June 28, 2024

VIA EMAIL

Mr. Tommy Alexander
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

RE: Response No. 1 to Data Request No. 1 for LS Power Grid California, LLC's Power the South Bay Project (Application 24-05-014)

Dear Mr. Alexander:

As requested by the California Public Utilities Commission (CPUC), LS Power Grid California, LLC (LS Power) has collected and provided the additional information that is needed to adequately conduct the California Environmental Quality Act (CEQA) review for the Power the South Bay Project (Proposed Project). This letter includes the following enclosures:

- Data Request Response Table providing the additional information requested in the Power the South Bay Project Data Request 1, received June 13, 2024.
  - Attachment A – Preliminary Design Drawings for Project Features
  - Attachment B – Revised PEA Figure 5.4-9
  - Attachment C – VMT Assumptions and Calculations
  - Attachment D – Copies of Correspondence with Native American Tribes (CONFIDENTIAL)
  - Attachment E – Updated PEA Table 5.18-2
  - Attachment F – Archaeologist Contact Information (CONFIDENTIAL)
  - Attachment G – GIS Shapefiles

Please contact me at (925) 808-0291 or djoseph@lspower.com with any questions regarding this information.

Sincerely,

Dustin Joseph

Dustin Joseph
Director of Environmental Permitting

Enclosures

cc: Lucy Marton (LS Power)
Casey Carroll (LS Power)
Jacob Diermann (LS Power)
David Wilson (LS Power)
Josh Taylor (KPE)
Michelle Wilson (CPUC)
Dave Davis (ESA)
Michael Manka (ESA)

LS Power - Power the South Bay Project (A. 24-04-017) CPCN and PEA Data Request 1

RESPONSE OVERVIEW

Review of the Certificate of Public Convenience and Necessity (CPCN) Application and Proponent's Environmental Assessment (PEA) for the Power the South Bay Project (Application 24-05-014) was based on the California Public Utilities Commission's (CPUC) Guidelines for Energy Project Applications Requiring California Environmental Quality Act (CEQA) Compliance: Pre-filing and Proponent's Environmental Assessments (November 2019). Based on these criteria, the Energy Division found that the PEA contains sufficient information to satisfy the requirements of the Commission's Information and Criteria List, and therefore deemed Application 24-05-014 complete. The following additional information is provided in response to the Power the South Bay Project Data Request No. 1, which identified further details and evaluation that is needed to adequately conduct the California Environmental Quality Act review.

LS Power – Power the South Bay Project (A. 24-05-014) Data Request No. 1, Response No. 1		
PEA Section	**DATA REQUEST**	**LS POWER RESPONSE[1]**
3.0 – Project Description		
3.3.1	Please provide preliminary design drawings for project features. • Figures 3-8 to 3-15 provide good information. The CPUC requests additional profile drawings for the substations and terminals which should show the expected facility including the security walls, poles, A-frames, etc. with dimensions showing the height. Provide drawings, including overhead and profile views, showing the excavation dimensions for typical splice vault and duct banks.	Available Preliminary Design Drawings for the duct bank excavation dimensions have been included as **Attachment A** to this Data Request (DR) Response No. 1. The information provided for the other project components in Figures 3-8 to 3-15 show the available information based upon the current stage of design and engineering. PG&E's Scope of Work will include the following: Substation components within substation perimeter: - Height of new structures will range up to approximately 65 feet above grade. The height of existing structures range up to 65 feet above grade. - The existing 12-foot-high substation security wall will not be modified. - 1-bay of existing 230kV lattice structure will be demolished for new line connection. Transmission components outside substation perimeter, within PG&E property: - Height of new structures will range up to approximately 150 feet above grade. - Height of existing structures are up to 160 feet above grade.

[1] Where edits were made to text from the PEA, added text is shown in underline and removed text is shown in ~~strikethrough~~.

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		Distribution components outside substation perimeter, within PG&E property: - Removal or relocation to be determined during detailed design. For security reasons, PG&E prefers not to identify specific equipment or provide detailed information on location of substation facilities. General information is not yet available on the design layout. LS Power is currently reviewing information provided by Silicon Valley Power (SVP) in response to this data request. LS Power will submit the information to CPUC under separate cover following completion of review.
3.3.4	Provide diagrams with dimensions of existing facilities. • See Section 3.3.1 above.	See DR Response No. 1 above. LS Power is currently reviewing information provided by SVP in response to this data request. LS Power will submit the information to CPUC under separate cover following completion of review.
3.5.5.2	Provide a diagram of the general sequencing and equipment that would be used. • This will be used as a figure in the Project Description.	See DR Response No. 1 and **Attachment A**.
3.5.6.1	Describe the process for testing excavated soil or groundwater for the presence of pre-existing environmental contaminants that could be exposed from trenching operations. • The PEA Project Description and Section 5.9, Hazards, Hazardous Materials, and Public Safety, were reviewed for this information; no such description was found.	As discussed in PEA **Section 3.5.6.2**, in the event that soils or groundwater suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during trenching operations, the excavated soils or groundwater would be tested, and, if contaminated above hazardous waste levels, the soils would be contained and disposed of at a licensed hazardous waste facility. All hazardous materials and hazardous wastes would be tested, handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. See PEA **Section 3.5.11** for more discussion on hazardous materials and management. As discussed in PEA **Section 5.10.4**, Groundwater encountered during underground construction would be pumped into water trucks for haul off or directly into containment tanks (e.g., Baker tanks) that allow acceptable de-sedimentation prior to discharge and testing for turbidity and pH, and other required parameters. When groundwater is encountered during construction, measures in **APM WQ-1** would be implemented to ensure

