

November 16, 2021

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 #1 SCE Responses," included in this submittal for SCE's responses to the CPUC's September 15, 2021 PEA deficiency letter. The document includes SCE's responses to the deficiencies SCE and the CPUC identified as short-term deficiencies. Though some deficiencies 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*, SCE has made every effort to provide the requested information to assist the CPUC in its review of SCE's Application. SCE has targeted December 15<sup>th</sup> for the submission date of the mid-term deficiency responses.

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

Sincerely,

*/s/ David Balandran*

David Balandran  
Senior Advisor, Regulatory Affairs  
Southern California Edison Company

Enclosures

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~~.

ID	PEA Section(s)	Deficiency	Response/Modified Text
Chapter 2: Introduction			
2-1	Sections 2.2.1, 2.2.2 and Appendix G	Records of Consultation and Public Outreach Provide contact information, meeting dates, and meeting notes/records of communication for each entity contacted during pre-filing public outreach. Include any preliminary concerns and how they were addressed and any project alternatives that were suggested.	The titles of individuals with whom SCE has met, the dates of those meetings, and discussion summaries are provided in PEA Sections 2.2.1 and 2.2.2. SCE provided a summary of its meetings in Appendix G.  No preliminary concerns were identified. As stated in the PEA document, "No significant outcomes of consultation were incorporated into the CSP Project. No areas of controversy or major issues related to the CSP Project have been communicated to SCE by representatives from Inyo County, Mono County, or others contacted as described above." Additionally, no project alternatives have been suggested by any entities.
2-2	Section 2.3.3	National Environmental Policy Act Review Expand the section to address the following PEA Checklist requirements: Identify the NEPA Lead Agency Identify the specific project components (e.g., segments) that will be reviewed under the NEPA process Identify all agencies requiring review under NEPA	The Bureau of Land Management will serve as the NEPA Lead Agency. The entirety of the CSP Project will be reviewed under NEPA. The BLM, as Lead Agency, will identify and determine coordinating and cooperating agencies.
Chapter 3 Project Description			
3-3	Section 3.2.2.3	Expected Capacities of Proposed Facilities Provide quantified details on replacement conductor and existing substation equipment capacities in amps or megawatts. Identify the capacity change between existing conductor and replacement conductor.	Existing Conductor: 2/0 Cu: 405 Amperes Normal Rating @ 85C 4/0 AAC Oxlip: 420 Amperes Normal Rating @ 85C 4/0 ACSR 6/1: 415 Amperes Normal Rating @ 85C  Proposed Conductor: ACCC Zadar 350 kcmil: 765 Amperes Normal Rating @120C ACSR Merlin 336 kcmil: 605 Amperes Normal Rating @85C  Substation Ratings; White Mountain: 40E amp fuse Deep Springs: 13E amp fuse Zach: 2,000 amp Circuit Breaker Control: 1,200 amp Circuit Breaker
3-4	Section 3.3.4.1.2	Conductor/Cable Confirm that 38.7 miles of OPGW installation should be OHGW.	SCE will be installing 38.7 miles of OPGW. OHGW would be installed on one of the pole lines in Segment 2 <del>and on the new double circuit structures in Segment 3</del> . The OHGW would be approximately 0.5 inches in diameter and would be non-specular. Approximately <del>1.438-7</del> miles of <del>OP</del> HW would be installed.
3-5	Section 3.3.4.4	Different Facilities Would guy wires and anchors be placed within the GIS limits provided for construction work spaces at each pole? If not, provide estimated pole locations where guy wires and anchors may be necessary and identify any associated additional work space. Update impacts descriptions and analysis (including technical appendices) to reflect any revised work spaces. This is of particular concern for biological resource and cultural resource impacts that may not be accounted for.	SCE anticipates that guy wires and anchors would, generally be placed within the GIS limits provided for construction work spaces at each pole. The location of anchors would be determined during final engineering and/or during pole installation. In the event that a guy anchor is identified to be installed outside of a previously-identified construction work space, SCE will communicate the need for such installation prior to the anchor being installed.
3-7	Section 3.3.5.2	Aviation Lighting and Marking "SCE does not believe that any component of the CSP Project will require aviation lighting or marking." Provide justification for the quoted statement. Obtaining a preliminary determination by the FAA is preferred, particularly given the proposed project's proximity to an airport. Alternatively, identify all spans that may require aviation lighting or marking so that the effects of such features can be considered in the environmental analysis.	SCE has identified poles that will be included in the required FAA filing. Based on the distance of these poles from the Bishop Airport's runway(s) and the height of the poles, SCE does not believe that the spans or poles would require marking or lighting. SCE is developing a draft, not-for-filing FAA notice; when this has been developed, it will be provided to the CPUC. The not-for-filing FAA notice will be updated based on the final engineering for the CSP Project, and thus at the conclusion of final engineering and nearer the time of construction, SCE will develop and file a formal FAA notice.
3-8	Section 3.3.5.3	Temporary Work Areas in Steep Slopes	The Site_Access field in the GIS identifies those locations that would be accessed on foot or via

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		A number of proposed pole locations would be on steep slopes. The PEA identifies that such locations would be accessed on foot or via helicopter to avoid the need for civil engineering to address slope stabilization. Provide a GISlayer identifying all temporary work areas that will be accessed on foot or by helicopter only.	helicopter. Each location identified for helicopter access should also be considered as foot access.																
3-9	Section 3.3.5.3	Retaining Walls Given the substantial presence of sensitive biological, cultural, tribal, and paleontological resources in the proposed project alignment, a preliminary assessment of locations where retaining walls could be needed is required now, along with preliminary engineering design details (e.g., wall material type and estimated height, finishes, material quantities, footing depths). If SCE is unable to provide this information during this current environmental review, know that the addition of retaining walls after project approval could result in substantial delays in order to complete the necessary CEQA review and supplemental CEQA document.	SCE understands that there may be schedule delays associated with supplemental environmental review if needed for minor project refinements or for petitions for modifications.																
3-10	Sections 3.4.1	Land Ownership It appears that Figure 3.4-1 is supposed to illustrate land ownership; however, there is an error with the pdf of the figure that is preventing the legend from showing and the figure cannot be printed. Provide a corrected Figure 3.4-1. Provide also associated GIS data for land ownership.	Figure 3.4-1 and associated GIS provided under separate cover.																
	Sections 3.5.1.1.3 and 3.5.1.3.2	ROW for Overland Access The ROW for Overland Access in Table 3.5-1 states that "No restoration would be necessary"; however, 12.7 acres are identified for restoration. Suggest removing the clause "No restoration would be necessary" from Table 3.5-1. Section 3.5.1.3.2 describes that overland access routes will comprise an area of approximately 7.5 miles long by 14 feet wide. This equates to approximately 12.7 acres. Include a sentence in Section 3.5.1.3.2 to describe that up to 12.7 acres of overland access routes may need to be restored and reference Table 3.5-1.	<p><b>Table 3.5-1: Access and Spur Road Land Disturbance Table</b></p> <table border="1"> <thead> <tr> <th>Description</th> <th>Existing Permanent Disturbance (acres)</th> <th>Acres to be Restored</th> <th>Additional Permanent Disturbance (acres)</th> </tr> </thead> <tbody> <tr> <td><del>Previously graded. Rehabilitation as described in Section 3.5.1.1.</del></td> <td><del>128.8</del></td> <td><del>0</del></td> <td><del>26.2<sup>1</sup></del></td> </tr> <tr> <td><del>Typically 18-foot wide, bladed. No other preparation required although crushed rock may need to be applied in very limited areas for traction.</del></td> <td><del>0</del></td> <td><del>0</del></td> <td><del>0</del></td> </tr> <tr> <td><del>No preparation required. Typically grassy areas that are relatively flat. No restoration would be necessary.</del></td> <td><del>0</del></td> <td><del>12.7</del></td> <td><del>0</del></td> </tr> </tbody> </table> <p>Notes:  1 → The width of existing access and spur roads varies across the CSP Project. SCE's standard design for access and spur roads is that they have a width of 18 feet (a 14-foot drivable surface and 2-foot shoulders on each side of the road). At present, existing access and spur roads account for ~129 acres of disturbance. To determine this disturbance area, SCE performed a <del>photoimage</del> based analysis of the existing access road network and assigned an existing width to discrete portions of the access road network. The linear length of each discrete portion was then multiplied by the assigned width to determine the area of each discrete portion. The acreages of each discrete portion were then summed to generate the ~129 acres of disturbance. To bring these access and spur roads up to the SCE standard design, an additional ~26 acres would be permanently disturbed. No disturbance outside the 18-foot width (including vegetation trimming) is included in these calculations.  2 → No rehabilitation of the existing access roads in Segments 1, 4, and 5 is necessary due to the limited scopes of work in these segments.</p> <p>3.5.1.3.2 Overland Access Routes: Lengths and Widths  Approximately 7.5 miles of overland access routes would be used during construction of the CSP Project. No grading or gravel placement would occur in these areas. The overland access routes would be approximately 14 feet wide, <u>accounting for approximately 12.7 acres.</u></p>	Description	Existing Permanent Disturbance (acres)	Acres to be Restored	Additional Permanent Disturbance (acres)	<del>Previously graded. Rehabilitation as described in Section 3.5.1.1.</del>	<del>128.8</del>	<del>0</del>	<del>26.2<sup>1</sup></del>	<del>Typically 18-foot wide, bladed. No other preparation required although crushed rock may need to be applied in very limited areas for traction.</del>	<del>0</del>	<del>0</del>	<del>0</del>	<del>No preparation required. Typically grassy areas that are relatively flat. No restoration would be necessary.</del>	<del>0</del>	<del>12.7</del>	<del>0</del>
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3-18	Section 3.5.1.5.2	Helicopter Land Zone Permits Section 3.5.1.5.2 states that "If the construction contractor determines that helicopter-assisted construction is required at a given construction work area, and the given construction work area is not located proximate to an identified staging area or CLA, then a helicopter landing zone will be designated either along the alignment or off-alignment. Off-alignment landing zones outside of disturbed areas such as access or spur roads may have impacts on vegetation and other resources. Currently, only 0.46 acres of temporary disturbance is listed for one "Helicopter Landing Zones and Touchdown Areas" in Table 3.5-3. Provide a sentence in Section 3.5.1.5.2 to state that if the need for off-alignment landing zones in undisturbed habitat is identified, a Minor Project Refinement and associated environmental effects analysis would be developed and submitted to the CPUC. Local ministerial permits required would also be obtained.	3.5.1.5.2 Helicopter Access: Takeoff and Landing Areas Helicopter takeoff and landing areas typically include helicopter landing zones, staging areas, and construction laydown areas (CLAs), and public and private airports or airstrips. SCE anticipates using the staging areas listed in Table 3.5-2 as helicopter staging areas for the CSP Project; helicopter operation crews, as well as fueling and maintenance trucks, may be based in the staging areas.  If the construction contractor determines that helicopter-assisted construction is required at a given construction work area, and the given construction work area is not located proximate to an identified staging area or CLA, then a helicopter landing zone will be designated either along the alignment or off-alignment. <u>If the need for off-alignment landing zones in undisturbed habitat is identified, a Minor Project Refinement and associated environmental effects analysis would be developed and submitted to the CPUC.</u> In addition, helicopters should be able to land within SCE ROWs, which could include landing on access or spur roads. At night or during off days, for safety and security concerns, helicopters may be based at a local airport(s) or airstrips.																
3-19	Section 3.5.2.2	Staging Area Preparation Describe any secondary containment proposed for hazardous materials storage at staging areas.	Secondary containment would be described in the SWPPP(s) developed for the CSP Project and in any applicable SPCC Plan. Secondary containment could include impermeable barrier materials in																

