

March 16, 2022

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

Re: SCE's Responses to 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 Project PEA Deficiency Batch #3 SCE Responses, included in this submittal for SCE's responses to the CPUC's September 15, 2021 PEA deficiency letter. The response matrix includes responses to the deficiencies SCE and the CPUC have agreed to as long-term deficiencies. Further, SCE has identified deficiencies that request information beyond what is prescribed in the CPUC's *Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments*, and produces this information in the spirit of cooperation.

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

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| 5.1 Aesthetics (AES) | | | |
| AES-1 | Section 5.1 | <p>The PEA section does not establish a basis for impact determinations based on regulatory policies and visual/scenic resource management parameters other than the presentation of simulations. Simulations provided do not show segments within difficult terrain where landscape modifications would be more significant than those that were portrayed.</p> <p>Provide the following additional simulations:</p> <ul style="list-style-type: none"> ▪ Transmission line and access routes along the upper reaches of Silver Canyon Road and Wyman Creek Road ▪ Construction staging areas (immediately or 5 years after construction) identified at the intersection of White Mountain Road (Ancient Bristlecone Scenic Byway) with Silver Canyon and Wyman Canyon Roads ▪ Along the hill and drainages through which SR 168 winds east of Wyman Canyon. See also Deficiency #AES-2. <p>It is recommended that SCE engage the BLM and USFS as well to ensure that there aren't other locations where simulations are required.</p> | <p>The CPUC has communicated to SCE that AES-1 will be addressed through a data request, rather than as a discrepancy. No response necessary at this time.</p> |
| AES-3 | Section 5.1.4.1.3.1 | <p>Degrade Visual Character during Construction</p> <p>The impact analysis focuses on equipment presence and construction activities. The analysis does not address the short- to long-term visual impacts of landscapemodifications related to the construction staging and laydown areas. The statement that "In general, the visual effects of vegetation removal will be minorand not noticeable to the public and the impact would be less than significant" is related to tree removal or trimming and cannot be supported. Provide additional analysis to support this conclusion.</p> <p>As an example, the areas identified for construction staging at the three corners of the intersection of White Mountain Road (Ancient Bristlecone Scenic Byway), Silver Canyon Road, and White Mountain Road have a cumulative total of 14.7 acres. Figure 5.1-2i, Photo 17 illustrates the character of the area. These lands have a USFS Recreation Opportunity Spectrum designation in the summertime as"roaded natural" where visitor expectations assume that the vegetated landscape would be natural in appearance. These undisturbed lands would be modified with temporary perimeter fencing, grubbing, grading, and spreading ofa rock base for the duration of the construction period. The perimeter form of these areas has tentatively been identified as rectilinear and angled enclosures. How will the USFS "High" Scenic Integrity Objective for the area be met? What mitigation is appropriate? No APMs are proposed. Consider developing an additional APM to meet this objective.</p> <p>The visual analysis indicates that restoration and/or revegetation of the construction staging and laydown areas will occur "if" they are within sensitive habitats. Habitat restoration and/or revegetation plan(s) would be developed by SCE with the appropriate resource agencies and implemented after construction is complete (reference BIO-RES-1: Habitat Restoration ManagementPlan). Visual impacts alone should be sufficient to trigger the need for site restoration and revegetation plans.</p> | <p>Construction staging and laydown areas are preferentially sited on existing fully- or partially-disturbed areas; because of this, the trimming or removal of trees associated with the establishment of staging and laydown areas will be minimal. The careful siting of such areas supports the conclusion that impacts during construction would be less than significant.</p> <p>As presented in Section 3.7.3.2 of the PEA document, areas temporarily disturbed during construction would be restored or revegetated as described in the project's HRRP and as guided by the conditions attached to project approvals from federal and state regulators. Such restoration and/or revegetation activities would minimize or eliminate the long-term visual effects of vegetation removal.</p> <p>Further, we have had recent discussion with both the USFS and BLM regarding proposed construction laydown areas at White Mountain Pass, above 9,000 ft. SCE will work with the Forest Botanist to identify construction staging areas that will minimize impacts to sage brush habitat, but that have not been identified at this time due to limitations on seasonal access.</p> |
| AES-4 | Section 5.1.4.4.2 | <p>Description of Visual Change</p> <p>The description of visual change references only the transmission line poles and circuits. No analysis is made of any access route improvements up to 18 feet wide necessary for construction equipment, especially along Silver Canyon Roadand Wyman Creek Road that includes numerous stream crossings and construction of staging and laydown areas.</p> | <p>The CPUC has communicated to SCE that AES-4 will be addressed through a data request, rather than as a discrepancy. No response necessary at this time.</p> |

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| | | <p>The analysis, as stated, is qualitative, based primarily on the presentation of simulations and is predominantly related to the transmission line poles and circuits. While referencing BLM and USFS visual management goals, the impact assessment does not clearly link the conclusions reached in any depth or method to either the BLM VRM goals or impacts to scenic quality, special areas, viewer sensitivity, and distance zones or the USFS VMS goals or impacts to landscape visibility, existing scenic integrity, or scenic attractiveness.</p> <p>Revise the analysis so that it clearly links to the aforementioned BLM and USFS goals for both transmission line poles and circuits as well as access route improvements.</p> | |
| AES-5 | Section 5.1.4.4.2 Table 5.1.6 | <p>Summary of Visual Effects at Key Viewpoints</p> <p>In the Visual Change and Effect column, include: any changes from clearing and improvements for the 15- to 25-foot-wide access road (Section 3.5.1.1.1) necessary for construction or operations of the transmission line; changes in vegetation in terms of short- to long-term visual impacts of landscape modifications related to the construction staging and laydown areas recognizing that the length of the visual impacts caused by ground vegetation removal, soil compaction, gravel removal, and species used in revegetation will vary based on elevation.</p> <p>Assume that long-term visual impacts to landscape modifications, particularly in terms of vegetation recovery or habitat restoration plans, are those that would be evident after five years from construction.</p> | The CPUC has communicated to SCE that AES-5 will be addressed through a data request, rather than as a discrepancy. No response necessary at this time. |
| AES-6 | Sections 5.1.4.4.3 and 5.1.4.4.4 Figure 5.1- 4a through Figure 5.1- 8b | <p>Simulations</p> <p>Clarify whether there will be long-term construction impacts to the landscape in terms of vegetative removal around the base of the poles and construction access or spur roads leading to them.</p> | <p>As presented in Tables 3.5-3 and 3.5-4, a permanent impact is associated with each pole or structure installed under the CSP Project. This permanent disturbance represents, as discussed in Section 3.5.4.3, the area in which vegetation will be permanently-cleared.</p> <p>There will be no long-term impact to the landscape related to spur roads, as no new permanent spur roads are included under the CSP Project, and temporary spur roads would be revegetated and/or restored.</p> |
| AES-7 | Section 5.1.4.4.4.1 Figure 5.1- 6b | <p>Visual Simulation: Silver Canyon Road at Inyo National Forest (VP 11)</p> <p>The simulation shows poles replacing the existing wood poles that were closest to the roadway edge (south set of the existing paired poles). Traveling east up Silver Canyon Road, the road and topography narrow and the south set of poles is often perched on or near the riparian zone or on a steep hillside. Provide additional simulations to properly depict the construction impacts to the landscape.</p> | The CPUC has communicated to SCE that visual simulation-related comments will be addressed through a data request, rather than as a discrepancy. No response necessary at this time. |
| 5.2 Agriculture and Forestry Resources (AFR) | | | |
| AFR-1 | Section 5.2.4.1.4.2 | <p>Forestland Impacts</p> <p>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.</p> <p>Provide the following to support the “no impact” conclusion:</p> <ul style="list-style-type: none"> ▪ 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 | <p>SCE assumes that regulatory agencies will not be providing SCE disturbance ‘credit’ for those areas currently impacted by the presence of its infrastructure that will, under the CSP Project, be removed in its entirety. Therefore, SCE has not performed any calculations to determine the acreage of disturbance that would be ‘abandoned’. If it is the intent of the regulatory agencies to indeed provide disturbance ‘credit’ to SCE that can be used to reduce any restoration mitigation ratio, SCE will determine the acres to be ‘abandoned’.</p> <p>The 112 acres of impacts to forestland (not necessarily forest) is a hypothetical maximum developed for CEQA purposes. As stated above, no calculation of the acres to be ‘abandoned’ has been made, so these acres have not been used to</p> |

