> <del>95%</del> more than proposed) | <b>Total: All Alternatives</b> | <b><u>370</u> <del>455</del> acres</b> | <b><u>351</u> <del>777</del> acres (<u>5% less</u> <del>71% more than</del> proposed)</b> |
| Table 4-2. Ground Disturbance for Alternatives as Compared with Proposed Project Segments Alternative Name | Ground Disturbance: Proposed Project Segment | Ground Disturbance: Alternative Segment   |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
| Crater Mountain Realignment Alternative  | 113 acres                                    | 159 acres (40% more than proposed)  |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
| Manzanar Realignment Alternative   | 225 acres                                    | 390 acres (73% more than proposed)  |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
| Fossil Falls Realignment Alternative   | 117 acres                                    | 228 acres (95% more than proposed)  |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
| <b>Total: All Alternatives</b>   | <b>455 acres</b>                             | <b>777 acres (71% more than proposed)</b>   |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
| Table 4-2. Ground Disturbance for Alternatives as Compared with Proposed Project Segments Alternative Name | Ground Disturbance: Proposed Project Segment | Ground Disturbance: Alternative Segment   |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
| Crater Mountain Realignment Alternative  | <u>94</u> <del>113</del> acres               | <u>89</u> <del>159</del> acres ( <u>5% less</u> <del>40% more than</del> proposed)        |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
| Manzanar Realignment Alternative   | <u>179</u> <del>225</del> acres              | <u>151</u> <del>390</del> acres ( <u>16% less</u> <del>73% more than</del> proposed)      |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
| Fossil Falls Realignment Alternative   | <u>97</u> <del>117</del> acres               | <u>111</u> <del>228</del> acres ( <u>14%</u> <del>95%</del> more than proposed)           |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |
| <b>Total: All Alternatives</b>   | <b><u>370</u> <del>455</del> acres</b>       | <b><u>351</u> <del>777</del> acres (<u>5% less</u> <del>71% more than</del> proposed)</b> |  |  |  |   |   |           |                                    |                                  |           |                                    |                                      |           |                                    |                                |                  |   |  |  |  |   |   |                                |  |                                  |                                 |  |                                      |                                |   |                                |  |   |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

## DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

| Comment No. | Section | Page | DEIR Original Language   | SCE Recommended Language  |
|-------------|---------|------|--|---|
| 75          | 4.5.2   | 4-22 | <p><b>4.5.2. Comparison of the Proposed Project with the No Project Alternative</b><br/>                     The No Project Alternative would result in avoidance of the concentrated short-term construction impacts of replacing all subtransmission facilities in Segments 1 and 2, and replacement of isolated facilities along Segments 3N and 3S on the schedule defined in Chapter 2. However, the No Project Alternative would result in the need to replace individual facilities on an as-needed basis, resulting in similar, but less efficient, replacement of facilities, which would be completed without implementation of the mitigation measures defined in this EIR.</p> | <p><b>Comment:</b> The No Project Alternative evaluates the consequences of not approving the I-C Project. Selecting the No Project Alternative would mean that SCE would not implement the I-C Project and therefore would neither remediate clearance discrepancies nor bring the lines into compliance with GO 95 and North American Electric Reliability Corporation (NERC) Facility Ratings. Additionally, it would mean that SCE would be out of compliance with the mitigation plan submitted to and agreed upon with WECC.</p> <p>Under this scenario, no construction or modifications to the existing electrical infrastructure would occur and all existing line clearance discrepancies would remain on SCE's system. It is possible that SCE could address the line clearance discrepancies on an individual basis but this approach would likely result in an inefficient and disjointed method of remediation, and would likely be limited to activities permitted under SCE's existing land rights. Selecting the No Project Alternative would result in ongoing impacts system reliability would likely result in ongoing frequent operations and maintenance work along the existing lines.</p> <p><b>Recommended Language:</b><br/>                     "The No Project Alternative would result in avoidance of the concentrated short-term construction impacts of replacing all subtransmission facilities in Segments 1 and 2, and replacement of isolated facilities along Segments 3N and 3S on the schedule defined in Chapter 2. However, <u>if the No Project Alternative were selected, SCE would neither remediate clearance discrepancies nor bring the lines into compliance with GO 95 and NERC Facility Ratings. Additionally, it would mean that SCE would be out of compliance with the mitigation plan submitted to and agreed upon with WECC. SCE would need to replace conductor and towers to remediate discrepancies, individual facilities but this work would likely be completed on an emergency as-needed basis, resulting in similar, but less efficient, replacement of facilities, which would be completed without implementation of the mitigation measures defined in this EIR. Even if discrepancies were remediated through emergency work, system reliability issues would persist because the lines would not be re-rated until all discrepancies are remediated.</u>"</p> |
| 76          | 5.3.15  | 5-35 | <p><b>Noise</b><br/>                     As discussed in Section 3.15, the Proposed Project would have a less than significant impact with mitigation from generation of a substantial temporary increase in noise levels due to helicopter use during construction. The Proposed Project construction would be conducted during daytime hours when construction noise is exempt under local noise ordinances.</p>   | <p><b>Comment:</b> This language should be removed to be consistent with the language in MM N-1a which would allow for flexibility to perform appropriate helicopter work.</p> <p><b>Recommended Language:</b> "As discussed in Section 3.15, the Proposed Project would have a less than significant impact with mitigation from generation of a substantial temporary increase in noise levels due to helicopter use during construction. <del>The Proposed Project construction would be conducted during daytime hours when construction noise is exempt under local noise ordinances.</del>"</p>   |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

## DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

| Comment No. | Section  | Page | DEIR Original Language  | SCE Recommended Language   |
|-------------|----------|------|---|--|
| 77          | 5.3.15.2 | 5-37 | <p><b>Cumulative Analysis</b></p> <p>...</p> <p>The permitting process normally requires each project to comply with local standards and to avoid noise-related land use conflicts. This means that all projects, even if unrelated to the proposed Project, would need to comply with the local community noise standards.</p>   | <p><b>Comment:</b> The California Public Utilities Commission (CPUC) has sole and exclusive state jurisdiction over the siting and design of the I-C Project. Pursuant to CPUC General Order 131-E, local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the CPUC's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters. Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the counties' and cities' regulations are not applicable as the counties and cities do not have jurisdiction over the I-C Project.</p> <p><b>Recommended Language:</b> "The permitting process normally requires each project to comply with local standards and to avoid noise-related land use conflicts. This means that all projects, even if unrelated to the proposed Project, would <del>need to</del> comply with the local community noise standards, <u>to the extent feasible.</u>"</p>  |
| 78          | 7.7      | 7-14 | <p><b>Bighorn Sheep – Nelson's /Desert Bighorn Sheep.</b> Prior to initial ground-disturbing activities, a qualified biologist will conduct surveys within 2 miles from construction work areas identified as habitat (as described in the TLRR Habitat and Sensitive Species Reports for Control-Haiwee and Ivanpah-Coolwater-Kramer-Inyokern) for bighorn sheep during the peak lambing period Feb-May. During construction, monitoring by a qualified biologist will be implemented in occupied areas within the range of BHS between Feb 1 – Sept 30. The biological monitors will halt construction activities if BHS are within 500 feet of work areas or display signs of disturbance.</p> <p><b>Coordinate with agencies.</b> SCE shall provide survey results to CDFW, BLM, and CPUC prior to conducting construction activities if work is planned within bighorn sheep (BHS) habitat (as described in the TLRR Habitat and Sensitive Species Reports for Control-Haiwee and Ivanpah-Coolwater-Kramer-Inyokern) in the Cady Mountains and Clark Mountains.</p> <p><b>Avoid and minimize impacts.</b> All project activities located within areas identified as BHS habitat (as described in the TLRR Habitat and Sensitive Species Reports for Control-Haiwee and Ivanpah-Coolwater-Kramer-Inyokern) shall implement the following avoidance and minimization measures:</p> <p><b>Limited Operating Period.</b> SCE shall avoid construction activities within one-mile of bighorn sheep lambing areas during the lambing period February 1 – May 30, and from identified water sources during the dry summer months, between May 1 – September 30, in the Cady Mountains and Clark Mountains. This measure does not apply to emergencies.</p> <p>.....</p> | <p><b>Comment:</b> References to the Cady Mountains, Clark Mountains, and related water sources should be removed as these locations are no longer part of I-C Project as they were located in Segment 4 which has been removed from the project.</p> <p><b>Recommended Language:</b></p> <p><b>"Bighorn Sheep – Nelson's /Desert Bighorn Sheep.</b> Prior to initial ground-disturbing activities, a qualified biologist will conduct surveys within 2 miles from construction work areas identified as habitat (as described in the TLRR Habitat and Sensitive Species Reports for Control-Haiwee and Ivanpah-Coolwater-Kramer-Inyokern) for bighorn sheep during the peak lambing period Feb-May. During construction, monitoring by a qualified biologist will be implemented in occupied areas within the range of BHS between Feb 1 – Sept 30. The biological monitors will halt construction activities if BHS are within 500 feet of work areas or display signs of disturbance.</p> <p><del><b>Coordinate with agencies.</b> SCE shall provide survey results to CDFW, BLM, and CPUC prior to conducting construction activities if work is planned within bighorn sheep (BHS) habitat (as described in the TLRR Habitat and Sensitive Species Reports for Control-Haiwee and Ivanpah-Coolwater-Kramer-Inyokern) in the Cady Mountains and Clark Mountains.</del></p> <p><b>Avoid and minimize impacts.</b> All project activities located within areas identified as BHS habitat (as described in the TLRR Habitat and Sensitive Species Reports for Control-Haiwee and Ivanpah-Coolwater-Kramer-Inyokern) shall implement the following avoidance and minimization measures:</p> <p><b>Limited Operating Period.</b> SCE shall avoid construction activities within one-mile of bighorn sheep lambing areas during the lambing period February 1 – May 30, and from identified water sources during the dry summer months, between May 1 – September 30, <del>in the Cady Mountains and Clark Mountains.</del> This measure does not apply to emergencies."</p> |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

## DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

| Comment No. | Section | Page | DEIR Original Language   | SCE Recommended Language  |
|-------------|---------|------|--|---|
| 79          | 7.7     | 7-59 | <p>CPUC DEIR APM TRA-1:<br/> <b>APM TRA-1</b> <b>Traffic Control Measures.</b> SCE will implement traffic control measures consistent with those published in the Manual on Uniform Traffic Control Devices, as written and amended by Caltrans for the state of California (CA MUTCD) and using standard templates from the California Temporary Traffic Control Handbook (CATTCH) (California Inter-Utility Coordinating Committee 2018). These measures will be implemented as and where necessary as described in the CA MUTCD and/or CATTCH, or in ministerial permits.</p> | <p><b>Comment:</b> SCE notes that the DEIR’s description of SCE’s APM differs from what SCE included in its PEA. SCE recommends reverting to the original language of SCE’s APM included in the PEA.</p> <p><b>Recommended Language:</b></p> <p><b>APM TRA-1</b> <del>Traffic Control Measures.</del> SCE will implement traffic control measures consistent with those published in the Manual on Uniform Traffic Control Devices, as written and amended by Caltrans for the state of California (CA MUTCD) and using standard templates from the California Temporary Traffic Control Handbook (CATTCH) (California Inter-Utility Coordinating Committee 2018). These measures will be implemented as and where necessary as described in the CA MUTCD and/or CATTCH, or in ministerial permits.</p> <p><b>APM TRA-1</b> <b>Traffic Control Measures.</b> SCE shall follow its standard safety practices, including installing appropriate traffic control devices between work zones and transportation facilities, posting adequate signs, and using proper construction techniques. SCE is a member of the California Inter-Utility Coordinating Committee, which published the Manual on Uniform Traffic Control Devices, as amended for the state of California (CA MUTCD; CALTRANS 2018) and using standard templates from the California Temporary Traffic Control Handbook. (CATTCH 2018) This handbook was previously known as the California Joint Utility Traffic Control Manual. (CJUTCM 2010) SCE will follow the recommendations in this manual regarding basic standards for the safe movement of traffic on highways and streets in accordance with Section 21400 of the CVC. These recommendations include provisions for safe access of police, fire, and other rescue vehicles.</p> |

## Ivanpah-Control 115 kV TLRR Subtransmission Project

### DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

| Comment No. | Section | Page | DEIR Original Language  | SCE Recommended Language   |
|-------------|---------|------|---|--|
| 80          | 7.7     | 7-7  | <p>APM Air-2 Asbestos Management If any load-bearing structure (poles, towers, concrete pads) is to be removed, this project will require asbestos testing and notification to BAAQMD. Notify the Environmental Field Specialist (EFS) at least 45 days prior to work commencing. BAAQMD must be notified at least 10 working days prior to work (demolition) commencing. If the construction start date changes, notify the EFS immediately as notification to BAAQMD may need to be resubmitted. EFS is responsible for obtaining any necessary permits from BAAQMD prior to the start of work.</p> | <p><b>Comment:</b></p> <p>SCE notes that the DEIR includes APM AIR-2 regarding asbestos management. SCE's PEA did not include an APM for Asbestos nor did SCE's POD.</p> <p>Any reference to APM Air-2 is therefore not traceable to an adopted or baseline applicant commitment and should be corrected or removed to avoid confusion.</p> <p>If the CPUC finds that there is a need to mitigate impacts related to asbestos, the CPUC may develop an asbestos mitigation measure, however it is not clear to SCE based on the language of the DEIR that the I-C Project would result in impacts that an asbestos related mitigation measure would mitigate.</p> <p>As a result, SCE proposes removing APM AIR-2 from the DEIR.</p> <p><b>Recommended Language:</b></p> <p><del><b>APM Air-2 Asbestos Management</b> If any load-bearing structure (poles, towers, concrete pads) is to be removed, this project will require asbestos testing and notification to BAAQMD. Notify the Environmental Field Specialist (EFS) at least 45 days prior to work commencing. BAAQMD must be notified at least 10 working days prior to work (demolition) commencing. If the construction start date changes, notify the EFS immediately as notification to BAAQMD may need to be resubmitted. EFS is responsible for obtaining any necessary permits from BAAQMD prior to the start of work.</del></p> |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

