SCE GKR Project Application Deficiencies

PEA Deficiencies Section or Page #	Comment Code	Deficiency	Quick (Due April 27)	Mid-Term (Due 30 days after April 27)	Long-Term (Due 60 days after April 27)	Response/Modified Text
Chapter 3: Project Description						
3.3 Project Components						
3.4.3.4 New Rights-of-Way or Easements: Development Restrictions 3.5 Construction Pages 3-3 and 3-18	DD3.1	**Issue:** According to the GIS data layers "Subtransmission Structures" and "Subtransmission Alignment", nearly the entire length of Segment 1 would be permanently realigned approximately 15 feet east of the current alignment, except for the northernmost 0.6 mile from structure W4683791E_ E4683792E to Kern River 1 Substation. New structures would be installed alongside the existing alignment but offset in a new alignment immediately east or southeast (see screenshot below). No explanation of this alignment shift or its purpose was identified in the project description. More information is needed about the proposed subtransmission realignments or shifts, and impacts on trees and vegetation associated with maintaining clearances in the new alignment.  **How to Address:** 1 Please provide a detailed description of the purpose and need of the subtransmission line realignment in Segment 1 and explain why the structure replacement is not proposed within the same alignment as it is on the other project segments. 2 Please verify the alignment shift distances (i.e., 15 feet east- southeast) in Segment 1 and verify that such shifts only occur within Segment 1. 3 Please verify that the subtransmission line realignments would not result in any clearance conflicts with existing structures in the proposed corridor, or alternatively identify each potential conflict and described how it would be addressed. It is noted that Section 3.4.3.4 states "No commercial or residential properties or structures would be relocated or demolished as part of the GKR Project." 4 Please identify any areas along the proposed new subtransmission line clearance corridors, where realigned, that would require the clearance of existing vegetation or tree trimming where it is not currently cleared for the existing subtransmission corridor. If no existing vegetation is expected to be cleared or trimmed within the adjusted corridor limits, please state this.		X		1. The Segment 1 alignment is currently a double circuit configuration that would be converted to a single circuit. The two circuits consist of the 66 kV Gorman-Kern River 1 and Banducci-Kern River 1 Lines. The 66 kV Gorman-Kern River 1 Line would need to stay in service while there would be an outage on the Banducci-Kern River 1Line. 2. Only Segment 1 will be shifted. The single circuit would be rebuilt 15 feet east of the existing alignment while the 66 kV Gorman-Kern River Line 1 is still in service. 3. The alignment shift in Segment 1 would not result in any clearance conflicts with existing structures. The alignment shift has been modeled in PLS-CADD utilizing LiDAR data. 4. No trees along the shifted alignment would be trimmed that would not otherwise be trimmed along the existing alignment. Vegetation will be trimmed around each new subtransmission structure in Segment 1; due to the 15 foot lateral shift of the alignment and the longitudinal offset of new structure locations from existing structure locations, vegetation around each new subtransmission structure in Segment 1 would be trimmed that would not otherwise be trimmed around existing structures in the existing alignment .
3.3.4.2 Description of Facilities by Segment	**DD3.2**	**Issue:** Section 3.3.4.2 states for each marker balls for each segment will be installed on overhead wire if and where determined to be appropriate. Section 3.3.5.1.2 states "The FAA has not made a determination regarding the lighting or marking of any component of the GKR	X			SCE will not be filing FAA notifications until final engineering is completed; attached please find SCE's FAA Filing Determination that

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Page 3-9 3.3.5.1.2 Aviation Lighting and/or Marking Page 3-14		Project." **How to Address:** No draft FAA notice and criteria tool results were included with the PEA materials. Please complete the preliminary structure screening for the maximum potential structure heights and span heights for the project and provide the preliminary results for the purposes of the CEQA analysis. Identify segments where marker balls may be required by FAA based on FAA criteria.				contains results from a structure screening process performed for the GKR Project.
3.3.4.4 Different Facilities Page 3-12	**DD3.3**	**Issue:** Section 3.3.4.4 includes the following description about guys: "Guys are typically used when LWS poles or LWS H-frames are located on angles, corners, and dead-ends to provide support to the poles. Guys may also be used on tangent/suspension poles as field conditions dictate. Guying consists of a guy wire (down guy) that is fastened to a pole and attached to a buried anchor, or when there is not adequate space for the required down guy, a shorter guy pole (stub pole) is typically placed with a down guy and buried anchor in a location that has sufficient room for these facilities. The need for and location of guy wires and anchors for LWS poles and LWS pole H-frames would be determined during final engineering and construction on a case-by- case basis. Guying across a roadway would be avoided where feasible." **How to Address:** More information is needed about the potential for guying across roadways. Please evaluate the project alignment and identify any potential locations where guying across roadways could be required based on the angle changes and adjacent road locations, etc. Alternatively, please clarify if guying across roadways is not anticipated, and in the event that such guying would be required to ensure the stability of the line, then provide a statement about how the guying would be established to ensure existing roadway access would not be impeded.			X	SCE anticipates installing guys in the same locations as guys currently exists. SCE does not anticipate installing any new guying across roadways in any new locations. Please see the attached table for a list of the existing guys across a roadway. Guys are installed in accordance with GO95 and SCE's Transmission Overheads Construction Standards (TOH).
Chapter 5: Environmental Analysis						
5.3 Air Quality and 5.6 Greenhouse Gases						
Appendix B - Air Quality Emissions Modeling	**DD5.1**	**Issue:** Emissions from ground construction activities were estimated using CalEEMod v2016.3.2. However, in June of 2021 CalEEMod 2020.4.0 was released. **How to Address**: Update Appendix B of the PEA to account for the updated CALEEMod version and the issues noted in the deficiencies below.			X	Ground construction emissions have been updated using CalEEMod2020.4.0 Revised Appendix B tables submitted under separate electronic cover. **SENT**
Appendix B - Annual Emissions	**DD5.2**	**Issue:** 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 inconsistent between CalEEMod (Appendix B Annual Emissions) and Table 3.6-1 of the PEA for each of the construction activity tasks except for the following instances: i. For Task 2: Staging Areas, Table 3.6-1 contains 10 hours of daily use for the generator while CALEEMOD contains 6 hours. i. For Task 4: Install TSP Foundations, Table 3.6-1 contains 1 piece of equipment for the backhoe/front loader while CALEEMOD has 2 pieces. i. For Task 7: TSP Erection: Table 3.6-1 should denote gasoline for the ¾-ton truck.			X	The following changes have been made: • Equipment hours for generators in Task 2 and backhoe/front loader for Task 8 in the CalEEMod model have been updated to 10 hours of daily use to be consistent with Table 3.6-1. • Table 3.6-1 corrected to denote gasoline for the fuel type for the ¾-ton truck • Appendix L updated for helicopter support truck hours Task 13 (6 hours) and Task 20 (7 hours). For the tasks that the CalEEMod model has doubled equipment use

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		v. For Task 8: Install TSP H-frame Foundation, Table 3.6-1 contains 10 hours of daily use for the backhoe/front loader while CALEEMOD contains 8 hours. v. For Task 11: TSP H-frame Erection, Table 3.6-1 contains 6 hours of daily use for the helicopter support truck while Appendix L: Vehicle Miles Traveled Calculations contains 4 hours. The corresponding calculated VMT is then used in CALEEMOD. i. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 1 piece of equipment for the compressor trailer while CALEEMOD has 2 pieces. i. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 2 pieces of equipment for the backhoe/front loader while CALEEMOD has 4 pieces. i. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 1 piece of equipment for the excavator while CALEEMOD has 2 pieces. t. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 1 piece of equipment for the R/T crane (M) while CALEEMOD has 2 pieces. t. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 1 piece of equipment for the R/T crane (L) while CALEEMOD has 2 pieces. i. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 6 hours of daily use for the helicopter support truck while Appendix L: Vehicle Miles Traveled Calculations contains 4 hours. The corresponding calculated VMT is then used in CALEEMOD. i. For Task 16: Install L-WS Pole, Table 3.6-1 contains 6 hours of daily use for the helicopter support truck while Appendix L: Vehicle Miles Traveled Calculations contains 4 hours. The corresponding calculated VMT is then used in CALEEMOD. i. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the sock line puller while CALEEMOD has 2 pieces. v. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the bull wheel puller while CALEEMOD has 2 pieces. v. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the hydraulic rewind puller while CALEEMOD has 2 pieces. i. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the backhoe/front loader while CALEEMOD has 2 pieces. i. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the conductor splicing rig while CALEEMOD has 2 pieces. i. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the fiber splicing lab while CALEEMOD has 2 pieces. t. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 7 hours of daily use for the helicopter support truck while Appendix L: Vehicle Miles Traveled Calculations contains 4 hours. The corresponding calculated VMT is then used in CALEEMOD. **How to Address**: Update Appendix B to account for the noted issues above.				from the Table 3.6-1 listing, the scheduled days were compressed (by a factor of 2) indicating that two separate crews would be working simultaneously. Thus the number of equipment, workers, and vehicles were doubled for these periods. Revised Appendix B tables submitted under separate electronic cover. **SENT**
Appendix B - Annual Emissions	**DD5.3**	**Issue:** The estimated construction workforce, number of worker trips, number of vendor trips, and number of hauling trips (within Appendix L: Vehicle Miles Traveled Calculations) compares correctly with the information within CalEEMod (Appendix B Annual Emissions) and Table 3.6-1 of the PEA except for the following instances:			X	The employee vehicle travel distance in the CalEEMod model was adjusted to 25 miles per trip.

