California Public Utilities Commission

Gorman-Kern River 66 kV Project

Final Initial Study/Mitigated Negative Declaration

March 2025

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PANORAMA ENVIRONMENTAL, INC.

California Public Utilities Commission

Gorman-Kern River 66 kV Project

Final Initial Study/Mitigated Negative Declaration

March 2025

Prepared for:
California Public Utilities Commission
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PANORAMA ENVIRONMENTAL, INC.

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1 Introduction

1.1 CEQA Process

Pursuant to the requirements of the California Environmental Quality Act (CEQA) and California Public Utilities Commission (CPUC) General Order (GO) 131-D, the CPUC prepared an Initial Study (IS) to evaluate potential environmental impacts of the application from Southern California Edison (SCE) (A.22-02-014) for a Permit to Construct (PTC) the proposed Transmission Line Rating Remediation Gorman-Kern River 66 kV Project (Project). The IS determined that the Project would not have a significant adverse effect on the environment, and the CPUC prepared a Draft Mitigated Negative Declaration (Draft MND).

This Final IS/MND has been prepared pursuant to CEQA and the CEQA Guidelines,[1] which outline all aspects of the preparation of the Draft IS/MND and its review as well as the subsequent steps to preparing a Notice of Determination. This document incorporates comments received during the public review period and contains responses by the Lead Agency (the CPUC) to those comments. The comments received resulted in minor changes to the IS contained in the Draft IS/MND, and some additional minor changes were made to improve the clarity of the Draft IS/MND. Those changes are reflected in Final IS/MND Chapter 2, Comments and Responses, and Chapter 3, Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). Changes are shown using underline to denote new language and strike-through to denote deleted language. The Final IS/MND provides corrections and clarification to certain facts set forth in the Draft IS/MND and, where necessary, ensures accuracy. No new significant

[1] Public Resources Code section 21000 et seq.; Title 14, California Code of Regulations, chapter 3, sections 15000 through 15387 and Appendices, accessible at http://opr.ca.gov/ceqa/.

environmental impacts are identified in this Final IS/MND. Additionally, no mitigation measures presented in the Draft IS/MND were deleted in this Final IS/MND.

The Final IS/MND is an informational document prepared by the CPUC to be considered by decision makers before approving or denying a proposed project. Consistent with CEQA Guidelines section 15071, this Final IS/MND consists of the following:

a. A description of the Project (See Chapter 2, Project Description, of the Draft IS/MND in Appendix A)
b. The location of the Project and the name of Project components (See Chapter 2 of the Draft IS/MND in Appendix A)
c. A finding that the Project would not have a significant effect on the environment (See Section 1.3, below)
d. An IS documenting reasons to support this finding, updated to address comments received on the Draft IS/MND published November 22, 2024 (See Chapter 3 of the Draft IS/MND in Appendix A, as amended by Final IS/MND Chapter 2, Comments and Responses)
e. Mitigation Measures included in the Project to avoid potentially significant effects (see Final IS/MND Chapter 3, MMCRP)

1.2 Public Review Process

On November 22, 2024, the CPUC filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research (State Clearinghouse, SCH# 2024110564), published a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration, and released the Draft IS/MND for a 32-day public review period. The Draft IS/MND was distributed to federal, State, and local agency representatives, and the NOI was distributed to property owners within 1,000 feet of the Project. A legal notice was published on November 22, 2024, in the *Bakersfield Californian* announcing the availability of the Draft IS/MND for public review in compliance with CEQA.

In accordance with section 15105(b) of the CEQA Guidelines, the public review and comment period began on November 22, 2024, and ended on December 23, 2024. The CPUC established a Project email address (KernTLRR@panoramaenv.com) and Project website (https://ia.cpuc.ca.gov/environment/info/panoramaenv/Kern_River/index.html)

to enable the public to ask questions, provide comments, and obtain additional information on the Project analyzed in the Draft IS/MND. Copies of all written comments received on the Draft IS/MND are provided in Chapter 2 of this Final IS/MND

1.3 Findings

Based on the analysis conducted in this Final IS/MND, the CPUC has found, on the basis of the whole record before it (including all Project application materials, the Draft IS/MND, comments received, and other materials), that there is no substantial evidence that the Project would have a potential significant environmental impact. Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. Argument, speculation, and unsubstantiated opinion or narrative does not constitute substantial evidence (Pub. Res. Code § 21080(e); CEQA Guidelines § 15064(f)(5)). Project features and mitigation measures identified in the Final IS/MND to be required as a condition of certification of approval for the proposed Project would avoid or reduce all of the impacts to a less-than-significant level.

Eric Chiang 3/26/25

Eric Chiang, Project Manager DATE

Energy Division

California Public Utilities Commission

2 Comments and Responses

2.1 Introduction

This chapter includes copies of the comment letters received during the public review period on the Draft IS/MND for the proposed Transmission Line Rating Remediation Gorman-Kern River 66 kV Project (Project), Application A.22-02-014, and the responses to those comments.

2.2 Comments on the Draft MND

The CPUC received 18 comment letters from various state and local agencies, individual members of the public, and Southern California Edison (SCE). One comment letter was received after the close of the comment period; this comment was accepted and included in the Final MND. The CPUC has considered all comments and provides responses to all comments in this document.

2.3 List of Commenters and Summary of Comments

Agency and organization comments included topics such as technical clarifications and corrections, concerns regarding project need, and impacts on cultural and biological resources. Individual comments included concerns about post-construction project conditions. SCE comments included technical clarifications and corrections, provision of supplemental data, and minor changes to mitigation measures.

Table 2.3-1 lists the persons and agencies that submitted comments on the Draft MND. Comments within each comment letter are numbered; these comment numbers are also provided in **Table 2.3-1**. Each comment letter is followed by the corresponding responses. Comment letters are presented in the order received. The comment letters and comment responses are included in Section 2.4, below.

Comment letters are grouped in the following categories:

A. Public agencies and tribal governments
B. SCE (Applicant)
C. Private citizens
D. Form letters and petitions

Table 2.3-1 Commenters on the Draft Subsequent EIR and Corresponding Comment and Response Numbers

Comment letter designation	Date of letter	Commenter	Agency/organization	Response numbers
Public Agencies and Tribal Governments				
State				
A1	12/31/2024	Heather Vance	California Department of Fish and Wildlife	A1-1 through A1-51
Tribal Governments				
A2	12/16/2024	Eunice Ambriz	San Manuel Band of Mission Indians	A2-1
Applicant				
B1	12/23/2024	Lori Charpentier	Southern California Edison	B1-1 through B1-28
Private				
C1	11/21/2024	Dan M. Baer	Southern California Sunbelt Developers, Inc.	C1-1
Form Letter 1				
D1	12/1	Amber Bell	Resident	D1-1
D2	12/1	Susan Wilson	Resident	D1-1
D3	12/1	Christie Lee Weishaar	Resident	D1-1
D4	12/1	Sarah Boesler	Resident	D1-1
D5	12/2	Daniel Farewell	Resident	D1-1
D6	12/2	Jennifer Hensler	Resident	D1-1
D7	12/2	Danette Gaulrapp	Resident	D1-1
D8	12/2	Valentine Addington	Resident	D1-1

Comment letter designation	Date of letter	Commenter	Agency/organization	Response numbers
D9	12/2	Greg and Susan Williams	Resident	D1-1
D10	12/2	Ashleymarie Lively	Resident	D1-1
D11	12/2	Jennifer Sterk	Resident	D1-1
D12	12/3	Cindi Erakat	Resident	D1-1
D13	12/3	Tana Coffey	Resident	D1-1
D14	12/3	Dean Peterson	Resident	D1-1

2.4 Responses to Comments

This section contains responses to all of the substantive comments received on the IS/MND during the public review period from November 22, 2024, through December 23, 2024. Each substantive comment was assigned a comment number (e.g., A-1, A-2, etc.). The comment letter is reproduced in its entirety followed by the responses to each comment within the letter. The comments received resulted in minor revisions to the IS/MND, as addressed in this section.

2.4.1 Public Agencies and Tribal Governments

This section contains responses to comments received from tribal governments and public agencies. Comments are presented in the order they were received. Responses follow each comment letter.

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243 - 4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

December 31, 2024

Eric Chiang, Environmental Project Manager
California Public Utilities Commission
717 Market Street, Suite 400
San Francisco, California 94103
KernRiverTLRR@panoramaenv.com

Subject: Southern California Edison (SCE) Transmission Line Rating Remediation Gorman-Kern River 66kV Project (Project) Mitigated Negative Declaration (MND) State Clearinghouse No.: 2024110564

Dear Eric Chiang:

The California Department of Fish and Wildlife (CDFW) received a MND from the California Public Utilities Commission, as Lead Agency, for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. While the comment period may have ended, CDFW respectfully requests that California Public Utilities Commission still consider our comments.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection,

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802.). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in take as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research,
- Efforts to recover a fully protected, endangered, or threatened species, live capture, and relocation of a bird species for the protection of livestock, or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Additionally, specified types of infrastructure projects may be eligible for an Incidental Take Permit (ITP) for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code, § 2081.15). Project proponents should consult with CDFW early in the project planning process if an ITP may be pursued for a project.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include section 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), section 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird).

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or federal list to be

considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T under CEQA Guidelines section 15380, CDFW recommends that it be fully considered in the environmental analysis for the Project.

PROJECT DESCRIPTION SUMMARY

The Project includes activities to rebuild 65.3 miles of existing 66kV subtransmission circuits by removing and replacing existing subtransmission towers and poles, removing and replacing existing conductor, installing optical ground wire, and modifying existing substations facilities associated with the powerline located in Kern and Los Angeles counties. No new subtransmission lines or substations would be constructed as part of the Project.

Existing structures to be modified throughout the Project area include lattice steel towers, wood H-frames, two- and three-pole structures, tubular steel poles, insulators on structures, distribution under build, vaults or pull boxes to support the installation of optical ground wire/all-dialectric self-supporting fiber optic cable, and marker balls on overhead wires. Concrete foundations and/or micropile foundations will be used for tubular steel poles. Most light-weight steel structures would be directly buried to a depth of up to 30 feet. Optical ground wire would also be replaced and reused on structures and would be installed at the top of each substransmission structure, to provide lightening protection, grounding, and communications. All-dialectric self-supporting fiber optic cable would be installed below the conductor. Marker balls are visibility markers placed on overhead ground or optical ground wire to make the conductor crossings visible for aircraft pilots.

Modifications at Banducci 66-kV Substation, Gorman 66-kV Substation, and Kern River 1 Hydroelectric 66-kV Substation would include replacing conductors at existing positions, connecting optical ground wire to the ground grid, installing telecommunications equipment including new cable line within existing underground cable raceways, and installing new or replacing existing infrastructure within existing control buildings or mechanical-electrical equipment rooms.

Construction would be performed in work areas including helicopter landing zones and touchdown areas; temporary work pads for facility installation, modification, or removal; temporary guard structures; temporary pull-and-tension/stringing sites; and splice sites for conductor and overhead ground wire removal and installation.

Multiple staging sites would be utilized encompassing 133.8 acres. Staging area preparation would involve grubbing (i.e., vegetation removal) and/or minor grading to provide a flat and compacted surface for the application of gravel or crushed rock, with the exception of staging areas that are already asphalted or have a rock base. Any land that may be disturbed in a staging area would be returned to preconstruction conditions following construction completion.

Approximately 84 miles of existing access and spur road would be used and may require rehabilitation work, including regrading and repairing the existing roadbeds. Access and spur road would be cleared of vegetation, blade-graded to remove surface irregularities, and re-compacted. In some locations, temporary road base, plating, or matting may be used and removed at the end of construction. Additional improvements to the road may include road widening and installing new or repairing existing drainage structures. Approximately 2.4 miles of new overland access routes would be established. Helicopters would be used to support construction.

Proponent: Southern California Edison Company (SCE)

Objective: The objective of the Project is to ensure compliance with California Public Utilities Commission General Order 95 Rules For Overhead Electric Line Construction and will address reliability concerns related to the conditions of existing infrastructure on the affected subtransmission lines.

Location: The Project area is in unincorporated Kern County, unincorporated Los Angeles County, and the Kern County cities of Arvin and Bakersfield. The Project is divided into five segments:

- Segment 1 spans approximately 20.4 miles from the existing Kern River 1 Hydroelectric Substation to and including Structure M20-T3. The existing structures in Segment 1 support portions of the Gorman-Kern River 1 and Banducci-Kern River 1 66 kV subtransmission lines.
- Segment 2 spans approximately 26.5 miles from Structure M20-T3 to and including Structure M46-T6. The existing structures in Segment 2 support portions of the Gorman-Kern River 1 66 kV Subtransmission Line.
- Segment 3 spans approximately 4.1 miles from Structure M46-T6 to the existing Gorman Substation. The existing structures in Segment 3 support portions of the Gorman-Kern River 1 and Frazier Park-Gorman 66 kV subtransmission lines.
- Segment 4 spans approximately 11.3 miles from Structure M02-T3 to and including Structure M11-T3. The existing structures in Segment 4 support portions of the Banducci-Kern River 1 66 KV Subtransmission Line.
- Segment 5 spans approximately 3 miles from Pole X766E to the existing Banducci Substation. The existing structures in Segment 5 support portions of the Banducci-Kern River 1 66k V Subtransmission Line, distribution circuitry, and telecommunications infrastructure.

Timeframe: The Project would commence in 2026 and is anticipated to be constructed within approximately 23 months.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the California Public Utilities Commission in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Based on review of the Project description, review of the MND, review of the California Natural Diversity Database (CNDDB), and review of aerial imagery, multiple special status species could potentially be impacted by Project activities.

The MND acknowledges that the Project site is within the geographic range of many special-status animal and plant species, and multiple special-status animal and plant species have been identified in field surveys. The MND proposes specific mitigation measures to reduce impacts to less than significant; however, CDFW has concerns about the ability of some proposed mitigation measures to reduce impacts to less than significant and to avoid unauthorized take for multiple special-status species, including but not limited to those in Table 1.

Table 1: Special Status Species Potentially Impacted by the Project

Common Name	Scientific Name	State Status	Federal Status	California Rare Plant Rank
Plants				
Adobe yampah	*Perideridia pringlei*	---	---	4.3
Alkali mariposa-lily	*Calochortus striatus*	---	---	1B.2
Aromatic canyon gooseberry	*Ribes menziesii var. ixoderme*	---	---	1B.2
Bakersfield cactus	*Opuntia basilaris var. treleasei*	Endangered	Endangered	1B.1
Baja navarretia	*Navarretia peninsularis*	---	---	1B.2
Big Bear Valley woollypod	*Astragalus leucolobus*	---	---	1B.2
Calico monkeyflower	*Diplacus pictus*	---	---	1B.2
California jewelflower	*Caulanthus californicus*	Endangered	Endangered	1B.1
Comanche Point layia	*Layia leucopappa*	---	---	1B.1
Fort Tejon woolly sunflower	*Eriophyllum lanatum var. hallii*	---	---	1B.1
Horn's milk-vetch	*Astragalus hornii var. hornii*	---	---	1B.1
Kern mallow	*Eremalche parryi* ssp. *kernensis*	---	Endangered	1B.2
Lemmon's jewelflower	*Caulanthus lemmonii*	---	---	1B.2

Common Name	Scientific Name	State Status	Federal Status	California Rare Plant Rank
Lost Hills crownscale	*Atriplex coronate var. vallicola*	---	---	1B.2
Oil nestraw	*Stylocline citroleum*	---	---	1B.1
Palmer's mariposa lily	*Calochortus palmeri var. palmeri*	---	---	1B.2
Piute Mountains navarretia	*Navarretia setiloba*	---	---	1B.1
Robbins' nemacladus	*Nemacladus secundiflorus var. robbinsii*	---	---	1B.2
Rose-flowered larkspur	*Delphinium purpusii*	---	---	1B.3
San Bernardino aster	*Symphyotrichum defoliatum*	---	---	1B.2
San Joaquin adobe sunburst	*Pseudobahia peirsonii*	Endangered	Threatened	1B.1
San Joaquin bluecurls	*Trichostema ovatum*	---	---	4.2
San Joaquin woollythreads	*Monolopia congdonii*	---	Endangered	1B.2
Shevock's golden aster	*Heterotheca shevockii*	---	---	1B.3
Spiny-sepaled button-celery	*Eryngium spinosepalum*	---	---	1B.2
Striped adobe-lily	*Fritillaria striata*	Threatened	---	1B.1
Tehachapi monardella	*Monardella linoides* ssp. *oblonga*	---	---	1B.3
Tejon poppy	*Eschscholzia lemmonii* ssp. *kernensis*	---	---	1B.1
Tracy's eriastrum	*Eriastrum tracyi*	---	---	3.2
Vasek's clarkia	*Clarkia tembloriensis* ssp. *calientensis*	---	---	1B.1
Invertebrates				
Crotch's bumble bee	*Bombus crotchii*	Candidate	---	---
Amphibians				
Kern Canyon slender salamander	*Batrachoseps simatus*	Threatened	Proposed Threatened	---
Tehachapi slender salamander	*Batrachoseps stebbinsi*	Threatened	---	---
Western spadefoot	*Spea hammondii*	Species of Special Concern	Proposed Threatened	---
Reptiles				
Bakersfield legless lizard	*Anniella grinnelli*	Species of Special Concern	---	---
Blunt-nosed leopard lizard	*Gambelia sila*	Endangered	Endangered	---

Common Name	Scientific Name	State Status	Federal Status	California Rare Plant Rank
		Fully Protected		
California glossy snake	*Arizona elegans occidentalis*	Species of Special Concern	---	---
California legless lizard	*Anniella pulchra*	Species of Special Concern	---	---
Coastal whiptail	*Aspidoscelis tigris stejnegeri*	Species of Special Concern	---	---
Coast horned lizard	*Phrynosoma blainvillii*	Species of Special Concern	---	---
Northwestern pond turtle	*Actinemys marmorata*	Species of Special Concern	Proposed Threatened	---
San Joaquin coachwhip	*Masticophis flagellum ruddocki*	Species of Special Concern	---	---
Sierra night lizard	*Xantusia vigilis sierrae*	Species of Special Concern	---	---
Southern California legless lizard	*Anniella stebbinsi*	Species of Special Concern	---	---
Southern rubber boa	*Charina umbratical*	Threatened	---	---
Two-striped garter snake	*Thamnophis hammondii*	Species of Special Concern	---	---
Birds				
Bald eagle	*Haliaeetus leucocephalus*	Endangered Fully Protected	---	---
Common yellowthroat	*Geothlypis trichas*	Species of Special Concern	---	---
Golden eagle	*Aquila chrysaetos*	Fully Protected	---	---
Grasshopper sparrow	*Ammodramus savannarum*	Species of Special Concern	---	---
Loggerhead shrike	*Lanius ludovicianus*	Species of Special Concern	---	---
Long-eared owl	*Asio otus*	Species of Special Concern	---	---
Northern harrier	*Circus hudsonius*	Species of Special Concern	---	---
Purple martin	*Progne subis*	Species of Special Concern	---	---
Swainson’s hawk	*Buteo swainsoni*	Threatened	---	---
Tricolored blackbird	*Agelaius tricolor*	Threatened	---	---
Vaux’s swift	*Chaetura vauxi*	Species of Special Concern	---	---
Western burrowing owl	*Athene cunicularia hypugaea*	Candidate	---	---
Yellow warbler	*Setophaga petechia*	Species of Special Concern	---	---

Common Name	Scientific Name	State Status	Federal Status	California Rare Plant Rank
Mammals				
American badger	*Taxidea taxus*	Species of Special Concern	---	---
Pallid bat	*Antrozous pallidus*	Species of Special Concern	---	---
San Joaquin antelope squirrel	*Ammospermophilus nelsoni*	Threatened	---	---
San Joaquin kit fox	*Vulpes macrotis mutica*	Endangered	Threatened	---
Tehachapi pocket mouse	*Perognathus alticola inexpectatus*	Species of Special Concern	---	---
Tipton kangaroo rat	*Dipodomys nitratoides nitratoides*	Endangered	Endangered	---
Townsend's big-eared bat	*Corynorhinus townsendii*	Species of Special Concern	---	---
Western mastiff bat	*Eumops perotis californicus*	Species of Special Concern	---	---

COMMENT 1: Special Status Plants

The MND lists adobe yampah, Bakersfield cactus, calico monkeyflower, Kern mallow, Piute mountains navarretia, and San Joaquin bluecurls as present within the vicinity of the Project. Approximately 50 adobe yampah, 300 Bakersfield cactus, 150 Kern mallow, six Calico monkeyflower, 180 individuals and two populations (totaling 133 individuals) of Piute mountain navarettia, and 7,500 San Joaquin bluecurls were observed in 17 locations and were identified partially or entirely within work areas. Due to the large area of the Project site and as noted in the MND Master Species List, additional special status plant species have the potential to occur within and adjacent to the Project area. A1-1

The MND indicates that California Rare Plant Rank species that are ranked 3 and 4 were not considered during the MND analysis and information about the potential for these species to occur focuses on San Joaquin bluecurls and adobe yampah. CDFW recommends that all California Rare Plant Rank ranked 3 and 4 plants be analyzed in the MND due to their rare status and be included with the requirements for Mitigation Measure Biology-1. CDFW recommends adding the following mitigation measures addressing special status plant species to the MND.

Recommended Mitigation Measure 1: Special-Status Plant Surveys
CDFW recommends that the Project area be surveyed for special-status plants by a qualified botanist following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). This protocol, which is intended to maximize detectability, includes

identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. Please note that adverse conditions from yearly weather patterns may prevent botanical field surveyors from determining the presence of, or accurately identifying, some special status plants in the surveyed area. Disease, drought, predation, fire, herbivory, or other disturbance may also preclude presence or identification of special status plants in any given year. Visiting the survey site in more than one year increases the likelihood of detection. CDFW also recommends surveying areas according to elevation bands and/or habitat types, due to the long, linear configuration of the Project.

Recommended Mitigation Measure 2: Special-Status Plant Consultation and Take Authorization

If State endangered, threatened, or rare plants are identified during special status plant surveys, consultation with CDFW is recommended. If take cannot be avoided, then to ensure compliance with CESA and the Native Plant Protection Act (NPPA), CDFW recommends consultation with CDFW for acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b) and/or California Code of Regulations, Title 14, section 786.9, subdivision (b).

A1-2

Recommended Mitigation Measure 3: Salvage and Replanting Plan

The MND requires that if special-status species cannot be avoided, SCE must develop a Salvage and Replanting Plan for CDFW approval and that applicable take authorization from CDFW must also be acquired, prior to implementation of the Salvage and Replanting Plan. CDFW recommends that the Salvage and Replanting Plan include any requirements incorporated into any incidental take authorization, pursuant to CESA or NPPA.

The MND requires that the Salvage and Replanting Plan include a minimum 3-year period of maintenance and monitoring of relocated plants. CDFW recommends that maintenance and monitoring occur for five to 10 years, based on the specific species and due to the arid nature of the Project areas. The MND requires certain performance criteria to be incorporated into the Salvage and Replanting Plan; CDFW recommends that the MND also specify whether less than 100% success of relocated plantings is considered sufficient to keep impacts to less than significant levels. CDFW recommends that the MND also incorporate compensatory mitigation into the Salvage and Replanting Plan, based on the affected area of lost individuals or populations of special-status plants and consideration of the individual species impacted, as well as part of the contingency measures of the Salvage and Replanting Plan in the event that relocation is not successful.

A1-3

CDFW anticipates that recipient locations where salvaged plants will be installed would not result in impacts to any special status species, or if such impacts could occur, that the recipient planting locations will be considered part of the Project area

addressed by the MND and that all of the mitigation measures in the MND will apply to those activities. These could include but not be limited to ground disturbance from site preparation, non-native species removal, planting, watering, and other maintenance that is necessary until establishment criteria defined in the approved Salvage and Replanting Plan (including any take that is also addressed through CESA or NPPA) have been met.

COMMENT 2: Crotch's Bumble Bee (CBB)

The MND and MND Master Species List indicate that CBB has a high likelihood to occur and that foraging and nesting habitat is present throughout the majority of the Project area. CDFW concurs with Mitigation Measure Biology-4 for conducting focused surveys in suitable habitat, following the CDFW (2023) *Survey Considerations for CESA Candidate Bumble Bee Species*. CDFW also recommends that the following mitigation measures be included in the MND.

Recommended Mitigation Measure 4: CBB Avoidance
If CBB individuals or a nest is detected during surveys or at any time during the active period of April 1 to August 31, then CDFW recommends that all suitable habitat features for the species such as small mammal burrows, thatched/bunch grasses, brush piles, rock piles, and fallen logs be avoided by a minimum of 50 feet. Outside the active period, ground-disturbing activities cold result in impacts to queens overwintering underground. CDFW recommends that for Project work outside the active season, consultation with CDFW occur to discuss how to implement Project activities and avoid take. Any detection of CBB prior to or during Project implementation warrants consultation with CDFW.

Recommended Mitigation Measure 5: CBB Take Authorization
If take of CBB individuals and/or a nest cannot be avoided, for CESA compliance, CDFW recommends that an ITP pursuant to Fish and Game Code section 2081, subdivision (b), be acquired prior to initiating Project activities.