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		avoidance or minimization of potential impacts. Stormwater runoff would be managed according to the Stormwater Pollution Prevention Plan (SWPPP) to comply with any general construction permits and approved by the San Francisco Bay Regional Water Quality Control Board (RWQCB). Additionally, as discussed in **APM HAZ-2**, a Hazardous Materials Management Plan (HMMP) would be prepared that will set forth the protocols for the management, testing, reporting, and disposal of potentially contaminated soils or groundwater observed or discovered during construction. This would include termination of work within the area of suspected contamination and sampling by an OSHA-trained individual and testing at a certified laboratory.
3.5.6.2	Please provide the following information regarding trenchless construction techniques. • Describe the process for safe handling of drilling mud and bore lubricants.	Horizontal direction drilling (HDD) drilling mud/lubricant contains a combination of water and bentonite slurry (naturally occurring clay), that is considered non-hazardous. The mud is prepared in a tank and pumped through the drill pipe to the cutters. The mud acts as a coolant/lubricant during the drilling, while removing the cuttings and stabilizing the bore hole. Cuttings are returned to the entry pit (to later be disposed at an approved facility) while the mud is cleaned and recycled. When not in use, drilling mud would be stored in watertight containers. Official drilling mud and bore lubricant control, monitoring, and containment measures would be established prior to trenchless construction activities commencing and remain in place until after trenchless construction activities are completed, these measures will include but are not limited to: • All sediment and erosion control measures will be installed, including but not limited to, storm drain protection and wattles/silt fences. • The site will be evaluated for areas that are prone to inadvertent release of fluids (typically dry/cracked soils), and proper equipment/materials will be on site to deal with these issues. • Containment areas will be set up for equipment, drilling mud/lubricants, and cuttings storage. Containment areas typically consist of a pit formed by plastic sheathing and straw wattles.

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		• HDD equipment containing drilling mud would be set up in the sending and receiving pits to contain any potential spills. • As discussed in **APM HAZ-1**, a site-specific Spill Prevention, Control, and Countermeasure Plan (SPCCP) shall be prepared prior to the initiation of storage of hazardous liquids on the Proposed Project site in excess of the appropriate regulatory thresholds. In addition to the above measures that will be established prior to HDD operations commencing, the following measures would be taken during HDD operations: • An emergency spill kit and fracturing-out kit would be on hand for immediate spill response. • Equipment within 100 feet of any drainage or water resource would be placed in a double containment area. • Monitoring of fluid pressure, bore paths, and water bodies will continue through the HDD operation by a qualified person. • A vacuum truck with sufficient hoses will be staged on site prior to and during drilling operations for emergency response. A pump will be available to assist the vacuum truck. • Spoils would be stored at least 25 feet from any body of water and contained by a sediment barrier and plastic sheeting where practical, and drilling fluid would be stored in watertight containers when not in use. • In the event of an accidental spill, the Proposed Project shall be equipped with secondary containment that meets SPCCP Guidelines.
3.5.6.2	• Describe the process for avoiding contact between drilling mud/lubricants and stream beds.	As discussed in PEA **Section 3.5.6.2**, Geotechnical and topographical survey data would be used to design an HDD path that is adequately beneath the stream bed to minimize the likelihood of fracturing-out. During construction, drilling conditions would be inspected during drilling activities to ensure adequate conditions. Additionally, drilling fluid return volume would be continuously monitored. HDD equipment containing drilling mud would be operated from the sending and receiving pits to contain any potential spills. Spoils would be stored at least 25 feet

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		from any body of water and contained by a sediment barrier and plastic sheeting where practical, and drilling fluid would be stored in watertight containers when not in use. Erosion and turbidity control measures would be implemented in accordance with permit requirements. Methods may include, but are not limited to, the immediate placement of turbidity containment devices such as turbidity screen, silt containment fence, hay bales, and/or earthen berms to contain the drilling mud. All HDD operations will be monitored by a qualified monitor who would continually monitor drilling mud pressures and returns. The monitor would immediately shut down drilling operations during any loss of fluid over 2%. The monitor would also visually inspect the bore path at the completion of each joint and also 100 feet up and downstream along the bore alignment. In the event of an inadvertent release of drilling fluids, all construction activities contributing to the release would be ceased immediately and all applicable regulatory authorities will be notified of the release. Cleanup of the release would be coordinated with the applicable agencies and done in accordance with their guidance and work would not resume in the vicinity of the inadvertent release until approval from the applicable agencies is received. Once the HDD is complete, the monitor would continue to monitor for frac-outs for 48 hours after the drilling is complete.
3.5.6.2	• If engineered fill would be used as backfill, indicate the type of engineered backfill and the amount that would be typically used (e.g., the top two feet would be filled with thermal-select backfill).	The trenchless crossings would be filled from end to end with a low strength fluidized backfill (e.g., thermal grout or bentonite slurry) to ensure consistent thermal contact between the conduits and the earth to promote heat dissipation. When located within roads, the sending and receiving pits would be backfilled with a fluidized backfill following the trenchless construction and duct bank tie-in. A road base backfill, flowable backfill, or slurry concrete cap would be installed, and the road surface would be restored in compliance with local requirements. In non-roadway areas, a fluidized backfill would typically be used following the trenchless construction and duct bank tie-in. The flowable backfill would typically be stopped approximately one foot from the top of finish grade and native soils would be used for the remainder of the backfill.
3.5.6.2	• Describe the process for testing excavated soil or groundwater for the presence of pre-existing environmental contaminants. Describe the process of	As discussed in PEA **Section 3.5.6.2**, in the event that soils or groundwater suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during trenching operations, the excavated soils or groundwater would be tested, and, if contaminated above

