

April 17, 2026

Email Only

Mr. Boris Sanchez, CPUC Project Manager
c/o Environmental Science Associates
775 Baywood Drive; Suite 100, Petaluma, CA 94954
Via e-mail: CalCitySub@esaassoc.com

Subject: Southern California Edison's Comments on the Commission's Draft Environmental Impact Report for the Cal City Substation 115 kV Upgrade Project (A. 23-03-005)

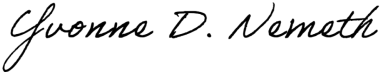
Dear Mr. Sanchez,

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 Cal City Substation 115 kV Upgrade Project*, State Clearinghouse No. 2023110218 (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.

Sincerely,



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

cc: Michelle Wilson, CPUC Program and Project Supervisor
Maria Hensel, ESA Senior Environmental Planner
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Lori Charpentier, Southern California Edison, Infrastructure Licensing Sr. Manager
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Tammy Lynn Jones, Southern California Edison, Senior Attorney

ATTACHMENT A
Draft Environmental Impact Report Comment Matrix

Cal City Substation 115 kV Upgrade Project

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Number	Project	Section	Page	DEIR Language	SCE Comment
1	Cal City	Executive Summary	ES-1	The Project would include an expansion of the existing SCE Cal City Substation to accommodate upgrades to transformers from 33/12 kilovolt (kV) to 115/33 kV along with other infrastructure and the associated installation of electrical equipment.	<p>Comment: As noted in Section 2.4.2 Substations of the Draft EIR, the Project includes installation of both 115 kV/33 kV and 115 kV/12 kV transformers. SCE requests the following change be included in Section ES.1 Introduction, as follows:</p> <p>Proposed Revision: "The Project would include an expansion of the existing SCE Cal City Substation to accommodate upgrades to transformers from 33/12 kilovolt (kV) to 115/33 kV <u>and 115/12 kV</u> along with other infrastructure and associated installation of electrical equipment."</p>
2	Cal City	Executive Summary	ES-5	Table ES-1: Anticipated Permits and Approvals	<p>Comment: SCE requests the following clarifications be made to Table ES-1, Anticipated Permits and Approvals:</p> <p>Proposed Revision to Table ES-1:</p> <ul style="list-style-type: none"> • Please add U.S. Fish and Wildlife Service <u>and U.S. Bureau of Land Management</u> for the Programmatic Biological Opinion Permit, as BOs are issued by USFWS to the federal lead agency for Section 7 Federal Endangered Species Act Consultation. • USFWS Biological Opinion Trigger: Potential impact to a federally listed threatened or endangered species <u>or to critical habitat</u>. • CDFW Consistency Determination Trigger: Required <u>Permittee may request a Consistency Determination from CDFW</u> if the project may result in take of a species that is both federally and state listed (e.g., desert tortoise) <u>and USFWS has issued a BO for the species</u>. • CDFW Consistency Determination Timing: CDFW has 30 days from receipt of the request to review the USFWS BO <u>and decide whether to</u> issue a consistency determination. • California Department of Fish and Wildlife, California Fish and Game Code Section 2081 Take Permit: Required if the project may result in take of a state-only <u>CESA</u> listed endangered or threatened species (e.g., Mohave ground squirrel, western Joshua tree) • Suggested footnote on SWRCB Waste Discharge Requirements, stating: <u>No federally jurisdictional waters have been identified that may be impacted by the Project at this time. However, should changes to the definition of "waters of the United States" occur prior to construction of the Project, a Federal Clean Water Act Section 404 Discharge Permit may be required from the United States Army Corps of Engineers for construction and operation that may result in discharge of dredge or fill material to waters of the United States.</u>

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Number	Project	Section	Page	DEIR Language	SCE Comment
3	Cal City	1.5, Public Review and Comment	1-7	Table 1-2: Summary of Potential Permit Requirements	<p>Comment: SCE requests the following clarifications be made to Table 1-2, Summary of Potential Permit Requirements:</p> <p>Proposed Revision:</p> <ul style="list-style-type: none"> Federal Clean Water Act Section 404 Discharge Permit: While not included in the table, SCE recommends a footnote be added to the table indicating the following: <u>"No federally jurisdictional waters have been identified that may be impacted by the Project at this time. However, should changes to the definition of "waters of the United States" occur prior to construction of the Project, a Federal Clean Water Act Section 404 Discharge Permit may be required from the United States Army Corps of Engineers for construction and operation that may result in discharge of dredge or fill material to waters of the United States."</u> State Endangered Species Consultation (California Endangered Species Act, California Fish and Game Code Sections 2050 et seq., 3511, and 1900-1913): The Jurisdiction/Purpose should be revised to note, "Construction, operation, and maintenance that may effect <u>take</u> a state-CESA-listed or candidate species or its habitat, incidental take authorization (if required)" State Lake and Streambed Alteration (Section 1600): The Jurisdiction/Purpose should be revised to note: "Construction and operation that may <u>substantially divert or obstruct, change the bed, channel, or bank, use material from, or deposit or dispose of material into any river, stream, or lake have an impact on wetlands or other jurisdictional waterways."</u> State Waste Discharge Requirements (WDR) or Clean Water Action Section 401 Certification: This permit from the Regional Water Quality Control Board should be added with the following Jurisdiction/Purpose: <u>"Construction and operation that may result in discharge of dredge or fill material to waters of the State."</u>
4	Cal City	2.5.2.1, Cal City Substation Improvements	2-16	<p>Relocation of Battery Energy Storage System Connection</p> <p>Also, SCE is planning to build and operate a battery energy storage system (BESS) to provide additional short-term loading capacity for the Cal City ENA before the Project comes online. The BESS and the Project have independent utility and these projects are neither connected nor reliant upon each other (SCE 2023b). The BESS is proposed on the adjacent parcel immediately south of the existing Cal City Substation. The BESS is not included in the scope of the Project. However, implementation of the Project would require relocating the connection of the BESS from the existing 12 kV switchrack at the Cal City Substation to the new 12 kV switchrack at the expanded Cal City Substation.</p>	<p>Comment: Since submittal of the Proponent's Environmental Assessment (PEA) in March 2023, the proposed battery energy storage system (BESS) project near Cal City Substation has been cancelled. Relocation of the BESS connection to the new 12 kV switchrack at the expanded Cal City Substation would no longer be required. Additionally, the "SCE Battery Energy Storage System" included as Cumulative Project #6 in Table 3.0-1 can be removed, and the BESS project can be removed from the cumulative analysis throughout the Draft EIR.</p>
5	Cal City	2.5.2.1, Cal City Substation Improvements	2-19	<p>Lastly, the proposed Cal City Substation facility would be enclosed on all sides by an 8-foot-high security metal fence system with an additional approximately 18-inch-tall top guard.</p>	<p>Comment: SCE requests the following revision to clarify the nature of the proposed fencing enclosing the proposed substation facility:</p> <p>Proposed Revision: "Lastly, the proposed Cal City Substation facility would be enclosed on all sides by an 8-foot-high <u>galvanized</u> security <u>expanded</u> metal fence system with an additional approximately 18-inch-tall top guard."</p>