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| | | be treated or re-contoured for visual and erosion control reasons? | <p>“count against” the potential disturbance.</p> <p>Restoration-related issues will be addressed in a project-specific Habitat Restoration and Revegetation Plan.</p> | | | | | | |
| 5.3 Air Quality (AQ) | | | | | | | | | |
| 5.4 Biological Resources (BIO) | | | | | | | | | |
| BIO-4 | Sections 5.4.1.5.2.4 and 5.4.1.7.2 | <p>Greater sage grouse</p> <p>Greater sage grouse is not adequately discussed. It is listed in Table 5.4-7 Special- status Wildlife species not observed within the CSP Project alignment. CDFW has provided hundreds of locational data of greater sage grouse adjacent to the project and records of leks within 2 miles of the alignment. Figure 5.4-7 shows known brood locations on both north and south of the alignment citing a USFWS publication from 2013.</p> <p>Brood locations have been located both north and south of the CSP Project Alignment and the CDFW data base includes several observations of juvenile Greater sage grouse within 500 meters of the project alignment including one less than 50 meters from the project alignment; therefore, this species may nest within the alignment.</p> <p>Provide a more robust discussion of greater sage grouse.</p> | <p>5.4.1.5.2.4 Birds</p> <p>Nine Ten special-status bird species were observed along the CSP Project alignment during 2017-2018 wildlife surveys.</p> <p>...</p> <p><u>The greater sage-grouse is a CDFW Species of Special Concern and a USFS and BLM Sensitive species. The Bi-State Distinct Population Segment (DPS), which encompasses most of Mono County and portions of Inyo and Alpine counties in California, as well as portions of Carson City, Lyon, Mineral, Esmeralda, and Douglas Counties in Nevada, was previously proposed for federal listing, but USFWS determined that federal listing was not warranted due to habitat conservation efforts (USFWS 2019b). The range of the Bi-State DPS of greater sage-grouse extended as far south as Big Pine in 1944 and includes the White Mountains of northern Inyo County, where the elevation range extends from 3,500 to 12,000 feet amsl (Shuford et al. 2008). Of these, 278 were reported within 1,640 feet (500 meters) of the CSP Project alignment, including 5 adults and 273 juveniles, with two juveniles within 164 feet (50 meters) of the CSP Project alignment.</u></p> <p><u>The greater-sage grouse usually nests in dense stands of big sagebrush, as well as rubber rabbitbrush, black greasewood, and grassy areas. They place their nests on the ground, and adult hens lead their chicks to foraging areas (Cornell 2019). The nearest lek in this dataset was reported near Bucks Peak 3 miles north of the CSP Project alignment; no leks were reported within 3 miles to the south of the CSP Project alignment. The greater sage-grouse is likely to occur within the CSP Project alignment, and the presence of juvenile and yearling sage-grouse within 164 feet of the alignment suggests the potential for breeding nearby.</u></p> | | | | | | |
| BIO-6 | Table 5.4-7 | <p>Special-status Wildlife Species Not Observed within the CSP Project Alignment</p> <p>Update Table 5.4-7 to acknowledge the following observations:</p> <p>Greater sage grouse – CDFW has provided hundreds of locational data of greater sage grouse adjacent to the project and records of leks within 2 miles of the project alignment. Figure 5.4-7 shows known brood locations on both north and south of the project alignment citing a USFWS publication from 2013.</p> <p>Brood locations have been located both north and south of the CSP Project Alignment and the CDFW data base includes several observations of juvenile Greater sage grouse within 500 meters of the alignment including one less than 50 meters from the project alignment. It is therefore impossible to rule out nesting of this species within the project alignment.</p> | <table border="1"> <tr> <td data-bbox="1662 1417 1802 1814"><i>Centrocercus urophasianus</i></td> <td data-bbox="1802 1417 1889 1814">greater sage-grouse</td> <td data-bbox="1889 1417 1992 1814">- / CSC / BLM S, USFS S</td> <td data-bbox="1992 1417 2166 1814">Potentially suitable habitat is present within the alignment primarily where Big Sagebrush Scrub or Rabbitbrush Scrub is present in Silver and Wyman Canyons and to a lesser extent where these vegetation communities,</td> <td data-bbox="2166 1417 2340 1814">The greater sage-grouse is unlikely to occur within the CSP Project alignment based on the absence of CNDDDB records in the CSP Project vicinity and the limited number of eBird sightings in the vicinity of the alignment¹.</td> <td data-bbox="2340 1417 2592 1814">The nearest CNDDDB¹ occurrences are from Mono County and are all more than 20 miles north of the CSP Project alignment. <u>The greater sage-grouse is likely to occur within the CSP Project alignment, and the presence of juvenile and yearling sage-grouse within 164 feet of the alignment suggests the</u></td> </tr> </table> | <i>Centrocercus urophasianus</i> | greater sage-grouse | - / CSC / BLM S, USFS S | Potentially suitable habitat is present within the alignment primarily where Big Sagebrush Scrub or Rabbitbrush Scrub is present in Silver and Wyman Canyons and to a lesser extent where these vegetation communities, | The greater sage-grouse is unlikely to occur within the CSP Project alignment based on the absence of CNDDDB records in the CSP Project vicinity and the limited number of eBird sightings in the vicinity of the alignment¹. | The nearest CNDDDB¹ occurrences are from Mono County and are all more than 20 miles north of the CSP Project alignment. <u>The greater sage-grouse is likely to occur within the CSP Project alignment, and the presence of juvenile and yearling sage-grouse within 164 feet of the alignment suggests the</u> |
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| | | | | | | <p>including Greasewood Scrub, occur west and north of Bishop within the alignment.</p> <p>There are no nesting records within the CSP Project alignment.</p> <p><u>More than 16,000 greater sage-grouse observations reported in the White Mountains between 2016 and 2019, primarily at the crest of the White Mountains and in Wyman Canyon in the vicinity of the CSP Project alignment (CDFW unpublished data). Of these, 278 were reported within 1,640 feet (500 meters) of the CSP Project alignment, including 5 adults and 273 juveniles, with two juveniles within 164 feet (50 meters) of the CSP Project alignment. The nearest lek in this dataset was reported near Bucks Peak 3 miles north of the CSP Project alignment; no leks were reported within 3 miles to the south of the CSP</u></p> | <p><u>potential for breeding nearby.</u></p> |

