



August 25, 2025

VIA EMAIL

Tharon Wright, CPUC
Power Santa Clara Valley Project
c/o Environmental Science Associates; Att. V. Nez
575 Market Street, Suite 3700
San Francisco, CA 94105
PowerSCV@esassoc.com

RE: LS Power Grid California, LLC Comments on the Draft Environmental Impact Report for the Power Santa Clara County Project (Application 24-04-017); State Clearinghouse No. 2024090200

Dear Ms. Wright:

LS Power Grid California (LSPGC) has reviewed the Draft Environmental Impact Report (Draft EIR) dated July 10, 2025, for the Power Santa Clara Valley Project (Project). LSPGC appreciates this opportunity to comment on the Draft EIR, pursuant to the California Environmental Quality Act Guidelines. Please see **Attachment A**, LSPGC Draft EIR Comment Table and **Attachment B**, Editorial Suggestions Table for the Power the South Bay Project Draft EIR.

Should you have any questions or need any additional information, please do not hesitate to contact me at (925) 808-0291.

Sincerely,

A handwritten signature in black ink that reads "Dustin Joseph".

Dustin Joseph
Director of Environmental Permitting

Enclosures

cc: Casey Carroll (LSPGC)
Jacob Diermann (LSPGC)
Lucy Marton (LSPGC)
David Wilson (LSPGC)
Silvia Yanex (ESA)
Valisa Nez (ESA)

Comment Number	DEIR Page #	DEIR Section, Paragraph, Figure # or Table #	Original DEIR Text	LSPGC Comments and Proposed Revisions
General				
1	Global Comment	Not Applicable (N/A)	N/A	LSPGC (LS Power Grid California, LLC) has completed additional diligence on the identified Environmentally Superior Alternative, Grove High-Voltage Direct Current (HVDC) Terminal Alternative 3, and is prepared and expects to be able to implement this alternative if the Commission selects the Grove Terminal Alternative 3 site over the Proposed Project’s Grove Terminal site.
2	Global Comment	N/A	e.g., “...the County eliminated the potential alternatives listed below...”	Search entire document for instances where the DEIR intended to say “CPUC” (California Public Utilities Commission) but said “County” instead. Make corrections as needed.
3	Global Comment	Various Figures (e.g., Figures 2-3d, 3.1-2, etc.)	N/A	Please fix the errors on all figures where a green triangle is included to represent “Existing Distribution Pole – to be removed.” While there are four existing distribution poles located on the proposed Grove HVDC Terminal site, only three of these poles would be removed. The westerly most distribution pole on the proposed Grove HVDC Terminal site is not planned to be removed.
4	Global Comment	Chapter 2, Chapter 3	e.g., “LSPGC plans to leave 150 trees along the Monterey Road frontage at the proposed Grove HVDC Terminal site.” e.g., “...the top of the underground duct bank would be a minimum of 3 feet beneath the surface, with depths ranging from 3 to 10 feet.” e.g., “Horizontal bore sending and receiving pits measure 15 feet by 50 feet .”	The DEIR does not include qualifying language (e.g., "approximately," "typically," "are anticipated to", etc.) in the Project Description. LSPGC recommends restoring appropriate qualifying language throughout the Project Description, consistent with LSPGC’s Proponent’s Environmental Assessment (PEA).
5	Global Comment	N/A	N/A	LSPGC has identified multiple inconsistencies between Tables ES-2, ES-3, and 4-11 and the individual Impact Assessment sections in Chapter 3, including discrepancies where impact conclusions differ between tables and detailed sections (e.g., "less than significant" versus "less than significant with mitigation"), incorrect parenthetical statements following impact descriptions throughout Chapter 3, and criteria concluded as "no impact" that are omitted from Table ES-2. LSPGC recommends that a comprehensive cross-reference review of all summary tables and corresponding impact analysis sections be performed to ensure consistency and accuracy throughout the Final EIR.
6	Global Comment	N/A	N/A	For consistency, LSPGC suggests that the DEIR reference the Appendix G language in the Impact Assessment headers as opposed to using the ultimate conclusion of the analysis.
7	Global Comment	Executive Summary, Chapter 3 and Chapter 4	“Determining an environmentally superior alternative can be difficult because of the many factors that must be balanced. Nonetheless, at this stage of this Draft EIR, the combination of the “Proposed Alignment + Grove Terminal Alternative 3” (i.e., Alternative Combination 1, or AC-1) has been determined to be preferred because, relative to the Project, would avoid or reduce potentially significant impacts of the Project on aesthetics, agricultural and forestry resources, air quality, biological resources, energy, geology, soils, and paleontological resources, greenhouse gas emissions, hazards and hazardous	LSPGC has identified multiple inconsistencies between Tables ES-2, ES-3, and 4-11 and the individual Impact Assessment sections in Chapter 3 and the alternatives in Chapter 4. In addition, the following resource areas listed in the text on page ES-29 do not have potentially significant impacts: energy, geology, soils, and paleontological resources, greenhouse gas emissions.

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			materials, hydrology and water quality, noise, recreation, transportation, utilities, and wildfire.” For example, the significantly shorter Metcalf to Grove 500 kV Transmission Line would no longer traverse 1.2 miles along Coyote Creek Trail and Coyote Creek, which, under the Project, would result in potentially significant impacts associated with biological resources, recreation, and transportation, among other resource areas.”	Furthermore, all impacts except cultural and tribal cultural resources are less than significant with implementation of mitigation measures.
Executive Summary				
8	ES-8 to ES-27	Table ES-3	N/A	LSPGC noted several differences between the mitigation measures in the Executive Summary and the detailed Environmental Analysis sections. Please ensure mitigation measures are consistent throughout the Final EIR.
9	ES-31	5 th bullet in Section ES.9	“Determine whether the significant and unavoidable impact related to cultural resources and tribal cultural resources outweighs the need for the Project and, if so, prepare a statement of overriding considerations.”	This sentence is constructed such that a statement of overriding considerations is prepared if the significant unavoidable impacts outweigh the need for the Project, which is incorrect. The text should be revised as follows: “Determine whether need for the Project outweighs the significant and unavoidable impact related to cultural resources and tribal cultural resources outweighs the need for the Project and, if so, prepare a statement of overriding considerations.”
1. Introduction				
10	1-5	4 th paragraph	“...no local discretionary (use permits) are required.”	The CPUC authority preempts all local discretionary approvals issued pursuant to local authority, not just “use” permits. Please delete “use” from the identified sentence.
11	1-5	4 th paragraph	“The CPUC’s General Order 131-D requires LSPGC to comply with local building, design, and safety requirements and standards, to the degree feasible, to minimize potential Project conflicts with local land uses.”	CPUC General Order (GO) 131-D states “...public utilities shall consult with local agencies regarding land use matters. In instances where the public utilities and local agencies are unable to resolve their differences, the Commission shall set a hearing no later than 30 days after the utility or local agency has notified the Commission of the inability to reach agreement on land use matters.” As such, LSPGC suggests the following language: “The CPUC’s General Order 131-D (GO 131-D) requires LSPGC to consult with local agencies on land use matters even though local jurisdictions are preempted from regulating the proposed project. In instances where the public utility and the local agency have unresolved differences regarding land use matters, GO 131-D provides a process by which the CPUC would resolve those differences. ”.
12	1-9	3 rd paragraph	“Eleven members of the public provided oral or written comments on the Project during the September 6, 2024, hybrid scoping meeting.”	Please revise as the scoping meeting was held on September 18, 2024.
13	1-9	5 th paragraph	“As of this scoping report, the following tribes have responded to the CPUC to express interest in the Project...”	LSPGC suggests rewriting this to capture the intent of the early tribal outreach process.
2. Project Description				
14	2-2	1 st paragraph	“...are not part of the work submitted for authorization in LSPGC’s application as PG&E and Silicon Valley Power (SVP) are not applicants.”	Please remove the reference to SVP as Project is not interconnecting to SVP.

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15	2-10	Figure 2-3a	N/A	Figure 2-3a should be revised to include the updated Pacific Gas and Electric Company (PG&E) San Jose B Substation Rebuild/Expansion Area.
16	2-16	Figure 2-4c	N/A	Please add a label to the dashed lines in the figure legend.
17	2-19	Figure 2-5	N/A	Remove black circle and label for Dead End Structure.
18	2-20	2 nd paragraph	“The Project proposes 500/320 kV transformers at the proposed Grove HVDC Terminal and 320/115 kV transformers at the proposed Skyline HVDC Terminal.”	The Skyline HVDC Terminal will have 320/230 kilovolt (kV) transformers, not 320/115 kV.
19	2-20	2 nd paragraph	“...and space would be reserved for future multi-terminal expansion.”	Please remove reference to “future multi-terminal expansion”, as the California Independent System Operator (CAISO) removed this requirement in the revised Transmission Plan.
20	2-22	Footnote 7	“Should any conflicts between the Project and existing transmission or distribution lines be discovered during final engineering of the transmission line alignments...	Revise to, “Should any conflicts between the Project and existing utility facilities transmission or distribution lines be discovered during final engineering of the transmission line alignments...”
21	2-23	2 nd paragraph	“The proposed Grove to Skyline 320kV Transmission Line would be encased in a 36-inch casing pipe proposed to have five smaller internal ducts: three...”	Revise to “... would be encased in a duct bank proposed to have five ducts a 36-inch casing pipe proposed to have five smaller internal ducts: three...”
22	2-23	Table 2-2 second column header	“Number of Duct Banks”	Revise to “Number of Internal Ducts Banks. ”
23	2-31	2.6.5.2	“The access road at the proposed Grove HVDC Terminal would approximately 300 feet to be 20 feet wide. At this location, Monterey Road has four lanes and is 80 feet wide, and is a public paved, divided road. For access to the proposed Grove HVDC Terminal from Monterey Road, the Project includes the installation of a paved access road apron where the new access road approaches Monterey Road as required.”	Revise to include upgrade of the existing access road at the proposed Grove Terminal site to support construction traffic from Monterey Road to the terminal facility’s perimeter wall as discussed in LSPGC’s PEA (page 3-14).
24	2-32	2.7.3	“New easements or ROW would range in width from 3 feet to 5 feet,”	LSPGC suggests revising to: “New easements or ROW would typically range in width from approximately 3 feet to 10 5 feet.”
25	2-40	First Paragraph	“...site availability during the construction window, which is years in the future, is uncertain at this stage.”	Construction is no longer years in the future. Recommend removing the word “years”.
26	2-54	4 th paragraph	“Should groundwater be encountered, dewatering may be required using a portable pump, and the water would be disposed of in accordance with applicable regulations and acquired permits. Groundwater encountered during underground construction would be pumped either into water trucks for haul-off or directly into containment tanks. Dewatering procedures are described further in Section 2.8.9, Water Use and Dewatering.”	Strike the following sentence as shown below: Should groundwater be encountered, dewatering may be required using a portable pump, and the water would be disposed of in accordance with applicable regulations and acquired permits. Groundwater encountered during underground construction would be pumped either into water trucks for haul-off or directly into containment tanks. Dewatering procedures are described further in Section 2.8.9, Water Use and Dewatering.
27	2-55	1 st paragraph	“All pit soils would be hauled off-site and a fluidized backfill would be used after the trenchless construction.”	LSPGC recommends deleting this. It is repetitive and it does not belong in this section since it refers to trenchless (Section 2.8.5.4).