Cal City Substation 115 kV Upgrade Project

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6	Cal City	2.5.2.1, Cal City Substation Improvements	2-19	As part of the Project, one 28-foot vehicular gate and a 4- to 5-foot personnel pedestrian gate would be installed at the primary entrance to the Cal City Substation property, and two 20-foot vehicular access gates would be installed at the secondary northern and southern parcels.	<p>Comment: SCE requests the following revision to clarify proposed gates at the Cal City Substation, which are reflected on Figure 2-6, Proposed Fencing and Distribution Getaways for Cal City Substation, of the Draft EIR:</p> <p>Proposed Revision: "As part of the Project, one <u>primary</u> 28-foot vehicular gate, <u>one secondary 20-foot vehicular gate</u>, and a 4- to 5-foot personnel pedestrian gate would be installed at the primary entrance to the Cal City Substation property, and two 20-foot vehicular access gates would be installed at the secondary northern and southern parcels."</p>
7	Cal City	2.5.2.2, Edwards Substation Improvements	2-19	Proposed improvements at the Edwards Substation would consist of installing equipment at one existing 115 kV line position and installing six 115 kV SF6 gas insulated circuit breakers within the substation.	<p>Comment: Similar to the scope of work described for Cal City Substation, SF6 gas insulated or vacuum circuit breakers may be used at Edwards Substation, Kramer Substation, and Holgate Switchyard. SCE requests the following edit be made to Section 2.5.2.2 Edwards Substation Improvements:</p> <p>Proposed Revision: "Proposed improvements at the Edwards Substation would consist of installing equipment at one existing 115 kV line position and installing six 115 kV SF6 gas insulated <u>or vacuum</u> circuit breakers within the substation."</p>
8	Cal City	2.5.2.3, Holgate Switchyard Improvements	2-20	Proposed improvements at the Holgate Switchyard would consist of installing equipment at one existing 115 kV line position and installing two 115 kV SF6 gas insulated circuit breakers within the switchyard.	<p>Comment: Similar to the scope of work described for Cal City Substation, SF6 gas insulated or vacuum circuit breakers may be used at Edwards Substation, Kramer Substation, and Holgate Switchyard. SCE requests the following edit be made to Section 2.5.2.3 Holgate Switchyard Improvements:</p> <p>Proposed Revision: "Proposed improvements at the Holgate Switchyard would consist of installing equipment at one existing 115 kV line position and installing two 115 kV SF6 gas insulated <u>or vacuum</u> circuit breakers within the switchyard."</p>
9	Cal City	2.5.2.4, Kramer Substation Improvements	2-20	Proposed improvements at the Kramer Substation would consist of installing equipment at one existing 115 kV line position and installing three 115 kV SF6 gas insulated circuit breakers within the substation.	<p>Comment: Similar to the scope of work described for Cal City Substation, SF6 gas insulated or vacuum circuit breakers may be used at Edwards Substation, Kramer Substation, and Holgate Switchyard. SCE requests the following edit be made to Section 2.5.2.4 Kramer Substation Improvements:</p> <p>Proposed Revision: "Proposed improvements at the Kramer Substation would consist of installing equipment at one existing 115 kV line position and installing three 115 kV SF6 gas insulated <u>or vacuum</u> circuit breakers within the substation."</p>

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10	Cal City	2.7.4.5, Grading	2-35	Table 2-5 Proposed Earthwork Volumes	<p>Comment: Table 2-5 Proposed Earthwork Volumes indicates cut and fill quantities associated with work at Cal City Substation as 34,000 cubic yards (cy) of cut and 34,000 cy of fill, to be balanced onsite. Refinement of rough grading plans since submittal of the Proponent's Environmental Assessment (PEA) in March 2023 indicate cut and fill quantities at Cal City Substation may be approximately 45,000 cy of cut and 45,000 cy of fill. SCE requests that Table 2-5 be updated to reflect this revised grading estimate based on updated engineering and design.</p> <p>All soil would remain balanced onsite as noted in Table 2-5 of the Draft EIR. Furthermore, changes to the proposed construction equipment list, equipment use, and schedule are not anticipated as a result of this change to rough grading quantities.</p> <p>Proposed Revision to Table 2-5:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th colspan="4" style="font-size: small;">TABLE 2-5 PROPOSED EARTHWORK VOLUMES</th> </tr> <tr> <th style="width: 60%;">Project Component</th> <th style="width: 15%;">Estimated Cut (cubic yards)</th> <th style="width: 15%;">Estimated Fill (cubic yards)</th> <th style="width: 10%;">Estimated Import/Export (cubic yards)^a</th> </tr> </thead> <tbody> <tr> <td colspan="4" style="background-color: #f2f2f2;">Proposed Kramer–Cal City 115 kV Subtransmission Line</td> </tr> <tr> <td>Earthwork (New Access Road and O&M Structure Pads)</td> <td>154,000</td> <td>154,000</td> <td>0</td> </tr> <tr> <td colspan="4" style="background-color: #f2f2f2;">Proposed Cal City–Edwards-Holgate 115 kV Subtransmission Line</td> </tr> <tr> <td>Earthwork (New Access Road and O&M Structure Pads)</td> <td>108,000</td> <td>108,000</td> <td>0</td> </tr> <tr> <td colspan="4" style="background-color: #f2f2f2;">Cal City Substation</td> </tr> <tr> <td>Earthwork</td> <td>45,000</td> <td>45,000</td> <td>0</td> </tr> </tbody> </table> <p style="font-size: x-small;">NOTES: kV = kilovolt; O&M = operation and maintenance a. For all components of the Cal City Substation 115 kV Upgrade Project, soil is proposed to be balanced on-site, aside from removal/export of organic material generated from clearing and grubbing activities. SOURCE: SCE 2023a and 2024a</p>	TABLE 2-5 PROPOSED EARTHWORK VOLUMES				Project Component	Estimated Cut (cubic yards)	Estimated Fill (cubic yards)	Estimated Import/Export (cubic yards) ^a	Proposed Kramer–Cal City 115 kV Subtransmission Line				Earthwork (New Access Road and O&M Structure Pads)	154,000	154,000	0	Proposed Cal City–Edwards-Holgate 115 kV Subtransmission Line				Earthwork (New Access Road and O&M Structure Pads)	108,000	108,000	0	Cal City Substation				Earthwork	45,000	45,000	0
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11	Cal City	2.7.5.1, Pole and H-Frame Installation	2-38	<p>Wood Pole Topping The Project may include pole topping where existing distribution and telecommunications lines are present. Where distribution underbuild is proposed, existing distribution infrastructure (e.g., distribution conductor, transformers) may be transferred onto the new subtransmission structures, leaving telecommunications lines temporarily in place on the existing distribution poles. In that case, the pole may be topped at the telecommunications line level (i.e., a portion of the existing distribution pole may be removed where it exists above the telecommunications line) until the existing telecommunications line is transferred to a new structure and the distribution pole could be completely removed.</p>	<p>Comment: As noted in the Proponent’s Environmental Assessment submitted by SCE for the Project, pole topping may be temporary, unless the pole continues to be used for the telecommunications infrastructure only. Once SCE removes its line from the existing structure, the third-party telecommunications utility may elect to keep telecommunications line in-place on the existing, topped off structures. SCE cannot remove third-party lines or structures without permission from the third-party telecommunications utility.</p>																																