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		k. Appendix L: Vehicle Miles Traveled Calculations uses an employee vehicle travel distance of 25 miles and CALEEMOD uses 30 miles. i. Table 3.6-1 contains estimated schedule in days for each construction task. Appendix L: Vehicle Miles Traveled Calculations specifics total schedule (days) and total duration (days), for most construction tasks these values are the same. However, for Tasks 3: Existing Lattice Structures/TSP Removal, Task 4: Install TSP Foundations, Task 13B: Existing Lattice Structures/TSP Removal, and Task 20: Install/Remove Conductor/OPGW/OHGW, these values are different with the total duration being half of the total schedule. CALEEMOD appears to use the total duration to estimate air emissions from trucks and employee vehicles. However, it is unclear why the construction duration for Tasks 3, 4, 13, and 20 are about half the total schedule. For example, for Task 3A, the total schedule is 179 days but the total duration is 90 days. The calculations are based on the duration and not the total schedule. i. Appendix L: Vehicle Miles Traveled Calculations does not appear to include vender trips while CALEEMOD does include vender trips. i. Appendix L: Vehicle Miles Traveled Calculations uses a variety of truck trip distances within each construction task. For example, Task 2: Staging Areas has 1-Ton Truck, 4x4 (50 miles per trip and 4 trucks), Boom/Crane Truck (10 miles per trip and 4 truck), Water Truck (10 miles per trip and 8 trucks), and Truck, Semi-Tractor (30 miles per day and 4 pieces. Task 2 occurs for 599 days. The result is a weighted average of 22 miles per truck trip and 11,980 trips or 263,560 miles. However, CALEEMOD has 9,584 trips and 15 miles per truck trip or 143,760 miles. During review this situation was found in many of the construction tasks. . Therefore, the CALEEMOD analysis may be incorrectly estimating truck emissions and be inconsistent with Appendix L. The errors may be in the value of truck trips and/or miles per trip within CALEEMOD. Notably, the data within appendix L is consistent with the information within Appendix B Equipment list. **How to Address**: Update Appendix B to account for the noted issues above.				See DD5.2 for an explanation of the schedule in the CalEEMod model compared to Table 3.6-1. The vehicles evaluated are the same in both the CalEEMod and Appendix L calculations. In CalEEMod, vendor truck trips were used as a surrogate for medium duty trucks. The various truck trips and miles per trips vary by types of vehicle and were averaged by task. A more detailed comparison can be made between Appendix L and the CalEEMod input files (submitted under separate cover). Some minor edits were made based on the comparison of Appendix L and Table 3.6-1 as noted above; there are some rounding differences but the VMT presented in Appendix L matches closely the calculated VMT in CalEEMod (within 0.04%). Revised Appendix B tables submitted under separate electronic cover. **SENT**
Appendix B - Annual Emissions	**DD5.4**	**Issue:** The PEA does not include the electronic copy of the CalEEMod input files (in Excel format). **How to Address**: Include the electronic copy of the CalEEMod input files (in Excel format) and any information with Appendix B and L revised as a result of this review.			X	Revised Appendix B tables submitted under separate electronic cover. **SENT**
Appendix B - Helicopter Emissions	**DD5.5**	**Issue:** Landing and take-off cycle (LTO) emissions incorrectly equal the LTO emission factors for all three helicopter types and do not accurately account for daily hours of LTO or number of LTO. That is, the LTO emissions only accounts for one LTO per day for each helicopter. However, the Project Description does not provide a clear indication of the number of LTOs per day per helicopter. For Skycrane (heavy duty) helicopter, Appendix L: Vehicle Miles Traveled Calculations includes 6 daily hours of use for the Task 7A: TSP Erection and 6 daily hours of use for the Task 11: TSP H-frame Erection while Appendix B (and Table 3.6-1) uses 1 total hour. It appears the daily hours should be 12 (6 hours per task). The daily number of LTOs would be at least two (one for each task). For Kmax (medium duty) helicopter, Appendix L: Vehicle Miles Traveled Calculations (and			X	The duration of the heavy duty and medium duty helicopters that were used in the emission calculation are reflected in revised Table 3.6-1. In addition, tables “Helicopter Emissions Calc Kern 042922” and “Helicopter Emissions Calc Kern SCAQMD 042922” showing the LTO emissions have been modified to more clearly highlight that the LTO emission factors are per event (one land, one takeoff) and not per hour. For the light duty helicopter, the emissions have been adjusted to account for hourly LTO. Revised Appendix B tables submitted under separate electronic cover.

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		Table 3.6-1) includes 6 daily hours of use for the Task 13 Existing Lattice Structure/TSP Removal and 6 daily hours of use for the Task 16 Install LWS Pole while Appendix B uses 4 total hour. It appears the daily hours should be 12 (6 hours per task). The daily number of LTOs should be at least two (one for each task). For Hughes (light duty) helicopter, Appendix L: Vehicle Miles Traveled Calculations (and Table 3.6-1) includes 7 hours of use for the Task 20 Install/Remove Conductor and Install OHGW while Appendix B uses 5 total hour. Appendix L: Vehicle Miles Traveled Calculations also shows two helicopters per day. It appears the daily hours should be 14 (7 hours per task times two helicopters). The daily number of LTOs would be at least two (one for each task and helicopter). Therefore, there is some inconsistency between helicopter use within Table 3.6-1, Appendix B, and Appendix L and it appears the helicopter emissions are underestimated. **How to Address**: Update Appendix B to account for the noted issues above.				**SENT**
Appendix B - Helicopter Emissions	**DD5.6**	**Issue:** Table 3.6-1 of the PEA indicates one light-duty helicopter would be used for 109 days for 7 hours per day. The light-duty helicopter emissions (Hughes) only assumed 55 working days, but then multiply the emissions by two noting there would be two helicopters. However, the emissions are only multiplied by two in the summary tab for daily emissions (lbs/day). Annual emissions in the summary tab and daily and annual emissions in the Hughes tab underestimate the emissions by 50%. **How to Address**: Update Appendix B to account for the noted issues above.			X	This has been corrected within the revised Appendix B tables that is submitted under separate electronic cover. **SENT**
Appendix B Helicopter Emissions Calculations SCAQMD	**DD5.7**	**Issue:** Landing and take-off cycle (LTO) emissions equal the LTO emission factors for all three helicopter types and do not accurately account for daily hours and number of LTO. That is, accounts for only one LTO per day. See 20220228 TLRR GKR PEA 7-of-15 (Appendix B Helicopter Emissions) above. **How to Address**: Update Appendix B to account for the noted issues.			X	Please see response to comment DD5.5.
5.5 Cultural Resources						
Archaeological Report						
Throughout Report	**DD5.8**	**Issue:** Access roads and other project support areas such as pull sites located beyond the 300-foot project corridor were not inventoried and were therefore not evaluated for CRHR eligibility. **How to Address:** Access roads and other project support areas that are outside of the transmission corridor are part of the project impact area and need to be inventoried to allow the CPUC the ability to 1) define CRHR listed or eligible resources in the project area and 2) evaluate project impacts on those resources. All archaeological sites within the project area also need to then be evaluated for CRHR eligibility. Resource evaluation is necessary in order for the CPUC to comply with CEQA. The maps in the Appendices also need to indicate all access roads and support areas outside the corridor as being within the project area (APE/API).			X	SCE is in the process of rationalizing the construction work areas and access routes to be used under the GKR Project. Following this process, any un-surveyed areas that will be used under the GKR Project will be surveyed and the report will be revised and provided to the CPUC. **UNSENT**
Archaeological Report – Section 2.3.2 Page 33	**DD5.9**	**Issue:** There is a potential for Tribal Cultural Resources within the APE/API, but this is not addressed in the report. **How to Address:** Due to the potential for Tribal Cultural Resources within the APE/API, please include a theme for sacred sites or ritualistic sites. Archaeological sites can also have other eligibility beyond NRHP/CRHR criterion D/4 and many of these sites could also be Tribal Cultural Resources. In order to support the CPUC's impact evaluation, be sure to consider			X	The report is being revised to include themes for sacred/ritualistic sites (as well as other types of tribal cultural resources). **UNSENT**

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		archaeological sites within the direct APE/API for consideration under NRHP/CRHR criteria A/1 and C/3.				
Archaeological Report – Section 2.3.3 Page 37	**DD5.10**	**Issue**: Is Kern River No. 1/ Kern River 1 Hydroelectric Substation listed on CRHR or NRHP? **How to Address:** Discuss whether the Kern River No. 1/ Kern River 1 Hydroelectric Substation is listed on the CRHR and/or NRHP. This applies to all archaeological sites within the direct APE/API. If the Project has the potential to impact archaeological sites within the indirect APE/API, include the NRHP/CRHR eligibility. NRHP/CRHR eligibility is necessary to make CEQA impact determinations.			X	The Kern River No. 1 / Kern River 1 Hydroelectric Substation has been determined eligible. SCE is in the process of rationalizing the construction work areas and access routes to be used under the GKR Project. If, following that rationalization process, there is the potential to impact resources, those resources will be further evaluated and an eligibility recommendation made. **UNSENT**
Archaeological Report – Section 3.2.1 Page 40	**DD5.11**	**Issue:** The report did not include a discussion regarding the treatment of isolates. **How to Address:** The treatment of isolates needs to be included here. The isolates should be recorded on DPR forms with primary and location maps and be submitted to the Information Center to have a Primary number assigned. Isolates are generally considered to have very little data potential, but they are not *de facto* ineligible for the NRHP/CRHR. They need to be documented and discussed in the report.			X	Isolates were identified in a tabular format in the report. DPR forms are being prepared for each isolate, and the report is being revised accordingly. **UNSENT**
Archaeological Report – Section 4.3 Page 47	**DD5.12**	**Issue:** Management summary states that 7 previously recorded resources could not be recorded, section 4.3 states 6 previously recorded resources could not be relocated. **How to Address:** Inconsistencies such as this need to be corrected throughout the report in order for the CPUC to make valid CEQA findings.			X	One resource has two numbers associated with it. This is being clarified in the revised report. **UNSENT**
Archaeological Report - Section 4.3 Page 55	**DD5.13**	**Issue:** According to Appendix E, sites P-15-020126, TLRR-KR-005, P-15- 020129, P-15-020127, P-15-001540, P-15-001643, P-15-020125, P-15-008780, TLRR-KR-008, lie within a work area. These resources were not evaluated for eligibility and it is unclear how these sites could be avoided. **How to Address:** The report needs to clearly indicate how sites that are within work areas will be avoided or they will need to be evaluated for eligibility on the CRHR/NRHP. All archaeological resources within the direct APE/API, including archaeological isolates need to be evaluated for eligibility on the CRHR. This may require archaeological testing/excavation (Phase II). If a site is considered a unique archaeological resource or eligible for the CRHR, attempts to avoid or mitigate the site will be necessary and need to be documented.			X	Please see response to comment DD5.10. **UNSENT**
Archaeological Report - Appendix E, Page 89	**DD5.14**	**Issue:** Boundaries of site P-15-007761 are unclear. This resource is not included in the body of the report. All resources in the maps should be in the report and vice versa. **How to Address:** Please be sure that a thorough QA/QC check is made within the report and all Appendices so that all resources within the project area are properly documented.			X	This is being fixed in the revised report. **UNSENT**
Archaeological Report - Appendix E, Page 402	**DD5.15**	**Issue:** Segment 5 appears to continue off this page, **How to Address:** There needs to be a map showing the termination of segment 5.			X	This is being fixed in the revised report. **UNSENT**
5.7 Geology, Soils, and Paleontological Resources						
Section 5.7.4.2 Page 5-200	**DD5.16**	**Issue:** The PEA Appendices do not include the geotechnical report. The geotechnical report is discussed in the PEA and should be provided. **How to Address**: Provide the geotechnical report.	X			Geotechnical report was provided under separate electronic cover. **SENT**