Recommended Mitigation Measure 6: CBB Habitat Restoration and Compensation
CDFW recommends that CBB be included in the Minimization Measure-Biology 2 list of special status for which disturbed habitat areas would be returned to pre-construction conditions. Habitat features that support CBB nesting may serve as nursery sites and CDFW recommends that losses of those features be identified and tracked, to inform restoration activities on the Project site, even if disturbance or removal occurs outside the CBB active period. CDFW also recommends that Mitigation Measure Biology-4 include a description of how habitat compensation for impacts to CBB habitat will be determined. Habitat replacement at a rate of one acre for each acre disturbed or removed would not clearly address temporal impacts or

A1-4

A1-5

A1-6

habitat fragmentation within the Project area and vicinity. The MND does not make clear when off-site mitigation for CBB would be required or what the basis will be for determining that replacement at a rate greater than one-to-one for impacted habitat would be required. CDFW recommends including those parameters in the MND to inform the mitigation requirement.

COMMENT 3: Kern County Slender Salamander (KCSS)

The MND Master Species List indicates that four KCSS individuals were observed during field surveys conducted in February and March of 2024 in Segment 1 along the Kern River in the Kern River Canyon. KCSS have seasonally restricted surface activity, shelter in underground burrows during unfavorable conditions, are typically nocturnal, and are found primarily under cover objects (U.S. Fish and Wildlife Service (USFWS) 2024). KCSS are highly sedentary with high site fidelity, and are thought to rarely venture more than 50 feet from the shelter of cover objects (USFWS 2024). Due to their ecology and behaviors, KCSS can be difficult to detect when they are present.

The MND indicates that approximately 63 acres of suitable habitat will be temporarily disturbed and less than four acres will be permanently impacted for KCSS, yellow-blotched salamander (*Ensatina eschscholtzii croceater*), and Tehachapi slender salamander, but the MND does not disclose how much KCSS-specific habitat will be impacted or if take of KCSS is an anticipated impact. Mitigation Measure Biology-7 directs SCE to disclose to CDFW the area of impacts to KCSS habitat and to document the area of proposed habitat restoration and compensatory mitigation to offset Project impacts. The requirements for SCE to protect mitigation areas using a conservation easement held by an entity approved by CDFW and to provide CDFW a letter of credit if mitigation is not competed prior to the start of Project activity appear to suggest that the MND requires SCE to acquire an Incidental Take Permit from CDFW for potential or anticipated take of KCSS. CDFW would not otherwise have authority to approve a form of easement or mitigation funding security. CDFW recommends that the following measures be included in the MND.

A1-7

Recommended Mitigation Measure 7: KCSS Take Authorization
KCSS presence is recently confirmed within the Project area. CDFW recommends consultation with CDFW to discuss Project implementation in suitable habitat and sites known to be occupied by KCSS. For sites where the species is known to occur and any other areas where take avoidance is not feasible, to comply with CESA, CDFW recommends that an ITP be acquired prior to any ground disturbing activities, pursuant Fish and Game Code section 2081, subdivision (b). CDFW recommends that the MND describe whether the CDFW approvals it describes related to mitigation would be associated with an ITP for Project-related incidental take of KCSS based on documented presence or potentially for assumed presence.

Recommended Mitigation Measure 8: KCSS Compensatory Mitigation
If any areas of suitable KCSS habitat will not be included in an ITP authorizing incidental take of KCSS, CDFW recommends that CEQA compensation for loss of KCSS habitat be based on an analysis of specific impacts, such as temporal loss during habitat restoration and habitat fragmentation. The MND describes that mitigation would occur at a rate of at least one to one (lost to restored area). CDFW recommends that the MND disclose for review and comment the basis of how impacts would inform the rate of restoration or mitigation, based on species ecology. A1-8

COMMENT 4: Tehachapi Slender Salamander (TSS)

The MND Master Species List indicates that TSS has a high potential to occur, based on nearby occurrences and potential habitat along Grapevine Creek in Segment 2 of the Project. TSS occur primarily under surface objects such as pieces of wood or talus rocks in moist areas or in leaf litter, and may enter termite tunnels and earthworm burrows. Their home ranges are not well known but considered to be small, and detection through surveys is difficult if individuals are present (CDFW 2024b).

The MND indicates that approximately 63 acres of suitable habitat will be temporarily disturbed and less than four acres will be permanently impacted for KCSS, yellow-blotched salamander, and TSS, but does not state how much TSS specific habitat will be impacted or whether take of TSS is an anticipated impact. Mitigation Measure Biology-7 directs SCE to disclose to CDFW the area of impacts to TSS habitat and to document the area of proposed habitat restoration and compensatory mitigation to offset Project impacts. The requirements for SCE to protect mitigation areas using a conservation easement held by an entity approved by CDFW and to provide CDFW a letter of credit if mitigation is not competed prior to the start of Project activity appear to suggest that the MND requires SCE to acquire an Incidental Take Permit from CDFW for TSS. CDFW would not otherwise have authority to approve a form of easement or mitigation funding security. CDFW recommends that the following measures be included in the MND. A1-9

Recommended Mitigation Measure 9: TSS Habitat Assessment and Survey
CDFW recommends consultation with CDFW when developing surveys and survey locations for TSS and that the biologist(s) conducting surveys have any authorization determined to be needed for TSS via the CDFW Scientific Collecting Permit process.

Recommended Mitigation Measure 10: TSS Take Authorization
If TSS are found, either during surveys or Project activities, consultation with CDFW is warranted to discuss how to implement the Project and avoid take; or if avoidance is not feasible, to potentially acquire an ITP for TSS prior to Project activities, pursuant Fish and Game Code section 2081, subdivision (b). CDFW recommends that the MND describe that the CDFW approvals it describes related to mitigation A1-10

would be associated with an ITP for Project-related incidental take of TSS based on documented presence or potentially for assumed presence.

Recommended Mitigation Measure 11: TSS Compensatory Mitigation
If any areas of suitable TSS habitat will not be included in an ITP authorizing incidental take of TSS, CDFW recommends that CEQA compensation for loss of TSS habitat be based on an analysis of specific impacts, such as temporal loss during habitat restoration or habitat fragmentation. The MND describes that mitigation would occur at a rate of at least one to one (lost to restored area). CDFW recommends that the MND disclose for review and comment the basis of how impacts would inform the rate of restoration or mitigation, based on species ecology. A1-11

COMMENT 5: Western Spadefoot (WESP)

The MND Master Species List indicates that two western spadefoot individuals were observed during field surveys in Segment 4 at the edge of a stockpond located 0.01 mile (approximately 53 feet) from the Project. WESP occurs primarily in grasslands and seasonal wetlands with appropriate upland habitat features, which may be present in additional areas within the Project site. CDFW concurs with the process in Mitigation Measure Biology-5 for surveys, monitoring and avoidance, and recommends that the following measures also be included in the MND. A1-12

Recommended Mitigation Measure 12: WESP Habitat Assessment
CDFW recommends that a qualified biologist conduct a habitat assessment to determine if Project sites and the immediate surrounding vicinity contain habitat suitable to support WESP.

Recommended Mitigation Measure 13: WESP Survey
CDFW recommends that prior to the start of Project activity, a qualified biologist conduct focused surveys in all areas of suitable habitat for western spadefoot. A1-13

Recommended Mitigation Measure 14: WESP Avoidance and Minimization
If burrows, cracks, loose soil areas or other refugia are found to be used by WESP during focused surveys, CDFW recommends avoidance using a 50-foot no-disturbance buffer around these resources. If WESP individuals are observed on the Project site, CDFW recommends that Project activities at the site cease, allowing individuals to leave the Project site of their own volition. Alternately, a qualified biologist with appropriate handling permitting may relocate them to a suitable location out of harm's way. A1-14

COMMENT 6: Blunt-Nosed Leopard Lizard (BNLL)

The MND Master Species List describes BNLL as present within the Project area, based on the presence of suitable habitat within the Project area and recent observations of the species within 0.5 to one mile of the Project. The MND indicates that up to 23 acres of BNLL suitable habitat would be permanently impacted by Project activities.

The MND includes the *SCE Gorman Kern River Project Blunt-nosed Leopard Lizard Minimization and Avoidance Strategy* (BNLL Avoidance Strategy), which is intended to avoid mortality of any blunt-nosed leopard lizard during the Project. CDFW has concerns that activities described in the BNLL Avoidance Strategy include plugging of burrows, use of a one-way door for burrow entrances, burrow excavation, fiber optic-type scoping, and coverboard placement over burrows; these methods all have the potential to result in take of BNLL, including lethal take, if used in areas where BNLL are known to be or are potentially present. The BNLL Avoidance Strategy also does not discuss avoidance of BNLL eggs in burrows. The BNLL Avoidance Strategy may provide minimization but does not clearly describe take avoidance of fully protected BNLL. Additionally, implementation of Mitigation Measure Biology-2 regarding revegetation and restoration activities could result in BNLL take in areas where BNLL are known to be or are potentially present. A1-15

Mitigation Measure Biology-6 directs SCE to disclose to CDFW the area of impacts to BNLL habitat and to document the area of proposed habitat restoration and compensatory mitigation to offset Project impacts. Clarification is needed regarding the requirement that SCE protect mitigation areas using a conservation easement or that any land acquired in fee would be transferred to CDFW, and that SCE must provide a letter of credit to CDFW if Project activity begins prior to completing the compensatory mitigation requirements. Prior consultation between CDFW and SCE and between CDFW and the California Public Utilities Commission has suggested that incidental take of fully protected species cannot be authorized by CDFW in an ITP for the Project activities as currently proposed. CDFW recommends that the MND clearly disclose the nature of the impacts to BNLL that may result from Project implementation, including whether take of individuals is possible or expected, and whether take of BNLL would constitute a significant effect. CDFW recommends that the following measures be incorporated into the MND.

Recommended Mitigation Measure 15: BNLL Surveys
CDFW recommends that a qualified biologist conduct protocol surveys following the *Approved Survey Methodology for the Blunt-nosed Leopard Lizard* (CDFW 2019) prior to Project implementation at sites within the species range where suitable habitat is present.

Recommended Mitigation Measure 16: BNLL Avoidance
Based on the linear footprint of the Project, CDFW recommends that any BNLL detection, known or potentially occupied burrows, or egg clutch sites be avoided and protected using a minimum 50-foot avoidance buffer. Additionally, if BNLL, known or occupied burrows, or egg clutch sites are detected, CDFW recommends that an appropriate number of qualified biologists be present during all Project activities, including ingress and egress to the Project sites, to help ensure that BNLL above ground are detected and not impacted; and that any BNLL individual that enters the Project area be allowed to leave unobstructed of its own volition. A1-16

Recommended Mitigation Measure 17: BNLL Compensatory Mitigation
CDFW recommends that the MND clarify if the BNLL compensatory mitigation requirement is to offset CEQA impacts based on losses to habitat and ecologically important areas, or if mitigation would also be intended to address take of BNLL. CDFW would not have jurisdictional authority to hold easement or accept land in fee as mitigation outside a CDFW regulatory process such as an ITP. The MND describes that mitigation would occur at a rate of at least one to one (lost to restored area). For CEQA compensatory mitigation to offset losses of suitable habitat for BNLL without take of BNLL, CDFW recommends that the MND disclose for review and comment the basis of how impacts would inform the rate of restoration or mitigation; for example, whether temporal loss, habitat fragmentation, creation of barriers, or other impacts would increase the rate of mitigation. A1-17

COMMENT 7: Northwestern Pond Turtle (NWPT)

The MND Master Species List indicates that approximately 200 NWPT occurrences have been noted in the vicinity of Project area along the Kern River and Castaic Lake. Review of aerial imagery shows habitats that NWPT utilize for nesting, overwintering, dispersal, and basking, including streams, ponded areas, irrigation canals, and riparian and upland habitats. NWPT are known to nest in the spring or early summer within 100 meters of a water body, although nest sites as far away as 500 meters have also been reported (Thomson et al. 2016). Noise, vegetation removal, movement of workers, construction, and ground disturbance as a result of Project activities have the potential to significantly impact NWPT populations. Without appropriate avoidance and minimization measures for NWPT, potentially significant impacts associated with Project activities could include nest reduction, inadvertent entrapment, reduced reproductive success, reduction in health or vigor of eggs and/or young, and direct mortality. A1-18

Recommended Mitigation Measure 18: NWPT Surveys
CDFW recommends that a qualified biologist conduct focused surveys for NWPT within 10 days prior to any Project activity, and that focused surveys for nests occur during the egg-laying season of March through August in areas of suitable habitat.

Recommended Mitigation Measure 19: NWPT Avoidance and Minimization
CDFW recommends that any NWPT nests that are discovered remain undisturbed with a no-disturbance buffer maintained around the nest until the eggs have hatched and neonates are no longer in the nest or Project areas. If NWPT individuals are discovered at the site during surveys or Project activities, CDFW recommends that they be allowed to move out of the area of their own volition without disturbance. A1-19

COMMENT 8: Southern Rubber Boa (SRB)

SRB occurrences have been noted in the vicinity of the Project area and portions of the Project area are within the species range (CDFW 2024d). SRB occur at an elevational range is from sea level to 2,740 meters (9,040 feet) and are found in a variety of montane forest habitats including red fir, ponderosa pine, hardwood, hardwood-conifer, Douglas fir, redwood, mixed conifer and riparian (CDFW 2024c). SRB are generally found under logs, boards, and other debris and sometimes on roads at dusk (California Herps 2024). CDFW recommends that the following measures be incorporated into the MND. A1-20

Recommended Mitigation Measure 20: SRB Habitat Assessment and Survey
CDFW recommends consultation with CDFW when developing surveys and survey locations for SRB and that the biologist(s) conducting surveys have any authorization determined to be needed for SRB via the CDFW Scientific Collecting Permit process.

Recommended Mitigation Measure 21: SRB Take Authorization
If SRB are found, either during surveys or Project activities, consultation with CDFW is warranted to discuss how to implement the Project and avoid take; or if avoidance is not feasible, to potentially acquire an ITP prior to any ground disturbing activities, pursuant Fish and Game Code section 2081, subdivision (b). A1-21

COMMENT 9: Other Special-Status Reptile Species

The MND Master Species List indicates that Bakersfield legless lizard, California glossy snake, California legless lizard, coastal whiptail, coast horned lizard, San Joaquin coachwhip, Sierra night lizard, southern California legless lizard, and two-striped garter snake have potential to occur within the Project area and its vicinity. CDFW concurs with implementing Mitigation Measure Biology-5 to minimize potential impacts to these species by implementing pre-construction surveys, avoidance buffers, and monitoring. A1-22

COMMENT 10: Bald Eagle (BAEA)

The Project site is within the known geographic range of BAEA and the MND Master Species List indicates a high potential of occurrence. BAEA require large bodies of A1-23

water with hunting perches of large limbed trees to pounce on fish or small mammals. These habitat features are present within the Project vicinity. CDFW recommends that the following measures be incorporated into the MND.

Recommended Mitigation Measure 22: BAEA Surveys
CDFW recommends that focused BAEA surveys following the *Bald Eagle Breeding Survey Instructions* (CDFW 2010) protocol be conducted by qualified biologists prior to Project implementation.

Recommended Mitigation Measure 23: BAEA Avoidance
If a BAEA is found prior to or during construction, CDFW recommends implementation of a minimum ½-mile no-disturbance buffer. CDFW advises that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon parental care for survival**.** In the event that a BAEA is detected during surveys, and a ½-mile no-disturbance buffer is not feasible, consultation with CDFW is recommended.

A1-24

COMMENT 11: Golden Eagle (GOEA)

The Project site is within the known geographic range of GOEA and the MND documents occurrences of foraging GOEA in the Project vicinity. GOEA are known to inhabit open areas with large trees, utility towers, and cliffs for nesting (USFWS 2010). CDFW recommends that the following measures be incorporated into the MND.

A1-25

Recommended Mitigation Measure 24: GOEA Surveys Prior to Construction
CDFW recommends that surveys following the USFWS (2010) *Protocol for the Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations*, be completed the survey season immediately prior to Project activities in potential nesting habitat.

Recommended Mitigation Measure 25: GOEA Avoidance
If surveys indicate the presence or potential presence of GOEA nesting territories within ½-mile of the Project site, implementation of avoidance measures are warranted. CDFW recommends that a qualified wildlife biologist be on site during all Project activities and that a ½-mile no disturbance buffer be put into effect. If the ½-mile no disturbance buffer cannot feasibly be implemented, consultation with CDFW to assist with providing and implementing additional avoidance measures is suggested.

A1-26

COMMENT 12: Swainson's Hawk (SWHA)

The MND Master Species List notes that a SWHA individual was observed near Tejon Creek. SWHA exhibit high nest-site fidelity year after year in the San Joaquin Valley (CDFW 2016). The MND indicates that over 1,000 large trees would be removed for Project activities, but that the impact is not significant due to the locations of the tree removal. It is not stated whether any of the trees slated for removal are known nesting trees. CDFW concurs generally with Mitigation Measure Biology-11 to minimize potential impacts by implementing pre-construction surveys, avoidance buffers, and monitoring, and also recommends that the following measures be incorporated in the MND. A1-27

Recommended Mitigation Measure 26: SWHA Surveys
CDFW recommends that surveys to detect nesting SWHA be conducted following the entirety of the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000). Please note the survey protocol includes early season surveys to assist the Project proponent in implementing necessary avoidance and minimization measures, and in identifying active nest sites during the nesting season immediately prior to initiating Project activities.

Recommended Mitigation Measure 27: SWHA Avoidance
If Project activities will take place during the SWHA nesting season (i.e., March 1 through September 15), and known SWHA nests are present, CDFW recommends that a minimum ½-mile no-disturbance buffer be delineated and maintained around each nest, regardless of whether it was detected by surveys or observed incidentally. These buffers would remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, to prevent nest abandonment and other take of SWHA as a result of Project activities. A1-28

Recommended Mitigation Measure 28: SWHA Take Authorization
If a ½-mile no-disturbance nest buffer is not feasible, consultation with CDFW is warranted, and an ITP for SWHA may be necessary prior to project implementation to avoid unauthorized take, pursuant to Fish and Game Code section 2081, subdivision (b). A1-29

COMMENT 13: Tricolored Blackbird (TRBL)

The MND Master Species List indicates that eight TRBL were observed in marshes along Grapevine Creek in Segment 2. TRBL breed within the vicinity of fresh water, primarily in marshy areas. Important sites for nesting colonies include cattails, tules, thistles, willows, blackberries, mustard, nettles, and salt cedar (Grinnell and Miller 1944). TRBL are also known to breed in alfalfa, wheat, and other low agricultural crop A1-30

fields (Beedy et al. 2023). Mitigation Measure Biology-8 indicates that TRBL will be included in the Nesting Bird Management Plan; however, CDFW recommends that listed, candidate, or fully protected species be addressed separately, because the survey requirements are based on specific species ecology and can be more rigorous, and avoidance buffers are typically larger. As this species has been observed previously and potential habitat is present, CDFW recommends that the following measures be incorporated into the MND.

Recommended Mitigation Measure 29: TRBL Survey
CDFW recommends that Project activities be timed to avoid the typical bird breeding season (February 1 through September 15); however, if Project activities must take place during the breeding season, CDFW recommends that a qualified biologist conduct focused surveys for nesting TRBL. Because TRBL colonies can expand over time, CDFW recommends conducting pre-construction surveys of an identified nesting colony within 10 days prior to the start of Project activities to reassess the colony's current extent.

Recommended Mitigation Measure 30: TRBL Avoidance
If an active TRBL nesting colony is found during the pre-construction surveys, CDFW recommends implementation of a minimum 300-foot no-disturbance buffer around the colony in accordance with the CDFW (2015) *Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015*. CDFW recommends that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon the colony or parental care for survival.

A1-31

Recommended Mitigation Measure 31: TRBL Take Authorization
If a TRBL nesting colony is detected during surveys, consultation with CDFW is warranted to discuss how to implement the Project and avoid take, or if avoidance is not feasible, to acquire an ITP, pursuant to Fish and Game Code section 2081, subdivision (b), prior to the start of Project activities.

A1-32

COMMENT 14: Western Burrowing Owl (BUOW)

The California Fish and Game Commission approved BUOW as a candidate for potential listing as a protected species under CESA on October 10, 2024, and published findings in the California Regulatory Notice Register (Notice Register) on October 25, 2024. As such, BUOW is now considered a candidate under CESA and receives the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085).

A1-33

The MND Master Species List indicates that BUOW is present within the Project area, with one BUOW and two active burrows observed in Segment 4 southeast of Arvin and east of the California Aqueduct during reconnaissance surveys. Additionally, approximately 462 acres of suitable habitat may be temporarily impacted and 26 acres may be permanently impacted. To reflect BUOW candidate status under CESA, CDFW recommends that Mitigation Measure Biology-9 be updated to include contacting CDFW if BUOW are discovered to discuss adequate avoidance measures, including appropriate buffers, or the potential need for an ITP for Project activities. As noted in the MND, passive relocation to evict individuals from an occupied burrow would require an ITP from CDFW. CDFW also recommends that the following measures be incorporated into the MND.

Recommended Mitigation Measure 32: BUOW Surveys
CDFW recommends that surveys, following the CBOC (1993) *Burrowing Owl Survey Protocol and Mitigation Guidelines* and the CDFW's (CDFG 2012) *Staff Report on Burrowing Owl Mitigation* be conducted within areas of suitable habitat the survey season immediately prior to construction.

Recommended Mitigation Measure 33: BUOW Consultation
For BUOW or known burrows that are currently or previously occupied by BUOW, either during surveys or Project activities, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. or if take avoidance is not feasible, to acquire an ITP prior to any ground disturbing activities, pursuant Fish and Game Code section 2081, subdivision (b). A1-34

Recommended Mitigation Measure 34: BUOW Compensatory Mitigation
The MND requires compensatory mitigation for loss of BUOW habitat. For mitigating the loss of areas that will not be addressed in an ITP authorizing incidental take of BUOW, CDFW recommends that CEQA compensation be based on an analysis of specific impacts, such as temporal loss and habitat fragmentation. The MND describes that mitigation would occur at a rate of at least one to one (lost to restored area). CDFW recommends that the MND disclose for review and comment the basis of how impacts would inform the rate of restoration or mitigation, based on species ecology. A1-35

COMMENT 15: American Badger (AMBA)

The MND Master Species List notes that three active AMBA dens were observed: one in Cottonwood Creek in Segment 1 and two dens in north-facing slopes of the Tehachapi Mountains in Segment 3. CDFW recommends incorporating the following measure into the MND. A1-36

Recommended Mitigation Measure 35: AMBA Surveys and Eviction
CDFW recommends that surveys for AMBA be conducted the day of grading or vegetation clearing, due to the potential for new AMBA burrows to be dug overnight. CDFW also recommends that any plans for eviction of AMBA from a den be reviewed by CDFW prior to implementation.

COMMENT 16: San Joaquin Antelope Squirrel (SJAS)

The Project site is within the known geographic range of SJAS and one historical occurrence was documented in Segment 2. Suitable habitat for SJAS includes areas of grassland, upland scrub, and alkali sink habitats that contain requisite habitat elements, such as small mammal burrows. Based on a review of aerial imagery, portions of the Project site may contain habitat for SJAS. CDFW recommends the following measures:

A1-37

Recommended Mitigation Measure 36: SJAS Habitat Assessment and Surveys
In order to determine if SJAS currently occupy the Project site, CDFW recommends that a qualified biologist conduct a habitat assessment for SJAS within areas of the Project that are within the range of the species. CDFW recommends that a qualified biologist conduct focused daytime visual surveys for SJAS in areas of suitable habitat prior to Project activities commencing in those areas. Conditions considered appropriate for SJAS surveying include daytime temperatures between 68 to 86 degrees Fahrenheit and between April 1 and September 30 (Bradley 1967).

A1-38

Recommended Mitigation Measure 37: SJAS Consultation
CDFW recommends that consultation with CDFW occur to discuss how to implement the Project and avoid take over the life of the Project, specifically within the portions of the Project that are adjacent to habitats with known occurrences of SJAS. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b) is necessary to comply with CESA

COMMENT 17: San Joaquin Kit Fox (SJKF)

The MND Master Species List notes that SJKF is present: a potential active burrow was observed at the base of the western foothills within the Tehachapi Mountains in Segment 2 and an individual was observed in Crane Canyon in Segment 3. The MND indicates that approximately 235 acres of suitable SJKF habitat will be temporarily disturbed and approximately 12 acres of permanent impacts will occur from Project activities.

A1-39

Mitigation Measure Biology-13 describes mitigation for potential impacts to SJKF habitat. The requirements for SCE to protect mitigation areas using a conservation easement held by an entity approved by CDFW and to provide CDFW a letter of credit if

mitigation is not competed prior to the start of Project activity appear to suggest that the MND requires SCE to acquire an Incidental Take Permit from CDFW for SJKF. CDFW recommends that the MND disclose whether take of SJKF is a possible or anticipated as a result of Project activity. CDFW would not otherwise have authority to approve a form of easement or mitigation funding security. CDFW recommends that the following measures be included in the MND.