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12	Cal City	2.7.6.1, Grading and Drainage	2-41	In addition, civil work at the Cal City Substation would include construction of a new concretelined drainage channel that would extend along the southerly, westerly, and northerly sides of the expanded substation property. The 62-foot-wide channel would capture flows from the west and south off-site tributary area (run-on) and would route flows around the Project infrastructure, conveying flows to a riprap area where a concrete wet crossing would allow a natural flow path outfall to an existing discharge point at the northeast corner of the property, on 90th Street. Sheet flow would be from west to east. A 5-foot-wide, 1-foot-deep concrete-lined channel would be constructed along the easterly side of the property between the fence and 90th Street. Concrete culverts measuring 2 feet by 4 feet would be installed under each proposed driveway. An approximately 100-foot-long, 50-foot-wide, 5-foot-deep basin would be installed for water quality and runoff reduction. Engineered spill containment structures are included at the Cal City Substation as part of the Project for the six proposed transformers.	<p>Comment: Since submittal of the Proponent's Environmental Assessment (PEA) in March 2023, minor refinements to the drainage plan for the expanded Cal City Substation have occurred. Specifically, the location of a proposed retention and infiltration basin has been shifted slightly to be located within a proposed riprap area at the northeastern portion of the substation property. Similar to the originally described 100-foot-long, 50-foot-wide, 5-foot-deep basin, the relocated basin would be installed for water quality and reduction of runoff. SCE requests the following revision be made to Section 2.7.6.1, Grading and Drainage, of the Draft EIR.</p> <p>Proposed Revision: "In addition, civil work at the Cal City Substation would include construction of a new concrete-lined drainage channel that would extend along the southerly, westerly, and northerly sides of the expanded substation property. The 62-foot-wide channel would capture flows from the west and south off-site tributary area (run-on) and would route flows around the Project infrastructure, conveying flows to a riprap area where a concrete wet crossing would allow a natural flow path outfall to an existing discharge point at the northeast corner of the property, on 90th Street. <u>A retention and infiltration basin with retaining walls would be added to the riprap area at Cal City Substation to improve water quality and manage stormwater runoff. The basin will collect, hold, and infiltrate runoff, enhancing site drainage. Retaining walls would ensure the basin retains its shape and functions effectively as part of the substation's drainage improvements.</u> Sheet flow would be from west to east. A 5-foot-wide, 1-foot-deep concrete-lined channel would be constructed along the easterly side of the property between the fence and 90th Street. Concrete culverts measuring 2 feet by 4 feet would be installed under each proposed driveway. An approximately 100-foot long, 50-foot wide, 5-foot deep basin would be installed for water quality and runoff reduction. Engineered spill containment structures are included at the Cal City Substation as part of the Project for the six proposed transformers."</p>
13	Cal City	2.8.2, Demobilization and Site Restoration	2-62	The staging area would then be returned to its preconstruction condition or would be subject to restoration as described below.	<p>Comment: Consistent with Section 3.5.2.2.1 of the PEA submitted by SCE in March 2023, SCE requests the following edit be made to Section 2.8.2, Demobilization and Site Restoration, of the Draft EIR:</p> <p>Proposed Revision: "The staging area would then be returned to its preconstruction condition or would be subject to restoration as described below, <u>unless otherwise agreed upon with the property owner.</u>"</p>
14	Cal City	2.8.2, Demobilization and Site Restoration	2-63	Should any damage to landscaping (outside of SCE easements) on private parcels occur, SCE would make suitable compensation for that damage (negotiated on a case-by-case basis).	<p>Comment: SCE negotiates construction access and compensation with landowners on a case-by-case basis. This language, while potentially accurate, is not relevant to the analysis of potential environmental impacts of the Project. SCE recommends removing this language from Section 2.8.2, Demobilization and Site Restoration, of the Draft EIR.</p>
15	Cal City	2.11.1, Permits and Approvals	2-68	Table 2-9, Anticipated Permits and Approvals	<p>Comment: SCE requests the following clarifications be made to Table 2-9, Anticipated Permits and Approvals:</p> <p>Proposed Revision to Table 2-9:</p> <ul style="list-style-type: none"> • CDFW Consistency Determination Trigger: Required <u>Permittee may request a Consistency Determination from CDFW</u> if the project may result in take of a species that is both federally and state listed (e.g., desert tortoise) <u>and USFWS has issued a BO for the species.</u> • CDFW Consistency Determination Timing: CDFW has 30 days from receipt of the request to review the USFWS BO and <u>decide whether to</u> issue a consistency determination. • CDFW 2081 Take Permit Trigger: Required if the project may result in take of a state-only <u>CESA</u> listed endangered or threatened species (e.g., Mohave ground squirrel, western Joshua tree)