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Paleontological Report						
Paleontological Report - Executive Summary Section 4.2 and 6.0 Pages 21 and 37	**DD5.17**	**Issue:** Report does not specify the areas that were covered by the paleontological survey. **How to Address:** Clarify areas that were covered by the paleontological field survey covered (i.e.: 300-foot buffer around the transmission line?). Provide a map and GIS data with the field survey area.			X	The paleontological survey buffer around the transmission line is being added to the body of the paleontological report along with a survey map; GIS data will be provided at the time the revised report is submitted. **SENT**
Paleontological Report Section 5.2 Page 32	**DD5.18**	**Issue:** The report does not define records search limits. **How to Address:** Define the paleontological record search limits.			X	The PEA indicates that the records search buffer was ½ mile. This information is being incorporated into the body of the revised paleontological report. **SENT**
5.4 Biology and 5.11 Land Use and Planning						
Section 5.11.1.2.1.5 Page 5-238	**DD5.19**	**Issue:** The PEA states: "Portions of Segment 2, 3, and 4 are located on lands identified as 'Conservation Areas' in the Tejon Ranch Conservation and Land Use Agreement". Additionally on page 5-7 it states, "The GKR Project alignment continues southeast, crossing largely undeveloped open grassland and seasonal wetland within Castaic Valley, a part of the Tejon Ranch Conservancy, before traversing an area of unpaved trails and near the summit of the east-west trending spine of the western Tehachapi Mountains and entering Los Angeles County". However, the document does not address how the Project would impact lands and habitats within the Tejon Ranch Conservancy and 'Conservation Areas' in the Tejon Ranch Conservation and Land Use Agreement. **How to Address**: Update the PEA to include analysis on how the Project would impact lands and habitats within the Tejon Ranch Conservancy and 'Conservation Areas' in the Tejon Ranch Conservation and Land Use Agreement. Provide GIS data or a map showing the conservation areas within the Project alignment and work areas.		X		Section 5.4 addresses impacts to habitat along the entirety of the GKR Project alignment, including those lands identified as 'Conservation Areas' in the Tejon Ranch Conservation and Land Use Agreement. GIS data is being updated and will be provided under separate electronic cover. **SENT**
5.13 Noise						
Section 5.13.4.2.1 Table 5.13-3, Page 5-257	**DD5.20**	**Issue:** The footnote for Table 5.13-3 states that "there are no established noise level standards applicable to Project-related construction activities in unincorporate Kern County, the City of Arvin, or the City of Bakersfield; therefore, work in these jurisdictions would not generate noise in excess of established standards and work in these areas is not addressed in this Table." Although these jurisdictions do not have specific decibel thresholds for construction noise, they do restrict hours of construction. **How to Address**: Include estimated noise levels for construction occurring outside of Los Angeles County (City of Arvin, City of Bakersfield, and Kern County) to Table 5.13-3.	X			Construction activities occurring outside of Los Angeles County would generate the same estimated noise levels as would construction activities shown in Table 5.13-3, Construction Noise Levels.
5.18 Tribal Cultural Resources						
Section 5.18.1.2.2.2 Page 5-294 and Page 5-295	**DD5.21**	**Issue:** The PEA is unclear on the number of villages in the APE and where they are located. **How to Address:** Clarify how many "a few" villages are and where (if location is known). If location is not known since consultation with the tribes has not yet occurred, then only use the known village sites.			X	This is being clarified in the revised report. There are no known locations of village sites within the project area. **UNSENT**
Section 5.18.1.2.2.3 Page 5-294	**DD5.22**	**Issue:** The location of the Kitanemuk village is not defined **How to Address:** Elaborate where the one Kitanemuk village is on the transmission line.			X	This is being clarified in the revised report. The specific location of Kitanemuk village is not mapped along the transmission line; rather it

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		Provide a citation to the publication that gives the village location.				is identified to be located in the general area/region. **UNSENT**
Section 5.18.1.2 Page 5-293	**DD5.23**	**Issue:** The PEA does not include any maps showing the locations of ethnographic resources. **How to Address:** Provide a map and GIS data if available with the locations of ethnographic resources. Provide descriptions of each resource.			x	This is being clarified in the revised report. There are no known locations of ethnographic resources along the transmission line, rather they are identified to be in the general area/region. **UNSENT**

SCE GKR Project Application Needs

PEA Needs Section or Page #	Comment Code	Deficiency	Quick	Mid-Term	Long-Term	Response/Modified Text
Chapter 3: Project Description						
3.3 Project Components						
Section 3.3.3.1.1 Page 3-6 and Appendix J, Figures 4a and 4b	**DN3.1**	**Issue:** Table 3.3-1 indicates the difference in height between existing and proposed structures. In Segment 2 the existing LST/TSP poles are indicated to be 47 feet high and will be replaced with poles approximately 100 feet high, roughly double the height. If that were correct it would appear that the simulations for KOP #6 may present a height that is not accurate. However, structure-specific height as shown in the GIS files show the new poles seen in Figures 4b to be 70 feet high, more in line with the simulation. **How to Address**: Revise Table 3.3-1 to show the range of new structure heights in each segment.	X			No revisions to Table 3.3-1 are necessary. Table 3.3-1 indicates that the height of **existing** structures in Segment 2 range from 47 feet in height to 100 feet in height. Table 3.3-1. Approximate Number of Existing Structures to be Removed or Modified Pole Type / Number of Structures Removed / Number of Structures Modified / Approximate Height Above Ground, Existing and Modified Structures (Feet) Segment 1 LST / 117 / 6 / 29 – 95 H-frame / 38 / 0 / 51 – 71 Two-pole structure / 1 / 0 / 66 Segment 2 LST/TSP / 189 / 0 / 47 – 100 H-frame / 3 / 0 / 50 – 62 Poles / 2 / 0 / 81 – 92 As shown in Table 3.3-2, the **replacement** structures in Segment 2 will range in height from 52 to 105 feet. Table 3.3-2. Structures to be Installed Pole Type / Proposed Approximate Number of Structures / Approximate Height Above Ground (Feet) Segment 1 TSP / 38 / 50 – 100 TSP, H-frame / 2 / 55 – 70 LWS Pole / 114 / 52 – 97 Segment 2 TSP / 46 / 60 – 105 LWS H-frame / 2 / 52 – 57 LWS Pole / 147 / 52 – 84 The simulations are correct, in that the "structure-specific height as shown in the GIS files show the new poles seen in Figures 4b to be 70 feet high" is consistent with the data shown in Table 3.3-2.
3.3.14.3 Below- Ground Telecommunication Line Page 3-16	**DN3.2**	**Issue:** 3.3.14.3 states "Fiber optic cable would be installed below- ground within and immediately adjacent to the existing Banducci, Gorman, and Kern River 1 Hydroelectric substations. Fiber optic cable would be routed belowground from the control building or MEER at these substations to a getaway structure, and then would transition to an above-ground configuration." Figureset 3.5-3:		X		GIS data is being updated and will be provided under separate electronic cover. **SENT**

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		Telecommunications Underground Routes roughly identifies the general routes of the underground telecom routes; however, portions are not shown and the maps are not detailed. Further the PDF files for Figureset 3.5-3 appear to be corrupted and are not displaying properly like the other figures in the file. The GIS data layer for "Telecom Alignment" includes only overhead portions of the telecom features or the underground portions are not distinguished. **How to Address:** Please provide GIS data for the underground portions of the telecommunication line. Please provide GIS data for the approximate locations of the vaults and pull boxes on the underground sections of the telecom lines.				
3.3.2.2.3 Substations Page 3-5	**DN3.3**	**Issue:** Section 3.3.2.2.3 includes the following description with the work described for substations; however, this paragraph and the prior paragraph appear to describe O&M for the entire project. "There are two phases associated with the GKR Project: the construction phase and the operations and maintenance (O&M) phase. This PEA addresses the construction phase and its potential impacts. Construction of the GKR Project will not be phased; construction of any one component or all components could be performed at any one time. At present, SCE is performing O&M activities along the existing subtransmission lines included in the GKR Project, and any past and potential future impacts associated with these O&M activities are considered part of the existing environment. Therefore, the potential impacts that may result during the O&M phase are not addressed unless such potential future impacts differ from the potential future impacts that may result from performing O&M activities along the existing subtransmission lines included in the GKR Project." **How to Address:** Please clarify if a heading is missing and if this statement about O&M is intended to apply to the entire project beyond substation activities.	X			No heading is missing. This statement is applicable to the entire scope of the proposed GKR Project.
Figure 1.1-1a and Figures 1.1-1a through 5.1-7b	**DN3.4**	**Issue:** While Figure 1.1-1a indicates the general photograph viewpoint locations of KOPs, it is unclear where the photographs of existing conditions and simulations are exactly located which makes it difficult to verify. For example, Figures 4a and 4b simply state "Towerline Road near Arvin". **How to Address:** Update the PEA to provide original photography of KOPs with EXIF and GPS information or provide a table listing GPS coordinates of KOP imagery.	X			The GPS coordinates for KOPs utilized in visual simulations are as follows: KOP4: 35.331164, -118.814327 KOP6: 35.200982, -118.806178 KOP9: 34.874659, -118.892719 KOP13: 34.792170, -118.835651 KOP15: 35.096493, -118.663428
Table 3.3-1. Approximate Number of Existing Structures to be Removed or Modified 3.3.3.1.2 Structures to be Modified Page 3-6 3.3.4.2.1.5 Segment 5 Page 3-10 GIS Data Layer: "Subtransmission Structures"	**DN3.5**	**Issue:** Section 3.3.3.1.2, Structures to be Modified, states: "…In Segment 5, insulators would be replaced on existing structures and the distribution circuit underbuild would be modified on one other existing structure." In Table 3.3-1 for Segment 5, it appears 4 structures would be modified. **How to Address:** Please clarify if these four structures are the only structures where insulators would be replaced in Segment 5 or identify any other structures where such activities would occur. **Issue:** The GIS data for "Subtransmission Structures" does not include any structures in the "Modify" class in Segment 5. Besides the numerous existing and new structures, the other feature class is for "New-R-EX". **How to Address:** Please clarify which structures would be modified and their names/locations per the Project Description. **Issue:** In addition, Section 3.3.4.2.1.5 states the existing distribution underbuild in Segment 5 would be modified. **How to Address:** Please specify the portion of Segment 5 length and structures where underbuild would be modified. Please clarify if the distribution modification would involve anything other than		X		To remediate identified discrepancies or to facilitate the remediation of identified discrepancies, the insulator assemblies on up to 3 existing poles (2287523E, 2287525E, and 4410594E) may be modified; the modification of the insulator assemblies on any other existing poles is not anticipated. The distribution circuit underbuild would be modified on a different pole (314174E). Thus, the infrastructure on 4 poles would be modified as stated in Table 3.3-1. GIS data is being updated and will be provided under separate electronic cover. **SENT** The distribution circuit underbuild on pole (314174E) would be modified to remediate identified discrepancies or to facilitate the remediation of identified discrepancies. Existing underbuild elsewhere along the length of Segment 5 may be

