David Balandran
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September 16, 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_Short-Term Responses, included in this submittal for SCE's responses to the CPUC's July 15, 2022 PEA deficiency letter. The response matrix includes responses to the deficiencies SCE and the CPUC have agreed to as short-term deficiencies.

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.

Sincerely,

/s/ David Balandran

David Balandran
Senior Advisor, Regulatory Affairs
Southern California Edison Company

Enclosures

NB: Where changes to PEA text are suggested by a noted deficiency, the relevant PEA text is provided in the Response/Modified Text column; text to be added is shown in red and underline, text to be deleted is shown in red and strikethrough.

PEA Deficiencies Section or Page #	Comment Code	Deficiency	Response/Modified Text
Chapter 3: Proposed Project Description			
Section 3.5.1.1.1 Table 3.5-1	3-14	**Existing Access Roads: Widths** The access road in upper Silver Canyon is narrow (10 feet wide in some stretches) with some significant tight and steep switchback turns. Provide the width that segment of road would be modified to and the minimal radius turn needed to be accommodate the vehicles anticipated as listed in Table 3.6-1. **Provide the results of the road inventory identified in the initial deficiency response. Identify and describe alternate construction methods or equipment that would be utilized, where needed as a result of the inventory survey.**	The previously-identified road inventory will no longer be necessary; SCE's TROW program will be performing regularly scheduled maintenance along the access roads in 2022 (and subsequent years as necessary), and the CSP Project will utilize the access roads "as is" at the start of construction. In areas where the roadways are narrow or winding, helicopter construction has been identified.
Section 3.5.1.1.2	3-15	**Existing Access Road Modifications** The extent and scope of the existing road rehabilitation needs to be assessed at this time, barring unforeseen conditions that could result from slides, washouts, or other slope failures. Provide additional details on the items below including the exact location, dimension (lengths and widths), disturbance area, and any necessary improvements (e.g., gravel placement). • Widening of the existing roadbed at curves and other locations. • Installation of new, or repair of existing, wet crossings, water bars, overside drains and pipe culverts to allow for construction traffic usage, as well as to prevent road damage due to uncontrolled water flow. Provide a description of the type of matting proposed as part of road rehabilitation. **Identify and describe expected road rehabilitation/culvert protection/etc. activities as indicated in the initial deficiency response.**	The previously-identified road inventory will no longer be necessary; SCE's TROW program will be performing regularly scheduled maintenance along the access roads in 2022 (and subsequent years as necessary), and the CSP Project will utilize the access roads "as is" at the start of construction. In areas where the roadways are narrow or winding, helicopter construction has been identified.
Section 3.5.1.4.2	3-17	**Bridge or Culvert Replacement or Installation** Locations where new or replacement culverts are necessary as part of access rehabilitation need to be identified in the PEA. Include estimated culvert sizing for each location and preliminary site-specific or standard design details for culvert installation. **Identify and describe expected road rehabilitation/culvert protection/etc. activities as indicated in the initial deficiency response.**	The previously-identified road inventory will no longer be necessary; SCE's TROW program will be performing regularly scheduled maintenance along the access roads in 2022 (and subsequent years as necessary), and the CSP Project will utilize the access roads "as is" at the start of construction. In areas where the roadways are narrow or winding, helicopter construction has been identified.
Section 3.5.4.4	3-23	**Tree Trimming Removal** Provide an assessment of the trees to be removed or trimmed for the proposed project, including the species, specific locations, approximate number, and size. **Provide the tree assessment survey as indicated in the initial deficiency response.**	Tree assessment survey will be available in Q4 2022.
Section 3.5.15.1 and Appendix H	3-28	**Fire Prevention and Emergency Response Plan** Provide a draft Construction Fire Prevention and Emergency Response Plan specifically prepared for proposed project construction as specified in the CPUC PEA Checklist. The template provided in PEA Appendix H is only a generic plan template and does not meet this requirement. Project specific information should include: ▪ Purpose and applicability of plan ▪ Responsibilities and duties ▪ Project areas where the plan applies ▪ Procedures for times of elevated fire danger ▪ Procedures for work restrictions	Construction Fire Prevention and Emergency Management Plan provided under separate electronic cover.