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16	Cal City	Figure 2-26 (Map 14 of 14)	2-110	Figure 2-26	Comment: Figure 2-26, Project Index Map (Map 14 of 14) shows an "Existing 115 kV Transmission Line" extending north of Holgate Switchyard along Borax Road. SCE data does not show a 115 kV circuit along that corridor; rather, a portion of the Isner 33 kV Distribution Line follows along Borax Road north of Holgate Switchyard. SCE requests this figure be revised to remove the existing 115 kV subtransmission line shown north of Holgate Switchyard.
17	Cal City	3.4, Biological Resources	3.4-61	<p>Mitigation Measure 3.4-1b: Special-Status Herbaceous Plants Compensatory Mitigation and Restoration.</p> <p>...</p> <p>Performance Criteria.</p> <p>1. Vegetation Establishment:</p> <p>...</p> <ul style="list-style-type: none"> • Invasive species shall not exceed 5 percent cover in any monitoring year. 	<p>Comment: SCE suggests revising the Performance Criteria for Mitigation Measure 3.4-1b as follows to account for site-specific baseline conditions:</p> <p>Proposed Revision: "Invasive species shall <u>be similar to baseline conditions</u> not exceed 5 percent cover in any all monitoring years."</p>
18	Cal City	3.4, Biological Resources	3.4-60	<p>Mitigation Measure 3.4-1b: Special-Status Herbaceous Plants Compensatory Mitigation and Restoration</p> <p>The types of compensation specified in APM BIO-BOT-1—purchase of credit in an established mitigation bank, acquisition of conservation easements, or direct purchase and preservation of compensation lands—may be used to mitigate impacts on special status plants. However, if on-site restoration is infeasible or unsuccessful, compensation will be required to offset impacts on special-status plants (ranked CRPR 1 or 2). Such compensation will include purchasing credits or acquiring, preserving, and protecting existing populations at a minimum 3:1 ratio, or as otherwise specified by resource agencies, to reduce the potential significant impact on habitat to a less-than-significant level. SCE must coordinate with CDFW (or BLM, depending upon land ownership) and request that the agency review and accept the proposed compensatory mitigation involving off-site conservation.</p> <p>...</p>	<p>Comment: SCE requests the following edits to Mitigation Measure 3.4-1b to account for mitigation associated with potential state or federal species permit conditions, if required.</p> <p>Proposed Revision: "The types of compensation specified in APM BIO-BOT-1—purchase of credit in an established mitigation bank, acquisition of conservation easements, or direct purchase and preservation of compensation lands—may be used to mitigate impacts on special status plants. However, if on-site restoration is infeasible or unsuccessful, compensation will be required to offset impacts on special-status plants (ranked CRPR 1 or 2). Such compensation will include purchasing credits or acquiring, preserving, and protecting existing populations at a minimum 3:1 ratio, or as otherwise specified by resource agencies, to reduce the potential significant impact on habitat to a less-than-significant level. SCE must coordinate with CDFW (or BLM, depending upon land ownership) and request that the agency review and accept the proposed compensatory mitigation involving off-site conservation. <u>Mitigation implemented to satisfy other regulatory requirements (e.g., state or federal permits for special-status species or jurisdictional waters) may be credited toward meeting the compensatory mitigation requirements of this measure, where appropriate and subject to approval by the applicable resource agencies. Where the Project is covered under the Western Joshua Tree (WJT) Incidental Take Permit (ITP), compliance with the ITP mitigation requirements shall satisfy this measure.</u>"</p>
19	Cal City	3.4, Biological Resources	3.4-60	<p>Mitigation Measure 3.4-1b: Special-Status Herbaceous Plants Compensatory Mitigation and Restoration</p>	<p>Comment: SCE requests inclusion of the following clause in the Performance Criteria section of Mitigation Measure 3.4-1b:</p> <p>Proposed Revision: <u>"If an unanticipated 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 discuss options to adjust success standards accordingly with relevant agencies."</u></p>
20	Cal City	3.4, Biological Resources	3.4-63	<p>Crotch's bumble bee has been designated by CDFW as a candidate for listing under FESA, and any impact on this species requires take authorization from CDFW.</p>	<p>Comment: SCE requests the following revision to clarify the listing status of Crotch's bumble bee in the Draft EIR:</p> <p>Proposed Revision: "Crotch's bumble bee has been designated by CDFW as a candidate for listing under FESA-CESA, and any impact on this species requires take authorization from CDFW."</p>

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Number	Project	Section	Page	DEIR Language	SCE Comment
21	Cal City	3.4, Biological Resources	3.4-68	<p>Mitigation Measure 3.4-2a: Crotch’s Bumble Bee. A habitat assessment shall be completed by a qualified biologist with demonstrated knowledge of the requirements of Crotch’s bumble bee. If no suitable habitat for this species is identified within 300 feet of proposed construction activity areas, no further measures are required. If a qualified biologist has evaluated the property and found suitable foraging or nesting habitat for Crotch’s bumble bee within 300 feet of proposed construction activity areas, SCE shall retain a qualified entomologist to conduct surveys to determine presence or absence in accordance with the most current protocols established by CDFW (currently, the <i>Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species</i>).</p> <p>If Crotch’s bumble bee or nests are detected, SCE shall consult with CDFW to develop adequate take avoidance measures, which may include protections for underground overwintering queens. If impacts on this species cannot be avoided, SCE shall obtain the appropriate take authorization from CDFW (pursuant to Fish and Game Code Section 2080 et seq.). Early consultation is required, as modification to the Project and mitigation measures may be required to obtain an incidental take permit.</p>	<p>Comment: Crotch’s bumble bee is afforded protections under the California Endangered Species Act (CESA) while it is a candidate for listing. If the species is no longer a candidate for listing and is not listed, it would not be protected under CESA. In this situation, there would be no mechanism for SCE to obtain “take” authorization for the Crotch’s bumble bee. As such, SCE requests the following clause be added to Mitigation Measure 3.4-2a:</p> <p>Proposed Revision: <u>“If the California Fish and Game Commission (CFGC) determines that listing Crotch’s bumble bee (CBB) under the California Endangered Species Act (CESA) is not warranted prior to the start of construction, this mitigation measure shall no longer apply.”</u></p>
22	Cal City	3.4, Biological Resources	3.4-68	<p>Mitigation Measure 3.4-2b: Raven Management to Protect Desert Tortoise. SCE shall develop and implement a raven management plan (RMP) for the Project, subject to review and approval by the CPUC and relevant wildlife agencies, to be deployed during the Project’s construction and operation and maintenance phases. The purpose of the RMP is to reduce avian predation on juvenile desert tortoises by employing deterrent strategies that specifically target ravens known to prey on tortoises. The plan will not be designed to broadly eliminate or control raven populations.</p> <p>The RMP shall follow an adaptive management approach to reduce trash, debris, microtrash, and organic waste that may attract ravens during construction; and shall remain in place after Project completion. The RMP will be evaluated after 3 years of implementation, or sooner if evidence of avian predation emerges. Key components of the RMP may include (1) monitoring power lines to discourage raven nesting; (2) funding targeted raven control efforts in cooperation with the U.S. Department of Agriculture; and (3) if an issue is identified, using alternative raven control strategies developed in coordination with USFWS and/or CDFW (e.g., egg-addling, nesting habitat removal). The RMP shall include specific measures to limit raven subsidies during Project construction and during post-construction operation. Such measures will include a trash collection and management system that ensures the proper disposal of food and other trash in self-closing, sealable trash containers, and the regular inspection and removal of trash receptacles to avoid attracting tortoise predators; removal of road-killed animals or other carcasses within the Project area during construction activities; raven nest management, removal, and the use of nesting deterrents during and after construction; and post-construction raven nest surveys on SCE facilities, nest monitoring, and removal for a period of 3 years after Project completion</p>	<p>Comment: Mitigation Measure 3.4-2b requires SCE to prepare a raven management plan (RMP) for review and approval by the CPUC and relevant wildlife agencies. SCE maintains a Programmatic Raven Management Plan developed in coordination with the U.S. Fish and Wildlife Service, U.S. Bureau of Land Management, U.S. Forest Service, National Park Service, California Department of Fish and Wildlife, and other entities to address common ravens associated with utility infrastructure impact on desert tortoise. Construction-related raven management activities, such as trash disposal, are covered by Applicant Proposed Measure BIO-HERP-1. SCE recommends Mitigation Measure 3.4-2b be redrafted as follows:</p> <p>Proposed Revision: <u>“Mitigation Measure 3.4-2b: Raven Management to Protect Desert Tortoise.</u> <u>Upon completion of construction, SCE will incorporate the Project into the SCE Programmatic Raven Management Plan by adding funding to the annual budget based on the number of 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>