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28	2-62	Last paragraph	“Public access restrictions would range from a few days or weeks for trenching operations to up to the full duration of construction (approximately 27 months).”	LSPGC suggests revising the parentheses to read “approximately 24 months” for consistency with the remainder of the EIR.
29	2-64	2.8.8.3 Runoff	2.8.8.3 Runoff	Please add the following text, as included in LSPGC response to CPUC Data Request No. 2: “Given the urban nature of the Skyline terminal site, LSPGC may also discharge stormwater from the Skyline terminal site into the City of San Jose’s existing stormwater system within Santa Theresa Street, adjacent to the Skyline terminal site.” The stormwater drainage and conveyance system may include a combination of surface drainage, swales, and/or underground piping to efficiently direct stormwater towards the stormwater detention system while minimizing erosion and standing water risks.
30	2-66	2.8.9.2 Dewatering	“Dewatering would be conducted using a pump or well points. Groundwater encountered during underground construction would be pumped either into water trucks for haul-off or directly into containment tanks (e.g., Baker tanks) that allow acceptable de-sedimentation before discharge and tested for turbidity, pH, and other required parameters. The groundwater would be discharged into the storm sewer system when the water meets quality standards in accordance with applicable regulations and acquired permits, or it would be hauled off for disposal if quality standards are not met...”	LSPGC suggests revising to: “Dewatering would be conducted using a pump or well points. Groundwater encountered during underground construction would be pumped either into water trucks for haul-off or directly into containment tanks (e.g., Baker tanks) that allow acceptable de-sedimentation before discharge and tested (e.g., turbidity, pH, and other required parameters) and the groundwater would be discharged into the storm sewer system when the water meets quality standards in accordance with applicable regulations and acquired permits, or it would be hauled off for disposal if quality standards are not met.”
31	2-91	1 st Paragraph	“Power lines, like electrical wiring and electrical equipment, produce EMFs at 60 Hz (OSHA 2025).”	The current statement refers generally to ‘power lines’ producing electric and magnetic fields (EMFs) at 60 Hz. However, alternating current (AC) and direct current (DC) lines differ in this respect. To be accurate, the text should state: “ <u>AC</u> power lines, like electrical wiring and equipment, produce electromagnetic fields (EMFs) at <u>a frequency of</u> 60 Hz (OSHA, 2025). <u>In contrast, DC power lines generate static electric and magnetic fields, reflecting the constant, unidirectional flow of current.</u> ”
3.0 Introduction to Environmental Analysis				
32	3-2	1 st paragraph	“For this Draft EIR, unless as otherwise noted, baseline conditions are those as they existed on or about September 18, 2024, the date the Notice of Preparation (NOP) for this Draft EIR was published.”	Please update the NOP publishing date to September 6, 2024.
3.1 Aesthetics				
33	3.1-41	Mitigation Measure 3.1-2	“The use of outdoor lighting shall be minimized during construction, operation, and maintenance. Photocell and motion detection-controlled lighting shall be provided at a level sufficient to provide safe entry and exit to the Project work sites and to ensure the security of the sites. All lighting shall be selectively placed, shielded, and directed to minimize fugitive light. Portable lights shall be operated at the lowest feasible wattage and height. The number of nighttime lights used shall be limited to those necessary to accomplish the task	Mitigation Measure (MM) 3.1-2 is essentially identical to Applicant-Proposed Measure (APM) BIO-7. LSPGC recommends deleting MM 3.1-2 since APM BIO-7 already addresses concerns regarding outdoor lighting and this would reduce confusion between the two measures. In addition, the use of photocell and motion detection-controlled lighting is not technically feasible during nighttime construction where continuous lighting is needed for safety. If MM 3.1-2 is retained, LSPGC requests the reference to photocell and motion detection-controlled lighting be removed.

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			completely and safely. All lighting near sensitive species habitat shall be directed away from these areas where feasible.”	
3.2 Agriculture and Forest Resources				
34	3.2-16	Impact 3.2-1	“The Project would convert Prime Farmland, which is defined as ‘farmland with the best combination of physical and chemical features able to sustain long term agricultural production’ (see Section 3.2.2.2, State). The proposed Grove HVDC Terminal would be located on a 13.6-acre property designated as Prime Farmland, which would be permanently converted to non-agricultural use. Specifically, approximately 3.3 acres of the site are located within the city of San José and zoned for Planned Development within an Agricultural Base District. The remaining 10.3 acres are located within unincorporated Santa Clara County. Collectively, this 13.6-acre property is currently used as an orchard, and this use would be terminated upon Project construction; however, 150 of the 3,000 existing trees would remain along Monterey Road.”	Development of the Grove Terminal site would result in a permanent conversion of 7.4 acres of the 13.6-acre parcel, of which 10.3 acres are designated as Prime Farmland. Please note that the remaining 6.2 acres of the parcel would still be available for future agricultural use. As such, compensatory mitigation should only apply the permanent conversion of Prime Farmland and not include any temporary impacts to agricultural uses.
35	3.2-17	Mitigation Measure 3.2-1	Mitigation Measure 3.2-1: Conservation and Restoration of Farmland	The text of MM 3.2-1 should be revised to clarify that this mitigation measure applies only to alternatives that impact Prime or Unique Farmland.
36	3.2-17	Mitigation Measure 3.2-1	“LSPGC shall provide a financial donation or purchase an agricultural conservation easement to protect and restore farmland in Santa Clara County, subject to review and approval of the Santa Clara County Agricultural Commissioner and Santa Clara County Open Space Authority. The ratio of mitigation shall be equivalent to 1:1 as compensation for Project Prime Farmland removed from agricultural productivity. The conservation mitigation shall be paid to the Santa Clara Valley Open Space Authority or other appropriate agricultural land trust operating in Santa Clara County for the purposes of reclaiming, restoring, and/or conserving Prime Farmland in Santa Clara County.”	As written, this measure does not provide ratepayers with sufficient cost protection and may effectively provide the Santa Clara County Agricultural Commissioner and the Santa Clara County Open Space Authority with veto power over the Project. As such, we recommend the following revisions to ensure that CPUC maintains an appropriate level of oversight over the Project: “...subject to review and approval of CPUC Energy Division staff, in consultation with the Santa Clara County Agricultural Commissioner and Santa Clara County Open Space Authority.”
3.3 Air Quality				
37	3.3-30	1 st paragraph	“Given the relatively large scope of ground disturbance that would occur under the Project, implementing only the basic BMPs could result in a potentially significant impact per BAAQMD’s recommended approach for evaluation of fugitive dust emissions.”	While the Project as a whole includes a large area of disturbance, most of the disturbance areas associated with transmission line construction are located within paved and landscaped areas which do not generate high levels of fugitive dust. Utilization of standard dust control Best Management Practices (BMPs), as outlined in APM AQ-2, would be sufficient to reduce impacts to a less-than-significant level.
38	3.3-31	Mitigation Measure 3.3-2a	“LSPGC shall ensure that at least 75 percent of equipment horsepower hours related to off-road construction equipment include Tier 4 Final emissions controls for all construction locations except the Grove and Skyline HVDC Terminals. LSPGC shall ensure that 100 percent of all off-road construction equipment used at the terminal sites is Tier 4 Final compliant. An initial listing that identifies each off-road unit’s certified tier specification to be operated for the Project shall be submitted to the CPUC for review and approval before the start of construction activities. Construction activities shall not begin until the equipment listing has been submitted to and approved by the CPUC.	LSPGC requests that the requirement to provide documentation for new or replacement construction equipment to be approved before use on the project be eliminated as this is logistically difficult to implement without causing significant construction delays. We suggest adding the documentation of new and replacement equipment as a component to the tracking tool that will be submitted to the CPUC on a monthly basis.

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			As LSPGC requires new or replacement construction equipment on the Project, LSPGC shall document verification of the certified engine tier and provide such documentation to the CPUC for approval before its use on Project sites. Before the start of construction, LSPGC shall develop an off-road construction equipment-use hours tracking tool and procedure. Construction activities shall not begin until the tracking tool and procedure have been submitted to and approved by the CPUC. The tracking tool shall be utilized by LSPGC to keep track of the certified engine tier and daily equipment use hours of all off-road diesel-powered equipment. If all off-road construction equipment is Tier 4 Final certified, the tracking tool is not required. The tracking tool shall be maintained by LSPGC, and tracking updates shall be submitted to the CPUC monthly to track the Project’s compliance. The updated tracking tool shall be submitted to the CPUC no later than the 10th day of the following month.”	In addition, LSPGC requests that the Tier 4 requirement be only applicable to the Grove Terminal site. LSPGC’s response to Data Request 3 (Attachment B Updated Air Quality Emissions) includes the following statement: “LSPGC shall ensure that at least 75 percent of all off-road construction equipment includes Tier 4 interim or Tier 4 final emissions controls for all construction locations with the exception of the Grove terminal. Due to the close proximity of homes to the Grove terminal, LS Power shall ensure that 100 percent of all off-road construction is Tier 4 interim or Final.”
39	3.3-32	Mitigation Measure 3.3-2c	“LSPGC shall implement all of the following best management practices, which would reduce fugitive PM10 and PM2.5 emissions:”	The intent of the BAAQMD fugitive dust mitigation measures is to ensure that visible fugitive dust emissions do not cross property lines. As such, we request that the language of MM 3.3-2c be revised to reflect this and to prevent unreasonable and unnecessary requirements and suggest adding the language below: “LSPGC shall implement all of the following best management practices, which would reduce fugitive PM10 and PM2.5 emissions:” In addition, LSPGC recognizes that the list of Best Management Practices for Construction-Related Fugitive Dust Emissions referenced in MM 3.3-2b originates from the Bay Area Air Quality Management District (BAAQMD’s) California Environmental Quality Act (CEQA) Guidelines. However, upon review of the list of the basic and enhanced measures, we request the following changes be made to adapt these measures to a linear Project, as well as to make them feasible to implement during construction: “All trucks and equipment, including their tires, shall be washed off or otherwise cleaned prior to leaving the site.” We request that this condition not apply to Project locations in developed/paved areas. “All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.” We request that this condition not apply to Project locations in developed/paved areas. “All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.” Please add that this requirement may be adjusted during rain events as needed (similar to the APM AQ-2). “Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have a maximum of 50 percent air porosity.” This measure can be implemented at the terminal sites and staging yards

