October 31, 2024

VIA EMAIL

Ms. Connie Chen
California Environmental Quality Act Project Manager
California Public Utilities Commission Energy Division
505 Van Ness Avenue
San Francisco, California 94201

RE: Supplemental Response #2 to the California Public Utilities Commission's Deficiency Report 1 for the LS Power Grid California, LLC's Collinsville 500/230 kV Substation Project (Application 24-07-018)

Dear Ms. Chen,

As requested by the California Public Utilities Commission (CPUC), LS Power Grid California, LLC (LSPGC) has collected and provided the additional information that is needed to deem the application for Certificate of Public Convenience and Necessity (CPCN) for the Collinsville 500/223 kV Substation Project (Proposed Project) as complete. This letter includes the following attachments that supplement our previous September 31, 2024, and October 15, 2024, responses to CPUC's Deficiency Report 1:

- A Supplemental Response to Deficiency Report Table to Deficiency Report #1, received August 24, 2024:
  - **Attachment A**: Revised Visual Resources Technical Report, including updated simulations and high-resolution photos.
  - **Attachment B**: Collinsville Substation Health Risk Assessment
  - **Attachment C**: Updated Cultural Resources Technical Report, including GIS data
  - **Attachment D**: Substation Fence and Driveway Profile Diagram and fencing information

The attachments outlined above can be downloaded via the following link: LSPGC Supplemental Response to CPUC Deficiency Report 2. Please contact me at (925) 808-0291 or djoseph@lspower.com with any questions regarding this information. If needed, we are also available to meet with you to discuss the information contained in this response.

Sincerely,

Dustin Joseph

Dustin Joseph
Director of Environmental Permitting

Enclosures

cc: Jason Niven (LSPGC)
Doug Mulvey (LSPGC)
Lauren Kehlenbrink (LSPGC)
Clayton Eversen (LSPGC)

David Wilson (LSPGC)
Michelle Wilson (CPUC)
Aaron Lui (Panorama)

