

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 8, 2023

Anthony Barranda
Senior Advisor - Infrastructure Licensing
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, California 91770

Re: Data Request #3 for the SCE TLRR Gorman-Kern River 66 kV Project (A.22-02-014)

Dear Mr. Barranda:

Southern California Edison Company (SCE) submitted its Permit to Construct (PTC) application and Proponent's Environmental Assessment (PEA) on February 28, 2022. The California Public Utilities Commission (CPUC) Energy Division provided PEA deficiency letters to SCE on March 29, April 29 and October 31, 2022 and SCE is currently completing additional analysis.

As we prepare for completion of the environmental analysis for the CEQA compliance document, we have identified additional information needed from SCE. Attached please find Data Request No. 3, which defines the additional questions we have at this time. We would appreciate your prompt responses to our data requests. We request that a response to this request be provided to us within two weeks (by June 22, 2023) to assist us in completing our analysis.

One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, Inc. in electronic format. Any questions on this data request should be directed to me by email at eric.chiang@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Eric Chiang".

Eric Chiang
Project Manager, Energy Division

cc: Blanca Solares, Southern California Edison
Lauren P. Goschke, Southern California Edison
Case Administration, Southern California Edison
Susanne Heim and Jessica Koteen, Panorama Environmental

Submittal

Document Title: Proponent's Environmental Assessment for Southern California Edison Company's TLRR Gorman-Kern River 66 kV Project

Data Request Form No. No. 3

Description: Data Request #3

From: Panorama Environmental Inc.

To: Southern California Edison

Date Submitted: June 8, 2023

Determination

- ☐ Meets CPUC Requirements, No Additional Information Needed
- ☐ Does not Meet CPUC Requirements (see Deficiencies below)
- ☒ Additional Data Needed (see Data Requests below)

Data Request

PEA Section or Page #	Comment Code	Data Request
Section 3: GKR Project Description		
3.5 Construction		
Temporary and Permanent Impact Areas		
Table 3.5-1. Access and Spur Road Land Disturbance	DR3-1	<p>Table 3.5.1 in the PEA lists 38 acres of permanent disturbance from road rehabilitation work (in addition to the 180 previously disturbed for existing roads), but GIS data was not provided for these areas. Please clarify where additional permanent disturbance would occur. If this is an assumed buffer from the roadway, provide the assumption used in the analysis; however, if it is a physical area that was defined in GIS, provide the shape files to support the evaluation.</p> <p>The access road GIS data previously provided by SCE does not match the acreage listed in Table 3.5.1. Most features are 14 feet wide in our GIS dataset (which we have analyzed as approx. 140 acres), but the PEA lists roads to be between 15 to 20 feet wide (for a total of 180 acres). Please clarify the discrepancies between GIS data provided and totals specified in the PEA.</p>
Table 3.5-3. Work Area Disturbance Areas	DR3-2	<p>Table 3.5-3 in the PEA defines acres of temporary disturbance by construction work area type. Please confirm that all temporary disturbance areas as labeled in the GIS data will be restored to pre-construction conditions following construction. If there are anticipated permanent impacts from work pads (e.g., long term maintenance use) or any other of these use areas, please specify.</p>
Table 3.5-4. Permanent Disturbance Associated with Structures	DR3-3	<p>Table 3.5-4 in the PEA provides areas of permanent disturbance required for the project. This data is listed in acreage per pole/type. Please specify if the acreage of permanent disturbance (e.g., vegetation clearance in compliance with the Wildfire Mitigation Plan) reflects a buffer from each structure (i.e., provided as points in the GIS data) and what that buffer of permanent disturbance is from each structure. Is the buffer the same for all structures? If the clearance buffers/permanent impact areas are not consistent across all structures, please provide GIS data or specific dimensions per structure type that were used for these impact areas (e.g., rectangle or square pads). Please specify the standard clearance zone and enhanced clearance zone in terms of</p>

PEA Section or Page #	Comment Code	Data Request
		distance from the structure that apply to the project structures in compliance with the 2023-2025 Wildfire Mitigation Plan specifications.
Section 5: Environmental Analysis		
5.4 Biological Resources		
Impacts to Vegetation Communities and Jurisdictional Waters		
Appendix C of the PEA (Jurisdictional Delineation Report)	DR3-4	The Jurisdictional Delineation report does not include wetland survey coverage along the existing access roads or overland travel routes. There would be some work within the access roads (and potentially a buffer depending on response to DR3-2 above) to allow for large construction equipment to access the work areas (e.g., grading/smoothing), and there would be some impacts in overland travel routes. These activities would have the potential to impact wetlands and other potentially jurisdictional waters resources if occur within the access roads or overland travel routes. Please provide survey results for wetlands/waters along the access and overland travel roads. Or provide documentation supporting that no wetlands or other jurisdictional waters occur along any of the access roads or overland travel routes.
Appendix C of the PEA (Sensitive Species and Habitat Report)	DR3-5	The Sensitive Species and Habitat report does not include assessments of vegetation communities (including sensitive communities) along access roads or proposed overland travel routes. There would be some work within the access roads (and potentially a buffer depending on response to DR3-2 above) to allow for large construction equipment to access the work areas (e.g., grading/smoothing), and there would be some impacts in overland travel routes to sensitive vegetation communities if they were to be occur in the area. Please provide vegetation community mapping and GIS data for all areas of disturbance along the access roads and overland travel routes.