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			underneath and around stores, installation of pre-formed barriers, use of double-walled containers, diking, and use of material storage pallets, among others.
3-20	Section 3.5.2.2.1	Staging Area Impacts The site preparation description states “Any land that may be disturbed at the staging areas would be returned to preconstruction conditions or left in its modified condition as agreed to by the landowner, following the completion of construction for the CSP Project.” Staging areas not restored would constitute a permanent impact and may induce subsequent development. Table 3.5-3 contains zero acres of permanent disturbance associated with Staging Areas/CLAs. Identify staging areas that may be left in a modified condition and not returned to pre-construction conditions, including an estimated amount of permanent disturbance. Alternatively, remove the statement that some areas may not be restored.	3.5.2.2.1 Site Preparation With the exception of staging areas that are asphalted or already have a rock base, grubbing (i.e., vegetation removal) and/or minor grading will be required to provide a plane and dense surface for the application of gravel or crushed rock. No new access roads would be constructed to access any of the staging areas. Any land that may be disturbed at the staging areas would be returned to preconstruction conditions <del>or left in its modified condition as agreed to by the landowner</del> , following the completion of construction for the CSP Project.
3-21	Section 3.5.3.2 Table 3.5-4	Excavated Material Does the permanent footprint per Pole/ Tower include the footing structure and the spoils, which may be rock, from the excavated holes? Section 3.3.4.5.2 Foundations did not describe that the spoils would be removed from the work areas. Section 3.5.14 Waste Generation and Management does not explicitly describe the handling of excavated material. Provide detail on anticipated spoils and on handling of excavated materials.	Yes. It is assumed that any spoils from excavated holes would be placed within the permanent disturbance area identified in Table 3.5-4, <u>or would be disposed off-site at an appropriate facility.</u>  <u>3.5.14 Waste Generation and Management</u> <u>3.5.14.4 Excavated Material</u> Materials excavated during removal of existing poles and installation of new subtransmission structures would primarily be: used to backfill holes left from removing poles; placed adjacent to new structures within the permanent disturbance area associated with each new structure; or placed on other areas identified for permanent disturbance (e.g., access road widening areas). In rare instances, excavated materials may be disposed off-site at an appropriate facility.
3-22	Section 3.5.4.3	Vegetation Clearing Describe how vegetation that is “brushed” will be disposed of.	<u>3.5.4.3.4 Vegetation Clearing: Disposition of Material</u> <u>Vegetation cleared as part of the CSP Project would be disposed of off-site at an appropriate disposal facility unless otherwise directed by an agency with jurisdiction over the CSP Project.</u>
3-25	Section 3.5.5.1.3	Excavated Material Section describes that “Excavated material would be used as described in Section 3.5.14, Waste Generation and Management”; however, Section 3.5.14 does not describe how excavated material will be used. Provide an explanation of how excavated material will be used.	Solid Waste Streams Construction of the CSP Project would result in generation of various solid wastes including metals (from the removed conductor and associated fittings), wood poles, wood pallets, cardboards/papers (e.g., from material packaging), <del>and</del> worker-generated solid waste (e.g., food and food packaging), <u>and excavated material.</u>  ...  <u>3.5.14.1.6 Excavated Material</u> <u>Excavated material will be either spread on-site within the permanent disturbance area associated with replacement structures, would be used to backfill the holes left when existing poles are removed, or would be disposed off-site at an appropriate facility.</u>
3-27	Section 3.5.14.2.1	Liquid Waste Streams This section of the PEA states that drilling mud is not expected to be generated; however, Section 3.5.5.1.3 (Foundation Installation) describes the potential use of drilling mud slurry. This discrepancy needs to be rectified one way or the other.	3.5.14.2.1 Liquid Waste Streams Sanitary waste is the only liquid waste planned to be generated during construction of the CSP Project. No other liquid wastes (e.g., drilling muds, contaminated waters) are expected to be generated by the CSP Project. <u>If drilling muds are used, the drilling mud would, as described in Section 3.5.5.1.3, be vacuumed directly into a truck to be reused or discarded at an appropriate off-site disposal facility.</u>
3-31	Section 3.11 Table 3.11-1	APM BIO-AVI-5 The thirty-day window for preconstruction burrowing owl surveys contradicts the current CDFW guidelines (CDFG 2012). Appendix D of CDFG 2012 states that takeavoidance surveys should be completed no less than 14 days prior to initiating ground disturbance activities. Phasing the burrowing owl surveys ahead of planned ground disturbance can minimize the number of surveys required.	Pre-construction survey. A pre-construction, focused burrowing owl survey will be conducted no more than <del>1430</del> days prior to initial start of construction within habitat to determine if any occupied burrows are present.
3-32	Section 3.11 Table 3.11-1	APM BIO-BOT-2 APM BIO-BOT-2 states “If restoration is not feasible, SCE shall provide compensation lands consisting of habitat occupied by the impacted [add names of the sensitive tree, cactus, shrub, or yucca species] ...” Replace the bracket text with the relevant species.	<i>Special-status Perennial Plants and Other Species</i> SCE shall avoid, minimize, or mitigate impacts to special-status perennial plants and other species that may be located on the project disturbance areas or surrounding buffer areas.

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			<p>Pre-construction survey. Pre-construction surveys will be conducted by a qualified specialist to identify any special-status perennial species or other species of tree, shrub, cactus, or yucca in the project area that require restoration or mitigation. Surveys will be consistent with the protocol outlined by CDFW Protocols for Surveying and Evaluating Impacts to Species Status Native Plant Populations and Sensitive Nature Communities (May 2018). Pre-construction surveys will focus on identifying new individuals or occurrences not captured in focused surveys. Where special-status perennial plants or other species are known to occur, all work shall occur outside a 10-ft buffer. Buffer reductions may occur with the implementation of appropriate minimization measures. A qualified botanist/arborist monitor, with the authority to halt work, shall be present whenever work occurs within reduced buffers. If avoidance of listed species is not feasible, SCE will consult with USFWS/CDFW and implement additional measures pursuant to FESA/CESA, required after consultation.</p> <p>In the event of an unexpected discovery of a new species or previously undocumented occurrence, the same steps will be used as discussed above. In addition, when there is an unexpected discovery of a new species, the CPUC, BLM, USFS, CDFW, and/or USFWS will be notified.</p> <p>Restoration and Mitigation Coordinate with Agencies. Agencies shall approve any impacts to special-status perennial plants and other species.</p> <p>Habitat Restoration and Revegetation. If individuals of special-status species cannot be avoided, a Habitat Restoration and Revegetation Plan (HRRP) shall address removal or salvage methods, number of individuals to be impacted, and restoration (see BIO-RES-1). A Habitat Mitigation and Management Plan (HMMP) shall address mitigation. Approval of the HRRP by appropriate agencies is required before impacts to the given species is allowed. A draft HMMP will be submitted to the appropriate agencies prior to impacts to the given species.</p> <p>Tree Removal. Tree removal and trimming will be designed to minimize the total number of individual trees removed or significantly trimmed. A qualified arborist will be onsite to make recommendations on trimming and removal. Protection and replacement of trees impacted by project activities will be mitigated consistent with applicable jurisdiction and agency requirements, and included in the HRRP.</p> <p>Offsite Compensation. If restoration is not feasible, SCE shall provide compensation lands consisting of habitat occupied by the impacted species <del>[dwarf ninebark, Bailey's greasewood, sagebrush cholla]</del><del>[add names of the sensitive tree, cactus, shrub, or yucca species]</del> at a 1:1 ratio of individuals or acreage, for any occupied habitat affected by the project. Occupied habitat will be calculated on the project site and on the compensation lands as including each special-status plant occurrence. If compensation is selected as a means of mitigating special-status plant impacts, it may be accomplished by purchasing credit in an established mitigation bank, acquiring conservation easements, or direct purchase and preservation of compensation lands. Compensation for these impacts may be "nested" or "layered" with compensation for habitat loss.</p> <p>Annual construction monitoring reports shall be submitted to CPUC and BLM. Reports shall include, but not limited to, details of individuals or occurrences impacted (removed or salvaged), salvage, temporary storage, if applicable, and final transplant locations, including species, number, size, condition, at a minimum; adaptive management efforts implemented (date, location, type of treatment, results, etc.); and evaluation of success of transplantation. After construction, salvage status will be described in the HRRP annual report.</p>
3-33	Section 3.11 Table 3.11-1	APM BIO-RES-2 The second paragraph of APM BIO-RES-2 states "... (3) identified by [applicable lead federal agency] as special concern." Replace bracketed text with the applicable federal agency.	Develop Invasive Plant Management Plan SCE shall prepare and implement an Invasive Plant Management Plan (IPMP). This plan shall include measures designed to avoid the introduction and spread of new nonnative invasive plant species (invasive plants) and minimize the spread of existing invasive plants resulting from project activities. The IPMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. The IPMP shall be submitted to the CPUC and BLM for review and approval