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		▪ Procedures for fire reporting, response, prevention and evacuation routes. ▪ Coordination with govt officials ▪ Crew training (including fire safety practices and restrictions) ▪ Fire suppression and communication equipment to be on-hand during construction ▪ Post-construction fire prevention and response measures In addition, both the PEA and the Construction Fire Prevention and Emergency Response Plan should identify any fire breaks (i.e., vegetation clearance) requirements around specific project activities (i.e., hot work) and should confirm that that such clearance buffers are included in the limits of the defined work areas (or expand the defined work areas, as necessary), and indicate that the vegetation removal in that area is attributed to fire prevention and response. **Provide the draft Construction Fire Prevention and Emergency Response Plan as indicated in the initial deficiency response. Make sure that the Plan addresses the items described above.**	
Section 3.7.3.2	3-30	**Habitat Restoration and Invasive Plant Management Plans** Provide both a draft Habitat Restoration and Revegetation Plan and an Invasive Plant Management Plan at this time. The proposed project alignment supports sensitive habitats and special-status species, and restoration in both dry arid desert and alpine environments can be complicated, requiring several years to decades to restore pre-existing conditions. The CPUC needs to review these draft plans now in order to ensure that biological resource impacts can be adequately reduced to less than significant levels. **Provide the draft Habitat Restoration and Revegetation Plan as indicated in the initial deficiency response.**	Draft HRP will be provided in Q4.
Section 3.7.3.2.1	3-30	**Restoring Natural Drainage Patterns** Identify how pre-project contours will be determined and documented prior to project-related ground disturbance. **Provide the draft Habitat Restoration and Revegetation Plan and draft Invasive Plant Management Plan as indicated in the initial deficiency response. Make sure that the Plan addresses the items described above.**	Draft HRP and IPMP will be provided in Q4.
Chapter 5: Environmental Analysis			
5.1 Aesthetics (AES)			
Figure set 5.4-1	AES-8	**Habitat Designations** Vegetation alliances and associations for identified construction staging areas are not indicated, the disturbance of which may create long-term visual impacts. These designations may require Habitat Restoration and Revegetation Plans (APM BIO-RES-1) that may (with visual design criteria included) mitigate long-term visual impacts. Update Figure set 5.4-1 to identify these species. **Provide staging area survey results as indicated in the initial deficiency response. Make sure that the Plan addresses the items described above.**	GIS data provided under separate cover.
Figure set 5.4-2	AES-9	**Rare Plant Designations** Rare plant species for identified construction staging areas are not indicated, the disturbance of which may require Habitat Restoration and Revegetation Plans (APM BIO-RES-1) that may (with visual design criteria included) mitigate long-term visual impacts. Update Figure set 5.4-2 to identify these species. **Provide staging area survey results as indicated in the initial deficiency response. Make sure that the Plan addresses the items described above.**	GIS data provided under separate cover.