Recommended Mitigation Measure 38: SJKF Surveys and Avoidance
CDFW recommends that qualified biologists conduct transect surveys of the Project area to detect SJAS individuals and their sign, and that surveys be repeated the survey season immediately prior to the start of Project activity. During Project activity, CDFW recommends that the USFWS (2011) *Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS Standard Recommendations) be implemented.

Recommended Mitigation Measure 39: SJKF Take Authorization
If the no-disturbance buffers outlined in the USFWS Standard Recommendations is not feasible, CDFW recommends that consultation with CDFW occur to discuss how to implement the Project and avoid take. If take cannot be avoided, CDFW recommends the Project proponent pursue take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b) to comply with CESA.

A1-40

Recommended Mitigation Measure 40: SJKF Compensatory Mitigation
If any areas of suitable SJKF habitat will not be included in an ITP authorizing incidental take of SJKF, CDFW recommends that CEQA compensation for loss of SJKF habitat be based on an analysis of specific impacts, such as temporal loss during habitat restoration or habitat fragmentation. The MND describes that mitigation would occur at a rate of at least one to one (lost to restored area). CDFW recommends that the MND disclose for review and comment the basis of how impacts would inform the rate of restoration or mitigation, based on species ecology.

A1-41

COMMENT 18: Tipton Kangaroo Rat (TKR)

The Project site is within the known geographic range of TKR and the MND documents suitable habitat for TKR in Segment 2. Suitable TKR habitat includes areas of grassland, upland scrub, and alkali sink habitats that contain requisite habitat elements, such as small mammal burrows. Based on a review of aerial imagery, portions of the Project site may contain habitat for TKR. CDFW concurs generally with implementing Mitigation Measure Biology-14 to survey and apply avoidance and minimization measures for TKR, and recommends that the following measures be incorporated in the MND.

A1-42

Recommended Mitigation Measure 41: TKR Surveys
CDFW recommends that trapping surveys be conducted following the USFWS (2013) *Survey Protocol for Determining Presence of San Joaquin Kangaroo Rats* during the survey season immediately prior to construction.

Recommended Mitigation Measure 42: TKR Consultation
If TKR are discovered during trapping or Project activities, CDFW recommends that consultation with CDFW occur to discuss how to implement the Project and avoid take, specifically within the portions of the Project that are adjacent to habitats with known occurrences of TKR. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b), would be necessary to comply with CESA. A1-43

COMMENT 19: Special-Status Bat Species

The MND acknowledges that the Project site contains habitat features, such as large trees, crevices in rock outcrops, and railroad trellis, that have the potential to support roosting pallid bat, Townsend's big-eared bat, and western mastiff bat. These species are known to occur in the vicinity of the Project site and historical and recent CNDDB observations for these species have been documented (CDFW 2024d). Project activities have the potential to affect habitat upon which special-status bat species depend on for successful breeding and have the potential to impact individuals and local populations. Mitigation Measure Biology-15 details focused surveys, avoidance buffers, and eviction of individuals from a roost. CDFW concurs with conducting surveys within each area of disturbance and recommends the addition of the following mitigation measure. A1-44

Recommended Mitigation Measure 43: Bat Roost Disturbance Minimization and Avoidance
If bats are present, CDFW recommends that a 100-foot no-disturbance buffer be placed around the roost and that a qualified biologist who is experienced with bats monitor them for signs of disturbance to bats from Project activity. If a bat roost is identified and work is planned to occur during the breeding season, CDFW recommends that no disturbance to maternity roosts occur and that CDFW be consulted to determine measures to prevent breeding disruption or failure.

EDITORIAL COMMENTS

California Natural Diversity Database (CNDDB): Please note that the CNDDB is populated by records through voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record in the CNDDB does not mean a species is not present. In order to adequately A1-45

assess any potential Project related impacts to biological resources, surveys conducted by a qualified biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present at or near the Project site.

Lake and Streambed Alteration: Project activities will impact areas subject to CDFW's regulatory authority pursuant to Fish and Game Code 1600 et seq. The MND Mitigation Measure Biology-16, Mitigation Measure Hydrology-1, and Mitigation Measure Hydrology-2 describe temporary and permanent impacts to 1.72 acres of wetland and 18.71 acres of riparian areas. All Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of vegetation): (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins. A1-46

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration (LSA) Agreement; therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSA Agreement issuance. Any LSA Agreement may include additional measures beyond what is required in the MND, as needed to protect fish, wildlife, and plants, and may include compensatory mitigation. For information on notification requirements, please refer to CDFW's website (https://wildlife.ca.gov/Conservation/LSA) or contact CDFW for the Central Region LSA Program at R4LSA@wildlife.ca.gov or (559) 243-4593, or for the South Coast Region LSA Program at R5LakeandStreambed@wildlife.ca.gov or (858) 636-3160.

Nesting Birds: CDFW encourages that Project activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (January 1 through September 15), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above. A1-47

CDFW agrees with the required contents of the Nesting Bird Management Plan as described in MM Biology-8; however, CDFW recommends that species that are listed or candidate under CESA, fully protected, or listed under the federal Endangered Species Act (ESA) be removed from the Nesting Bird Management Plan due to differing survey

methodologies and recommended buffers to protect nests, based on different species ecologies.

CDFW also agrees with the requirement for a qualified biologist to conduct a pre-construction survey for active nests no more than 10 days prior to the start of ground or vegetation disturbance, to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected, either directly or indirectly, by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist establish a behavioral baseline of all identified nests. Once Project activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is a compelling biological or ecological reason to do so. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Federally Listed Species: CDFW recommends consulting with USFWS regarding potential impacts to federally listed or proposed listed species including but not limited to Bakersfield cactus, California jewelflower, Kern mallow, San Joaquin adobe sunburst, San Joaquin woollythreads, KCSS, WESP, BNLL, NWPT, SJKF, and TKR. ESA is more broadly defined than CESA; take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with ESA is advised well in advance of any Project activities.

A1-48

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, §

A1-49

21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to the CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to the CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

The Project, as proposed, could have an impact on biological resources, an assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). A1-50

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the California Public Utilities Commission in identifying and mitigating Project impacts on biological resources. A Mitigation Monitoring and Reporting Program (Attachment 1) is included below to assist the California Public Utilities Commission with incorporating the recommended mitigation measures provided above. A1-51

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). If you have any questions regarding this letter or further coordination, please contact Benessa Galvan, Senior Environmental Scientist (Specialist), at (559) 580-3197 or by email at Benessa.Galvan@wildlife.ca.gov.

Sincerely,

Signed by:
Hatler, Gerald
37BF80A1646F41C...

For Julie A. Vance
Regional Manager

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Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: Southern California Edison (SCE) Transmission Line Rating Remediation Gorman-Kern River 66kV Project (Project)
Mitigated Negative Declaration (MND)
State Clearinghouse No.: 2024110564

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Project Activity	
Special Status Plants	
Recommended Mitigation Measure 1: Special-Status Plant Surveys	
Recommended Mitigation Measure 2: Special-Status Plant Consultation and Take Authorization	
Recommended Mitigation Measure 3: Salvage and Replanting Plan	
CBB	
Recommended Mitigation Measure 5: CBB Take Authorization	
Recommended Mitigation Measure 6: CBB Habitat Restoration and Compensation	
KCSS	
Recommended Mitigation Measure 7: KCSS Take Authorization	
Recommended Mitigation Measure 8: KCSS Compensatory Mitigation	
TSS	
Recommended Mitigation Measure 9: TSS Habitat Assessment and Survey	
Recommended Mitigation Measure 10: TSS Take Authorization	
Recommended Mitigation Measure 11: TSS Compensatory Mitigation	
WESP	
Recommended Mitigation Measure 12: WESP Habitat Assessment	

Recommended Mitigation Measure 13: Preconstruction Survey for WESP	
BNLL	
Recommended Mitigation Measure 15: BNLL Surveys	
Recommended Mitigation Measure 17: BNLL Compensatory Mitigation	
NWPT	
Recommended Mitigation Measure 18: NWPT Surveys	
SRB	
Recommended Mitigation Measure 20: SRB Habitat Assessment and Survey	
Recommended Mitigation Measure 21: SRB Take Authorization	
BAEA	
Recommended Mitigation Measure 22: BAEA Surveys	
GOEA	
Recommended Mitigation Measure 24: GOEA Surveys Prior to Construction	
SWHA	
Recommended Mitigation Measure 26: SWHA Surveys	
Recommended Mitigation Measure 28: SWHA Take Authorization	
TRBL	
Recommended Mitigation Measure 29: TRBL Survey	
Recommended Mitigation Measure 31: TRBL Take Authorization	
BOUW	
Recommended Mitigation Measure 32: BUOW Surveys	
Recommended Mitigation Measure 33: BUOW Consultation	
Recommended Mitigation Measure 34: BOUW Compensatory Mitigation	
AMBA	
Recommended Mitigation Measure 35: AMBA Surveys and Eviction	
SJAS	
Recommended Mitigation Measure 36: SJAS Habitat Assessment and Surveys	
Recommended Mitigation Measure 37: SJAS Consultation	
SJKF	

Recommended Mitigation Measure 38: SJKF Surveys and Avoidance	
Recommended Mitigation Measure 39: SJKF Take Authorization	
Recommended Mitigation Measure 40: SJKF Compensatory Mitigation	
TKR	
Recommended Mitigation Measure 41: TRK Surveys	
Recommended Mitigation Measure 42: TKR Consultation	
During Project Activity	
CBB	
Recommended Mitigation Measure 4: CBB Avoidance	
WESP	
Recommended Mitigation Measure 14: WESP Avoidance and Minimization	
BNLL	
Recommended Mitigation Measure 16: BNLL Avoidance	
NWPT	
Recommended Mitigation Measure 19: NWPT Avoidance and Minimization	
BAEA	
Recommended Mitigation Measure 23: BAEA Avoidance	
GOEA	
Recommended Mitigation Measure 25: GOEA Avoidance	
SWHA	
Recommended Mitigation Measure 27: SWHA Avoidance	
TRBL	
Recommended Mitigation Measure 30: TRBL Avoidance	
AMBA	
Recommended Mitigation Measure 35: AMBA Surveys and Eviction	
SJKF	
Recommended Mitigation Measure 38: SJKF Surveys and Avoidance	
Special Status Bats	
Recommended Mitigation Measure 44: Bat Roost Disturbance Minimization and Avoidance	
After Project Completion	
CBB	

Recommended Mitigation Measure 6: CBB Compensatory Mitigation	
KCSS	
Recommended Mitigation Measure 8: KCSS Compensatory Mitigation	
TSS	
Recommended Mitigation Measure 11: TSS Compensatory Mitigation	
BNLL	
Recommended Mitigation Measure 17: BNLL Compensatory Mitigation	
BUOW	
Recommended Mitigation Measure 34: BUOW Compensatory Mitigation	
SJKF	
Recommended Mitigation Measure 40: SJKF Compensatory Mitigation	
TKR	
Recommended Mitigation Measure 43: TKR Compensatory Mitigation	

Response to Letter A1 – Heather Vance – California Department of Fish and Wildlife

Response A1-1

The comment suggests that all California Rare Plant Rank 3 and 4 plants should be analyzed in the MND due to their rare status. The comment also recommends adding mitigation measure for special-status plant surveys.

Page 3.4-1 of the IS/MND states, "Plant species considered to be rare, threatened, or endangered in California according to the California Native Plant Society's (CNPS's) California Rare Plant Rank (CRPR), with a CRPR of 1A, 1B, 2A, or 2B as well as certain rank 3 and 4 species with local significance." Two CRPR rank 4 species were identified within the Proposed Project area, and the impacts on those species were evaluated as discussed on page 3.4-44 of the Draft EIR. The Draft IS/MND states on page 3.4-44, "Impacts on CRPR rank 4 plants could be significant if the populations are at the periphery of the species' range, are located in areas where the taxon is especially uncommon or has sustained heavy losses, or are exhibiting unusual morphology or occurring on unusual substrates."

Mitigation Measure (MM) Biology-1 includes requirements for pre-construction botanical surveys, which are appropriate to mitigate the Proposed Project potential for effects. No changes are required in the IS/MND to address the comment.

Response A1-2

The comment recommends a mitigation measure requiring special-status plant consultation with CDFW and take authorization if take of State endangered or threatened plants cannot be avoided in compliance with CESA and the Native Plant Protection Act.

CDFW authority under CESA and the California Native Plant Protection Act are described on page 3.4-30 of the Draft IS/MND. The mitigation measures in the IS/MND are not proposed to replace any requirements for the applicant to obtain permits or approvals from CDFW in compliance with CESA and the California Native Plant Protection Act. It is recognized that the applicant will need to comply with the law. No changes are required in the IS/MND to address this comment.

Response A1-3

The comment requests edits to the requirements in MM Biology-1 for the salvage and replanting plan. The comment specifically requests maintenance and monitoring occur for a period of 5 to 10 years and requests clarification on whether less than 100 percent success of relocated plantings is considered sufficient to keep impacts to less-than-significant levels. The comment also requests incorporating compensatory mitigation into the salvage and replanting plan.

MM Biology-1 in the Draft IS/MND specifies the following as a performance standard "The transplanted/created population(s) shall have approximately the same characteristics as the impacted population (within 10-percent density, total population number, and non-native/invasive). Replanting procedures and monitoring are implemented for 3 years or until the success criteria are met, or a financial contribution is made to an organization that restores/protects special-status populations in the project region." If the performance standard were not met after 3 years, the applicant would either need to continue monitoring and maintenance for a longer duration or would need to provide compensatory habitat mitigation per the requirements in the measure.

The measure also requires, "At a minimum, the transplanted/created population(s) shall have approximately the same characteristics as the impacted population (within 10-percent density, total population number, and non-native/invasive). Seasonal population changes may be taken into account by identifying and documenting the characteristics of an appropriate representative reference site prior to impacting a population." The 10-percent differential allowed for in the measure would not result in a significant impact as the mitigation population would be substantially the same as the impacted population.

The mitigation measure also includes the requirements for compensatory mitigation for impacts on rare plants if replanting is not successful or is unlikely to be successful. Through implementation of the salvage and replanting and compensatory mitigation, the impacts on rare plants would be reduced to less than significant, as described in the IS/MND. No changes are required in the IS/MND to address the comment.

Response A1-4

The comment provides additional recommended mitigation for Crotch's bumble bee avoidance. The comment recommends avoidance of suitable habitat by a minimum of 50 feet during the active period of April 1 to August 31 and consultation with CDFW for activities outside of the active period.

MM Biology-4 allows for the qualified biologist to establish a no-disturbance buffer in consultation with CDFW. The mitigation measure also states, "SCE may relocate Crotch's bumble bees out of the work area only if a CESA incidental take permit has been obtained and any relocation follows the terms of the incidental take permit." The applicant has informed CPUC about its intention to obtain an incidental take permit (ITP) for Crotch's bumble bee. As a result, avoidance of habitat is not proposed in the mitigation measure. No changes are required in the IS/MND to address the comment.

Response A1-5

The comment states that if take of Crotch's bumble bee cannot be avoided, an ITP is recommended for CESA compliance.

See response to A1-4.

Response A1-6

The comment recommends including Crotch's bumble bee in Mitigation Measure Biology-2. The comment also requests greater clarification on how habitat compensation for impacts to Crotch's bumble bee would be determined.

The analysis on page 3.4-45 of the IS/MND is revised as shown to include reference to MM Biology-2, Habitat Restoration to reduce impacts on Crotch's bumble bee:

Crotch's bumblebee: Crotch's bumble bee foraging and nesting habitat is present throughout the majority of the Proposed Project area, and individuals have been observed in habitat similar to that found in the to the Proposed Project area in Kern County. Crotch's bumblebee nest underground in burrows and can establish a new nest each year. If a nest of Crotch's bumble bee were to occur in the Proposed Project area at the time of construction, the impact from destruction of a nest would be significant. In addition, the impact on suitable habitat for Crotch's bumble bee would be significant. MM Biology-2 would be implemented and requires SCE to prepare and implement a

Revegetation, Restoration, and Monitoring Plan, including specific procedures and performance standards to ensure temporarily disturbed habitats are adequately restored following construction. MM Biology-4 requires focused surveys for Crotch's bumble bee a season prior to construction, pre-construction surveys immediately prior to construction, monitoring of nest avoidance for any Crotch's bumblebee in proximity to a work area, and compensatory mitigation for impacts on Crotch's bumblebee habitat. With implementation of Mitigation Measure Biology-2 and Mitigation Measure Biology-4, the impact on Crotch's bumble bee would be less than significant with mitigation.

The applicant would need to submit a compensatory mitigation proposal to the CPUC in compliance with the mitigation requirements. See also response to comment A1-4 regarding the applicant's intent to obtain an ITP for Crotch's bumble bee. The CPUC recognizes that CDFW will likely have additional requirements for habitat mitigation.

Response A1-7

The comment provides recommendations for the applicant to acquire an ITP prior to ground-disturbing activities. The comment also recommends that the MND describe whether CDFW approval in the mitigation would be associated with an ITP.

CDFW's recommendation for the applicant to consult with CDFW and obtain an ITP for sites where the species is known to occur is noted.

MM Biology-7 does not explicitly state that CDFW will grant approval as the CPUC holds authority for implementation of the mitigation measures in the IS/MND. The measure also does not specifically require the approval be granted in association with an ITP. However, if the applicant were to obtain an ITP, CPUC would coordinate with the applicant and CDFW regarding fulfillment of any compensatory mitigation under the ITP to address the requirements of MM Biology-7. No changes are required in the IS/MND to address the comment.

Response A1-8

The comment recommends that CEQA compensation for loss of Kern Canyon slender salamander habitat be based on an analysis of specific impacts such as temporal loss during habitat restoration and fragmentation.

The analysis of impacts on Kern Canyon slender salamander habitat is included in the Draft IS/MND on pages 3.4-45 and 3.4-46. As discussed on page 3.4-46 of the Draft IS/MND, MM Biology-2 would apply to temporal loss of Kern Canyon slender salamander habitat and "requires that certain performance standards and timeframes be met during restoration that would ensure the restoration of temporal impact areas is comparable to pre-project conditions." The text on page 3.4-46 of the Draft IS/MND referencing the mitigation measure for Kern Canyon slender salamander is corrected as follows:

MM Biology-~~6~~7 requires compensatory mitigation for permanent impacts to habitat for Tehachapi slender salamander and Kern Canyon slender salamander.

The Proposed Project involves installation of a power line adjacent to the existing power line and removal of the existing power line. The Proposed Project would not cause habitat fragmentation as the Proposed Project will replace existing impacts.

As described in the requirements for MM Biology-7, "A compensatory mitigation plan using the minimum compensatory ratios and mitigation pathways described in this measure shall be drafted and approved by appropriate agency prior to activities within TSS and KCSS suitable habitat."

The measure includes CPUC's intention to coordinate with CDFW and USFWS on the compensatory mitigation proposal. The minimum mitigation ratio of 1:1 for permanent impacts is specified in the measure to provide a minimum level for habitat replacement to avoid significant impacts.

Response A1-9

The comment recommends consultation with CDFW when developing surveys for Tehachapi slender salamander.

The request for consultation with CDFW is noted. APM BIO-HERP-5 includes focused surveys for Tehachapi slender salamander by a qualified biologist within habitat for the species. It also requires obtaining any necessary permits from CDFW if relocation of Tehachapi slender salamander is required. The measure also requires coordination with CDFW prior to any construction within the limited operating period for Tehachapi slender salamander. No changes are required in the IS/MND to address the comment.

Response A1-10

The comment recommends that the applicant acquire an ITP if avoidance of Tehachapi slender salamander is not feasible. The comment also recommends that the mitigation measure in the MND describe whether the CDFW approval would be related with an ITP.

The comment regarding acquisition of an ITP if avoidance of Tehachapi slender salamander is not feasible is noted.

MM Biology-7 does not explicitly state that CDFW will grant approval as the CPUC holds authority for implementation of the mitigation measures in the IS/MND. The measure also does not specifically require the approval be granted in association with an ITP. However, if the applicant were to obtain an ITP, CPUC would coordinate with the applicant and CDFW regarding fulfillment of any compensatory mitigation under the ITP to address the requirements of MM Biology-7. No changes are required in the IS/MND to address the comment.

Response A1-11

The comment recommends that CEQA compensation for loss of Tehachapi slender salamander habitat be based on an analysis of specific impacts such as temporal loss during habitat restoration and fragmentation.

The analysis of impacts on Tehachapi slender salamander habitat is included in the Draft IS/MND on pages 3.4-45 and 3.4-46. As discussed on page 3.4-46 of the Draft IS/MND, MM Biology-2 would apply to temporal loss of Tehachapi slender salamander habitat and "requires that certain performance standards and timeframes be met during restoration that would ensure the restoration of temporal impact areas is comparable to pre-project conditions." The text on page 3.4-46 of the Draft IS/MND referencing the mitigation measure for Tehachapi slender salamander is corrected as follows:

MM Biology-~~6~~7 requires compensatory mitigation for permanent impacts to habitat for Tehachapi slender salamander and Kern Canyon slender salamander.

The Proposed Project involves installation of a power line adjacent to the existing power line and removal of the existing power line. The Proposed Project would not cause habitat fragmentation as the Proposed Project would replace existing impacts.

As described in the requirements for MM Biology-7, "A compensatory mitigation plan using the minimum compensatory ratios and mitigation pathways described in this measure shall be drafted and approved by appropriate agency prior to activities within TSS and KCSS suitable habitat."

The measure includes CPUC's intention to coordinate with CDFW and USFWS on the compensatory mitigation proposal. The minimum mitigation ratio of 1:1 for permanent impacts is specified in the measure to provide a minimum level for habitat replacement to avoid significant impacts.

Response A1-12

The comment recommends that a qualified biologist conduct a habitat assessment to determine if the Project site and vicinity contain habitat suitable for western spadefoot.

A jurisdictional delineation was completed for the Proposed Project as provided in Appendix D.4 Jurisdictional Delineation Report. The Proposed Project work areas do not include any ponds or areas that would be potentially suitable breeding habitat for western spadefoot. The impacts on suitable habitat discussed for western spadefoot discussed in the Draft IS/MND on page 3.4-46 are solely to dispersal habitat areas within 1.2 miles of breeding ponds. MM Biology-2 is applied to temporary impacts on habitat. The Proposed Project involves replacement and removal of existing subtransmission poles with new subtransmission poles adjacent to the existing poles. The replacement poles would not create a barrier to western spadefoot. No changes are required in the IS/MND to address the comment.

Response A1-13

The comment recommends focused surveys for western spadefoot in areas of suitable habitat prior to Project activities.

As discussed in response to comment A1-12, the Proposed Project does not include activities within potentially suitable breeding habitat for western spadefoot. Focused surveys for western spadefoot are required in the winter/early spring and would not provide information on whether or not western spadefoot could be dispersing into the Proposed Project area at the time of construction. As described in the Draft IS/MND on page 3.4-46, "MM Biology-5 requires pre-construction surveys be performed by a qualified biologist no more than 7 days prior to construction in each work area and

requires qualified biological monitors to be present at all times during construction in areas where western spadefoot has been located and in areas of suitable habitat and allows the biologist to halt construction activities to ensure construction activities do not harm individuals. With implementation of MM Biology-5, direct impacts on western spadefoot would be less than significant with mitigation." No changes are required in the IS/MND to address the comment.

Response A1-14

The comment recommends that if any habitat is found to be used by western spadefoot during surveys, a 50-foot avoidance no-disturbance buffer be applied and that either the western spadefoot be allowed to leave the Project site of their own volition or that a biologist with appropriate handling permitting relocate the individual out of harm's way.

See response to comment A1-12 regarding absence of western spadefoot

Response A1-15

The comment recommends that a qualified biologist conduct protocol surveys within suitable habitat for blunt-nosed leopard lizard prior to Project implementation.

The comment is noted. The applicant has proposed surveys for blunt-nosed leopard lizard in suitable habitat following agency-approved protocols. Refer to page 2 of the SCE Gorman Kern River Project Blunt-nosed Leopard Lizard Minimization and Avoidance Strategy in Appendix D.6 of the Draft IS/MND for details regarding protocol surveys prior to Project implementation. The strategy in Appendix D.6 is considered part of the project as described in the Draft IS/MND. No changes are required in the IS/MND to address the comment.

Response A1-16

The comment recommends avoidance of any potentially occupied burrows with a 50-foot buffer and monitoring by qualified biologists in proximity to any occupied burrows. The comment also recommends avoidance of any blunt-nosed leopard lizard.

The CPUC recognizes that blunt-nosed leopard lizard is a California fully protected species. The Blunt-nosed Leopard Lizard Minimization and Avoidance Strategy in Appendix D.6 of the Draft IS/MND includes details for pre-construction monitoring

within 15 meters (50 feet) of Project work areas and monitoring during construction. No changes are required in the IS/MND to address the comment.