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			<p>prior to the start of construction.</p> <p>For the purpose of the IPMP, invasive plants shall include plants that (1) are invasive and rated high or moderate for negative ecological impact in the California Invasive Plant Inventory Database (Cal-IPC 2020), or (2) aid and promote the spread of wildfires (such as Bromus tectorum (cheatgrass), Brassica tournefortii (Sahara mustard), and Bromus madritensis spp. Rubens (red brome)) or (3) identified by <del>the BLM [applicable lead federal agency]</del> as special concern. The IPMP will be implemented throughout project pre-construction, construction, and restoration phases.</p> <p>Invasive Plant Management Plan. The IPMP will include the information defined in the following sections: Assessment. An assessment of the Proposed Project's potential to cause spread or introduction of invasive plants into new areas, or to introduce new invasive plants into the ROW. This section will list known and potential invasive plants occurring on the ROW and in the project region and identify threat rankings and potential for project-related occurrence or spread for each species. This section will identify control goals (e.g., eradication, suppression, or containment) for invasive plants of concern with potential to occur on the ROW.</p> <p>Pre-construction invasive plant inventory. SCE shall inventory of all invasive plants of concern in areas (both within and outside the ROW) subject to project-related vegetation removal/disturbance, "drive and crush," and ground-disturbing activity. The invasive plants inventory area shall also include vehicle and equipment access routes within the ROW and all project staging and storage yards. Invasive plants of concern shall be mapped by area of occurrence and percent cover. The map will be updated with new occurrences at least once a year.</p> <p>Pre-construction invasive plants treatment. Invasive plant infestations identified in the pre-construction invasive plants inventory shall be evaluated to identify potential for project-related spread and potential benefits (if any) of pre-construction treatment. Pre-construction treatment will consider the specific invasive plants, potential seed banks, or other issues. The IPMP will identify any infestations to be controlled or eradicated prior to project construction. Control and follow-up monitoring of pre-construction invasive plants treatment sites will follow methods identified in appropriate sections of the IPMP.</p> <p>Prevention. The IPMP will specify methods to minimize potential transport of new invasive plant seeds onto the ROW, or from one section of the ROW to another. The ROW may be divided into "weed zones," based on invasive plants of concern in the ROW. The IPMP will specify inspection procedures for construction equipment entering the Proposed Project area. Vehicles and equipment may be inspected and cleaned at entry points to specified sections of the ROW, and before leaving work sites where invasive plants of concern must be contained locally. Construction equipment shall be inspected to ensure it is free of any dirt or mud that could contain invasive plant seeds, roots, or rhizomes, and the tracks, outriggers, tires, and undercarriage will be carefully washed, with special attention being paid to axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Other construction vehicles (e.g., pick-up trucks) that will be frequently entering and exiting the site will be inspected and washed on an as-needed basis. Tools such as chainsaws, hand clippers, pruners, etc., shall be cleaned of dirt and mud before entering project work areas.</p> <p>All vehicles will be washed off-site when possible. If off-site washing is infeasible, on-site cleaning stations (including air washing) will be set up at specified locations to clean equipment before it enters the work area. Wash stations will be located away from native habitat or special-status species occurrences. Wastewater from cleaning stations will not be allowed to run off the cleaning station site. When vehicles and equipment are washed, a daily log must be kept stating the location, date and time, types of equipment, methods used, and personnel present. The log shall contain the signature of the responsible crewmember. Written or electronic logs shall be available to BLM and CPUC monitors on request.</p>

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			<p>Erosion control materials (e.g., straw bales) must be certified free of invasive plant seed (“weed-free”) before they are brought onto the site. The IPMP must prohibit on-site storage or disposal of mulch or green waste that may contain invasive plant material. Mulch or green waste will be removed from the site in a covered vehicle to prevent seed dispersal and transported to a licensed landfill or composting facility.</p> <p>The IPMP will specify guidelines for any soil, gravel, mulch, or fill material to be imported into the Proposed Project area, transported from site within the Proposed Project area, or transported from the Proposed Project area to an off-site location, to prevent the introduction or spread of invasive plants to or from the Proposed Project area.</p> <p>Monitoring. The IPMP shall specify methods to survey for invasive plants of concern during pre-construction, construction, and restoration phases; and shall specify qualifications of specialists responsible for invasive plant monitoring and identification. It must include a monitoring schedule to ensure timely detection and immediate control of new invasive plant infestations to prevent further spread. Surveying and monitoring for invasive plant infestations shall occur at least two times per year, to coincide with the early detection period for early season and late season invasive plants. The monitoring section shall also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control.</p> <p>Control. The IPMP must specify manual and chemical invasive plant control methods to be employed. The IPMP shall include only invasive plant control measures with a demonstrated record of success for target invasive plants, based on the best available information. The plan shall describe proposed methods for promptly scheduling and implementing control activity when any project-related invasive plant infestation is located (e.g., located on a project disturbance site), to ensure effective and timely invasive plant control. Invasive plant infestations must be controlled or eradicated as soon as possible upon discovery, and before they go to seed, or when appropriate with the goal to prevent further spread. All proposed invasive plant control methods must minimize disturbance to native vegetation, limit ingress and egress to defined routes, and avoid damage to any Environmentally Sensitive Areas (ESAs) identified within or adjacent to the ROW. New infestations by invasive plants of concern will be treated at a minimum of once annually until eradication, suppression, or containment goals are met. Invasive plant occurrences can be considered eradicated when no new seedlings or resprouts are observed for three consecutive years, or a single season where new seedlings or resprouts are observed in reference populations but not at the control site. Invasive plant control efforts may cease when eradication is complete.</p> <p>Manual control shall specify well-timed removal of invasive plants or their seed heads with hand tools; seed heads and plants must be disposed of in accordance with guidelines from the Inyo and Mono county Agricultural Commissioners if such guidelines are available.</p> <p>The chemical control section must include specific and detailed plans for any herbicide use. It must indicate where herbicides will be used, which herbicides will be used, and specify techniques to be used to avoid drift or residual toxicity to native vegetation or special-status plants, consistent with BLM’s Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States (BLM, 2007) and National Invasive Species Management Plan (NISC, 2008). All herbicide applications will follow U.S. Environmental Protection Agency label instructions and will be in accordance with federal, state, and local laws and regulations. Only state and BLM-approved herbicides may be used. Herbicide treatment will be implemented by a Licensed Qualified Applicator. Herbicides shall be applied in accordance with product labels and applicator licenses. Herbicides shall not be applied during or within 24 hours of high confidence predicted rain. Only water-safe herbicides shall be used in riparian areas or within channels (engineered or not) where they could run off into downstream areas. Herbicides shall not be applied in high wind conditions.</p> <p>Reporting schedule and contents. The IPMP shall specify reporting schedule and contents of each</p>

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AQ-1	Section 5.3 and Section 5.8	<p><b>Air Quality Modeling</b></p> <p>A review was conducted of the CalEEMod output (construction equipment, employee vehicles, and haul truck emissions) and helicopter emissions with comparison to Table 3.6-1: Construction Equipment and Workplace Estimates. The equipment type, equipment horsepower, number of pieces of equipment, load factor, hours per day of operation, and number of days of usage (start/end dates) were consistent between CalEEMod (Appendix B) and Table 3.6-1 for each of the construction activity tasks. The estimated construction workforce, number of worker trips, number of venter trips, and number of hauling trips compares correctly with the information within CalEEMod and Table 3.6-1.</p> <p>Helicopter emission calculations use the proper information from the Swiss Federal Office of Civil Aviation Guidance on Determination of Helicopter Emissions (December 2015). The inclusion of fugitive dust emissions associated with helicopters is acknowledged.</p> <p>The annual construction emissions by year shown in Table 5.3-2: Estimated Controlled Construction Emissions and Table 5.3-3: Estimated Uncontrolled Construction Emissions are consistent with the total emissions from CalEEMod and the helicopter operations. The estimated GHG emissions within Section 5.8 are properly representative of the information within CalEEMod and the helicopter operations.</p> <p>Provide an electronic copy of the CalEEMod input file.</p>	Electronic copy of the CalEEMod files were submitted to the CPUC as Attachment B of the CSP PEA; submittal occurred on 26 August 2021.																																																																																																
AQ-2	Section 5.3.4.1.2.1 Table 5.3-2 and Table 5.3-3	<p><b>Construction Emissions Tables</b></p> <p>The measurement units for the Significance Thresholds are tons per year only. Remove the label for pounds per day as this is not necessary and provides confusion.</p>	<p><b>Table 5.3-2: Estimated Construction Emissions, Controlled</b></p> <table border="1"> <thead> <tr> <th>Construction Year</th> <th>VOC</th> <th>NO<sub>x</sub></th> <th>SO<sub>2</sub></th> <th>PM<sub>10</sub></th> <th>PM<sub>2.5</sub></th> </tr> </thead> <tbody> <tr> <td>2024</td> <td>0.672</td> <td>15.8</td> <td>0.079</td> <td>7.63</td> <td>0.931</td> </tr> <tr> <td>2025</td> <td>0.509</td> <td>11.0</td> <td>0.055</td> <td>9.28</td> <td>1.06</td> </tr> <tr> <td>2026</td> <td>2.04</td> <td>17.3</td> <td>0.099</td> <td>8.98</td> <td>1.12</td> </tr> <tr> <td>2027</td> <td>0.009</td> <td>0.042</td> <td>0.000</td> <td>4.94</td> <td>0.501</td> </tr> <tr> <td>Maximum</td> <td>2.04</td> <td>17.3</td> <td>0.099</td> <td>9.28</td> <td>1.12</td> </tr> <tr> <td>Significance Threshold (pounds per day: tons per year)</td> <td>25</td> <td>25</td> <td>27</td> <td>15</td> <td>None</td> </tr> <tr> <td>Exceedance?</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> <td>N/A</td> </tr> </tbody> </table> <p><b>Table 5.3-3: Estimated Construction Emissions, Uncontrolled</b></p> <table border="1"> <thead> <tr> <th>Construction Year</th> <th>VOC</th> <th>NO<sub>x</sub></th> <th>SO<sub>2</sub></th> <th>PM<sub>10</sub></th> <th>PM<sub>2.5</sub></th> </tr> </thead> <tbody> <tr> <td>2024</td> <td>0.727</td> <td>16.3</td> <td>0.079</td> <td>18.5</td> <td>2.04</td> </tr> <tr> <td>2025</td> <td>0.576</td> <td>11.5</td> <td>0.055</td> <td>23.0</td> <td>2.46</td> </tr> <tr> <td>2026</td> <td>2.20</td> <td>19.0</td> <td>0.099</td> <td>21.5</td> <td>2.43</td> </tr> <tr> <td>2027</td> <td>0.016</td> <td>0.133</td> <td>0.000</td> <td>12.6</td> <td>1.28</td> </tr> <tr> <td>Maximum</td> <td>2.20</td> <td>19.0</td> <td>0.099</td> <td>22.95</td> <td>2.45</td> </tr> <tr> <td>Significance Threshold (pounds per day: tons per year)</td> <td>25</td> <td>25</td> <td>27</td> <td>15</td> <td>None</td> </tr> <tr> <td>Exceedance?</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>N/A</td> </tr> </tbody> </table>	Construction Year	VOC	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	2024	0.672	15.8	0.079	7.63	0.931	2025	0.509	11.0	0.055	9.28	1.06	2026	2.04	17.3	0.099	8.98	1.12	2027	0.009	0.042	0.000	4.94	0.501	Maximum	2.04	17.3	0.099	9.28	1.12	Significance Threshold (pounds per day: tons per year)	25	25	27	15	None	Exceedance?	No	No	No	No	N/A	Construction Year	VOC	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	2024	0.727	16.3	0.079	18.5	2.04	2025	0.576	11.5	0.055	23.0	2.46	2026	2.20	19.0	0.099	21.5	2.43	2027	0.016	0.133	0.000	12.6	1.28	Maximum	2.20	19.0	0.099	22.95	2.45	Significance Threshold (pounds per day: tons per year)	25	25	27	15	None	Exceedance?	No	No	No	Yes	N/A
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BIO-2	Section 5.4.1.3 Table 5.4-2	<p><b>California State Rarity Rankings Outdated</b></p> <p>The California State Rarity Ranking is based on outdated information. A new list of Sensitive Natural Communities was released by the California Department of Fish and Wildlife on August 18, 2021. For example, Small-leaf Mountain Mahogany Scrub; <i>Cercocarpus intricatus</i> Association is ranked S2 in the table, but it is ranked S3 in the 2021 ranking. Revise the table based on most recent list of Sensitive Natural Communities.</p>	Revised table attached at end of this document.																																																																																																
BIO-3	Section 5.4.1.3.1 page 5-46	<p><b>California State Natural Communities List Outdated</b></p> <p>Paragraph 1, sentence 2 references the updated California State Natural Communities List (CDFW 2018a). A new list of Sensitive Natural Communities was released by the California Department of Fish and Wildlife on August 18, 2021. Revise the reference and associated rankings where they differ.</p>	<p>5.4.1.3.1 Sensitive Natural Communities</p> <p>Sensitive natural communities are defined as communities of limited distribution within California or within a county or region. These communities may or may not contain special-status species. CDFW has assigned Alliance Rarity Ratings to alliances included in the California Manual of Vegetation, Second Edition (Sawyer, Keeler-Wolfe, and Evens 2009) and in the updated California State Natural Communities List (CDFW 202148a). Sensitive natural communities are treated by CDFW as alliances</p>																																																																																																



