

December 2, 2022

Eric Chiang  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

**Re: SCE's Responses to the Second CPUC Deficiency Letter on the Application for a Permit to Construct: Control-Silver Peak Project and Proponent Environmental Assessment (PEA): A.21-08-009**

Dear Mr. Chiang:

Please see the document titled TLRR CSP PEA Deficiency Letter 2\_WF-5 and WF-11 Responses, included in this submittal for SCE's responses to the CPUC's July 15, 2022 PEA deficiency letter.

SCE looks forward to working with your team to continue to process the Control-Silver Peak Project. Should you have any questions or concerns, please feel free to contact me at (626) 302-6734 or [David.Balandran@sce.com](mailto:David.Balandran@sce.com).

Sincerely,

*/s/ David Balandran*

David Balandran  
Senior Advisor, Regulatory Affairs  
Southern California Edison Company

Enclosures

## WF-5 Values at Risk

This section states, “There is no rare habitat along the CSP Project alignment that is at risk from wildfire.” However, maps displayed in Section 5.4 Biological Resources indicate areas of sensitive and protected plants; all are at risk of a wildfire, since they are biomass. These are values at risk from wildfire and should be included in this analysis. The habitat overlaid with hazard/threat layer, or layered with the result of a customized analysis of fire threat is required here.

The analysis should include a table of the number of structures within a reasonable distance of the project area, categorized by fire hazard severity zones. Alternatively, the values at risk could be described using the CAL FIRE Vulnerability or threat Index.

Incorporate response into model assessment. Since the vulnerability is dependent on the age and physical setting of the structures, the values at risk based on both these attributes need to be described. The general distribution of structure ignition-resistance should be presented, both in terms of either the age of the building or construction and design features of the building and location of the structure in the general landscape (i.e., its position on the slope or placement in a hazardous area).

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## RESPONSE

SCE performed an analysis to identify the presence of “sensitive and protected plants” as well as sensitive habitat in a ‘High’ or ‘Moderate’ Fire Hazard Severity Zone within a distance of 1,000 feet of where work under the CSP Project would occur. The following were identified:

Vegetation Alliance		Vegetation Association
Goodding's Willow – Red Willow Riparian Woodland and Forest	<i>Salix gooddingii</i> – <i>Salix laevigata</i> Forest and Woodland Alliance	<i>Salix laevigata</i> Association
Fremont's and Nevada Smokebush Scrub	<i>Psorothamnus fremontii</i> – <i>Psorothamnus polydenius</i> Shrubland Alliance	<i>Psorothamnus arborescens</i> Provisional Association <i>Psorothamnus polydenius</i> – ( <i>Psorothamnus arborescens</i> ) Association
Red-osier Dogwood - Interior Rose - Currant Thickets	<i>Cornus sericea</i> – <i>Rosa woodsii</i> – <i>Ribes</i> spp. Shrubland Alliance	<i>Rosa woodsii</i> Association
Arroyo Willow Thickets	<i>Salix lasiolepis</i> Shrubland Alliance	<i>Salix lasiolepis</i> Association
Greasewood Scrub	<i>Sarcobatus vermiculatus</i> Shrubland Alliance	<i>Sarcobatus vermiculatus</i> Association <i>Sarcobatus vermiculatus</i> - <i>Atriplex confertifolia</i> Association
Blackbrush Scrub	<i>Coleogyne ramosissima</i> Shrubland Alliance	<i>Coleogyne ramosissima</i> Association
Shadscale Scrub	<i>Atriplex confertifolia</i> Shrubland Alliance	<i>Atriplex confertifolia</i> – <i>Krascheninnikovia lanata</i> Association
Alkali Sacaton - Scratchgrass - Alkali Cordgrass Alkaline Wet Meadow	<i>Sporobolus airoides</i> – <i>Muhlenbergia asperifolia</i> – <i>Spartina gracilis</i> Herbaceous Alliance	<i>Muhlenbergia asperifolia</i> - <i>Distichlis spicata</i> Provisional Association
Yerba Mansa - Nuttall's Sunflower - Nevada Goldenrod Alkaline Wet Meadows	<i>Anemopsis californica</i> – <i>Helianthus nuttallii</i> – <i>Solidago spectabilis</i> Herbaceous Alliance	<i>Anemopsis californica</i> Association
Ashy Ryegrass – Creeping Ryegrass Turfs	<i>Leymus cinereus</i> – <i>Leymus triticoides</i> Herbaceous Alliance	<i>Leymus triticoides</i> Association