Def/DR	Def/DR #	Document	Section / Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
Deficiency	DEF-10	PEA Section 5.1 Aesthetics	Attachment 5.1-A: Visual Technical Report Figure 5.1-12 through Figure 5.1-17	**DEF-10: Visual Simulation Corrections** The proposed project facilities depicted in the visual simulations appear lighter in color than typical facilities (i.e., KOPs 1 and 2). In addition, the elevation of the proposed substation base and facilities appear too low and below the existing grade shown in the baseline image; the engineered/graded substation pad and slopes are not depicted; the 30-foot firebreak surrounding the substation (maintained free of vegetation) is not depicted; and the microwave tower is not depicted. The substation wall and suspended conductor also appear too light and nearly white. The Visual Technical Report should be updated to reflect the requested changes to the visual simulations.	A	Please evaluate and update the facility colors depicted in the visual simulations to include darker (typical galvanized steel color) or provide supporting documentation to demonstrate the lighter gray colors used are accurate, such as photographs of similar existing facilities under similar conditions. Please also evaluate the color of the substation wall and conductor and update the simulations accordingly.	The substation facility colors have been reviewed and the visual simulations revised to ensure that they more accurately reflect the anticipated surface finishes that will be used for the Proposed Project. The revised visual simulations are provided in **Attachment A**.
					B	Please evaluate the position of the substation base elevation as it relates to the existing grade and proposed substation pad and slopes and update the simulations accordingly.	The base elevation of the substation has been adjusted to match the latest grading plan and the visual simulations have been revised accordingly. The revised visual simulations are provided in **Attachment A**.
					C	Please add the following features to the simulations where they would be visible: - Microwave tower - Engineered/graded slopes surrounding the substation - North driveway and access gate - 30-foot firebreak surrounding the substation	The microwave tower and northern access gate are depicted in the revised simulations that have been included in **Attachment A**, as appropriate. From the Stratton Lane key observation point, engineered/graded slopes surrounding the substation, and the firebreak would be obscured by the foreground topography. As a result, these features are not visible in the simulation.
					D	Please update the Visual Technical Report to reflect the requested changes to the simulations.	The visual technical report was revised to ensure the facility impacts are described accurately and is included in **Attachment A**.
Deficiency	DEF-11	PEA Section 5.1 Aesthetics	Attachment 5.1-A: Visual Technical Report Figure 5.1-12 through Figure 5.1-17	**DEF-11: High Resolution Aesthetics Images with Metadata** High resolution images are needed in TIFF format for the existing and simulated condition photos/figures. The TIFF files should include camera metadata information so the camera model and lens information can be reviewed, as well as the date and time taken.	A	Please provide all existing and simulated condition images in high resolution TIFF format with camera metadata.	High resolution images of the revised visual simulations are included under **Attachment A**.
Deficiency	DEF-13	PEA Section 5.3 Air Quality	Section 5.3.4.4, page 5.3-22	**DEF-13: Pittsburg Receptors and HRA** Section 5.3.4.4: Health Risk Assessment states: "Review of Office of Environmental Health Hazard Assessment (OEHHA) guidance (OEHHA 2015) indicates that a Health Risk Assessment is not required for the Proposed Project because it does not include operation of new stationary sources that would result in the emissions of TACs. Proposed Project construction is anticipated to take approximately 26 months, and the nearest sensitive receptor to planned construction activities in Solano County is a group of residences approximately 0.4 mile away. No other sensitive receptors are located within 1,000 feet of the Proposed Project and associated construction areas in Solano County. In Contra Costa County, numerous residences, Marina Community Center, and St. Peter Martyr School would be located adjacent to the proposed LSPGC Telecommunications Line. In addition, multiple residences would be located within approximately 0.1 mile of a staging area located adjacent to PG&E's existing Pittsburg Substation. Construction of this Proposed Project component is anticipated to last approximately 4 months; however, construction would proceed in a generally linear fashion at discrete work areas along the proposed route. As a result, construction at one location is anticipated to last less than the 2-month minimum time for evaluating cancer risks following OEHHA guidance. As a result, a Health Risks Assessment would be performed for the Proposed Project and would be submitted to the CPUC once complete."	A	Please complete a Health Risk Assessment for the project.	The Collinsville Substation Health Risk Assessment is provided in **Attachment B**.
Deficiency	DEF-14	PEA Section 5.4 Biological Resources	Section 5.4.4.1.1, page 74 Section 5.4.4.1.3, page 83	**DEF-14: Water Quality and Turbidity Impacts** Within the special-status aquatic species subsection of Section 5.4.4.1.1, it states that in water project activities (i.e., pile driving, horizontal drilling, trenching) may cause aquatic impacts such as increased turbidity. However, it is not made clear to what extent turbidity is expected to increase (i.e., reasonable/average NTU increase from specific activities), and no associated mitigation measures are referenced in this section. There is also no mention within the PEA of turbidity thresholds for special-status aquatic species. Increased turbidity within aquatic habitat is known to decrease dissolved oxygen and have other deleterious effects on fish species and other aquatic species should be addressed if substantial turbidity increases are expected from project related activity. In a separate response, LSPGC stated: "Sediment dispersion modeling is being conducted to assess whether a monitoring program is needed. The results of the modeling will be provided to the CPUC once complete. The anticipated timeline for completion is the fourth quarter of 2024."	A	Please provide the results of the sediment dispersion modeling. If a sediment monitoring program is proposed, provide the detailed framework and proposed thresholds for consideration.	The results of the sediment dispersion modeling will be supplied to the CPUC once the final report is available. The final report is anticipated to be completed by November 15, 2024.
Deficiency	DEF-17	PEA Section 5.5 Cultural Resources	Attachment 5.5-A: Cultural Resources Technical Report	**DEF-17: GIS Data for Cultural Resources** The survey area and confidential resource location GIS has not been provided, as is required by the checklist.	A	Please provide the cultural resources GIS data for maps in the CRTR (i.e., site/resource boundaries, research/study areas, survey areas, etc.) for both the underwater and terrestrial report data.	GIS data for the maps in the Cultural Resources Technical Report (CRTR) have been provided under **Attachment C**.