Response A1-17

The comment requests clarification on whether the compensatory mitigation requirement is to offset CEQA impacts or if mitigation is intended to address take of blunt-nosed leopard lizard and how the rate of mitigation would be determined.

The compensatory mitigation in the Draft IS/MND is intended to address CEQA impacts only. See also response to comment A1-16. The Proposed Project involves removing and replacing a power line with a new parallel power line. The infrastructure installed by the Proposed Project would replace existing infrastructure and would not create any new barriers for the species or increase habitat fragmentation. The applicant is seeking a "take" permit for blunt-nosed leopard lizard from USFWS, and the exact mitigation ratio could be affected by the USFWS permit. The CPUC recognizes that the federal ESA definition of "take" differs from the CESA definition of "take." No changes are required in the IS/MND to address the comment.

Response A1-18

The comment recommends a qualified biologist conduct focused surveys for northwestern pond turtle and that focused surveys for nests occur during the egg-laying season in suitable habitat.

The only areas where the Proposed Project involves work in proximity to suitable habitat for northwestern pond turtle is at work areas along the Kern River where work would be conducted within the existing substation footprint and disturbed areas (e.g., parking lot and disturbed road pull outs) adjacent to the substation and Kern Canyon Road. Due to avoidance of work within suitable habitat for northwestern pond turtle, the Proposed Project would avoid impacts on northwestern pond turtle. No changes are required in the IS/MND to address the comment.

Response A1-19

The comment recommends a no-disturbance buffer around any discovered nests until eggs have hatched and neonates are no longer in the nest and that northwestern pond turtle are able to leave the site without disturbance.

See response to comment A1-18 regarding avoidance of suitable habitat. No changes are required in the IS/MND to address the comment.

Response A1-20

The comment notes that southern rubber boa have been documented in the vicinity of the Project area and states that the range for southern rubber boa is from sea level to 9,020 feet. The comment recommends consultation with CDFW to develop surveys for southern rubber boa and that biologists obtain any necessary authorization via the CDFW Scientific Collecting Permit process.

The comment misstates the elevation range for southern rubber boa. The northern rubber boa (*Charina bottae*) is found from sea level to ~9,200 feet; however, the southern rubber boa (*Charina umbratica*) is found closer to 5,000 feet to 8,000 feet. As discussed in Appendix D.1, the highest elevation in the Proposed Project site is 4,531 feet.

SCE conducted a focused habitat evaluation for southern rubber boa in the Proposed Project area in February 2025 (see new Appendix D-13 below). The Proposed Project work areas above 4,000 feet lack key microhabitat features necessary for southern rubber boa. While the species is known to inhabit higher-elevation forested woodlands in the Tehachapi and San Emigdio Mountains, the Project area lacks the necessary moisture retention, soil composition, and cover elements essential for its survival. Additionally, the hot climate at these lower elevations further reduces habitat suitability by limiting moisture availability, which is a critical factor for the species' thermoregulation and burrowing behavior. As the habitat conditions in the Proposed Project area does not contain microhabitat features required for southern rubber boa, the Proposed Project would have a less-than-significant impact on the species. Although current data suggests that the project area does not provide optimal conditions for the southern rubber boa and the impacts would be less than significant, Mitigation Measure Biology-5: Pre-Construction Surveys for Special-Status Wildlife and Construction Monitoring and Avoidance Procedure, requires SCE to have a biological monitor on site while all construction activities take place. The Appendices are updated to include Appendix D-13.

Response A1-21

The comment recommends consultation with CDFW if southern rubber boa are found and, in the event avoidance is not feasible, that an ITP be required prior to any ground disturbing activities.

The comment is noted. See response to comment A1-20 regarding the lack of suitable habitat for southern rubber boa. No changes are required in the IS/MND to address the comment.

Response A1-22

The comment concurs with the implementation of Mitigation Measure Biology-5 to minimize potential impacts on Bakersfield legless lizard, California glossy snake, California legless lizard, coastal whiptail, coast horned lizard, San Joaquin coachwhip, Sierra night lizard, southern California legless lizard, and two-striped garter snake.

The comment is noted. No changes are required in the IS/MND to address the comment.

Response A1-23

The comment notes that bald eagle are listed as having a high potential to occur in the Proposed Project area in the Draft IS/MND and recommends that bald eagle surveys be conducted following the protocol specified in the CDFG's "Bald Eagle Breeding Survey Instructions" prior to Project implementation.

The analysis of impacts on eagles is updated on page 3.4-50 and 3.4-51 as follows:

Bald eagle and golden eagle: Bald eagles have a high potential to occur in the Proposed Project area due to the presence of suitable habitat; no bald eagle nests have been observed in the Proposed Project area. Golden eagles have been observed foraging and nesting within the Proposed Project area. Golden eagles are particularly sensitive to noise and other anthropogenic disturbances and are prone to abandonment of nest sites, especially in newly established territories. Typical construction activities (e.g., most ground-based equipment) could impact nesting behavior of bald eagle and golden eagle for up to approximately 0.5 mile. High-disturbance construction activities such as helicopter operations could impact nesting behavior of bald eagle and golden eagle for up to 1 mile from the location of the activity. Mitigation Measure Biology-10 requires

bald eagle and golden eagle nest surveys when construction activities are scheduled to occur in or near bald eagle or golden eagle nesting habitat from January 1 to August 31 to determine if any eagle nests are active within a 1-mile radius. If nesting eagles are observed, a buffer of 1 mile would be established around the nest if in line of sight of construction activity and 0.5 mile if not in line of sight, to be determined with USFWS concurrence. Because Mitigation Measure Biology-10 includes procedures to avoid disturbance of a bald and golden eagle nest, including avoidance buffers, the impact on bald and golden eagles from construction activities and associated disturbances would be less than significant.

Construction would also result in direct permanent and temporary loss of suitable foraging habitat for bald and golden eagles. While bald and golden eagles can nest in the existing transmission structures and trees along the alignment, the loss of habitat from removal of transmission structures and removal of trees from the wooded areas of the alignment would not significantly impact the species because there is surrounding natural nesting habitat that would not be affected by the Proposed Project. Temporary impacts on foraging habitat would not substantially impact this species because the impacts would be limited and dispersed along the Proposed Project alignment and unaffected foraging habitat surrounds the Proposed Project, which would remain available to golden eagles. Permanent impacts from the new subtransmission poles in suitable foraging habitat for bald and golden eagles would be offset by the removal of the existing subtransmission poles and towers/structures along the existing alignment. Impacts from habitat loss would, therefore, be less than significant.

Mitigation Measure Biology 10 on page MND-16, 3.4-69 and Table 4.1-1 on page 4-43 is revised as follows:

Mitigation Measure Biology 10: Bald Eagle and Golden Eagle Avoidance and Minimization

Avoid and minimize impacts. All project activities located within areas identified as bald eagle or golden eagle habitat (as described in the TLRR Habitat and Sensitive Species Report for the GKR Project) shall implement the following avoidance and minimization measures.

- Bald eagle and golden eagle nest surveys will be performed when construction activities are scheduled to occur in or near bald eagle or golden eagle nesting habitat from January 1-August 31 to determine if any eagle

nests are active within a 1-mile radius. Ground-based or helicopter-based survey methods will be developed in coordination with USFWS and will be consistent with current USFWS and CDFW survey guidelines, or as recommended by USFWS and CDFW. Surveys shall be conducted one season prior to Project implementation following CDFW Bald Eagle Survey Instructions Protocol and USFWS Protocol for the Interim Golden Eagle Inventory and Monitoring Protocol.

- For construction activity, should an active bald eagle or golden eagle nests be present, the nest shall receive a 1-mile buffer if in line of sight, 0.5-mile buffer if no line of sight—with USFWS concurrence.
- Buffers and buffer modifications for bald and golden eagles will be addressed in the Project Nesting Bird Management Plan (Mitigation Measure Biology-8).

Applicable locations: Activities within 1 mile of a bald eagle or golden eagle nest.

Performance standards and timing:

Before construction: N/A Conduct surveys for bald eagle and golden eagle following USFWS and CDFW protocols the survey season immediately prior to Project activities.

During construction: SCE conducts a nesting survey for all activities within 1 mile of suitable habitat for bald eagle and golden eagle in the period January 1 to August 31. Nest buffers shall be implemented per the measure and USFWS requirements.

After construction: N/A.

Response A1-24

The comment recommends a 0.5-mile no disturbance buffer during the breeding season if bald eagles are detected during surveys.

See revisions to MM Biology 10 provided in response to comment A1-23.

Response A1-25

The comment recommends surveys following the USFWS's (2010) Interim Golden Eagle Inventory and Monitoring Protocols be completed the season prior to Project activities.

See revisions to MM Biology-10 in response to comment A1-23.

Response A1-26

The comment recommends a 0.5-mile no disturbance buffer and consultation with CDFW if the no disturbance buffer cannot be implemented.

MM Biology-10 requires a 1-mile no-disturbance buffer if there is line of sight and 0.5-mile no-disturbance buffer if there is no line of sight. MM Biology-8 requires consultation with CDFW and USFWS if buffer reductions are required. No changes to the IS/MND are required.

Response A1-27

CDFW concurs with implementation of MM Biology-11 for reducing impacts on Swainson's hawk and recommends surveys to detect Swainson's hawk following the survey protocol developed by the Swainson's Hawk Technical Advisory Committee (2000).

Mitigation Measure Biology-11 on page MND-16 and 3.4-70 is revised as follows to incorporate the recommended protocol in response to this comment:

Swainson's hawk nest surveys shall be performed by a CPUC-approved qualified biologist following the protocol in Swainson's Hawk Technical Advisory (2000) in areas of suitable habitat prior to construction activities scheduled to occur during the Swainson's hawk nesting season (from March 1-July 31).

Mitigation Measure Biology-11 on Table 4.1-1 on page 4-44 is revised as follows to incorporate the recommended protocol in response to this comment:

Swainson's hawk nest surveys shall be performed by a CPUC-approved qualified biologist following the protocol in Swainson's Hawk Technical Advisory (2000) in areas of suitable habitat prior to construction activities scheduled to occur during the Swainson's hawk nesting season (from March 1~~-September 15~~ July 31).

Response A1-28

The comment recommends a 0.5-mile no-disturbance buffer around any active Swainson's hawk nest during the nesting season.

The comment is consistent with the 0.5-mile no disturbance buffer specified in MM Biology-11. No changes are required in the IS/MND to address the comment.

Response A1-29

The comment recommends that if a 0.5-mile no-disturbance buffer is not feasible, consultation with CDFW is warranted and an ITP for Swainson's hawk may be necessary.

The comment is consistent with the language in MM Biology-11, which states "buffer zones may be adjusted in consultation with CDFW." The potential for an ITP to be required is noted. No changes are required in the IS/MND to address the comment.

Response A1-30

The comment recommends that Project activities be timed to avoid the bird breeding season and pre-construction surveys for tricolored blackbird be performed if Project activities are to occur during the breeding season. In addition, CDFW recommends conducting pre-construction surveys of any identified tricolored blackbird nesting colonies within 10 days prior to Project activities to reassess the colony's current extent.

MM Biology-8 requires that pre-construction surveys be conducted no more than 10 days prior to the start of activity on the site. MM Biology-8 addresses the request for pre-construction surveys within 10 days. No changes are required in the IS/MND to address the comment.

Response A1-31

The comment recommends a 300-foot no-disturbance buffer for tricolored blackbirds.

MM Biology-8 includes a 500-foot no-disturbance buffer for tricolored blackbirds, thereby providing greater protection than requested in the comment. The buffer in MM Biology-8 is protective of the species. No changes are required in the IS/MND to address the comment.

Response A1-32

The comment notes that if a tricolored blackbird nesting colony is detected during surveys, consultation with CDFW is warranted to avoid take or acquire an ITP if avoidance isn't feasible.

CDFW's authority under Fish and Game Code is noted. MM Biology-8 includes avoidance buffers as noted in response to comment A1-31 to avoid take of tricolored blackbird. No changes are required in the IS/MND to address the comment.

Response A1-33

The comment recommends that MM Biology-9 be updated to include contacting CDFW if burrowing owl are discovered to discuss avoidance measures and buffers or potential for an ITP. CDFW recommends that surveys following Burrowing Owl Survey Protocol and Mitigation Guidelines and Staff Report on Burrowing Owl Mitigation be conducted within suitable habitat the survey season immediately prior to construction.

MM Biology-9 includes conducting surveys in accordance with CDFW guidelines and notes that if burrowing owls must be relocated following the conditions of the mitigation measure and the conditions of "any required CESA incidental take permit." MM Biology-9 is consistent with the comment. No changes are required in the IS/MND to address the comment.

Response A1-34

The comment recommends that, for burrowing owl burrows that are currently or previously occupied, consultation with CDFW is warranted to discuss how to implement the project and avoid take or acquire an ITP.

The comment is noted. MM Biology-9 addresses this comment, as described in response to comment A1-33. No changes are required in the IS/MND to address the comment.

Response A1-35

The comment recommends that CEQA compensation for loss of burrowing owl habitat be based on an analysis of specific impacts, such as temporal loss and habitat fragmentation and how impacts would inform the rate of restoration or mitigation based on species impacts.

As discussed on page 3.4-50 of the Draft IS/MND, MM Biology-2 would address temporary impacts on burrowing owl habitat. In addition, "Permanent impact areas at new structure/pole locations in suitable habitat would be offset by the removal of the existing subtransmission poles/structures from suitable habitat areas." As the Proposed Project would replace an existing subtransmission line adjacent to the existing line, the

Proposed Project would not cause habitat fragmentation. Because temporary habitat impacts would be restored, the 1:1 mitigation ratio is defined under CEQA to offset any permanent habitat loss and is appropriate based on the nature of the Proposed Project impacts. It is noted that the applicant would also need to comply with any mitigation required in an ITP if one is obtained. No changes are required in the IS/MND to address the comment.

Response A1-36

The comment recommends that surveys for American badger be conducted the day of grading and vegetation clearing due to the potential for new American badger burrows to be dug overnight and any plans for eviction of American badger be reviewed by CDFW.

MM Biology-12 on page MND-17, 3.4-70 and Table 4.1-1 on page 4-45 is revised in response to this comment as follows:

A qualified biologist shall conduct a pre-construction survey for active American badger dens within ~~7~~ one days prior to grading or vegetation clearing in work areas, or use of overland access routes.

and

SCE shall obtain any required permits and/or consult with CDFW prior to implementing any den exclusions.

Response A1-37

The comment notes that there is a historical occurrence of San Joaquin antelope squirrel in Segment 2 and recommends that a qualified biologist conduct a habitat assessment for San Joaquin antelope squirrel within the range of the species and conduct focused daytime visual surveys prior to Project activities.

As discussed on page 5-33 of Appendix D.1 of the Draft IS/MND:

"Surveys for special-status wildlife species within the GKR alignment were conducted between May 15 and May 19, 2017, between April 29 and May 2, 2018, and between April 15 and April 19, 2019. The Nelson's antelope ground squirrel was not observed during the special-status wildlife surveys. Two 1903 CNDDB records (Occurrence # 74

and #258) were reported 0.24 miles (0.39 kilometers) northwest of the alignment at Rose Station along the California aqueduct about 1.5 miles (2.4 kilometers) southeast of the intersection between Interstate 5 and the California aqueduct, just north of Grapevine. A 1911 record (Occurrence #257) was generally reported approximately 5 miles (8 kilometers) west of the GKR alignment and was mapped about 8 miles (12.9 kilometers) northeast of Bakersfield in the vicinity of the Kern River in Hart Memorial Park (CNDDB 2019). All other CNDDB records occur more than 5 miles (8 kilometers) west and north of the GKR alignment.

The Nelson's antelope ground squirrel currently occurs primarily in marginal habitats of low foothills and mountains on the western edge of the San Joaquin Valley outside of the Project area; significant populations occur only in western Kern County at Elk Hills and on portions of the Carrizo and Elkhorn plains. Potentially suitable habitat along the Project alignment occurs in uncultivated grasslands and low shrublands between the California aqueduct east of Wheeler Ridge south to Grapevine at 'Rose Station', where two 1903 CNDDB records were reported over 100 years ago (Figure 9); these observations are 'presumed extant' by CNDDB (2019). However, there are no current records for the Nelson's antelope ground squirrel that overlap or occur within 5 miles (8 kilometers) of the GKR alignment. The Nelson's antelope ground squirrel is unlikely to occur within the GKR alignment in uncultivated grasslands and low shrublands between the California aqueduct east of Wheeler Ridge south to Grapevine and does not occur elsewhere, based on habitat fragmentation and the lack of current records for this species within 3 miles (4.8 kilometers) of the alignment."

The range of San Joaquin antelope squirrel has been restricted from its historic range, which included the occurrences from over 100 years ago. The range of San Joaquin antelope squirrel has been fragmented due to development in the area, including major highways and roadways since the early 1900s. In addition, the species has not been encountered in multiple rounds of surveys throughout the area, including surveys conducted during optimal timing for location of the species. Thus, the Proposed Project is very unlikely to impact San Joaquin antelope squirrel, and the impact is thus less than significant. While the impact is less than significant, it is noted that Mitigation Measure Biology-5 requires pre-construction surveys in all work areas, which would provide protection for any special-status species encountered, including San Joaquin antelope squirrel.

Response A1-38

The comment recommends consultation with CDFW to discuss how to implement the Project and avoid take of San Joaquin antelope squirrel for work within areas adjacent to known habitat.

The comment is noted. See response to comment A1-37. No changes are required in the IS/MND to address the comment.

Response A1-39

The comment recommends transect surveys following the USFWS's Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance.

As discussed on page 3.4-52, SCE has proposed APM-MAM-2 for protection of San Joaquin kit fox. APM-MAM-2. APM-MAM-2 requires "pre-construction surveys for San Joaquin kit fox 30 days prior to initial ground disturbing activities" and specifies that "USFWS and CDFW will be consulted prior to conducting work as required by the permits." The applicant has indicated its intention to obtain an ITP for San Joaquin kit fox and will implement any requirements of the ITP including any specific survey requirements. No changes are required in the IS/MND to address the comment.

Response A1-40

The comment recommends consultation with CDFW if no-disturbance buffers outlined in the USFWS Standard Recommendations are not feasible.

APM MAM-2 includes no disturbance buffers consistent with 2011 USFWS Standardized Recommendations for Protection of the San Joaquin Kit Fox. See response to comment A1-39 regarding the applicant's intention to obtain an ITP for San Joaquin kit fox. No changes are required in the IS/MND to address the comment.

Response A1-41

The comment recommends CEQA mitigation for loss of San Joaquin kit fox habitat be based on an analysis of impacts including temporal loss during habitat restoration or habitat fragmentation.

As discussed on page 3.4-52 of the Draft IS/MND, MM Biology-2 would address temporary impacts on San Joaquin kit fox habitat. The Proposed Project would replace an existing subtransmission line adjacent to the existing line and would not cause habitat fragmentation. Because temporary habitat impacts would be restored, the 1:1 mitigation ratio is defined under CEQA to offset any permanent habitat loss and is appropriate based on the nature of the Proposed Project impacts. It is noted that the applicant would also need to comply with any mitigation required in an ITP if one is obtained. No changes are required in the IS/MND to address the comment.

Response A1-42

The comment recommends trapping surveys be conducted following USFWS's "Survey Protocol for Determining Presence of San Joaquin Kangaroo Rats during the survey season immediately prior to construction.

MM Biology-14 specifies that "SCE shall conduct focused protocol trapping surveys according to accepted protocols to determine presence or absence of TKR." The focused trapping protocol would be consistent with CDFW recommendation to follow the USFWS survey protocol. No changes are required in the IS/MND to address the comment.

Response A1-43

The comment recommends that if Tipton's kangaroo rats are encountered during surveys, consultation with CDFW be conducted to avoid take or an ITP be obtained from CDFW.

The requirements for avoidance of Tipton's kangaroo rat are noted in MM Biology-14, and MM Biology-14 specifies that "other avoidance measures may be required, subject to authorization by USFWS and CDFW." The requirement to potentially obtain an ITP is noted. No changes are required in the IS/MND to address the comment.

Response A1-44

The comment recommends a 100-foot no-disturbance buffer around any bat roost and monitoring by a qualified biologist. The comment also recommends consultation with CDFW if work is to occur during the breeding season and a bat roost is identified.

MM Biology-15 on page MND-19, 3.4-73 and Table 4.1-1 on page 4-49 is revised in response to this comment as follows:

Construction Monitoring. If a colonial or solitary maternity roost was located, tree/structure removal will be avoided between April 15 and August 15 (the maternity period) to avoid impacts to active maternity roosts (reproductively active females and dependent young). If bats are present, but no dependent young bats are present within the structure for removal, an eviction plan shall be prepared by a qualified biologist and submitted to CPUC and CDFW for review. A ~~qualified biologist will determine the appropriate~~ 100-foot no disturbance buffer ~~area~~ around active roost ~~nest(s)~~ and monitoring of the no-disturbance buffer by a qualified biologist will be provided ~~provisions for buffer exclusion areas~~. Unless restricted by the qualified biologist, construction vehicles will be allowed to move through a buffer area with no stopping or idling. The qualified biologist will determine, evaluate, and modify buffers as appropriate based on species tolerance and behavior in consultation with CDFW, the potential disruptiveness of construction activities, and existing conditions. Furthermore, the roost will be monitored to determine activity. Roost monitoring will be conducted by qualified biological monitors with knowledge of bat behavior under the direction of a CDFW qualified bat biologist. The qualified biological monitor will observe and document implementation of appropriate buffer areas around active roost(s) during project activities.

Response A1-45

The comment states that lack of occurrence records in the CNDDB does not mean a species is not present and surveys conducted by a qualified biologist during the appropriate survey period using the appropriate protocol are required to determine species presence or absence.

The comment is noted and is consistent with the approach to analysis in the Draft IS/MND. No changes are required in the IS/MND to address the comment.

Response A1-46

The comment states that activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW regulatory authority.

The comment is noted and is consistent with the regulatory setting in the Draft IS/MND. No changes are required in the IS/MND to address the comment.

Response A1-47

The comment states that if activities occur during the nesting season the Project applicant is responsible for complying with the Migratory Bird Treaty Act and Fish and Game Code. The comment also agrees with the contents of MM Biology-8, but requests that CESA fully protected or listed species be removed from the Nesting Bird Management Plan.

Additional mitigation for CESA species is provided for in separate mitigation measures, where appropriate. See responses to comments A1-26, A1-28, A1-31, and A1-33. No changes are required in the IS/MND to address the comment.

Response A1-48

The comment recommends consulting with USFWS regarding potential impacts to federally listed species.

The comment is noted. No changes are required in the IS/MND to address the comment.

Response A1-49

The comment states the requirement to report any special-status species and natural community detections to CNDDB.

The comment is noted. No changes are required in the IS/MND to address the comment.

Response A1-50

The comment notes that filing fees are payable upon filing of the Notice of Determination.

The comment is noted. No changes are required in the IS/MND to address the comment.

Response A1-51

The comment notes that a Mitigation Monitoring and Reporting Plan is provided as an attachment to the comment letter.

The IS/MND Mitigation Monitoring and Reporting Plan (MMRP) was attached to the Draft IS/MND. The revised MMPR is included with the Final IS/MND and incorporates the revisions included in this response to comments document.

Gmail

Jessica Koteen <jessica.koteen@panoramaenv.com>

Gorman Kern River Transmission Line Rating and Remediation Project [CA-CPUC-2023-3]

1 message

Eunice Ambriz <Eunice.Ambriz@sanmanuel-nsn.gov> Mon, Dec 16, 2024 at 10:59 AM
To: "eric.chiang@cpuc.ca.gov" <eric.chiang@cpuc.ca.gov>
Cc: "kernrivertlrr@panoramaenv.com" <kernrivertlrr@panoramaenv.com>

Dear Eric Chiang,

Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) regarding the above-referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by the Cultural Resources Management Department on November 19, 2024. The proposed project remains located outside of Serrano ancestral territory and, as such, YSMN will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates. A2-1

Regards,

Eunice

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CA-CPUC-2023-3 ISMND.pdf
605K

Response to Letter A2 – San Manuel Band of Mission Indians

Response A2-1

The comment confirms that the Project area is outside the Serrano ancestral territory and that the Tribe will not be requesting further consultation. The comment is noted. No changes are required in the IS/MND to address the comment.

2.4.2 Applicant

This section contains responses to comments received from the Applicant (Southern California Edison).

SOUTHERN CALIFORNIA EDISON®

An EDISON INTERNATIONAL® Company

December 23, 2024

Email Only
Mr. Eric Chiang
Gorman- Kern River TLRR Project
717 Market Street, Ste. 400
San Francisco, CA 94103

Re: Southern California Edison's Comments on the Gorman-Kern River Project (A.22-02-014) Draft Initial Study/ Mitigated Negative Declaration

Dear Mr. Chiang,

On behalf of Southern California Edison Company ("SCE"), we wish to thank the California Public Utilities Commission ("CPUC") for its work in preparing and publishing the *Draft Initial Study/Mitigated Negative Declaration for the Gorman- Kern River Project*, State Clearinghouse No. 2024110564 (the "Draft IS/MND"). SCE agrees with the Draft IS/MND's conclusion that the Gorman-Kern River ("GKR") Project will not have any significant environmental impacts.