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| | | | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;"></td> <td style="width: 25%;"></td> <td style="width: 25%;"></td> <td style="width: 25%;"><u>Project alignment.</u></td> </tr> </table> | | | | <u>Project alignment.</u> |
| | | | <u>Project alignment.</u> | | | | |
| BIO-7 | Section 5.4.1.5.2.5 | <p>Desert Bighorn Sheep</p> <p>The discussion of desert bighorn sheep occurrence in the CSP Project alignment vicinity is incomplete. CDFW has provided locational data of many sightings within Silver Canyon including observations on lambing in the project vicinity and observations of adults leaning against the existing poles.</p> <p>While APM BIO-MAM-1 appears to adequately mitigate for potential impacts to desert bighorn sheep, the description of their potential for occurrence here is incomplete.</p> | <p>5.4.1.5.2.5 Mammals</p> <p>Desert bighorn sheep, a CDFW Fully Protected species, and their tracks were observed along the CSP Project alignment in two locations in Silver Canyon in Segment 3 near Silver Canyon Creek in July 2018; one observation of five adult desert bighorn sheep and one juvenile occurred near Arroyo Willow Thickets at approximately 5,500 ft amsl and the other observation of nine adult desert bighorn sheep occurred near Arroyo Willow Thickets at 6,500 ft amsl. One 1986 CNDDB record encompasses a large area in the White Mountains between Montgomery Creek in the north and Cottonwood Creek in the south, with concentrations of desert bighorn sheep reported near White Mountain Peak approximately 7 miles north of the alignment. Another herd was reported in 1988 approximately 2 miles south of the Deep Springs Substation south of Soldier Pass; this herd was described as “recently” extirpated in 1988. The desert bighorn sheep is likely to occur within the alignment in Silver Canyon (CNDDB 2020).</p> <p><u>Desert bighorn sheep were observed in two locations in Silver Canyon near Silver Canyon Creek in July 2018; one observation of five adult desert bighorn sheep and one juvenile occurred near Arroyo Willow Thickets at approximately 5,500 ft amsl and the other observation of nine adult desert bighorn sheep occurred near Arroyo Willow Thickets at 6,500 feet. Over 2,200 bighorn sheep observations were reported in Silver Canyon between 2016 and 2019, including 83 bighorn sheep with the CSP Project alignment survey area (CDFW unpublished data). There are also three CNDDB records for a herd in the White Mountains, another herd in the Inyo Mountains south of the Deep Springs Substation, and the third within 10 miles of the alignment in the Sylvania Range southeast of the alignment spanning the Nevada border. The desert bighorn sheep occurs and would be expected within the CSP Project alignment in Silver Canyon, especially near flowing water and at springs.</u></p> | | | | |
| BIO-12 | Section 5.4.4.1.1.1 | <p>Greater sage grouse</p> <p>There is not an adequate analysis of potential impacts to nesting greater sage grouse from project construction. Particularly from helicopters, but also from ground crews and ground disturbance. There are known leks and nests within 2 miles, and potentially closer, to the CSP Project alignment.</p> <p>APM BIO-GEN-1 (Preconstruction surveys) and APM BIO-AVI-1 (Nesting Bird Management Plan) are not adequate to mitigate for potential impacts from helicopter noise to nesting greater sage grouse.</p> <p>Provide additional details on potential impacts to nesting greater sage grouse from project construction.</p> | <p>5.4.4.1.1.1 Construction</p> <p>...</p> <p>Birds. Nine Ten special-status bird species were observed along the CSP Project alignment during the wildlife surveys.</p> <p>...</p> <p>Although not observed during the surveys, over 16,000 greater sage-grouse observations were reported in the White Mountains between 2016 and 2019, primarily at the crest of the White Mountains and in Wyman Canyon in the vicinity of the CSP Project alignment (CDFW unpublished data). Of these, 278 were reported within 1,640 feet (500 meters) of the CSP Project alignment, including 5 adults and 273 juveniles, with two juveniles within 164 feet (50 meters) of the CSP Project alignment. Suitable nesting habitat includes dense stands of big sagebrush, as well as rubber rabbitbrush, black greasewood, and grassy areas. Leks are located in clear areas such as broad ridgetops, grassy swales, dry lakebeds, and sometimes recently burned areas. They place their nests on the ground, and adult hens lead their chicks to foraging areas. The nearest</p> | | | | |

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| | | | <p>lek in this dataset was reported near Bucks Peak 3 miles north of the CSP Project alignment; no leks were reported within 3 miles to the south of the CSP Project alignment. The greater sage-grouse is likely to occur within the CSP Project alignment, and the presence of juvenile and yearling sage-grouse within 164 feet of the alignment suggests the potential for breeding nearby.</p> <p>CSP Project construction work activities may potentially impact special-status birds, their nests, and foraging habitats, but no nests of listed avian species were observed during the surveys. Potential impacts to special-status bird species <u>and their reproductive behavior</u> may result from vegetation clearing and ground disturbance within nesting habitat, as well as accidental crushing or burying of ground nests or active burrows by construction vehicles. An increase in vehicle traffic, helicopter noise at work sites as well as along helicopter flight routes, and human presence could result in an interruption of normal bird nesting behaviors or nest abandonment. CSP Project construction work activities may potentially impact the quality of foraging habitat for raptors, passerines, <u>greater sage-grouse</u>, and other special-status bird species that use habitats within the CSP Project area.</p> <p>Potential impacts to nesting and special-status bird species during construction would be temporary and intermittent in nature (lasting only as long as construction work at a given site) and would be limited in their potential geographic scope.</p> |
| BIO-13 | Section 5.4.4.1.1.1 | <p>Roosting Habitat</p> <p>Analysis states that no roosting habitat would be directly impacted. This statement is not consistent with descriptions in Appendix C.1 or APMs BIO-GEN-1 and BIO-MAM-2. Revise to describe potential impacts to roosts and implementation of these APMs. Paragraph also states that “Minimal suitable bat foraging habitat is located along the CSP Project alignment”, which is not consistent with descriptions in Appendix C.1. For example, Appendix C.1 states “There is a moderate to high potential for the Townsend’s big-eared bat species to forage within the project alignment, although observations have been infrequent.” Revise the paragraph to align with descriptions in Appendix C.1.</p> | <p>5.4.4.1.1.1 Construction</p> <p>...</p> <p>Potential nesting and foraging habitat is also present for several avian species that were not observed, including the northern goshawk (<i>Accipiter gentilis</i>), northern harrier (<i>Circus hudsonius</i>), yellow-breasted chat (<i>Icteria virens</i>), and other species protected under the MBTA and CFGC Section 3503.5.</p> <p><u>In addition, special-status bats may also occur along the CSP Project alignment. Suitable habitat for bat foraging occurs in places along the CSP Project alignment, and the area of suitable foraging habitat that would be disturbed during construction is negligible in comparison to the available habitat in the surrounding area. The only reported bat roosts within the CSP Project alignment include buildings near the Deep Springs Substation and in mines west of Gilbert Pass that overlap the alignment, as well as crevices in rocks on steep canyon walls. No potential roosting habitat for bats was observed during surveys, and no buildings, mines, or steep canyon walls would be directly impacted by work activities.</u></p> |
| BIO-14 | Section 5.4.4.1.1.1 | <p>Amphibians, Reptiles, and Mammals Impacts</p> <p>Sections 3.3.4.5.2 Foundations, 3.3.14.3 Below-Ground Telecommunication Lines, and 3.5.5.3 Telecommunications describe the temporary creation of excavated holes and trenches that pose an entrapment hazard to amphibians, reptiles, and some mammals. Revise the PEA so that this potential impact is addressed in Section 5.4.4.1.1.1. It is also recommended that an APM be added to Table 3.11- 1 that includes measures such as escape ramps, cover boards, and monitoring/ surveys to avoid and minimize the risk of entrapment and injury or death of wildlife.</p> | <p>5.4.4.1.1.1 Construction</p> <p>...</p> <p>Amphibians.</p> <p>...</p> <p><u>Potential impacts to special-status amphibian species may result from ground disturbing activities that can include vehicle or equipment strikes, individuals falling into excavation areas, and by the reduction of refugia habitats as well as accidental crushing or burying of active burrows by construction vehicles and activities.</u> To avoid potential impacts to special-status amphibian species, SCE would implement APM BIO-GEN-1: Pre-Construction Biological Clearance Survey and Monitoring and APM WEAP: Worker’s Environmental Awareness Training. These APMs contain measures, including pre-construction surveys, construction monitoring, flagging, and spill prevention and vehicle travel measures to protect special-status sensitive amphibians. <u>Further, SCE would employ typical measures to avoid entrapment include covering holes and trenches at the end of each day, installation of escape ramps, and monitoring and surveys near and in excavation areas to avoid and minimize the</u></p> |