Deficiency	DEF-18	PEA Section 5.5 Cultural Resources	Attachment 5.5-A: Cultural Resources Technical Report	**DEF-18: Geoarchaeology Analysis** Project areas adjacent to permanent bodies of water are frequently highly sensitive for buried resources. Near Collinsville and underwater, these resources are mostly likely to be precontact era. Near Pittsburg buried resources may include fill associated with the historic era use of the Project Area as well as deeply buried prehistoric era resources. The information provided by Chronicle does not sufficiently support their argument that the Project Area is low sensitivity. Additional discussion and maps showing buried site sensitivity levels are required, following the standards established by Caltrans, in order to develop appropriate mitigation measures for the project. Buried site sensitivity analyses have been required for multiple projects in southern CA.	A	Please revise the Cultural Resources Technical Report to include the requested buried site sensitivity analysis, including for the urban areas of Pittsburg.	A Built Environment Survey and Assessment Report has been added to the revised CRTR as Attachment F. The revised CRTR is provided under **Attachment C**.
Deficiency	DEF-19	PEA Section 5.5 Cultural Resources	Attachment 5.5-A: Cultural Resources Technical Report	**DEF-19: Architectural Historian Review and Built Environment Survey/Report** An architectural historian was not involved in the inventory. Note: The Transbay Cable had a standalone built environment report, but it has been nearly 20 years since it was prepared, and there may be new resources that have turned 50 years old during that time which may need to be considered. On the Pittsburg side, the project area needs to be surveyed for built environment resources. The built environment surveys should also cover existing PG&E facilities and substations that would be modified by the Proposed Project. In a separate response, LSGPC stated: "Impacts from the proposed LSPGC Telecommunications Line would be underground and temporary in nature within the public ROW; therefore, a built environment assessment is not required." The CPUC must analyze the whole of the project based on evidence. The argument for the lack of survey is not appropriate or sufficient. The nature and severity of any project impacts cannot be identified if a survey has not been conducted and resources identified. This is a Madera decision issue (see DEF-20).	A	Please conduct desktop research examining what resources might be present along the route both below and above ground. In addition, conduct a built environment pedestrian survey of the line to identify potential impacts to built environment resources. The built environment surveys should also cover existing PG&E facilities and substations that would be modified by the Proposed Project for any facilities greater than 50 years in age.	A Built Environment Survey and Assessment Report has been added to the revised CRTR as Attachment F. The revised CRTR is provided under **Attachment C**.
Deficiency	DEF-20	PEA Section 5.5 Cultural Resources	Section 5.5.6.1, page 5.5-26	**DEF-20: Completion of Cultural Resource Surveys and Madera Decision** APM CUL-2 states that "Cultural resource surveys would be performed for any portion of the Proposed Project area not yet surveyed". This measure cannot be implemented as currently written. The Madera decision (Madera Oversight Coalition, Inc. v. County of Madera) concludes that the determination whether a site is a historical resource must be made before certification of the EIR, which means that it must be identified prior to that point as well. In a separate response, LSGPC stated: "Some areas of the Proposed Project will require survey once landowner access is granted. LSPGC will provide the CPUC with updates to the CRTR as any previously unsurveyed areas are surveyed."	A	The application is deficient until the cultural resource surveys are completed for the entire project and resources have been evaluated. Please provide a map showing the areas that have been surveyed and when surveys are anticipated to be complete.	The CRTR was updated with the appropriate information regarding any areas previously not surveyed. All Proposed Project areas have been surveyed at this point. The updated Cultural Resources Technical Report is provided under **Attachment C**.