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				but is not feasible for the linear Project components. As such, we suggest limiting this measure to only terminal sites and staging yards. Please add note that some of the measures involving erosion control and revegetation may be superseded by the Project’s SWPPP requirements.
40	3.3-32	Mitigation Measure 3.3-2c	“Post publicly visible sign with the telephone number....”	Mitigation Measure 3.3-2c doesn’t say where signs are to be posted. LSPGC suggests posting signs at the terminal site locations and staging yards.
3.4 Biological Resources				
41	3.4-14	1 st paragraph 3.4.2.2	“The following fish and wildlife species were identified with a moderate potential to occur:”	For consistency with the PEA, this should read "...moderate or higher potential to occur:”
42	3.4-42	Mitigation Measure 3.4-1	“Rare plant surveys conducted under APM BIO-2 shall be floristic in nature and shall be conducted by a qualified botanist according to procedures outlined in the CDFW publication Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Natural Communities (CDFW 2018b). The survey(s) shall be conducted in early, mid-, or late spring, in conjunction with the blooming seasons of those rare plants with moderate potential to occur in the survey area. If no special-status plants are observed during appropriately timed surveys conducted by a qualified botanist, it shall be assumed that the construction activity will have no impact on special-status plants and no further action is required. If special-status plants are identified within the survey area, the individuals or populations shall be mapped and quantified and reported to the CNDDDB, and the project manager shall be notified so that potential impacts on these known occurrences will be avoided or minimized. Coordination with CDFW and/or USFWS staff shall be conducted to establish appropriate avoidance and minimization measures if the species is federally or State listed. Avoidance and minimization measures may include: (1) No-disturbance buffers. The size of the buffer would typically be 25–50 feet but may be increased or decreased by the biologist depending on the plant species and surroundings. (2) Work windows for low-impact activities that are compatible with the dormant phase of a special-status plant life cycle but that may kill living plants or severely alter their ability to reproduce. (3) Silt fencing or construction fencing to prevent vehicles, equipment, and personnel from accessing the occupied habitat. (4) Erosion control BMPs such as straw wattles made of rice straw, erosion control blankets, or hydroseeding with a native plant seed mix to prevent sedimentation from upslope construction activities. (5) In consultation with and as authorized by CDFW or USFWS, collection and spreading of seeds or relocation of plants to appropriate locations by a qualified botanist.”	While LSPGC agrees that rare plants should be addressed and mitigated through the CEQA process, utilities are exempt from Fish and Game Code FGC 1913: “(b) Notwithstanding the provisions of Section 1911, timber operations in accordance with a timber harvesting plan submitted pursuant to the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 (Chapter 8 (commencing with Section 4511) of Part 2 of Division 4 of the Public Resources Code), or required mining assessment work pursuant to federal or state mining laws, or the removal of endangered or rare native plants from a canal, lateral ditch, building site, or road, or other right-of-way by the owner of the land or the owner's agent, or the performance by a public agency or a publicly or privately owned public utility of its obligation to provide service to the public, shall not be restricted by this chapter because of the presence of rare or endangered plants, except as provided in subdivision (c) of this section.” As such, LSPGC would request that the language in the mitigation measure referencing a California Department of Fish and Wildlife (CDFW) Incidental Take Permit (ITP) permit be removed. We also ask that this utility exemption be added to the Regulatory Setting section of the Biological Resources Section.

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43	3.4-53	Mitigation Measure 3.4-4	“At least 30 days before the completion of Project activities, the Applicant shall submit a restoration plan to CDFW for review and written approval. No restoration activities shall commence until the restoration plan has been approved by CDFW in writing...”	LSPGC requests that this measure be modified to only be required for areas of construction that would be in delineated State or Federal jurisdictional waters. As currently written, this measure as written may delay the start of construction activities in upland and disturbed/developed habitats. Please revise to “Before construction in areas containing waters of the U.S. and/or State, the applicant shall obtain all required environmental permits...” and “At least 30 days before the scheduled commencement of Project activities within waters of the U.S. and/or State, the applicant shall submit...”
44	3.4-58	Mitigation Measure 3.4-5	“All removal of street trees within the jurisdictional limits of the City of San José and Santa Clara County shall be coordinated with the responsible department in each jurisdiction (see Section 3.4.3) to obtain any necessary tree removal permits. LSPGC shall comply with all permit conditions, including tree replanting and monitoring to ensure successful replanting. LSPGC shall provide copies of the approved permits from the applicable jurisdictions before the start of construction.”	Please revise this section to apply only to ministerial tree removal permits. Per GO 131-D, LSPGC is exempt from local discretionary approvals issued pursuant to local authority (including discretionary tree removal permits).
45	3.4-58	Mitigation Measure 3.4-5	“...LSPGC shall provide copies of the approved permits from the applicable jurisdictions before the start of construction.”	LSPGC suggests the following change to MM 3.4-5, “LSPGC shall provide copies of the approved permits from the applicable jurisdictions before the start of construction in the vicinity of a street tree being coordinated. ”
46	3.4-78	Last reference (USFWS 2025b)	“USFWS (U.S. Fish and Wildlife Service). 2025b. Information for Planning and Consultation (IPaC) Resource List (Power the South Bay Project). Retrieved January 2025. Available: https://ecos.fws.gov/IPaC/ . Accessed June 2025.”	This reference lists the IPaC resource list for LSPGC’s Power the South Bay project. The instance of “Power the South Bay” should be revised to “Power Santa Clara Valley”.
3.5 Cultural Resources				
47	3.5-12 and -13	Section 3.5.4, Table 3.5-1	Resource P-43-000571 is mentioned twice in 3.5 Cultural Resources of the DEIR: 3.5.4 Cultural Resources Identified within the Project Area (pages 3.5-12 to -13) – describes resource P-43-000571 as “an indigenous habitation site with human remains” that has “not been evaluated for the California Register” and is therefore treated as eligible for the California Register and therefore as a historical resource per CEQA. Table 3.5-1 Cultural Resources Identified in the Project Area (3.5-13) - line 5 lists P-43-000571 as a historical resource per CEQA (boldface) described as a “Habitation site with human remains” with California Register Eligibility status as “Not previously evaluated; assumed eligible”.	The discussion regarding P-43-000571 (SCL-000576) in 3.5.4 and listing in Table 3.5-1 appears to be a typographical error that occurred during drafting of the DEIR. The site description and California Register eligibility are incorrectly identified. P-43-000571 (SCL-000576) is consistently identified in the Cultural Resource Technical Report (Mengers et al. 2024), the Proponent’s Environmental Assessment (PEA, April 2024), and the resources DPR 523 site form on file with the California Historical Resource Information System (CHRIS) as a “Lithic scatter and fire-cracked rock” that has been extensively tested and recommended Not Eligible for the National Register and California Register (Scher 2014). No human remains have been encountered at this site at any time. Within the DEIR text, the following should be corrected within Section 3.5.4 Cultural Resources Identified within the Project Area: • Add resource P-43-000571 to the “these resources are not historical resources, are not unique archaeological resources, and have no potential to be affected by the Project” paragraph (3.5.4 second paragraph, page 3.5-12) • Remove resource P-43-000571 from the “have not been evaluated” paragraph (top of page 3.5-13) On Table 3.5-1, the following should be corrected:

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				• The entry for P-43-000571 should not be shown in boldface, as it is not a Historical Resource per CEQA • The Description field should be “Lithic scatter and fire-cracked rock”, not “Habitation site with human remains” • The California Register Eligibility field should be “Previously evaluated; recommended not eligible for the California Register”, not “Not previously evaluated; assumed eligible”
48	3.5-13	Table 3.5-1 and page 3.5-13	Table 3.5-1 and the following text. “Therefore, there are six historical resources in the Project area. Table 3.5-1, Cultural Resources Identified in the Project Area, provides additional details. Historical resources are designated in boldface.” (page 3.5-13)	Table 3.5-1 Cultural Resources Identified in the Project Area is misleading since it includes resources on the Downtown Alignment Alternative 1 without identifying them as such. The following resources shown in Table 3.5-1 are only located within the Downtown Alignment Alternative 1 and not within the main Project alignment: • P-43-000141 • P-43-000369 • P-43-001056 Each of these resources is also incorrectly included in summary text preceding Table 3.5-1 in Section 3.5.4 Cultural Resources Identified within the Project area and are incorrectly included in counts of resources within the Project area: • Paragraph 1: “nine cultural resources were identified in the Project area: four pre-contact resources and five historic-era resources” incorrectly includes all three above resources • Paragraph 3: “Two cultural resources in the Project area have been recommended or determined eligible for listing in the California Register and qualify as historical resources under CEQA” incorrectly includes resource P-43-000141 • Paragraph 4: “Four resources have not been evaluated for the California Register” incorrectly includes resources P-43-000369 and P-43-0001056 • Paragraph 5: “Therefore, there are six historical resources in the Project area” incorrectly includes all three above resources Resources P-43-000141, P-43-000369, and P-43-001056 should be removed from Table 3.5-1 since the Table purports to show only cultural resources identified in the Project area. Text: The resource counts should be corrected in Section 3.5.4 as follows: • Paragraph 1: “...six nine cultural resources were identified in the Project area: three four pre-contact resources and five three historic-era resources” • Paragraph 3: “One two cultural resources in the Project area has been recommended or determined eligible for listing in the California Register and qualifies as a historical resource under CEQA” • Paragraph 4: “One four resources has not been evaluated for the California Register”