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| | | | <p><u>risk to wildlife during construction.</u> With the implementation of these avoidance measures and APMs, impacts to special-status amphibians would be less than significant.</p> <p>...</p> <p>Reptiles.</p> <p>...</p> <p>To avoid and minimize potential impacts to reptiles from CSP Project construction activities such as native vegetation clearing and grubbing, grading, and earth-moving, SCE would implement APM BIO-GEN-1: Pre-construction Biological Clearance Survey and Monitoring, which includes pre-construction biological surveys and flagging boundaries of areas supporting native vegetation and special-status reptiles for avoidance, when feasible. SCE would also implement APM WEAP: Worker’s Environmental Awareness Training, to ensure contractor understanding and implementation of these protective measures. To reduce impacts to suitable habitat for sensitive reptile species resulting from introduction of noxious and invasive weeds, which may reduce habitat quality for sensitive reptile species, SCE would develop and implement an IPMP as described in APM BIO-RES-2: Develop Invasive Plant Management Plan. If impacts to sensitive reptile habitat cannot be avoided, SCE would implement restoration activities as described in APM BIO-RES-1: Develop Habitat Restoration and Revegetation Plan. The HRRP would include provisions to restore suitable habitat for special-status reptile species if such habitat is removed during CSP Project construction activities. The measures outlined in these APMs would serve to avoid and minimize potential impacts to the northern sagebrush lizard and Panamint alligator lizard. <u>Further, SCE would employ typical measures to avoid entrapment include covering holes and trenches at the end of each day, installation of escape ramps, and monitoring and surveys near and in excavation areas to avoid and minimize the risk to wildlife during construction.</u> With the implementation of these avoidance measures and APMs, impacts to special-status reptiles would be less than significant.</p> <p>...</p> <p>Mammals.</p> <p>...</p> <p>To generally avoid and minimize potential impacts to special-status mammal species during construction, SCE would implement APM BIO-GEN-1: Pre-construction Biological Clearance Survey and Monitoring, which includes pre-construction biological surveys and flagging boundaries of areas supporting native vegetation and special-status mammal burrows, watering holes, and other habitat for avoidance, when feasible, as well as APM WEAP: Worker’s Environmental Awareness Training, to ensure contractor understanding and implementation of these protective measures. In addition, mitigation strategies such as restoration of native habitat and forage species—which would reduce indirect impacts by restoring native habitat and reducing weed competition with important habitat and forage plant species upon which mammalian species rely—are addressed in APM BIO-RES-1: Develop Habitat Restoration and Revegetation Plan and APM BIO-RES-2: Develop Invasive Plant Management Plan. <u>Further, SCE would employ typical measures to avoid entrapment include covering holes and trenches at the end of each day, installation of escape ramps, and monitoring and surveys near and in excavation areas to avoid and minimize the risk to wildlife during construction.</u> Implementation of these APMs would serve to reduce direct and indirect</p> |

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| | | | impacts to all mammals. |
| BIO-15 | Section 5.4.4.1.1.1 | Bighorn Sheep Impacts Revise the description of potential impacts to bighorn sheep to include potential impacts to lambing, which is addressed in APM BIO-MAM-1. | 5.4.4.1.1.1 Construction ... To minimize impacts to desert bighorn sheep, SCE would implement measures contained in APM BIO-MAM-1 Bighorn Sheep (Nelson's/Desert). These measures are designed to avoid and minimize impacts to desert bighorn sheep, including performing pre-construction surveys to identify the presence of desert bighorn sheep, monitoring for sheep during construction, seasonal restrictions on work in certain areas, prescribing helicopter use and travel routes, and other measures. <u>To avoid impacts to bighorn sheep lambing areas, SCE shall avoid construction activities within one-mile of bighorn sheep lambing areas during the lambing period February 1 – May 30, and from identified water sources during the dry summer months, between May 1 – Sept 30, in specific project areas (63 FR 13135 and USFWS 2000).</u> |
| 5.5 Cultural Resources (CR) | | | |
| 5.6 Energy (EN) | | | |
| 5.7 Geology, Soils, and Paleontological Resources (GEO) | | | |
| GEO-8 | Appendix K Paleo Report Errata Sheet | Paleontological Resource References Provide references for new citations in the Errata sheet (e.g., Corsetti and Hagadorn 2003, California Academy of Sciences 2020, UCMP 2020). | California Academy of Sciences. (2020). Online records search of the California Academy of Sciences Paleontology Database, performed March 4, 2020. Corsetti, F.A. and Hagadorn, J. (2003). The Precambrian-Cambrian Transition in the Southern Great Basin, USA. The Sedimentary Record. A publication of the SEPM Society for Sedimentary Geology. Volume 1, No. 1, May 2003. Nelson, C.A., Hall, C.A., and Ernst, W.G. (1991). Geologic history of the White-Inyo Range: pp. 42–74 in Hall, C. A., ed., Natural history of the White-Inyo Range, eastern California, University of California Press, Berkeley, CA. UCMP. (2020). Online records search of the University of California Museum of Paleontology Database, performed March 4, 2020. |
| GEO-9 | Appendix K Paleo Report Errata Sheet | Paleontological Resource Records Search Results Presumably the University of California Museum of Paleontology (2020) and California Academy of Sciences (2020) citations are records search results. The records search Appendix in the current Report appears to have been redacted and is not readable. This should be corrected, and the new records search results added. Note that in order to protect sensitive resources these would typically not include locational information, so there is no reason to redact. | Revised paleo report provided. |
| 5.8 Greenhouse Gases (GHG) | | | |
| 5.9 Hazards and Hazardous Materials (HAZ) | | | |
| HAZ-4 | Section 5.9.1.1 Table 5.9-1 | 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 | Per communication from the CPUC To SCE dated 10 February 2020 (Re: Approach to Revised PEA Checklist Requirements and Pathway Forward for SCE Control-Silver Peak Project Filing), "A Phase I ESA does not need to be prepared at this |