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			<p>or associations with “threat” ranks of S3 or higher (S1, S2, S3), whereas S4 and S5 rankings are not designated as sensitive or threatened (CDFW 2021<del>18a</del>). The state ranking system for S3 and above includes the estimated number of existing acres in California for the sensitive natural communities. The rankings are defined as follows:</p> <p>9.1.4 Biological Resources</p> <p>...</p> <p>CDFW. 2021. Vegetation Classification and Mapping Program – Natural Communities. <a href="http://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities">http://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive natural communities</a></p>
BIO-8	Section 5.4.1.8	<p>Permanent and Temporary Loss of Habitat</p> <p>Description states there are no known approved local, regional, or state habitat conservation plans covering the CSP Project alignment; however, the CSP Project alignment occurs within the boundary of the California Desert Conservation Area Plan described in section 5.4.2.1.1.4.</p>	<p>CDCA is a federal plan. No change made. See discussion of the CDCA in Section 5.4.2.1.1.4.</p>
BIO-9	Section 5.4.4.1.1.1 Section 5.4.4.1.2.1	<p>APM References</p> <p>APM BIO-BOT-02 is referred to as “Special-status Tree/Shrubs/Cactus” whereas in Table 3.11-1 it is titled “Special-status Perennial Plants and Other Species.” Update APM references as appropriate.</p>	<p>The vast majority (94 percent) of the observed special-status plant individuals (excluding bristlecone pine trees) are annuals or herbaceous perennials that pass the dry season as seeds or as dormant plants with no above-ground green foliage and underground storage organs. Soil-disturbance activities may disturb the existing seed bank of special-status and other native plants, along with bulbs, corms, rhizomes, and other soil storage organs. To avoid and minimize potential impacts to special-status herbaceous plants, individuals and colonies of these species would be flagged and avoided, when feasible and APM BIO-BOT-01: Special-status Herbaceous Plants would be implemented. To avoid and minimize potential impacts to special-status plant species from 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 native species 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. SCE would also implement APM BIO-BOT-2: Special-status <u>Perennial Plants and Other Species Tree/Shrubs/Cactus</u>, which contains measures such as pre-construction surveys, and flagging and marking for avoidance to avoid or minimize potential impacts to special-status herbaceous species, shrubs, trees, and cacti. To reduce competition from noxious and invasive weeds, which may crowd out special-status plant species, SCE would develop and implement an Invasive Plant Management Plan (IPMP) as described in APM BIO-RES-2: Develop Invasive Plant Management Plan. If populations or individuals of special-status plants cannot be avoided, SCE would implement restoration activities as described in APM BIO-RES-1: Develop Habitat Restoration and Revegetation Plan (HRRP). The HRRP would include provisions to restore special-status species removed during CSP Project construction activities, along with suitable habitat for the species.</p>
BIO-10	Section 5.4.4.1.1.1	<p>Vehicle Travel Measures</p> <p>The final paragraph under the Amphibians setting states “To avoid potential impacts to other 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.” These APMs do not appear to include vehicle travel measures. Describe applicable vehicle travel measures or remove the reference to them.</p>	<p>The content of APM WEAP has not yet been developed and would, as necessary, incorporate a discussion regarding vehicle travel measures in areas where special-status sensitive amphibians may be present.</p> <p>To be responsive to this comment the following text change has been made:</p> <p>To avoid potential impacts to other 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 <del>and vehicle travel</del> measures to protect special-status sensitive amphibians. With the implementation of these avoidance measures and APMs, impacts to special-status amphibians would be less than significant.</p>
BIO-11	Section 5.4.4.1.1.1	<p>Swainson’s Hawk Nest</p> <p>The third paragraph on page 5-94 states “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</p>	<p>CSP Project construction work activities may potentially impact special-status birds, their nests, and foraging habitats. <u>While the nest of a Swainson’s hawk was identified during the wildlife surveys, the scope of work under the CSP Project has been reduced since the surveys were performed; as a result</u></p>

ID	PEA Section(s)	Deficiency	Response/Modified Text
		during the surveys." Earlier in the section, it is stated that the California Threatened species Swainson's hawk was observed nesting within 85 feet of the CSP Project alignment. Revise this sentence to clarify that a Swainson's hawk nest was observed during surveys, or that no nests of listed species were observed in Project work areas.	<del>this nest is now located more than one mile away from the nearest construction work area. No other</del> nests of listed avian species were observed during the surveys.
BIO-18	Section 5.4.4.1.6.1 and 5.4.4.1.6.2	California Desert Conservation Area Plan Description states that there are no known approved local, regional, or state habitat conservation plans covering the CSP Project alignment, but portions of the alignment fall within the California Desert Conservation Area Plan described in section 5.4.2.1.1.4. Update the PEA to address consistency with the California Desert Conservation Area Plan.	CDCA is a federal plan. No change necessary.
BIO-20	Appendix C.1. Habitat Assessment Technical Report Section 4.2.5	Vegetation Types Dominated by Plants with Wetland Indicator Status The Fourwing Saltbush ( <i>Atriplex canescens</i> ) alliance is described as having a wetland indicator status for this alliance type as "FACU", but the Arid West indicator list does not provide a status for the dominant species. Revise the text so that the indicator status matches the Arid West indicator list status of "None".	4.2.5 Fourwing Saltbush Scrub ( <i>Atriplex canescens</i> Shrubland Alliance) Fourwing Saltbush Scrub is dominated by fourwing saltbush, a shrub in the Goosefoot Family (Chenopodiaceae). Shrublands dominated by fourwing saltbush occur primarily on slopes and in valleys from below 240 to above 6,900 feet (75 to 2,100 meters) amsl in arid regions in the Intermountain West, including the Great Basin, the Mojave and Sonoran deserts, encompassing the southern two-thirds of California north to Canada and east from North Dakota south to Texas. Fourwing saltbush is a relatively long-lived shrub resistant to salt, cold and drought. Fourwing Saltbush Scrub along the CSP alignment was found along washes and on adjacent slopes in lowlands and slopes at the mouths of canyons, including in the Chalfant Valley, Deep Springs Valley, mouth of Wyman Canyon, and Fish Lake Valley. Associated woody species include Mojave indigo bush, cheesebush, big sagebrush, and spiny hopsage. Soils tend to be sandy, carbonate rich, alkaline, or sandy clay loams.  <del>Fourwing saltbush has no wetland indicator status a wetland indicator status of facultative upland (FACU; Lichvar et. al 2016), meaning that it is a facultative upland plant that typically occurs in non-wetland habitats but may occur in standing water or saturated soils (Lichvar et al. 2016).</del>
BIO-21	Appendix C.1. Habitat Assessment Technical Report Section 4.2.21	Interior Rose Thickets The Interior Rose Thickets alliance is described as having a wetland indicator status for this alliance type as "FAC", but the Arid West indicator list includes "FACU" for the dominant species. Revise the indicator status to match the Arid West indicator list status.	4.2.21 Interior Rose Thickets ( <i>Rosa woodsii</i> Shrubland Alliance) Interior Rose Thickets are dominated by interior rose, also called Wood's rose, a spreading shrub in the Rose Family (Rosaceae). Shrublands dominated by interior rose occur on the margins of streams, meadows, marshes, and roadside ditches between 2,625 to 5,000 feet (800 to 1,524 meters) amsl from the northmost California counties south through the Sierra Nevada, into the Transverse Ranges in Kern, San Bernardino, Ventura, Los Angeles, and Riverside counties north to Canada, east to Michigan and Texas, and south into northern Mexico.  Interior Rose Thickets consist of dense stands of Wood's rose along with other woody and herbaceous species. Interior rose is common along montane streams in the arid west, and when large thickets form, usually there are a few canopy trees but few other associates. Along the CSP alignment, Interior Rose Thickets occur with sandbar willow ( <i>Salix exigua</i> ), desert sweet, and in one location, an invasive woody ornamental tree, black locust ( <i>Robinia pseudoacacia</i> ). Wood's rose has a wetland indicator status of facultative <u>upland</u> (FACU; ), <del>meaning it is a plant that is equally likely to occur in wetlands as in non-wetlands (Lichvar et al. 2016).</del>
BIO-22	Appendix C.2. Preliminary Jurisdictional Delineation Technical Reports	Figure Standards Figures are not consistent with the <i>Updated Map and Drawing Standards for the South Pacific Division Regulatory Program (February 10, 2016)</i> : <i>5. Delineations of waters of the United States</i> <i>j. Each line or polygon representing a water of the U.S. must be labeled with a unique name (For example, WL1, WL2, VP1, VP2, STR1, STR2, etc.). Multi-geometry features, such as streams split by a culvert crossing, shall be separated into individual sections, each with their own unique names (For Example, STR1a, STR1b, etc.).</i> Some features in Appendix E (USACE Jurisdictional Waters Mapping) and Appendix F (CDFW Jurisdictional Waters Mapping) do not label split figures with their own unique names (e.g., US0063 on Figure 46 of 56, Appendix E USACE Jurisdictional Waters Mapping; CA0063 on Figure 46 of 56, Appendix F CDFW Jurisdictional Waters Mapping). <i>8. Ground photograph Maps</i>	The CPUC's PEA Guidelines do not require that figures be developed per the referenced document. No change.