SCE respectfully submits the following minor edits/comments to the Draft IS/MND. A matrix containing SCE's proposed revisions and rationale for the proposed changes is presented in Attachment A. Suggested deletions from the Draft IS/MND are shown in ~~strikeout~~ format and suggested text additions are shown in underline format. To maintain consistency throughout the MND, SCE asks that revisions be incorporated throughout the Final IS/MND.

SCE wishes to highlight one issue identified in its comments in Appendix A, below:

> Compensatory Mitigation Ratio for Crotch's Bumblebee: SCE appreciates the time and effort required to develop mitigation measures designed to reduce or avoid potentially significant adverse Project impacts. Mitigation Measure BIO-4 identifies measures to mitigate any potential permanent or temporary impacts to Crotch's Bumblebee habitat, including compensatory mitigation at a 1:1 ratio. SCE requests that rather than establishing a compensatory mitigation ratio in this document, that the compensatory mitigation ratio for Crotch's Bumblebee be established in coordination with the California Department of Fish and Wildlife (CDFW). Unlike other species discussed in this MND, compensatory mitigation ratios for Crotch's Bumblebee are not well established. SCE would consult with CDFW to obtain an incidental take permit (if necessary). That process would allow CDFW to evaluate and establish an appropriate compensatory mitigation ratio as a verifiable performance standard that would ensure impacts to the habitat are mitigated to a less-than-significant level. SCE would comply with the mitigation measures detailed in the take authorization issued by CDFW, as well as all appropriate mitigation measures established in the MND.

B1-1

SCE appreciates the opportunity to provide comments on the IS/MND. If you have any questions regarding the letter or would like to discuss any aspect in greater detail, please contact Evie Nemeth, Regulatory Affairs Case Manager, at (951) 970-8375 and/or via email: Evie.Nemeth@sce.com.

Sincerely,

Lori Charpentier

Lori Charpentier

Southern California Edison
Regulatory Affairs Infrastructure Licensing

cc: Roxanne Henriquez, Energy Division Program and Project Supervisor
Jessica Koteen, Panorama Environmental
Susanne Heim, Panorama Environmental
Yvonne "Evie" Nemeth, Southern California Edison
Blanca G. Solares, Southern California Edison
Lauren P. Goschke, Southern California Edison

ATTACHMENT A

Chapter	Page	IS/MND Language	SCE Recommendations	
Introduction, Chapter 3, Chapter 4	MND-8; 3.4-61, 4-30	**MM BIO-5:** Pre-Construction Survey. Nest avoidance buffers may be removed at the completion of the flight season and/or once the qualified biologist deems the nesting colony is no longer active and CDFW has provided concurrence of that determination.	**Comment:** Historically CDFW has not provided concurrence prior to nest removal. Proposed revision reflects this practice. **Proposed Revision**: Nest avoidance buffers may be removed at the completion of the flight season and/or once the qualified biologist deems the nesting colony is no longer active ~~and CDFW has provided concurrence of that determination.~~	B1-2
Introduction, Chapter 3, Chapter 4	MND-10; 3.4-64, 4-33	**MM BIO-6**: Compensatory mitigation shall be required and approved by the USFWS and appropriate agency (as needed) prior to activities within blunt-nosed leopard lizard suitable habitat.	**Comment**: Proposed revisions address SCE's concerns with the timing of obtaining approval for compensatory mitigation potentially impacting start of project construction. **Proposed Revision**: SCE will coordinate with the appropriate biological resource agency to determine the compensatory mitigation for impacts to ~~Compensatory mitigation shall be required and approved by the USFWS and appropriate agency (as needed) prior to activities within~~ blunt-nosed leopard lizard suitable habitat. Prior to commencing ground-disturbing activities within suitable habitat, SCE would demonstrate to the appropriate biological resource agencies that SCE has sufficient funds available to cover the cost of compensatory mitigation.	B1-3
Introduction, Chapter 3, Chapter 4	MND-18; 3.4-71, 4-46	**MM BIO-13**: Compensatory mitigation shall be acquired and approved by USFWS (as needed) prior to activities within San Joaquin kit fox suitable habitat.	**Comment**: Proposed revisions address SCE's concerns with the timing of obtaining approval for compensatory mitigation potentially impacting start of project construction. **Proposed Revision**: SCE will coordinate with the appropriate biological resource agency to determine the compensatory mitigation for impacts to ~~Compensatory mitigation shall be acquired and approved by USFWS (as needed) prior to activities~~ San Joaquin kit fox suitable habitat. Prior to commencing ground-disturbing activities within suitable habitat, SCE would demonstrate to the appropriate biological	B1-4

Chapter	Page	IS/MND Language	SCE Recommendations	
			resource agencies that SCE has sufficient funds available to cover the cost of compensatory mitigation.	
Introduction, Chapter 3, Chapter 4	MND-22; 3.5-18, 4-57	**MM CUL-1:** Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context is the preferred method of mitigation and shall be implemented wherever feasible.	**Comment:** Proposed revision to clarify that MM CUL-1 should apply to eligible properties. **Proposed Revision**: Avoidance and preservation of eligible properties ~~the resources~~ in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context is the preferred method of mitigation and shall be implemented wherever feasible.	B1-5
Introduction, Chapter 3, Chapter 4	MND-23; 3.7-44, 3.7-45, 4-61	**MM GEO-1**: Disturbed and engineered slopes shall be monitored by qualified construction personnel on an occasional basis (bi-monthly or as needed) until the slope is fully stabilized and no longer poses an increased risk of failure or erosion as compared to similar undisturbed slopes in the immediate vicinity.	**Comment:** Proposed revision to clarify that MM Geo-1 applies to slopes disturbed by Project activities. **Proposed Revision:** Disturbed (due to grading or construction) and engineered slopes shall be monitored by qualified construction personnel on an occasional basis (bi-monthly or as needed) until the slope is fully stabilized and no longer poses an increased risk of failure or erosion as compared to similar undisturbed slopes in the immediate vicinity.	B1-6
Introduction, Chapter 3, Chapter 4	MND-25; 3.13-29, 4-68	**MM NOI-2:** For construction within Los Angeles County expected to exceed 75 dB at sensitive receptors, SCE shall notify affected residences within 1,000 feet of construction areas at least 10 days in advance of the construction activity. SCE shall also employ noise-control techniques to reduce construction noise exposure in proximity of sensitive receptors. Noise control techniques shall include:	**Comment:** As written, the mitigation measure states SCE shall employ all the listed measures anytime construction would exceed 75 dB at sensitive receptors. Proposed revision clarifies that SCE will employ some or all of the noise control techniques listed in MM NOI-2 as needed to mitigate impacts. **Proposed Revision:** For construction within Los Angeles County expected to exceed 75 dB at sensitive receptors, SCE shall notify affected residences within 1,000 feet of construction areas at least 10 days in advance of the construction activity. SCE shall also employ noise-control techniques to reduce construction noise exposure in proximity of sensitive receptors. Noise control techniques ~~shall~~ could include:	B1-7

Chapter	Page	IS/MND Language	SCE Recommendations	
Introduction, Chapter 3, Chapter 4	MND-27; 3.18-14, 4-72 & 4-73	**MM TRI-1:** Interested Tribes shall be invited to conduct Native American monitoring during all ground- disturbing activities associated with portions of or the entirety of Segment 3 of the project. A Native American monitor shall be invited to be onsite daily to coordinate with the archaeological monitors and to provide tribal perspectives in the event a discovery occurs.	**Comment:** Proposed comment clarifies how this mitigation measure ties to the GKR Cultural Resource Management Plan (CRMP). **Proposed Revision:** Interested Tribes shall be invited to conduct Native American monitoring during all ground- disturbing activities associated with portions of or the entirety of Segment 3 of the project as outlined in the CRMP. The CRMP will outline a monitoring program and establish when monitoring is needed and when monitoring can cease based on findings during monitoring. A Native American monitor shall be invited to be onsite daily to coordinate with the archaeological monitors and to provide tribal perspectives in the event a discovery occurs.	B1-8
Chapter 2	2-1	**2.1 Project Overview**: The Proposed Project is designed to remediate discrepancies and improve reliability. The Proposed Project would remediate discrepancies associated with existing subtransmission lines. Discrepancies are defined as potential clearance problems between an energized conductor and its surroundings (e.g., the structure, another energized conductor on the same structure, a different line, or the ground).	**Comment:** Proposed revision clarifies that this Project is intended to remediate G.O. 95 discrepancies. **Proposed Revision:** The Proposed Project is designed to remediate G.O. 95 discrepancies and improve reliability. The Proposed Project would remediate discrepancies associated with existing subtransmission lines. Discrepancies are defined as potential clearance problems between an energized conductor and its surroundings (e.g., the structure, another energized conductor on the same structure, a different line, or the ground).	B1-9
Chapter 2	2-21	**2.4.1 Workers Environmental Awareness Training Program:** SCE would prepare a Workers Environmental Awareness Training Program (WEAP). All project personnel would be required to attend the training, which would include the resource protection and avoidance measures as well as procedures to be followed on discovery of environmental resources.	**Comment:** Proposed revision clarifies that the WEAP requirement is incorporated into MM BIO-3. **Proposed Revision:** SCE would prepare a Workers Environmental Awareness Training Program (WEAP) as described in MM BIO-3. All project personnel would be required to attend the training, which would include the resource protection and avoidance measures as well as procedures to be followed on discovery of environmental resources.	B1-10
Chapter 2	2-23	**2.4.2 Construction Work Areas and Work Area Disturbance, Helicopter Landing Zones and Touchdown Areas**: Additional activities could be performed at helicopter landing zones within a staging area, including helicopter fueling.	**Comment**: Proposed revision makes this section consistent with the language in Section 2.4.3 that clarifies that helicopter refueling could occur at locations along the project alignment that are not identified as staging areas.	B1-11

Chapter	Page	IS/MND Language	SCE Recommendations	
			Proposed Revision: Additional activities could be performed at helicopter landing zones ~~within a~~ and staging areas, including helicopter fueling. Helicopter refueling could also occur at locations along the project alignment that are not identified as staging areas.	
Chapter2	2-26	**2.4.3 Modifications to Existing Access Roads and Spur Roads**: In some locations, road base (crushed rock), temporary plating, or matting may be placed within the existing road prism. This road base, temporary plating, or matting may be laid to compensate for soft soils. Road base, plating, or matting would be removed at the end of construction. This activity may be repeated as required during project implementation.	**Comment:** Proposed revision to distinguish road base from crushed rock and to clarify that crushed rock may be used to stabilize access and/or spur roads. SCE also proposes a revision to clarify that SCE does not plan to remove road base after the project is complete. Road base would be placed on existing access and spur roads where needed to stabilize the road and would be left on the road at the end of the project to support road stability. **Proposed Revision:** In some locations, road base, ~~(~~crushed rock~~)~~, temporary plating, or matting may be placed within the existing road prism. This road base, temporary plating, or matting may be laid to compensate for soft soils. Road base will not be removed following construction. Plating~~,~~ or matting would be removed at the end of construction. This activity may be repeated as required during project implementation.	B1-12
Chapter 2	2-26	**2.4.3 Overland Access Routes**: Approximately 2.4 miles of new overland access routes would be used during project construction. No grading or gravel placement would occur in these areas. The overland access routes would be approximately 14 feet wide. Establishment of overland access routes would involve trimming vegetation while leaving the root structure intact, or vehicles would drive over the extant vegetation (overland travel). In some locations, temporary matting may be placed on the ground surface to facilitate access to a work location. No blading, grading, or gravel placement would occur on overland access routes.	**Comment**: Proposed revision clarifies that SCE may use a blade to mow vegetation in areas where overland access is needed. Blading for overland access would be conducted such that blading would leave the root structure intact. **Proposed Revision:** Approximately 2.4 miles of new overland access routes would be used during project construction. No grading or gravel placement would occur in these areas. The overland access routes would be approximately 14 feet wide. Establishment of overland access routes would involve trimming vegetation while leaving the root structure intact, or vehicles would drive over the extant vegetation	B1-13

Chapter	Page	IS/MND Language	SCE Recommendations
			(overland travel). In some locations, temporary matting may be placed on the ground surface to facilitate access to a work location. No ~~blading,~~ grading, or gravel placement would occur on overland access routes.
Chapter 2	2-35	**2.4.6 Above Ground and Underground Conductor and Wire**: **Telecommunications** ***Overhead Installation*** Overhead OPGW installed on replacement and re-used structures would be installed simultaneously with conductor. ADSS fiber optic cable would be installed along Segment 5. ***Underground Installation*** Short sections of fiber optic cable would be installed underground at and adjacent to the existing Banducci, Gorman, and Kern River 1 hydroelectric substations. OPGW would transition from an overhead configuration to an underground configuration through risers installed on replacement of existing structures (known as getaway poles).	**Comment**: Proposed revision would clarify the scope of work to fully describe installation of overhead and underground conductor; SCE proposes incorporating descriptions included in PEA Sections 3.6.5.2.3. and 3.6.5.2.7. into IS/MND Section 2.4.6 Above Ground and Underground Conductor and Wire. **Proposed Revision**: **Conductor Removal** On any given day, crews would install sheaves and other conductor removal/installation hardware and would transfer the existing conductors into the sheaves. When all the existing structures in a given wire-pull have had sheaves and other conductor removal/installation hardware installed and the existing conductors transferred into the sheaves, the conductor would then be removed, which would require crews visiting the work pad; this would be performed in one day. **Conductor Installation** Conductor installation would generally occur over a period of three non-consecutive days. On any given day, crews would string a pulling rope or cable through sheaves installed on new TSPs or LWS poles and install new insulators and other fittings. On another day, the new conductor and OPGW would be pulled through the sheaves. On the third day of work at a given temporary work pad, crews would sag and clip- in the new conductors and OPGW. Note that the approximately three working-days on a temporary work pad would not be performed consecutively; these three days of work would occur over an approximate 10-day period.

B1-14

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Chapter 2	2-40	**2.4.8 Security**: Staging areas would be fenced and may be illuminated for security purposes. Security personnel either may patrol the staging areas periodically or be stationed at staging areas. Security measures would not be employed at construction work areas.	**Comment:** Proposed revision clarifies that although SCE is not required to use security measures at construction work areas, SCE would be permitted to do so if SCE determines such measures are necessary. **Proposed Revision**: Security Staging areas would be fenced and may be illuminated for security purposes. Security personnel either may patrol the staging areas periodically or be stationed at staging areas. Security measures ~~would not be employed~~ are not required at construction work areas.	B1-15
Chapter 2, Chapter 3, Chapter 4	2-63; 3.18-10, 4-54	**CUL-2**: SCE will perform cultural resource surveys for any portion of the proposed project APE/API not yet surveyed (e.g., new or modified staging areas, pull sites, or other work areas). Cultural resources discovered during surveys will be subject to APM CUL-1.	**Comment**: Proposed revision clarifies that APM CUL-1 has been incorporated into MM CUL-1. **Proposed Revision**: SCE will perform cultural resource surveys for any portion of the proposed project APE/API not yet surveyed (e.g., new or modified staging areas, pull sites, or other work areas). Cultural resources discovered during surveys will be subject to MM ~~APM~~ CUL-1.	B1-16
Chapter 2, Chapter 3, Chapter 4	2-66, 3.4-41; 3.9-17; 3.15-11; 4-65	**MM HAZ-3: The Project-specific Fire Prevention and Emergency Response Plan** for construction of the project will be prepared by SCE and submitted to CPUC, CALFIRE, Inyo, Kern and San Bernardino counties, and local municipal fire agencies for review at least 30 days prior to initiation of construction. SCE will address all comments received from reviewing agencies and provide the final Fire Prevention and Emergency Response Plan to reviewing agencies for approval prior to initiating construction activities.	**Comment**: Proposed revision clarifies that the Project occurs in Los Angeles and Kern counties, but not Inyo or San Bernardino Counties. **Proposed Revision:** The Project-specific Fire Prevention and Emergency Response Plan for construction of the project will be prepared by SCE and submitted to CPUC, CALFIRE, ~~Inyo~~, Kern and Los Angeles ~~San Bernardino~~ counties, and local municipal fire agencies for review at least 30 days prior to initiation of construction. SCE will address all comments received from reviewing agencies and provide the final Fire Prevention and Emergency Response Plan to reviewing agencies for approval prior to initiating construction activities.	B1-17
Chapter 2, Chapter 3, Chapter 4	2-67; 3.18-11, 4-72	**MM TCR-2**: A tribal engagement plan shall be prepared, which will detail how Native American tribes will be engaged and informed throughout the proposed project. The tribal engagement plan will be included in the CRMP (APM CUL-1).	**Comment**: Proposed revision clarifies that APM CUL-1 has been incorporated into MM CUL-1. **Proposed Revision**: A tribal engagement plan shall be prepared, which will detail how Native American tribes will be engaged and informed	B1-18

Chapter	Page	IS/MND Language	SCE Recommendations
			throughout the proposed project. The tribal engagement plan will be included in the CRMP (~~APM~~ MM CUL-1).
Chapter 3	3.3-17	**CPUC Draft Environmental Measures: Dust Control During Construction**: The Applicant shall implement measures to control fugitive dust in compliance with all local air district(s) standards. Dust control measures shall include the following at a minimum: • All exposed surfaces with the potential of dust-generating shall be watered or covered with coarse rock to reduce the potential for airborne dust from leaving the site. • The simultaneous occurrence of more than two ground disturbing construction phases on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. • Cover all haul trucks entering/leaving the site and trim their loads as necessary. • Use wet power vacuum street sweepers to sweep all paved access road, parking areas, staging areas, and public roads adjacent to project sites on a daily basis (at minimum) during construction. The use of dry power sweeping is prohibited. • All trucks and equipment, including their tires, shall be washed off prior to leaving project sites. • Apply gravel or non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas at project sites. • Water and/or cover soil stockpiles daily. • Vegetative ground cover shall be planted in disturbed areas as soon as possible and watered appropriately	**Comment**: Proposed revisions modify dust control measures to remove duplication and to improve dust control. SCE proposes to replace language associated with vehicle washing at all "project sites" with language that requires all vehicles exiting the project to exit via a stabilized entrance/exit (i.e. shaker plates) instead washing prior to leaving project sites. SCE proposes revising the measure discussing application of gravel to account for SWPPP practices and to target dust mitigation to areas most likely to generate dust. SCE proposes revising the measure discussing the application of non-toxic soil stabilizers to target application to areas where work is complete or will not occur for an extended period rather than areas that are used regularly. **Proposed Revision: CPUC Draft Environmental Measures:** Dust Control During Construction: The Applicant shall implement measures to control fugitive dust in compliance with all local air district(s) standards. Dust control measures shall include the following at a minimum: • All exposed surfaces with the potential of dust-generating shall be watered or covered with coarse rock to reduce the potential for airborne dust from leaving the site. • The simultaneous occurrence of more than two ground disturbing construction phases on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. • Cover all haul trucks entering/leaving the site and trim their loads as necessary.

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		until vegetation is established • All vehicle speeds shall be limited to fifteen (15) miles per hour or less on unpaved areas. • Implement dust monitoring in compliance with the standards of the local air district. • Halt construction during any periods when wind speeds are in excess of 50 mph.	• Use wet power vacuum street sweepers to sweep all paved access roads, parking areas, staging areas, and public roads adjacent to project sites on a daily basis (at minimum) during construction. The use of dry power sweeping is prohibited. • ~~All trucks and equipment, including their tires, shall be washed off prior to leaving project sites~~. • Temporary stabilized entrances/exits will be installed at Project ingress/egress locations to reduce the tracking of mud and dirt onto public roads by construction vehicles. • Apply gravel in staging areas where there is a potential for dust generation. • Utilize ~~or~~ non-toxic soil stabilizers in temporary disturbance areas after completion of construction to limit dust generation. ~~on all unpaved access roads, parking areas, and staging areas at project sites.~~ • Water and/or cover soil stockpiles daily. • Water sources to be determined by SCE 30-days prior to construction. • Vegetative ground cover shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. • All vehicle speeds shall be limited to fifteen (15) miles per hour or less on unpaved areas. • Implement dust monitoring in compliance with the standards of the local air district. • Halt construction during any periods when wind speeds are in excess of 50 mph.
Chapter 3	3.4-5	**3.4.2 Tipton Kangaroo Rat Reconnaissance Surveys**: McCormick Biological, Inc., conducted a reconnaissance survey for federally and state listed Tipton kangaroo rat (Dipodomys nitratoides nitratoides) within the BSA on November 15, 16, and 18, 2021 (McCormick Biological, Inc. 2022).	**Comment:** Proposed revision adds language about the Tipton kangaroo rat ("TKR") surveys completed in 2023 and the outcome of those surveys. SCE submitted the 2023 TKR survey results in response to Question 4 of Data Request #6 submitted to the Energy Division on January 19, 2024.

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			Proposed Revision*:* McCormick Biological, Inc., conducted a reconnaissance survey for federally and state listed Tipton kangaroo rat (*Dipodomys nitratoides nitratoides*) within the BSA on November 15, 16, and 18, 2021 (McCormick Biological, Inc. 2022). Additional Tipton kangaroo rat surveys were completed by Mesa Biological in October of 2023, a report was generated that included the negative survey results (Mesa Biological, LLC. 2024).	
Chapter 3	3.4-20	**Table 3.4-2: Special Status Species with Moderate to High Potential to Occur in the Proposed Project BSA:** Tipton kangaroo rat (*Dipodomys nitratoides nitratoides*) Potential to Occur: Moderate	**Comment**: Proposed revision would update the table to reflect the TKR surveys completed in 2023 which determined that TKR are not present in the project area. **Proposed Revision**: Potential to Occur: ~~Moderate~~ Low/Not Present	B1-21
Chapter 3	3.4-51	**Swainson's hawk**: MM Biology-8 requires that Swainson's hawk nest surveys be performed by a qualified biologist prior to construction and prohibits any new disturbances, habitat conversions, or other Project-related activities that may cause nest abandonment or forced fledging within 0.5 mile of an active nest between March 1 and September 15, which is the Swainson's hawk breeding season in the Project area. Because MM Biology-11 specifies requirements for pre-construction surveys and avoidance of Swainson's hawk nests, impacts to Swainson's hawks from construction activities and associated disturbances would be less than significant with mitigation.	**Comment:** Swainson's hawk surveys are preformed between March 1 and July 31. Proposed revision would revise the language to make the document internally consistent. **Proposed Revision**: MM Biology ~~8~~ 11 requires that Swainson's hawk nest surveys be performed by a qualified biologist prior to construction and prohibits any new disturbances, habitat conversions, or other Project-related activities that may cause nest abandonment or forced fledging within 0.5 mile of an active nest between March 1 and ~~September 15~~ July 31, which is the Swainson's hawk breeding season in the Project area. Because MM Biology-11 specifies requirements for pre-construction surveys and avoidance of Swainson's hawk nests, impacts to Swainson's hawks from construction activities and associated disturbances would be less than significant with mitigation.	B1-22
Introduction, Chapter 3	MND-8, 3.4-61;	**MM BIO-4**: Compensatory mitigation for permanent direct impacts to suitable Crotch's bumble bee habitat shall be offset through compensatory mitigation, which may include, but is not necessarily limited to, onsite or off-site habitat preservation, enhancement, restoration, and/or creation at a ratio of no less than 1:1.	**Comment**: Proposed revision incorporates SCE's proposal that CDFW set the compensatory mitigation ratio for this species through the incidental take permit process. **Proposed Revision**: ~~Compensatory mitigation for~~ Permanent direct impacts to suitable Crotch's bumble bee habitat shall be offset through compensatory mitigation, which may include, but is not	B1-23

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			necessarily limited to, payment into an in-lieu fee program, onsite or off-site habitat preservation, enhancement, and/or restoration~~, and/or creation at a ratio of no less than 1:1~~. Pre-construction survey methods, avoidance measures, and final mitigation requirements for this species shall be established by CDFW through the Incidental Take Permit process.	
Chapter 3	3.7-46	**3.7.4 Environmental Analysis**: The Proposed Project would disturb more the 1 acre of land and would be required to comply with the Construction Stormwater General Permit (Order Number 2009-0009- DWQ), including preparation of a project-specific Stormwater Pollution Prevention Plan. The SWPPP developed for the Proposed Project would need to include BMPs to reduce the potential for erosion and address project-specific risk factors in compliance with Order Number 2009-0009-DWQ.	**Comment:** The 2009 CGP was replaced in 2022 with ORDER WQ 2022-0057- DWQ. The new order has new SWPPP requirements. The proposed revisions remove references to the old 2009 CGP and replaces it with the updated reference. **Proposed Revision:** The Proposed Project would disturb more the 1 acre of land and would be required to comply with the Construction Stormwater General Permit (Order Number ~~2009-0009- DWQ~~ WQ 2022-0057- DWQ), including preparation of a project-specific Stormwater Pollution Prevention Plan. The SWPPP developed for the Proposed Project would need to include BMPs to reduce the potential for erosion and address project-specific risk factors in compliance with Order Number ~~2009-0009-DWQ~~ WQ 2022-0057- DWQ.	B1-24
Chapter 3	3.13-8	**Figure 3.13-1**: Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 1 of 5)	**Comment**: Map is misaligned. **Proposed Revision:** Align Map	B1-25
Chapter 3	3.13-10	**Figure 3.13-3:** Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 3 of 5)	**Comment**: Map is misaligned. **Proposed Revision:** Align Map	B1-26
Chapter 4	4-4	**4.3 Roles and Responsibilities:** During the course of construction, circumstances may arise that require deviations from the Proposed Project as approved. The CPUC, along with their environmental monitors, would evaluate any proposed deviations from the approved project to ensure they are consistent with CEQA requirements. Depending on its nature, a requested deviation would be processed as a Minor Project Refinement (MPR) or be the subject of a Petition for	**Comment:** Proposed revision clarifies language regarding when it is appropriate to use a MPR. **Proposed Revision:** During the course of construction, circumstances may arise that require deviations from the Proposed Project as approved. The CPUC, along with their environmental monitors, would evaluate any proposed deviations from the approved project to ensure they are consistent with CEQA requirements. Depending on its	B1-27

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		Modification (PFM) submitted by the Applicant. MPRs would be strictly limited to minor project changes that do not trigger additional permit requirements, do not increase the severity of an impact or create a new impact, and are within the geographic scope of the MND.	nature, a requested deviation would be processed as a Minor Project Refinement (MPR) or be the subject of a Petition for Modification (PFM) submitted by the Applicant. MPRs would be strictly limited to minor project changes that do not trigger additional permit requirements unless the appropriate agency has approved the change, do not increase the severity of an impact to a significant level or create a new significant impact that cannot be mitigated by existing mitigation measures, and are within the geographic scope of the MND.
Chapter 4	4-44	**MM BIO-11 Swainson's Hawk:** During construction: Appropriate buffers for construction activities are applied for active Swainson's hawk nests (0.5-mile radius between March 1 and September 15). No trees containing Swainson's hawk nests are removed during the nesting season.	**Comment:** Swainson's hawk surveys are preformed between March 1 and July 31. Proposed revision would revise the language to make the document internally consistent. **Proposed Revision**: During construction: Appropriate buffers for construction activities are applied for active Swainson's hawk nests (0.5-mile radius between March 1 and ~~September 15~~ July 31). No trees containing Swainson's hawk nests are removed during the nesting season.