Deficiency	DEF-21	PEA Section 5.5 Cultural Resources	Attachment 5.5-A: Cultural Resources Technical Report	**DEF-21: Archaeological Resources Management Reports (ARMR) Guidelines** Attachment 3 of the checklist requires that the report meets CA SHPO ARMR Recommend Contents and Format. ARMR guidelines state that this section should include, "An undertaking location map consisting of photocopies of relevant portions of appropriate USGS quadrangles clearly delineating the undertaking boundaries. Indicate the undertaking name, quad name, quad scale, township/range, and sections on each copy."	A	Please include the required map showing the Project Area over USGS quadrangle backgrounds (this should be included in addition to Figures 1-1 through Figure 1-26, which show the APE/API and impact areas over aerial image backgrounds).	The CRTR was updated with the appropriate information regarding this mapping requirement in Figure 1-2a through Figure 1-2c in the terrestrial CRTR. The updated Cultural Resources Technical Report is provided under **Attachment C**.
Deficiency	DEF-23	PEA Section 5.5 Cultural Resources	Attachment 5.5-A: Cultural Resources Technical Report, Section 3.1 Environmental Setting	**DEF-23: Environmental Setting** The text of Section 3.1 mentions that "The geology of the Project area is mapped by Graymer et al. (2002) at a scale of 1:100,000 (Figure 3, Figure 4, and Figure 5)." These maps are not provided. The following valuable information regarding the study area being underwater was provided in response to a prior comment. A portion of the comment content is included in the CRTR, but not all of the information is included. "Relative to the potential for submerged prehistoric sites within the Project APE/API, sea levels were much lower (22,000 to 15,000 years before present [BP]). To the west and downstream of the APE/API, the "California River" and other smaller streams and rivers drained through the "Franciscan Valley" west through the mouth of the Golden Gate channel toward the Farallon Islands, where the water drained into what was then the shoreline of the Pacific Ocean (Meyer and Rosenthal 2007). Sea levels rose and began to flood the lowest portions of the Franciscan Valley floor and most of the continental shelf Between 15,000 and 11,000 years BP. As the waters continued to rise, freshwater marshes began to form and sediments began to accumulate on the floor of the Valley allowing human occupation of the region circa 11,000 B.C. The Suisun Bay and Delta, including the APE/API, may have, at least initially, been exposed. However, sediment deposition and continued tidal flow has likely hid or destroyed evidence of this occupation. Underscoring this point, the APE/API is located in an area of a braided stream with channels that have constantly shifted and truncated any what were then intact paleo-landforms. Subsequently, the area is not conducive for locations that would contain in situ archaeological deposits."	A	Please provide the referenced geology map(s).	The CRTR was updated with the appropriate information regarding the referenced geology maps in Figure 3-1 through Figure 3-2 of the terrestrial CRTR. The updated Cultural Resources Technical Report is provided under **Attachment C**.
					B	Please ensure the underwater description of the study area shown is included in the CRTR setting.	The CRTR was updated with the appropriate information regarding the referenced environmental setting description in Section 3.1 of the maritime CRTR. The updated Cultural Resources Technical Report is provided under **Attachment C**.