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		<p>b. Each photo-point must be labeled with a unique name and the compass direction in which the photograph was taken (e.g., a dot with an arrow or labels such as P1-NW and P1-315°). Photopoints are not labeled on Appendix E (USACE Jurisdictional Waters Mapping) or Appendix F (CDFW Jurisdictional Waters Mapping) figures. To find the photopoint, must locate the unique identifier of the feature that the photopoint is taken of (e.g., US0001) in the photopoint caption (Appendix G) and then search for that feature on the Appendix F figures.</p> <p>c. A table must be provided either on the map or as a separate attachment, which lists each uniquely named photograph, its geographic coordinates (latitude, longitude), the compass direction in which the photograph was taken (e.g., N, NW, 45°, 270°, etc.), and a brief explanation of the photograph's relevance. A separate table is not provided. In the photo caption under each photo in Appendix G (Photographic Log), each photo is provided with a unique identifier with general compass directions (e.g., facing south), however, geographic coordinates are not listed.</p> <p>Update the figures to be consistent with the <i>Minimum Standards for Acceptance of Aquatic Resources Delineation Reports (January 2016)</i>.</p> <p>For the maps depicting aquatic resources, a reference block that identifies the site or project name, individual(s) who conducted the delineation, date of the map, and date(s) of any revisions is missing. Field data forms are included in Appendix D (Field Data Forms); however, data points are not depicted on the figures.</p>																																																							
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EN-2	Section 5.6.2.1.1	<p>Federal Energy Regulatory Commission Regulations</p> <p>Provide language on applicable Federal Energy Regulatory Commission (FERC) regulations. Federal vehicle standards would be applicable given cars and trucks would be used for construction and O&amp;M.</p>	<p>No change. No federal regulations concerning wasteful, inefficient, or unnecessary consumption of energy resources were identified that are relevant to the Proposed Project. This is supported in the initial study developed by the CPUC for the ELM Project.</p>																																																						
5.7 Geology, Soils, and Paleontological Resources (GEO)																																																									
GEO-1	Table 5.7-2	<p>Geologic Units Along the Proposed Project Alignment</p> <p>In response to pre-filing comment GEO-1, the geologic unit numbers column in this table was removed; however, this edit has resulted in table rows that are identical and redundant. Remove duplicate or redundant rows.</p>	<p><b>Table 5.7-2: Geologic Units Along the CSP Project Alignment</b></p> <table border="1"> <thead> <tr> <th>Project Segment</th> <th>Rock Type</th> <th>Rock Type</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pliocene to Holocene Alluvium and Terrace Deposits</td> <td>Alluvium</td> </tr> <tr> <td>1</td> <td>Pliocene to Holocene Alluvium and Terrace Deposits</td> <td>Alluvium</td> </tr> <tr> <td>2</td> <td>Pliocene to Holocene Alluvium and Terrace Deposits</td> <td>Alluvium</td> </tr> <tr> <td>2</td> <td>Pliocene to Holocene Alluvium and Terrace Deposits</td> <td>Alluvium</td> </tr> <tr> <td>3</td> <td>Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone</td> <td>Sandstone</td> </tr> <tr> <td>3</td> <td>Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone</td> <td>Sandstone</td> </tr> <tr> <td>3</td> <td>Pliocene to Holocene Alluvium and Terrace Deposits</td> <td>Alluvium</td> </tr> <tr> <td>3</td> <td>Pliocene to Holocene Alluvium and Terrace Deposits</td> <td>Alluvium</td> </tr> <tr> <td>3</td> <td>Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone</td> <td>Sandstone</td> </tr> <tr> <td>3</td> <td>Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone</td> <td>Sandstone</td> </tr> <tr> <td>3</td> <td>Primarily Mesozoic Granodiorite and Quartz Monzonite</td> <td>Granodiorite</td> </tr> <tr> <td>3</td> <td>Pliocene to Holocene Alluvium and Terrace Deposits</td> <td>Alluvium</td> </tr> <tr> <td>3</td> <td>Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone</td> <td>Sandstone</td> </tr> <tr> <td>4</td> <td>Pliocene to Holocene Alluvium and Terrace Deposits</td> <td>Alluvium</td> </tr> <tr> <td>4</td> <td>Quaternary Rhyolite and Ash-Flow Tuffs</td> <td>Rhyolite</td> </tr> <tr> <td>5</td> <td>Primarily Mesozoic Granodiorite and Quartz Monzonite</td> <td>Granodiorite</td> </tr> <tr> <td>5</td> <td>Pliocene to Holocene Alluvium and Terrace Deposits</td> <td>Alluvium</td> </tr> </tbody> </table>	Project Segment	Rock Type	Rock Type	1	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium	1	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium	2	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium	2	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium	3	Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone	Sandstone	3	Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone	Sandstone	3	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium	3	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium	3	Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone	Sandstone	3	Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone	Sandstone	3	Primarily Mesozoic Granodiorite and Quartz Monzonite	Granodiorite	3	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium	3	Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone	Sandstone	4	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium	4	Quaternary Rhyolite and Ash-Flow Tuffs	Rhyolite	5	Primarily Mesozoic Granodiorite and Quartz Monzonite	Granodiorite	5	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium
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3	Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone	Sandstone																																																							
3	Primarily Mesozoic Granodiorite and Quartz Monzonite	Granodiorite																																																							
3	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium																																																							
3	Early Proterozoic to Pleistocene Sandstone, Conglomerate, Dolostone, and Mudstone	Sandstone																																																							
4	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium																																																							
4	Quaternary Rhyolite and Ash-Flow Tuffs	Rhyolite																																																							
5	Primarily Mesozoic Granodiorite and Quartz Monzonite	Granodiorite																																																							
5	Pliocene to Holocene Alluvium and Terrace Deposits	Alluvium																																																							
GEO-2	Section 5.7.1.2.4.1	<p>Liquefaction, Owens and Chalfant Valleys</p> <p>This section has been revised to indicate that the Owens and Chalfant valleys underlie portions of Segments 1, 2, 3, and 5, rather than 1, 2, 3, and 4. Revise the PEA to correct this.</p>	<p>5.7.1.2.4.1 Owens and Chalfant Valleys</p> <p>Shallow groundwater is likely to occur in parts of the Owens and Chalfant valleys, particularly in the central portion of the Owens Valley near the Owens River. These areas underlie portions of Segment 1, Segment 2, Segment 3, and Segment 4.</p>																																																						
GEO-3	Section 5.7.1.2.6	<p>Soil Erosion</p> <p>This section indicates that susceptibility of soils to erosion by water along the CSP Project alignment are summarized in Table 5.7-3, and this section refers to water erosions hazard ratings; however, water erosions hazard ratings are not included in Table 5.7-3. The response to pre-filing comment GEO-5 indicated that the hydrologic group classification</p>	<p>5.7.1.2.6 Soil Erosion</p> <p>Susceptibility of soils to erosion by water along the CSP Project alignment are summarized in Table 5.7-3. The hydrologic group classification shown in Table 5.7-3: Mapped Soil Units and Soil Properties, is a measure of infiltration rate and runoff potential. Soil infiltration refers to the ability of the soil to allow water</p>																																																						

ID	PEA Section(s)	Deficiency	Response/Modified Text
		shown in Table 5.7-3 is a measure of infiltration rate and runoff potential and that this is used as a proxy for susceptibility to erosion by water; however, this is not explained in the PEA text. Add water erosions hazard information to Table 5.7-3 or revise the text of the PEA to explain how the water erosion hazards for the CSP Project alignment were determined based on the soil classification information presented in Table 5.7-3.	<u>to move into and through the soil profile. The infiltration rate is a measure of how fast water enters the soil, if the rate is too slow, it can result in surface runoff and erosion in sloping areas; hence this is used as a proxy for susceptibility to erosion by water. Water erosion hazard ratings developed by the United States Department of Agriculture (USDA) utilize Natural Resources Conservation Service (NRCS) Soil Survey Geographic Database (SSURGO) data and assume that vegetative cover has been removed, but soil horizons remain intact. The erosion hazard rating is influenced by slope and soil erosion factor (SSS-2016).</u> Erosion by water is a slight hazard for the majority of mapped soils crossed by the CSP Project alignment. Approximately 3 percent of the mapped soil units within the CSP Project alignment have a moderate erosion hazard; approximately 0.5 percent have a severe or very severe hazard. Soils with higher erosion hazards are generally associated with steeper terrain along the CSP Project alignment.
GEO-4	Section 5.7.2.1.1.1	National Earthquake Hazards Reduction Act of 1977 The numbering of program objectives list was changed and is now off (4replaced by 5). Revise the PEA to correct this.	5.7.2.1.1.1 National Earthquake Hazards Reduction Act of 1977 ... <del>• 4-</del> Developing effective measures to reduce earthquake hazards; <del>• 2-</del> Promoting the adoption of earthquake hazard reduction activities by federal, state, and local governments, national building standards and model building code organizations, engineers, architects, building owners, and others who play a role in planning and constructing buildings, bridges, structures, and critical infrastructure or "lifelines"; <del>• 3-</del> Improving the basic understanding of earthquakes and their effects on people and infrastructure through interdisciplinary research involving engineering, natural sciences, and social, economic, and decision sciences; and <del>• 5-</del> Developing and maintaining the USGS seismic monitoring system (Advanced National Seismic System); the NSF-funded project aimed at improving materials, designs, and construction techniques (George E. Brown Jr. Network for Earthquake Engineering Simulation); and the global earthquake monitoring network (Global Seismic Network).
GEO-5	Section 5.7.4.1.1.1	Impact Analysis, Fault Rupture, Seismically Induced Liquefaction and Landslides This section indicates that the project "...would be designed consistent with CPUC GO 95, Rules for Overhead Line Construction, to withstand wind, temperature, and wire tension loads. Accounting for these factors would result in a design that would be adequate to withstand expected seismic loading, and therefore impacts due to strong seismic ground shaking would be less than significant." Pre-filing comment GEO-9 indicated that it is not clear how designing for wind, temperature, and wire tension loads would also account for seismic loads and potential for displacement between poles due to fault creep or fault rupture, and that the PEA should provide more detail on how seismic hazards are accounted for in the project design to ensure the project would not be damaged by seismic hazards. The response to pre-filing comment GEO-9 indicated that seismic hazards are accounted for in the project design through the consideration of installing flexible bus connections, incorporating slack in cables, and constructing pile foundations; however, this explanation was not included in the PEA text. Revise the PEA to incorporate this information and explain when and where flexible bus connections, incorporating slack in cables, and constructing pile foundations would be incorporated into the design. Construction of pile foundations could have implications for the analysis of other resource topics (e.g., paleontology, air quality, greenhouse gas emissions).	5.7.4.1.1.1 Construction ... Even though the CSP Project is located in an area susceptible to earthquake forces, the subtransmission infrastructure involved would not be used for human occupancy and would be designed consistent with GO 95, Rules for Overhead Line Construction, to withstand wind, temperature, and wire tension loads. <u>In addition, seismic hazards are accounted for in the project design through the consideration of installing flexible bus connections, incorporating slack in cables, and constructing pile foundations. The location where such features would be located would be determined during final engineering and such features would be constructed and or installed at the time of construction.</u> Accounting for these factors would result in a design that would be adequate to withstand expected seismic loading, and therefore impacts due to strong seismic ground shaking would be less than significant. Implications arising from the construction of pile foundations on other resources are addressed in the applicable sections of the PEA.
GEO-7	Section 5.7.4.1.3.1	Impact Analysis, Unstable Soil, Liquefaction and Landslides This section starts off by indicating that the CSP Project would not cause any geologic unit or soil to become unstable;	The CSP Project would not cause any geologic unit or soil <u>unit</u> to become, <u>in toto</u> , unstable.