B1-28

Response to Letter B-Southern California Edison

Response B1-1

The comment suggests that, rather than establishing a compensatory mitigation ratio in the IS/MND, the compensatory mitigation ratio for Crotch's Bumblebee be established in coordination with the California Department of Fish and Wildlife (CDFW). See response to comment A1- 6 regarding Crotch's bumblebee. No changes are required in the IS/MND to address the comment.

Response B1-2

The comment suggests revisions to MM Biology-5 to reflect historical CDFW practices for concurrence. CDFW has requested the language in the mitigation measure be added to provide CDFW with the opportunity to concur with the determination. No changes are required in the IS/MND to address the comment.

Response B1-3

The comment suggests revisions to MM Biology-6 to address concerns with the timing of obtaining approval for compensatory mitigation potentially impacting the start of construction. See response to CDFW comment A1-17 regarding compensatory mitigation for the blunt-nosed leopard lizard. No changes are required in the IS/MND to address the comment.

Response B1-4

The comment suggests revisions to MM Biology-13 to address concerns with the timing of obtaining approval for compensatory mitigation potentially impacting start of construction. See response to CDFW comment A1-15 through A1-17 regarding impacts and mitigation for the blunt-nosed leopard lizard. No changes are required in the IS/MND to address the comment.

Response B1-5

The comment suggests revisions to clarify that MM CUL-1 should apply to eligible properties. Mitigation Measure CUL-1 on page MND-22, 3.5-18 and Table 4.1-1 on page 4-57 is revised for clarity as follows:

Mitigation Measure CUL-1. Cultural Resources Management Plan: The CRMP will define and map all known NRHP- and CRHR-eligible properties in or within 100 feet (30.5 meters) of the proposed project APE/API. A cultural resources protection plan will be included that details how NRHP- and CRHR-eligible properties will be avoided and protected during construction. Avoidance and preservation of eligible properties ~~the resources~~ in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context is the preferred method of mitigation and shall be implemented wherever feasible. Measures will include, at a minimum, designation and marking of Environmentally Sensitive Areas (ESAs), archaeological monitoring, personnel training, and reporting. The plan will also detail which avoidance measures will be used, where and when they will be implemented, and how avoidance measures and enforcement of ESAs will be coordinated with construction personnel.

The changes to Mitigation Measure CUL-1 clarify that the term *resources* applies to eligible properties based on the prior sentence. The change in the mitigation measure does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-6

The comment suggests revisions to clarify that MM Geo-1 applies to slopes disturbed by Project activities. Mitigation Measure GEO-1 on page MND-23, 3.7-44 and Table 4.1-1 on page 4-60 is revised for clarity as follows:

Disturbed (due to grading or construction) and engineered slopes shall be monitored by qualified construction personnel on an occasional basis (bi-monthly or as needed) until the slope is fully stabilized and no longer poses an increased risk of failure or erosion as compared to similar undisturbed slopes in the immediate vicinity

The changes to Mitigation Measure GEO-1 clarify that only disturbed surfaces from grading or construction would require monitoring for erosion and stabilization. The change in the mitigation measure does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-7

The comment requests modification to Mitigation Measure NOI-2, page 3.13-30, and 4-67 to indicate that noise control measures "may" be used.

The application of noise control measures is required to reduce the impact from noise generation in proximity to sensitive receptors to less than significant. If the noise control measures are not implemented, the impact would be significant and unavoidable, and an Environmental Impact Report (EIR) would therefore be required. Application of the measure is not something that is optional. The requested edits to MM NOI-2 are thus not accepted.

Response B1-8

The comment suggests clarification as to how MM TRI-1 ties to the GKR Cultural Resource Management Plan (CRMP). This measure was added in response to a request by interested tribes in the area. The Tribes will be given the opportunity to monitor all work conducted that results in ground disturbing along Segment 3. This requirement would also be reflected in the CRMP. Therefore, Mitigation Measure TRI-1 on page MND-27, 3.18-14 and Table 4.1-1 on page 4-72 is revised as follows:

Interested Tribes shall be invited to conduct Native American monitoring during all ground-disturbing activities associated with portions of or the entirety of Segment 3 of the project as outlined in the CRMP. The CRMP shall outline a monitoring program and establish when monitoring is needed and when monitoring can cease based on findings during monitoring. The CRMP shall be provided to Native Americans for review and comment for 30 days. A Native American monitor shall be invited to be onsite daily to coordinate with the archaeological monitors and to provide tribal perspectives in the event a discovery occurs. The Native American monitor shall be free to visit different activity areas throughout the course of a given day, notwithstanding any limitations based on safety concerns

The changes to Mitigation Measure TRI-1 clarify that there would be details of monitoring described in the CRMP. The change in the mitigation measure does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-9

The comment suggests revisions to clarify that this Project is intended to remediate G.O. 95 discrepancies. The second paragraph under 2.1, Project Overview on Page 2-1 is revised as follows:

The Proposed Project is designed to remediate G.O 95 discrepancies and improve reliability. The Proposed Project would remediate discrepancies associated with existing subtransmission lines. Discrepancies are defined as potential clearance problems between an energized conductor and its surroundings (e.g., the structure, another energized conductor on the same structure, a different line, the ground).

The changes above clarify that that the Project is intended to remediate G.O. 95 discrepancies. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-10

The comment suggests revisions that clarify that the WEAP requirement is incorporated into MM BIO-3. The first paragraph under 2.4.1, Workers Environmental Awareness Training Program, on Page 2-21 is revised as follows:

SCE would prepare a Workers Environmental Awareness Training Program (WEAP) as described in MM Biology-3.

The changes above clarify that the WEAP requirements are described in further detail in MM Biology-3. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-11

The comment suggests that revisions be consistent with the language in Section 2.4.3, Helicopter Access, that clarifies that helicopter refueling could occur at locations along the Project alignment that are not identified as staging areas. The last sentence under 2.4.2, Construction Work Areas and Work Area Disturbance - Helicopter Landing Zones and Touchdown Areas on Page 2-23 is revised as follows:

Additional activities could be performed at helicopter landing zones and ~~within a~~ staging areas, including helicopter fueling. Helicopter refueling could also occur at locations along the project alignment that are not identified as staging areas.

The change is consistent with the language in Section 2.4.3, Helicopter Access. The change does not create any new impacts or increase the severity of impacts and only provides consistency within the IS/MND.

Response B1-12

The comments suggest revision to distinguish road base from crushed rock and to clarify that crushed rock may be used to stabilize access and/or spur roads. The comment also suggests revisions to clarify that SCE does not plan to remove road base after the project is complete. Road base would be placed on existing access and spur roads where needed to stabilize the road and would be less on the road at the end of the project to support road stability. The first paragraph under 2.4.3, Construction Access - Modifications to Existing Access Roads and Spur Roads on Page 2-26 is revised for clarity as follows**:**

Approximately 84 miles of existing access and spur roads would be used for project construction. All existing access and spur roads are expected to require rehabilitation work, including regrading and repairing the existing roadbeds. Access and spur roads would be cleared of vegetation; blade-graded to remove potholes, ruts, and other surface irregularities; and re-compacted to provide a smooth and dense riding surface, capable of supporting heavy construction equipment. As part of the rehabilitation, vegetation within and along the existing road prism may be trimmed and/or removed to prevent vegetation from intruding into the roadway. In some locations, road base, crushed rock, ~~(crushed rock),~~ temporary plating, or matting may be placed within the existing road prism. This road base, temporary plating, or matting may be laid to compensate for soft soils. Road base will not be removed following construction. Plating ~~, plating,~~ or matting would be removed at the end of construction. This activity may be repeated as required during project implementation.

The clarification does not change the impact analysis in the IS/MND as it was assumed that all areas of road based would be disturbed. The clarification reflects the practical consideration that it is not feasible to remove road base after applied. The change does

not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-13

The comment suggests revisions to clarify that SCE may use a blade to mow vegetation in areas where overland access is needed. Blading for overland access would be conducted such that blading would leave the root structure intact. The paragraph under 2.4.3, Construction Access – Overland Access Routes on Page 2-26 is revised for clarity as follows**:**

Approximately 2.4 miles of new overland access routes would be used during project construction. No grading or gravel placement would occur in these areas. The overland access routes would be approximately 14 feet wide. Establishment of overland access routes would involve trimming vegetation while leaving the root structure intact, or vehicles would drive over the extant vegetation (overland travel). In some locations, temporary matting may be placed on the ground surface to facilitate access to a work location. No ~~blading,~~ grading, or gravel placement would occur on overland access routes.

The clarification does not change the impact analysis in the IS/MND as "blading" was deleted from the language because vegetation removal may in fact occur with blading equipment. However, the use of blading equipment would not grade the soil or change the disturbance as analyzed. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-14

The comment suggests revisions to clarify the scope of work to fully describe installation of overhead and underground conductor as described in the PEA Sections 3.6.5.2.3. and 3.6.5.2.7. The additional description under 2.4.6, Above Ground and Underground Conductor and Wire on Page 2-35 is added as follows**:**

<u>Conductor Removal</u>

<u>On any given day, crews would install sheaves and other conductor removal/installation hardware and would transfer the existing conductors into the sheaves. When all the existing structures in a given wire- pull have had sheaves and</u>

other conductor removal/installation hardware installed and the existing conductors transferred into the sheaves, the conductor would then be removed, which would require crews visiting the work pad; this would be performed in one day.

Conductor Installation

Conductor installation would generally occur over a period of three non-consecutive days. On any given day, crews would string a pulling rope or cable through sheaves installed on new TSPs or LWS poles and install new insulators and other fittings. On another day, the new conductor and OPGW would be pulled through the sheaves. On the third day of work at a given temporary work pad, crews would sag and clip- in the new conductors and OPGW. Note that the approximately three working-days on a temporary work pad would not be performed consecutively; these three days of work would occur over an approximate 10-day period.

The clarification does not change the impact analysis in the IS/MND but rather provides additional details as described in SCEs PEA. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-15

The comment suggests revisions to clarify that, although SCE is not required to use security measures at construction work areas, SCE would be permitted to do so if SCE determines whether such measures are necessary. The paragraph under 2.4.8, Public Safety and Traffic Management-Security on Page 2-40 is revised as follows:

Staging areas would be fenced and may be illuminated for security purposes. Security personnel either may patrol the staging areas periodically or be stationed at staging areas. Security measures are not required ~~would not be employed~~ at construction work areas.

The clarification does not change the impact analysis in the IS/MND but rather provides clarification that security measures would not be required. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-16

The comment suggests revisions to clarify that APM CUL-1 has been incorporated into MM CUL-1. Applicant Proposed Measure CUL-2 on page 2-63, page 3.18-10 and Table 4.1-1 on page 4-54 is revised as follows:

Avoid Environmentally Sensitive Areas (ESA). SCE will perform cultural resource surveys for any portion of the proposed project APE/API not yet surveyed (e.g., new or modified staging areas, pull sites, or other work areas). Cultural resources discovered during surveys will be subject to MM~~APM~~ CUL-1 (Develop CRMP).

The change above does not change the impact analysis in the IS/MND but rather provides a correction. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-17

The comment suggests a revision to clarify that the Project occurs in Los Angeles and Kern counties, but not Inyo or San Bernardino counties. Applicant Proposed Measure HAZ-3 on page 2-66, page 3.4-41, page 3.9-17, page 3.15-44 and Table 4.1-1 on page 4-65 is revised as follows:

The Project-specific Fire Prevention and Emergency Response Plan for construction of the project will be prepared by SCE and submitted to CPUC, CALFIRE~~, Inyo,~~ Kern and Los Angeles ~~San Bernardino~~ counties, and local municipal fire agencies for review at least 30 days prior to initiation of construction. SCE will address all comments received from reviewing agencies and provide the final Fire Prevention and Emergency Response Plan to reviewing agencies for approval prior to initiating construction activities.

The change above does not change the impact analysis in the IS/MND but rather provides a correction. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-18

The comment suggests a revision that clarifies that APM CUL-1 has been incorporated into MM CUL-1. Applicant Proposed Measure TCR-2 on page 2-67, page 3.18-11 and Table 4.1-1 on page 4-72 is revised as follows:

A tribal engagement plan shall be prepared, which will detail how Native American tribes will be engaged and informed throughout the proposed project. The tribal engagement plan will be included in the CRMP (Mitigation Measure ~~APM~~ CUL-1).

The change above does not change the impact analysis in the IS/MND but rather provides a correction. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-19

The comment suggests a revision to modify dust control measures to remove duplication and to improve dust control. SCE proposes to replace language associated with vehicle washing at all "project sites" with language that requires all vehicles exiting the project to exit via a stabilized entrance/exit (i.e. shaker plates) instead of washing prior to leaving project sites. SCE proposes revising the measure discussing application of gravel to account for SWPPP practices and to target dust mitigation to areas most likely to generate dust. SCE proposes revising the measure discussing the application of nontoxic soil stabilizers to target application to areas where work is complete or will not occur for an extended period rather than areas that are used regularly. The suggestions are consistent with the dust control measures described in Section 2.4.9 Site Management and Waste Disposal of the Draft IS/MND. CPUC Draft Environmental Measure Dust Control During Construction on Page 3.3-17 is revised as follows:

The Applicant shall implement measures to control fugitive dust in compliance with all local air district(s) standards. Dust control measures may include: ~~shall include the following at a minimum~~

The change above does not change the impact analysis in the IS/MND but rather provides clarification of comparable measures that SCE will be employing for dust control. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-20

The comment suggests revisions that add language about the Tipton kangaroo rat (TKR) surveys completed in 2023 and the outcome of those surveys. The paragraph

under 3.4.2, Tipton Kangaroo Rat Reconnaissance Surveys, on Page 3.4-5 is revised as follows:

McCormick Biological, Inc., conducted a reconnaissance survey for federally and state listed Tipton kangaroo rat (*Dipodomys nitratoides nitratoides*) within the BSA on November 15, 16, and 18, 2021 (McCormick Biological, Inc. 2022). Additional Tipton kangaroo rat surveys were completed by Mesa Biological in October of 2023, a report generated that included the negative survey results (Mesa Biological, LLC. 2024). The purpose of this reconnaissance survey was to evaluate the potential for suitable habitat for Tipton kangaroo rat to occur within the Proposed Project area.

The change above does not change the impact analysis in the IS/MND but rather provides clarification in the form of updated survey results. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-21

The comment suggests revisions to update the table to reflect the Tipton kangaroo rat surveys completed in 2023, which determined that Tipton kangaroo rat is not present in the Project area. Page 11 of the Master Species List in Appendix D12 and Table 3.4-2 on page 3.4-20 is revised as follows:

Tipton kangaroo rat (Dipodomys nitratoides nitratoides)	FE, CE	Grasslands and scrub communities; soft friable soils in areas not subject to seasonal flooding areas	One recent CNDDB occurrence record from 1999, 0.8 mile from the BSA; burrows observed within the BSA, in Segments 1 and 2	~~Moderat e~~-Low/ Not Present

The change above does not change the impact analysis in the IS/MND but rather provides clarification of updated survey results. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-22

The comment suggests that a revision be made to provide consistency with other dates in the Draft MND/IS. The first full paragraph on Page 3.4-51 is revised as follows**:**

Swainson's hawk: A Swainson's hawk was observed foraging within the Proposed Project area. Swainson's hawks are particularly sensitive to changes in disturbance levels (e.g., new activity in a formerly undisturbed location) and are prone to abandonment of nest sites. Construction activities could impact nesting behavior of Swainson's hawk for up to 0.5 mile and could cause nest abandonment, which would be a significant impact absent mitigation. MM Biology-~~8~~ 11 requires that Swainson's hawk nest surveys be performed by a qualified biologist prior to construction and prohibits any new disturbances, habitat conversions, or other Project-related activities that may cause nest abandonment or forced fledging within 0.5 mile of an active nest between March 1 and July 31 ~~September 15~~, which is the Swainson's hawk breeding season in the Project area. Because MM Biology-11 specifies requirements for pre-construction surveys and avoidance of Swainson's hawk nests, impacts to Swainson's hawks from construction activities and associated disturbances would be less than significant with mitigation.

The change above does not change the impact analysis in the IS/MND but rather provides a correction to reflect the breeding season for the species in the area. The change does not create any new impacts or increase the severity of impacts and only provides a correction.

Response B1-23

The comment suggests revision to SCE's proposal that CDFW set the compensatory mitigation ration for this species through the incidental take permit process. See response to comments A1-4 through 6 and B1-1 regarding the impact analysis and mitigation measures associated with Crotch's bumblebee. No changes are required in the IS/MND to address the comment.

Response B1-24

The comment states that the 2009 CGP was replaced in 2022 with Order WQ 2022-0057-DWQ. The new order has new SWPPP requirements. The comment suggests revisions to remove references to the old 2009 CGP and replace it with the updated reference. The first full paragraph on Page 3.7-46 is revised as follows:

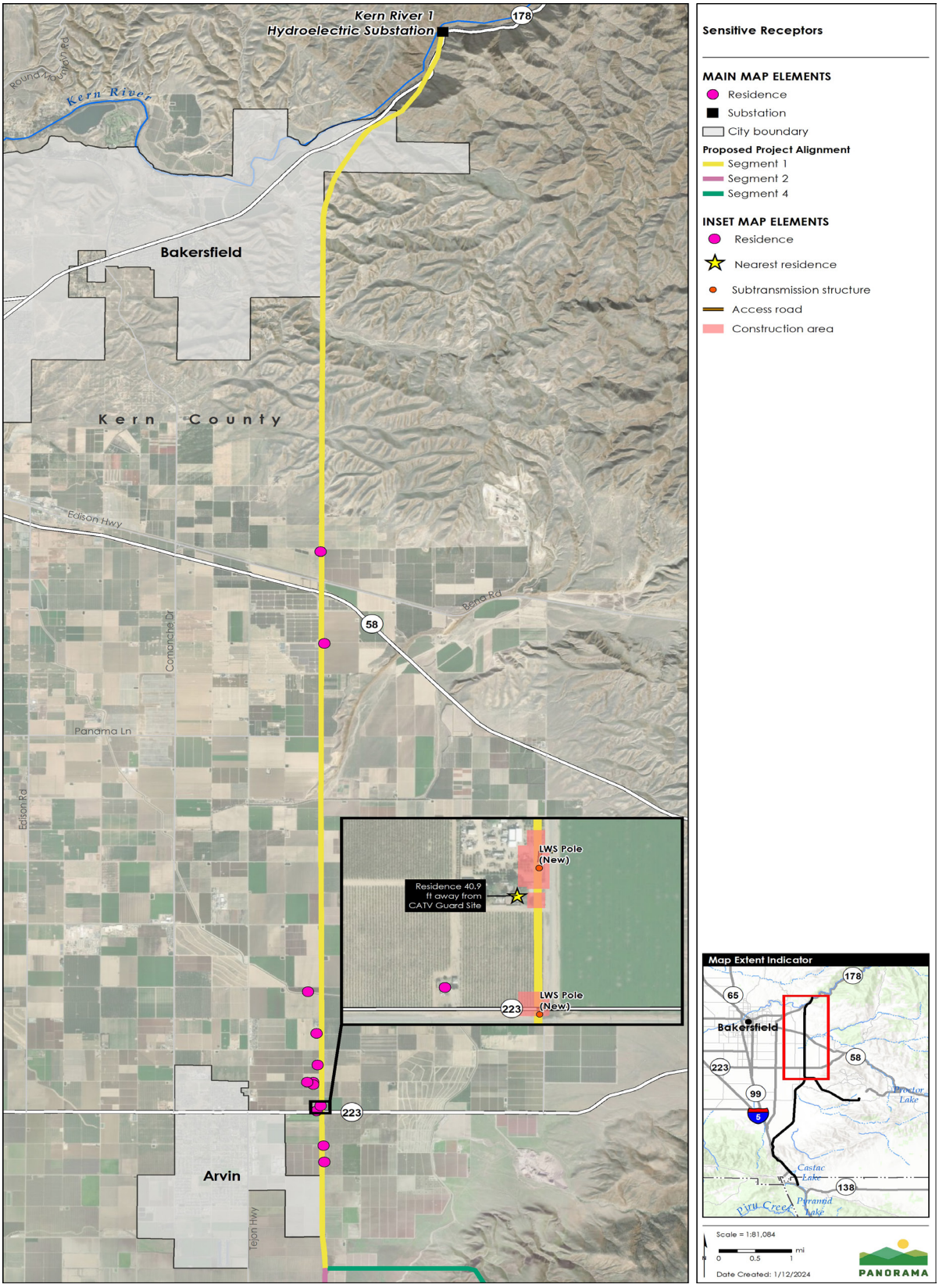
The Proposed Project would disturb more the 1 acre of land and would be required to comply with the Construction Stormwater General Permit (Order Number WQ 2022-0057-DWQ ~~2009-0009-DWQ~~), including preparation of a project-specific Stormwater Pollution Prevention Plan. The SWPPP developed for the Proposed Project would need to include BMPs to reduce the potential for erosion and address project-specific risk factors in compliance with Order Number WQ 2022-0057-DWQ ~~2009-0009-DWQ~~. The SWPPP would include measures such as silt fencing, straw waddles, geotextiles, and other BMPs to control sediment and erosion. The Construction General Permit also requires implementation of permanent BMPs including revegetation of areas of disturbance. Impacts would be less than significant due to compliance with the requirements of the Construction Stormwater General Permit. No mitigation is required.

The change above does not change the impact analysis in the IS/MND but rather provides a correction to reflect the current permit number. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-25: Align Map

The comment states that Figure 3.13-1, Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 1 of 5), is misaligned. Please see the updates to the figure that corrects the alignment.