Hardstem and California Bulrush Marshes	<i>Schoenoplectus (acutus, californicus)</i> Herbaceous Alliance	<i>Schoenoplectus acutus</i> Association
Cattail Marshes	<i>Typha (angustifolia, domingensis, latifolia)</i> Herbaceous Alliance	<i>Phragmites australis subsp. americanus</i> Provisional Association

SCE has identified a distance of 1,000 feet to represent a “reasonable distance” from the CSP Project.<sup>1</sup> SCE identified fewer than two dozen residential structures within 1,000 feet of the existing and proposed CSP Project alignments and construction support areas.

Approximately 12 potentially-residential structures, and approximately 30 light industrial and institutional structures, in the community of Laws in Segment 3 are located in a CALFIRE High Fire Hazard Severity Zone. These structures are located in Wildland Urban Interface areas characterized as Low Density Intermix and Low Density Interface. The residential and institutional structures are not known to include any structure ignition-resistance features, and the residential structures are typical of the types and ages of residential structures found in this portion of the Owens Valley. The light industrial structures tend to be steel clad with steel roofs, and thus are relatively ignition-resistant. All structures are located in an area with little topographical relief.

Approximately 4 residences along SR-168 north of Deep Springs College, approximately 3 potentially-residential structures in the Fish Lake Valley adjacent to Segment 3, and the Deep Springs College at the southern terminus of Segment 4 are located within 1,000 feet of the CSP Project alignment; these structures are located in areas outside of any Fire Hazard Severity Zone. These structures are located in Wildland Urban Interface areas characterized as Uninhabited Vegetation and Very Low Density Vegetation. These structures are located in areas with little topographical relief; the structures are generally of wood-frame construction with composition roofs, and are not known to include any structure ignition-resistance features.

Other values-at-risk include steel tower and wood pole electrical infrastructure in Segments 1, 2, and 3, and a private recreational facility (shooting range) within 1,000 of Segment 2. Some of the electrical infrastructure and the private recreational facility are located in a CALFIRE High Fire Hazard Severity Zone; all are located in Wildland Urban Interface areas characterized as Uninhabited Vegetation.

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<sup>1</sup> SCE has identified a distance of 1,000 feet to represent a “reasonable distance”; this is the distance used to identify sensitive receptors for air quality- and noise-related impact analyses, and is the distance to which the CPUC may notify landowners.

## WF-11 Wildland Urban Interface

These maps are not interpreted in the text. Does this relate to potential impacts? The designations on the maps are not used in the analysis, or useful in analyzing significance. An analysis should use wildfire threats (rate of fire spread, flame lengths, fireline intensity, or combination thereof) overlaid with the population density data. Provide additional descriptions in the text and total acres of project areas in each category.

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### RESPONSE

The Wildland-Urban Interface figureset was provided solely in response to the CPUC *Guidance* document:

#### 5.20.1.1: High Fire Risk Areas and State Responsibility Areas

- a) Identify areas of high fire risk or State Responsibility Areas (SRAs) within the project area. Provide GIS data for the Wildland Urban Interface (WUI) and Fire Hazard Severity Zones (FHSZ) mapping along the project alignment. Include areas mapped by CPUC as moderate and high fire threat districts as well as areas mapped by CalFire.

It is SCE's understanding that the CPUC has reviewed the FlamMap data and "believe[s] it satisfies several of the outstanding wildfire-related deficiencies". SCE takes this to mean that further SCE-developed wildfire modeling will not be necessary, and that "wildfire threats (rate of fire spread, flame lengths, fireline intensity, or combination thereof)" referenced in deficiency WF-11 can be developed by the CPUC utilizing the FlamMap data and Wildland-Urban Interface GIS data, both of which were provided previously.