ID	PEA Section(s)	Deficiency	Response/Modified Text
		however, it goes on to describe how the project includes activities that could result in landslides or rockfalls. Revise the PEA to address this discrepancy.	
5.8 Greenhouse Gases (GHG)			
		See Air Quality above.	No GHG-related items presented in Air Quality-related comments above; no changes necessary.
5.9 Hazards and Hazardous Materials (HAZ)			
HAZ-1	Section 5.7.4.1.3.1	Impact Analysis, Unstable Soil, Liquefaction and Landslides The response to pre-filing comment HAZ-1 indicated that blasting has been omitted from the revised CSP PEA document; however, blasting is still included as a construction activity that could trigger rockfalls in Section 5.7.4.1.3.1. Revise the PEA to address this discrepancy.	5.7.4.1.3.1 Construction ... Construction activities may result in small, localized, on- and off-site rockfalls from the disturbance of existing surficial rock during drilling, <del>blasting</del> , or other excavation and pole installation activities; such rockfalls would occur in areas that would be closed to the public during construction, are uninhabited, and where non-project structures are generally not present.
HAZ-3	Sections 5.9.1, 5.9.1.1, and 5.9.4.1.2.1	Environmental Setting, Hazardous Materials Report, and Release of Hazardous Materials into the Environment Pre-filing comment HAZ-2 indicated that the <i>Environmental Setting</i> (now Section 5.9.1) identified that past land uses along the proposed project alignment included mining, mineral prospecting and processing, and agriculture; and light industrial uses are found in the western portion of Segment 3 near Laws. Railroad tracks and a historic railroad depot are also present near proposed pole locations in the town of Laws (though the section does not describe this historic railroad use). These types of land uses may have resulted in contamination of soil or groundwater with hazardous materials. Additionally, soil and groundwater surrounding the base of existing utility poles could be contaminated with hazardous materials from wood preservatives (e.g., arsenic, pentachlorophenol, and polycyclic aromatic hydrocarbons [PAHs]) that may have been applied to/leached out of the existing poles. Per the CPUC's PEA Checklist, a Phase I Environmental Site Assessment (ESA) or similar hazards report is required for the proposed project area, and should be included as an appendix to the PEA. The response to pre-filing comment HAZ-2 indicated the following: "Printouts of results from public database queries are included in Appendix F, Environmental Data Resources Report...As discussed during the January 30, 2020 meeting between SCE, the CPUC, and its consultant, SCE has not included an ESA with the PEA." Section 5.9.1.1 describes the review of State and federal databases for hazardous materials and waste sites, and indicates that the reviewed records indicate hazardous materials are not present within or immediately adjacent to the CSP Project alignment. However, based on the past land uses along the proposed project alignment described in Section 5.9.1, there is the potential for previously unidentified hazardous materials impacts to be present in soil and groundwater in areas of the CSP Project alignment (e.g., areas that were previously used for mining, mineral prospecting and processing, agriculture, railroad tracks, and a historic railroad depot) and for impacts from wood preservatives (e.g., arsenic, pentachlorophenol, and PAHs) to be present in soil at the base of existing poles. The review of State and federal databases for hazardous materials and waste sites presented in the PEA does not address the potential for previously unidentified hazardous materials impacts to be present due to these past land uses. A Phase I ESA or similar report would need to be prepared to identify areas of the CSP Project alignment where contamination could potentially be encountered based on past land uses, and describe the types of contaminants that could be encountered. For example, there is an area in the eastern portion of Segment 3 (northeast of Segment 5) where the project alignment intersects an area with several mine shafts and mine tailings piles, which could be impacted with elevated concentration of heavy metals, and there is the existing power pole located adjacent to a mine tailings pile in this area. Some contaminants are not identifiable through visual inspection (e.g., heavy metals and pesticides); therefore, the	A Phase I ESA has not been developed; SCE obtains Phase I ESAs as part of real estate transactions (i.e., purchases of property) and does not obtain Phase I ESAs in support of work along existing alignments. SCE has performed a search of databases to identify the presence of Cortese List sites in support of the impact analysis.  A Soil Management Plan will be developed for the CSP Project and submitted to the CPUC for its use during the CEQA process.

ID	PEA Section(s)	Deficiency	Response/Modified Text
		Soil Management Plan (SMP) described in APM HAZ-2 and referred to in Section 5.9.4.1.2.1 should require protocols for testing/screening of soil in areas where potential contamination may be present that can't be identified visually to ensure that construction workers would not be exposed to hazardous materials and to ensure that contaminated soil, if present, is appropriately managed so that hazardous materials would not be released into the environment.	
HAZ-7	Section 5.9.4.1.2 and APM HAZ-2	<p>Applicant Proposed Measures, HAZ-2: Prepare a Soil Management Plan</p> <p>Section 5.9.4.1.2 indicates "A low potential exists for contaminated soil to be encountered during excavation or other ground disturbing activities, and thus the risk of hazards to the public, workers, and the environment from the release of such materials would be less than significant." As discussed in Deficiency # HAZ-3 above, the PEA does not address the potential for previously unidentified hazardous materials impacts to be present along the CSP Project alignment. A Phase I ESA or similar report is needed to identify areas of the CSP Project alignment where contamination could potentially be encountered based on past land uses, and describe the types of contaminants that could be encountered.</p> <p>Pre-filing comment HAZ-14 indicated that some contaminants (e.g., heavy metals and pesticides) cannot be identified by visual observation; therefore, it is recommended that APM HAZ-2 require that soil sampling and analysis be performed prior to disturbance of soil in areas of potential contamination identified in a Phase I ESA, and the SMP should include soil management requirements based on the soil testing results.</p> <p>The response to pre-filing comment HAZ-14 indicates that the SMP will be addressed at a later time. Revise the PEA to describe how the potential for previously unidentified hazardous materials impacts to be present along the CSP Project alignment would be addressed (for example, through further investigation that would be performed as part of APM HAZ-2).</p>	See response to ID HAZ-3.
5.10 Hydrology and Water Quality (HWQ)			
HWQ- 1	Section 5.10.1.3	<p>Groundwater Resources</p> <p>The description of each basin in the PEA is limited to an overview of the basin that lacks sufficient details. Provide a discussion of total groundwater basin area and storage, depth, etc. for each groundwater basin.</p>	<p>5.10.1.3 Groundwater Basin</p> <p>Groundwater resources (basins) are delineated by the CDWR. A basin is defined as an alluvial aquifer or a stacked series of alluvial aquifers with reasonably well-defined boundaries in a lateral direction and having a definable bottom. Groundwater in the region is used for agricultural and urban supply, particularly in drought years. Aquifers range from large extensive alluvial valleys with thick multilayered aquifers and aquitards to small inland valleys (DWR 2003). Depth to groundwater along the CSP Project alignment ranges considerably, from the surface to more than 600 feet towards the northern portion of the alignment.</p> <p>5.10.1.3.1 Fish Lake Valley Groundwater Basin</p> <p>The Fish Lake Valley Groundwater Basin underlies a northwest-trending valley located in the eastern parts of Mono and Inyo counties. The basin is bounded by the White Mountains on the west, the Sylvania Mountains on the south, and the California-Nevada state line on the north and east. Fish Lake Valley and its underlying groundwater system extend into Nevada. The California portion of the valley is drained by Cottonwood Creek and several other washes, which drain the White Mountains on the west side of the basin. These washes flow eastward through the valley and eventually into Nevada. <u>The Basin covers 48,100 acres, has a storage capacity of 320,000 acre-feet, and contains groundwater at depths from 45 to 88 feet.</u></p> <p>5.10.1.3.2 Owens Valley Groundwater Basin</p> <p>The Owens Valley Groundwater Basin is a relatively narrow and long north-south trending basin that extends approximately 125 miles from Benton Valley in southeastern Mono County to Haiwee in southwestern Inyo County. The basin underlies Benton, Hammil, and Chalfant valleys in Mono County and underlies Round Valley and Owens Valley in Inyo County. The basin is bound by impermeable rocks of the Benton Range on the north, the Coso Range on the south, the Sierra Nevada on the west, and the White</p>

ID	PEA Section(s)	Deficiency	Response/Modified Text
			<p>and Inyo Mountains on the east. The numerous valleys overlying the basin are drained by several creeks to the Owens River, which flows southward to Owens (Dry) Lake, a closed drainage depression in the southern part of the Owens Valley. <u>The Basin covers 661,100 acres, has a storage capacity estimated between 20 and 35 million acre-feet, and contains groundwater at depths from 0 to 1,200 feet.</u></p> <p>5.10.1.3.3 Deep Springs Valley Groundwater Basin The Deep Springs Valley Groundwater Basin underlies an elongate northeast-trending intermontane valley in northeastern Inyo County. The basin is surrounded by impermeable Cambrian marine deposits and Pre-Tertiary granitic rocks of the White and Inyo mountains. The Deep Springs Valley is a closed basin where the surrounding mountains drained by Crooked, Wyman, Birch, and Payson Canyon Creeks terminate at Deep Springs Lake. <u>The Basin covers 29,900 acres, has a storage capacity of 740,000 acre-feet, and contains groundwater at depths from 0 to 260 feet.</u></p>
HWQ- 3	Section 5.10.4.1.6.1	Alter Drainage Patterns in a Manner That Would Impede or Redirect Flows During Construction Provide specific details related to the storage of equipment within the 100-year floodplain, including location and specific measures to reduce impacts from placement of equipment within the floodplain.	No change made. No equipment would be stored with the 100-year floodplain.
5.11 Land Use (LU)			
LU-1	Section 5.11.1.2	Special Land Uses Provide milepost information so that the reader can easily pinpoint the areas where the Proposed Project could affect special land uses.	Special Land Use areas shapefile provided under separate electronic cover.
LU-2	Section 5.11.1.2.5	Table 5.11-1. Land Use and Zoning Designations Pre-filing comment LUP-5 requested that information related to Inyo County Airport Land Use Commission be included in Table 5.11-1 or discussed in a separate section. The applicant responded that this information is addressed in Sections 5.9 and 5.13.  Although the requested information is relevant to the discussion of hazards, hazardous materials, and public safety (Section 5.9) and noise (Section 5.13), the Inyo County ALUC has land use and planning jurisdiction within the area of the airport facilities. Provide cross-references to the requested information in Sections 5.9 and 5.13, which is relevant to the analysis of “conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.” The reader needs to be directed to applicable information if it is located in another section/chapter.	5.11.1.2.5 County and City Land Use and Zoning Designations The Land Use and Zoning designations for parcels crossed by the CSP Project alignment are presented in Table 5.11-1 below. <u>Information regarding the Inyo County Policy Plan and Airport Comprehensive Land Use Plan (CLUP) is provided in Sections 5.9 and 5.13.</u>
LU-3	Section 5.11.2.1.1.2	BLM Bishop Resource Management Plan Pre-filing comment LUP-7 requested clarification about land use decisions relevant to the Owens Valley and Benton Management Areas. Although the requested information may be provided elsewhere in project documents such as the Plan of Development, the PEA should contain information that is relevant to the analysis of “conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.”	No change.  The Bishop Resource Management Plan is not adopted “for the purpose of avoiding or mitigating an environmental effect” (underlining added for emphasis) and thus it is not discussed in this section. SCE has completed a consistency analysis that illustrates the CSP Project would not conflict with the Bishop Resource Management Plan; it is attached at the end of this document.
5.12 Mineral Resources (MR)			
		No comments at this time.	
5.13 Noise (NOI)			
NOI-1	Section 5.3.1.1	Sensitive Receptors There are some duplicates for the definition of sensitive receptors from the Mono County General Plan (Residential areas, Hospitals, Convalescent homes and facilities, schools, and libraries). Delete duplicates from the list or explain why there are duplicates in this list.	5.13.1.1 Noise Sensitive Land Uses The CSP Project is located in unincorporated Inyo County and unincorporated Mono County. Project-related construction activities would occur mainly in open space areas. However, some Project activities would be conducted in the vicinity of rural residences located near the existing subtransmission lines. Existing noise sources in proximity to these potentially noise-sensitive receptors include community noise,