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				Paragraph 5: “Therefore, there are six two historical resources in the Project area” The following additional edits are requested within the text on page 3.5-13, paragraph two: “Four of these resources are not historical resources, are not unique archaeological resources, and have no potential to be affected by the Project. <u>P-43-000571, a lithic scatter with fire-cracked rock, has been subject to extensive archaeological testing and was previously recommended as not eligible for the California register (Scher 2014).</u> P-43-00116, the San Jose B Station, was previously recommended as not eligible for the California Register and this evaluation is concurred with by the CPUC (PanGIS 2024). P-43-002628, the historic alignment of the El Camino Real/Juan Bautista de Anza Historic Trail, was previously recommended as not eligible for the California Register but is listed locally. However, this resource is solely the historic alignment of a road. P-43-002629, Keesling’s Shade Trees, was also previously determined not eligible for the California Register and is not considered a historical resource.”
49	3.5-16	APM CUL-4	“The temporary construction staging areas shall be surveyed prior to construction. If additional proposed facilities and ground-disturbing activities move outside the previously surveyed acreage, the new areas shall be subjected to a cultural resources inventory to ensure that any newly identified cultural resources are either avoided by project redesign or evaluated and treated.”	Edits made to this APM in LSPGC’s Deficiency Response #1 are not reflected in the DEIR version of the APM.
50	3.5-25	Significance after Mitigation	[Significant and unavoidable]	As discussed in the preceding comments, the nature and location of known cultural resources within and surrounding the Proposed Project features is incorrect and misleading. DEIR Table 3.5-1 outlines nine potential cultural resources in the Project area. The DEIR impact analysis discussion takes these resources into account, then extrapolating that the potential for undiscovered resources is also high. Within the DEIR (Section 3.5.5), the overall cultural sensitivity is based primarily on these known, documented resources. However, the impacts associated with the Project are exaggerated based on the information and clarifications provided in the preceding comments. Specifically, three of the sites listed in DEIR Table 3.5-1 are located along an alternative route, not the Proposed route. Therefore, the Proposed Project does not have potential to impact these resources. Of the remaining 6 sites that are potentially within the Project area, four have been evaluated and recommended or determined not to be eligible for listing on the California Register. Of the remaining two sites, one (P-43-000189) was determined eligible for the National and California Registers. However, as detailed in the Cultural Resources Technical Report (PanGIS, 2024), this site appears to be mis-mapped in the NWIC database. This site is associated with the PG&E project component, and the majority of the corrected map site is not located within the Proposed Project APE. The final site that is located within the Project area (P-43-000449) has not been previously evaluated and therefore is presumed eligible for the California Register. This site was originally recorded in 1980, and was not relocated during additional surveys

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				conducted in 1981, 1983, 2000, and 2023 (Proposed Project surveys). Furthermore, this site is not located within the Proposed Project APE. Particularly in light of these factual clarifications, the APMs, BMPs, and mitigation measures identified in the DEIR (specifically LSPGC APMs CUL-1 through CUL-5 and TCR-1 to TCR-2; PG&E BMPs CULT-1 through CULT-5; LSPGC Mitigation Measure 3.5-1; and PG&E Mitigation Measure 3.5-1), are more than sufficient to ensure impacts are less than significant with mitigation. The Final EIR should reflect these impact conclusions. The measures identified in the DEIR provide robust, comprehensive protections consistent with applicable law to ensure the project does not cause significant impacts to cultural or tribal resources. For example, in addition to providing worker education and archaeological and Native American monitoring, these measures require work to immediately stop in the event of unanticipated discoveries of cultural resources, consistent with CEQA Guidelines Section 15064.5. (See APM CUL-1 through CUL-5; BMP CULT-1 through CULT-3, CULT-4; MMs 3.5-1). Furthermore, the measures identified in the DEIR prioritize preservation in place if historical, archaeological, or tribal cultural resources are present, consistent with Guidelines Section 15126.4(b)(3)(A) and Public Resources Code Section 21084.3. (See APM CUL-3, LSPGC MM 3.5-1, PG&E MM 3.5-1.) Preservation in place would ensure adverse impacts are avoided altogether. But even in the highly unlikely event that data recovery through excavation is the only feasible mitigation option, the cultural resource measures of the EIR comply with Guidelines Section 15126.4(b)(3)(C) by requiring treatment plans that ensure recovery of scientifically consequential information and require consultation with CPUC and Tribes to make sure recovered materials are treated properly and curated at appropriate facilities or transferred to appropriate Tribal organizations. (See APM CUL-3, CUL-5, LSPGC MM 3.5-1, PG&E MM 3.5-1). Additional safeguards would apply in the event human remains are discovered. Specifically, APM CUL-3 and CUL-5 and BMP CULT-5 require compliance with the Guidelines Sections 15126.4(b)(3)(C) and 15064.5(d)-(e), Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.98. LSPGC and its archaeologists have been unable to identify any additional feasible mitigation. In light of the corrections and clarifications to DEIR Table 3.5-1 provided within LSPGC’s comments herein, and the established legal and technical adequacy of the CPUC’s prescribed mitigation, LSPGC asserts that impacts to cultural and tribal cultural resources should be less than significant with implementation of mitigation.
3.9 Hazards and Hazardous Materials				

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51	3.9-39	Section 3.9.6.4	Cross-references to Mitigation Measure	Mitigation Measure 3.13-1a (Nighttime Construction Noise Plan) is cross-referenced four times in this section. The second and third instance omit the “1” (preceding the “a”), which should be added to correctly reference the intended measure.
3.10 Hydrology and Water Quality				
52	3.10-17	APM WQ-1	“Recovered groundwater shall be contained on-site and tested prior to discharge;”	Please revise to: “Recovered groundwater shall be contained on-site and tested prior to discharge;”
53	3.10-28	3 rd paragraph	“Among the directives in LSPGC APM WQ-1 is the requirement that during dewatering activities, the Project shall contain the recovered groundwater on-site and test it before discharge.”	Please revise to: “Among the directives in LSPGC APM WQ-1 is the requirement that during dewatering activities, the Project shall contain the recovered groundwater on-site and test the recovered groundwater it before discharge.”
3.13 Noise				
54	3.13-8	3 rd paragraph	“Noise-sensitive receptors near the site of the proposed Skyline HVDC Terminal are multifamily residential units approximately 200 feet to the east, across SR 87 on Coleman Avenue.”	Please revise to: “Noise-sensitive receptors near the site of the proposed Skyline HVDC Terminal are multifamily residential units approximately 200 feet to the east, across SR 87 on Coleman Avenue Ryland Street. ”
55	3.13-22	1 st paragraph	“All Project construction activity would be consistent with the time-of-day restrictions established by local ordinances, as discussed above.”	Suggest deleting this sentence which seemingly contradicts surrounding sentences.
56	3.13-23	Table 3.13-10	Table 3.13-10	Distances listed in Table 3.13-10 in reference to the Grove Terminal site represent worst case scenarios, occurring when construction equipment would be active nearest these receptors. However, it should be noted that the Grove Terminal site is large in relation to these receptors, and as such construction equipment’s distance from receptors will vary by construction phase, and day-to-day within a given construction phase. This is misleading as construction equipment will most often be located further from these receptors, resulting in lower noise levels.
57	3.13-23	2 nd paragraph	“In addition to the transmission line construction noise levels presented in Table 3.13-10, construction noise for driving of sheet piles during transmission line construction would occur for shoring of trenchless installation pits. Horizontal boring machines would also generate high noise levels.”	LSPGC does not intend to utilize sheet piling to shore the installation pits associated with the horizontal directional drilling (HDD). Hence, HDD pits are not anticipated to require driving sheet piles. Noise generated by horizontal boring machines is generally comparable to other heavy construction equipment and significantly less noisy than the use of an impact pile driver. LSPGC requests the following revisions to the text on DEIR page 3.13-32: “...construction noise for driving of sheet piles during transmission line construction would could occur for shoring of trenchless installation pits.
58	3.13-26 and 3.13-27	Mitigation Measure 3.13-1a	“The plan shall include documentation that a variance from the municipal code of the applicable local jurisdiction (i.e., the City of San José or Santa Clara County) has been received.”	The requirement in the first bullet point of MM 3.13-1a for the Project to receive a noise variance from the applicable code of the applicable local jurisdiction conflicts with GO 131-D Section XIV.B, which “clarifies that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction.” Since local noise standards and noise variances are not applicable to the Project, we recommend that this bullet point be deleted in its entirety.
59	3.13-26 and 3.13-27	Mitigation Measure 3.13-1a	“...shall be submitted to the CPUC for review and approval at least 30 days before the start of the subject nighttime construction activities”	Submittal of a Nighttime Construction Noise Plan at least 30 days prior to the start of construction may not always be possible and could result in construction delays.

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				Suggest MM 3.13-1a be revised to instead require that Nighttime Construction Noise Plans must be approved by the CPUC prior to commencement of applicable construction activities.
60	3.13-27 and 3.13-28	Mitigation Measure 3.13-1b	“LSPGC and/or its contractors shall develop a construction noise reduction and logistics plan for residences within 500 feet of the Grove HVDC Terminal site...”	The Grove HVDC terminal site is shown as the property boundary in Figure 2-6 however, construction noise would predominately be occurring inside the Grove terminal’s perimeter wall. Suggested revisions are as follows: “LSPGC and/or its contractors shall develop a construction noise reduction and logistics plan for residences within 500 feet of the Grove HVDC Terminal site perimeter wall. ”
61	3.13-27 and 3.13-28	Mitigation Measure 3.13-1b	“LSPGC and/or its contractors shall develop a construction noise reduction and logistics plan ... for residences within 500 feet of trenchless installation pits in unincorporated Santa Clara County ...”	The requirement for preparation of a Construction Noise Reduction and Logistics Plan for the horizontal directional drill (HDD) (i.e., “trenchless” installation) is predicated on the assumption of driving sheet piles to shore the installation pits associated with the HDD. However, HDD pits are not anticipated to require driving sheet piles. Therefore, LSPGC requests that Mitigation Measure 3.13-1b is revised to clarify that preparation of the Construction Noise Reduction and Logistics Plan be required for trenchless construction only if driving of sheet piles is required within 500 feet of residences. Suggested revisions are as follows: “LSPGC and/or its contractors shall develop a construction noise reduction and logistics plan ... for residences within 500 feet of trenchless installation pits in unincorporated Santa Clara County if driving sheet piles is required for installation pit shoring. ”
62	3.13-27 and 3.13-28	Mitigation Measure 3.13-1b	“The plan shall be submitted to the CPUC for review and approval at least 60 days before the start of construction activities.”	Submittal of the Construction Noise Reduction and Logistics Plan at least 60 days prior to the start of construction at the Grove Terminal is not possible without causing potential construction delays. Suggest MM 3.13-1b be revised to instead require that the Construction Noise Reduction and Logistics Plan must be approved by the CPUC prior to commencement of applicable construction activities.
63	3.13-27 and 3.13-28	Mitigation Measure 3.13-1b	“The proposed perimeter wall at the Grove HVDC Terminal shall be installed as part of the first phase of construction activities at the terminal site.”	Only the northwestern boundary of the Grove Terminal site is located within 500 feet of residences. Therefore, only that associated segment of perimeter wall should be required to be constructed as part of the first phase of construction. LSPGC request that Mitigation Measure 3.13-1b is clarified accordingly: “The proposed perimeter wall along the northwestern boundary of the Grove HVDC Terminal shall be installed as part of the first phase of construction activities at the terminal site.”
64	3.13-30	Table 3.13-12	Table 3.13-12	Table 3.13-12 does not appear to account for any noise reduction from the terminal perimeter wall. However, DEIR Appendix E2 does include a noise reduction factor for the terminal perimeter wall. The absence of this noise reduction factor affects the severity of noise impacts associated with operation of the Grove Terminal. While implementation of MM 3.13-2 will ultimately demonstrate the operation noise emissions, Table 3.13-12 overstates impacts. LSPGC requests that Table 3.13-12 be updated to also include estimate noise levels with the perimeter noise wall reduction factor, as calculated in Appendix E2.