In response to WF-11, and in the absence of SCE-provided modeling, SCE proposes the following textual changes in Section 5.20.1.1, High Fire Risk Areas and State Responsibility Areas:

"The majority of the CSP Project alignment, including the central and eastern portions of Segment 3 and all areas where work would be performed in Segments 4 and 5, is located within the CAL FIRE moderate fire hazard severity zone. The majority of the remainder of the alignment, including the majority of Segment 1, the entirety of Segment 2, and the western portion of Segment 3, is located within the CAL FIRE high fire hazard severity zone. Small sections of the eastern portion of Segment 3 are located in undesignated areas. Tabular information on the miles of CSP Project alignment located within these zones is presented in Table 5.20-1a below, and shown graphically on Figure 5.20-1, Fire Hazard Severity Zones.

Wildland-urban interface (WUI) information is presented graphically in Figureset 5.20-2; the miles of the CSP Project alignment and acres of potential disturbance associated located within each WUI category are presented in Table 5.20-1b. The WUI represents those areas where human development meets or intermingles with undeveloped wildland vegetation; the WUI categories can be used as an indicator of potential severity of risk to people and the built environment from wildfires; the High Density Interface indicates that large numbers of people and structures could be impacted by a wildfire, while the Very Low Density Vegetation indicates that smaller numbers of people and structures could be impacted by a wildfire.

**Table 5.20-1a: Segment Miles of CSP Project Alignment within Designated Fire Hazard Severity Zones**

Project Segment	Fire Hazard Severity Zone	Distance (miles)	SRA (miles)	LRA (miles)	FRA (miles)	CPUC FTA (miles)
1	High	2.55	2.53	0	0.02	3.3
1	Moderate	0.75	0	0	0.75	
2	High	1.5	1.5	0	0	--
3	High	6.6	6.6	0	0	--
3	Moderate	30.6	30.2	0.35	0	
3	Unzoned	0.8	0	0.73	0.03	
4	High	1.4	1.4	0	0	--
4	Moderate	15.8	7.6	0.5	6.7	
5	Moderate	2.4	0	1.2	1.2	--
<b>Total</b>		<b>62.4</b>	<b>49.83</b>	<b>2.78</b>	<b>7.5</b>	<b>3.3</b>

Acronyms:

FRA: Federal Responsibility Area

FTA: Fire-Threat Area

LRA: Local Responsibility Area

SRA: State Responsibility Area

**Table 5.20-1b: Segment Miles of CSP Project Alignment and Acres of Disturbance by Wildland-Urban Interface Category**

<b>Wildland-Urban Interface Category</b>	<b>Miles of CSP Alignment</b>	<b>Acres of Disturbance</b>
<u>High Density Interface</u>	<u>N/A</u>	<u>N/A</u>
<u>High Density Intermix</u>	<u>N/A</u>	<u>N/A</u>
<u>High Density No Vegetation</u>	<u>N/A</u>	<u>N/A</u>
<u>Low Density Interface</u>	<u>0.22</u>	<u>3.2</u>
<u>Low Density Intermix</u>	<u>2.1</u>	<u>N/A</u>
<u>Low Density No Vegetation</u>	<u>N/A</u>	<u>N/A</u>
<u>Medium Density Interface</u>	<u>N/A</u>	<u>N/A</u>
<u>Medium Density Intermix</u>	<u>N/A</u>	<u>N/A</u>
<u>Medium Density No Vegetation</u>	<u>N/A</u>	<u>N/A</u>
<u>Uninhabited No Vegetation</u>	<u>1.1</u>	<u>9.1</u>
<u>Uninhabited Vegetation</u>	<u>48.1</u>	<u>415.0</u>
<u>Very Low Density No Vegetation</u>	<u>1.5</u>	<u>10.4</u>
<u>Very Low Density Vegetation</u>	<u>7.5</u>	<u>54.5</u>
<u>Water</u>	<u>0.06</u>	<u>0.05</u>