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	disposing of any pre-existing hazardous waste that is encountered during excavation.	hazardous waste levels, the soils would be contained and disposed of at a licensed hazardous waste facility. All hazardous materials and hazardous wastes would be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. See PEA **Section 3.5.11** for more discussion on hazardous materials and management. As discussed in PEA **Section 5.10.4**, groundwater encountered during underground construction would be pumped into water trucks for haul off or directly into containment tanks (e.g., Baker tanks) that allow acceptable de-sedimentation prior to discharge and testing for turbidity and pH, and other required parameters. When groundwater is encountered during construction, measures in **APM WQ-1** would be implemented to ensure avoidance or minimization of potential impacts. Stormwater runoff would be managed according to the Stormwater Pollution Prevention Plan (SWPPP) to comply with any general construction permits and approved by the local RWQCB. Additionally, as discussed in **APM HAZ-2**, a Hazardous Materials Management Plan (HMMP) would be prepared that will set forth the protocols for the management, testing, reporting, and disposal of potentially contaminated soils or groundwater observed or discovered during construction. This would include termination of work within the area of suspected contamination sampling by an OSHA-trained individual and testing at a certified laboratory.
3.5.7.2	Describe the process and equipment required to construct any slope stabilization, drainage, retention basins, and spill containment required for the facility. • This information is necessary to consider the impacts of all project components, including those that provide mitigation.	As discussed in PEA **Section 3.5.4.5**, temporary work areas, terminal sites, and substation upgrade areas, including drainage and detention basins and access roads, would be stabilized during construction with BMPs that would be outlined in the Proposed Project's SWPPP, as discussed in more detail in PEA **Section 5.10**, *Hydrology and Water Quality*. The SWPPP BMPs would remain in place and would be maintained until new vegetation is established or sites are otherwise stabilized. As discussed in PEA **Section 3.5.4.6**, Construction of the Proposed Project and associated improvements would require earthmoving activities at the two terminal sites. However, the proposed HVDC terminal sites were chosen with avoidance of major site grading in mind. While earthmoving activities would be required for the proposed terminal sites and underground transmission lines, this is unlikely to be considered a substantial grading activity. Additionally,

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		during earthwork, soils and other surficial deposits that do not possess sufficient strength and stability to support structures would be removed from the work area. Removal would typically extend to competent materials with high mechanical strength and resistant to erosion and deformation. Material that requires processing would be mechanically processed on-site for placement as fill. Additionally, PEA **Appendix 3-A** outlines the construction equipment by work activity which includes site preparation, below grade construction, and above grade construction which includes the required equipment for slope stabilization, drainage, retention basins, and spill containment.
3.5.15.1	Describe fire prevention and response procedures that would be implemented during construction. • While the analysis of wildfire in Section 5.20 turns on whether a project is located in a State Responsibility Area and/or a Very High Fire Hazard Safety Zone, the analysis of wildfire risk in Section 5.9 does not.	As stated in PEA **Section 3.0** and described further in **Section 5.20**, the Proposed Project is located within a low fire threat area, as identified by California Department of Forestry and Fire Protection ("CAL FIRE") or the CPUC. Impacts are not anticipated to occur, and no mitigation would be required. Construction activities that result in elevated fire risk would implement additional fire prevention measures, as described below and within the PEA. During construction activities that are considered "hot work" (e.g., welding, grinding, or any other activity that creates hot sparks), LS Power would implement a ten-foot buffer around that activity, and vegetation would be cleared to ensure sparks do not create a fire hazard. For activities that do not produce sparks but still have potential to produce a fire hazard, LS Power would implement a five-foot buffer to be cleared of vegetation. Under Section 35 of GO 95, the CPUC regulates all aspects of design, construction, and O&M of electrical power lines and fire safety hazards for utilities subject to their jurisdiction (CPUC, 2020). In addition, Fire Prevention Standards for Electric Utilities (California Code of Regulations [CCR] Title 14, sections 1250-1258) provide definitions, maps, specifications, and clearance standards for projects under the jurisdiction of California Public Resources Code (PRC) sections 4292 and 4293 in State Responsibility Areas (SRAs). LS Power would design and construct the Proposed Project in accordance with all applicable state and federal regulations. In addition, PG&E would implement construction field protocol (FP) **FP-09**, which states:

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		During fire season in designated State Responsibility Areas, equip all motorized equipment with federally approved or state-approved spark arrestors. Use a backpack pump filled with water and a shovel and fire-resistant mats and/or windscreens when welding. During fire "red flag" conditions as determined by Cal Fire, curtail welding. Each fuel truck will carry a large fire extinguisher with a minimum rating of 40 B:C. Clear parking and storage areas of all flammable materials.
5.3 – Air Quality		
5.3.4.1 & 5.3.4.4	The filed PEA qualitatively evaluates staging areas and worker receptors, but two items for health risk remain outstanding. Please update the Health Risk Assessment (HRA) to include: • Annual average PM2.5 concentration (including fugitive dust); and	PM2.5 modeling is in progress and will be submitted under separate cover.
5.3.4.1 & 5.3.4.4	• Cumulative HRA utilizing Bay Area Air Quality Management District (BAAQMD) tools (the filed PEA qualitatively discusses other construction projects that could be nearby, but not existing sources in the BAAQMD tools such as stationary or mobile).	Cumulative HRA is in progress and will be submitted under separate cover.
5.3.4.2	Appendix 5.3-A is provided, but it only includes model output with no Excel spreadsheets. Please provide Excel spreadsheets as they will be required to adequately estimate average daily emissions. • For context, Section 5.3.4.3, Appendix 5.3-A indicates that average daily emissions are underestimated. As an example, 2026 emissions are based on total emissions for the calendar year, divided by 365 days; however, construction in 2026 starts in June, and would occur six days a week, so the actual average daily emissions could	Emissions modeling in PEA **Appendix 5.3-A** are based on the equipment spreadsheets included as PEA **Appendix 3-A**.