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		transfer, per the statement in Section 3.3.2.2.2, Distribution.				modified (i.e., the underbuild may be raised or lowered on the pole) during installation of the ADSS fiber optic cable.
3.3.4.6 Permanent and Temporary Facilities Page 3-13	**DN3.6**	**Issue:** Section 3.3.4.6 states "Approximately two temporary wood poles would be installed and then removed at the junction of Segments 2 and 3 to facilitate construction…" **How to Address:** Please explain the purpose of these temporary wood poles. It is assumed that these temporary poles would be located within the identified construction workspaces. Please confirm.	X			The temporary wood poles would be required so that Frazier Park Substation can be temporarily fed via Kern River 1 Hydroelectric Substation, while Segment 3 is being rebuilt. The temporary wood poles would be located within one or more identified construction work areas.
3.5.5.2.1.1 Segment 1 Page 3-36	**DN3.7**	**Issue:** Clarification is needed regarding the processed based construction description for Segment 1, based on DD3.1 above regarding the proposed realignment of the segment by approximately 15 feet east-southeast. **How to Address:** Would the new structures and conductor be entirely constructed alongside the existing alignment while the existing line remains energized, or would the energized conductor be transferred over to the new structures periodically as they are installed? Please explain the phasing of the realignment in Segment 1.	X			The new structures and conductor would be entirely constructed alongside the existing alignment while one of the two existing circuits remains energized. No energized conductor would be transferred. The description in Section 3.5.5.2.1.1 is accurate as written. Text below provides the requested clarification. _____ 1. Planning – Develop a wire stringing plan to determine the sequence of wire pulls and the locations of pull-and-tension/stringing sites. 2. Establish pull-and-tension/stringing sites – Pull-and-tension/stringing sites would be established and wire pulling equipment would be set-up within the sites. At one end of a wire pull, a puller would be set-up; at the other end of a wire pull, a tensioner with wire reel stand truck would be set-up. 3. Guard structures would be installed at all electrical structures and roads where required. 4. De-energize circuit – The subtransmission circuit on one side of the existing structures would be deenergized. 5. Stringing sheaves (rollers or travelers) would be installed on the side of the existing structures where the de-energized circuit is located. 6. The existing conductor would be transferred to the stringing sheaves. 7. Roads would be closed, and traffic would be stopped where necessary. 8. Safety devices such as traveling grounds and radio-equipped public safety roving vehicles and linemen would be placed along the wire pull. Guard structures would be installed at all electrical structures and roads where required. 9. The existing conductor would be pulled through the stringing sheaves and spooled on wire reels sited in a pull-and-tension/stringing site. A conductor pulling rope/cable attached to the end of the conductor would allow tension on the conductor being removed to be maintained. Following the removal of the conductor, the rope/cable would be removed from the old conductor and would be used to pull in the new conductor (see Step 13 below). 10. Roads would be opened, and traffic flow allowed to resume. 11. Pole/tower installation – All r~~R~~eplacement single-circuit structures would be

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						installed. 12. Stringing sheaves would be installed on the replacement structures and structures to be reused. 13. A sock line (or the rope/cable described above) would be threaded through the stringing sheaves. A bucket truck is typically used to install the lightweight sock line from structure to structure. The sock line would be threaded through the roller to engage a camlock device that would secure the pulling sock in the roller. This threading process would continue between all structures through the rollers of a set of spans selected for a conductor pull. In areas where a bucket truck is unable to install a lightweight sock line, a helicopter would fly the lightweight sock line from structure to structure. Alternatively, a helicopter may be used to install the sock line for the entire length of the pull section. Roads would be closed, and traffic would be stopped where sock line threading occurs over a public roadway. 14. Roads would be closed, and traffic would be stopped where necessary. 15. Conductor/OPGW installation – All ~~r~~Replacement conductor and OPGW would be installed on the replacement and reused structures. The sock line would be used to pull in the conductor pulling rope and/or cable. The pulling rope or cable would be attached to the conductor using a swivel joint to prevent damage to the wire and to allow the wire to rotate freely to prevent complications from twisting as the conductor unwinds off the reel. Once the conductor is pulled in, if necessary, all mid-span splicing would be performed. Once the splicing has been completed, the conductor would be sagged to proper tension and dead-ended to structures. After the conductor is deadended, the conductors would be secured to all tangent structures in a process called clipping-in. 16. Energize /deenergize circuits – The newly-installed circuit on replacement and reused structures would be energized, and the remaining existing circuit on the existing structures would be deenergized. 17. Conductor removal – The remaining deenergized subtransmission conductors on the existing structures would be removed as described above. 18. Existing structure removal – Existing structures would be removed. 19. Restoration – Areas would be restored/revegetated as appropriate.
3.5.10.4 Livestock Page 3-47	**DN3.8**	**Issue:** Section 3.5.10.4 states: ”No livestock fencing or guards will be installed as part of the GKR Project to prevent livestock from entering project areas.” **How to Address:** Please describe SCE’s construction work practices that will be followed, if any, within areas where livestock maybe present, such as general procedures for securely covering and/or fencing excavations, etc.		X		3.5.3.1.2.5 Excavations and Associated Equipment Work Areas No excavations except those associated with the installation of LWS poles, installation of TSP foundations, removal of existing LST or TSP foundations, and installation of underground telecommunication cable are included in the GKR Project. Excavations for the installation of underground telecommunication cable would require an equipment work area extending approximately 10 feet on either side of the telecommunication cable route. Open excavations will be either attended

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						or covered.
GIS Layer: “Subtransmission Structures”	**DN3.9**	**Issue:** The GIS layer for “Subtransmission Structures” includes two structures with the STATUS attribute “New-R-EX.” These proposed new structures are located in Segment 5 (structures 4332484E and 4410595E) on either side of 2287525E) in an area where no other structure replacement is identified. **How to Address:** Please clarify the purpose of these new structure installations. **Issue:** Looking at aerial imagery, two existing structures at these locations are visible; however, the existing structures are not included in the “Existing” structure GIS features (see screenshot below). **How to Address:** Are the proposed activities at these locations similar to existing structure modification? Please clarify. 		X		These new poles, like all new poles under the GKR Project, would be installed to remediate an identified GO 95 discrepancy. The structures are shown in the GIS as New-R-Ex (New Replacing Existing). Because they are identified as New-R-Ex, they cannot also be listed as ‘Existing’. The proposed activities at these locations are described in Section 3.5.5.2.1.5. The new poles would be installed per Section 3.5.5.1.2.2 and the existing poles would be removed per Section 3.5.5.1.1.1. The insulator assemblies on up to 3 existing poles (2287523E, 2287525E, and 4410594E) may be modified; the modification of the insulator assemblies on any other existing poles is not anticipated.
GIS Layer: “Subtransmission Structures”	**DN3.10**	**Issue:** The GIS layer for “Subtransmission Structures” includes a data column attribute called CONST_MTHD for Construction Method. All structures are assigned “Conventional” regardless of status. Based on the Project Description, Section 3.5.5.1.3 Foundation Installation, it appears conventional construction methods may be referring to either of the three foundation options: (1) drilled, poured-in-place, concrete foundation, (2) installed on drilled micro-piles, or (3) direct-buried. **How to Address:** Please clarify if the above assumptions are correct. Please identify the anticipated preliminary foundation methods for each project structure, or alternatively it may be assumed that each structure will involve the most impactful activities and greatest number of trips associated with there construction (i.e., concrete pier foundations). If specific foundation methods cannot be provided, please provide an estimated percentage of the anticipated foundation method use.	X			The assumptions are not correct. The CONST_MTHD attribute is used to identify the type of construction that will be employed. That field has three potential entries: Conventional, Helicopter, and TBD. The CONST_MTHD attribute does not correlate with the type of foundation selected for a given TSP. It can be assumed that a concrete pier foundation will be utilized for every TSP included in the GKR Project.
GIS Data Layer: “Right of Way”	**DN3.11**	**Issue:** The GIS data layer “Right of Way” (ROW) does not distinguish between existing and new ROW areas for the subtransmission lines. **How to Address:** Please explain how to interpret the GIS data that was provided. Figure 3.4-1, New Easements Required, identifies portions of the subtransmission line alignment where new easements are needed. Please provide GIS data that identifies existing vs. the new targeted easements corridors. If these areas are already included in GIS data that was provided, please revised the data to include an attribute that distinguishes between existing and proposed ROW areas. **Issue:** A ROW area is shown around a single access road in Segment 1. **How to Address:** Please explain this ROW corridor and why other access roads or easement roads to access the line are not shown. Please identify any additional access road corridors where ROW easements to the subtransmission line are required for construction and operation.			X	The GIS data provided to-date included only the current ROWs. Proposed ROW GIS layer will be submitted under separate electronic cover. **UNSENT** This area was shown in error and has been removed. SCE's existing rights do not cover the existing line and that's why they don't align on the GIS. New rights will need to be acquired to cover the facilities.