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Section 5.4.4.1.2.1 Table 5.4-8	AES-10	**Revegetation Timeline** Provide an estimate for the length of time it would take for the various Vegetation Alliances to revegetate through natural succession or with APM BIO-RES-1 to essentially match existing conditions. **Provide the draft Habitat Restoration and Revegetation Plan as indicated in the initial deficiency response. Make sure that the Plan addresses the item described above.**	Draft HRP will be provided in Q4.
5.2 Agriculture and Forestry Resources (AFR)			
Section 5.2.4.1.4.2	AFR-1	**Forestland Impacts** This section states that the two-pole lines in Segment 3 “located on forestland” are to be replaced with single-pole lines which will allow some ground to “become forest land over time” and reduce the amount of future clearing and pruning required. Provide the following to support the “no impact” conclusion: • How many acres would be abandoned? How do they count against the 112 acres of impacted forest? • What if non-tree vegetation (shrub/grass/invasives) occupies these abandoned areas making reforestation less likely or more difficult? • Provide a site-specific restoration plan for these areas? What is the desired future condition? See also Deficiency #PD 3-24. • Will roads/trails and other associated soil disturbances and cut pole bases in the abandoned alignments be treated or re-contoured for visual and erosion control reasons? **Quantify the estimated acreage of reduced future clearing and pruning. Provide associated GIS shapefiles. Any treatment of abandoned areas also needs to be addressed in the Habitat Restoration and Revegetation Plan as appropriate.**	Approximately 4.2 acres would be abandoned; this is calculated by assuming that a 15-foot radius cleared area around each existing pole identified for removal would be returned to “forestland”. Approximately 1.5 acres of “forestland” would remain permanently cleared; this is calculated by assuming that a 15-foot radius cleared area around each new pole would be cleared. The restoration of these abandoned areas will be addressed in the HRP, and control of invasives will be addressed in the IPMP. Note that “forestland” as defined in California PRC Section 12220(g) does not preclude the presence of shrubs, grasses, etc. An HRP will be developed for the CSP Project. No spur roads or other overland means of accessing the CSP Project alignment are anticipated to be abandoned, as these spur roads or other overland means of accessing the CSP Project alignment will continue to be used during operations and maintenance of the lines.
5.4 Biological Resources (BIO)			
Section 5.4.1.2	BIO-1	**Temporary and Permanent Project Impacts** The CPUC PEA Checklist states that “All temporary and permanent project areas must be within the survey area.” The survey area described in Section 5.4.1.2 does not include all work areas, such as contractor material yards. The SCE response to this issue in Pre-filing letter #5 stated “Areas that have not yet been surveyed (including access roads located outside of the survey area that will be subject to rehabilitation as described in the PEA), as well as areas that may be identified later, will be subject to pre-construction surveys per APM BIO-GEN-1, Pre-construction Biological Clearance Surveys and Monitoring.” The aforementioned response does not meet the requirements of the CPUC PEA Checklist. Provide a revised survey that includes all potential temporary and permanent project impact areas. **Provide updated survey results as indicated in the initial deficiency response. Provide associated GIS shapefiles. Make sure that the survey addresses the items described above.**	GIS data provided under separate cover.
Section 5.4.4.1.2.1	BIO-16	**Vegetation Mapping** Mapped vegetation on Figure 5.4-1 does not include all work areas, such as contractor material yards, which were provided in GIS data with the PEA. Since vegetation in these areas was not mapped, it does not appear that impacts within these areas were quantified in table 5.4-8. It is also possible that additional sensitive natural communities are present within work areas where vegetation has	Updated shapefiles provided under separate cover.