Deficiency	DEF-24	PEA Section 5.5 Cultural Resources	Attachment 5.5-A: Cultural Resources Technical Report, 6 Cultural Resource Evaluations	**DEF-24: Cultural Resource Evaluations** Several of the historic era resources are associated with community members who, for example, founded Collinsville. These resources could be eligible under Criteria B/2 at the local level. The current version of the report includes evaluations under criteria 1 and 2 that consistently say: "No evidence was found to link xxx site with a specific event of importance in American history or with a pattern of events making a significant contribution in the development in Solano County, California, or the United States". However, the sources that were checked to form this conclusion were not cited, and the assertion is not supported with the necessary citations. Were historical newspapers and censuses checked? If so, they should be cited. Were the histories cited in the historical context reveal this level of detail? If so, they should be cited.	A	Please revise all of the evaluations to include citations related to historic events and people.	The CRTR was updated with the appropriate information regarding the referenced historical context citations. The updated Cultural Resources Technical Report is provided under **Attachment C**.
Deficiency	DEF-25	PEA Section 5.5 Cultural Resources	Attachment 5.5-A: Cultural Resources Technical Report, 6.7 AG-001	**DEF-25: Structure Identified Near River during Site Visit** During the CPUC site visit a structure was identified next to the river, and potentially within 30 meters of the artifact scatter. Pinon asked to describe this potential resource and conduct historical research to determine its age. If it is older than 50 years, either include it in the AG-001 boundary, or record it separately. In a separate response, JN-01 was added to the report. JN-01 is a different structure than the one noted in the Pinon comment. The structure is immediately adjacent to AG-001, and perhaps a 1/4 mile south of JN-01.	A	Please identify the structure identified by Pinon and respond accordingly. Is the structure 50 years old or older? If so, please record it either as part of AG-001 or as a different site. Please include a statement or discussion on association or negative association between the artifact scatter and the structure.	The CRTR was updated with the appropriate information regarding the referenced structure, and it is described in the discussion of AG-001. The updated Cultural Resources Technical Report is provided under **Attachment C**.
Deficiency	DEF-26	PEA Section 5.5 Cultural Resources	Attachment 5.5-A: Cultural Resources Technical Report, 2.1 Historic Context	**DEF-26: Historic Context – Maritime Use** The following requests were provided previously, and LSPGC stated the report was updated accordingly, but the revisions could not be identified.	A	Please revise this section to discuss the possibility that Collinsville and/or Pittsburg (formerly New York) was a stop during these various historical eras. Or specify a section and page number where this information is provided.	The CRTR includes the appropriate information in the History of Collinsville section of the terrestrial CRTR and Section 3.4.3 Historical Era of the maritime CRTR. The updated Cultural Resources Technical Report is provided under **Attachment C**.
					B	Please explain how the history you are reviewing is relevant to the current project, or specify a section and page number where this information is provided.	The CRTR was updated with the appropriate information in the Historic Overview section of the terrestrial CRTR regarding the relevancy of the history reviewed. The updated Cultural Resources Technical Report is provided under **Attachment C**.
Deficiency	DEF-27	PEA Section 5.5 Cultural Resources	Attachment 5.5-A: Cultural Resources Technical Report 2.1.2 California State Lands Commission Shipwreck Database 2.1.4 Other Shipwreck Sources	**DEF-27: Shipwreck Descriptions** Table 2-1 lists shipwrecks in the vicinity of the APE as identified by this database. Tables 2-3 and 2-4 lists vessels identified in A Map and Record Investigation of Historical Sites and Shipwrecks Along the Sacramento River Between Sacramento City and Sherman Island, as in or near the APE/API. Table 4-1 in Draft 2 is an updated version of Table 2-1 in Draft 1. The table was revised to include information on propulsion and captains, but the information added to the table is highly limited. Vessel dimensions and tonnage columns are included on the table, but most fields are empty, possibly due to lack of information. If information about vessel dimensions and tonnage tends to be limited. Table 4-2 in Draft 2 appears to be the equivalent of Table 2-2 in Draft 1. No revisions to Table 4-2 are apparent. Table 4-3 in Draft 2 is an updated version of Table 2-3 in Draft 1. Table 4-3 includes additional descriptive details and more information in general than table 2-3 in Draft 1, however, additional information about the physical properties of the vessels included in table remains limited.	A	Please state that information about the vessel dimensions, tonnage, and physical properties tends to be limited in the report, where referenced in the tables.	The CRTR was updated with the appropriate information regarding the referenced tables. This information can be found in Section 4.1.2 California State Lands Commission Shipwreck Database and Section 4.1.4 Other Shipwreck Sources in the maritime CRTR. The updated Cultural Resources Technical Report is provided under **Attachment C**.
Deficiency	DEF-28	PEA Section 5.5 Cultural Resources	3.1.2 Remote Sensing Survey Equipment	**DEF-28: Magnetometer** Section 5.1 Draft 2 does not include additional discussion on use of 2 or more magnetometers.	A	Please revise to address this question.	The CRTR was updated with the appropriate information regarding the use of a G-882 magnetometer in Section 5.1.2 Remote Sensing Survey Equipment of the maritime CRTR. The updated Cultural Resources Technical Report is provided under **Attachment C**.