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		Issue: There are areas of the ROW GIS layer that do not appear to align with the linear Subtransmission Alignment features where the project aligns are not within an identified ROW. **How to Address:** Please clarify the locations where these discrepancies were observed below. Please provide a revised layer as applicable. • Segment 2 between existing structures 2175040E and NO 5 • Segment 2 between existing structures M44-T1 and M46-T6 • Segment 3 between existing structures 4410456E 4410457E and M48-T9 • Segment 3 between existing structures M50-T10 and Gorman Sub Segment 5 between existing structures X7655E and Banducci Sub				
Appendix O: 300' and 1,000' Lists GIS Data Layer: "Right of Way"	**DN3.12**	**Issue:** An excel file with the 300' and 1000' lists was provided (Appendix O[1]). The CPUC does not currently poses the parcel GIS data necessary to verify the spatial methodology for compiling this list and also prepare subsequent mailing lists that may be necessary during the CEQA process. The data layer for "Right of Way" does not include APN numbers that could be used to join the tabular information with the spatial information. **How to Address:** Please provide a copy of the APN GIS data that was used to compile the lists included in Appendix O.	X			The Terms and Conditions of the License Agreement under which that data was procured do not permit SCE or its contractor to provide said data to other parties.
Chapter 5: Environmental Analysis						
5.3 Air Quality and Noise						
Section 5.3.1.3, Page 5-34 Figure 5.13-1a-d Sensitive Receptors	**DN5.1**	**Issue:** Section 5.3.1.3 directs the reader to Figure set 5.13.1 in Section 5.13, Noise, for detailed descriptions of the locations of residential areas and other sensitive receptors in the vicinity of the GKR Project. However, Figure set 5.13.1 does not differentiate between the different types of sensitive receptors. Per the *Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments* (2019 CPUC *Guidelines*), the air quality section should "identify the location and types of each sensitive receptor locations within 1,000 feet of the project area." Therefore, Figure set 5.13.1 should be updated to differentiate the different types of sensitive receptors (i.e., residences, schools, day care centers, etc.). **How to Address**: A separate column should be added to Table 5.13-1 that identifies the type of sensitive receptors. Update Figure 5.13-1 to differentiate the different types of sensitive receptors (i.e., residences, schools, day care centers, etc.).			X	Figure 5.13-1 revised to remove all sensitive receptors beyond 1,000 feet of a project-related feature and to identify the type of sensitive receptor. SCE presumes the citation to Table 5.13-1 should reference Table 5.13-3. If this presumption is correct, the type of sensitive receptor is already cited in the column titled 'Receptor Nearest to Construction Phase'.
5.5 Cultural Resources						
Archaeological Report						
Archaeological Report - Appendix G	**DN5.2**	**Issue:** Many of the photos are of poor quality and the detail is blurry. Pictures need to be of higher quality. As part of our review we need to be able to better understand the conditions and items discovered at the sites. Clear pictures are critical to completing this analysis. **How to Address:** Please provide .Jpegs of all photos			X	Photograph files will be provided when the revised report is submitted. **UNSENT**
5.6 Energy						
Section 5.6.4.3.1 Table 3.5-5 vs. Table 5.6-1 Pages 3-49 and 5-	**DN5.3**	**Issue:** Fuel consumption estimates presented in Table 5.6-1 are inconsistent with the fuel consumption estimates presented in Table 3.5-5. The diesel volume in Table 5.6-1 is higher and inconsistent with the diesel volumes anticipated to be stored on site, as reported in Table 3.5-5. For example, Table 5.6-1 reports total diesel consumption as 386,506 gallons, whereas Table 3.5-5 reports a total diesel storage volume of 386,486 gallons during construction. It is also anticipated		X	~~X~~	Note that Table 3.5-5 does not present the volumes of fuels that may be stored; it presents the volumes of fuels that may be consumed. SCE has modified Table 3.5-5 to reference to Table 5.6-1.

<table>
<tr><th>PEA Needs
Section or Page #</th><th>Comment Code</th><th>Deficiency</th><th>Quick</th><th>Mid-Term</th><th>Long-Term</th><th>Response/Modified Text</th></tr>
<tr><td>175</td><td></td><td>that gasoline consumption volumes could be higher than the volumes planned to be stored onsite. For example, passenger vehicles are not expected to refuel at onsite storage locations. Confirmation of consistency between Table 5.6-1 diesel consumption volumes and volumes used in in the air quality calculations could not be performed because technical report was not available.
How to Address: Correct the PEA so the diesel volumes in Table 5.6- 1 are consistent with the diesel volumes in Table 3.5-5 AND Update Appendix B to account for the issue noted above</td><td></td><td></td><td></td><td>Table 3.5-5. Types, Uses and Volumes of Hazardous Materials
<table>
<tr><th>Hazardous Material Type</th><th>Use</th><th>Approximate Volume (gallons)</th></tr>
<tr><td>Diesel</td><td>Engine fuel</td><td>Please see Table 5.6-1</td></tr>
<tr><td>Gasoline</td><td>Engine fuel</td><td>Please see Table 5.6-1</td></tr>
<tr><td>Lubricants/Hydraulic Fluids</td><td>Engine and equipment lubrication/ Powering hydraulic equipment</td><td>21,700~~753~~</td></tr>
<tr><td>Miscellaneous Construction Fluids (solvents, etc.)</td><td>Cleaning/lubricating hardware, etc.</td><td>1,100~~088~~</td></tr>
</table>
Notes:
Diesel and gasoline volumes developed through California Emissions Estimator Model® (CalEEMod)
Lubricants/hydraulic fluids consumption assumed at approximately 5 percent of non-aviation fuel consumption.
Miscellaneous construction fluid volumes assumed at approximately 5 percent of Lubricants/Hydraulic Fluids volume.</td></tr>
<tr><td colspan="7">5.9 Hazards, Hazardous Materials, and Public Safety</td></tr>
<tr><td>Section 5.9.1.3
Table 5.9-2
Page 5-208</td><td>DN5.4</td><td>Issue: The SRA, LRA, and FRA columns in Table 5.9-2 do not indicate the units of measurement so it is unclear what the numbers indicate.
How to Address: Update Table 5.9-2 to include the appropriate units for the SRA, LRA, and FRA columns in Table 5.9-2</td><td>X</td><td></td><td></td><td>Revised Table 5.9-2 is provided below.
Table 5.9-2. Miles of GKR Project Alignment within Designated Fire Hazard S
<table>
<tr><th>Project Segment</th><th>Fire Hazard Severity Zone</th><th>Distance (miles)</th><th>SRA* (miles)</th><th>LRA* (miles)</th><th>FRA* (miles)</th><th></th></tr>
<tr><td>1</td><td>High</td><td>1.80</td><td rowspan="3">5.26</td><td rowspan="3">14.70</td><td rowspan="3">0.38</td><td rowspan="3">E</td></tr>
<tr><td>1</td><td>Moderate</td><td>3.54</td></tr>
<tr><td>1</td><td>Unzoned</td><td>15.01</td></tr>
<tr><td>2</td><td>High</td><td>7.67</td><td rowspan="2">11.46</td><td rowspan="2">15.37</td><td rowspan="2">0.08</td><td rowspan="2">E</td></tr>
<tr><td>2</td><td>Unzoned</td><td>15.54</td></tr>
<tr><td>3</td><td>Very High</td><td>2.88</td><td rowspan="3">4.03</td><td rowspan="3">0.00</td><td rowspan="3">0.00</td><td rowspan="3">E</td></tr>
<tr><td>3</td><td>High</td><td>0.00</td></tr>
<tr><td>3</td><td>Moderate</td><td>1.15</td></tr>
<tr><td>4</td><td>High</td><td>9.69</td><td rowspan="2">10.22</td><td rowspan="2">1.11</td><td rowspan="2">0.00</td><td>E</td></tr>
<tr><td>4</td><td>Moderate</td><td>0.53</td><td>E</td></tr>
<tr><td>5</td><td>High</td><td>2.06</td><td rowspan="2">2.25</td><td rowspan="2">0.75</td><td rowspan="2">0.00</td><td rowspan="2"></td></tr>
<tr><td>5</td><td>Moderate</td><td>0.94</td></tr>
</table>
*Abbreviations:
FRA: Federal Responsibility Area
LRA: Local Responsibility Area
FTA: Fire Threat Area
SRA: State Responsibility Area</td></tr>
<tr><td colspan="7">5.13 Noise</td></tr>
<tr><td>Section 5.13.4.2.1
Table 5.13-3
Page 5-257</td><td>DN5.5</td><td>Issue: There are several inconsistencies between the construction noise levels depicted in Table 5.13-3 and the primary equipment descriptions in Table 3.6-1. The following inconsistencies were found:</td><td></td><td>X</td><td></td><td>Table 5.13-3 has been modified to correspond with Table 3.6-1; see below.</td></tr>
</table>

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		Table 3.6-1 included several primary equipment descriptions (with a detailed list of equipment) that was not listed in Table 5-13.3 including **Install TSP H-frame Foundation, TSP H-frame Haul, TSP H-frame Assembly, TSP H-frame Erection, LWS H-frame Haul, LWS H-frame Assembly, Install LWS H-frame and Telecommunications Underground Infrastructure Installation** For equipment required for the **Staging Area**, Table 5.13-3 did not list a Generator (as listed in Table 3.6-1). Table 5.13-3 listed a Jet A Fuel Truck that was not listed in Table 3.6-1 For equipment required for the **TSP Erection**, Table 5.13-3 did not list a Jet A Fuel Truck or a Helicopter Support Truck (as listed in Table 3.6-1). For equipment required for the **Install LWS Pole**, Table 5.13-3 did not list a Jet A Fuel Truck or a Helicopter Support Truck (as listed in Table 3.6-1). For equipment required for the **Existing Lattice Structure/TSP Removal,** Table 5.13-3 did not list a Jet A Fuel Truck or a Helicopter Support Truck (as listed in Table 3.6-1). For equipment required for **Remove Conductor and OHGW and Install Conductor and OPGW/OHGW,** Table 5.13-3 did not list Boom/Crane Truck, Lowboy Truck/Trailer and Jet A Fuel Truck (as listed in Table 3.6- 1). Table 3.6-1 did not list Sleeving truck, R/T Crane, Flatbed Trailer, Bucket Truck, 22-Ton Manitex and Sag Cat with 2 winches (as listed in Table 5.13-3). **How to Address**: Include the missing items in Table 5.13-3 or update the Table 3.6-1 to provide consistency between the Noise Chapter and the Project **Description**.				The referenced trucks (Jet A Fuel Truck and Helicopter Support Truck) would not be located with other construction vehicles at the sites of TSP Erection, Install LWS Pole, or Existing Lattice Structure/TSP Removal. Therefore any noise generated by these trucks would not contribute to noise associated with the helicopter-supported construction activity.
5.14 Population and Housing						
Section 5.14.1.3.1, Page 5-266	**DN5.6**	**Issue:** The PEA is missing information on housing developments within 1 mile of the proposed project. The following information is not provided for the Grapevine Specific and Community Plan: v. Estimated population increase i. Contact information for the developer (provided in the public outreach appendix) **How to Address:** Include the information listed **above**.	X			5.14.1.3.1 Kern County Approved Housing Development—Grapevine Specific and Community Plan The project is an 8,010-acre master planned community located at the southern end of the San Joaquin Valley adjacent to the existing Tejon Ranch Commerce Center. It would provide a new residential community and employment center that would extend the range of economic development opportunities that currently exist in the Tejon Ranch Commerce Center and would provide options for housing and services for the existing employees of both the project site and the adjacent Tejon Ranch Commerce Center. The project involves entitlements that would allow for 12,000 dwelling units; an additional 2,000 dwelling units may be permitted. The estimated net population increase at buildout is 38,400 people. Development was approved in December 2019; construction schedule is unknown. The developer is as follows: Tejon Ranch Company, 4436 Lebec Road, Tejon Ranch, CA 93243.
Section 5.14.1.3.2, Page 5-266	**DN5.7**	**Issue:** The PEA is missing information on housing developments within 1 mile of the proposed project. The following information is not provided for the Centennial Specific Plan: i. Location of the project i. Number of units and estimated population increase t. Contact information for the developer (provided in the public outreach appendix) **How to Address:** Include the information listed above.	X			5.14.1.3.2 Los Angeles County Approved Housing Development—Centennial Specific Plan The Centennial Specific Plan was adopted by the Los Angeles County Board of Supervisors on April 30, 2019 and became effective on May 30, 2019. The Specific Plan authorizes the development of a new master-planned community of 19,333 residences located east of Gorman Substation. Once fully built-out, the population is estimated to be 57,000 people. Development was approved in April 2019; construction schedule is unknown. The developer is as follows: Tejon Ranch