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	be close to twice as much as reported. The BAAQMD recommends that average daily emissions be estimated based on the number of construction days for the year, not the total days in the year.	
5.4 – Biological Resources		
5.4.1.4	Wetland Delineation Report. Aquatic resources are generally mapped in Figure 5.4-3 for the entire project from National Wetland Inventory (NWI) GIS files and in Figure 5.4-4, but only two short sections have been formally delineated. Please provide the wetland delineation report for formally delineated areas at Cushing Parkway. If access to certain areas of the Project alignment remains limited, please advise and provide this information as access is granted.	The formally delineated wetland areas are shown on pages 2 and 5 on **Figure 5.4-4** of the PEA. The wetland delineation data is presented within PEA **Appendix 5.4-A**. **Section 2.3.1** of **Appendix 5.4-A** (*Biological Resources Technical Report*) outlines the methodology for jurisdictional waters mapping surveys. **Section 4.7** of **Appendix 5.4-A** discusses the delineated aquatic resource features and **Figure 10** depicts the locations of these features. All Proposed Project Areas were surveyed for water features and potential jurisdictional wetlands. Where potential jurisdictional waters or wetlands occurred within Proposed Project impact areas (i.e., temporary construction areas or permanent Project features), formal wetland delineations were conducted, where access was granted. Additional information pertaining to preliminary and formal delineations are provided below. Two areas within the project study area that have the potential to consist of jurisdictional features were not formally delineated. The potential wetland identified west of structure AC-4 (refer to page 9 of **Figure 5.4-4**) is within Caltrans jurisdiction and access to this site has not yet been granted. Potential vernal pools were identified near the Newark to Albrae 230 kV and Newark substation as shown as yellow polygons on page 1 of **Figure 5.4-4**. However, these potential vernal pools were not formally delineated LS Power. These potential vernal pools are within PG&E work areas, located on PG&E-owned property, and are associated with Project components that would be owned and operated by PG&E. PG&E would implement construction BMPs to avoid or reduce impacts associated with vernal pools. As discussed above and in **Appendix 5.4-A**, a full formal wetland delineation and mapping was conducted for the potentially jurisdictional water features or wetlands that had the potential to be directly impacted by the Proposed Project. This included two areas that had been granted access permission at the time of the surveys: the area along Coyote Creek in the vicinity of McCarthy Boulevard and the San José-Santa Clara Regional Wastewater Facility (RWF) (i.e.,

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		from the southern side of McCarthy Boulevard bridge to the proposed overhead Structure DC-3), and both north and south sides of Cushing Parkway bridge, within the Cushing Parkway operation and maintenance easement. The wetland surveys were conducted on December 12, 2023 for the Coyote Creek area and March 15, 2024 for the Cushing Parkway bridge area. The two jurisdictional water features that were formally delineated are further described below. <u>Coyote Creek near McCarthy Boulevard</u> Coyote Creek is a perennial stream that flows north through the Survey Area. The channel has been modified on both banks, having been graded and in some places hardened, to protect adjacent infrastructure with a paved access road on the west and a trail to the east. The creek appeared to be flowing higher than normal during surveys in December 2023 as riparian vegetation was partially submerged. High-water conditions slightly affected the ability to delineate the ordinary high water marks (OHWMs) of the creek and its adjacent wetlands. The east side of the creek has been modified more than the west side, creating a more abrupt transition from the channel to the floodplain, leading to the uplands. This allowed for the delineation of the OHWM on the east bank and the CDFW jurisdictional extent based on the limit of riparian vegetation. A cattail- and bull rush-dominated wetland (*Typha angustifolia*, OBL and *Schoenoplectus* spp., OBL) lines the bank, partially below the OHWM. The west bank of the creek has been modified as well, but the transition from the creek to the uplands is more gradual and the fringe wetlands more extensive. It was not possible to fully investigate the west-bank OHWM because of the high water; however, the western extent of wetlands and the CDFW-jurisdictional extent was delineated. The proportion of wetland that is submerged channel vegetation versus fringe wetlands was undetermined. Regardless, the area below the CDFW line encompasses both aquatic resource types (emergent wetland and open-water channel). <u>Cushing Parkway</u> Cushing Parkway crosses a wide marsh with a 3,400-foot bridge. The marsh supports numerous shallow open-water ponds surrounded by marshlands; no main channel (i.e., river or creek) is present. Flow is generally to the southeast, eventually reaching the salt flats north of Coyote Creek. The ground level has been raised several feet and levelled, effectively creating a 30-foot