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| | | <p>indicated that printouts of results from public database queries are included in Appendix F, Environmental Data Resources Report.</p> <p>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.</p> | <p>time; however, the results of hazardous site database searches (i.e., an Environmental Data Resources Report) should be provided as an appendix to the PEA. The CPUC and Horizon will review this information to confirm that it covers all project work areas, including staging areas, to determine if a Phase 1 ESA is necessary. If after reviewing the data report, we feel that a Phase I ESA is needed, it will be identified as a deficiency.”</p> <p>The printouts in Appendix F contain the information (i.e., physical location) necessary to identify whether the CSP Project is located on a site that is included on a list of hazardous material sites, compiled pursuant to Government Code Section 65962.5. Because no component of the CSP Project is located on a site listed pursuant to Government Code Section 65962.5, and because the nearest site was identified at a distance of 0.2 mile from the alignment, hazardous materials associated with these facilities are not present within or immediately adjacent to the CSP Project alignment.</p> |
| HAZ-8 | Section 5.9.4.1.7 | <p>Potential Expose of People or Structures to a Significant Risk of Loss, Injury or Death Involving Wildland Fires</p> <p>The PEA includes a variety of general statements but does not include any quantitative analysis of wildfire probability, spread or intensity to justify the claim that the exposure of people or structures is less than significant. Because the data is available, a quantitative spatial analysis is an industry standard for analyzing this question and is expected here.</p> <p>Vegetation would be trimmed; however, there is no mention of whether the cut material would be left to dry and remain on-site, or somehow be disposed of off-site. There is no analysis of the expected area (location and size) to be treated in this manner. The distribution of fuel models (both a table form, interpreted in text and shown on a map) are necessary risk factors that should be analyzed. There is no mention of topography in the project area, especially in relation to wildfire behavior and potential damage, which is another crucial factor that is unaddressed.</p> <p>While the PEA notes a variety of steps SCE would take as part of the project to minimize risk, fires can start even with them in place. Analysis is needed to determine the frequency and impact of wildfire even when these measures are in place.</p> <p>Similarly, the PEA states, “The Plan describes strategies, programs and activities that are in place, being implemented or are under development by SCE to proactively address and mitigate the threat of electrical infrastructure- associated ignitions that could lead to wildfires. Therefore, no impacts would be realized under this criterion during O&M”. Having a plan in place is not a justification for a less than significant impact. Instead, an analysis of the risk of loss, injury or death should be conducted using the abundant spatial data available.</p> | <p>Per CPUC direction, SCE has developed a computational fire model for the CSP Project. This model and its inputs have been provided under separate electronic cover.</p> |
| 5.10 Hydrology and Water Quality (HWQ) | | | |
| HWQ-2 | Section 5.10.4.1.5.1 | <p>Crossing Restoration</p> <p>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.</p> | <p>This topic, among others, will be addressed in the Habitat Restoration and Revegetation Plan prepared for the CSP Project.</p> <p>In addition, this topic is addressed in APM WET-1, which states in part that “If permanent impacts to waters, wetlands, and riparian habitats are unavoidable, they shall be mitigated for at a minimum of a 1:1 ratio, or at a ratio determined by the applicable Resource Agencies (i.e., U.S. Army Corps of Engineers, the State Water</p> |

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| | | | Resources Control Board/Regional Water Quality Control Boards, and California Department of Fish and Wildlife). Temporary impacts to jurisdictional waters shall be returned to pre-existing contours upon completion of the work.” |
| 5.11 Land Use (LU) | | | |
| 5.12 Mineral Resources (MR) | | | |
| 5.13 Noise (NOI) | | | |
| NOI-2 | Section 5.13.1.2 | <p>Noise Study</p> <p>The CPUC PEA Checklist states that projects should “5.13.1.2: Noise Setting. Provide the existing noise levels (Lmax, Lmin, Leq, and Ldn sound level and other applicable noise parameters) at noise sensitive areas near the proposed project. All noise measurement data and the methodology for collecting the data will be provided in a noise study as an Appendix to the PEA.”</p> <p>However, the Noise Setting in the PEA does not include any noise study or any existing noise measurement data at noise sensitive areas near the proposed project. The Noise Setting in the PEA references old noise measurements from 2014 and measurements that are not near the proposed project. Short-term noise measurements that happen to be from the same jurisdiction as the proposed project are not an appropriate substitute for existing noise measurements near the proposed project and are not appropriate baseline noise data for noise sensitive areas near the proposed project.</p> <p>The PEA needs to conduct a noise study that documents existing noise levels (Lmax, Lmin, Leq, and Ldn sound level and other applicable noise parameters) at noise sensitive areas near the proposed project. Measurements should be made at the most representative location in the various jurisdiction that are the setting for the proposed project.</p> | Ambient noise survey report provided to CPUC. |
| 5.14 Population and Housing (POP) | | | |
| 5.15 Public Service (PUB) | | | |
| 5.16 Recreation (REC) | | | |
| 5.17 Transportation (TRA) | | | |
| 5.18 Tribal Cultural Resources (TCR) | | | |
| TCR-1 | Section 5.18.1.2 | <p>Conclusionary Statement</p> <p>“EI’s background research and intensive pedestrian field survey of the APE, there are potential TCRs within the CSP Project area.” Explain how this conclusion was reached and describe the kinds of tribal cultural resources that are potentially within the project area.</p> | <p>Section 5.18.1.1 will be modified as follows:</p> <p>EI’s background research and intensive pedestrian field survey of the APE <u>as outlined in Section 5.5 suggests</u>, there are potential TCRs within the CSP Project area. However, formal consultation has not yet confirmed nor identified these resources.</p> |
| TCR-2 | Section 5.18.1.3 | <p>Ethnographic Background</p> <p>This section describes the project location, but doesn’t even mention the Paiute. The section needs to be revised, with reference to section 5.5.1.4 Ethnographic Background.</p> | Section 5.18.1.3 will be revised to reference back to 5.5.1.4, Ethnographic Background. |
| 5.19 Utilities and Service Systems (USS) | | | |
| 5.20 Wildfire (WF) | | | |
| WF-1 | Section 5.20.2.1 | Wildfire Regulatory Setting | 5.20.2.1.2 State |

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| | | <p>The regulatory setting is lacking several pertinent regulations. Revise the wildfire regulatory setting to include the following as appropriate:</p> <ul style="list-style-type: none"> ▪ California Code of Regulations (CCR) and Public Resources Code (PRC) <ul style="list-style-type: none"> ○ CCR Title 14 Section 1272 [PRC 4290 and 4291] Defensible Space and Fire Safe Development ○ CCR Title 14 Section 1254 [PRC 4292] Powerline Hazard Reduction] ○ CCR Title 14 Section 1254 [PRC 4293] Powerline Clearance Required ○ CCR Title 14 Section 1254 PRC 4294-4296.5, Powerline Clearance Exceptions ○ CCR Title 14, Section 4427 ○ CCR Title 14, Section 4428-4429 ○ CCR Title 14, Section 4431 ○ CCR Title 14, Section 4442 and 4443 ○ CCR Title 14, Forest Practice Rules Article 8, Rule #918 Fire Protection ▪ California Multi-Hazard Mitigation Plan ▪ California Department of Forestry and Fire Protection (CAL FIRE) Strategic Fire Plans, or Unit Plans ▪ Local Hazard Mitigation Plans ▪ Local Community Wildfire Protection Plans | <p>...</p> <p><u>5.20.2.1.2.3 CCR Title 14 Section 1254 [PRC 4292] Powerline Hazard Reduction]</u></p> <p><u>Except as otherwise provided in Section 4296, any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for fire protection of such areas, maintain around and adjacent to any pole or tower which supports a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner pole, a firebreak which consists of a clearing of not less than 10 feet in each direction from the outer circumference of such pole or tower. This section does not, however, apply to any line which is used exclusively as telephone, telegraph, telephone or telegraph messenger call, fire or alarm line, or other line which is classed as a communication circuit by the Public Utilities Commission. The director or the agency which has primary fire protection responsibility for the protection of such areas may permit exceptions from the requirements of this section which are based upon the specific circumstances involved.</u></p> <p><u>5.20.2.1.2.4 CCR Title 14 Section 1254 [PRC 4293] Powerline Clearance Required</u></p> <p><u>Except as otherwise provided in Sections 4294 to 4296, inclusive, any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or in forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for the fire protection of such areas, maintain a clearance of the respective distances which are specified in this section in all directions between all vegetation and all conductors which are carrying electric current:</u></p> <p><u>(a) For any line which is operating at 2,400 or more volts, but less than 72,000 volts, four feet.</u></p> <p><u>(b) For any line which is operating at 72,000 or more volts, but less than 110,000 volts, six feet.</u></p> <p><u>(c) For any line which is operating at 110,000 or more volts, 10 feet.</u></p> <p><u>In every case, such distance shall be sufficiently great to furnish the required clearance at any position of the wire, or conductor when the adjacent air temperature is 120 degrees Fahrenheit, or less. Dead trees, old decadent or rotten trees, trees weakened by decay or disease and trees or portions thereof that are leaning toward the line which may contact the line from the side or may fall on the line shall be felled, cut, or trimmed so as to remove such hazard. The director or the agency which has primary responsibility for the fire protection of such areas may permit exceptions from the requirements of this section which are based upon the specific circumstances involved.</u></p> |