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65	3.13-30 and 3.13-31	Mitigation Measure 3.13-2	“ LSPGC shall retain an acoustical engineer/specialist to prepare a noise characterization and reduction report. The report shall identify ambient noise levels near the Grove HVDC Terminal site...”	This mitigation measure is based on the premise that the Grove HVDC Terminal site will be selected for implementation. LSPGC recommends that the language be revised as follows to clarify that this measure is applicable only if construction occurs as the Grove HVDC Terminal site: “ If the Grove HVDC Terminal site is selected for implementation , LSPGC shall retain an acoustical engineer/specialist to prepare a noise characterization and reduction report. The report shall identify ambient noise levels near the Grove HVDC Terminal site...”
66	3.13-30 and 3.13-31	Mitigation Measure 3.13-2	“The noise characterization and reduction plan shall be submitted to the City, County, and the CPUC for review and approval.”	Local Agency involvement should be limited to review and comment, with potentially discretionary approvals being limited to the CPUC. LSPGC requests that the City and County component of approval is deleted from this measure as the CPUC Is the lead agency under CEQA and is responsible for compliance during construction and operations.
67	3.13-32	Last paragraph	“The highest vibration levels during Project construction would likely be generated by the use of a vibratory or impact pile driver to install sheet piles in support of trenchless construction installation pits for the proposed transmission lines.”	LSPGC does not intend to utilize sheet piling to shore boring pits. Slide rails are the preferred method. Slide rails do not require pile driving or similarly high vibratory equipment or methods. Therefore, it is strictly true that the Project <i>may</i> result in vibration levels up to 0.65 in/sec <i>if</i> driving sheet piles are utilized. LSPGC requests the following revisions to the text on DEIR page 3.13-32: “ The highest vibration levels during Project construction could would likely be generated by the use of a vibratory or impact pile driver to install sheet piles in support of trenchless construction installation pits for the proposed transmission lines.”
68	3.13-32	Last paragraph	“Horizontal boring activities could also generate vibration at levels similar to those of a vibratory or impact pile driver. According to the Caltrans Transportation and Construction Vibration Manual, both impact pile driving and vibratory pile driving typically generate vibration levels of 0.65 in/sec PPV at a distance of 25 feet (Caltrans 2020).”	Within the impact discussion for vibration, the DEIR states that horizontal boring can generate vibration levels similar to those of a vibratory or impact pile driver. However, while the DEIR substantiates the level of vibration from pile driving (Caltrans 2020), it does not provide support or sourcing for boring to results in similar levels of vibration. The Final EIR should include sufficient reference for the vibratory emissions of horizontal boring, or remove this statement. In addition, LSPGC does not plan to conduct horizontal borings utilizing pipe ramming or similar machinery. Rather, LSPGC intends to utilize jack-and-bore or micro-tunneling techniques, which would produce substantially less vibration than pipe ramming or similar equipment. Such impact discussions should appropriately state high vibration impacts could occur, <i>if</i> the Project utilizes high vibratory equipment instead of the jack-and-bore or micro-tunneling machinery.
69	3.13-33	2 nd paragraph	“The San José Marriott would be exposed to a vibration level of 0.23 to 0.65 in/sec PPV, which is equivalent to 95–104 VdB. At this distance, vibration levels would exceed the building damage threshold (0.20 in/sec PPV), ...”	As discussed in previous comments, the worst-case vibration impacts described in the DEIR resulting from trenchless construction are based on presumed usage of pile driving sheet piles for bore pit shoring. However, as previously explained, LSPGC does not intend to utilize driven sheet piles for shoring unless other methods, such as slide rails, are not feasible. Therefore, the impact analysis should be amended to state that impacts <i>could</i> occur, instead of statement that such impact <i>would</i> occur. LSPGC suggests edits as follows: “The San José Marriott could would be exposed to a vibration level of 0.23 to 0.65 in/sec PPV if a vibratory or impact pile driver is needed to install sheet piles ,

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				which is equivalent to 95–104 VdB. At this distance, vibration levels would exceed the building damage threshold (0.20 in/sec PPV) if pile-driven sheets are utilized, ...”
70	3.13-33	3 rd paragraph	“...trenchless construction activities within 50 feet of structures would exceed the vibration level significance thresholds. In addition, City of San José General Plan Policy EC-2.3 discourages the use of impact pile drivers within 125 feet of any buildings. Therefore, the vibration impact from trenchless construction activities would be potentially significant. ”	As outlined in previous comments, trenchless construction activities could result in high levels of vibration if pile-driven sheets are utilized to shore bore pits. These effects could exceed thresholds within 50 feet of vibration sensitive structures. However, LSPGC does not intend to utilize these methods unless other methods are not feasible. Therefore, the vibration impacts from trenchless construction could be potentially significant only if pile driving methods are utilized. LSPGC requests the vibration impact discussion be updated accordingly. Suggested text edits are provided below: “...trenchless construction activities within 50 feet of structures could exceed the vibration level significance thresholds, if high-vibratory equipment or methods are used. In addition, City of San José General Plan Policy EC-2.3 discourages the use of impact pile drivers within 125 feet of any buildings, consistent with LSPGC’s intent to utilize slide rail or other non-pile-driven methods. Therefore, the vibration impact from trenchless construction activities could would be potentially significant, if impact pile driving equipment or methods are utilized.
71	3.13-33 and 3.13-34	Mitigation Measure 3.13-3	“LSPGC and/or its construction contractors shall conduct a site survey along segments of the proposed transmission line alignments where trenchless construction techniques may occur within 50 feet of existing structures. If construction with high vibratory equipment occurs within 50 feet of structures, a vibration monitoring for high-vibratory equipment contingency plan shall be implemented.”	As discussed in previous comments, it is the intent of LSPGC to implement slide rails or other non-pile-driven methods for shoring of bore pits. Therefore, trenchless construction within 50 feet of structures may or may not exceed thresholds. The trigger for such potentially significant impacts is the type of equipment utilized, not the trenchless construction itself. Therefore, MM 3.13-3 should be revised to ensure that it is clear that a site survey is not required unless high vibratory equipment is planned to be used. Additionally, some sections of the MM refer to the trenchless areas while others refer to the final transmission line alignments. Please ensure the areas applicable to the MM are consistently referenced throughout the MM.
72	3.13-34	Mitigation Measure 3.13-3, Last Bullet	“The results of all vibration monitoring shall be summarized and submitted in a report shortly after substantial completion of trenchless construction that occurs within 50 feet of structures.”	LSPGC requests edits to MM 3.13-3, last bullet, as follows: “The results of all vibration monitoring shall be summarized and submitted in a report shortly after substantial completion of trenchless construction utilizing high-vibratory equipment that occurs within 50 feet of structures.”
3.17 Transportation				
73	3.17-15	Mitigation Measure 3.17-1a	“ LSPGC shall coordinate with Project proponents, contractors, and local agencies, as applicable, for other construction projects in the Project vicinity that may temporally overlap with Project construction, such as projects identified as potentially contributing to cumulative effects. In consideration of these coordination efforts, at least 30 days before the issuance of construction or building permits, LSPGC shall prepare and implement a traffic control plan for roadways adjacent to and directly affected by the Project. The traffic control plan shall address the transportation impact(s) of the temporally overlapping construction projects within the Project vicinity...”	LSPGC and the other nearby projects will be subject to encroachment permitting through the affected municipalities prior to beginning work that requires traffic control plans. As such, the municipalities processing the encroachment permit applications will be optimally positioned to review the potential for overlapping traffic effects and potentially interacting traffic control plans prior to the start of construction for any given project. This will provide the affected municipalities with ample opportunity to impose appropriate encroachment conditions and/or require coordination between applicants prior to construction. As such, a CPUC requirement to prepare a coordinated traffic control plan would likely lead to duplicative efforts, increased costs, and delays to the start of construction, without