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		not been mapped. Therefore, the discussion of impacts to sensitive natural communities is not complete. Revise the analysis to include all work areas. **Provide updated survey results as indicated in the initial deficiency response. Provide associated GIS shapefiles. Make sure that the survey addresses the items described above.**	
5.9 Hazards and Hazardous Materials (HAZ)			
Section 5.9.1.1 Table 5.9-1	HAZ-4	**Hazardous Materials and Waste Sites** Pre-filing comment HAZ-3 requested that SCE provide any records, personal communications, maps, and any other information obtained regarding the facilities listed in Table 5.9-1. The response to previous comment HAZ-3 indicated that printouts of results from public database queries are included in Appendix F, Environmental Data Resources Report. The printouts in Appendix F include only basic and minimal information regarding these sites (e.g., screen shots of the GeoTracker and EnviroStor summary pages and lists of available documents). Appendix F does not include copies of any figures or documents that would provide the information necessary to determine whether the facilities listed in Table 5.9-1 have released hazardous materials within or immediately adjacent to the CSP Project alignment. Appendix F of the PEA should be revised to include copies of the figures/documents that were reviewed which provide the basis for stating that hazardous materials associate with these facilities are not present within or immediately adjacent to the CSP Project alignment. Alternatively, this information could be presented in a Phase I ESA or similar report that should be prepared as discussed in pre-filing comment HAZ-3 above. **Provide information requested in the deficiency description above. Because no figures/maps or explanation regarding the boundaries of the hazardous materials release sites was provided, it is not clear whether the project alignment may actually intersect or be adjacent to any of the release sites, or if it is only the map marker point for the release site that does not fall within the project alignment. One of the sites identified in Appendix F of the PEA (Bishop Mill/CMC Metals) is located adjacent to the project alignment. Hazardous materials releases have the potential to impact surrounding properties due to migration of contamination in groundwater or stormwater runoff. While a full Phase I ESA may not be necessary for the project, further discussion of the known hazardous materials release sites and past land uses that may have resulted in contamination of the project alignment is necessary.**	The records provided in the Appendix contain links to supporting material. Among these links are maps and data that explain the "boundaries of the hazardous materials release sites" and that "provide the information necessary to determine whether the facilities listed in Table 5.9-1 have released hazardous materials within or immediately adjacent to the CSP Project alignment". The provision of this supporting material in the Appendix is unnecessary, as the supporting material can be accessed electronically through the provided links. Regarding the Bishop Mill/CMC Metals site: While this site is located adjacent to the CSP Project alignment in Segment 4, it is located more than 3,000' from the nearest location where work under the CSP Project would occur. Groundwater levels at the Bishop Mill/CMC Metals site exceed 30 feet; groundwater levels at the nearest location where work under the CSP Project would occur are unknown, but a well in the vicinity (WCR2020-004381, which is closer to the work location than is the Bishop Mill/CMC Metals site) reports a groundwater level of 90'. The CSP Project-related work will entail the removal of an existing pole (height: 52') and installation of a replacement pole (height: 66'). Using the standard burial depth rule of thumb of "10%+2 feet", we can safely presume that the pole to be removed has a burial depth of less than 8 feet, and the pole to be installed would have a burial depth of less than 9'. Therefore, the scope of work along this portion of the alignment is very unlikely to encounter groundwater (potentially contaminated or not), and thus regardless of any migration of contaminants from the Bishop Mill/CMC Metals site in groundwater, such groundwater contaminants would not be encountered. Regarding the Laws Bulk Plant site: This site is not located adjacent to the CSP Project alignment; the nearest monitoring well installed as part of the remedial action is located more than 400 feet from the CSP Project alignment, and the remedial location is more than 1,000 feet from the CSP Project alignment. The remedial action is groundwater-focused. Groundwater in monitoring wells exceeds 10 feet. Along this portion of the alignment, existing poles will be removed; no new poles will be installed. The existing poles along this portion of the alignment are approximately 46 feet in height. Using the standard burial depth rule of thumb of "10%+2 feet", we can safely presume that all poles in this area have a burial depth of less than 7 feet. Therefore, the scope of work along this portion of the alignment is very unlikely to encounter groundwater (potentially contaminated or not), and thus regardless of any migration of contaminants in groundwater, such groundwater contaminants would not be encountered. Further, as found in https://documents.geotracker.waterboards.ca.gov/regulators/deliverable_documents/7055945158/60%20DayNotice_LawsBulk.pdf, Lahontan Water Board staff have "evaluated the data collected from this site and has determined the historical release of petroleum products poses a low threat to human health, safety, and the environment. Therefore, staff considers it appropriate to issue a No Further Action Required letter for this site." Following the required public comment period, the case was closed as of 29 April 2021.

<table>
<tr><th>PEA Deficiencies
Section or Page #</th><th>Comment Code</th><th>Deficiency</th><th>Response/Modified Text</th></tr>
<tr><td></td><td></td><td></td><td>Regarding the Johannsen Reduction Plant: There is no information regarding any contaminants (or lack thereof) at this site.</td></tr>
<tr><td colspan="4">5.10 Hydrology and Water Quality (HWQ)</td></tr>
<tr><td>Section 5.10.4.1.5.1</td><td>HWQ-2</td><td>Crossing Restoration
Provide additional details related to how stream channels that would be returned to pre-project topography and grade. Identify any APMs that may address this issue.
Provide the draft Habitat Restoration and Revegetation Plan as indicated in the initial deficiency response. Make sure that the Plan addresses the item described above.</td><td>This information, if necessary given the pending SCE TROW program’s regularly scheduled maintenance along the access roads in 2022 (and subsequent years as necessary), will be presented in the HRP that will be provided under separate cover in Q4.</td></tr>
<tr><td colspan="4">5.20 Wildfire (WF)</td></tr>
<tr><td>Section 5.20.1.2</td><td>WF-2</td><td>Fire Occurrence
Identify all fires in the last 10 years in the project vicinity, not just those that overlap the Project alignment.
Provide the information requested in this deficiency.</td><td>Revised figure provided under separate cover.