## DRAFT ENVIRONMENTAL IMPACT REPORT

### Proposed Editorial Changes

| Section  | Page  | DEIR Original Language   | SCE Recommended Language and/or Comment  |
|----------|-------|--|--|
| ES.2     | ES-2  | The Proposed Project would ensure compliance with CPUC GO 95 by remediating approximately 2,950 discrepancies identified through SCE's TLRR Program along seven (7) 115 kV circuits.   | <b>Recommended language:</b> The Proposed Project would ensure compliance with CPUC GO 95 by remediating approximately <u>2,487</u> <del>2,950</del> discrepancies identified through SCE's TLRR Program along <del>seven</del> <u>six (6)</u> 115 kV circuits.  |
| ES.2.    | ES-2  | ... identified through SCE's TLRR Program along seven (7) 115 kV circuits.   | <b>Recommended language:</b> ... identified through SCE's TLRR Program along <del>seven (7)</del> <u>six (6)</u> 115 kV circuits.  |
| ES.2.    | ES-2  | The Proposed Project would ensure compliance with CPUC GO 95 by remediating approximately 2,950 discrepancies identified through SCE's TLRR Program along seven (7) 115 kV circuits.   | <b>Recommended language:</b> The Proposed Project would ensure compliance with CPUC GO 95 by remediating approximately <u>2,500</u> <del>2,950</del> discrepancies identified through SCE's TLRR Program along <u>six (6)</u> <del>seven (7)</del> 115 kV circuits.  |
| ES.2.2.1 | ES-4  | The existing I-C transmission <del>system</del> network includes <del>five</del> primary 115 kV circuits.  | <b>Recommended language:</b> The existing I-C transmission <u>network</u> <del>system</del> includes <del>six</del> <u>five</u> primary 115 kV circuits.   |
| ES.2.2.1 | ES-4  | The purpose of the I-C Project is to ensure compliance with CPUC GO 95 standards by remediating approximately 2,950 discrepancies identified through SCE's TLRR Program along the 4 segments comprising the existing 115 kV circuits.  | <b>Recommended language:</b> The purpose of the I-C Project is to ensure compliance with CPUC GO 95 standards by remediating approximately <u>2,500</u> <del>2,950</del> discrepancies identified through SCE's TLRR Program along the 4 segments comprising the existing 115 kV circuits.   |
| ES.7.2   | ES-11 | Table ES-1<br>Crater Mountain Realignment Alternative<br><br>Manzanar Realignment Alternative<br><br>Fossil Falls Realignment Alternative  | <b>Comment:</b> All three route alternatives also cross private property not owned by LADWP.<br><br><b>Recommended language:</b> For all three alternatives, revise to include the following language:<br><ul style="list-style-type: none"> <li>• Feasibility: Technically feasible; would require land rights from LADWP <u>and other private property owners</u></li> </ul>   |
| ES.7.3.1 | ES-14 | Crater Mountain Realignment Alternative, Rationale for Full Analysis. The alternative would require new easements, which would result in additional cost, but the cost would not be expected to prohibit implementation of the project. The alternative would require land rights from LADWP, which could result in delays to implementation, but are considered potentially feasible to obtain. The alternative meets all project objectives and feasibility criteria for evaluation. | <b>Comment:</b> Some private property is impacted, so language should read similar to that in the other two alternatives.<br><br><b>Recommended language:</b> Crater Mountain Realignment Alternative, Rationale for Full Analysis. The alternative would require new easements, which would result in additional cost, but the cost would not be expected to prohibit implementation of the project. The alternative would require land rights from LADWP <u>and other private property owners</u> , which could result in delays to implementation, but are considered potentially feasible to obtain. The alternative meets all project objectives and feasibility criteria for evaluation. |
| ES.7.3.2 | ES-14 | The alternative would be allocated as much as roughly 2.5 miles east of the Proposed Project alignment.  | <b>Recommended language:</b> The alternative would be <del>allocated</del> <u>located</u> as much as roughly 2.5 miles east of the Proposed Project alignment.   |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

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### Proposed Editorial Changes

| Section  | Page  | DEIR Original Language   | SCE Recommended Language and/or Comment  |
|----------|-------|--|--|
| ES.7.3.3 | ES-15 | <p>ES.7.3.3. Fossil Falls Realignment Alternative</p> <p>Description. The Fossil Falls Realignment alternative would be approximately 14 miles long. The northern terminus of the alternative would be located adjacent to the Coso Substation, near Structure 832. The alternative would be located adjacent to three LADWP transmission lines and would reconnect with the Proposed Project route approximately 6 miles north of Pearsonville at proposed Structure 935. The alternative would be as much as approximately 2 miles east of the Proposed Project alignment.</p> | <p><b>Recommended language:</b></p> <p>ES.7.3.3. Fossil Falls Realignment Alternative</p> <p>Description. The Fossil Falls Realignment alternative would be approximately 14 miles long. The northern terminus of the alternative would be located adjacent to the Coso Substation, near Structure <del>832</del> 815. The alternative would be located adjacent to three LADWP transmission lines and would reconnect with the Proposed Project route approximately 6 miles north of Pearsonville at proposed Structure <del>935</del> 936. The alternative would be as much as approximately 2 miles east of the Proposed Project alignment.</p> |
| 1        | 1-2   | The Proposed Project would implement a Transmission Line Rating Remediation (TLRR) program to correct discrepancies in minimum horizontal and vertical conductor clearances on its 115 kV transmission lines and structures between 8 substations.   | <b>Recommended language:</b> The Proposed Project would implement a Transmission Line Rating Remediation (TLRR) program to correct discrepancies in minimum horizontal and vertical conductor clearances on its 115 kV transmission lines and structures between <del>98</del> substations.  |
| 1.2.2    | 1-5   | The existing I-C transmission system includes four primary 115 kV circuits. In 2006, SCE identified that the clearances along some of its circuits were not compliant with the clearances set forth in CPUC GO 95 due to: the instillation of additional infrastructure under SCE lines over time; survey, engineering, and construction inaccuracies; the growth of vegetation; and changes in topography.  | <b>Recommended language:</b> The existing I-C transmission system includes <del>six four</del> primary 115 kV circuits. In 2006, SCE identified that the clearances along some of its circuits were not compliant with the clearances set forth in CPUC GO 95 due to: the <del>installation</del> <del>instillation</del> of additional infrastructure under SCE lines over time; survey, engineering, and construction inaccuracies; the growth of vegetation; and changes in topography.   |
| 1.2.2    | 1-6   | The collective effort to identify and remediate these discrepancies across SCE's system is referred to as the Transmission Line Rating Remediation (TLRR) Program. Bason on the LiDAR and engineering modeling work, SCE's TLRR Program is developing a remediation plan for each discrepancy to ensure compliance with CPUC GO 95 standards. SCE has stated it is committed to undertaking all reasonable efforts to correct discrepancies on the I-C Project 115 kV subtransmission lines prior to January 1, 2025.  | <b>Recommended language:</b> The collective effort to identify and remediate these discrepancies across SCE's system is referred to as the Transmission Line Rating Remediation (TLRR) Program. <del>Based on Bason</del> the LiDAR and engineering modeling work, SCE's TLRR Program is developing a remediation plan for each discrepancy to ensure compliance with CPUC GO 95 standards. SCE has stated it is committed to undertaking all reasonable efforts to correct discrepancies on the I-C Project 115 kV subtransmission lines prior to January 1, 2025.  |
| 1.4      | 1-10  | There are 19 Native American Tribes that have requested consultation under AB 52.  | <b>Recommended language:</b> There are <del>49</del> 18 Native American Tribes that have requested consultation under AB 52.   |
| 2.1      | 2-1   | As illustrated in Figure 1-1 (Proposed Project Route and Segments), the Proposed Project would consist of four segments affecting existing, new, and upgraded subtransmission facilities spanning 12 existing substations. All Chapter 2 figures are presented at the end of the chapter.  | <b>Recommended language:</b> As illustrated in Figure 1-1 (Proposed Project Route and Segments), the Proposed Project would consist of four segments affecting existing, new, and upgraded subtransmission facilities spanning <del>9</del> <del>42</del> -existing substations. All Chapter 2 figures are presented at the end of the chapter.  |
| 2.1.1    | 2-1   | SCE proposes to rebuild components of its existing 115 kV subtransmission system that extend over 262 miles between 8 existing SCE substations across portions of three counties.  | <b>Recommended language:</b> SCE proposes to rebuild components of its existing 115 kV subtransmission system that extend over 262 miles between <del>9</del> <del>8</del> existing SCE substations across portions of three counties.   |
| 2.2.1    | 2-4   | In Segments 3N and 3S, SCE would remove certain existing subtransmission towers and poles and replace them with steel multi-pole structures constructed from TSPs; wood multi-pole structures; and steel and wood H-frames constructed from LWS and wood poles.  | <b>Recommended language:</b> In Segments 3N and 3S, SCE would remove certain existing subtransmission <del>towers and</del> poles and replace them with steel multi-pole structures constructed from TSPs; wood multi-pole structures; and steel and wood H-frames constructed from LWS and wood poles.  |