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23	Cal City	3.4, Biological Resources	3.4-68	<p>Mitigation Measure 3.4-2c: Nesting Bird Management Plan. In addition to the requirements of APM BIO-AVI-2, the nesting bird management plan shall be prepared by a qualified biologist and submitted for CPUC review at least 30 days before the start of construction activities. In addition to the commitments described in APM BIO-AVI-2, the plan shall include the following provisions:</p> <ul style="list-style-type: none"> • If a nest is suspected but not confirmed, the qualified biologist shall establish a no disturbance buffer until additional surveys can be completed or until the location can be inferred based on observations. If a nest is observed but thought to be inactive, the qualified biologist shall monitor the nest for 1 hour (4 hours for raptors during the non-breeding season) before approaching the nest to determine status. The qualified biologist shall use their best professional judgment regarding the monitoring period and whether approaching the nest is appropriate. • Appropriate buffer distances, as stipulated in the nesting bird management plan, are generally 300 feet for passerine species and 500 feet for listed special-status birds and raptors; however, these recommended buffer distances may be increased or reduced at the discretion of the qualified biologist depending on site-specific factors such as the location of the nest and the species' tolerance to human presence. • If construction temporarily ceases for a period greater than 7 days and activities resume during the avian nesting season, the Project site and buffer areas shall be resurveyed 	<p>Comment: Mitigation Measure 3.4-2c requires preparation of a Nesting Bird Management Plan for review by the CPUC prior to the start of construction activities. SCE recommends descriptions of appropriate buffer distances be reserved for the Project's NBMP and suggests the following revisions to Mitigation Measure 3.4-2c:</p> <p>Proposed Revision: "Mitigation Measure 3.4-2c: Nesting Bird Management Plan. In addition to the requirements of APM BIO-AVI-2, the nesting bird management plan shall be prepared by a qualified biologist and submitted for CPUC review at least 30 days before the start of construction activities. In addition to the commitments described in APM BIO-AVI-2, the plan shall include the following provisions:</p> <ul style="list-style-type: none"> • If a nest is suspected but not confirmed, the qualified biologist shall establish a no disturbance buffer until additional surveys can be completed or until the location can be inferred based on observations. If a nest is observed but thought to be inactive, the qualified biologist shall monitor the nest for 1 hour (4 hours for raptors during the non-breeding season) before approaching the nest to determine status. The qualified biologist shall use their best professional judgment regarding the monitoring period and whether approaching the nest is appropriate. • Appropriate buffer distances, <u>as shall be stipulated in the nesting bird management plan and based on general tolerances by groups of species.</u> are generally 300 feet for passerine species and 500 feet for listed special-status birds and raptors; however, These recommended buffer distances may be increased or reduced at the discretion of the qualified biologist depending on site-specific factors such as the location of the nest and the species' tolerance to human presence. • If construction temporarily ceases for a period greater than 7 days and activities resume during the avian nesting season, the Project site and buffer areas shall be resurveyed."

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24	Cal City	3.4, Biological Resources	3.4-72 – 3.4-73	<p>Mitigation Measure 3.4-3: APMs and Protection Measures Applicable during Operation and Maintenance Activities. For all operation and maintenance activities within potential habitat for special-status wildlife species, the following APMs shall be applied:</p> <ul style="list-style-type: none"> • APM ENV-GEN-1 WEAP, Worker’s Environmental Awareness Training Program. • APM BIO-AVI-2, Nesting Bird Management Plan. <p>If ground disturbance is required in areas that provide habitat for special-status wildlife species, the following APMs and mitigation measures shall also be applied:</p> <ul style="list-style-type: none"> • APM BIO-GEN-1, Pre-construction Biological Clearance Surveys and Monitoring. • APM BIO-HERP-1, Desert Tortoise. • APM BIO-MAM-1, Mohave Ground Squirrel. • APM BIO-MAM-2, Desert Kit Fox Preconstruction Surveys. • APM BIO-RES-1, Develop and Implement Habitat Restoration Plan (HRP). • Mitigation Measure 3.4-2a, Crotch’s Bumble Bee. • Mitigation Measure 3.4-2b, Raven Management to Protect Desert Tortoise. • Mitigation Measure 3.4-2d, Burrowing Owl. • Mitigation Measure 3.4-2e, Mohave Ground Squirrel Protection. • Mitigation Measure 3.4-2f, American Badger Protection. 	<p>Comment: Mitigation Measure 3.4-3 has been incorporated to reduce potential impacts associated with operation of the Project to special-status plant and wildlife species (Impact 3.4-3), riparian habitat and other sensitive natural communities (Impact 3.4-4), movement of migratory wildlife species or migratory wildlife corridors (Impact 3.4-6), and associated cumulative impacts (Impacts C.3.4-3, C.3.4-4, and C.3.4-6). Mitigation Measure 3.4-3 requires implementation of various Applicant Proposed Measures (APMs) and Mitigation Measures during operation and maintenance of the Project.</p> <p>The APMs and Mitigation Measures included in the Draft EIR are tailored to construction activities associated with buildout of the Project. Potential environmental impacts associated with the Project would be most severe during construction and would diminish during operations, which would consist of minimal vehicle trips and activities associated with inspection and maintenance programs. However, SCE operations and maintenance activities undergo a robust environmental clearance process intended to review all activities for compliance with applicable environmental laws and regulations, including but not limited to the Federal and California Endangered Species Acts, Migratory Bird Treaty Act, Clean Water Act, Porter-Cologne Water Quality Control Act, and California Fish and Game Code. These statutes and regulations are intended to be protective of special-status plant and wildlife species, riparian habitat and other sensitive natural communities, and migratory wildlife species and corridors while accounting for shifting regulatory guidance and resource status. Furthermore, operations and maintenance activities are subject to various established environmental protocols and programs developed by SCE in concert with various resource agencies, including but not limited to SCE’s Programmatic Raven Management Plan and Avian Protection Program.</p> <p>Given the minimal nature of anticipated operations and maintenance activities and SCE’s established process for environmental review and clearance of such activities described above, SCE requests Mitigation Measure 3.4-3 be removed, as it is not necessary to reduce Project operational impacts to a less-than-significant level.</p>
25	Cal City	3.4, Biological Resources	3.4-70	<p>Mitigation Measure 3.4-2e: Mohave Ground Squirrel Protection. Within all areas identified as potential Mohave ground squirrel (MGS) habitat (see the Cal City Substation 115 kV Upgrade Project Biological Resources Technical Report, Appendix G), SCE shall presume the presence of MGS and implement the protection measures outlined in APM BIO-MAM-1, Mohave Ground Squirrel. SCE shall obtain MGS take authorization through a CDFW incidental take permit, which will encompass these and additional mitigation requirements. In accordance with the permit, the following avoidance and minimization measures shall also be implemented: ...</p>	<p>Comment: SCE is in the process of seeking a CDFW 2081(b) incidental take permit for the Project. The incidental take permit has yet to be issued; therefore, SCE requests the following revision to ensure consistency with future permit conditions:</p> <p>Proposed Revision: “Within all areas identified as potential Mohave ground squirrel (MGS) habitat (see the Cal City Substation 115 kV Upgrade Project Biological Resources Technical Report, Appendix G), SCE shall presume the presence of MGS and implement the protection measures outlined in APM BIO-MAM-1, Mohave Ground Squirrel. SCE shall obtain MGS take authorization through a CDFW incidental take permit, which will may encompass these and additional mitigation requirements. In accordance with the permit, the following avoidance and minimization measures shall may also be implemented:...”</p>