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| | | | <p><u>5.20.2.1.2.5 CCR Title 14 Section 1254 PRC 4294-4296.5, Powerline Clearance Exceptions</u></p> <p><u>4294. A clearing to obtain line clearance is not required if self-supporting aerial cable is used. Forked trees, leaning trees, and any other growth which may fall across the line and break it shall, however, be removed.</u></p> <p><u>4295. A person is not required by Section 4292 or 4293 to maintain any clearing on any land if such person does not have the legal right to maintain such clearing, nor do such sections require any person to enter upon or to damage property which is owned by any other person without the consent of the owner of the property.</u></p> <p><u>4295.5. (a) Notwithstanding any other law, including Section 4295, a person who owns, controls, operates, or maintains an electrical transmission or distribution line may traverse land as necessary, regardless of land ownership or express permission to traverse land from the landowner, after providing notice and an opportunity to be heard to the landowner, to prune trees to maintain clearances pursuant to Section 4293, and to abate, by pruning or removal, any hazardous, dead, rotten, diseased, or structurally defective live trees. The clearances obtained when the pruning is performed shall be at the full discretion of the person that owns, controls, operates, or maintains any electrical transmission or distribution line, but shall be no less than what is required in Section 4293. This section shall apply to both high fire threat districts, as determined by the California Public Utilities Commission pursuant to its rulemaking authority, and to state responsibility areas.</u></p> <p><u>(b) Subdivision (a) does not exempt a person who owns, controls, operates, or maintains an electrical transmission or distribution line from liability for damages for the removal of vegetation that is not covered by an easement granted to the person for the electrical transmission or distribution line.</u></p> <p><u>4296.5.</u></p> <p><u>(a) Any person or corporation operating a railroad on forest, brush, or grass-covered land shall, if ordered by the director or the agency having primary responsibility for fire protection of the area, destroy, remove, or modify so as not to be flammable any vegetation or other flammable material defined by regulation of the director to be a fire hazard on the railroad right-of-way. The director shall adopt regulations establishing fire prevention hazard reduction standards for broad geographic areas by fuel type, slope, and potential for ignition from hot or flaming exhaust, carbon particles, hot metal, burning signal devices, burning tobacco, and other similar potential sources of ignition.</u></p> <p><u>(b) The order to destroy, remove, or modify vegetation or other flammable material shall specify the location of the hazard to be destroyed, removed, or modified within the right-of-way, the width of the hazard which shall not exceed the width of the right-of-way, and the time within which compliance with the order is required.</u></p> <p><u>(c) The director or the agency having primary responsibility for fire protection of the area shall allow a reasonable period of time for compliance with an order to destroy, remove, or modify vegetation or other flammable material.</u></p> |

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| | | | <p><u>5.20.2.1.2.6 CCR Title 14, Section 4427</u> <u>During any time of the year when burning permits are required in an area pursuant to this article, no person shall use or operate any motor, engine, boiler, stationary equipment, welding equipment, cutting torches, tarpots, or grinding devices from which a spark, fire, or flame may originate, which is located on or near any forest-covered land, brush-covered land, or grass-covered land, without doing both of the following:</u></p> <p><u>(a) First clearing away all flammable material, including snags, from the area around such operation for a distance of 10 feet.</u></p> <p><u>(b) Maintain one serviceable round point shovel with an overall length of not less than forty-six (46) inches and one backpack pump water-type fire extinguisher fully equipped and ready for use at the immediate area during the operation.</u></p> <p><u>This section does not apply to portable powersaws and other portable tools powered by a gasoline-fueled internal combustion engine.</u></p> <p><u>5.20.2.1.2.7 CCR Title 14, Section 4428</u> <u>No person, except any member of an emergency crew or except the driver or owner of any service vehicle owned or operated by or for, or operated under contract with, a publicly or privately owned utility, which is used in the construction, operation, removal, or repair of the property or facilities of such utility when engaged in emergency operations, shall use or operate any vehicle, machine, tool or equipment powered by an internal combustion engine operated on hydrocarbon fuels, in any industrial operation located on or near any forest, brush, or grass-covered land between April 1 and December 1 of any year, or at any other time when ground litter and vegetation will sustain combustion permitting the spread of fire, without providing and maintaining, for firefighting purposes only, suitable and serviceable tools in the amounts, manner and location prescribed in this section.</u></p> <p><u>(a) On any such operation a sealed box of tools shall be located, within the operating area, at a point accessible in the event of fire. This fire toolbox shall contain: one backpack pump-type fire extinguisher filled with water, two axes, two McLeod fire tools, and a sufficient number of shovels so that each employee at the operation can be equipped to fight fire.</u></p> <p><u>(b) One or more serviceable chainsaws of three and one-half or more horsepower with a cutting bar 20 inches in length or longer shall be immediately available within the operating area, or, in the alternative, a full set of timber-felling tools shall be located in the fire toolbox, including one crosscut falling saw six feet in length, one double-bit ax with a 36-inch handle, one sledge hammer or maul with a head weight of six, or more, pounds and handle length of 32 inches, or more, and not less than two falling wedges.</u></p> <p><u>(c) Each rail speeder and passenger vehicle, used on such operation shall be equipped with one shovel and one ax, and any other vehicle used on the operation shall be equipped with one shovel. Each tractor used in such operation shall be equipped with one shovel.</u></p> |

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| | | | <p><u>(d) As used in this section:</u></p> <p><u>(1) "Vehicle" means a device by which any person or property may be propelled, moved, or drawn over any land surface, excepting a device moved by human power or used exclusively upon stationary rails or tracks.</u></p> <p><u>(2) "Passenger vehicle" means a vehicle which is self-propelled and which is designed for carrying not more than 10 persons including the driver, and which is used or maintained for the transportation of persons, but does not include any motortruck or truck tractor.</u></p> <p><u>5.20.2.1.2.8 CCR Title 14, Section 4431</u></p> <p><u>During any time of the year when burning permits are required in an area pursuant to this article, no person shall use or operate or cause to be operated in the area any portable saw, auger, drill, tamper, or other portable tool powered by a gasoline-fueled internal combustion engine on or near any forest-covered land, brush-covered land, or grass-covered land, within 25 feet of any flammable material, without providing and maintaining at the immediate locations of use or operation of the saw or tool, for firefighting purposes one serviceable round point shovel, with an overall length of not less than 46 inches, or one serviceable fire extinguisher. The Director of Forestry and Fire Protection shall by administrative regulation specify the type and size of fire extinguisher necessary to provide at least minimum assurance of controlling fire caused by use of portable power tools under various climatic and fuel conditions.</u></p> <p><u>The required fire tools shall at no time be farther from the point of operation of the power saw or tool than 25 feet with unrestricted access for the operator from the point of operation.</u></p> <p><u>5.20.2.1.2.9 CCR Title 14, Section 4442</u></p> <p><u>(a) Except as otherwise provided in this section, no person shall use, operate, or allow to be used or operated, any internal combustion engine which uses hydrocarbon fuels on any forest-covered land, brush-covered land, or grass-covered land unless the engine is equipped with a spark arrester, as defined in subdivision (c), maintained in effective working order or the engine is constructed, equipped, and maintained for the prevention of fire pursuant to Section 4443 .</u></p> <p><u>(b) Spark arresters affixed to the exhaust system of engines or vehicles subject to this section shall not be placed or mounted in such a manner as to allow flames or heat from the exhaust system to ignite any flammable material.</u></p> <p><u>(c) A spark arrester is a device constructed of nonflammable materials specifically for the purpose of removing and retaining carbon and other flammable particles over 0.0232 of an inch in size from the exhaust flow of an internal combustion engine that uses hydrocarbon fuels or which is qualified and rated by the United States Forest Service.</u></p> <p><u>(d) Engines used to provide motive power for trucks, truck tractors, buses, and passenger vehicles, except motorcycles, are not subject to this section if the exhaust system is equipped with a muffler as defined in the Vehicle Code.</u></p> |