▪ SCE GKR Project Application Needs

PEA Needs Section or Page #	Comment Code	Deficiency	Quick	Mid-Term	Long-Term	Response/Modified Text
						Company, 4436 Lebec Road, Tejon Ranch, CA 93243.
5.19 Utilities and Service Systems						
Section 5.19.4.1.6.1 Page 5-310	**DN5.8**	**Issue:** The PEA does not substantiate why construction would not increase the rate of corrosion of adjacent utility lines as a result of alternating current impacts. **How to address:** Update the PEA to support the claim that construction would not increase the rate of corrosion of adjacent utility lines.			X	SCE presumes the inquiry to be tied to the rate of corrosion related to operations. Construction activities occur primarily at the surface, are short-term activities, and do not generate any subtransmission-level alternating current. Therefore, there would be no increase to any rate of corrosion (if present) from the construction activities described in Chapter 3. Once the circuits are energized (i.e., during the operational phase of the GKR Project), then alternating current will be generated; this is addressed in the 'Operations' section (5.19.4.1.6.2).
5.19.4.5.2 Separation Distance and Length of Collocation	**DN5.9**	**Issue:** Data missing for the unconnected utilities and other infrastructure **How to Address:** Please provide the GIS data for the "Unconnected Utilities and Other Infrastructure" identified on Figure 5.19-1 and described in Section 5.19.4.5.2.		X		GIS data is being updated and will be provided under separate electronic cover. **SENT**

Table 5.3-4. Estimated Annual Construction Emissions, Controlled

Construction Year	VOC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	CO
2024 (tpy)	0.2	~~2~~ 2.1	~~0.007~~ 0.0073	~~4~~ 1.9	~~0.5~~ 0.3	~~1~~ 1.5
2025 (tpy)	0.9	~~7~~ 7.7	0.032	~~9~~ 6.9	~~1.1~~ 0.9	~~6~~ 6.9
2026 (tpy)	~~0.881~~ 1.4	~~5.07~~ 5.5	~~0.021~~ 0.025	~~7.0~~ 5.2	~~0.89~~ 0.8	~~5.41~~ 6.5

Abbreviations:

tpy = tons per year

Table 5.3-5. Estimated Annual Construction Emissions, Uncontrolled

Construction Year	VOC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	CO
2024 (tpy)	0.2	~~2~~ 2.1	~~0.007~~ 0.0073	~~60~~ 26	~~6.1~~ 2.6	~~1~~ 1.5
2025 (tpy)	0.9	~~7~~ 7.7	0.032	~~127~~ 200	~~13.0~~ 10	~~6~~ 6.9
2026 (tpy)	~~0.881~~ 1.4	~~5.07~~ 5.5	~~0.021~~ 0.025	~~103.2~~ 68	~~10.49~~ 7.0	~~5.41~~ 6.5

Table 5.3-6. Estimated District Annual Construction Emissions, Controlled

	VOC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	CO
SJVAPCD						
Annual Emissions (tpy)	~~0.7~~ 1.2	~~6.0~~ 6.4	~~0.027~~ 0.026	~~7.2~~ 5.8	~~0.9~~ 0.8	~~5.2~~ 5.8
Significance Threshold (tpy)	10	10	27	15	15	100
Exceedance?	**No**	**No**	**No**	**No**	**No**	**No**
EKAPCD						
Annual Emissions (tpy)	~~0.1~~ 0.2	1.0	0.004	~~1.2~~ 0.9	0.1	~~0.8~~ 0.9
Significance Threshold (tpy)	25	25	27	15	None	None
Exceedance?	**No**	**No**	**No**	**No**	**No**	**No**

Table 5.3-7. Estimated District Annual Construction Emissions, Uncontrolled

District	VOC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	CO
SJVAPCD						
Annual Emissions (tpy)	~~0.7~~ 1.2	~~6.0~~ 6.4	~~0.027~~ 0.026	~~106.6~~ 84	~~10.8~~ 8.6	~~5.2~~ 5.8
Significance Threshold (tpy)	10	10	27	15	15	100
Exceedance?	**No**	**No**	**No**	**Yes**	**No**	**No**
EKAPCD						
Annual Emissions (tpy)	~~0.1~~ 0.2	1.0	0.004	~~17.1~~ 13	~~1.7~~ ~~1.4~~	0.8
Significance Threshold (tpy)	25	25	27	15	None	None

Exceedance?	**No**	**No**	**No**	**~~Yes~~ No**	**No**	**No**

Table 5.3-8. Estimated Daily Construction Emissions, Controlled

Construction Year	**VOC**	**NO_x**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**	**CO**
2024 (ppd)	~~6~~ 5.6	84	~~0.4~~ 0.40	~~54~~ 21	~~9~~ 4.3	~~25~~ 27
2025 (ppd)	8	56	~~0.3~~ 0.32	~~26~~ 23	~~4~~ 4.2	~~34~~ 36
2026 (ppd)	~~16~~ 20	46	~~0.2~~ 0.28	~~28~~ 8.4	~~4~~ 6.3	~~57~~ 63
Maximum	**~~16~~ 20**	**84**	**~~0.4~~ 0.40**	**~~54~~ 23**	**~~9~~ 6.3**	**~~57~~ 63**
Significance Threshold (ppd)	75	100	550	150	55	550
Exceedance?	**No**	**No**	**No**	**No**	**No**	**No**

Table 5.3-9. Estimated Daily Construction Emissions, Uncontrolled

Construction Year	**VOC**	**NO_x**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**	**CO**
2024 (ppd)	~~6~~ 5.6	84	~~0.4~~ 0.40	~~304~~ 98	~~34~~ 12	~~25~~ 27
2025 (ppd)	8	56	~~0.3~~ 0.32	~~134~~ 113	~~15~~ 13	~~34~~ 36
2026 (ppd)	~~16~~ 20	46	~~0.2~~ 0.28	~~143~~ 193	~~16~~ 22	~~57~~ 46
Maximum	**~~16~~ 20**	**84**	**~~0.4~~ 0.40**	**~~304~~ 193**	**~~34~~ 22**	**~~57~~ 46**
Significance Threshold (ppd)	75	100	550	150	55	550
Exceedance?	**No**	**No**	**No**	**Yes**	**No**	**No**

Table 5.3-10. Estimated Localized Construction Emissions

Construction Year	**NO_x**	**PM_{10}**	**$PM_{2.5}$**	**CO**
2024	~~24~~ 23	~~3~~ 2.5	~~1~~ 1.0	~~19~~ 21
2025	~~24~~ 23	~~2~~ 1.6	~~1~~ 0.90	~~25~~ 23
2026	39	~~2~~ 2.2	~~1~~ 1.5	~~39~~ 41
Maximum	39	~~3~~ 2.5	~~1~~ 1.5	~~39~~ 41
Significance Threshold (ppd)	236	38	8	2,095
Exceedance?	**No**	**No**	**No**	**No**

5.8.4.1.1 Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

5.8.4.1.1.1 Construction and Operation

Less than Significant Impact. GHG emissions would be generated from operation of heavy equipment, support vehicles and helicopters. The most common GHGs associated with fuel combustion are CO2, CH4, and N2O. Annual GHG emissions were estimated for construction activities using the CalEEMod model for both on-road and off-road sources. Helicopter emissions were estimated based on the Swiss Federal Office of Civil Aviation (FOCA) Guidance on the Determination of Helicopter Emissions (FOCA 2015).

Construction activities would result in emissions of GHG over the construction period. Construction activities would result in exhaust emissions from vehicular traffic, as well as from construction equipment and machinery. Over the construction period, approximately ~~4,495~~ 4,543 MTCO2e would be emitted. GHG construction emissions from future activities amortized over 30 years is approximately ~~150~~ 151 MTCO2e. As explained in Section 5.3, operational emissions would not differ in scope or scale from activities currently conducted. Thus, the estimated annual emission of GHGs from the operation of the infrastructure replaced under the GKR Project is unchanged from the current O&M-related emissions. Combined, the ~~150~~ 151 MTCO2e emissions associated with construction and operations would be well below the 10,000 MTCO2e threshold of significance established by the SCAQMD and the 25,000 MTCO2e threshold of significance established by the EKAPCD Addendum. Therefore, the GKR Project would not generate, either directly or indirectly, GHG emissions that would have a significant impact on the environment, and impacts would be less than significant.

5.8.4.1.2 Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

5.8.4.1.2.1 Construction

No Impact. Construction of the GKR Project would be consistent with applicable policies, plans, and regulations for reducing GHG emissions. The GKR Project would incorporate best management practices and other standard SCE practices, such as reducing the idle time of construction vehicles, that are consistent with the requirements and intentions of the federal and state plans, polices, and regulations. Construction activities would not be expected to consume a substantial amount of energy that would result in a conflict with policies that serve to reduce GHG emissions through a reduction in energy consumption. As presented above, GHG construction emissions from activities amortized over 30 years would be approximately ~~150~~ 151 MTCO2e. GHG emissions would fall well below the SCAQMD and EKAPCD numerical thresholds of significance. Therefore, the GKR Project would not conflict with any applicable plan, policy, or regulation, and no impact would occur under this criterion.

