Southern California Edison
A.22-02-014 – GKR PTC

DATA REQUEST SET E D - S C E - 0 0 3

To: Energy Division
Prepared by: Alexander Podruski
Job Title: Construction Advisor
Received Date: 6/8/2023

Response Date: 6/22/2023

Question 1:
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.
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.

Response to Question 1:

There is no GIS data that presents discrete areas where a given length of access road may be widened. The calculation uses an assumed buffer: The approximately 38 acres of new permanent disturbance is arrived at through the following calculation: approximately 79 miles of access road at a 14.00 foot width; assume upgrading to 18.00 foot width; (79 miles x 5,280 feet/mile x 4 feet) = 1,668,480 square feet; 1,668,480 square feet divided by 43,560 square feet/acre equals approximately 38 acres. Per Transmission Right of Way standards, adding 2’ berm widths on each side of a 14’ road, it yields 18’ roads, that would be potentially impacted during construction of the project.

If previous disturbance is calculated using the road widths and lengths contained in the GIS data, approximately 148 acres of previous disturbance is extant.

As presented in Section 3.8.4.4, SCE performs routine maintenance along its access roads. Kern County also performs routine maintenance of its roads, some of which are identified as access roads. It is anticipated that such routine maintenance, performed prior to and not as part of construction of the GKR Project, will result in an access road network suitable to support construction of the GKR Project without performing the work described in Section 3.5.1.1.

Therefore, the estimation of potential new disturbance is made to provide a conservative estimate.

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Question 2:
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.

Response to Question 2:

As described in Section 3.7.3.2.6, temporary disturbance areas would either be stabilized per the SWPPP or, where construction of the GKR Project disturbs sensitive habitats, restoration and/or revegetation would be performed in those areas. The HRP would contain success criteria that would define the final condition of temporarily-disturbed sensitive habitats. Permanent impact areas are defined in the PEA; no new permanent work pads, etc. would be established at pole locations under the GKR Project.

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Question 3:
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 distance from the structure that apply to the project structures in compliance with the 2023-2025 Wildfire Mitigation Plan specifications.

Response to Question 3:

The permanent disturbance represents a buffer from each structure.

The buffer is not the same for all structures, as stated in Footnote 10: "Existing LSTs and TSPs are assumed to each account for 0.1 acres of permanent disturbance, resulting in 40.1 acres. Existing H-frame structures and two-pole structures are assumed to each account for 0.06 acres of permanent disturbance, resulting in 4.38 acres. Existing three-poles structures are assumed to each account for 0.07 acres of permanent disturbance, resulting in 0.21 acres. Existing poles are assumed to each account for 0.05 acres of permanent disturbance, resulting in 0.25 acres."

The buffer dimensions are presented in Section 3.8.5.1: "SCE maintains vegetation-free access roads, helipads, and clearances around electrical lines. Further, clearance of brush and weeds around structures as may be required by applicable regulations on ROWs is necessary for fire protection. A 10-foot radial clearance around non-exempt poles (as defined by CCR Title 14, Article 4) and a 25 to 50-foot radial clearance around non-exempt towers (as defined by CCR Title 14, Article 4) are maintained in accordance with PRC Section 4292."

The GKR Project structures are not specifically addressed in the referenced Plan.

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DATA REQUEST SET E D - S C E - 0 0 3

To: Energy Division
Prepared by: Mindy Davis
Job Title: Environmental Science Advisor
Received Date: 6/8/2023

Response Date: 6/22/2023

Question 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.

Response to Question 4:

The Jurisdictional Delineation report does include wetland survey coverage along those portions of the existing access roads or overland travel routes that are located within the described survey corridor.

It is known that there are wetlands or other jurisdictional waters that occur along those portions of the access road network and overland travel routes that are located outside the described survey corridor.

SCE will conduct a supplemental waters and wetlands survey along those portions of the access road network and overland travel routes that are outside of the GKR Project's survey corridor and that are also outside of the SCE-provided non-GKR Project specific survey corridor

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DATA REQUEST SET E D - S C E - 0 0 3

To: Energy Division
Prepared by: Mindy Davis
Job Title: Adviser, Envir Science
Received Date: 6/8/2023

Response Date: 4/3/2024

Question 4 Supplemental:
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.

Response to Question 4 Supplemental:
Please find the survey results for wetlands/waters along the access and overland travel roads as conducted in JAN/FEB 2024.

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To: Energy Division
Prepared by: Mindy Davis
Job Title: Environmental Science Advisor
Received Date: 6/8/2023

Response Date: 6/22/2023

Question 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.

Response to Question 5:

As presented in the response to DR3-1, there is no GIS data that presents discrete areas where a given length of access road may be widened, and thus where project-specific impacts to vegetation communities adjacent to a given length of access road may be impacted.

Vegetation community mapping and associated GIS data will be provided to the CPUC in Q4 2023. SCE will provide vegetation community mapping for a buffered area extending 25 feet from each edge of an access road or overland travel route located outside the previous survey corridor.

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To: Energy Division
Prepared by: Mindy Davis
Job Title: Adviser, Envir Science
Received Date: 6/8/2023

Response Date: 4/26/2024

Question 5 Supplemental:
The Southern portion of the Proposed Project near Gorman Substation is within a Los Angeles County Significant Ecological Area (SEA). The SEA ordinance defines protected trees to include: • Native riparian species and trees listed as rare by California Native Plant Society are protected at 3-inch diameter at breast height (dbh). • Native coniferous species are protected at 5-inch dbh. • Native upland hardwood species are protected at 6-inch dbh. The tree survey report only provided information on removal of trees that are 8 inches dbh or greater and did not provide information on removal of trees that are less than 8 inches dbh, including those that could be protected under the SEA. Will the project require removal of any trees in the SEA that are protected trees under the SEA ordinance? Please provide additional information regarding trees removed from the SEA to support an assessment of impacts from potential conflicts with the SEA ordinance

Response to Question 5 Supplemental:
As requested, additional vegetation surveys were performed, and the vegetation was mapped in GIS. These GIS files have been provided as part of this response.