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				providing more value in terms of avoiding and minimizing traffic impacts than the affected municipalities would provide through the normal course of their encroachment permitting processes. Considering these factors, LSPGC requests that MM 3.17-1a be removed and that APM TRA-1 not be superseded.
74	3.17-15	Mitigation Measure 3.17-1a	“LSPGC’s traffic control plan, with proof of coordination, shall be submitted to the CPUC 30 days before the start of construction.”	If MM 3.17-1a is not removed as requested by LSPGC, submittal of proof of coordination 30 days before the start of construction is not possible without causing potential construction delays. LSPGC suggests that MM 3.17-1a be revised to instead require that the proof of coordination be submitted to the CPUC prior to commencement of applicable construction activities.
75	3.17-15 and 3.17-16	Mitigation Measure 3.17-1b	“After completion of the repair of any damaged roads, sidewalks, trails, and bicycle facilities resulting from Project construction activities, LSPGC shall submit a report to the CPUC and other jurisdictions whose facilities have been affected by Project construction (e.g., city, county, state, etc.). This report will confirm that repairs are consistent with preconstruction conditions and in accordance with applicable requirements...”	With implementation of APM TRA-3 (Repair Infrastructure), it is unclear why Mitigation Measure 3.17-1b is required to reduce potential impacts to less than significant, given that the APM and Mitigation Measure provide an identical level of assurance regarding infrastructure repair. Although the mitigation measure includes a reporting requirement that the APM does not explicitly specify, LSPGC’s reporting requirements under the MMCRP will ensure that compliance with the infrastructure repair APM is documented. As such, the requirements of the APM and the mitigation measure are not substantively different, so we request that CPUC remove MM 3.17-1b be removed since the APM is sufficient.
3.18 Tribal Cultural Resources				
76	3.18-6	APM TCR-2	APM TCR-2: Native American Monitoring “Native American monitoring shall be conducted during ground disturbance associated with the Project when within 100 feet (30 meters) of previously recorded prehistoric, ethnohistoric, or TCRs. Prehistoric and/or ethnohistoric archaeological sites have been recorded within the Project area, and the SLF search and Tribal outreach indicates that lands sacred to sacred to the Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, the Ohlone Indian Tribe, the Tamien Nation, and the Amah Mutsun Tribal Band are present within the Project search area. A Native American monitor determined during Tribal consultation shall be retained by LSPGC to monitor excavation associated with the Project to ensure that there is no impact to any significant unanticipated prehistoric, ethnohistoric, or TCR. Prior to construction, LSPGC shall confer with a designated Tribal representative on the appropriate course of action to be taken should unanticipated cultural materials, and specifically human remains, be discovered during construction. Native American monitoring requirements established in this APM may be superseded by government-to-government consultation conducted between the CPUC and Tribal organizations as part of the AB 52 process or otherwise.”	Edits made to this APM in LSPGC’s Deficiency Response #1 are not reflected in the DEIR version of the APM.
77	3.18-8 to 3.18-9	Last paragraph	“APM TCR-2 contradicts the legal requirements regarding the treatment of human remains under PRC Sections 5097.98 and 5097.99, as well as Health and Safety Code Section 7050.5, because the treatment plan in the event of human remains is determined by the Most Likely Descendant (MLD), who is designated by the NAHC following the discovery of Native American human	The statement that APM TCR-2 contradicts legal requirements is incorrect. APM TCR-2 provides in pertinent part: “Prior to construction, LSPGC shall confer with a designated tribal representative on the appropriate course of action to be taken should

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			remains. It is not possible to determine who the MLD will be for human remains identified during Project construction before a discovery is made.”	unanticipated cultural materials, and specifically human remains, be discovered during construction. Native American monitoring requirements established in this APM may be superseded by government-to-government consultation conducted between the CPUC and tribal organizations as part of the AB 52 process or otherwise.” Nothing in APM TCR-2 conflicts with PRC Sections 5097.98 (discovery of Native American human remains), 5097.99 (possessing Native American artifacts or human remains taken from graves), or Health and Safety Code Section 7050.5 (discovery of human remains) because this measure does not require (or even encourage) LSPGC to predetermine the MLD before a discovery is made or otherwise conflict with applicable law. Instead, this measure simply requires additional, pre-discovery conferral with designated tribal representatives regarding the appropriate course of action to be taken in the event of unanticipated discoveries. An “appropriate course of action” must necessarily be compliant with applicable laws such as PRC Sections 5097.98 and 5097.99, and Health and Safety Code Section 7050.5. Considering APM TCR-2 in the context of other APMs reinforces this point. Relevant here, APM CUL-5 makes clear that in the event human remains are discovered at the project site and the remains are determined to be Native American, “NAHC shall then identify the person or persons it believes to be the most likely descendant of the deceased Native American, who in turn shall make recommendations for the appropriate means of treating the human remains and any associated funerary objects.” APM CUL-5 similarly requires compliance with CEQA Guidelines Section 15064.5(d)-(e), which in turn requires compliance with PRC Section 5097.98. Likewise, APM CUL-3 requires compliance with the requirements of Guidelines Section 15126.4(b)(3)(C); that regulation, in turn, requires compliance with Health and Safety Code Section 7050.5 (which in turn requires compliance with PRC 5097.98). In other words, APMs CUL-3 and CUL-5 expressly require that treatment of any unanticipated Native American remains is performed in accordance with applicable law; APM TCR-2 does not contradict applicable law, but instead supplements it by requiring additional, pre-discovery consultation with designated tribal representatives. LSPGC requests that the Final EIR reflect this correction.
3.19 Utilities and Service Systems				
78	3.19-15	APM UTIL-1	“LS Power shall notify all utility companies with utilities located within or crossing the Proposed Project ROW to locate and mark existing underground utilities along the entire length of the Proposed Project. Due to the linear nature of transmission line construction, utilities shall be marked in short segments at least 14 days prior to construction within said segments.”	MM 3.19-5 now requires notification of all municipalities, companies, and other public and private entities owning and maintaining utilities within or crossing the right-of-way of the Project and identification of any utilities present. Therefore, LS Power would request that APM UTIL-1 be modified to require marking prior to construction within said segments without a specific timeframe.
79	3.19-26	6 th paragraph	“The industry standard from Section 6.6.2 of National Association of Corrosion Engineers SP21424- 2018, Alternating Current Corrosion on Cathodically Protected Pipelines: Risk Assessment, Mitigation and Monitoring, states that	Pursuant to Section 6.2 of the National Association of Corrosion Engineers SP21525- 2018 Alternating Current Corrosion on Cathodically Protected Pipelines: Risk Assessment, Mitigation and Monitoring, the AC current density should not exceed a

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			AC corrosion may occur when pipeline AC density levels increase above a time-weighted average of 30 amperes per square meter. AC potentials less than 2 volts would result in AC density levels less than this limit for pipelines with typical soil resistivity measurements and would result in a less-than-significant impact (LSPGC 2025). A preliminary analysis of the Project’s potential for electromagnetic interference and induced current touch potential was completed and is provided in Appendix F.”	time-weighted average of: 30 amperes per square meter if DC current density exceeds 1 ampere per square meter or 100 amperes per square meter if DC current density is less than 1 ampere per square meter. Maintaining induced AC potential to less than 2 volts is not referenced in this standard, which was provided in LSPGC’s Preliminary Induction Study only as an estimate based on certain general assumptions to achieve the AC current densities cited in the above-referenced standard. LSPGC requests the time-weighted average current density values cited above be updated accordingly and the reference to maintaining an induced AC voltage of less than 2 volts be removed. Note the industry standard referenced should be Section 6.2.
80	3.19-28	Mitigation Measure 3.19-5	“At least 90 days prior to the start of construction, LSPGC shall notify all municipalities, companies, and other public and private entities owning and maintaining utilities within or crossing the right-of-way of the Project and shall positively identify and confirm the location and type of any utilities present. For those identified utilities that do not pose a threat of AC-induced corrosion attributable to the Project, APM UTIL-1 shall be implemented. For the identified natural gas pipelines, and all other utilities potentially affected by Project-related AC-induced corrosion (i.e., metallic utilities), design and construction of the Project’s transmission lines shall be coordinated with the applicable utility owners to definitively locate each utility relative to the Metcalf to Grove 500 kV AC underground transmission line, determine the distance of separation between the transmission line and potentially affected utility, and determine the point of intersection and/or distance along which the Project transmission line is parallel to the utility. LSPGC shall prepare a detailed induction study for all identified existing utilities potentially affected by the Project transmission line alignments. At minimum, the study shall include, but not be limited to, a detailed analysis of the known [metallic] pipelines or other utilities identified during these utility surveys; shall identify adequate and implementable measures to avoid corrosion potential; and shall present commitments to the implementation of those actions, including a design of the AC mitigation system for any pipeline found to have an AC potential of 2 volts or greater and a schedule to implement any required AC mitigation systems. Pursuant to Section 6.6.2 of National Association of Corrosion Engineers SP21424-2018, Alternating Current Corrosion on Cathodically Protected Pipelines: Risk Assessment, Mitigation and Monitoring, the induction study shall demonstrate that any required mitigation system would reduce the AC potential to less than 2 volts, or an AC density level of less than a time-weighted average of 30 amperes per square meter. “ “No less than 60 days prior to the start of construction, LSPGC shall submit the full induction study, including the AC mitigation component, to the CPUC for review and concurrence. Once the CPUC concurrence is secured, LSPGC shall implement the AC mitigation system during construction of the Project, phased into the construction process as appropriate.”	AC induced corrosion effects are limited to coated, metallic, pipelines paralleled by the Metcalf to Grove 500 kV AC underground transmission line, rather than all metallic pipelines. LSPGC requests the reference to metallic pipelines should be updated to specify coated and metallic pipelines. Pursuant to Section 6.2 of the National Association of Corrosion Engineers SP21525-2018 Alternating Current Corrosion on Cathodically Protected Pipelines: Risk Assessment, Mitigation and Monitoring, the AC current density should not exceed a time-weighted average of: 30 amperes per square meter if DC current density exceeds 1 ampere per square meter or 100 amperes per square meter if DC current density is less than 1 ampere per square meter. Maintaining induced AC potential to less than 2 volts is not referenced in this standard, which was provided in LSPGC’s Preliminary Induction Study only as an estimate based on certain general assumptions to achieve the AC current densities cited in the above-referenced standard. LSPGC requests the time-weighted average current density values cited above be updated accordingly and the reference to maintaining an induced AC voltage of less than 2 volts be removed. Note the industry standard referenced should be Section 6.2. LSPGC requests the induction study for applicable utilities within a given segment of the Project be provided prior to the start of construction of such segment. Because the Project is linear in nature, it is not efficient to condition the beginning of any construction activities on the completion of the induction study for the entire Project, particularly those segments that contain no existing pipelines susceptible to Project-induced corrosion effects. Therefore, any pre-construction Mitigation Measures that apply to specific segments of the Project, such as MM 3.19-5, need only be completed prior to start of construction within such segment. If Mitigation Measure 3.19-5 is retained within the Final EIR, LSPGC suggests the following revision to the timing: <u>“No less than 60 days</u> Prior to the start of construction <u>of a Project segment containing an underground utility or utilities identified to be materially affected by accelerated corrosion caused by the Project,</u> LSPGC shall submit the full induction study <u>for such Project segment,</u> including the AC mitigation component, to the CPUC for review and concurrence. Once the CPUC concurrence is secured,