Table 5.20-2: Wildfires Along the CSP Project Alignment
<table><tr><th>Name</th><th>Year</th><th>Location</th><th>Ignition Source/Location</th><th>Amount of Land Burned (Acres)</th></tr><tr><td>Pleasant</td><td>2018</td><td>Segment 3</td><td>Unknown</td><td>2,076</td></tr><tr><td>Bridges</td><td>2014</td><td>Segment 3</td><td>Campfire</td><td>113</td></tr><tr><td>~~River~~</td><td>~~2005~~</td><td>~~Segment 3~~</td><td>~~Unknown~~</td><td>~~86~~</td></tr><tr><td>~~Cashbaugh~~</td><td>~~1987~~</td><td>~~Segment 3~~</td><td>~~Unknown~~</td><td>~~600~~</td></tr></table>Source: California Department of Forestry and Fire Protection</td></tr>
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PEA Deficiencies Section or Page #	Comment Code	Deficiency	Response/Modified Text
Section 5.20.1.5	WF-6	**Evacuation Routes** The PEA notes that U.S. 395 and U.S. 6 are identified as primary evacuation routes, but it does not indicate by whom; this omission should be corrected. Additionally, provide information on any adopted evacuation plans or emergency response plans. **Describe the evacuation plans and state how the project activities would not interfere with the evacuation plans, or if so, how SCE would mitigate that interference. Incorporate into the needed model assessment report. See WF-7.**	***5.20.1.5 Evacuation Routes*** U.S. 395 and U.S. 6 are identified in the *Inyo County Regional Transportation Plan: 2019-2039* as primary evacuation routes that are crossed by the CSP Project alignment. There are no public roadways crossed by the CSP Project alignment that lack a secondary point of access or exit. _____ Section 5.9.4.1.6 explains why the CSP Project would not interfere with the use of evacuation routes. 5.20.4.1.1 Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan? 5.20.4.1.1.1 Construction Less than Significant Impact. The CSP Project would not substantially impair execution of either the Inyo County Emergency Operations Plan: 2016 or the Mono County Emergency Operations Plan. As discussed in Section 5.17, the CSP Project would not be expected to significantly impact traffic circulation or increase demands on existing emergency response services during temporary construction activities, and would not significantly impact emergency access in the area or increase the demand for existing emergency response services. Although it is not anticipated that construction activities would result in the blockage of any roadways that could be used in the case of an emergency, in the event that any construction-related activity may result in such a blockage or closure, SCE would implement APM TRA-1, which calls for coordination with local authorities including emergency responders regarding appropriate procedures. As directed in APM TRA-1, construction activities completed within public street rights-of-way would require the use of a traffic control service, and all lane closures would be conducted in accordance with APM TRA-1. Therefore, the impacts associated with construction activities would be less than significant under this criterion.
Section 5.20.4.1.3	WF-9	**Potential for Installation or Maintenance of Infrastructure That May Exacerbate Fire Risk** Analysis of the impacts of the project itself is missing and needs to be provided. The removal of vegetation and the likely replacement by alien ignitable plant species is a possibility that should be evaluated. The trimming of vegetation to allow for overland travel or to create temporary staging areas are both places where alien, flammable grasses are likely to replace existing vegetation. The trimming of vegetation on road crown, in areas of overland travel, and other locations constitute the creation of fuel breaks. The running of diesel generators constitutes an additional ignition source, as does the equipment used to cut the vegetation. Vehicles traveling over vegetation (which may have been cut and left, and then dried) adds another fire risk that can be attributed to construction. The data is available to perform a quantitative analysis and should be included here. Because the specifics of the Construction Fire Prevention Plan are not known, the impacts of wildfire cannot be determined since the safety measures would presumably reduce the occurrence and spread and damage from wildfires. But without knowing the actions to be taken, we cannot know to what extent the	Construction Fire Prevention and Emergency Management Plan provided under separate electronic cover.

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		reductions in the occurrence, spread and damage may be. See also Deficiency #3-28 above. **Don’t know where the response discussion of associated infrastructure is coming from. This deficiency focuses on project construction and maintenance activities. Provide the draft Construction Fire Prevention and Emergency Response Plan as indicated in the deficiency 3-28 above. Make sure that the Plan addresses the items described herein as well.**	