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		shoulder adjacent to both sides of the bridge. Barbed wire fence separates the shoulders from the adjacent marsh. Eight corrugated metal pipe culverts, ranging from 24- to 40-inch diameters, are distributed along the bridge to convey water beneath the bridge. A low water crossing allows for vehicle access midway across the bridge to the north side of the bridge and serves as a high-water conveyance. All culvert inlets are outside the fenced north shoulder and carry water under the shoulder and outlet under the bridge. Flows continue about 80 feet under the bridge in open concrete canals to another culvert inlet. The second culvert flows beneath the south shoulder and outlet beyond the fence to marsh beyond. Extending 800 feet from both ends of the bridge, the shoulders are steeper roadsides with some shrubs. The central section is nearly all short brome on flat ground built a few feet above the adjacent surface waters. Soils were moist, but not hydric, and no wetland hydrology was observed. The numerous culverts appear to adequately convey flow through the bridge. One wetland was located on the south side of the bridge about 900 feet from the western end. The wetland is 2,265 square feet (0.05 acre) within the Survey Area boundary (the fence) and the wetland extends beyond the fence connecting to a larger pond. Dominant vegetation was not identifiable (emerging grasses); however, hydrology and soils were strong which consisted of vegetation. It should be noted that the bridge is supported on numerous piles, and the ground directly beneath the bridge is exposed mud. The underside of the deck is low, less than 10 feet mostly, and no vegetation is present due to the shading.
5.4.1.8	Portions of the Don Edwards San Francisco Bay National Wildlife Refuge (NWR) near the project are only generically described – specifically, both sides of Cushing Parkway and to the north of Los Esteros Road, west of the San José-Santa Clara Regional Wastewater Facility (RWF). Please quantify and map the project areas within this biological resource management area. If access to certain areas of the Project alignment remains limited, please advise and provide this information as access is granted.	As discussed in PEA **Section 5.4**, *Biological Resources*, portions of the Proposed Project would be located adjacent to the Don Edwards San Francisco Bay NWR. The Don Edwards San Francisco Bay NWR Comprehensive Conservation Plan (CCP) does not provide regulations or take authorization for private development or utility infrastructure projects. **Figure 5.1-1** *Scenic Resources* shows the boundaries of the Don Edwards San Francisco Bay National Wildlife Refuge (NWR) relative to the Proposed Project. Additionally, Figure **5.11-3,** *BCDC Jurisdiction and Priority Use Areas* which is also included as **Figure 15** of the BRTR shows the boundaries of the Don Edwards San Francisco Bay NWR.

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		Based on field conditions and documentation received from the City of Fremont, LS Power understands that the Cushing Parkway bridge and associated O&M easement are not located within the Don Edwards NWR. As such, the Proposed Project is adjacent to, but does not fall within, the Don Edwards NWR. LS Power has reached out to the USFWS to introduce the Project and its vicinity to the Don Edwards NWR. The Proposed Project would only be located within the O&M ROW that is maintained by the City of Fremont along the Cushing Parkway bridge. This area is fenced in, maintained, mowed, and raised, separating it from the Don Edwards San Francisco Bay NWR to the north and south of the ROW. The portions of the Don Edwards San Francisco Bay NWR that are located on both sides of the Cushing Parkway bridge ROW includes a floodplain area that supports a combination of marsh and annual grassland habitats with numerous shallow open-water ponds. Additionally, a main channel (i.e., river or creek) is not present. Flow is generally to the southeast, eventually reaching the salt flats north of Coyote Creek. The Don Edwards San Francisco Bay NWR is used for cattle grazing on both sides of Cushing Parkway. Additionally, the Proposed Project crosses over the Don Edwards San Francisco Bay NWR jurisdiction along Coyote Creek under Fremont Boulevard. The Proposed Project's crossing of Coyote Creek would be an HDD crossing under the Creek and would not impact Coyote Creek or the Don Edwards San Francisco Bay NWR in this area. This portion of Coyote Creek includes riparian vegetation along the banks (cattails and bulrush). The Proposed Project is in close proximity to the Don Edwards San Francisco Bay NWR at Laguna Creek near Cushing Parkway just west of the Cushing Parkway and Fremont Blvd intersection. However, the Proposed Project is not within the NWR in this area. The area surrounding this portion of the Don Edwards San Francisco Bay NWR and Laguna Creek is very disturbed and developed. The creek includes some riparian vegetation along the banks (cattails and bulrush) but appears to be frequently disturbed or dredged. As shown in PEA **Figure 5.11-3**, the Proposed Project is within approximately 500 feet of the Don Edwards San Francisco Bay NWR along Los Esteros Road northwest of the Baylands Terminal site. This area includes brackish estuarine areas and salt marsh habitats and is in the vicinity of the Don Edwards San Francisco Bay NWR Environmental Education Center. Additionally, brackish estuarine areas and salt marshes are located to the north of Los Esteros