# Ivanpah-Control 115 kV TLRR Subtransmission Project

## DRAFT ENVIRONMENTAL IMPACT REPORT

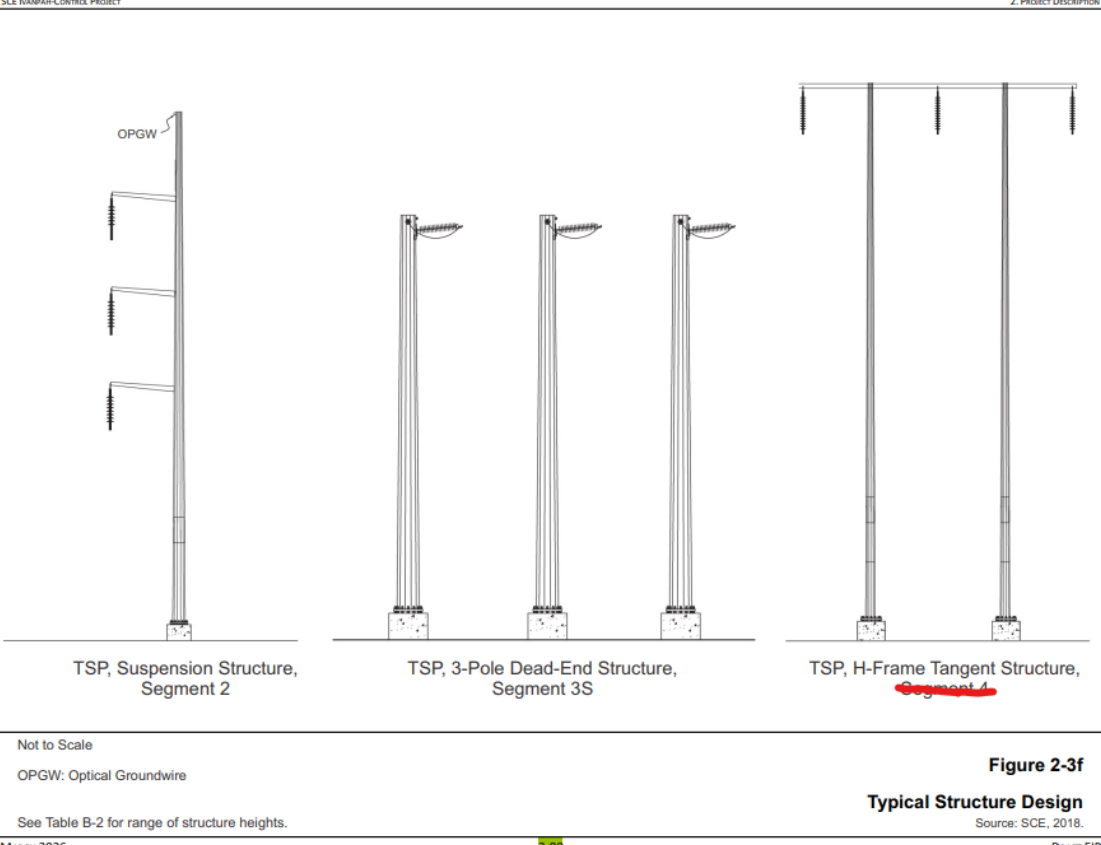
### Proposed Editorial Changes

| Section  | Page                                | DEIR Original Language   | SCE Recommended Language and/or Comment  |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
|--|-------------------------------------|--|--|-------------------------------------|----------------------|----------------------------------|--|------------------------------------|-------|---------|------------------------------|------|---------------------------------------|---|--|------|-----|---|--|-------|-----|-------|--|----------------|--------------|----------------|--|-----------------------------|-----------|----------|-------------|-------------|--|
| 2.2.1.1  | 2-4                                 | Approximately 744 TSP and 397 permanent LWS poles would be installed as part of the Proposed Project...<br>Approximately 124 multipole TSP structures...   | <b>Recommended language:</b> Approximately <del>744</del> <u>725</u> TSP and 397 permanent LWS poles would be installed as part of the Proposed Project...<br>Approximately <del>124</del> <u>128</u> multipole TSP structures...                |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| 2.2.1.1  | 2-5                                 | The horizontal member of the H-frames would be approximately 7-square inches.  | <b>Recommended language:</b> The horizontal member of the H-frames would be approximately 7-square inches <u>square</u> .  |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| 2.2.1.4  | 2-6                                 | In Segments 3N and 3S, a single circuit of conductor would be installed on the existing, replacement, and interset structures.   | <b>Recommended language:</b> In Segments 3N and 3S, a single circuit of conductor would be installed on the existing, replacement, and interset structures. <u>There would be no OHGW, OPGW, or ADSS installed in these segments.</u>            |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| 2.4.1.5  | 2-14                                | The dimensions of the construction work areas required for the helicopter take-off and landing zones (HLZs) will vary depending on the operations required and location selected for an estimated 5 landing sites.   | <b>Recommended language:</b> The dimensions of the construction work areas required for the helicopter take-off and landing zones (HLZs) will vary depending on the operations required and locations selected for an estimated 5 landing sites. |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| 2.4.2.1  | 2-17                                | Approximately 458 pull and tension sites and 63 conductor snub sites and splice areas are proposed.  | <b>Recommended language:</b> Approximately 458 pull and tension sites and <del>63</del> <u>64</u> conductor snub sites and splice areas are proposed.  |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| 2.4.5.2  | 2-26                                | Modifications to the existing substations at Baker, Control, Coso, Haiwee, Inyokern, Randsburg, and Kramer Substations would be required for the Project.  | <b>Recommended language:</b> Modifications to the existing substations at <del>Baker</del> , Control, Coso, Haiwee, Inyokern, Randsburg, and Kramer Substations would be required for the Project.   |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| 2.4.5  | 2-25                                | <p><b>Table 2-4. Summary of Estimated Ground Disturbance</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Project Feature</th> <th style="text-align: center;">Acres Disturbed During Construction</th> <th style="text-align: center;">Acres to be Restored</th> <th style="text-align: center;">Acres Permanently Disturbed</th> </tr> </thead> <tbody> <tr> <td>Subtransmission Lines (from Table 2-6)</td> <td style="text-align: center;">2,285.4</td> <td style="text-align: center;">123.5</td> <td style="text-align: center;">1,614.7</td> </tr> <tr> <td>Substations (from Table 2-7)</td> <td style="text-align: center;">0.5</td> <td style="text-align: center;">0.5</td> <td style="text-align: center;">0</td> </tr> <tr> <td>Telecommunications Amplifier Site (from Table 2-8)</td> <td style="text-align: center;">10.5</td> <td style="text-align: center;">0</td> <td style="text-align: center;">10.5</td> </tr> <tr> <td>Access and Spur Roads (from Table 2-9)</td> <td style="text-align: center;">678.3</td> <td style="text-align: center;">0</td> <td style="text-align: center;">129.7</td> </tr> <tr> <td><b>Total Estimated Land Disturbance</b></td> <td style="text-align: center;"><b>2,974.2</b></td> <td style="text-align: center;"><b>124.0</b></td> <td style="text-align: center;"><b>1,754.9</b></td> </tr> </tbody> </table>   | Project Feature  | Acres Disturbed During Construction | Acres to be Restored | Acres Permanently Disturbed      | Subtransmission Lines (from Table 2-6) | 2,285.4                            | 123.5 | 1,614.7 | Substations (from Table 2-7) | 0.5  | 0.5                                   | 0 | Telecommunications Amplifier Site (from Table 2-8) | 10.5 | 0   | 10.5                                    | Access and Spur Roads (from Table 2-9) | 678.3 | 0   | 129.7 | <b>Total Estimated Land Disturbance</b>    | <b>2,974.2</b> | <b>124.0</b> | <b>1,754.9</b> | <p><b>Comment:</b> Referenced tables should read 2-5 through 2-8 (instead of 2-6 through 2-9)</p> <p><b>Recommended language:</b> <u>Correct table references from 2-6 through 2-9 to 2-5 through 2-8.</u></p> |                             |           |          |             |             |  |
| Project Feature                                    | Acres Disturbed During Construction | Acres to be Restored   | Acres Permanently Disturbed  |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| Subtransmission Lines (from Table 2-6)             | 2,285.4                             | 123.5  | 1,614.7  |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| Substations (from Table 2-7)                       | 0.5                                 | 0.5  | 0  |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| Telecommunications Amplifier Site (from Table 2-8) | 10.5                                | 0  | 10.5   |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| Access and Spur Roads (from Table 2-9)             | 678.3                               | 0  | 129.7  |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| <b>Total Estimated Land Disturbance</b>            | <b>2,974.2</b>                      | <b>124.0</b>   | <b>1,754.9</b>   |                                     |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| 2.4.5.2  | 2-27                                | <p><b>Table 2-7. Ground Disturbance for Construction of Telecommunications Amplifier Site</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Other Facilities</th> <th style="text-align: center;">Underground Length (feet)</th> <th style="text-align: center;">Number of Pull Boxes</th> <th style="text-align: center;">Temporary Area Disturbed (acres)</th> <th style="text-align: center;">Permanent Area Disturbed (acres)</th> </tr> </thead> <tbody> <tr> <td>Independence Amplifier Site Trench</td> <td style="text-align: center;">40</td> <td style="text-align: center;">3</td> <td style="text-align: center;">0.02</td> <td style="text-align: center;">0.02</td> </tr> <tr> <td>Independence Amplifier Line, 60 poles</td> <td style="text-align: center;">—</td> <td style="text-align: center;">—</td> <td style="text-align: center;">4.4</td> <td style="text-align: center;">4.4</td> </tr> <tr> <td>Independence Amplifier Line, Pull Sites</td> <td style="text-align: center;">—</td> <td style="text-align: center;">—</td> <td style="text-align: center;">2.5</td> <td style="text-align: center;">2.5</td> </tr> <tr> <td>Haiwee Substation, LADWP pole replacements</td> <td style="text-align: center;">—</td> <td style="text-align: center;">—</td> <td style="text-align: center;">3.56</td> <td style="text-align: center;">3.56</td> </tr> <tr> <td><b>Amplifier Site Total</b></td> <td style="text-align: center;"><b>40</b></td> <td style="text-align: center;"><b>3</b></td> <td style="text-align: center;"><b>10.5</b></td> <td style="text-align: center;"><b>10.5</b></td> </tr> </tbody> </table> <p>Source: SCE, PEA Table 3.7-6. Updated with SCE Response to DR 7 (4/13/2021)</p> | Other Facilities   | Underground Length (feet)           | Number of Pull Boxes | Temporary Area Disturbed (acres) | Permanent Area Disturbed (acres)       | Independence Amplifier Site Trench | 40    | 3       | 0.02                         | 0.02 | Independence Amplifier Line, 60 poles | — | —  | 4.4  | 4.4 | Independence Amplifier Line, Pull Sites | —                                      | —     | 2.5 | 2.5   | Haiwee Substation, LADWP pole replacements | —              | —            | 3.56           | 3.56   | <b>Amplifier Site Total</b> | <b>40</b> | <b>3</b> | <b>10.5</b> | <b>10.5</b> | <p><b>Comment:</b> The Haiwee Substation line item is misplaced, as it is not part of the amplifier site work. This information should be reflected as an additional line item in Table 2-6 instead of as disturbance associated with construction at existing substation facilities.</p> <p><b>Recommended language:</b> <u>Relocate information regarding Haiwee Substation, LADWP pole replacements to Table 2-6.</u></p> |
| Other Facilities                                   | Underground Length (feet)           | Number of Pull Boxes   | Temporary Area Disturbed (acres)   | Permanent Area Disturbed (acres)    |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| Independence Amplifier Site Trench                 | 40                                  | 3  | 0.02   | 0.02                                |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| Independence Amplifier Line, 60 poles              | —                                   | —  | 4.4  | 4.4                                 |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| Independence Amplifier Line, Pull Sites            | —                                   | —  | 2.5  | 2.5                                 |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| Haiwee Substation, LADWP pole replacements         | —                                   | —  | 3.56   | 3.56                                |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |
| <b>Amplifier Site Total</b>                        | <b>40</b>                           | <b>3</b>   | <b>10.5</b>  | <b>10.5</b>                         |                      |                                  |  |                                    |       |         |                              |      |                                       |   |  |      |     |   |  |       |     |       |  |                |              |                |  |                             |           |          |             |             |  |