Data Request	DR-4	Application and PEA Chapter 1: Executive Summary Chapter 2: Introduction Chapter 3: Project Description	Section 3.8.4.1.2, page 3-92	**DR-4: Inspection and Maintenance Access to Structures** Section 3.8.4.1.2 states: "…Should structures require direct access during maintenance, overland access consistent with easement access rights and in coordination with the landowner would be utilized…." In a separate response, LSPGC stated "…All maintenance access will be overland travel and may be different than original construction access and dependent on easement access rights with the landowner(s)." During operation and maintenance, structure and line inspections would be required and direct vehicle access to reach the structures is a foreseeable action, which would result in occasional, long-term ground impacts. To minimize impacts to a larger area and potential issues with ground stability, use of overland routes during maintenance should follow the same temporary access road routes used during construction. Further, variable overland roads could result in higher risk for inadvertently impact sensitive resources that may be present. If LSPGC does not commit to using consistent maintenance routes on an as needed basis, whether maintained or not, additional mitigation may be required for such access considerations to minimize potential impacts.	A	Please consider the adoption of permanent overland access routes to demonstrate the likely and least impactful routes that would be used to access structures during operation and maintenance of the project. If this is an acceptable change, the temporary construction access road routes can be considered permanent overland routes for analysis in the EIR.	LSPGC has re-evaluated the need for permanent overland access routes and can confirm that permanent overland access routes for routine operations and maintenance is not necessary. All temporary access roads used during construction will be restored to pre-project conditions (including re-contouring and revegetation). During operations, LSPGC will visually inspect the 230 kV structures from existing roads or through the use of aerial drones. If visual inspections require access to the structures, LSPGC field personnel will walk to the structures as needed.
Data Request	DR-8	Application and PEA Chapter 1: Executive Summary Chapter 2: Introduction Chapter 3: Project Description	Section 3.3.4.1.1, page 3-18 Figure 3-4 and Attachment 3-A: Detailed Route Maps (page 8)	**DR-8: Substation Security Wall/Fence, Access Roads, and Access Gates** Section 3.3.4.1.1 states: "The substation would be surrounded by a prefabricated interlocking security wall that would be 10 feet tall with 1 foot of barbed wire on top. The access gate would open approximately 24 feet wide." No profile diagram or representation was observed in the Project Description or Aesthetics section of the PEA. Attachment 3-A: Detailed Route Maps (page 8) shows two access roads and locations where apparent gates would be installed, one on the north side and one on the east side of the substation. Figure 3-4 shows what appears to be one access point on the north side and no access point on the east side. The location of the microwave tower and other facilities shown on Figure 3-4 appear to conflict with the access roads and gate show on page 8 of Attachment 3-A.	A	Please clarify the locations of proposed substation access roads/driveways and the number of substation gates and their dimensions (if different).	There are two proposed substation access road for the Proposed Project. There is one on the north of the substation, branching off of Stratton Lane to the south. There is one on the east side of the substation for access to the telecommunication yard, branching off of Stratton lane to the west. There is one access gate to the substation and one access gate to the telecommunication yard. The access gates are approximately 24 feet wide.
					B	Please clarify if the substation arrangement shown in Figure 3-4 is out of date and provide a revised version of the figure if the arrangement as changed with new locations for the microwave tower, storage facility, and telecom room, as applicable.	A revised version of Figure 3-4: General Arrangement was provided in our original response to Deficiency Report #1.
					C	Please provide a profile diagram of the proposed substation fence and driveway gates.	LSPGC has provided a profile diagram of the proposed substation fence and driveway gate in **Attachment D**. Also included in **Attachment D** is additional information regarding the Valmont Composite Safefence.
					D	Please provide a description of the typical colors, materials, and finishes of the fence and gate.	As previously provided, the substation security fencing would have a non-reflective finish and neutral earth-tone colors, to the extent commercially available. The access gates would be constructed with a non-reflective dulled grey galvanized steel, to the extent commercially available.
Data Request	DR-12	PEA Section 5.4 Biological Resources	Attachment 5.4-D, page 1	**DR-12: California Tiger Salamander** Designation of Low Potential to occur for California tiger salamander (CTS) is not substantiated based on the project location. Suitable habitat exists within the project area and CNDDB has occurrences between 1 and 5 miles of the project area. CTS are known to be capable of migrating over 1 mile and lack of occurrences closer to the project area may indicate lack of focused surveys conducted in the area and does not necessarily mean that CTS does not occur closer to project area. It is recommended that the potential to occur designation for CTS be reanalyzed and a formal habitat assessment for CTS is conducted using the Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander (USFWS 2003). If suitable habitat is present, protocol surveys may be required according to CDFW and USFWS guidelines. In a separate response, LSPGC stated: "The potential to occur designation for this species in the PEA is consistent with the three California tiger salamander habitat assessments that were conducted for the Solano 4 Wind Project. The study area of these assessments overlaps substantially with the Proposed Project area north of the Delta. These studies (the most recent of which was conducted in 2018) concluded that lack of suitable aquatic habitat, multiple barriers to movement/dispersal, ongoing land use practices, and a lack of suitable burrows contributed to a low potential for occurrence of this species within the Study Area. The reconnaissance-level surveys performed in support of the Proposed Project and the protocol-level assessments previously conducted in the Proposed Project area have consistently supported the "Low Potential" determination in the BRTR and PEA, and no further habitat assessments are necessary. The BRTR and the PEA have been updated to clarify this information." Though the project site does not contain vernal pools, suitable aquatic habitat does exist on the project site, with wetlands present in multiple locations. Studies cited did not overlap completely with the project area.	A	A formal habitat assessment for CTS is required to substantiate the designation of Low Potential to occur, for the reasons described in the comment. If a formal habitat assessment is not completed that demonstrates the species is not present or has Low Potential to occur, the CPUC will consult with CDFW and USFWS to determine if protocol surveys are required, and/or the need for additional mitigation measures and permits.	LSPGC had planned to prepare a formal habitat assessment for CTS. However, a formal habitat assessment requires access to private property that will not be impacted by the Proposed Project, and there is a high probability that access to that property will not be granted. As such, LSPGC will coordinate directly with CDFW and USFWS regarding the need to prepare a formal habitat assessment for CTS. LSPGC will provide CDFW and USFWS with the assessments that have been competed as part of the Proposed Project, and for other projects in that area, and will solicit feedback on the need to complete the formal assessment and the need to conduct protocol surveys. LSPGC will provide the CPUC with the meeting notes and final agency recommendations.