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| | | | <p><u>(e) Turbocharged engines are not subject to this section if all exhausted gases pass through the rotating turbine wheel, there is no exhaust bypass to the atmosphere, and the turbocharger is in effective mechanical condition.</u></p> <p><u>(f) Motor vehicles when being operated in an organized racing or competitive event upon a closed course are not subject to this section if the event is conducted under the auspices of a recognized sanctioning body and by permit issued by the fire protection authority having jurisdiction.</u></p> <p><u>5.20.2.1.2.10 CCR Title 14, Section 4443</u></p> <p><u>No person shall use, operate, or cause to be operated on any forest-covered land, brush-covered land, or grass-covered land any handheld portable, multiposition, internal-combustion engine manufactured after June 30, 1978, which is operated on hydrocarbon fuels, unless it is constructed and equipped and maintained for the prevention of fire.</u></p> <p><u>The board shall, by regulation, specify standards for construction, equipment, and maintenance of such engines for the prevention of fire and shall specify a uniform method of testing to be used by engine and equipment manufacturers, governmental agencies, and equipment users. The regulations shall include specification of exhaust system standards for carbon particle retention or destruction, exposed surface temperature, gas temperature, flammable debris accumulation, durability, and serviceability.</u></p> <p><u>Portable power saw and other portable equipment described in this section which were manufactured prior to July 1, 1978, shall be subject to fire safety design specifications as prescribed by the board.</u></p> <p><u>5.20.2.1.2.11 California Multi-Hazard Mitigation Plan</u></p> <p><u>The State Hazard Mitigation Plan (SHMP) represents the state's primary hazard mitigation guidance document - providing an updated analysis of the state's historical and current hazards, hazard mitigation goals and objectives, and hazard mitigation strategies and actions. The plan represents the state's overall commitment to supporting a comprehensive mitigation strategy to reduce or eliminate potential risks and impacts of disasters in order to promote faster recovery after disasters and, overall, a more resilient state. State Hazard Mitigation Plans are required to meet the Elements outlined in FEMA's State Mitigation Plan Review Guide (revised March 2015, effective March 2016). Upon approval, the CA SHMP is then adopted by the State for implementation for the next five (5) years.</u></p> <p><u>5.20.2.1.2.11 2021/2022 Strategic Fire Plan for the San Bernardino Unit</u></p> <p><u>The 2021/2022 Strategic Fire Plan for the San Bernardino Unit provides a vision for a natural environment that is more fire resilient; buildings and infrastructure that are more fire resistant; and a society that is more aware of an responsive to the benefits and threats of wildfire; all achieve through local, state, federal, tribal, and private</u></p> |

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| | | | <p><u>partnerships. The Plan:</u></p> <ul style="list-style-type: none"> <u>• Was collaboratively developed. Interested parties, Federal, State, City, and County agencies within the Unit have been consulted and are listed in the plan.</u> <u>• Identifies and prioritizes pre-fire and post fire management strategies and tactics meant to reduce the loss of values at risk within the Unit.</u> <u>• Is intended for use as a planning and assessment tool only.</u> <p>5.20.2.1.3 Local</p> <p><u>5.20.2.1.3.1 Inyo County, California: Community Wildfire Protection Plan</u></p> <p><u>The Community Wildfire Protection Plan has the following primary purposes:</u></p> <ol style="list-style-type: none"> <u>1. To provide a comprehensive, scientifically-based analysis of wildfire related hazards and risks in the Wildland Urban Interface (WUI) areas of Inyo County, California.</u> <u>2. Using the results of the analysis, generate recommendations designed to prevent and/or reduce the damage associated with wildfire to WUI values in Inyo County.</u> <u>3. Create a Community Wildfire Protection Plan (CWPP) document for Inyo County which conforms to the standards for CWPPs established by the Healthy Forest Restoration Act (HFRA) and the State of California and local FireSafe Council.</u> <p><u>5.20.2.1.3.2 Mono County and the Town of Mammoth Lakes Multi-Jurisdictional Hazard Mitigation Plan (including the Mono County Community Wildfire Protection Plan)</u></p> <p><u>The Plan objectives include the following:</u></p> <ul style="list-style-type: none"> <u>• Establish and foster a basis for coordination and collaboration among County and Town agencies, other public organizations, private organizations and companies, and other key stakeholders.</u> <u>• Work in conjunction with other planning efforts, including the County's and the Town's General Plans.</u> <u>• Increase community awareness and empowerment.</u> <u>• Meet the requirements of federal assistance grant programs, including FEMA's Hazard Mitigation Grant Program (HMGP) and Pre-Disaster Mitigation (PDM) funding.</u> <u>• Reduce the risk of loss and damage from hazard events, especially repetitive loss and damage.</u> <u>• Coordinate hazard mitigation planning activities between Mono County and the Town of Mammoth Lakes and in concert with resource management, land use planning, and emergency operation activities.</u> <p><u>The Community Wildfire Protection Plan has the following primary purposes:</u></p> <ol style="list-style-type: none"> <u>1. To provide a comprehensive, scientifically-based analysis of wildfire related</u> |

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| | | | <p><u>hazards and risks in the Wildland-Urban Interface (WUI) areas of Mono County, California.</u></p> <p><u>2. Using the results of the analysis, generate recommendations designed to prevent and/or reduce the damage associated with wildfire to WUI values in Mono County.</u></p> <p><u>3. Create a Community Wildfire Protection Plan (CWPP) document for Mono County which conforms to the standards for CWPPs established by the Healthy Forest Restoration Act (HFRA) and the State of California and local FireSafe Council.</u></p> <p><u>5.20.2.1.3.3 Inyo County and City of Bishop Multi-Jurisdictional Hazard Mitigation Plan</u></p> <p><u>The Inyo County and City of Bishop Multi-Jurisdictional Hazard Mitigation Plan (ICCB 2016) establishes a strategy for Inyo County and the City of Bishop, California, to reduce hazard impacts. The Plan focuses on hazard mitigation in reducing the impacts of disasters by identifying effective and feasible actions to reduce the risks posed by potential hazards. The Plan develops mitigation actions to strengthen community resilience, which helps ensure coordinated and consistent hazard mitigation activities across Inyo County and Bishop. The County and the City have developed this Plan to be consistent with current standards and regulations, ensuring that the understanding of hazards facing the communities reflects best available science and current conditions. The Plan is also consistent with Federal Emergency Management Agency (FEMA) requirements.</u></p> <p>Please <u>also</u> see Sections 5.7.2, 5.9.2 and 5.10.2.</p> <hr/> <p>CCR Title 14 Section 1272 [PRC 4290] is applicable only to “residential, commercial, and industrial building construction”. No residential, commercial, or industrial building construction is included in the CSP Project and thus this section does not apply.</p> <p>CCR Title 14 Section 1272 [PRC 4291] is applicable to buildings or structures. No buildings or structures, as intended in the Code, are included in the CSP Project, and thus this section does not apply.</p> <p>CCR Title 14 Section 1254 [PRC 4296] (“Sections 4292 and 4293 do not apply if the transmission or distribution line voltage is 750 volts or less.”) is irrelevant as the CSP Project will be operated at a voltage greater than 750 volts.</p> <p>CCR Title 14, Section 4429 is irrelevant; no camp to be established under CSP Project.</p> <p>SCE is not a Timber Operator, therefore CCR Title 14, Forest Practice Rules Article</p> |