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		Road from the Baylands Terminal site to the merging of Los Esteros Road and Grand Boulevard. These areas appear to have been disturbed in the past and now are frequently inundated and support some riparian and salt marsh vegetation.
5.4.2.2	Please confirm if the proposed Project is covered by the Santa Clara Valley Habitat Plan.	The Proposed Project is located within the permit area for the Santa Clara Valley HCP, and the HCP covers public and private utility activities within the planning limits of urban growth (as defined by the HCP) including the activities associated with the Proposed Project. In addition, a majority of the Proposed Project occurs within the planning limits of urban growth and may be included as covered activities under this HCP. The Santa Clara Valley HCP provides incidental take coverage for project-specific impacts on Santa Clara Valley HCP-listed species and removes the need to obtain incidental take permits from the wildlife agencies and reduces the number and scope of required biological studies. The Santa Clara Valley HCP allows for Public or quasi-public entities to request coverage under the HCP for activities that are within the permit area through their Participating Special Entity Application Process. If it is determined that Santa Clara Valley HCP-listed species would be impacted by the Proposed Project, LS Power would consult with the appropriate HCP stakeholders to opt into and be covered by the HCP as a Participating Special Entity. However, if It is determined that the Proposed Project would not impact Santa Clara Valley HCP listed species, LS Power would not utilize the HCP.
5.4.4.3	Please quantify and map listed species habitat that will be impacted by the proposed Project. Vernal pool tadpole shrimp and California tiger salamander are known from habitats immediately adjacent to Cushing Parkway. If access to certain areas of the Project alignment remains limited, please advise and provide this information as access is granted.	As discussed in PEA **Section 5.4**, *Biological Resources*, there is USFWS-designated critical habitat for the Contra Costa goldfields, western snowy plover, and vernal pool tadpole shrimp located within the Don Edwards San Francisco Bay NWR in the northern portion of the Survey Area and extending into the Proposed Project impact area along Cushing Parkway (USFWS, 2023; **Figure 5.4-6**, *Critical Habitat Map*). There is also NMFS-designated critical habitat for the Central California Coast distinct population segment (DPS) of steelhead and for the Southern DPS of green sturgeon. The critical habitat for steelhead occurs along Coyote Creek and the Guadalupe River within the Proposed Project area. The critical habitat for the green sturgeon occurs within the Proposed Project area along Coyote Creek, San Tomas Aquino Creek, Guadalupe River, near Coyote Creek Lagoon in a drainage that passes under Fremont Boulevard, and along a tributary to Coyote Creek that passes under Cushing Parkway just east

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		of the Fremont Boulevard and Cushing Parkway intersection. Additionally, some critical habitat for green sturgeon occurs within estuary areas associated with the San Francisco Bay (NMFS, 2024; **Figure 5.4-6**). Additionally, **Figure 5.4-9** indicates potentially impacted species habitat. **Figure 5.4-9** has been revised and included as **Attachment B** to this data request response to clearly indicate the locations of the listed species habitat. Impacted species habitat is quantified by species on pages 5.4-31 through 5.4-42 and lists applicable APMs. As discussed on page 5.4-34, there would be up to 0.31 acre of temporary impacts and no permanent impacts to suitable nesting or foraging habitat for the California Ridgway's Rail and California Black Rail. As discussed on page 5.4-35, the Proposed Project would result in up to approximately 82.51 acres of temporary impacts to potentially suitable nesting and foraging habitat and permanent loss of up to approximately 8.65 acres of potentially suitable nesting and foraging habitat (native and nonnative grassland habitat) for burrowing owl. As discussed on page 5.4-36, the Proposed Project would result in up to approximately 82.51 acres of temporary impacts to foraging habitat and a permanent loss of approximately 8.65 acres of foraging habitat (native and nonnative grassland habitat) for golden eagle and other raptors. The Proposed Project would result in up to approximately 7.01 acres of temporary impact to potentially suitable nesting and foraging habitat and permanent loss of approximately 0.02 acre of potentially suitable nesting and foraging habitat for the tri-colored blackbird. Direct impacts to the special-status invertebrate species (Monarch butterfly, large marble butterfly, Crotch's bumblebee, Western bumblebee [grassland and disturbed grassland habitat], vernal pool tadpole shrimp, and vernal pool fairy shrimp) could include potential vehicle strikes or crushing during construction and operation, removal of suitable flowering vegetation for butterflies and bees during construction and vegetation clearing activities, and permanent loss of approximately 8.63 acres of potentially suitable habitat (annual grassland) (**Figure 5.4-9**). Temporary impacts to special status invertebrate species could occur due to disturbance of approximately 88.53 acres of annual grassland, riparian, and wetland habitat types. As discussed on page 5.4-41, direct impacts to the special-status amphibian and reptile species, such as California red-legged frog (CRLF) (vicinity of Coyote Creek and associated lakes and ponds) (**Figure 5.4-9**), western pond turtle (WPT) (open water habitats exist along Coyote Creek, Agua Caliente Creek, Guadalupe River, and numerous ponds and lakes; brackish estuarine areas exist in the vicinity of Don Edwards