Figure 3.13-1 Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 1 of 5)

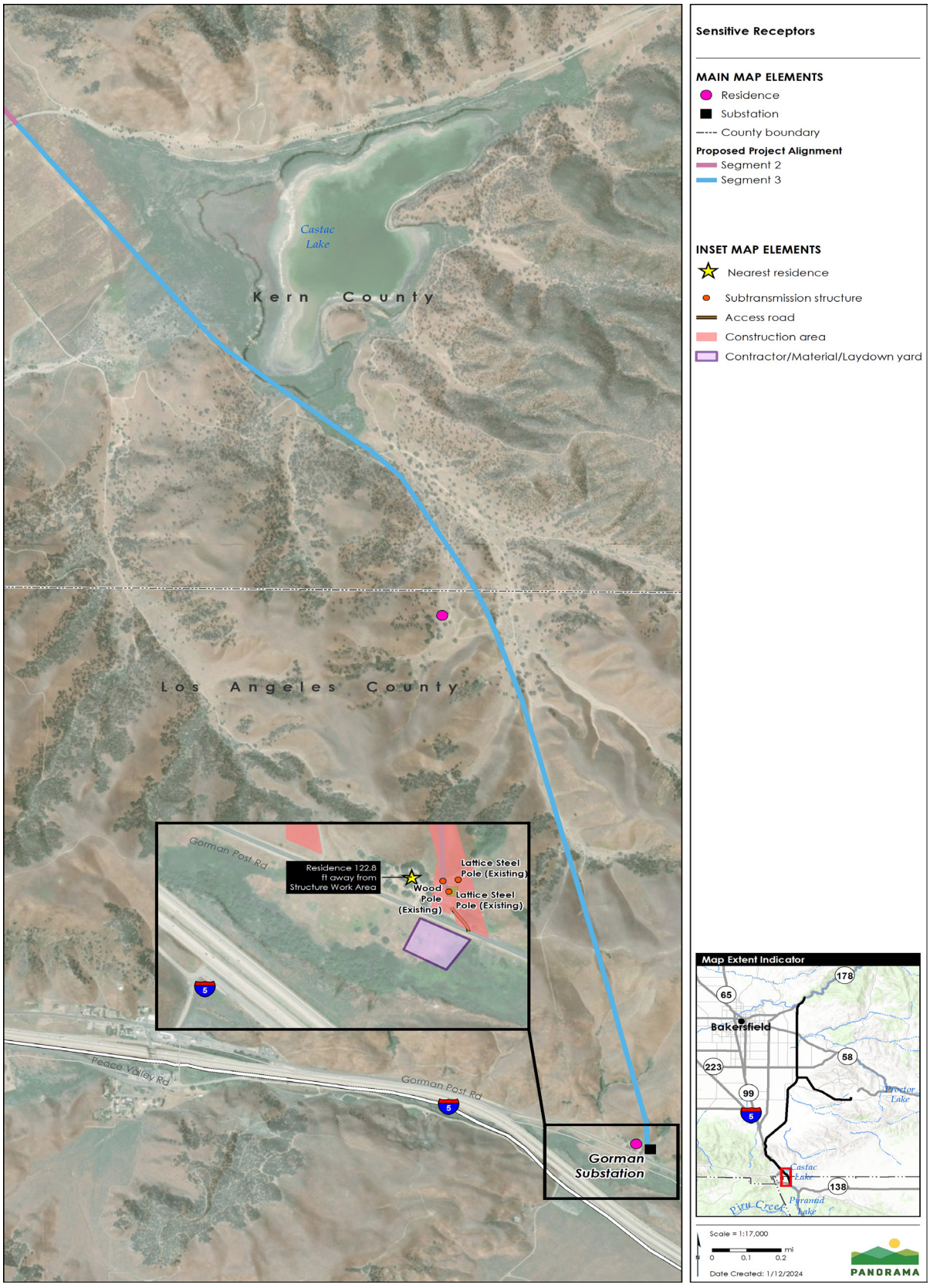


The figure change does not change the impact analysis in the IS/MND but rather provides a correction. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-26: Align Map

The comment states that Figure 3.13-3, Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 3 of 5), is misaligned. Please see the updates to the figure that corrects the alignment.

Figure 3.13-3 Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 3 of 5)



The figure change does not change the impact analysis in the IS/MND but rather provides a correction. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-27

The comment suggests a revision to clarify language regarding when it is appropriate to use a Minor Project Refinement (MPR). The sixth paragraph under 4.3 Roles and Responsibilities on page 4-4 is revised as follows:

MPRs would be strictly limited to minor project changes that do not trigger additional permit requirements unless the appropriate agency has approved the change, do not increase the severity of an impact to a significant level or create a new significant impact that cannot be mitigated by existing mitigation measures, and are within the geographic scope of the MND

The clarification does not change the impact analysis in the IS/MND but rather provides further clarification of when it is appropriate to use an MPR. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

Response B1-28

The comment suggests that a revision be made to provide consistency with other dates in the Draft MND/IS. See response to comment A1-27 for revisions. This revision does not change the impact analysis in the IS/MND but rather provides correction. The change does not create any new impacts or increase the severity of impacts and only provides corrections.

2.4.3 Private

This section contains responses to comments received from private individuals.

Gmail

Jessica Koteen <jessica.koteen@panoramaenv.com>

Fwd: Kern Project Components within Black Oaks Ranch

1 message

Jessica Koteen <jessica.koteen@panoramaenv.com>
To: Jessica Koteen <KernRiverTLRR@panoramaenv.com>

Thu, Nov 21, 2024 at 4:39 PM

---------- Forwarded message ---------
From: **Dan W. Baer** <db@scsdinc.com>
Date: Thu, Nov 21, 2024 at 4:31 PM
Subject: Re: Kern Project Components within Black Oaks Ranch
To: Jessica Koteen <jessica.koteen@panoramaenv.com>
Cc: Chiang, Eric <eric.chiang@cpuc.ca.gov>

Good afternoon Jessica,

Thank you for the information and maps which very clearly identifies the work sites. Am I correct to assume that all work and vehicles will be conducted within the easement boundaries and each site will be clear of all debris and left in the same or better condition than before work commenced?

Happy Thanksgiving to you and yours,

C1-1

Dan

Dan W. Baer, President
Southern California Sunbelt Developers, Inc.

This email may contain confidential and privileged material for the sole use of the intended recipient; any other use is prohibited; If you are not the intended recipient, please contact the sender by reply email and delete all copies of this message, and do not forward it or any part of it to anyone else. Thank you for your cooperation and understanding.

On 11/21/2024 3:28 PM, Jessica Koteen wrote:

> Good afternoon Dan,
>
> Per our conversation I am attaching the 2 maps that show the project in relation to Black Oaks Ranch. I have also attaching 2 images that show the specific work areas within those sections (Section 15 and 22).
>
> There are 24 construction areas that overlap with sections 15 and 22 - but only the northern portion of section 22 is within the ranch property, it looks like the pull site is right on the edge. There are 10 demo sites, 4 pull sites, and 10 structure work areas. And there is also one possible construction staging area in section 15 (Bear Valley Rd.)
>
> Please let me know if you have any other questions and if you would like to provide a comment on the environmental document and analysis that was completed, please email me a comment via the project email at: KernRiverTLRR@panoramaenv.com
>
> Thank you!
>
> --
>
> **Jessica Koteen, Senior Manager**
> **Panorama Environmental, Inc.**
>
> **717 Market Street, Suite 400**
>
> **San Francisco, CA 94103**
>
> c.323.646.0237

--

Jessica Koteen, Senior Manager
Panorama Environmental, Inc.

717 Market Street, Suite 400

San Francisco, CA 94103

c.323.646.0237

Response to Letter C - Dan M. Baer, Southern California Sunbelt Developers, Inc.

Response C1-1

The commentor is the owner of Black Oaks Ranch, located along portions of Segment 4. The ranch includes APN 447-041-15-3, which is within the Project work area. The commentor requests confirmation that all work areas and vehicles would be conducted within the easement boundaries and each site would be clear of all debris and left in the same or better condition that before work commenced.

As discussed in Section 2.3, Right-of Way and Easements, SCE does not possess sufficient ROW or easements for portions of Segment 4, which may include portions of APN 447-041-15-3. SCE would seek to obtain up to a 70-foot ROW for the subtransmission lines where existing ROW is insufficient, and as shown in Figure 2-11 of the Draft IS/MND. However, the specific width of the required easements would be developed during the final engineering process. New permanent easements over private lands would be obtained by SCE through negotiations with landowners.

In addition, some off-alignment construction work areas may require a temporary construction easement, including Bear Valley Road staging area, located on parcel 447-041-15-3. SCE would work with the appropriate landowners to acquire any necessary temporary construction easements and/or temporary entry permits.

In regard to site restoration, beginning on page 3-66 of the Proponents Environmental Assessment (Section 3.7.3, Demolition and Site Restoration), plan detail for site restoration is included. The Proponents Environmental Assessment can be viewed on the project website, which is as follows: https://ia.cpuc.ca.gov/environment/info/panoramaenv/Kern_River/index.html

2.4.4 Form Letter

This section contains responses to comments received in a form letter.

Gmail

Jessica Koteen <jessica.koteen@panoramaenv.com>

Subject: Strong Opposition to Gorman-Kern River 66 kV Project and SCE's Mismanagement

1 message

amber.stanton.bell <amber.stanton.bell@gmail.com>
To: KernRiverTLRR@panoramaenv.com

Sun, Dec 1, 2024 at 8:22 PM

To Whom It May Concern,

I am writing to express my firm opposition to the Gorman-Kern River 66 kV Transmission Line Project, as outlined in the Initial Study/Mitigated Negative Declaration (IS/MND). While maintaining and upgrading powerlines is undoubtedly necessary, this project does not address the root issue: Southern California Edison's (SCE) longstanding negligence and failure to maintain its infrastructure. This burden, once again, is being unfairly placed on the shoulders of California's overburdened consumers.

For years, SCE has shirked its responsibility to properly maintain and upgrade its aging infrastructure. This failure has directly contributed to the state's ongoing issues with wildfires, power outages, and environmental hazards. Let us not forget that SCE has been implicated in catastrophic wildfires, including the 2017 Thomas Fire and the 2018 Woolsey Fire, which collectively caused billions of dollars in damages and countless lives lost. These tragedies were avoidable had the company prioritized maintenance and safety instead of profits.

Meanwhile, Californians continue to endure some of the highest electricity rates in the nation, with average residential rates exceeding 30 cents per kilowatt-hour—nearly double the national average. These rates have skyrocketed 116% since 2000, far outpacing inflation and wage growth. Families and small businesses alike are being crushed under the weight of ever-increasing energy costs, all while SCE passes the cost of its failures onto consumers.

C2-1

California already ranks as one of the most expensive states in the nation, with crippling housing costs, exorbitant taxes, and unaffordable energy bills driving residents to leave the state in record numbers. Yet, SCE's mismanagement and the state's over-regulation continue to compound these challenges. For how long will Californians be forced to bear the consequences of corporate greed and regulatory failure?

If SCE wants to rebuild 65 miles of powerlines and upgrade substations, they must do so without further burdening the very people they claim to serve. The funding for this project should come from SCE's profits—not from additional rate hikes on already-struggling Californians. SCE executives and shareholders must be held accountable for decades of negligence and mismanagement.

The California Public Utilities Commission (CPUC) should reject this project until SCE demonstrates a clear plan for funding it without passing costs to consumers. Furthermore, SCE must commit to transparency and a long-term strategy for maintaining its infrastructure to prevent future disasters.

It's time to stop asking Californians to pay for corporate failures. The people of this state deserve affordable energy, safe infrastructure, and accountability from utilities like SCE. Anything less is unacceptable.

Regards,
Amber Bell.

Psalms 46:5

Response D1-1

The comment addresses the merits of the Project and is not applicable to the analysis of environmental impacts under CEQA. The comment is noted, and no changes are required in the IS/MND to address the comment.

2.5 Revisions to the IS/MND

As a result of comments, some changes have been made to the previously published text of the IS/MND. Changes include: minor corrections made to improve writing clarity, grammar, and consistency; clarifications, additions, or deletions resulting from specific responses to comments; and text changes to update information in the IS/MND. These text revisions are included following each response in Section 2.4 above that warranted a revision as well as summarized below. The specific additions and deletions use the following conventions:

- Text deleted from the IS/MND is shown in strike out text.
- Text added to the IS/MND is shown as underlined text.

In addition to the changes included in Section 2.4, the following revisions are also made in response to changes in the project schedule.

2.5.1 Changes to MND Introduction

On Page MND-2, the following revision is included under the heading "Project Description":

Project Description

The Proposed Project would be located in Kern County and Los Angeles County and would involve rebuilding 65.3 miles of existing 66 kV subtransmission circuits by removing and replacing existing subtransmission towers and poles; removing and replacing existing conductor; installing optical ground wire; and modifying existing substations facilities associated with the powerline. No new subtransmission lines or substations would be constructed as part of the Proposed Project. SCE's stated objectives of the Proposed Project are to ensure compliance with CPUC G.O. 95 standards and address reliability concerns related to the condition of existing infrastructure on the affected subtransmission lines. Construction of the proposed project is preliminarily scheduled to begin in ~~2026~~ 2027. The construction start date would depend on CPUC approval and would last approximately ~~23~~ 26 months.

2.5.2 Changes to Section 2, Project Description

The second paragraph under 2.1, Project Overview on Page 2-1 is revised as follows:

> The Proposed Project is designed to remediate G.O 95 discrepancies and improve reliability. The Proposed Project would remediate discrepancies associated with existing subtransmission lines. Discrepancies are defined as potential clearance problems between an energized conductor and its surroundings (e.g., the structure, another energized conductor on the same structure, a different line, or the ground).

The first paragraph under 2.4.1, Workers Environmental Awareness Training Program, on Page 2-21 is revised as follows:

> SCE would prepare a Workers Environmental Awareness Training Program (WEAP) as described in MM Biology-3.

The last sentence under 2.4.2, Construction Work Areas and Work Area Disturbance - Helicopter Landing Zones and Touchdown Areas on Page 2-23 is revised as follows:

> Additional activities could be performed at helicopter landing zones and within a staging areas, including helicopter fueling. Helicopter refueling could also occur at locations along the project alignment that are not identified as staging areas.

The first paragraph under 2.4.3, Construction Access - Modifications to Existing Access Roads and Spur Roads on Page 2-26 is revised for clarity as follows**:**

> Approximately 84 miles of existing access and spur roads would be used for project construction. All existing access and spur roads are expected to require rehabilitation work, including regrading and repairing the existing roadbeds. Access and spur roads would be cleared of vegetation; blade-graded to remove potholes, ruts, and other surface irregularities; and re-compacted to provide a smooth and dense riding surface, capable of supporting heavy construction equipment. As part of the rehabilitation, vegetation within and along the existing road prism may be trimmed and/or removed to prevent vegetation from intruding into the roadway. In some locations, road base, crushed rock, (crushed rock), temporary plating, or matting may be placed within the existing road

prism. This road base, temporary plating, or matting may be laid to compensate for soft soils. Road base will not be removed following construction. Plating , plating, or matting would be removed at the end of construction. This activity may be repeated as required during project implementation.

The paragraph under 2.4.3, Construction Access – Overland Access Routes on Page 2-26 is revised for clarity as follows**:**

Approximately 2.4 miles of new overland access routes would be used during project construction. No grading or gravel placement would occur in these areas. The overland access routes would be approximately 14 feet wide. Establishment of overland access routes would involve trimming vegetation while leaving the root structure intact, or vehicles would drive over the extant vegetation (overland travel). In some locations, temporary matting may be placed on the ground surface to facilitate access to a work location. No blading, grading, or gravel placement would occur on overland access routes.

The additional description under 2.4.6, Above Ground and Underground Conductor and Wire on Page 2-35 is added as follows**:**

Conductor Removal

On any given day, crews would install sheaves and other conductor removal/installation hardware and would transfer the existing conductors into the sheaves. When all the existing structures in a given wire- pull have had sheaves and other conductor removal/installation hardware installed and the existing conductors transferred into the sheaves, the conductor would then be removed, which would require crews visiting the work pad; this would be performed in one day.

Conductor Installation

Conductor installation would generally occur over a period of three non-consecutive days. On any given day, crews would string a pulling rope or cable through sheaves installed on new TSPs or LWS poles and install new insulators and other fittings. On another day, the new conductor and OPGW would be pulled through the sheaves. On the third day of work at a given temporary work pad, crews would sag and clip- in the new conductors and OPGW. Note that the

approximately three working-days on a temporary work pad would not be performed consecutively; these three days of work would occur over an approximate 10-day period.

The clarification does not change the impact analysis in the IS/MND but rather provides additional details as described in SCEs PEA. The change does not create any new impacts or increase the severity of impacts and only provides clarification.

The paragraph under 2.4.8, Public Safety and Traffic Management-Security on Page 2-40 is revised as follows:

Staging areas would be fenced and may be illuminated for security purposes. Security personnel either may patrol the staging areas periodically or be stationed at staging areas. Security measures are not required would not be employed at construction work areas.

On Page 2-56, under the heading "2.4.16 Construction and Work Schedule" includes the following revision:

Project construction is anticipated to take approximately 23 26 months. Construction is anticipated to begin in May 2027 ~~June 2026~~ and end in July 2029 ~~May 2028~~. Some activities may be performed concurrently; for instance, pull-and-tension/stringing sites may be established at the same time as guard structures are being installed, and the restoration of disturbed areas may occur at the same time as staging area demobilization and restoration is occurring. Furthermore, work could occur in one or more segments simultaneously.

2.5.3 Changes to Section 3.3, Air Quality

CPUC Draft Environmental Measure Dust Control During Construction on Page 3.3-17 is revised as follows:

The Applicant shall implement measures to control fugitive dust in compliance with all local air district(s) standards. Dust control measures may include: shall include the following at a minimum

The following tables on Pages 3.3-28 and 3.3-29 of Section 3.3, Air Quality, are revised as follows:

Table 2.5-1 Estimated Construction Annual Air Pollution Emissions (tons/year) within SJVAB

Year/criteria	VOC	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Uncontrolled emissions						
~~2024~~ 2027	0.18	1.72	1.23	0.01	21.6	2.38
~~2025~~ 2028	0.78	6.42	5.78	0.03	83.7	8.58
~~2026~~ 2029	1.20	4.64	5.41	0.02	56.7	7.54
SJVAPCDThreshold	10	10	100	27	15	15
Threshold Exceeded?	No	No	No	No	Yes	No
Controlled emissions						
~~2024~~ 2027	0.18	1.72	1.23	0.01	1.55	0.21
~~2025~~ 2028	0.78	6.42	5.78	0.03	5.76	0.79
~~2026~~ 2029	1.20	4.64	5.41	0.02	4.32	0.64
SJVAPCD threshold	10	10	100	27	15	15
Threshold exceeded?	No	No	No	No	No	No

Source: (SCE 2022)

Table 2.5-2 Estimated Construction Annual Air Pollution Emissions (tons/year) within EKAB

Year/criteria	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Uncontrolled emissions						
~~2024~~ 2027	0.03	0.28	0.20	<0.01	3.47	0.38
~~2025~~ 2028	0.12	1.03	0.93	<0.01	13.5	1.38
2026 2029	0.19	0.75	0.87	<0.01	9.11	1.21
EKAPCD threshold	25	25	-	27	15	-
Threshold exceeded?	No	No	-	No	No	-
Controlled emissions						
~~2024~~ 2027	0.03	0.28	0.20	<0.01	0.25	0.03
~~2025~~ 2028	0.12	1.03	0.93	<0.01	0.93	0.13

Year/criteria	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
~~2026~~ 2029	0.19	0.75	0.87	<0.01	0.69	0.10
EKAPCD threshold	25	25	-	27	15	-
Threshold exceeded?	No	No	-	No	No	-

Source: (SCE 2022)

Table 2.5-3 Estimated Uncontrolled Construction Annual Air Pollution Emissions (pounds/day) within SCAB

Year/criteria	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Uncontrolled emissions						
~~2024~~ 2027	5.62	83.9	26.6	0.40	98.2	12.0
~~2025~~ 2028	8.05	55.5	35.7	0.32	113	13.2
~~2026~~ 2029	20.2	46.4	62.8	0.28	193	21.5
SCAQMD threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	Yes	No
Controlled emissions						
~~2024~~ 2027	5.62	83.9	26.6	0.40	21.1	4.26
~~2025~~ 2028	8.05	55.5	35.7	0.32	22.9	4.21
~~2026~~ 2029	20.2	46.4	62.8	0.28	40.9	6.32
SCAQMD threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: (SCE 2022)

Equipment efficiency would increase in the future due to regulatory requirements. The delay in construction would result in lower emissions levels than those estimated in the IS/MND. As a result, the construction delay would not result in a new significant impact or increase in the severity of an air quality impact.

2.5.4 Changes to Section 3.4, Biological Resources

The paragraph under 3.4.2, Tipton Kangaroo Rat Reconnaissance Surveys, on Page 3.4-5 is revised as follows:

> McCormick Biological, Inc., conducted a reconnaissance survey for federally and state listed Tipton kangaroo rat (*Dipodomys nitratoides nitratoides*) within the BSA on November 15, 16, and 18, 2021 (McCormick Biological, Inc. 2022). Additional Tipton kangaroo rat surveys were completed by Mesa Biological in October of 2023, a report generated that included the negative survey results (Mesa Biological, LLC. 2024). The purpose of this reconnaissance survey was to evaluate the potential for suitable habitat for Tipton kangaroo rat to occur within the Proposed Project area.

Page 11 of the Master Species List in Appendix D12 and Table 3.4-2 on page 3.4-20 is revised as follows:

Tipton kangaroo rat (Dipodomys nitratoides nitratoides)	FE, CE	Grasslands and scrub communities; soft friable soils in areas not subject to seasonal flooding areas	One recent CNDDB occurrence record from 1999, 0.8 mile from the BSA; burrows observed within the BSA, in Segments 1 and 2	~~Moderat e~~ Low/ Not Present

The analysis on page 3.4-45 of the IS/MND is revised as shown to include reference to MM Biology-2, Habitat Restoration to reduce impacts on Crotch's bumble bee:

> **Crotch's bumblebee:** Crotch's bumble bee foraging and nesting habitat is present throughout the majority of the Proposed Project area, and individuals have been observed in habitat similar to that found in the to the Proposed Project area in Kern County. Crotch's bumblebee nest underground in burrows and can establish a new nest each year. If a nest of Crotch's bumble bee were to occur in the Proposed Project area at the time of construction, the impact from destruction of a nest would be significant. In addition, the impact on suitable habitat for Crotch's bumble bee would be significant. MM Biology-2 would be implemented and requires SCE to prepare and implement a Revegetation, Restoration, and

Monitoring Plan, including specific procedures and performance standards to ensure temporarily disturbed habitats are adequately restored following construction. MM Biology-4 requires focused surveys for Crotch's bumble bee a season prior to construction, pre-construction surveys immediately prior to construction, monitoring of nest avoidance for any Crotch's bumblebee in proximity to a work area, and compensatory mitigation for impacts on Crotch's bumblebee habitat. With implementation of Mitigation Measure Biology-2 and Mitigation Measure Biology-4, the impact on Crotch's bumble bee would be less than significant with mitigation.

The text on page 3.4-46 of the Draft IS/MND referencing the mitigation measure for Kern Canyon slender salamander is corrected as follows:

MM Biology-~~6~~7 requires compensatory mitigation for permanent impacts to habitat for Tehachapi slender salamander and Kern Canyon slender salamander.

The analysis of impacts on eagles is updated on page 3.4-50 and 3.4-51 as follows:

Bald eagle and golden eagle: Bald eagles have a high potential to occur in the Proposed Project area due to the presence of suitable habitat; no bald eagle nests have been observed in the Proposed Project area. Golden eagles have been observed foraging and nesting within the Proposed Project area. Golden eagles are particularly sensitive to noise and other anthropogenic disturbances and are prone to abandonment of nest sites, especially in newly established territories. Typical construction activities (e.g., most ground-based equipment) could impact nesting behavior of bald eagle and golden eagle for up to approximately 0.5 mile. High-disturbance construction activities such as helicopter operations could impact nesting behavior of bald eagle and golden eagle for up to 1 mile from the location of the activity. Mitigation Measure Biology-10 requires bald eagle and golden eagle nest surveys when construction activities are scheduled to occur in or near bald eagle or golden eagle nesting habitat from January 1 to August 31 to determine if any eagle nests are active within a 1-mile radius. If nesting eagles are observed, a buffer of 1 mile would be established around the nest if in line of sight of construction activity and 0.5 mile if not in line of sight, to be determined with USFWS concurrence. Because Mitigation Measure Biology-10 includes procedures to avoid disturbance of a bald and golden eagle nest, including

avoidance buffers, the impact on bald and golden eagles from construction activities and associated disturbances would be less than significant.

Construction would also result in direct permanent and temporary loss of suitable foraging habitat for bald and golden eagles. While bald and golden eagles can nest in the existing transmission structures and trees along the alignment, the loss of habitat from removal of transmission structures and removal of trees from the wooded areas of the alignment would not significantly impact the species because there is surrounding natural nesting habitat that would not be affected by the Proposed Project. Temporary impacts on foraging habitat would not substantially impact this species because the impacts would be limited and dispersed along the Proposed Project alignment and unaffected foraging habitat surrounds the Proposed Project, which would remain available to golden eagles. Permanent impacts from the new subtransmission poles in suitable foraging habitat for bald and golden eagles would be offset by the removal of the existing subtransmission poles and towers/structures along the existing alignment. Impacts from habitat loss would, therefore, be less than significant.