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### Proposed Editorial Changes

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| 2.9      | 2-80   | Figure 2-3f: TSP, H-Frame Tangent Structure, Segment 4.  | <p><b>Comment:</b> Segment 4 has been removed from the project scope. Please remove Segment 4 wording under the structure label.</p> <p><b>Recommended language to Figure 2-3f</b> (see red-line). Please cross out the word Segment 4.</p>  |
| 3.2.3.3  | 3.2-24 | In Segment 1, SCE would remove all existing subtransmission towers, poles, and conductors and would replace them with tubular steel poles (TSPs), lightweight steel (LWS) poles, LOS pole H-frames, tubular steel multi-poles, and LWS pole structures and new conductors. | <b>Recommended language:</b> In Segment 1, SCE would remove all existing subtransmission towers, poles, and conductors and would replace them with tubular steel poles (TSPs), lightweight steel (LWS) poles, <del>LOS</del> <u>LWS</u> pole H-frames, tubular steel multi-poles, and LWS pole structures and new conductors.    |
| 3.2.3.3. | 3.2-25 | Within the northern portion of Segment 1, the Project parallels and crosses (once) a 20.1-mile segment of US 395 that is an Officially Designated Scenic Highway, between Fort Independence in the south to approximately Fish Springs Road in the north                   | <b>Recommended language:</b> Within the northern portion of Segment 1, the Project parallels and crosses (once) <u>approximately</u> 20.1-mile segment of US 395 that is an Officially Designated Scenic Highway, between Fort Independence in the south to approximately Fish Springs Road in the north                         |

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| 3.3.4   | 3.3-13 | <p>Mitigation Measure AF-6b (Avoid Operational Conflicts with Existing Agricultural Irrigation; full text below) and Mitigation Measure HH-8a (Implement grounding measures to avoid shocks, see Section 3.11, Hazards and Hazardous Materials) require SCE to ensure the relocated subtransmission line does not result in induced current that could cause corrosion or shock hazards.</p> <p>Due to compliance with General Order 95, the Proposed Project would not conflict with existing agricultural irrigation systems. Impacts on active agricultural operations would be less than significant with implementation of Mitigation Measures AF-6b (Avoid Operational Conflicts with Existing Agricultural Irrigation) and HH-8a (Implement ground measures to avoid shocks).</p>   | <p><b>Recommended language:</b> Mitigation Measure AF-6b (Avoid Operational Conflicts with Existing Agricultural Irrigation; full text below) and Mitigation Measure HH-<del>8a</del><u>7a</u> (Implement grounding measures to avoid shocks, see Section 3.11, Hazards and Hazardous Materials) require SCE to ensure the relocated subtransmission line does not result in induced current that could cause corrosion or shock hazards.</p> <p>Due to compliance with General Order 95, the Proposed Project would not conflict with existing agricultural irrigation systems. Impacts on active agricultural operations would be less than significant with implementation of Mitigation Measures AF-6b (Avoid Operational Conflicts with Existing Agricultural Irrigation) and HH-<del>8a</del><u>7a</u> (Implement ground measures to avoid shocks).</p>  |
| 3.4.3.1 | 3.4-7  | <p>All construction- and operation-related emissions are quantified based on the best available forecast of activities. For each of the activities of the Project Description, the Applicant (SCE, PEA Appendix F 2020) developed emissions estimates. The Applicant's emissions estimates for ground construction activities use the California Emissions Estimator Model (CalEEMod; version 2016.3.2) software developed by the California Air Pollution Control Officers Association (CAPCOA).<sup>1</sup> CalEEMod uses mobile source emission factors from the Air Resources Board (ARB) OFFROAD inventory and EMFAC2014 models, for off-highway construction equipment and on-highway motor vehicles, respectively. the applicant's estimates for helicopter emissions use factors from the Swiss Federal Office of Civil Aviation (FOCA) Guidance on the Determination of Helicopter Emissions. The activity assumptions and emission factors are found in the applicants' emissions estimates (SCE, PEA Appendix F), and a summarization of resulting quantities of emissions appear in this EIR in Appendix 3, Air Quality.</p> | <p><b>Comment:</b> Information provided in the text reference the 2020 SCE PEA. However, the evaluation references a more recent evaluation conducted in 2024 which resulted in different emissions using a different CalEEMod version. SCE suggests revising the references to reflect the appropriate document.</p> <p><b>Recommended language:</b> All construction- and operation-related emissions are quantified based on the best available forecast of activities. For each of the activities of the Project Description, the Applicant (SCE, PEA Appendix F 2020) developed emissions estimates. The Applicant's emissions estimates for ground construction activities use the California Emissions Estimator Model (CalEEMod; version <del>2016.3.2</del> <u>2022.1.122</u>) software developed by the California Air Pollution Control Officers Association (CAPCOA).<sup>1</sup> CalEEMod uses mobile source emission factors from the Air Resources Board (ARB) OFFROAD inventory and EMFAC<del>2014</del><u>2021</u> models, for off-highway construction equipment and on-highway motor vehicles, respectively. the applicant's estimates for helicopter emissions use factors from the Swiss Federal Office of Civil Aviation (FOCA) Guidance on the Determination of Helicopter Emissions. The activity assumptions and emission factors are found in the applicants' emissions estimates (SCE, PEA Appendix F), and a summarization of resulting quantities of emissions appear in this EIR in Appendix 3, Air Quality.</p> |
| 3.4.3.3 | 3.4-12 | <p>Impact AQ-3. Construction emissions would occur over a large area, along the 359 miles of existing subtransmission lines located in Inyo, Kern, and San Bernardino Counties.</p>  | <p><b>Recommended language:</b> Impact AQ-3. Construction emissions would occur over a large area, along the <del>262</del> <u>359</u> miles of existing subtransmission lines located in Inyo, Kern, and San Bernardino Counties.</p>   |