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| | | | 8, Rule #918 Fire Protection does not apply. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| WF-3 | Section 5.20.1.3 | <p>Fire Risk</p> <p>This section states, that because the work will be done in the same alignment as existing lines, the “rebuilding with modern infrastructure installed to current CPUCRules will not negatively alter the baseline fire risk in the area”; however, there is no analysis to justify this conclusion.</p> <p>Are there any other weather stations along the Project alignment? Weather from a RAWS station, which is compatible with fire behavior modeling is the industry standard in a wildfire analysis and is missing here.</p> <p>Provide a table of acreage for the Scott and Burgan fuel models and describe the models in the text.</p> | <p>The statement stands on its own merits. The CSP Project will replace antiquated electrical infrastructure with modern infrastructure designed and constructed to meet all relevant fire-prevention standards. Operation of the modern infrastructure will not increase the baseline fire risk.</p> <p>SCE has provided the weather data requested in the Guidelines.</p> <p>A table of acreages crossed by the CSP Project for the Scott and Burgan fuel model as shown in Figure 5.20-6 is provided below:</p> <table border="1" data-bbox="1659 707 1992 1520"> <thead> <tr> <th>FBFM40</th> <th>Acres</th> </tr> </thead> <tbody> <tr><td>GR1</td><td>333.6</td></tr> <tr><td>GR2</td><td>36.5</td></tr> <tr><td>GR4</td><td>0.3</td></tr> <tr><td>GS1</td><td>56.2</td></tr> <tr><td>GS2</td><td>257.4</td></tr> <tr><td>NB1</td><td>102.8</td></tr> <tr><td>NB3</td><td>0.7</td></tr> <tr><td>NB8</td><td>4.2</td></tr> <tr><td>NB9</td><td>7.8</td></tr> <tr><td>SH1</td><td>78.4</td></tr> <tr><td>SH5</td><td>122.0</td></tr> <tr><td>SH7</td><td>1.4</td></tr> <tr><td>TL2</td><td>0.5</td></tr> <tr><td>TL3</td><td>53.6</td></tr> <tr><td>TU1</td><td>11.4</td></tr> </tbody> </table> <p>Scott and Burgan Fire Behavior Fuel Model data for the area along the CSP Project alignment are presented in Figure 5.20-6.¹</p> <p>Footnote 1: The Scott and Burgan Fire Behavior Fuel Model 40 (FBFM40) product</p> | FBFM40 | Acres | GR1 | 333.6 | GR2 | 36.5 | GR4 | 0.3 | GS1 | 56.2 | GS2 | 257.4 | NB1 | 102.8 | NB3 | 0.7 | NB8 | 4.2 | NB9 | 7.8 | SH1 | 78.4 | SH5 | 122.0 | SH7 | 1.4 | TL2 | 0.5 | TL3 | 53.6 | TU1 | 11.4 |
| FBFM40 | Acres | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GR1 | 333.6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GR2 | 36.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GR4 | 0.3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GS1 | 56.2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GS2 | 257.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NB1 | 102.8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NB3 | 0.7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NB8 | 4.2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NB9 | 7.8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| SH1 | 78.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| SH5 | 122.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| SH7 | 1.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TL2 | 0.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TL3 | 53.6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TU1 | 11.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | | <p>represents distinct distributions of fuel loadings found among surface fuel components (live and dead), size classes, and fuel types. The fuel models are described by the most common fire carrying fuel type (grass, brush, timber, or slash), loading and surface area-to-volume ratio by size class and component, fuel bed depth, and moisture of extinction. FBFM40 contains more fuel models for every fuel type than Anderson Fire Behavior Fuel Model 13 (FBFM13), and the number of fuel models representing relatively high dead fuel moisture content is increased. In FBFM40 fuel models with an herbaceous component are dynamic, to simulate curing, rather than remaining constant. Vegetation products and 10-years of disturbance data were used to create Fuel Vegetation Type (FVT), Fuel Vegetation Cover (FVC), and Fuel Vegetation Height (FVH) for disturbed areas to represent pre-disturbance scenarios in FBFM40. A combination of pre-disturbance and non-disturbance Existing Vegetation Type (EVT) are used to assign surface fuel models. FBFM40 was developed using the most recent 10 years of Annual Disturbance products and is a capable fuels product that calculates Time Since Disturbance (TSD) assignments for disturbed areas using an "effective year." For example, year 2019 fuels may be calculated for the year 2019. This new process considers all the existing disturbances and adjusts the TSD for these to the effective year (2019 in this example), making the products "2019 capable fuels." More information about capable fuels can be found at https://www.landfire.gov/lf_remap.php.</p> |
| WF-4 | Section 5.20.1.3 Table 5.20-3 | <p>USDA Fire Effects Information System Vegetation Types</p> <p>There is no justification for using fire regimes as a measure of fire risk; these two are not highly correlated. An assessment of fire risk should be conducted. Table 5.20-3 should also include the acreage of each of these vegetation types in the project vicinity, not just the project area itself.</p> <p>Provide an assessment that measures the potential for damage from wildfire and combine the probability of the occurrence with the likely magnitude of damage. A fire behavior and occurrence analysis should be conducted that combines the impacts of those wildfires on values at risk.</p> | <p>Per CPUC direction, SCE has developed a computational fire model for the CSP Project. This model and its inputs have been provided under separate electronic cover.</p> |
| WF-5 | Section 5.20.1.4 | <p>Values at Risk</p> <p>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.</p> <p>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.</p> | <p>Modifications to Section 5.20.1.4 are presented below.</p> <p>Regarding "a table of the number of structures", SCE requests that the CPUC define what is meant by a "reasonable distance".</p> <hr/> <p>5.20.1.4 Values at Risk</p> <p>Communities near the CSP Project alignment, which include structures and other improvements (including utility-owned infrastructure) at risk from wildfire, are identified in Section 5.14 and are shown on Figure 5.14-1; sensitive receptors, which are another proxy for structures, are shown in Figure set 5.13-1. The vulnerability of these structures and improvements is typical for the region, and is dependent on the age of the structures and improvements and their physical siting. There is no rare habitat along the CSP Project alignment that is at risk from wildfire.</p> |

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| | | | <p><u>As presented in Section 5.4.1.5, no Federally or California Endangered or Threatened plant species were observed within the CSP Project alignment during the 2017 and 2018 surveys and no Federally or California Endangered or Threatened plant species have the potential to occur within the CSP Project alignment. Nine special-status plant species (those with a California Rare Plant Rank (CRPR) of 1B or 2B Plants that meet the definition of rare or endangered under CEQA, including species considered by the CNPS to be rare, threatened, or endangered in California (i.e., CRPRs 1A, 1B, 2A, 2B, and certain rank 3 and 4 species with local significance) were observed along the CSP Project alignment during the 2017-2018 surveys. Sensitive natural communities (Natural Communities with ranks of S1-S3 as defined under the CDFW VegCamp program) are also found along the CSP Project alignment as presented in Table 5.4-2. These special-status plant species and sensitive natural communities are values at risk from wildland fire along the CSP Project alignment.</u></p> |
| WF-7 | Section 5.20.4.1.1 | <p>Construction Effects on an Adopted Emergency Response Plan or Emergency Evacuation Plan</p> <p>It cannot be known whether a fire would cause evacuation impacts without a fire behavior analysis, which is missing from the PEA. Further, the PEA did not mention an emergency response plan, so we cannot know whether the project will impact it (See Deficiency #WF-6 above). Similarly, if there is an adopted evacuation plan, it is not included in this analysis. Describe both of these plans and compare to the results of a project-specific wildfire behavior analysis.</p> | <p>Per CPUC direction, SCE has developed a computational fire model for the CSP Project. This model and its inputs have been provided under separate electronic cover.</p> |
| 5.21 Cumulative Impacts (CI) | | | |