Table 5.13-3. Construction Noise Levels

Equipment Required	Equipment Noise Level (Leq; 50 feet)	Phase Noise Level (Leq; 50 feet)	Phase Duration at Each Location	Receptor Nearest to Construction Phase	Noise Level at Nearest Receptor (Leq)	Exceeds Noise Standard at Nearest Receptor?	Distance to Not Exceed Standard
Survey							
1-Ton Truck, 4x4	80	80	1 day	Residence, 127 feet from work areas near Gorman Substation	72	No	IR
Staging Area							
1-Ton Truck, 4x4	80	91	180 days	None	N/A	N/A	N/A
R/T Forklift	85						
Boom/Crane Truck	85						
Water Truck	84						
Generator	65						
Truck, Semi-Tractor	84						
Road Work							
1-Ton Truck, 4x4	80	93	1 day	Residence, 127 feet from work areas near Gorman Substation	85	Yes	IR
Backhoe/Front Loader	80						
Track Type Dozer	85						
Motor Grader	85						
Water Truck	84						
Drum Type Compactor	85						
Excavator	85						
Lowboy Truck/Trailer	84						
TSP Foundation							
3/4-Ton Truck, 4x4	80	92	2 days	Residence, 127 feet from work areas near Gorman Substation	84	Yes	IR
Boom/Crane Truck	85						
Backhoe/Front Loader	80						
Auger Truck	84						
Water Truck	84						
Dump Truck	84						
Concrete Mixer Truck	85						
TSP Haul							
3/4-Ton Truck, 4x4	80	90	¼ day	Residence, 127 feet from work areas near Gorman Substation	82	Yes	IR
Boom/Crane Truck	85						
Flat Bed Pole Truck	84						
Water Truck	84						
TSP Assembly							
3/4-Ton Truck, 4x4	80	89	1 day	Residence, 127 feet from work areas near Gorman Substation	81	Yes	IR
1-Ton Truck, 4x4	80						
Water Truck	84						
Compressor Trailer	65						
Boom/Crane Truck	85						
TSP Erection							
3/4-Ton Truck, 4x4	80	98	1 day	Residence, 127 feet from work areas near Gorman Substation	90	Yes	IR
1-Ton Truck, 4x4	80						
Water Truck	84						
Compressor Trailer	65						
R/T Crane	85						
Heavy-duty Helicopter	97						
LWS Pole Haul							
3/4-Ton Truck, 4x4	80	90	¼ day	Residence, 470 feet	71	Yes	IR
Water Truck	84						
Boom/Crane Truck	85						
Flat Bed Pole Truck	84						

LWS Pole Assembly							
3/4-Ton Truck, 4x4	80	89	¼ day	Residence, 470 feet	70	Yes	IR
Compressor Trailer	65						
1-Ton Truck, 4x4	80						
Water Truck	84						
Boom/Crane Truck	85						
Install LWS Pole							
1-Ton Truck, 4x4	80	98	¼ day	Residence, 470 feet	79	Yes	IR
Manlift/Bucket Truck	85						
Boom/Crane Truck	85						
Auger Truck	84						
Water Truck	84						
Backhoe/Frontloader	80						
Extendable Flat Bed Pole Truck	84						
Medium-duty Helicopter	97						
Existing Pole Removal							
1-Ton Truck, 4x4	80	91	¼ day	Residence, 127 feet from work areas near Gorman Substation	83	Yes	IR
Compressor Trailer	65						
Manlift/Bucket Truck	85						
Boom/Crane Truck	85						
Flat Bed Pole Truck	84						
Water Truck	84						
Existing Lattice Structure/TSP Removal							
1-Ton Truck, 4x4	80	99	2 days	Residence, 127 feet from work areas near Gorman Substation	91	Yes	IR
Compressor Trailer	65						
Manlift/Bucket Truck	85						
Backhoe/Front Loader	80						
Boom/Crane Truck	85						
Flat Bed Pole Truck	84						
Water Truck	84						
Medium-duty Helicopter	97						
Dump Truck	84						
Excavator	85						
R/T Crane (M)	85						
R/T Crane (L)	85						
Install/Remove Conductor/OPGW/OHGW							
3/4-Ton Truck, 4x4	80	97	20 days	Residence, 127 feet from work areas near Gorman Substation	90	Yes	IR
1-Ton Truck, 4x4	80						
Manlift/Bucket Truck	85						
Boom/Crane Truck	85						
Dump Truck	84						
Wire Truck/Trailer	84						
Sock Line Puller	84						
Bull Wheel Puller	84						
Hydraulic Rewind Puller	84						
Static Truck/ Tensioner	84						
Backhoe/Front Loader	80						
Truck, Semi-Tractor	84						
Lowboy Truck/Trailer	84						
Water Truck	84						
Light Helicopter	90						
Conductor Splicing Rig	84						
Fiber Splicing Lab	84						
~~**Remove Conductor and OHGW**~~							
~~1 Ton Truck, 4x4~~	~~80~~	~~93~~	~~20 days~~	~~Residence, 127 feet from work~~	~~85~~	~~Yes~~	~~IR~~
~~Manlift/Bucket Truck~~	~~85~~						

~~Sleeving Truck~~	~~84~~			~~areas near Gorman Substation~~			
~~R/T Crane~~	~~85~~						
~~Flatbed Trailer~~	~~0~~						
~~Truck, Semi-tractor~~	~~84~~						
~~Bull Wheel Puller~~	~~84~~						
~~Water Truck~~	~~84~~						
~~Hydraulic Rewind Puller~~	~~84~~						
~~Install Conductor and OHGW~~							
~~¾ Ton Truck, 4x4~~	~~80~~	~~97~~	~~20 days~~	~~Residence, 127 feet from work areas near Gorman Substation~~	~~89~~	~~Yes~~	~~IR~~
~~1 Ton Truck, 4x4~~	~~80~~						
~~Wire Truck/Trailer~~	~~84~~						
~~R/T Crane~~	~~85~~						
~~Dump Truck~~	~~84~~						
~~Bucket Truck~~	~~85~~						
~~22 Ton Manitex~~	~~85~~						
~~Splicing Rig~~	~~84~~						
~~Splicing Lab~~	~~84~~						
~~Sock Line Puller~~	~~84~~						
~~Bull Wheel Puller~~	~~84~~						
~~Backhoe/Front Loader~~	~~80~~						
~~D8 Caterpillar~~	~~82~~						
~~Light-duty Helicopter~~	~~90~~						
~~Fuel, Helicopter Support Truck~~	~~84~~						
~~Sag Cat with 2 winches~~	~~82~~						
~~Static Truck/Tensioner~~	~~84~~						
Install/Remove Guard Structures							
3/4-Ton Truck, 4x4	80	92	½ day	N/A; no guard structures to be installed in Los Angeles County	80	Yes	IR
1-Ton Truck, 4x4	80						
Compressor Trailer	65						
Backhoe/Front Loader	80						
Water Truck	84						
Manlift/Bucket Truck	85						
Boom/Crane Truck	85						
Auger Truck	84						
Extendable Flat Bed Pole Truck	84						
~~Remove Guard Structures~~							
~~3/4 Ton Truck, 4x4~~	~~80~~	~~92~~	~~½ day~~	~~N/A; no guard structures to be installed in Los Angeles County~~	~~80~~	~~Yes~~	~~IR~~
~~1 Ton Truck, 4x4~~	~~80~~						
~~Compressor Trailer~~	~~65~~						
~~Backhoe/Front Loader~~	~~80~~						
~~Water Truck~~	~~84~~						
~~Manlift/Bucket Truck~~	~~85~~						
~~Boom/Crane Truck~~	~~85~~						
~~Auger Truck~~	~~84~~						
~~Extendable Flat Bed Pole Truck~~	~~84~~						
Telecommunications Underground Infrastructure Installation							
1-Ton Truck, 4x4	80	91	2 days	Residence, 127 feet from work areas near Gorman Substation	83	Yes	IR
Backhoe/Front Loader	80						
Dump Truck	84						
Pipe Truck/Trailer	84						
Concrete Mixer Truck	85						
Water Truck	84						
Compressor Trailer	65						
Lowboy Truck/Trailer	84						
Restoration							
1-Ton Truck, 4x4	80	91	1 day		83	Yes	IR

Backhoe/Front Loader	80			Residence, 127 feet from work areas near Gorman Substation			
Motor Grader	85						
Water Truck	84						
Drum Type Compactor	85						
Lowboy Truck/Trailer	84						

NOTE: There are no established noise level standards applicable to Project-related construction activities in unincorporated Kern County, the City of Arvin, or the City of Bakersfield; therefore, work in these jurisdictions would not generate noise in excess of established standards and work in these areas is not addressed in this Table. Only work in Los Angeles County is accounted for here.

IR. SCE cannot relocate its structures, nor can SCE relocate a noise sensitive receptor or land use.

Table 3.5-5. Types, Uses and Volumes of Hazardous Materials

Hazardous Material Type	Use	Approximate Volume (gallons)
Diesel	Engine fuel	Please see Table 5.6-1
Gasoline	Engine fuel	Please see Table 5.6-1
Lubricants/Hydraulic Fluids	Engine and equipment lubrication/ Powering hydraulic equipment	21,700~~753~~
Miscellaneous Construction Fluids (solvents, etc.)	Cleaning/lubricating hardware, etc.	1,100~~088~~

Notes:
Diesel and gasoline volumes developed through California Emissions Estimator Model® (CalEEMod)
Lubricants/hydraulic fluids consumption assumed at approximately 5 percent of non-aviation fuel consumption.
Miscellaneous construction fluid volumes assumed at approximately 5 percent of Lubricants/Hydraulic Fluids volume.

Table 3.6-1. Construction Equipment and Workforce

Work Activity				Activity Production			
Primary Equipment Description	Estimated Equipment Horse-Power	Probable Fuel Type	Primary Equipment Quantity	Estimated Workforce	Estimated Schedule (Days)	Duration of Use (Hrs/Day)	Estimated Production Per Day
Survey				**4**	**Duration Of Project**		
1-Ton Truck, 4x4	300	Diesel	2	—	Duration of Project	10	N/A
Staging Areas				**5**	**Duration Of Project**		
1-Ton Truck, 4x4	300	Diesel	4	—	Duration of Project	4	N/A
R/T Forklift	350	Diesel	4			5	
Boom/Crane Truck	350	Diesel	4			5	
Generator	45	Diesel	4			10	
Water Truck	300	Diesel	8			10	
Truck, Semi-Tractor	500	Diesel	4			6	
Road Work				**6**	**84**		**84 Miles**
1-Ton Truck, 4x4	300	Diesel	2	—	84	5	1 mile/day
Backhoe/Front Loader	350	Diesel	1		84	7	
Track Type Dozer	350	Diesel	1		84	7	
Motor Grader	350	Diesel	1		84	5	
Water Truck	300	Diesel	2		84	10	
Drum Type Compactor	250	Diesel	1		84	5	
Excavator	300	Diesel	1		42	7	
Lowboy Truck/Trailer	500	Diesel	1		42	4	
Install TSP Foundations				**5**	**238**		**119 TSPs**
3/4-Ton Truck, 4x4	275	Gas	2	—	238	5	0.5 TSP
Boom/Crane Truck	350	Diesel	1		238	7	
Backhoe/Front Loader	200	Diesel	1		238	10	
Auger Truck	500	Diesel	1		179	10	
Water Truck	350	Diesel	1		238	10	
Dump Truck	350	Diesel	1		238	10	
Concrete Mixer Truck	425	Diesel	2		179	6	
TSP Haul				**5**	**30**		**119 TSPs**
3/4-Ton Truck, 4x4	275	Gas	2	—	30	8	4 TSPs