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26	Cal City	3.4, Biological Resources	3.4-70	<p>Mitigation Measure 3.4-2e: Mohave Ground Squirrel Protection.</p> <p>...</p> <ul style="list-style-type: none"> <i>Revegetation of Temporarily Disturbed Habitat:</i> To mitigate temporary impacts on MGS habitat, SCE shall revegetate disturbed areas in accordance with Mitigation Measure 3.4-4, <i>Sensitive Natural Communities</i>. Restoration efforts shall comply with the restoration requirements, performance standards, and maintenance and monitoring protocols outlined in Mitigation Measure 3.4-1d and the Sensitive Natural Community Mitigation and Monitoring Plan referenced in Mitigation Measure 3.4-4. 	<p>Comment: Mitigation Measure 3.4-2e references restoration requirements, performance standards, and maintenance and monitoring protocols outlined in Mitigation Measure 3.4-1d. However, the Draft EIR does not appear to contain a Mitigation Measure 3.4-1d. SCE suggests the following revision to Mitigation Measure 3.4-2e, assuming this measure is intended to cross-reference requirements of Mitigation Measure 3.4-1b:</p> <p>Proposed Revision:</p> <ul style="list-style-type: none"> <i>“Revegetation of Temporarily Disturbed Habitat:</i> To mitigate temporary impacts on MGS habitat, SCE shall revegetate disturbed areas in accordance with Mitigation Measure 3.4-4, <i>Sensitive Natural Communities</i>. Restoration efforts shall comply with the restoration requirements, performance standards, and maintenance and monitoring protocols outlined in Mitigation Measure 3.4-1b and the Sensitive Natural Community Mitigation and Monitoring Plan referenced in Mitigation Measure 3.4-4.”
27	Cal City	3.5, Cultural Resources	3.5-21	<p>Summary of Results</p> <p>Based on the archaeological and architectural historic-era identification and evaluation efforts conducted for the Project, 11 historical resources are present within or intersect the Project area. As summarized below, there are five historical-era architectural and seven pre-contact archaeological resources in the Project area that are eligible.</p>	<p>Comment: SCE recommends revising language to reflect findings in the Project’s Archaeological Resources Technical Report (Rincon 2025) and that this language be revised globally in the document when referring to the eligibility status of the seven pre-contact archaeological resources unevaluated in the ARTR that are being assumed eligible in the Draft EIR:</p> <p>Proposed Revision: “Based on the archaeological and architectural historic-era identification and evaluation efforts conducted for the Project, 11 historical-historic-era resources are present within or intersect the Project area. As summarized below, there are five historical-era architectural and seven pre-contact archaeological resources in the Project area that are <u>assumed</u> eligible.”</p>
28	Cal City	3.5, Cultural Resources	3.5-22	<p>Table 3.5-2, Historical Resources Identified in the Project Area</p>	<p>Comment: The National Register and California Register Eligibility column of Table 3.5-2, Historical Resources Identified in the Project Area, references seven pre-contact archaeological sites as eligible for the CRHR. SCE recommends revising language for each of these resources to reflect the findings in the Project’s ARTR (Rincon 2025), as follows, and that this language be revised globally in the document when referring to the eligibility status of unevaluated in the ARTR that are being assumed eligible in the Draft EIR:</p> <p>Proposed Revision to Table 3.5-2, National Register and California Register Eligibility Column: “Not previously evaluated; evaluated historic-era component determined as not eligible; Pre-contact component determined <u>assumed</u> eligible for the California Register”</p>

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29	Cal City	3.13, Noise	3.13-21	<p>Mitigation Measure 3.13-1a: Construction Noise Reduction Plan. SCE and/or its contractors shall develop a Construction Noise Reduction Plan for the residence near Borax Bill Park. The Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities. The Plan shall include, but not be limited to, the following measures for construction activities:</p> <ul style="list-style-type: none"> • Provide the residence with a “hotline” telephone number, which shall be attended during active construction working hours in order to register complaints. All complaints shall be logged noting date, time, complainants’ name, nature of complaint, and any corrective action taken. • Use construction noise barriers such as temporary sound walls, acoustic blankets, or other barriers to shield construction noise at the residence from activities involving heavy equipment. Heights and specifications of noise barriers shall be designed to ensure that the line of sight is broken between the active construction activities and the residence. • If nighttime construction activities are proposed to occur within 400 feet of the residence, SCE shall offer to provide the residents with temporary relocation for the duration of such activities. 	<p>Comment: Mitigation Measure 3.13-1a has been incorporated to reduce potential construction noise impacts to a residence near Borax Bill Park. SCE appreciates the need to reduce potential noise impacts during construction to noise-sensitive receptors. The mitigation measure requires that noise barriers be designed to ensure that the line of sight is broken between the active construction activities and the residence. However, subtransmission construction in the vicinity of this residence will involve setting lightweight steel poles and stringing conductor above the ground surface. SCE requests clarification in the measure that noise barriers be designed to ensure the line of sight is broken between ground-based noise sources during construction activities and the residence.</p> <p>Additionally, Mitigation Measure 3.13-1a requires SCE to offer residents with temporary relocation for the duration of nighttime construction activities within 400 feet of the residence. As described in Section 2.7.15.3, Schedule, of the Draft EIR, work is generally anticipated to occur between 6 a.m. and 7 p.m. Monday through Saturday. However, in some circumstances, work outside these hours may be required. In these instances, SCE must have flexibility during construction to extend work hours as necessary to adapt to changing conditions in the field while achieving necessary operating dates. Rather, SCE notes that implementation of the proposed "hotline" telephone number will allow SCE to take corrective action in response to resident concerns about nighttime work if needed.</p> <p>As such, SCE requests Mitigation Measure 3.13-1a be revised as follows:</p> <p>Proposed Revision: “SCE and/or its contractors shall develop a Construction Noise Reduction Plan for the residence near Borax Bill Park. The Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities. The Plan shall include, but not be limited to, the following measures for construction activities:</p> <ul style="list-style-type: none"> • Provide the residence with a “hotline” telephone number, which shall be attended during active construction working hours in order to register complaints. All complaints shall be logged noting date, time, complainants’ name, nature of complaint, and any corrective action taken. • Use construction noise barriers such as temporary sound walls, acoustic blankets, or other barriers to shield construction noise at the residence from activities involving heavy equipment. Heights and specifications of noise barriers shall be designed to ensure that the line of sight is broken between the active construction activities <u>on the ground</u> and the residence. • If nighttime construction activities are proposed to occur within 400 feet of the residence, SCE shall offer to provide the residents with temporary relocation for the duration of such activities.”