ID	PEA Section(s)	Deficiency	Response/Modified Text
			<p>roadway and highway noise, and airport noise.</p> <p>The definition of a sensitive receptor varies by jurisdiction; for the purposes of this analysis, sensitive receptors include those defined in the Mono County General Plan, Noise Element:</p> <ul style="list-style-type: none"> <li>• <del>Residential areas</del></li> <li>• <del>Hospitals, convalescent homes and extended care facilities</del></li> <li>• <del>Schools</del></li> <li>• <del>Libraries</del></li> <li>• <del>Daycare centers, and other similar land uses.</del></li> <li>• Residential areas</li> <li>• Hospitals</li> <li>• Convalescent homes and facilities</li> <li>• Schools</li> <li>• Libraries</li> <li>• Community centers</li> <li>• Certain recreational areas and parks</li> <li>• Popular visitor destinations and cultural resource sites</li> <li>• Certain natural areas and sensitive habitat areas and other similar land uses</li> </ul>
5.14 Population and Housing (POP)			
POP-1	Section 5.14.4.3	<p>Work Force</p> <p>Provide justification as to personnel that may work on the CSP Project and who currently reside within the impact area is unknown and unknowable.</p> <p>Section 5.17.4.1.2.1 states “As presented in Chapter 3 – Project Description, SCE anticipates that construction of the CSP Project would take approximately 33 months, and that up to 100 workers could be working along the CSP Project alignment on any given day. SCE anticipates that its own crews or specialty electrical contractors would be used for this work. The short duration of the construction period would not trigger the creation of any new employment positions—SCE crews and contractor crews are currently employed and utilized on projects across the broader region.”</p> <p>Revise the PEA to resolve these two seemingly conflicting statements.</p>	<p>No change necessary. Statements are not conflicting. The CSP Project has not been approved by those agencies with jurisdiction. Therefore, the construction of the CSP Project has not been put out to bid by SCE. Until such time as a construction contractor is hired by SCE, the permanent residency of any worker is unknown and unknowable.</p>
5.15 Public Service (PUB)			
PUB-1	Section 5.15.1.1.2	<p>Emergency Response Times</p> <p>Pre-filing comment PUB-1 requested the documented performance objectives and data on existing emergency response times for service providers in the area (e.g., police and fire department response times); however, this comment was not addressed. Provide the requested information or provide a reasoning for why this data is not available.</p>	<p>Data is not provided because it is not available electronically.</p>
5.16 Recreation (REC)			
		<p>No comments at this time.</p>	<p>No response.</p>
5.17 Transportation (TRA)			
TRA-1	Section 5.17.4.1.2	<p>Vehicle Miles Traveled</p> <p>The PEA does not provide enough details regarding VMT from the proposed project. Revise section 5.17.4.1.2 to include the following CPUC PEA Checklist requirements:</p> <ul style="list-style-type: none"> <li>▪ Identify whether the project (or any portion therein) is within 0.5 mile of a major transit stop or a high-quality</li> </ul>	<p>No change. This information is provided in Section 5.17.4.2 as directed in the Guidelines.</p>



ID	PEA Section(s)	Deficiency	Response/Modified Text
		<p>transit corridor.</p> <ul style="list-style-type: none"> <li>▪ Identify the number of vehicle daily trips that would be generated by the project during construction and operation by light duty (e.g., worker vehicles) and heavy-duty vehicles (e.g., trucks).</li> <li>▪ Provide the frequency of trip generation during operation.</li> <li>▪ Quantify VMT generation for both project construction and operation.</li> <li>▪ Provide an excel file with the VMT assumptions and model calculations, including all formulas and values.</li> <li>▪ Evaluate the project VMT relative to the average VMT for the area in which the project is located.</li> </ul>	
5.18 Tribal Cultural Resources (TCR)			
5.19 Utilities and Service Systems (USS)			
USS-1	Section 5.19.1.3	<p>Approved Utility Projects</p> <p>The text states that “SCE is not aware of any utility projects that have been approved for construction within the project ROW but that have not yet been constructed.” However, the applicant’s response to pre-filing comments USS-9 and USS-11 states that “Utility projects that have been approved for construction within the project ROW are included in Section 7.1, Cumulative Impacts.”</p> <p>Provide a list of utility projects that have been approved for construction within the project ROW.</p>	<p>5.19.1.3 Approved Utility Projects</p> <p><del>The approved utility projects located within the project ROW are presented in Table 7.1-1: Cumulative Projects within 2 Miles. SCE is not aware of any other utility projects that have been approved for construction within the project ROW. but that have not yet been constructed.</del></p>
USS-3	Section 5.19.2.1.3.3	<p>Mono County General Plan</p> <p>Pre-filing comment USS-10 requested that goals and policies relevant to the CSP Project from the Mono County General Plan be included. The applicant responded that “The PEA text has been modified accordingly.”</p> <p>No goals or policies from the Mono County General Plan were added to the text of the PEA. Provide this information.</p>	<p>No relevant policies were identified. Therefore, no modifications were made to the text of the PEA.</p>
USS-4	Section 5.19.4.1.1.1	<p>Construction Impacts That Would Result in the Relocation or Construction of New Facilities (third paragraph)</p> <p>Pre-filing comment USS-15 requested information about proposed construction activities and phasing to avoid power shutdown during construction. The applicant responded that “No existing infrastructure needs to be relocated beyond that described in the Project Description...”</p> <p>Revise the text to acknowledge and describe relocation of existing electrical infrastructure or cross-reference the discussion in the Project Description.</p>	<p>No change needed.</p> <p>As indicated in the Project Description, no relocation of existing electrical infrastructure is associated with the CSP Project.</p>
USS-5	Section 5.19.4.2-5.19.4.5	<p>Impact Analysis Section Numbering and Headings</p> <p>Section 5.19.4.1, Impact Analysis, contains the analysis of impacts based on CEQA Guidelines significance criteria and CPUC additional criteria. The CPUC PEA Checklist identifies information to be included in the analysis of each impact; this information is mistakenly numbered to follow the impact analysis, rather than being included within it. For example, Section 5.19.4.2, Utility Relocation, contains information that should be included in Section 5.19.4.1.1 related to impacts of utility relocation. Restructure these sections (now numbered 5.19.4.2-5.19.4.5) accordingly.</p>	<p>No change to be made. SCE followed the numbering sequence provided in the Guidelines.</p>
5.20 Wildfire (WF)			
WF-6	Section 5.20.1.5	<p>Evacuation Routes</p> <p>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.</p>	<p>5.9.4.1.6.1 Construction</p> <p>...</p> <p>Although it is not anticipated that construction activities would result in the blockage of any roadways (including U.S. 395 and U.S. 6, which are identified as evacuation routes <u>in the Mono County Emergency Operations Plan (EOP)</u>) 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.</p>

ID	PEA Section(s)	Deficiency	Response/Modified Text
			<p>5.20.2.1.3 Local  <del>Please see Sections 5.7.2, 5.9.2 and 5.10.2.</del>  <u>5.20.2.1.3.1 Inyo County Emergency Operations Plan</u>  <u>The Emergency Operations Plan describes how Inyo County will prepare for and respond to operational area emergencies and disasters. The plan establishes the necessary emergency management organization and assigns functions and tasks consistent with California's Standardized Emergency Management System and the National Incident Management System. This plan provides for the integration and coordination of planning efforts of the County/Operational Area with those of its city, special districts and the state region. These plans are implemented to avoid creating hazards to aviation and protect the lives and property of nearby residents and other occupants and involve the creation of airport hazard overlay districts for seven airports located in Inyo County.</u></p> <p><u>5.20.2.1.3.2 Mono County Emergency Operations Plan</u>  <u>The Mono County Emergency Operations Plan plan establishes the emergency organization, assigns tasks, specifies policies and general procedures, and provides for coordination of the duties of the County; the duties of other organizations; and both response and recovery procedures. This plan builds upon previous efforts to enhance capabilities and includes the critical elements of the Standardized Emergency Management System, the National Incident Management System, and the Incident Command System.</u></p>
WF-8	Section 5.20.4.1.3	<p>Potential for Project Construction to Exacerbate Wildfire Risks</p> <p>The PEA states, "No components of the CSP Project are designed for human occupancy, therefore no impacts would occur", however, the project area is near and, in some cases, adjacent to occupants. This question was misinterpreted, since wildfires can easily spread outside the work area into inhabited areas.</p> <p>Provide a fire behavior analysis in order to answer the question of where a fire would spread. The output of the analysis will need to be typical fire spread or spread ROS, into adjacent Wildland-Urban Interface areas.</p>	<p>The quoted text is not found in the referenced section, it is found in Section 5.20.4.1.2. and 5.20.4.2.2. To the commenter's point, the CEQA impact question is written as follows:</p> <p>5.20.4.1.2 Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?</p> <p>The question asks if project occupants would be exposed to exacerbated wildfire risks as a result of the Project. The question focuses on "project occupants". There are no occupants of the project, and therefore there is no impact under this criterion. Therefore, the presence or proximity of occupants of non-Project structures or residences is not analyzed under this CEQA criterion.</p> <p>The analysis of potential impacts to occupants of non-CSP Project structures is addressed in Section 5.9.4.1.7, which analyzes if the Project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.</p> <p>Per the direction of the CPUC, a fire behavior analysis will be developed for the CSP Project.</p>
WF-9	Section 5.20.4.1.3	<p><b>Potential for Installation or Maintenance of Infrastructure That May Exacerbate Fire Risk</b></p> <p>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</p>	<p>The key terminology in the CEQA criterion is "associated". There is no "associated" infrastructure; all infrastructure is necessary and included in the Project Description. Therefore, the CSP Project does not require the installation or maintenance of associated infrastructure because there is no associated infrastructure, and thus there is no impact under this criterion.</p> <p>That access road rehabilitation may result in the creation of a fuel break is wholly ancillary and unnecessary to the purpose of the road rehabilitation; that the access road may now be determined to be a fuel break is the CPUC determining the presence of "associated" infrastructure.</p>

ID	PEA Section(s)	Deficiency	Response/Modified Text
		<p>perform a quantitative analysis and should be included here.</p> <p>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 reductions in the occurrence, spread and damage may be. See also Deficiency #3-28 above.</p>	
WF-10	Section 5.20.4.2	<p>Fire Behavior Modeling</p> <p>This question is mis-interpreted. No fire behavior modeling was conducted because the PEA assumes it was meant to focus on only structures and built facilities. However, this question is part of the wildfire section, and wildfire behavior modeling is required as discussed above.</p>	<p>The CPUC Guidelines state: 5.20.4.2: Fire Behavior Modeling. For any new electrical lines, provide modeling to support the analysis of wildfire risk.</p> <p>No new electrical lines are proposed under the CSP Project. The CSP Project involves two existing electric lines in a given corridor; at the completion of the CSP Project, these existing electric lines will be rebuilt in the same given corridor. Therefore, the electric lines are not 'new' (i.e., greenfield) lines.</p>
WF-11	Figure 5.20-2	<p>Wildland Urban Interface</p> <p>These maps are not interpreted in the text. Does this relate to potential impacts? The designations on the maps are not used in the analysis, or useful in analyzing significance. An analysis should use wildfire threats (rate of fire spread, flame lengths, fireline intensity, or combination thereof) overlaid with the population density data. Provide additional descriptions in the text and total acres of project areas in each category.</p>	<p>This figure is provided as per the requirement in the CPUC Guidelines Section 5.20.1.1(a).</p>
5.21 Cumulative Impacts (CI)			
		No comments at this time.	No response.