Boom/Crane Truck	350	Diesel	1		30	8	
Flat Bed Pole Truck	400	Diesel	2		30	10	
Water Truck	350	Diesel	1		30	10	
TSP Assembly				**5**	**119**		**119 TSPs**
3/4-Ton Truck, 4x4	275	Gas	2	—	119	6	1 TSP
1-Ton Truck, 4x4	300	Diesel	2		119	6	
Water Truck	350	Diesel	1		119	10	
Compressor Trailer	60	Diesel	1		119	6	
Boom/Crane Truck	350	Diesel	1		119	7	
TSP Erection				5	**119**		**119 TSPs**
3/4-Ton Truck, 4x4	275	Gas ~~Diesel~~	1	—	119	6	1 TSP
1-Ton Truck, 4x4	300	Diesel	1		119	6	
Water Truck	350	Diesel	1		119	10	
Compressor Trailer	60	Diesel	1		119	6	
R/T Crane	350	Diesel	1		119	7	
Jet A Fuel Truck	300	Diesel	1		12	4	
Helicopter Support Truck	300	Diesel	1		12	6	
Heavy-duty Helicopter		Jet A	1		12	1	
Install TSP H-frame Foundations				**5**	**8**		**4 TSP H-frames**
3/4-Ton Truck, 4x4	275	Gas	2	—	8	5	0.5 TSP
Boom/Crane Truck	350	Diesel	1		8	7	
Backhoe/Front Loader	200	Diesel	1		8	10	
Auger Truck	500	Diesel	1		6	10	
Water Truck	350	Diesel	1		8	10	
Dump Truck	350	Diesel	1		8	10	
Concrete Mixer Truck	425	Diesel	2		6	6	
TSP H-frame Haul				**5**	**4**		**4 TSP H-frames**
3/4-Ton Truck, 4x4	275	Gas	2	—	4	8	1 TSP H-frame
Boom/Crane Truck	350	Diesel	1		4	8	
Flat Bed Pole Truck	400	Diesel	2		4	10	
Water Truck	350	Diesel	1		4	10	
TSP H-frame Assembly				**5**	**8**		**4 TSP H-frames**
3/4-Ton Truck, 4x4	275	Gas	2	—	8	6	0.5 TSP H-frame
1-Ton Truck, 4x4	300	Diesel	2		8	6	
Water Truck	350	Diesel	1		8	10	
Compressor Trailer	60	Diesel	1		8	6	
Boom/Crane Truck	350	Diesel	1		8	7	
TSP H-frame Erection				**5**	**8**		**4 TSP H-frames**
3/4-Ton Truck, 4x4	275	Gas	1	—	8	6	0.5 TSP H-frame
1-Ton Truck, 4x4	300	Diesel	1		8	6	
Water Truck	350	Diesel	1		8	10	
Compressor Trailer	60	Diesel	1		8	6	
R/T Crane	350	Diesel	1		8	7	
Jet A Fuel Truck	300	Diesel	1		1	4	
Helicopter Support Truck	300	Diesel	1		1	6	
Heavy-duty Helicopter		Jet A	1		1	1	
Existing Pole Removal				**5**	**37**		**145 Poles**
1-Ton Truck, 4x4	300	Diesel	2	—	37	10	4 Poles
Compressor Trailer	60	Diesel	1		37	5	
Manlift/Bucket Truck	250	Diesel	1		37	8	
Boom/Crane Truck	350	Diesel	1		37	8	
Flat Bed Pole Truck	400	Diesel	1		37	10	
Water Truck	300	Diesel	1		37	10	
Existing Lattice Structure/TSP Removal				**5**	**802**		**401 TSPs/Lattice Structures**
1-Ton Truck, 4x4	300	Diesel	2	—	802	10	

Compressor Trailer	60	Diesel	1		802	5	0.5 TSPs or Lattice Steel Structures
Manlift/Bucket Truck	250	Diesel	1		802	8	
Backhoe/Front Loader	125	Diesel	2		802	10	
Boom/Crane Truck	350	Diesel	1		802	8	
Flat Bed Pole Truck	400	Diesel	1		802	10	
Water Truck	300	Diesel	1		802	10	
Jet A Fuel Truck	300	Diesel	1		80	4	
Helicopter Support Truck	300	Diesel	1		80	6	
Medium-duty Helicopter		Jet A	1		80	4 ~~6~~	
Dump Truck	350	Diesel	1		802	10	
Excavator	250	Diesel	1		802	10	
R/T Crane (M)	215	Diesel	1		802	5	
R/T Crane (L)	300	Diesel	1		802	7	
LWS Pole Haul				**5**	**85**		**338 LWS Poles**
3/4-Ton Truck, 4x4	275	Gas	1		85	10	4 Poles
Water Truck	300	Diesel	1		85	10	
Boom/Crane Truck	350	Diesel	1	—	85	8	
Flat Bed Pole Truck	400	Diesel	1		85	10	
LWS Pole Assembly				**5**	**85**		**338 LWS Poles**
3/4-Ton Truck, 4x4	275	Gas	2		85	6	4 Poles
Compressor Trailer	60	Diesel	1		85	6	
1-Ton Truck, 4x4	300	Diesel	2	—	85	10	
Water Truck	350	Diesel	1		85	10	
Boom/Crane Truck	350	Diesel	1		85	8	
Install LWS Pole				**5**	**85**		**338 LWS Poles**
1-Ton Truck, 4x4	300	Diesel	1		85	6	4 Poles
Manlift/Bucket Truck	350	Diesel	1		85	10	
Boom/Crane Truck	350	Diesel	1		85	7	
Auger Truck	210	Diesel	1		85	8	
Water Truck	300	Diesel	1		85	10	
Backhoe/Frontloader	125	Diesel	1	—	85	10	
Extendable Flat Bed Pole Truck	400	Diesel	1		85	6	
Jet A Fuel Truck	300	Diesel	1		9	4	
Helicopter Support Truck	300	Diesel	1		9	6	
Medium-duty Helicopter		Jet A	1		9	4 ~~6~~	
LWS H-frame Haul				**5**	**6**		**11 H-frames**
3/4-Ton Truck, 4x4	275	Gas	1		6	10	2 H-frames
Water Truck	300	Diesel	0.5		6	10	
Boom/Crane Truck	350	Diesel	1	—	6	8	
Flat Bed Pole Truck	400	Diesel	1		6	10	
LWS H-frame Assembly				**5**	**6**		**11 H-frames**
3/4-Ton Truck, 4x4	275	Gas	2		6	6	2 H-frames
Compressor Trailer	60	Diesel	1		6	6	
1-Ton Truck, 4x4	300	Diesel	2	—	6	10	
Water Truck	350	Diesel	1		6	10	
Boom/Crane Truck	350	Diesel	1		6	8	
Install LWS H-frame				**5**	**6**		**11 H-frames**
1-Ton Truck, 4x4	300	Diesel	1		6	6	2 H-frames
Manlift/Bucket Truck	350	Diesel	1		6	10	
Boom/Crane Truck	350	Diesel	1		6	7	
Auger Truck	210	Diesel	1	—	6	8	
Water Truck	300	Diesel	1		6	10	
Backhoe/Frontloader	125	Diesel	1		6	10	
Extendable Flat Bed Pole Truck	400	Diesel	1		6	6	
Install/Remove Conductor/OPGW/OHGW				**20**	**217**		**65 Linear Miles**
3/4-Ton Truck, 4x4	275	Gas	1	—	217	10	0.3 Miles/day

1-Ton Truck, 4x4	300	Diesel	2		217	10	
Manlift/Bucket Truck	250	Diesel	1		217	10	
Boom/Crane Truck	350	Diesel	1		217	10	
Dump Truck	350	Diesel	1		143	10	
Wire Truck/Trailer	350	Diesel	2		109	10	
Sock Line Puller	300	Diesel	1		55	10	
Bull Wheel Puller	350	Diesel	1		109	10	
Hydraulic Rewind Puller	350	Diesel	1		217	10	
Static Truck/ Tensioner	350	Diesel	1		217	10	
Backhoe/Front Loader	125	Diesel	1		55	8	
Truck, Semi-Tractor	400	Diesel	2		217	10	
Lowboy Truck/Trailer	450	Diesel	2		217	10	
Water Truck	300	Diesel	1		217	10	
Jet A Fuel Truck	300	Diesel	1		109	4	
Helicopter Support Truck	300	Diesel	1		109	7	
Light Helicopter		Jet A	1		109	5 ~~7~~	
Conductor Splicing Rig	350	Diesel	1		55	10	
Fiber Splicing Lab	300	Diesel	1		55	10	
Install/Remove Guard Structures				**5**	**39**		**194 Structures**
3/4-Ton Truck, 4x4	275	Gas	2		39	8	
1-Ton Truck, 4x4	300	Diesel	2		39	8	
Compressor Trailer	60	Diesel	2		39	7	
Backhoe/Front Loader	125	Diesel	1		39	10	
Water Truck	300	Diesel	1	—	39	5	5 Structures
Manlift/Bucket Truck	250	Diesel	1		39	8	
Boom/Crane Truck	350	Diesel	1		39	10	
Auger Truck	500	Diesel	1		39	8	
Extendable Flat Bed Pole Truck	400	Diesel	1		39	8	
Telecommunications Underground Infrastructure Installation				**6**	**5**		**600 Feet**
1-Ton Truck, 4x4	300	Diesel	2		5	4	
Backhoe/Front Loader	125	Diesel	1		5	6	
Dump Truck	350	Diesel	2		5	6	
Pipe Truck/Trailer	275	Diesel	1		5	8	
Concrete Mixer Truck	350	Diesel	3	—	5	2	125 Feet/Day
Water Truck	300	Diesel	1		5	6	
Compressor Trailer	60	Diesel	1		5	4	
Lowboy Truck/Trailer	450	Diesel	1		5	4	
Restoration				**7**	**65**		**65 Miles**
1-Ton Truck, 4x4	300	Diesel	2		65	4	
Backhoe/Front Loader	125	Diesel	1		65	4	
Motor Grader	250	Diesel	1		65	6	
Water Truck	300	Diesel	1	—	65	8	1 Mile
Drum Type Compactor	100	Diesel	1		65	4	
Lowboy Truck/Trailer	450	Diesel	1		65	4	