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30	Cal City	3.13, Noise	3.13-22	<p>Mitigation Measure 3.13-1b: Construction and O&M Helicopter Flight Restrictions. SCE shall ensure that Project helicopter construction and O&M activities do not occur within 3,600 feet of residences in California City or at any location during nighttime hours (i.e., 7 a.m. to 7 p.m.)</p>	<p>Comment: Mitigation Measure 3.13-1b imposes restrictions on construction and operations and maintenance (O&M) flight activities. As described in Section 2.9.3, Maintenance Programs, of the Draft EIR, O&M-related helicopter activities could include transportation of transmission line workers, delivery of equipment and materials to structure sites, structure placement, hardware installation, and conductor or OPGW stringing operations. Should urgent maintenance activities be required over the course of Project operation, SCE will require flexibility to ensure completion of timely O&M activities and maintenance of reliable service. Furthermore, it is not known where future residences may be located or constructed in the Project vicinity. If new residences are constructed adjacent to the Project in the future, this measure may be unnecessarily restrictive, particularly when considering the limited and infrequent use of helicopters anticipated for O&M activities. SCE requests the following changes to Mitigation Measure 3.13-1b to clarify the definition of “nighttime hours” and to allow flexibility for completion of Project O&M activities:</p> <p>Proposed Revision: Mitigation Measure 3.13-1b: Construction and O&M Helicopter Flight Restrictions. SCE shall ensure that Project helicopter construction and O&M activities do not occur within 3,600 feet of residences in California City or at any location during nighttime hours (i.e., 7 a.m. to 7 p.m.)</p>
31	Cal City	3.18, Tribal Cultural Resources	3.18-7	Impact 3.18-1: The Project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe.	<p>Comment: As described in the comment below, SCE recommends that, unless evidence is provided that Tribes have identified Tribal Cultural Resources through consultation with the CPUC, this impact be revised to note that the Project would not cause a substantial adverse change in the significance of a Tribal Cultural Resource. Absent Tribal input or other evidence pertaining to the cultural value of resources to a Tribe, there does not appear to be evidence to support a finding that the Project would result in a significant impact to Tribal Cultural Resources.</p>
32	Cal City	3.18, Tribal Cultural Resources	3.18-7	Seven of these resources (CalCity-S-063, CalCity-S-129, CalCity-S-142, CalCity-S-147, CalCity-S-154, CalCity-S-161, and CalCity-S-507) are eligible for the California Register and are also considered tribal cultural resources as they meet the requirements established in Public Resources Code Section 21074.	<p>Comment: The document states on Page 3.18-2 that none of the three Tribes who stated they want to consult on the Project have further responded or provided comments on the Project or resources the Project may impact.</p> <p>As defined under Public Resources Code (PRC) 21074, Tribal Cultural Resources Sites are defined as features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either: (A) included or determined to be eligible for inclusion in the California Register of Historical Resources; or (B) included in a local register of historical resources as defined in subdivision (k) of Section 5020.1. Section 21074 further provides that while a lead agency has the discretion to determine a resource significant, that determination must be supported by substantial evidence and must be in consideration of the significance of the resource to the tribes. (Cal Pub. Res. Code § 21074 (2).) Absent any evidence to the contrary, the CPUC should deem these resources insignificant.</p>

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33	Cal City	3.18, Tribal Cultural Resources	3.18-9	<p>Mitigation Measure 3.18-1: Public Interpretation Land Acknowledgement. SCE shall, in coordination with Consulting Native American tribes, design and implement a public interpretation land acknowledging that this project is built on indigenous land. The public interpretive land acknowledgement program may include a land acknowledgement, information on local Native Americans, or artwork, preferably by local Native American artists, to be included as part of public outreach and education about the project, such as project notifications sent to the public or project websites. Prior to completion of project construction, SCE shall prepare and implement land acknowledgement interpretation plan in consultation with affiliated local Native American representatives to guide the acknowledgment program. The plan shall be reviewed by CPUC and shall identify, as appropriate, the proposed location or distribution for the acknowledgment program to include project outreach materials such as project webpages or other online project education or notification outreach and the proposed content of the land acknowledgement public interpretation program. The detailed content, media, and other characteristics of such an interpretive program shall be coordinated by the Consulting Native American tribes and the CPUC, and be approved by CPUC. The final components of the public interpretation program shall be distributed following the agreed upon schedule in the public interpretation land acknowledgement plan. Tribal representatives shall be compensated for their work as identified in the agreed-upon scope of work for the plan.</p>	<p>Comment: As described in the comment above, SCE recommends that, unless substantial evidence is provided that Tribes have identified Tribal Cultural Resources through consultation with the CPUC, Impact 3.18-1 be revised to note that the Project would not cause a substantial adverse change in the significance of a Tribal Cultural Resource. Absent Tribal input or other evidence pertaining to the cultural value of resources to a Tribe, there does not appear to be evidence to support a finding that the Project would result in a significant impact to Tribal Cultural Resources, and this mitigation measure is not warranted.</p>
34	Cal City	3.20, Wildfire	3.20-12	<p>Although no measures have been proposed by SCE to address potential specific Project-related wildfire impacts, the Applicant has committed to constructing the Project in a manner consistent with SCE Standard Specifications No. SST8-2018 Transmission Line Project Fire Plan (SCE 2018), summarized below. SCE would also operate and maintain the Project in accordance with the 2023-2025 Wildfire Mitigation Plan. Refer to Appendix L, <i>Southern California Edison Wildfire Plans</i>.</p>	<p>Comment: Since submittal of the Proponent's Environmental Assessment (PEA) in March 2023, SCE has developed a new Wildfire Mitigation Plan (WMP). The SCE 2026-2028 Wildfire Mitigation Plan (Revision 3) was published on January 22, 2026 and is available online at https://www.sce.com/sites/default/files/AEM/Wildfire%20Mitigation%20Plan/2026-2028/SCE%202026-2028%20Base%20WMP%20R3%20(January%2022%2C%202026)a.pdf. SCE requests the following edit to Section 3.20.3, Applicant Proposed Measures and Best Management Practices, of the Draft EIR:</p> <p>Proposed Revision: “Although no measures have been proposed by SCE to address potential specific Project-related wildfire impacts, the Applicant has committed to constructing the Project in a manner consistent with SCE Standard Specifications No. SST8-2018 Transmission Line Project Fire Plan (SCE 2018), summarized below. SCE would also operate and maintain the Project in accordance with the 2023-2025 <u>2026-2028</u> Wildfire Mitigation Plan. Refer to Appendix L, <i>Southern California Edison Wildfire Plans</i>.”</p>