Data Request	DR-13	PEA Section 5.4 Biological Resources	Attachment 5.4-D, page 1	**DR-13: Burrowing Owl** Suitable habitat for burrowing owl exists within the project area and CNDDB has occurrences within 2 miles of the project (less than two miles away east along Talbert Lane and approximately two miles west in Montezuma (2010 and 2011 records)). Lack of occurrences closer to the project area may indicate lack of focused surveys conducted in the area and does not necessarily mean that BUOW does not occur closer. A formal habitat assessment is recommended using the Burrowing Owl Survey Protocol and Mitigation Guidelines (PDF) (The California Burrowing Owl Consortium, 1993) and the Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game, 2012). In a separate response, LSPGC stated: "Two habitat assessments for burrowing owl were conducted within the Proposed Project area in support of the Solano 4 Wind Project. These habitat assessments documented anecdotal SMUD accounts of overwintering owls in the vicinity of Talbert Lane. The conclusions of this habitat assessment are largely consistent with the findings in the PEA and BRTR (i.e., lack of suitable burrows, lack of ground squirrel activity, land is actively managed/disturbed); however, the assessment acknowledges that during periods of inactivity on grazed or farmed land, ground squirrels and other burrowing mammals may re-establish and facilitate the reintroduction of burrowing owls to grassland habitats. The findings of these habitat assessments are sufficient to revise the potential-to-occur determination for burrowing owl to moderate for nesting owls and high for overwintering owls. Further, given that a habitat assessment for burrowing owls was recently conducted within a substantial portion of the Proposed Project area, a second assessment is not deemed necessary to support this potential-to-occur determination. The BRTR and PEA potential-to-occur discussions have been adjusted and species profiles added/updated as appropriate. In addition, recommendations for protocol-level surveys have been included in the BRTR, as appropriate. Lastly, an additional impact discussion related to burrowing owl has been added to the PEA, including an APM addressing surveys and avoidance." A formal habitat assessment for burrowing owl over the full project area is still recommended, especially considering that the last habitat assessment was six years ago. Additionally, the East Contra Costa County HCP requires planning surveys for burrowing owl habitat prior to applying for coverage and preconstruction surveys for burrowing owl (if suitable habitat is identified).	A	An updated formal habitat assessment for burrowing owl is required. The CPUC will consult with CDFW regarding the potential to occur determinations based on available information and any habitat assessments that may be provided by LSPGC, which will be used to inform the need for any associated mitigation.	LSPGC had planned to prepare a formal habitat assessment for burrowing owl. However, a formal habitat assessment requires access to private property that will not be impacted by the Proposed Project, and there is a high probability that access to that property will not be granted. As such, LSPGC will coordinate directly with CDFW regarding the need to prepare a formal habitat assessment for burrowing owl. LSPGC will provide CDFW with the assessments that have been competed as part of the Proposed Project, and for other projects in that area, and will solicit feedback on the need to complete the formal assessment and the need to conduct additional surveys. LSPGC will provide the CPUC with the meeting notes and final agency recommendations. Please also note that the East Contra Costa County HCP does not provide coverage for projects in Solano County and LSPGC does not anticipate utilizing the HCP for take coverage for project components located in Contra Costa County.