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		San Francisco Bay NWR and the San Francisco Bay) (**Figure 5.4-9**), and California tiger salamander (CTS) could include potential direct mortality due to vehicle strikes during Proposed Project construction and operation, removal of vegetation that could be used for breeding and cover during construction and vegetation clearing activities, and temporary loss of approximately 88.65 acres and permanent loss of approximately 8.66 acres of potentially suitable breeding and upland dispersal habitat (annual grassland, wastewater treatment ponds, riparian, and wetland habitat types; see **Table 5.4-4** for impacts to each habitat type).
5.4.4.4	A wetland identification table was not provided because the delineation is not complete. Construction methods are not discussed in detail. Please provide details on both. Please confirm if California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB),and/or U.S. Army Corps of Engineers (USACE) permitting is needed for the "no impact" horizontal directional drilling (HDD) crossings.	As discussed in PEA **Section 5.4**, *Biological Resources*, a full formal wetland delineation and mapping was conducted for the jurisdictional water features with the potential to be impacted by the Proposed Project at two locations where access was granted: the area along Coyote Creek in the vicinity of McCarthy Boulevard and the San José-Santa Clara RWF (i.e., from the southern side of McCarthy Boulevard bridge to the proposed overhead structure DC-3), and both north and south sides of Cushing Parkway bridge. The impacts to CDFW and RWQCB/USACE for work areas associated with proposed overhead transmission line structures DC-1 and DC-2 are shown in **Table 5.4-6.** Construction of DC-1 and DC-2 would potentially impact a delineated wetland as shown on page 5 of **Figure 5.4-4**. Typical methods that would be used for construction of overhead transmission line structures DC-1 and DC-2 are outlined in **Section 3.5**, *Construction.* **Section 3.5.6.2** outlines the HDD construction techniques. Additionally, **APM BIO-1** outlines restoration steps to restore temporary disturbance to natural vegetation areas inclusive of annual grassland, annual grassland/wetland, riparian, wetland, and vernal pools. **APM BIO-4** outlines how to clearly mark sensitive biological areas prior to construction. **APM BIO-17** outlines construction timing restrictions in the vicinity of waterways, wetlands, and vernal pools. Jurisdictional waters permits are not required for HDD borings that do not result in impacts to the jurisdictional feature. The proposed HDD boring pits would be placed outside of CDFW, RWQCB and/or USACE jurisdictional areas. One would be located on either side of the jurisdictional area that would utilize the borings. In general, HDD borings are drilled at an angle to a depth that is sufficient to cross under the jurisdictional feature without impacting the feature. At the determined depth, the bore flattens out horizontally, traveling underneath the jurisdictional area, then returns gradually to the surface at the second bore pit. HDD boings do not result in

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		impacts to the jurisdictional feature at the surface, and no permits (LSAA, WDR, or USACE) are required.
5.17 – Transportation		
5.17.4.2	Please provide an Excel spreadsheet with vehicle miles traveled (VMT) assumptions and model calculations.	An Excel spreadsheet with VMT assumptions and calculations is provided as **Attachment C.**
5.17.4.3	Please provide a traffic impact study or explain why such a study is not necessary.	The CPUC *Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments* require that, if necessary, a traffic impact study should be prepared in accordance with guidance from the relevant local jurisdiction or Caltrans, where appropriate. As described in PEA **Section 5.17.2.1**, *Transportation Regulatory Setting*, the City of Fremont Transportation Impact Analysis (TIA) Handbook, City of Milpitas Transportation Analysis (TA) Guidelines, and City of San José TA Handbook provide guidelines for significance criteria, screening criteria, and thresholds of significance for environmental clearance for development projects. The Santa Clara Valley Transportation Authority (VTA) TIA Guidelines (October 2014) also provide a trip threshold for when a TIA must be completed. Each of the relevant local guidelines do not address or account for transmission lines or regional public utility infrastructure, and the screening criteria focus on operational impacts of specific local-serving land use projects, such as residential infill, office and industrial, or roadway expansions and improvements. The Santa Clara VTA trip threshold, for example, states that a TIA must be prepared when a project is expected to generate 100 or more net new weekday (AM or PM peak hour) or weekend peak hour trips, including both inbound and outbound trips. Trip-reduction measures in each of the plans are specific to operational trips following project construction, which do not apply to the Proposed Project. The Proposed Project would result in a negligible number of additional vehicle trips during operation because the new facilities would be unstaffed and remotely monitored. If equipment malfunctions, O&M personnel would be dispatched to the site to investigate the problem and take appropriate corrective action. Therefore, the Proposed Project would not meet the relevant local thresholds for preparing a TIA or TA for operational impacts. Construction trips and VMT

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		would be short-term and temporary in nature and would represent a small percentage of existing VMT and average annual daily traffic (AADT) on regional roadways that could serve as Proposed Project access routes. As stated in PEA **Section 5.17.4.1**, *Transportation Impact Analysis,* the maximum daily vehicle trips during construction of the Proposed Project (500 per day) would represent approximately 0.26 percent of the AADT at the junction of I-880 and SR-262 and 0.32 percent of the AADT at the junction of I-880 and SR-237. **Table 5.17-1**, *Existing Roadways Summary*, provides the existing daily traffic volume for local roadways that would provide vehicle access to the Project site. Proposed Project vehicles would be travelling along a variety of routes depending on their purpose and destination (e.g., deliveries, spoils haul-off, tailboard meetings, traffic control, etc.) during various construction phases and would, therefore, be expected to account for a much smaller percentage of AADT and daily traffic volume at each of these junctions and local roadways. The Proposed Project does not meet any established thresholds of the City of Fremont TIA Handbook, City of Milpitas TA Guidelines, City of San José TA Handbook, or Santa Clara VTA TIA Guidelines to prepare a CEQA VMT analysis, a Transportation Demand Management (TDM) Plan, TIA, or a Local TA for long-term operations due to the negligible trips and VMT required for O&M of the Proposed Project. Therefore, the Cities of Fremont, Milpitas, and San José and Santa Clara VTA guidelines related to preparation of a TIA, TOA, or TA for operational impacts are not applicable to the Proposed Project. Further, **Section 5.17** of the PEA provides a consistency analysis with existing transportation-related plans, and concludes that construction and O&M of the Proposed Project would not conflict with the Alameda Countywide Transportation Plan; Alameda Countywide Transit Plan; City of Fremont General Plan; City of Fremont Bicycle Master Plan; Santa Clara VTP 2040; Santa Clara Countywide Bicycle Plan; City of Milpitas General Plan; City of Milpitas Trail, Pedestrian, and Bicycle Master Plan; City of San José General Plan; City of San José Better Bike Plan; City of San José Vision Zero campaign; City of Santa Clara General Plan; or the City of Santa Clara Bicycle Plan. Proposed Project-generated traffic would be temporary, periodic, and managed with the implementation of a Traffic Control Plan (**APM TRA-1**), which would further reduce impacts to traffic congestion. Therefore, preparation of a traffic study in accordance with local relevant guidelines is not necessary for the Proposed Project.