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				LSPGC shall implement the AC mitigation system prior to energization of the Project, phased into the construction process as appropriate.”
3.20 Wildfire				
81	3.20-3	Figure 3.20-1	N/A	It’s unclear what the orange hatched area located west of the Metcalf substation represents, as there is no orange hatching defined in the map legend.
4 Alternatives				
82	4-2	1 st paragraph	“The No Project Alternative analysis evaluates the existing conditions at the time the Notice of Preparation was published (i.e., July 29, 2024),...”	Please note that July 29, 2024 was the publication date for Power the South Bay’s NOP. September 6, 2024 is the date Power Santa Clara Valley’s NOP was published and the date in this section should be updated accordingly.
83	4-5	4.5.1.1	“The High Voltage Alternating Current (HVAC) Alternative would connect the existing PG&E Metcalf and PG&E San Jose B substations with an alternating current (AC) transmission line in which the current reverses direction periodically, as opposed to a single direct current (DC) line which carries electricity in a single, constant direction. An AC system, in which high voltages are carried long distances and then stepped down near end-users, typically includes three-phase generators, step-up and step-down transformers, circuit breakers, and devices such as capacitor banks or reactors to help manage voltage and reactive power. The HVAC Alternative would reduce potentially significant impacts associated with construction and operation of the proposed HVDC terminals because HVDC terminals would not be required for this alternative. However, the HVAC transmission line would be less efficient than a DC transmission line over long distances and would result in greater capacitive losses. The HVAC transmission line would also require wider rights-of-way and less precise control of power flow compared to the Project.”	LSPGC suggests the following modifications to this section: “The High Voltage Alternating Current (HVAC) Alternative would connect the existing PG&E Metcalf and PG&E San Jose B substations with an alternating current (AC) transmission line in which the current reverses direction periodically, as opposed to a single direct current (DC) line which carries electricity in a single, constant direction. An AC system, in which high voltages are carried long distances and then stepped down near end-users, typically includes three-phase generators, step-up and step-down transformers, circuit breakers, and devices such as capacitor banks or reactors to help manage voltage and reactive power. The HVAC Alternative would reduce potentially significant impacts associated with construction and operation of the proposed HVDC terminals because HVDC terminals would not be required for this alternative. However, the HVAC transmission line would be less efficient than a DC transmission line over long distances and would result in greater capacitive losses. <u>The HVAC transmission line would not provide power flow control or dynamic voltage support.</u> The HVAC transmission line would also require <u>larger duct banks and splice vaults wider rights-of-way and less precise control of power flow</u> compared to the Project.”
84	4-5	4.5.1.2, 1 st paragraph	“Therefore, the HVAC Alternative would not improve transmission of energy from existing and proposed renewable generation projects to the Greater San Francisco Bay Area (Greater Bay Area).”	LSPGC suggests adding the following to this section: “Therefore, the HVAC Alternative would be <u>less effective than the HVDC Alternative in improving transmission of energy</u> from existing and proposed renewable generation projects to the Greater San Francisco Bay Area (Greater Bay Area).”
85	4-6	4.5.2.1	“This alternative would involve installation of utility-scale energy storage facilities that would be charged from the existing 230 kV San José system. There would be two battery energy storage systems (BESS) installed for this alternative; one would be installed at the proposed Skyline high-voltage direct current (HVDC) Terminal site, and one would be installed at the proposed Grove HVDC Terminal site. A 500 kV transmission line would connect the Grove Terminal BESS to the existing PG&E Metcalf Substation and a 230 kV transmission line would connect the Skyline Terminal BESS to the existing San Jose B Substation.”	Please revise to, “This alternative would involve installation of utility-scale energy storage facilities that would be charged from the existing 230 kV San José <u>electric transmission</u> system. There would be two battery energy storage systems (BESS) installed for this alternative; one would be installed at the proposed Skyline high-voltage direct current (HVDC) Terminal site, and one would be installed at the proposed Grove HVDC Terminal site. A 500 kV transmission line would connect the Grove Terminal BESS to the existing PG&E Metcalf Substation and a 230 <u>115</u> kV transmission line would connect the Skyline Terminal BESS to the existing San Jose B Substation.”

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86	4-9	Figure 4-2	N/A	LSPGC suggests updating the area of Grove Terminal Alternative 3 in Figure 4-2 to match the HVDC terminal site shown in Figure 4-4b. Additionally, Figure 4-2 currently shows a horizontal bore for the 320 kV HDD of Coyote Creek near Metcalf Road but does not capture HDDs for other creek crossings of Fisher Creek and Coyote Creek. Please update Figure 4-2 to capture all or none of the HDDs.
87	4-13	1 st paragraph	“The Metcalf to Grove 500 kV Transmission Line would require a trenchless crossing (e.g., jack-and-bore or horizontal directional drill [HDD]) of the existing railroad and the Grove to Skyline 320 kV Transmission Line would require a trenchless crossing of the existing railroad and Coyote Creek to reach the GTA-4 property.”	Please revise to, “The Grove to Skyline 320 Metcalf to Grove 500 -kV Transmission Line would require a trenchless crossing (e.g., jack-and-bore or horizontal directional drill [HDD]) of the existing railroad and the Metcalf to Grove 500 Grove to Skyline 320 kV Transmission Line would require a trenchless crossing of the existing railroad and Coyote Creek to reach the GTA-4 property.”
88	4-16	4.5.7.1	“The Metcalf to Grove Transmission Line Alignment Alternative 2 would exit the proposed Grove Terminal underground toward the southwest, then follow Monterey Road for approximately 0.4 mile before turning northeast (see Figure 4-3). South of Coyote Creek the transmission line would transition to an overhead configuration and would be attached to the bottom of a new vehicular road bridge to cross the creek. The vehicular road bridge would also replace the existing failing culverts within the main and secondary Coyote Creek channels. The transmission line would then transition back underground and continue northeast, then northwest within Coyote Ranch Road until reaching the proposed PG&E Metcalf Substation modification area. This alternative would be approximately 1.3 miles in length and would be located underground except for the road bridge segment crossing Coyote Creek.”	LSPGC suggests the following revisions: “The Metcalf to Grove Transmission Line Alignment Alternative 2 would exit the proposed Grove Terminal underground toward the southwest, then follow Monterey Road for approximately 0.4 mile before turning northeast (see Figure 4-3) and crossing over Coyote Creek attached to a new vehicular road bridge. South of Coyote Creek the transmission line would transition to an overhead configuration and would be attached to the bottom of a new vehicular road bridge to cross the creek. The vehicular road bridge would also replace the existing failing culverts within the main and secondary Coyote Creek channels. The transmission line would then transition back underground and continue northeast, then northwest within Coyote Ranch Road until reaching the proposed PG&E Metcalf Substation modification area. This alternative would be approximately 1.3 miles in length and would be located underground except for the road bridge segment crossing Coyote Creek.
89	4-18/4-19	Last/1 st paragraphs	“The area is designated as critical habitat for steelhead trout, and the California red-legged frog and western pond turtle have the potential to occur in the vicinity of the bridge location where suitable habitat exists.”	LSPGC suggests the following revisions: “The area is designated as critical habitat for steelhead trout, and the California red-legged frog and western pond turtle have the potential to occur in the vicinity of the bridge new above ground structure locations where suitable habitat exists.”
90	4-24	Figure 4-4b	N/A	Original Grove to Skyline 320 kV transmission line (blue) and GTA-3 Grove to Skyline 320 kV transmission line (purple) are both shown on this figure. This figure is specific to GTA-3 so it should only show the relevant Grove to Skyline 320 kV transmission line.
91	4-26	2 nd to last paragraph	“Finally, constructing the Grove HVDC Terminal at the GTA-3 site would substantially shorten the length of the Metcalf to Grove 500 kV Transmission Line connection to the existing PG&E Metcalf Substation, from approximately 1.2 miles if the proposed Grove HVDC Terminal site were selected, to approximately 100 feet or less using the GTA-3 site.”	Please make the following correction, “Finally, constructing the Grove HVDC Terminal at the GTA-3 site would substantially shorten the length of the Metcalf to Grove 500 kV Transmission Line connection to the existing PG&E Metcalf Substation, from approximately 1.2 miles if the proposed Grove HVDC Terminal site were selected, to approximately 200 feet 100 feet or less using the GTA-3 site.”
92	4-26	Last paragraph	"As discussed in Section 3.5, Cultural Resources, GTA-3 would have similar impacts related to cultural resources, which would be reduced to a less-than-significant level with mitigation.”	DEIR Section 3.5 does not discuss alternatives. Sentence should be revised to clearly reference impacts of the Proposed Project, as described in Section 3.5, would be

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				similar for GTA-3. Section 3.5 also concludes that impacts would be significant and unavoidable.
93	4-30	4 th paragraph	“...installation of the Grove to Skyline 320 kV Transmission Line under this alternative could increase impacts to cultural resources and tribal cultural as there could be potentially sensitive cultural resources along Market Street (e.g., potential unrecorded subsurface archaeological materials).”	Downtown Alignment Alternative 2 follows the same route as the proposed alignment in Market Street and is in Market Street for approximately 300 feet less than the proposed alignment. Therefore, there should not be any additional sensitive cultural resources along Market Street than those captured in the proposed alignment.
94	4-31	2 nd paragraph	“...installation of the Grove to Skyline 320 kV Transmission Line under this alternative could increase impacts on cultural resources and tribal cultural as there could be potentially sensitive cultural resources along Market Street (e.g., potential unrecorded subsurface archaeological materials).”	Downtown Alignment Alternative 2 follows the same route as the proposed alignment in Market Street and is in Market Street for approximately 300 feet less than the proposed alignment. Therefore, there should not be any additional sensitive cultural resources along Market Street than those captured in the proposed alignment.
5. Other CEQA Considerations				
95	5-2	3 rd paragraph	“Furthermore, construction of the Project would result in 19 acres of permanent disturbance on vegetation communities associated with the proposed transmission lines, proposed HVDC terminals, proposed modifications to the existing PG&E substations, and temporary staging areas.”	The DEIR Project Description table 2-5 lists a total of 20 acres of permanent disturbance. Included in these 20 acres of permanent disturbance is acreage within existing Metcalf and San Jose B substations as well as the Skyline Terminal. These Project features, totaling approximately 11.5 acres of the total 20 acres of permanent disturbance, are not vegetation communities. These features are currently disturbed or developed.
96	5-4	3 rd paragraph	“The Project would not generate energy, but it would contribute to the energy supply by storing electricity during times of excess generation and dispatching it to the grid when needed.”	We suggest rewording this statement to, “The Project would not generate energy, rather the Project would provide an additional pathway for existing generation.”
97	5-5	Section 5.2	“The Project would: cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 (see Impact 3.5-1 in Section 3.5, Cultural Resources) and disturb any human remains, including those interred outside of dedicated cemeteries (see Impact 3.5-2 in Section 3.5), which would result in significant and unavoidable environmental effects.”	In Section 5.2 Significant Unavoidable Environmental Effects there is a missing word in the discussion of CEQA regulatory Section 15064.5 regarding human remains. Corrected text is listed below. The Project would: cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 (see Impact 3.5-1 in Section 3.5, Cultural Resources) and may disturb any human remains, including those interred outside of dedicated cemeteries (see Impact 3.5-2 in Section 3.5), which would result in significant and unavoidable environmental effects.