**Table 5.4-2: Natural Communities and Land Cover Types Mapped within the CSP Project Alignment**

Vegetation Alliance	Vegetation Association	Area Mapped on CSP Project Alignment (acres)	Area Mapped within Anticipated Work Areas (acres)	California State Rarity Ranking
<b>Woodland Forest Vegetation</b>				
Bristlecone Pine Woodland	<i>Pinus longaeva</i> Association	22.9	14.4	<b>S2</b>
Aspen Groves	<i>Populus tremuloides</i> - <i>Pinus longaeva</i> Provisional Association	4.6	3.4	<b>S3</b>
Limber Pine Woodland	<i>Pinus flexilis</i> - <i>Pinus longaeva</i> Provisional Association	2.3	1.8	<b>S3</b>
Goodding's Willow – Red Willow Riparian Woodland and Forest	<i>Salix laevigata</i> Association	0.3	0.2	<b>S3</b>
Singleleaf Pinyon Woodland	<i>Pinus monophylla</i> – ( <i>Juniperus osteosperma</i> ) / <i>Artemisia tridentata</i> (subsp. <i>vaseyana</i> ) Association	186.3	113.3	S4
<b>Total Acres Woodland Vegetation</b>		<b>216.5</b>	<b>133</b>	
<b>Shrubland Vegetation</b>				
Water Birch Thicket	<i>Betula occidentalis</i> / <i>Salix</i> spp. Association	1.6	1.3	<b>S3</b>
Curl Leaf Mountain-mahogany Scrub	<i>Cercocarpus ledifolius</i> – <i>Artemisia tridentata</i> subsp. <i>vaseyana</i> Association	24.2	16.8	<b>S3</b>
Winterfat Scrubland	<i>Krascheninnikovia lanata</i> Association	3.2	1.1	<b>S3</b>
Spiny Menodora Scrub	<i>Menodora spinescens</i> - ( <i>Ephedra nevadensis</i> ) Association	8.3	2.7	<b>S3</b>
Utah Serviceberry – Birch Leaf Mountain Mahogany – Small Leaf Mountain Mahogany Scrub	<i>Philadelphus microphyllus</i> var. <i>microphyllus</i> Provisional Association	2	0.7	<b>S3</b>
	<i>Cercocarpus intricatus</i> Association	3.8	2.7	<b>S3</b>
Fremont's and Nevada Smokebush Scrub	<i>Psoralea arborescens</i> - <i>Sarcobatus baileyi</i> Provisional Association	10.9	0	<b>S3</b>
	<i>Psoralea arborescens</i> Provisional Association	107.2	19.2	
	<i>Psoralea polydenius</i> - <i>Atriplex confertifolia</i> Provisional Association	2.7	0.1	
	<i>Psoralea polydenius</i> Provisional Association	8	0.1	
Red-osier Dogwood - Interior Rose - Currant Thickets	<i>Rosa woodsii</i> Association	2.4	1.8	<b>S3</b>
Arroyo Willow Thickets	<i>Salix lasiolepis</i> Association	53.8	35.5	<b>Yes<sup>2</sup></b>
	<i>Salix lasiolepis</i> / <i>Rosa woodsii</i> / mixed herbs Association	0.5	0.4	<b>S3</b>
Greasewood Scrub	<i>Sarcobatus vermiculatus</i> Association	95.5	18.2	S3S4
	<i>Sarcobatus vermiculatus</i> - <i>Atriplex confertifolia</i> Association	5.2	0	S3S4
Blackbrush Scrub	<i>Coleogyne ramosissima</i> Association	13.1	6	S4, <b>Yes<sup>2</sup></b>

**Table 5.4-2: Natural Communities and Land Cover Types Mapped within the CSP Project Alignment**

Vegetation Alliance	Vegetation Association	Area Mapped on CSP Project Alignment (acres)	Area Mapped within Anticipated Work Areas (acres)	California State Rarity Ranking
Antelope Bitterbrush – Big Sagebrush Scrub	<i>Purshia tridentata</i> var. <i>glandulosa</i> - <i>Artemisia tridentata</i> (subsp. <i>vaseyana</i> ) Association	19.4	11.8	S4, Yes <sup>2</sup>
Cheesebush - Sweetbush Scrub	<i>Ambrosia salsola</i> Association	87.6	32.2	S4
	<i>Ambrosia salsola</i> - <i>Atriplex canescens</i> Provisional Association	22.5	11.3	S4
	<i>Ambrosia salsola</i> - <i>Atriplex confertifolia</i> Association	1.5	0.8	S4
Shadscale Scrub	<i>Atriplex confertifolia</i> Great Basin Association	57.6	9	S4
	<i>Atriplex confertifolia</i> - <i>Ephedra nevadensis</i> Association	3.3	2.9	S4
	<i>Atriplex confertifolia</i> – <i>Krascheninnikovia lanata</i> Association	17.8	10.9	Yes <sup>2</sup>
	<i>Atriplex confertifolia</i> - <i>Psoralea arborescens</i> Provisional Association	12.6	2.6	Yes <sup>2</sup>
	<i>Atriplex confertifolia</i> - <i>Menodora spinescens</i> Provisional Association	1.2	0	S4
Quailbush Scrub	<i>Atriplex lentiformis</i> Association	51	15.4	S4
	<i>Atriplex lentiformis</i> - <i>Ericameria nauseosa</i> Provisional Association	2.5	0	
Allscale Scrub	<i>Atriplex polycarpa</i> Association	21	11.9	S4
Nevada Joint fir - Anderson's Boxthorn - Spiny Hopsage Scrub	<i>Ephedra nevadensis</i> Provisional Association	116.4	56.5	S4
	<i>Ephedra nevadensis</i> - <i>Psoralea arborescens</i> Provisional Association	3.1	0	S4
Fourwing Saltbush Scrub	<i>Atriplex canescens</i> Association	78.4	27.8	S4
	<i>Atriplex canescens</i> Desert Wash Association	8.2	0	S4
	<i>Atriplex canescens</i> - <i>Psoralea arborescens</i> Provisional Association	0.6	0.4	S4
Needleleaf Rabbitbrush Scrub	<i>Ericameria teretifolia</i> Association	24.3	14.3	S4
Sandbar Willow Thickets	<i>Salix exigua</i> Association	35.9	24.3	S4
	<i>Salix exigua</i> - ( <i>Salix gooddingii</i> ) Provisional Association	1.9	0	S4
Big Sagebrush Scrub	<i>Artemisia tridentata</i> Association	8.3	7.1	S5
Mountain Big Sagebrush Scrub	<i>Artemisia tridentata</i> subsp. <i>vaseyana</i> Association	405.2	259.5	S4
	<i>Artemisia tridentata</i> subsp. <i>vaseyana</i> – <i>Purshia tridentata</i> Association	8.4	3.3	S4
California Buckwheat Scrub	<i>Eriogonum fasciculatum</i> Association	12.3	8.2	S5
Rubber Rabbitbrush Scrub	<i>Ericameria nauseosa</i> Association	115.5	49.6	S5

**Table 5.4-2: Natural Communities and Land Cover Types Mapped within the CSP Project Alignment**

Vegetation Alliance	Vegetation Association	Area Mapped on CSP Project Alignment (acres)	Area Mapped within Anticipated Work Areas (acres)	California State Rarity Ranking
<b>Total Acres Shrubland Vegetation</b>		<b>1,457.1</b>	<b>666.2</b>	
<b>Herbaceous Vegetation</b>				
Alkali Sacaton - Scratchgrass - Alkali Cordgrass Alkaline Wet Meadow	<i>Muhlenbergia asperifolia</i> - <i>Distichlis spicata</i> Provisional Association	6.1	3.1	S2
Yerba Mansa - Nuttall's Sunflower - Nevada Goldenrod Alkaline Wet Meadows	<i>Anemopsis californica</i> Association	0.1	0	S2
Ashy Ryegrass – Creeping Ryegrass Turfs	<i>Leymus triticoides</i> Association	6.2	4	S3
Hardstem and California Bulrush Marshes	<i>Schoenoplectus acutus</i> Association	0.2	0.1	S3S4, Yes <sup>2</sup>
Salt Grass Flats	<i>Distichlis spicata</i> Association	2.5	1.6	S4
	<i>Distichlis spicata</i> - annual grasses Association	0.5	0.1	S4
Baltic and Mexican Rush Marshes	<i>Juncus arcticus</i> var. <i>balticus</i> – (var. <i>mexicanus</i> ) Association	1.5	1.3	S4
Cattail Marshes	<i>Typha (latifolia, angustifolia)</i> Association	0.3	0.1	S5
	<i>Phragmites australis</i> subsp. <i>americanus</i> Provisional Association	0.6	0.4	S5, Yes <sup>2</sup>
<b>Total Acres Herbaceous Vegetation</b>		<b>17.9</b>	<b>10.7</b>	
<b>Total Acres Native Vegetation</b>		<b>1,691.10</b>	<b>809.8</b>	
<b>Total Acres Non-Native Vegetation</b>		<b>0</b>	<b>0</b>	
<b>Total Acres All Vegetation</b>		<b>1,691.10</b>	<b>809.8</b>	
Active Agriculture		18.3	6.2	None
Ornamental/Landscaped (lawns, gardens)		0.9	0.1	
Open Water (ponds, lakes, streams, rivers)		1.1	0.6	
Developed (towers, roads, etc)		193.2	100	
Disturbed (cleared area supporting ruderal vegetation, if any)		2.3	0.1	
Unvegetated Wash or River Bottom		0.5	0.3	
<b>Total Mapped Acres</b>		<b>1,907.70</b>	<b>917.1</b>	

**Notes:**

1 As of April 2019

2 Included as Sensitive on 2021 CDFW California Sensitive Natural Communities list or with CDFW guidance

**Alliance Rarity Rankings (CDFW 2021, Sawyer et. al 2009):**

S1: Fewer than 6 viable occurrences statewide and/or up to 518 hectares

S2: 6-20 viable occurrences statewide and/or 518-2,590 hectares

S3: 21-100 viable occurrences statewide and/or 2,590-12,950 hectares

S4: Greater than 100 viable occurrences statewide, and or more than 12,950 hectares

S5: Demonstrably secure because of its statewide abundance

## Bishop Resource Management Plan Consistency Analysis



Bishop RMP  
Consistency Analysis.x