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5.18 – Tribal Cultural Resources		
5.18.1.1	Please provide copies of all correspondence between PanGIS/LS Power and tribes.	Copies of all correspondence between PanGIS/LS Power and tribes have been included as **Attachment D** (CONFIDENTIAL).
5.18.1.2	Two isolates were observed in the proposed Project area during surveys. Please provide an evaluation of these two isolates.	As discussed in PEA **Section 5.18**, *Tribal Cultural Resources*, Resource CP-Iso-01 is a potential groundstone artifact with unifacial wear, and resource SA10-Iso-02 is a small green chert core with evidence of flake removal; both are isolated finds in disturbed context. **Table 5.18-2** has been updated as **Attachment E** to this data request response to indicate that the two resources are not eligible for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR). As discussed in PEA **Section 5.5**, *Cultural Resources*, two new prehistoric archaeological resources were located during the surface survey, as shown in **Table 5.5-3**, *Archaeological Survey Results*. Resource CP-Iso-01 is a potential groundstone artifact with unifacial wear, and resource SA-10-Iso-02 is a small green chert core with evidence of flake removal; both are isolated finds in a disturbed context and, therefore, do not qualify as historical resources as defined in Section 15064.5. No additional archaeological resources or TCRs, as defined in Section 15064.5, were located during the surface survey. Detailed survey methods and results are described in the *Cultural Resource Technical Report for the Power the South Bay Project, Santa Clara County, California* (Mengers et al., 2024), which is included as PEA **Appendix 5.5-A**.
GIS Data Review		
GIS	Please provide GIS shapefiles for the California Historical Resources Information System (CHRIS) record search and cultural survey results/newly recorded resources, per the confidential Appendix F of the cultural resources report (Figure 6, “Previously Recorded Resources” and Figure 7, “Survey Results”).	Due to the confidentiality of the CHRIS record search GIS data, the CPUC’s archaeologist can coordinate directly with the Project archaeologist to obtain the requested data. Project Archaeologist contact information is provided as **Attachment F** (CONFIDENTIAL).

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GIS	Please provide GIS shapefiles for access road type (e.g., overland vs. dirt vs. existing access).	GIS shapefiles with access road types have been included as **Attachment G** to this Data Request Response. Existing access roads for the Proposed Project are discussed in PEA **Section 3.5.1.1** and **Table 3-2** of **Section 3.0**, *Project Description*. Existing access roads for the Proposed Project provide access to the overhead portion of the Albrae to Baylands 320 kV DC transmission line and are shown on pages 5 through 7 of **Figure 3-4**. As shown in **Figure 3-4**, the existing access road begins at the southern boundary of Staging Area 4, off McCarthy Boulevard, at the location of overhead structure DC-1 and ends at Zanker Road. As discussed on page 3-23, the existing and primary access to the proposed Albrae terminal site for both construction and O&M would be from Weber Road. The existing and primary access to the proposed Baylands terminal site for both construction and O&M would be from Los Esteros Road. The Proposed Project includes underground transmission lines that are sited almost exclusively within existing public roads. Therefore, the roads where the Proposed Project is located and adjoining roads would be utilized for construction and operations access. Additionally, **Section 3.5.1.2** of the PEA discusses new access roads and **Table 3-3** provides additional details on the new access roads.
GIS	Please provide GIS shapefiles for new or modified rights-of-way or easements.	The Proposed Project would utilize a combination of existing property, existing ROW/easement, franchise rights within existing public roadways, and new ROW. GIS data (.shp files) for the areas where new ROW is required has been included as **Attachment G** to this Data Request Response. Additionally, PEA **Section 3.4.3** discusses ROWs and easements. Specifically, the proposed HVDC terminals would be sited on land owned or leased by LS Power and would not require a new or modified ROW or easement. As discussed on page 3-21 of **Section 3.0**, the proposed Newark to Albrae 230 kV transmission line, Albrae to Baylands 320 kV DC transmission line, and Baylands to NRS 230 kV transmission lines, duct banks, and splice boxes would require new ROWs/easements or franchise agreements. The overhead portion of the proposed Baylands to NRS 230 kV transmission line would require a ROW width of 110 feet, and the ROW width for the underground transmission is generally approximately 10 feet. As discussed on page 3-22 of **Section 3.0**, the ROW for all underground portions of the proposed Newark to

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		Albrae 230 kV transmission line, Albrae to Baylands 320 kV DC transmission line, and Baylands to NRS 230 kV transmission line would be expanded at vault locations. The specific width of necessary easements, ROWs, or franchise agreements along the Proposed Project transmission line alignments would be refined during the final engineering process. A portion of the new permanent easement/ROWs would be acquired by LS Power through negotiations with private landowners, SVP, PG&E, and municipal-, state-, and regional agency-owned lands discussed in above in **Section 3.4.1**. New permanent ROWs or licenses would also be acquired from each applicable public agency through that agency's designated process. As discussed in **Section 3.4.3.2** and **3.4.3.3**, PG&E owns the parcel the existing Newark substation is located on, and no additional ROWs or easements would be required. The City of Santa Clara owns the parcel the existing NRS substation is located on, and no additional ROWs or easements would be required.