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| Section  | Page   | DEIR Original Language   | SCE Recommended Language and/or Comment  |
|----------|--------|--|--|
| 3.5.1    | 3.5-2  | <p><b>3.5.1. Environmental Setting</b><br/>This section describes the biological resources that occur in the vicinity of the Proposed Project. It includes a description of the existing biotic environment, including sensitive habitats and natural communities as well as special-status species and their locations in relation to the Proposed Project. Section 3.5.1.1 provides an overview of the relevant biological resources across the geographic extent of the Proposed Project and Section 3.5.1.2 provides the relevant biological resources by segment. This information is based on biological resources information provided in SCE Proponent’s Environmental Assessment (PEA) (SCE, 2020) and survey results from field checks in 2023 and 2024.</p> | <p><b>Comment:</b> SCE recommends incorporating the requested additional surveys into the 2025 evaluation cycle and addressing the results as part of the 2025 ARDR review and the updated ICF 2025 analysis to ensure consistency with the most current data and avoid duplicative efforts</p> <p><b>Recommended language: 3.5.1. Environmental Setting</b><br/>This section describes the biological resources that occur in the vicinity of the Proposed Project. It includes a description of the existing biotic environment, including sensitive habitats and natural communities as well as special-status species and their locations in relation to the Proposed Project. Section 3.5.1.1 provides an overview of the relevant biological resources across the geographic extent of the Proposed Project and Section 3.5.1.2 provides the relevant biological resources by segment. This information is based on biological resources information provided in SCE Proponent’s Environmental Assessment (PEA) (SCE, 2020) and survey results from field checks in 2023 and 2024, and 2025.</p> |
| 3.5.1.1. | 3.5-2  | Regional Setting: 262 miles between eleven existing SCE substations across portions of three counties.   | <b>Recommended language:</b> Regional Setting: 262 miles between <u>nine</u> <del>eleven</del> existing SCE substations across portions of three counties  |
| 3.5.1.3  | 3.5-14 | Western Bumble Bee...The Project is outside of the current and historic species’ range. There is low potential to occur in Segment 3S.   | <b>Recommended language:</b><br>Western Bumble Bee...The Project is outside of the current and historic species’ range. <u>Species does not occur in Project area</u> <del>There is low potential to occur in Segment 3S.</del>  |
| 3.5.1.3  | 3.5-8  | July gold. July gold is designated as rare under CESA and has a CRPR designation of 1B.3.  | <b>Recommended language:</b> July gold. July gold is designated as rare under <del>CESA</del> <u>NPPA</u> and has a CRPR designation of 1B.3.  |
| 3.5.1.5  | 3.5-19 | Jurisdictional waters are shown in detail in the Wetlands and Other Waters Jurisdictional Delineation Reports for the Project (Arcadis 2019c, 2019d) (see Appendix I of the Proponent’s Environmental Assessment (PEA), Attachments E and F. Additional features were mapped in 2023 for the alternative alignments in Segment 1 (Arcadis, 2023b) (refer to Chapter 4).  | <p><b>Comment:</b> SCE recommends incorporating the additional field verification completed in support of IC waters permits</p> <p><b>Recommended language:</b> Jurisdictional waters are shown in detail in the Wetlands and Other Waters Jurisdictional Delineation Reports for the Project (Arcadis 2019c, 2019d) (see Appendix I of the Proponent’s Environmental Assessment (PEA), Attachments E and F. Additional features were mapped in 2023 for the alternative alignments in Segment 1 (Arcadis, 2023b) (refer to Chapter 4). <u>ICF report (ICF. 2025 Aquatic Resources Delineation Report, Ivanpah Control Projects. August, San Diego, CA. Prepared for SCE.</u></p>  |
| 3.5.1.6  | 3.5-25 | Spiny saltbush, which is dominant along the proposed route in Segment 2, has a wetland indicator status of facultative (FAC), a facultative species that is equally likely to occur in wetlands as in non-wetlands (Arcadis, 2019a).   | <b>Recommended language:</b> Spiny saltbush, which is dominant along the proposed route in Segment <del>23N</del> , has a wetland indicator status of facultative (FAC), a facultative species that is equally likely to occur in wetlands as in non-wetlands (Arcadis, 2019a).  |
| 3.5-4    | 3.5-83 | <b>BIO-1f</b> Minimize traffic impacts. SCE will specify and enforce a maximum 20 mile per hour vehicle speed limit on access roads within the ROW and project vicinity  | <b>Recommended language: BIO-1f</b> Minimize traffic impacts. SCE will specify and enforce a maximum <del>20</del> <u>15</u> mile per hour vehicle speed limit on access roads within the ROW and project vicinity.  |