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35	Cal City	3.20, Wildfire	3.20-13	<p>Southern California Edison 2023-2025 Wildfire Mitigation Plan The primary goal of the SCE 2023-2025 Wildfire Mitigation Plan consistent with California Public Utilities Code section 8386(a) is as follows:</p> <p><i>Each electrical corporation shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment.</i></p> <p>The 2023-2025 Wildfire Mitigation Plan builds on successes of prior implementation efforts and incorporates lessons learned during recent years of extreme wildfire activity in various parts of California. The 2023-2025 Wildfire Mitigation Plan include the following strategies and programs:</p> <ul style="list-style-type: none"> • An enhanced, comprehensive grid hardening strategy anchored in advanced risk modeling and analytics. • Risk-informed inspection, repair, and replacement programs. • Continuation of comprehensive vegetation management and inspections. • Deployment of improved wildfire cameras, satellite imagery, and advanced technology, data, and risk analytics capabilities. • Emergency preparedness workforce training and aerial fire suppression resources. • Increased situational awareness and response. • Augmented activities for public safety power shut-offs, resilience and community engagement, particularly on behalf of under-represented groups and SCE access and functional needs (AFN) customers. • New implementation actions to address risks associated with transmission lines and secondary conductors. <p>The 2023-2025 Wildfire Mitigation Plan also quantifies circuit miles for covered conductors installed and undergrounding; high fire risk inspections and remediations (repairs); hazard tree identification and vegetation management clearances completed; public safety power shut-offs and windspeed risk modeling; weather stations installed; high-definition cameras, sectionalizing devices, and fuses; and resiliency programs, among other measures to proactively address fire risk associate with SCE systems (SCE 2024)</p>	<p>Comment: SCE requests the description of SCE's Wildfire Mitigation Plan (WMP) in Section 3.20.3, Applicant Proposed Measures and Best Management Practices, of the Draft EIR, be revised as follows to incorporated updates related to SCE's 2026-2028 WMP:</p> <p>Proposed Revision: “Southern California Edison 2023-2025 2026-2028 Wildfire Mitigation Plan The primary goal of the SCE 2023-2025 2026-2028 Wildfire Mitigation Plan consistent with California Public Utilities Code section 8386(a) is as follows: <i>Each electrical corporation shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment. The primary goal of SCE's WMP is to reduce the risk of wildfires associated with utility equipment and to reduce the scope, scale, frequency and impacts of Public Safety Power Shutoff (PSPS) events.</i></p> <p>The 2023-2025 2026-2028 Wildfire Mitigation Plan builds on successes of prior implementation efforts and incorporates lessons learned during recent years of extreme wildfire activity in various parts of California. The 2023-2025 2026-2028 Wildfire Mitigation Plan includes the following objectives strategies and programs:</p> <ul style="list-style-type: none"> • <u>Continue programmatic deployment of covered conductor and targeted undergrounding of distribution lines in SCE's High-Fire Risk Areas (HFRA) to reduce the likelihood that objects will contact powerlines and lead to an ignition, and to reduce the potential frequency of PSPS events.</u> An enhanced, comprehensive grid hardening strategy anchored in advanced risk modeling and analytics. • <u>Continue and expand transmission hardening programs such as proactive splice shunting, enhanced design standards, and evaluation of additional approaches to address ignition drivers on the transmission system.</u> Risk-informed inspection, repair, and replacement programs. • <u>Continue execution of protection programs (e.g., Remote Earth Fault Current Limiters, Distribution Open Phase Detection [DOPD], and fast curve settings) to detect fault current and minimize ignition likelihood.</u> Continuation of comprehensive vegetation management and inspections. • <u>Execute risk-informed inspections of utility assets for the distribution and transmission system that identify, prioritize, and resolve issues that pose potential ignition sources.</u> Deployment of improved wildfire cameras, satellite imagery, and advanced technology, data, and risk analytics capabilities. • <u>Execute utility vegetation management programs to maintain clearances around utility lines, reducing the potential for ignitions due to vegetation contact with energized lines.</u> Emergency preparedness workforce training and aerial fire suppression resources. • <u>Maintain and enhance SCE's extensive network of weather stations, HD cameras, and associated meteorological functions to provide situational awareness to SCE and to external parties such as fire suppression agencies.</u> Increased situational awareness and response. • <u>Provide effective and accurate communications to the public before, during, and after major outages, PSPS events, and emergencies with information and resources to mitigate potential safety and economic impacts.</u> Augmented activities for public safety power shut-offs, resilience and community engagement, particularly on behalf of under-represented groups and SCE access and functional needs (AFN) customers. • <u>Maintain a comprehensive, all-hazards planning and preparedness program to provide effective emergency response, safely and expeditiously restore service during and after a major event, and communicate effectively with customers, stakeholders, and agency partners.</u> New implementation actions to address risks associated with transmission lines and secondary conductors.
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Cal City Substation 115 kV Upgrade Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Number	Project	Section	Page	DEIR Language	SCE Comment
					The 2023-2025 Wildfire Mitigation Plan also quantifies circuit miles for covered conductors installed and undergrounding; high fire risk inspections and remediations (repairs); hazard tree identification and vegetation management clearances completed; public safety power shut-offs and windspeed risk modeling; weather stations installed; high definition cameras, sectionalizing devices, and fuses; and resiliency programs, among other measures to proactively address fire risk associated with SCE systems (SCE 2024).”
36	Cal City	4.6.2.1, Description	4-27	Due to the existing electrical and telecommunication facilities located on the wood poles that support the Isner 33 kV distribution line adjacent to U.S. 395, the first 3 miles of the collocation alternative north of the Kramer Substation would be within the proposed Cal City Project alignment in order to increase construction efficiency and to reduce the potential for necessary 115 kV circuit outages to the existing Kramer-Inyokern #1 115 kV circuit when that segment of line would be in construction (SCE 2025a).	Comment: 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).