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Editorial Suggestions				
1	Figure Numbering and Lettering	N/A	e.g., “Figure 2-3a” and “Figure 3.1-3A”	Chapter 2 uses lowercase letters in figure sequencing while some of Chapter 3 uses capital letters.
2	Global Comment	N/A	SOURCE: LS Power, 2024	The source cited for several figures is LS Power instead of LSPGC (e.g., Figure 1-1, 2-1, 2-3a through d, etc.).
3	ES-3, 1-4	ES.3 bullet 5, 1.3.2 Bullet 4	California's Renewables Standard Portfolio	California's Renewables <u>Portfolio Standard</u>
4	ES-16	Table ES-3		Define SU in the notes section at the bottom of the table.
5	ES-29	2 nd to last paragraph	“As discussed, under Section 4.6.2, placing the proposed Grove HVDC Terminal...”	Remove the comma after “discussed.”
6	1-8	2 nd to last paragraph	“Pursuant to CEQA Guidelines 15082, both, English and Spanish NOPs were also sent to the Santa Clara County Clerk-Recorder’s Office.”	Remove the comma after “both.”
7	1-9	3 rd paragraph	“Three hundred and ninety-four members of the public and six public agencies submitted written comments on the project.”	Capitalize Project to be consistent with the rest of the document.
8	2-5	2 nd paragraph of 2.3.3	“The Grove to Skyline 320 kV DC underground transmission line would be located in PLSS Township 8 South, Range East; Township 8 South, Range 1 East; and Township 7 South, Range 1 East.”	A number is missing in this description. It should be PLSS Township 8 South, Range <u>2</u> East;...
9	2-18	Figure 2-5	Skyline to San Jose B 115 kV AC Tie Line	The legend still has 115 kV instead of 230 kV as the voltage of the tie line.
10	2-31	1 st paragraph	“The access road at the proposed Grove HVDC Terminal would approximately 300 feet to be 20 feet wide.”	The access road at the proposed Grove HVDC Terminal would be approximately 300 feet long and 20 feet wide.
11	2-31	1 st paragraph of 2.6.6	“...the same lengths as the proposed Grove to Skyline 320 kV Transmission line and proposed Metcalf to Grove 500 kV Transmission line, respectively.”	Capitalize both occurrences of “line” so be consistent with the naming conventions in the rest of the document.
12	2-33	2 nd paragraph	“...13 miles for the proposed Grove to Skyline 320 Transmission Line and 1.2 miles for the proposed Metcalf to Grove 500 kV Transmission Line.”	Insert kV behind 320 and before Transmission Line.
13	2-40	1 st paragraph	“...where approved by the local agency (e.g., City of San José).”	Do not capitalize city to be consistent with the rest of the document.
14	2-46	2 nd to last paragraph	“...material would be hauled off-site, stockpiled, or disposed of consistent with regulatory requirements A total of 5,000 CY of cut material would be...”	Insert a comma between sentences (i.e., after “requirements” and before “A”).
15	2-47	1 st paragraph of 2.8.4	“As discussed in Section 2.6.2, <i>Transmission Lines</i> ,...”	The heading for Section 2.6.2 is <i>New Transmission Lines</i> .
16	2-56	5 th paragraph	“...to minimize the likelihood of an unintentional returned of HDD drilling fluids to the surface or frac-out.”	Return not returned
17	2-63	1 st paragraph	“...for the Skyline HVDC terminal...”	Capitalize Terminal to be consistent with the rest of the document.
18	2-79	Table 2-7, Estimated Start Date column	March 2026 2026	Remove the second occurrence of 2026.
19	2-82	2 nd paragraph	“Heavy truck traffic on city-maintained roadways would require a City of San José traffic control permit.”	Do not capitalize city to be consistent with the rest of the document.
20	2-89	4 th paragraph	“The transmission line inspections would be performed by qualified technicians through sensors, and splice vault inspections.”	Remove the comma.

Comment Number	DEIR Page #	DEIR Paragraph or Table #	Original DEIR Text	Editorial Suggestion
21	2-105	APM TCR-2	Prehistoric and/or ethnohistoric archaeological sites have been recorded within the Project area, and the SLF search and Tribal outreach indicates that lands sacred to sacred to the Muwekma Ohlone Indian Tribe of the San Francisco Bay Area	Prehistoric and/or ethnohistoric archaeological sites have been recorded within the Project area, and the SLF search and Tribal outreach indicates that lands sacred to sacred to the Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
22	3.1-3, etc.	Section 3.1 Aesthetics	San José B Substation	It appears most if not all occurrences of this substation name in the Aesthetics section still contain the accent on the “e”. Remainder of the document has removed the accent.
23	3.10-2	Figure 3.10-1a	Skyline to San Jose B 115 kV Station Tie Line	The legend still has 115 kV instead of 230 kV as the voltage of the tie line.
24	3.10-30	Last paragraph	Impact C.3.10-3: The Project, in combination with the cumulative projects, would not substantially alter the existing drainage pattern of the site or area through the alteration of the course of a stream or river nor through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site. (Less than Significant)	Use boldface for Impact C.3.10-3 and its description. Change <i>Less than Significant</i> to italics.
25	3.17-24	Impact 3.17-7 Heading	<i>Impact 3.17-7: Project construction could substantially delay public transit. (Less than Significant with Mitigation)</i>	Italicize <i>Less than Significant with Mitigation</i> instead of the impact and description to be consistent with the rest of the document.
26	4-1	1 st paragraph	“This comparison is based on the analysis of environmental impacts of the Project provided in Chapter 3, <i>Environmental Setting, Impacts, and Mitigation Measures</i> .”	The title of Chapter 3 is <i>Environmental Analysis</i> .
27	4-2	2 nd paragraph	“...and from the CEQA team identified in Chapter 6, <i>Report Preparation</i> , as part of the EIR development process.”	The title of Chapter 6 is <i>Report Preparers</i> .
28	4-4	1 st paragraph	“...(see Table 4-5, <i>Summary of Impacts of the Project and Alternatives</i>).”	The table referenced here is Table 4-11.
29	4-11	Last paragraph	“The Owen House was originally built and owned by Jehial M. Owen., who is considered a Coyote Valley pioneer (Department of Parks and Recreation 2005).”	There are two punctations following Jehial M. Owen. Delete the period and keep the comma.
30	4-11	Last paragraph	“According the California Department of Parks and Recreation, the Owen House is eligible under California Register Criterion 3 or National Register Criterion C,...”	Insert “to” following “according.”
31	4-12	Last paragraph before Table 4-4	“ Table 4-4 , <i>Screening: Grove Terminal Alternative 1</i> , provides a brief explanation of the reasons underlying the CPUC’s determination.”	The title of the referenced table should be <i>Screening: Grove Terminal Alternative 2</i> .
32	4-18/4-19	Last/1 st paragraph	“The area is designated as critical habitat for steelhead trout, and the California red-legged frog and western pond turtle have the potential to occur in the vicinity of the bridge location where suitable habitat exists.”	The area is designated as critical habitat for steelhead trout, and the California red-legged frog and western pond turtle have the potential to occur in the vicinity of the bridge where suitable habitat exists.
33	4-22	1 st paragraph	“and would instead include construction of a 200-foot Metcalf to Grove 500 kV transmission tie line”	“and would instead include construction of an approximately 200-foot Metcalf to Grove 500 kV transmission tie line”
34	4-22	2 nd paragraph	“Additionally, PG&E would relocate an overhead distribution line to be underground along the northwestern boundary of the GTA-3 site parallel to the 320 kV underground transmission line to accommodate the new terminal layout (LSPGC 2025b; PG&E 2025).”	“Additionally, PG&E would relocate an overhead distribution line to be underground along the northwestern boundary of the GTA-3 site parallel to the 320 kV underground transmission line to accommodate the new terminal layout (LSPGC 2025b; PG&E 2025).”
35	4-25	1 st paragraph	“The construction schedule for the Metcalf to Grove 500 kV Transmission Line and the Grove to Skyline 320 kV Transmission Line would be reduced due to the shorter lengths of the line.”	The last word in this sentence should be plural (i.e., lines).
36	4-29	3 rd paragraph, etc.	“This alternative combine installing the...”	In several subsections under 4.6.5, the first sentence should use the word “combines” instead of “combine.”

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37	4-35	Table 4-11	e.g., Impact 3.1-2: LSM (same than the Project) because this alternative...	Conduct a global search for sentences that read “same than the Project” and replace with “same as the Project.”
38	4-35	Table 4-11	e.g., No Impact (same as the Project) because the project under Alternative 1 would not be visible from designated or eligible state scenic highways due to distance.	There are two occurrences on this page where “Alternative 1” appears to be incorrectly referenced, once under the Impacts of Alternative Combination 2 and once under the Impacts of Alternative Combination 4.
39	4-35	Table 4-11	Impact C.3.1-1: LTS (same as the Project) (same as the Project) because GTA-3, in combination with cumulative project No. 77, would not cumulatively conflict with applicable zoning and other regulations governing scenic quality in the area.	Delete repeated “(same as the Project)”
40	4-36	Table 4-11	“ Criterion c: The Project would not conflict with existing zoning for, or cause rezoning of, forest land...” “ Criterion d: The Project would not result in the loss of forest land or conversion of forest land to non-forest use.	Insert “No Impact.” after each colon to be consistent with the rest of the table.
41	4-41	Table 4-11	Impact 3.6-1: LTS. The Project could result in wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of resources, during Project construction or operation.	Use boldface for “Impact 3.6-1: LTS” instead of the description.
42	4-50	Table 4-11	“ Cumulative – Criterion b: The Project would not contribute to any cumulative impacts related to this criterion.”	Insert “No Impact.” After the colon to be consistent with the rest of the table.
43	5-2	Last paragraph	“As discussed in Section 3.9, <i>Hazards and Hazards Materials</i> , construction...”	The title of Section 3.9 is <i>Hazards and Hazardous Materials</i> .