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| 3.6      | 3.6-54 | Mitigation Measures CUL-1a through CUL-1l, which are summarized as follows (the full text is presented below).  | <p><b>Comment:</b> DEIR Summary section is missing one of the mitigation measures, Develop Data Recovery Plans which is listed as MM CUL-1b in full test of MM. This throws off the numbering and reference to all the MM CUL throughout document.</p> <p>Mitigation Measures CUL-1a through CUL-1l, which are summarized as follows (the full text is presented <del>below</del> on page 3.6-59 to 3.6-65).</p>   |
| 3.6      | 3.6-55 | While data recovery, as defined in Mitigation Measure CUL-1c, can mitigate for the loss of information potential, it cannot fully offset the anticipated loss of the physical integrity, spatial relationships, and cultural associations that contribute to the significance of these resources.   | <p><b>Comment:</b> Mitigation Measure CUL-1c full language is not until page 3.6-60 and is not the data recovery measure. MM CUL-1b is Develop Data Recovery Plans for Known Historical Archaeological Resources. MM CUL-1c is Implement Cultural Resources Environmental Awareness Training.</p> <p><b>Recommended language:</b> While data recovery, as defined in Mitigation Measure CUL-4e, 1b can mitigate for the loss of information potential, it cannot fully offset the anticipated loss of the physical integrity, spatial relationships, and cultural associations that contribute to the significance of these resources.</p>   |
| 3.9.3.3  | 3.9-36 | The Proposed Project structures would be designed in accordance with SCE's geotechnical standards, which rely on standard engineering practices and guidelines (SDG&E, 2009; ASCE, 2025).   | <b>Recommended language:</b> The Proposed Project structures would be designed in accordance with SCE's geotechnical standards, which rely on standard engineering practices and guidelines (SDG&E, 2009; ASCE, 2025).   |
| 3.9.3.3  | 3.9-37 | It is estimated that the ground disturbance required for construction of the Proposed Project would be nearly 2,300 acres (see Table 2-5, Section 2).   | <b>Recommended language:</b> It is estimated that the ground disturbance required for construction of the Proposed Project would be nearly <u>3,000</u> <del>2,300</del> acres (see Table 2- <del>45</del> , Section 2).   |
| 3.9.3.3  | 3.9-37 | It is estimated that the ground disturbance required for construction of the Proposed Project would be nearly 2,300 acres (see Table 2-5, Section 2).   | <p><b>Comment:</b> Corrected value to match Table 2-4</p> <p><b>Recommended language:</b> It is estimated that the ground disturbance required for construction of the Proposed Project would be nearly <u>3,000</u> <del>2,300</del> acres (see Table 2-<del>45</del>, Section 2).</p>  |
| 3.9.5    | 3.9-44 | SDG&E (San Diego Gas & Electric Company). 2009. Seismic Structure Loading. Available: <a href="https://scedc.caltech.edu/earthquake/chronological.html">https://scedc.caltech.edu/earthquake/chronological.html</a> . Accessed October 25, 2019.  | <b>Comment:</b> SCE suggests to either remove the reference to SDG&E or change to just reference the Caltech earthquake line.  |
| 3.10.3.1 | 3.10-4 | All construction- and operation-related emissions are quantified based on the best available forecast of activities. For each of the activities of the Project Description, the Applicant (SCE, PEA Appendix F, 2020) developed emissions estimates within a database that draws emissions factors from the California Emissions Estimator Model (CalEEMod; version 2022.1) software developed by the California Air Pollution Control Officers Association (CAPCOA). <sup>1</sup> The emission factors embedded in this version of the CalEEMod software draw upon mobile source emission factors from the California Air Resources Board (CARB) OFFROAD inventory and EMFAC2014 models. The activity assumptions, emission factors, and resulting quantities of emissions appear in PEA Appendix F: Air Quality Calculations. This EIR includes Appendix 3, Air Quality, to summarize the results of the emissions estimates. | <b>Recommended language:</b> All construction- and operation-related emissions are quantified based on the best available forecast of activities. For each of the activities of the Project Description, the Applicant (SCE, PEA Appendix F, 2020) developed emissions estimates within a database that draws emissions factors from the California Emissions Estimator Model (CalEEMod; <del>version 2016.3.2</del> <u>2022.1.122</u> ) software developed by the California Air Pollution Control Officers Association (CAPCOA). <sup>1</sup> The emission factors embedded in this version of the CalEEMod software draw upon mobile source emission factors from the California Air Resources Board (CARB) OFFROAD inventory and EMFAC <del>2014</del> <u>2021</u> models. The activity assumptions, emission factors, and resulting quantities of emissions appear in PEA Appendix F: Air Quality Calculations. This EIR includes Appendix 3, Air Quality, to summarize the results of the emissions estimates. |

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| 3.10.3.1 | 3.10-4  | 1 Use of the prior desktop version (2016.3.2) of CalEEMod is acceptable in this case based on the project application filing date in April 2020; an initial online version of the CalEEMod software was launched in December 2022 (2022.1.1.3).  | <b>Comment:</b> SCE suggests removing this footnote because evaluation used in the EIR uses Version 2022, not 2016.   |
| 3.10.3.3 | 3.10-5  | LESS THAN SIGNIFICANT. The Proposed Project would rebuild components of SCE's existing 115 kV subtransmission system that extends over 262 miles between 12 existing SCE substations across portions of three counties.  | <b>Recommended language:</b> LESS THAN SIGNIFICANT. The Proposed Project would rebuild components of SCE's existing 115 kV subtransmission system that extends over 262 miles between <u>9</u> <del>42</del> existing SCE substations across portions of three counties.  |
| 3.10.5   | 3.10-8  | MDQAMD (Mojave Desert Air Quality Management District). 2016. California Environmental Quality Act (CEQA) and Federal Conformity Guidelines. <a href="https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_2-AirQuality/67999_MDAQMD_2016_-_Guidelines_and_Conformity_Analysis.pdf">https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_2-AirQuality/67999_MDAQMD_2016_-_Guidelines_and_Conformity_Analysis.pdf</a> .   | <b>Recommended language:</b> <del>MDQAMD</del> MDAQMD (Mojave Desert Air Quality Management District). 2016. California Environmental Quality Act (CEQA) and Federal Conformity Guidelines. <a href="https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_2-AirQuality/67999_MDAQMD_2016_-_Guidelines_and_Conformity_Analysis.pdf">https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_2-AirQuality/67999_MDAQMD_2016_-_Guidelines_and_Conformity_Analysis.pdf</a> .   |
| 3.11.3.1 | 3.11-16 | The Applicant proposed to implement two Applicant Proposed Measures (APMs) pertaining to hazards and hazardous materials to ensure the Proposed Project would be constructed and operated with minimal environmental impacts in a manner consistent with applicable rules and regulations.   | <b>Recommended language:</b> The Applicant proposed to implement <del>two</del> <u>three</u> Applicant Proposed Measures (APMs) pertaining to hazards and hazardous materials to ensure the Proposed Project would be constructed and operated with minimal environmental impacts in a manner consistent with applicable rules and regulations.   |
| 3.12.1.1 | 3.12-1  | The Mojave Desert is characterized by low rainfall, hot summers, cool to cold winters, and sparse vegetation adapted to arid conditions. Average annual rainfall along the project route ranges from a little over four to five inches throughout most of the route (five inches per year in the northern end of the Owens Valley of Inyo County to slightly over four inches at Barstow and Baker in San Bernardino County), rising to a little over eight inches per year in the Mountain Pass area at the eastern end of the route. | <b>Recommended language:</b> The Mojave Desert is characterized by low rainfall, hot summers, cool to cold winters, and sparse vegetation adapted to arid conditions. Average annual rainfall along the project route ranges from a little over four to five inches throughout most of the route (five inches per year in the northern end of the Owens Valley of Inyo County to slightly over four inches at Barstow and Baker in San Bernardino County), rising to a little over eight inches per year in the <del>Mountain Pass area at the eastern end of the route.</del>  |
| 3.12.3.3 | 3.12-13 | HDD operations could result in frac-out that would have the potential for contamination of surface waters with drilling mud.   | <b>Recommended language:</b> <del>HDD operations could result in frac-out that would have the potential for contamination of surface waters with drilling mud</del>   |
| 3.12.3.3 | 3.12-13 | Because the Proposed Project would disturb more than 1 acre, SCE is required to apply for coverage under a General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ.  | <b>Recommended language:</b> Because the Proposed Project would disturb more than 1 acre, SCE is required to apply for coverage under a General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, <u>Order 2022-057-DWQ</u> . <del>Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ.</del>   |
| 3.13.1.1 | 3.13-1  | The Project is located near land managed by the United States Forest Service (USFS) (e.g., Inyo National Forest) and the National Park Service (NPS) (e.g., Manzanar National Historic Site and Mojave National Preserve); however, there are no USFS or NPS managed lands within the study area.  | <b>Recommended language:</b> The Project is located near land managed by the United States Forest Service (USFS) (e.g., Inyo National Forest) and the National Park Service (NPS) (e.g., Manzanar National Historic Site <del>and Mojave National Preserve</del> ); however, there are no USFS or NPS managed lands within the study area.  |
| 3.13.1.1 | 3.13-2  | Areas of Critical Environmental Concern (ACECs). ACEC designations highlight areas where special management attention is needed to protect important historical, cultural, and scenic values, or fish and wildlife or other natural resources. ACECs can only be designated during the land-use planning process. There are 20 ACECs within the Project study area.  | <b>Recommended language:</b> Areas of Critical Environmental Concern (ACECs). ACEC designations highlight areas where special management attention is needed to protect important historical, cultural, and scenic values, or fish and wildlife or other natural resources. ACECs can only be designated during the land-use planning process. There are <u>10</u> <del>20</del> ACECs within the Project study area.   |
| 3.13.1.1 | 3.13-2  | Extensive Recreation Management Areas (ERMAs). ERMAs recognize existing recreation use, demand, or recreation and visitor services program investments and are managed to sustain principal recreation activities and associated qualities and conditions of the ERMA, commensurate management with other resources and resource use. ERMAs are designated in the geographic area managed by the BLM Needles Field Office in the CDCA and include approximately 903,000 acres. There are two ERMAs within the Project study area.      | <b>Comment:</b> References to ERMAs are from Segment 4, which has been removed from this project, therefore no ERMAs remain.<br><br><b>Recommended language:</b> Extensive Recreation Management Areas (ERMAs). ERMAs recognize existing recreation use, demand, or recreation and visitor services program investments and are managed to sustain principal recreation activities and associated qualities and conditions of the ERMA, commensurate management with other resources and resource use. ERMAs are designated in the geographic area managed by the BLM Needles Field Office in the CDCA and include approximately 903,000 acres. There are <del>two</del> <u>no</u> ERMAs within the Project study area. |

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| 3.13.1.1   | 3.13-2  | Special Recreation Management Areas (SRMAs). SRMAs are public lands units identified in land use plans to direct recreation funding and personnel to fulfill commitments made to provide specific structured recreation opportunities. There are seven SRMAs within the Proposed Project study area.   | <b>Recommended language:</b> Special Recreation Management Areas (SRMAs). SRMAs are public lands units identified in land use plans to direct recreation funding and personnel to fulfill commitments made to provide specific structured recreation opportunities. There are <del>seven</del> <u>six</u> SRMAs within the Proposed Project study area.  |
| 3.13.1.2   | 3.13-8  | As shown in Table 3.13-2 and Figure 3.13-2a through Figure 3.13-2c (BLM Land Designations Segment 1), the Segment 1 study area includes BLM-administered land within the Bishop RMP and the CDCA planning areas. Segment 1 crosses seven ACECs (Crater Mountain, Fossil Falls, Mohave Ground Squirrel, Olancha Greasewood, Owens Lake, Rose Spring, and Sierra Canyons ACECs), and three SRMAs (Alabama Hills, East Sierra, and Olancha SRMAs). As identified in Table 3.13-3, ACECs are areas designated to protect important natural resources and SRMAs are defined to recognize areas with high priority for outdoor recreation. | <b>Recommended language:</b> As shown in Table 3.13-2 and Figure 3.13-2a through Figure 3.13-2c (BLM Land Designations Segment 1), the Segment 1 study area includes BLM-administered land within the Bishop RMP and the CDCA planning areas. Segment 1 crosses <u>six</u> <del>seven</del> ACECs (Crater Mountain, Fossil Falls, Mohave Ground Squirrel, Olancha Greasewood, Owens Lake, <u>and</u> Rose Spring, <del>and Sierra Canyons ACECs</del> ), and three SRMAs (Alabama Hills, East Sierra, and Olancha SRMAs). As identified in Table 3.13-3, ACECs are areas designated to protect important natural resources and SRMAs are defined to recognize areas with high priority for outdoor recreation. |
| 3.15.2.2   | 3-15-7  | Source for Table 3.15-4: Caltrans, 2004  | <b>Recommended language:</b> Source for Table 3.15-4: <del>Caltrans, 2004</del> <u>Caltrans, 2020</u>  |
| 3.15.3.1   | 3-15-11 | Individual equipment and combined construction phase noise levels are predicted using a national model and construction equipment database in Version 2.0 the Roadway Construction Noise Model (RCNM) from the Federal Highway Administration (FHWA).  | <b>Recommended language:</b> Individual equipment and combined construction phase noise levels are predicted using a national model and construction equipment database in <del>Version 2.0</del> <u>Version 1.0</u> the Roadway Construction Noise Model (RCNM) from the Federal Highway Administration (FHWA).   |
| 3.18.1.1   | 3.18-1  | The Proposed Project would cross two types of federal lands: BLM land, and NPS land.   | <b>Recommended language:</b> The Proposed Project would cross <del>two types of federal</del> lands: BLM land, <u>and NPS land</u> .   |
| 3.18.1.1   | 3.18-1  | Additionally, BLM manages the Mojave Trails National Monument. The monument was designated in 2016 through Presidential Proclamation, to conserve, protect, and restore nationally significant cultural resources in the area (BLM, 2023b).  | <b>Recommended language:</b> <del>Additionally, BLM manages the Mojave Trails National Monument. The monument was designated in 2016 through Presidential Proclamation, to conserve, protect, and restore nationally significant cultural resources in the area (BLM, 2023b).</del>  |
| 3.18.1.1   | 3.18-1  | The National Park Service also manages federal public lands, and was established to protect natural and cultural resources, while providing for public use and enjoyment of these resources. Figure 3.18-1 (Overview of Recreation Areas) shows where BLM and NPS lands occur along the ROW.   | <b>Recommended language:</b> <del>The National Park Service also manages federal public lands, and was established to protect natural and cultural resources, while providing for public use and enjoyment of these resources. Figure 3.18-1 (Overview of Recreation Areas) shows where BLM and NPS lands occur along the ROW.</del>   |
| 3.19.1     | 3.19-7  | Railroad<br>There are no active rail lines in the vicinity of Segment 3S.  | Railroad<br>There are <del>no</del> active rail lines in the vicinity of Segment 3S.   |
| 3.19.3.3   | 3.19-19 | Based on the estimated workforce and daily truck trips to support construction, the Proposed Project is estimated to generate a total of approximately 300 daily roundtrips per day across the full I-C Project route (500 daily one-way trips) temporarily during construction.   | <b>Recommended language:</b> Based on the estimated workforce and daily truck trips to support construction, the Proposed Project is estimated to generate a total of approximately <u>250</u> <del>300</del> daily roundtrips per day across the full I-C Project route (500 daily one-way trips) temporarily during construction.  |
| 3.19.3.3   | 3.19-24 | As discussed above, based on the estimated workforce and daily truck trips to support construction, the Proposed Project is estimated to generate a total of approximately 300 daily roundtrips per day across the full I-C Project route (600 daily one-way trips) temporarily during construction.   | <b>Recommended language:</b> As discussed above, based on the estimated workforce and daily truck trips to support construction, the Proposed Project is estimated to generate a total of approximately <u>250</u> <del>300</del> daily roundtrips per day across the full I-C Project route ( <u>500</u> <del>600</del> daily one-way trips) temporarily during construction.   |
| 7.7        | 7-15    | Table 7-1 APM BIO-RES-1 references "PG&E."   | <b>Recommended language:</b> Change "PG&E" to "SCE"  |
| 7.7        | 7-16    | Table 7-1 APM BIO-RES-2 references "PG&E"  | <b>Recommended language:</b> Change "PG&E" to "SCE"  |
| Appendix 1 | PDF 39  | Segment 3N Strip Map Sheet 1 of 8: Kramer Sub is mislabeled as Inyokern Sub  | <b>Recommended language:</b> Change substation label to "Kramer Sub"   |
| Appendix 1 | PDF 47  | Segment 3S Strip Map Sheet 1 of 8: Kramer Sub is mislabeled as Inyokern Sub  | <b>Recommended language:</b> Change substation label to "Kramer Sub"   |