The first full paragraph on Page 3.4-51 is revised as follows**:**

Swainson's hawk: A Swainson's hawk was observed foraging within the Proposed Project area. Swainson's hawks are particularly sensitive to changes in disturbance levels (e.g., new activity in a formerly undisturbed location) and are prone to abandonment of nest sites. Construction activities could impact nesting behavior of Swainson's hawk for up to 0.5 mile and could cause nest abandonment, which would be a significant impact absent mitigation. MM Biology-~~8~~ 11 requires that Swainson's hawk nest surveys be performed by a qualified biologist prior to construction and prohibits any new disturbances, habitat conversions, or other Project-related activities that may cause nest abandonment or forced fledging within 0.5 mile of an active nest between March 1 and July 31 ~~September 15~~, which is the Swainson's hawk breeding season in the Project area. Because MM Biology-11 specifies requirements for pre-construction surveys and avoidance of Swainson's hawk nests, impacts to Swainson's hawks

from construction activities and associated disturbances would be less than significant with mitigation

Mitigation Measure Biology - 11 on page MND-16 and 3.4-70 is revised as follows to incorporate the recommended protocol in response to this comment:

> Swainson's hawk nest surveys shall be performed by a CPUC-approved qualified biologist following the protocol in Swainson's Hawk Technical Advisory (2000) in areas of suitable habitat prior to construction activities scheduled to occur during the Swainson's hawk nesting season (from March 1-July 31).

2.5.5 Changes to Section 3.7, Geology and Soils

The first full paragraph on Page 3.7-46 is revised as follows:

> The Proposed Project would disturb more the 1 acre of land and would be required to comply with the Construction Stormwater General Permit (Order Number WQ 2022-0057-DWQ ~~2009-0009-DWQ~~), including preparation of a project-specific Stormwater Pollution Prevention Plan. The SWPPP developed for the Proposed Project would need to include BMPs to reduce the potential for erosion and address project-specific risk factors in compliance with Order Number WQ 2022-0057-DWQ ~~2009-0009-DWQ~~. The SWPPP would include measures such as silt fencing, straw waddles, geotextiles, and other BMPs to control sediment and erosion. The Construction General Permit also requires implementation of permanent BMPs including revegetation of areas of disturbance. Impacts would be less than significant due to compliance with the requirements of the Construction Stormwater General Permit. No mitigation is required.

2.5.6 Changes to Section 3.8, Greenhouse Gas Emission

The following Table 3.8-3 on Page 3.8-14 of Section 3.8, Greenhouse Gas Emissions, is revised as follows:

Table 2.5-4 Proposed Project GHG Emissions

Year/criteria	Estimated Annual CO2e Emissions (MT)
~~2024~~ 2027	533

Year/criteria	Estimated Annual CO2e Emissions (MT)
~~2025~~ 2028	2,227
~~2026~~ 2029	1,782
Total	4,543
30-year amortized	151
SJVAPCD	-
EKAPCD threshold	25,000
SCAQMD threshold	10,000
Thresholds exceeded?	No

Source: (SCE 2022)

Equipment efficiency would increase in the future due to regulatory requirements. The delay in construction would result in lower GHG emissions levels than those estimated in the IS/MND. As a result, the construction delay would not result in an increase in the severity of GHG impacts.

2.5.7 Changes to Section 3.13, Noise

Figures 3.13-1, Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 1 of 5), and Figure 3.13-3, Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 3 of 5) are corrected as follows:

Figure 3.13-1 Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 1 of 5)

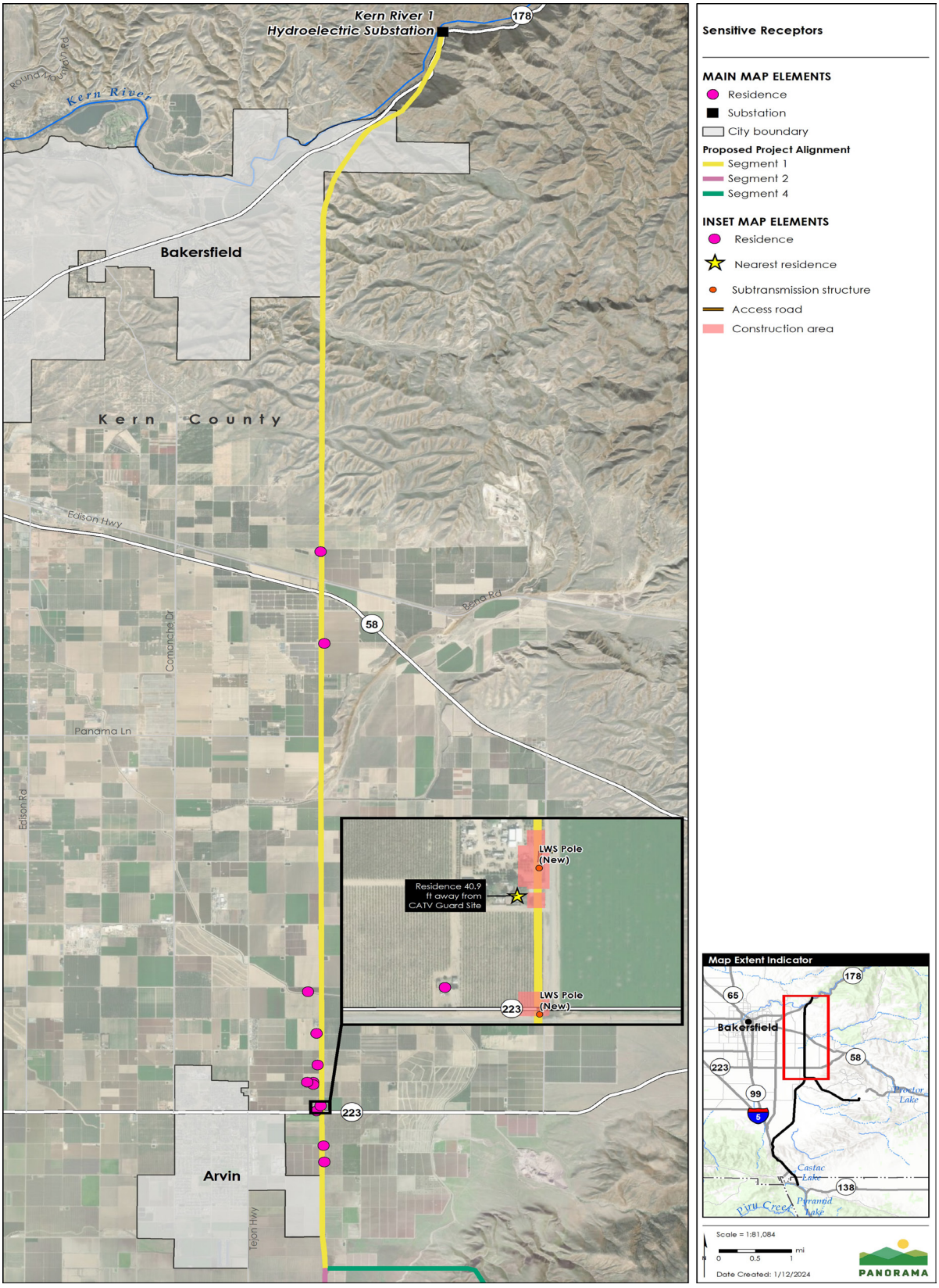
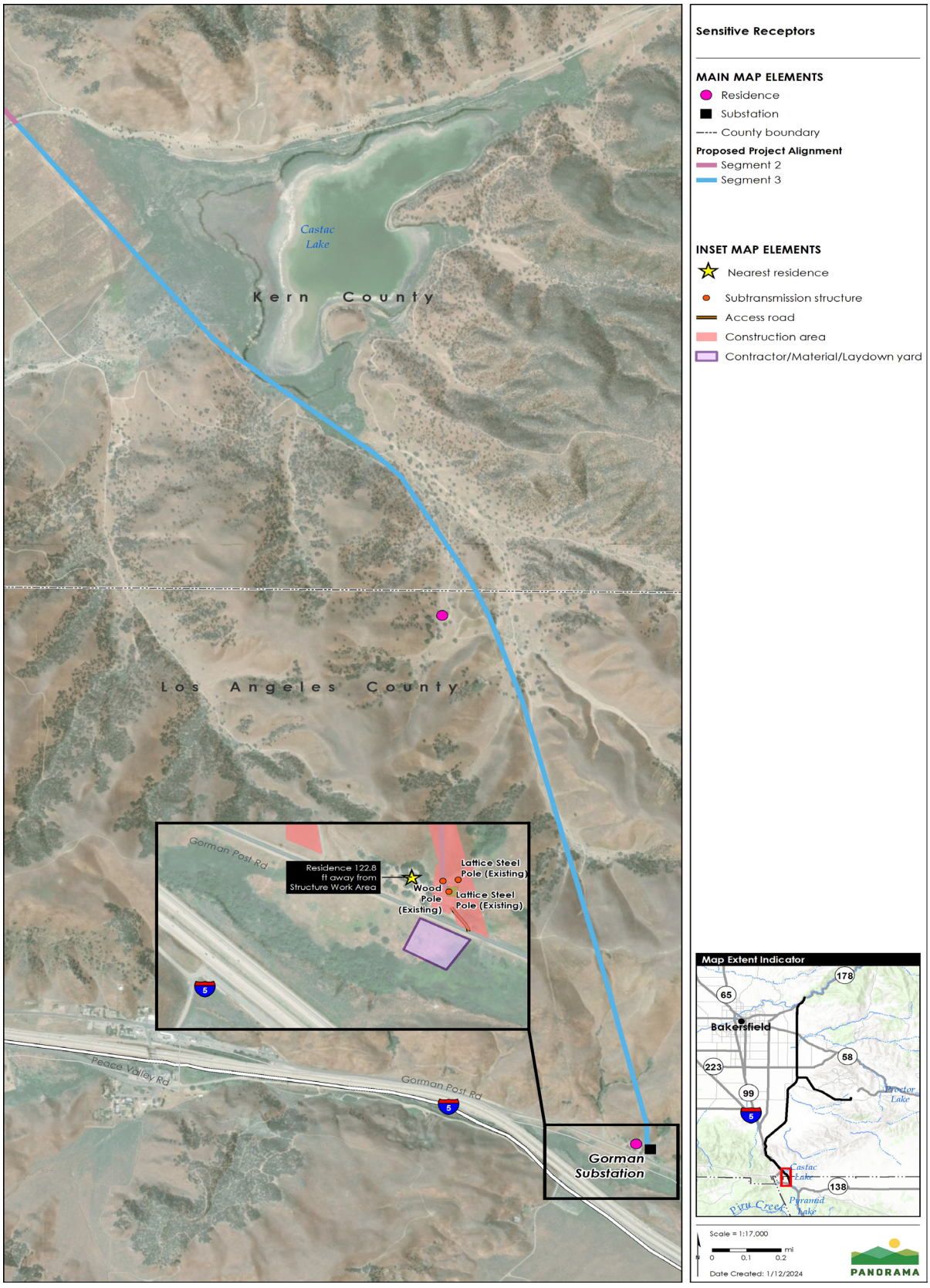


Figure 3.13-3 Nearest Residential Sensitive Receptor by Proposed Project Segment (Map 3 of 5)



2.5.8 Changes to Section 3.17, Transportation

The following Impact Discussion on Page 3.17-15 of Section 3.17, Transportation, is revised as follows:

> Project construction would generate additional vehicle travel on roadways from construction worker vehicles and truck trips associated with the delivery of equipment and materials and removal of excavated material and waste. Construction activities would include the movement of light, medium, and heavy-duty vehicles along I-5, state routes, and county- and city-maintained roadways. Project-related vehicles and equipment would generally travel from staging areas or contractor yards to work sites daily. Construction is scheduled to begin in May 2027 ~~June 2026~~ and last approximately 26 ~~23~~ months. Construction would generate approximately 250 vehicle trips per day. Applicable policies and plans regarding vehicle trips and roadway circulation are presented in Table 3.17-7. During peak construction, vehicles would be dispersed through the regional road network because access to each work area would be provided from different access roads. Therefore, the short-term additional vehicle trips generated by construction activities would not be significant. Temporary closure of traffic lanes or roads would be required during installation or removal of structures located adjacent roadways and installation of overhead wire. Temporary lane and road closures could affect motor vehicle circulation during construction activities. APM TRA-1 requires the implementation of traffic control measures and a traffic control plan in accordance with the California Manual on Uniform Traffic Control Devices (CA MUTCD) and the California Temporary Traffic Control Handbook (CATTCH) (California Inter-Utility Coordinating Committee 2018). Implementation of traffic control measures would minimize disruptions to the road network during construction. As analyzed in Table 3.17-7, the Proposed Project would not conflict with policies for safe and efficient streets. The impact would be less than significant. No mitigation is required.

2.5.9 Changes to Section 4, MMRP

The sixth paragraph under 4.3 Roles and Responsibilities on page 4-4 is revised as follows:

MPRs would be strictly limited to minor project changes that do not trigger additional permit requirements unless the appropriate agency has approved the change, do not increase the severity of an impact to a significant level or create a new significant impact that cannot be mitigated by existing mitigation measures, and are within the geographic scope of the MND

Mitigation Measure Biology-10 on page MND-16, 3.4-69 and Table 4.1-1 on page 4-43 is revised as follows:

Mitigation Measure Biology 10: Bald Eagle and Golden Eagle Avoidance and Minimization

Avoid and minimize impacts. All project activities located within areas identified as bald eagle or golden eagle habitat (as described in the TLRR Habitat and Sensitive Species Report for the GKR Project) shall implement the following avoidance and minimization measures.

- Bald eagle and golden eagle nest surveys will be performed when construction activities are scheduled to occur in or near bald eagle or golden eagle nesting habitat from January 1-August 31 to determine if any eagle nests are active within a 1-mile radius. Ground-based or helicopter-based survey methods will be developed in coordination with USFWS and will be consistent with current USFWS and CDFW survey guidelines, or as recommended by USFWS and CDFW. Surveys shall be conducted one season prior to Project implementation following CDFW Bald Eagle Survey Instructions Protocol and USFWS Protocol for the Interim Golden Eagle Inventory and Monitoring Protocol.
- For construction activity, should an active bald eagle or golden eagle nests be present, the nest shall receive a 1-mile buffer if in line of sight, 0.5-mile buffer if no line of sight—with USFWS concurrence.
- Buffers and buffer modifications for bald and golden eagles will be addressed in the Project Nesting Bird Management Plan (Mitigation Measure Biology-8).

Applicable locations: Activities within 1 mile of a bald eagle or golden eagle nest.

Performance standards and timing:

- **Before construction:** N/A Conduct surveys for bald eagle and golden eagle following USFWS and CDFW protocols the survey season immediately prior to Project activities.
- **During construction**: SCE conducts a nesting survey for all activities within 1 mile of suitable habitat for bald eagle and golden eagle in the period January

1 to August 31. Nest buffers shall be implemented per the measure and USFWS requirements.

- **After construction:** N/A.

Mitigation Measure Biology-11 on Table 4.1-1 on page 4-44 is revised as follows to incorporate the recommended protocol in response to this comment:

> Swainson's hawk nest surveys shall be performed by a CPUC-approved qualified biologist following the protocol in Swainson's Hawk Technical Advisory (2000) in areas of suitable habitat prior to construction activities scheduled to occur during the Swainson's hawk nesting season (from March 1 ~~September 15~~ July 31).

MM Biology-12 on page MND-17, 3.4-70 and Table 4.1-1 on page 4-45 is revised in response to this comment as follows:

> A qualified biologist shall conduct a pre-construction survey for active American badger dens within ~~7~~ one day~~s~~ prior to grading or vegetation clearing in work areas, or use of overland access routes.

and

> SCE shall obtain any required permits and/or consult with CDFW prior to implementing any den exclusions.

MM Biology-15 on page MND-19, 3.4-73 and Table 4.1-1 on page 4-49 is revised in response to this comment as follows:

> Construction Monitoring. If a colonial or solitary maternity roost was located, tree/structure removal will be avoided between April 15 and August 15 (the maternity period) to avoid impacts to active maternity roosts (reproductively active females and dependent young). If bats are present, but no dependent young bats are present within the structure for removal, an eviction plan shall be prepared by a qualified biologist and submitted to CPUC and CDFW for review. A ~~qualified biologist will determine the appropriate~~ 100-foot no disturbance buffer ~~area~~ around active roost ~~nest(s)~~ and monitoring of the no-disturbance buffer by a qualified biologist will be provided ~~provisions for buffer exclusion areas~~. Unless restricted by the qualified biologist, construction vehicles will be

allowed to move through a buffer area with no stopping or idling. The qualified biologist will determine, evaluate, and modify buffers as appropriate based on species tolerance and behavior in consultation with CDFW, the potential disruptiveness of construction activities, and existing conditions. Furthermore, the roost will be monitored to determine activity. Roost monitoring will be conducted by qualified biological monitors with knowledge of bat behavior under the direction of a CDFW qualified bat biologist. The qualified biological monitor will observe and document implementation of appropriate buffer areas around active roost(s) during project activities.

Applicant Proposed Measure CUL-2 on page 2-63, page 3.18-10 and Table 4.1-1 on page 4-54 is revised as follows:

Avoid Environmentally Sensitive Areas (ESA). SCE will perform cultural resource surveys for any portion of the proposed project APE/API not yet surveyed (e.g., new or modified staging areas, pull sites, or other work areas). Cultural resources discovered during surveys will be subject to MM~~APM~~ CUL-1 (Develop CRMP).

Mitigation Measure CUL-1 on page MND-22, 3.5-18 and Table 4.1-1 on page 4-57 is revised for clarity as follows:

Mitigation Measure CUL-1. Cultural Resources Management Plan: The CRMP will define and map all known NRHP- and CRHR-eligible properties in or within 100 feet (30.5 meters) of the proposed project APE/API. A cultural resources protection plan will be included that details how NRHP- and CRHR-eligible properties will be avoided and protected during construction. Avoidance and preservation of eligible properties ~~the resources~~ in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context is the preferred method of mitigation and shall be implemented wherever feasible. Measures will include, at a minimum, designation and marking of Environmentally Sensitive Areas (ESAs), archaeological monitoring, personnel training, and reporting. The plan will also detail which avoidance measures will be used, where and when they will be implemented, and how avoidance measures and enforcement of ESAs will be coordinated with construction personnel.

Mitigation Measure GEO-1 on page MND-23, 3.7-44 and Table 4.1-1 on page 4-60 is revised for clarity as follows:

> Disturbed (due to grading or construction) and engineered slopes shall be monitored by qualified construction personnel on an occasional basis (bi-monthly or as needed) until the slope is fully stabilized and no longer poses an increased risk of failure or erosion as compared to similar undisturbed slopes in the immediate vicinity

Applicant Proposed Measure HAZ-3 on page 2-66, page 3.4-41, page 3.9-17, page 3.15-44 and Table 4.1-1 on page 4-65 is revised as follows:

> The Project-specific Fire Prevention and Emergency Response Plan for construction of the project will be prepared by SCE and submitted to CPUC, CALFIRE~~, Inyo,~~ Kern and Los Angeles ~~San Bernardino~~ counties, and local municipal fire agencies for review at least 30 days prior to initiation of construction. SCE will address all comments received from reviewing agencies and provide the final Fire Prevention and Emergency Response Plan to reviewing agencies for approval prior to initiating construction activities.

Mitigation Measure TRI-1 on page MND-27, 3.18-14 and Table 4.1-1 on page 4-72 is revised as follows:

> Interested Tribes shall be invited to conduct Native American monitoring during all ground-disturbing activities associated with portions of or the entirety of Segment 3 of the project as outlined in the CRMP. The CRMP shall outline a monitoring program and establish when monitoring is needed and when monitoring can cease based on findings during monitoring. The CRMP shall be provided to Native Americans for review and comment for 30 days. A Native American monitor shall be invited to be onsite daily to coordinate with the archaeological monitors and to provide tribal perspectives in the event a discovery occurs. The Native American monitor shall be free to visit different activity areas throughout the course of a given day, notwithstanding any limitations based on safety concerns

Applicant Proposed Measure TCR-2 on page 2-67, page 3.18-11 and Table 4.1-1 on page 4-72 is revised as follows:

> A tribal engagement plan shall be prepared, which will detail how Native American tribes will be engaged and informed throughout the proposed project. The tribal engagement plan will be included in the CRMP (Mitigation Measure ~~APM~~ CUL-1).

2.5.10 Changes to Appendices

The following Appendix D-13 is added:

TECHNICAL MEMORANDUM

To: Shelleena Pernot - ICF

From: Paul Rosebush - MESA Biological, LLC

Date: February 24, 2025

SUBJECT: **SCE GORMAN KERN RIVER OVERHEAD POWER TRANSMISSION LINE REPLACEMENT PROJECT – SOUTHERN RUBBER BOA DESKTOP ANALYSIS**

This technical memorandum provides a desktop analysis evaluating the potential occurrence of the southern rubber boa (*Charina umbratica*) within the Southern California Edison (SCE) Gorman to Kern River Overhead Power Transmission Line Replacement Project in Kern County, California (Project).

Desktop Analysis Methodology

To assess the potential occurrence of the southern rubber boa, a desktop analysis was conducted using multiple techniques. A comprehensive review was performed of existing scientific studies, agency reports, and occurrence records of the southern rubber boa from sources including the California Natural Diversity Database (CNDDB 2025), Jennings and Hayes (1994), Stebbins (2003), and Zweifel (1952). This review helped establish the species' known range, habitat associations, and documented occurrences.

In addition, topographic and land cover analyses were conducted using U.S. Geological Survey National Land Cover Database (2025) aerial imagery to identify key habitat features such as forested areas and rocky outcrops. Aerial photographs provided insight into potential microhabitats, vegetation continuity, and landscape connectivity. Lastly, proximity to known occurrences was evaluated to determine the likelihood of the species' presence in the project area, and factors such as range expansion and habitat connectivity were considered. These desktop techniques were implemented to develop an initial assessment of habitat suitability and identify the need for species presence/absence field surveys.

Habitat Preferences of the Southern Rubber Boa

The southern rubber boa primarily inhabits higher elevation forested woodlands that provide necessary environmental conditions for its survival. These habitats are typically composed of mixed coniferous and oak woodlands, where a dense canopy helps maintain cooler temperatures and higher humidity levels, creating a stable microclimate favorable to the species. The forest

floor in these high-elevation areas is often covered with a thick layer of leaf litter, fallen logs, and rock outcrops, which offer crucial shelter for thermoregulation, moisture retention, and protection from predators.

Additionally, loose, well-drained soils in these environments facilitate the boa's fossorial behavior, allowing it to burrow and evade extreme surface conditions. Moisture availability, often from seasonal snowmelt, rainfall, or shaded riparian areas, further enhances habitat suitability by preventing desiccation. These combined characteristics make high-elevation forested woodlands ideal for the southern rubber boa, supporting its survival and reproductive needs while limiting its distribution to specific mountainous regions.

Geographic Distribution and Elevation Considerations

The southern rubber boa is predominantly found in the San Bernardino and San Jacinto Mountains of Southern California at elevations ranging from 5,050 to 8,070 feet. Some populations have also been observed in the Tehachapi and San Emigdio Mountains, where they co-occur with the northern rubber boa (*Charina bottae*), creating an area of overlap due to historical gene flow.

Within these mountain ranges, these boas are typically found in forested areas at elevations between 6,500 and 8,000 feet, including locations such as Frazier, Tecuya, and Antimony Peaks, Mount Pinos west to Cerro Noroeste, and Alamo Mountain. These peak elevations provide the necessary environmental conditions for the species, including suitable microhabitat features and sustained moisture levels.

Project Area Suitability Assessment

Recorded occurrences of the southern rubber boa in the CNDDB indicate that the species is primarily found at higher elevations within the San Emigdio, Tehachapi, and Greenhorn Mountain ranges surrounding the project site (Attachment A – CNDDB Southern Rubber Boa Map). However, the elevations along the Gorman to Kern River corridors, including Stallion Springs at approximately 4,100 feet and the Gorman area at around 4,500 feet, lack the necessary microhabitat characteristics required for the species' presence.

Key microhabitat components essential for the southern rubber boa include loose, moist soils for burrowing, ample surface cover such as rocks, logs, and leaf litter for thermoregulation and shelter, and a stable prey base consisting of small mammals and lizards. This species is closely associated with mesic environments, including riparian corridors and shaded woodlands, which help maintain the cool, humid conditions it requires. However, at the highest elevations of the project site, hotter temperatures prevent sustained soil moisture, creating drier conditions less suitable for the species. The relative lack of these critical microhabitat features in both the high-elevation areas of Stallion Springs and the Gorman region suggests that these locations are not ideal for supporting southern rubber boa populations.

Conclusion

Based on this desktop analysis, the potential for the southern rubber boa to occur within the project area is presumed low due to the absence of key microhabitat features and the elevation limitations. While the species is known to inhabit higher-elevation forested woodlands in the

Tehachapi and San Emigdio Mountains, the project area lacks the necessary moisture retention, soil composition, and cover elements essential for its survival. Additionally, the hot climate at these elevations further reduces habitat suitability by limiting moisture availability, which is a critical factor for the species' thermoregulation and burrowing behavior.

Although current data suggests that the project area does not provide optimal conditions for the southern rubber boa, SCE will have a biological monitor on-site while all construction activities take place. In the unlikely event that a southern rubber boa is encountered during construction, all activities will be put on hold until the snake moves out of the work area on its own. If it's determined that take is unavoidable during construction, SCE will request consultation with CDFW and obtain the necessary state permits and/or submit plans to avoid any impacts to this species.

References

California Department of Fish and Wildlife. California Natural Diversity Database (CNDDB). Accessed 2025.

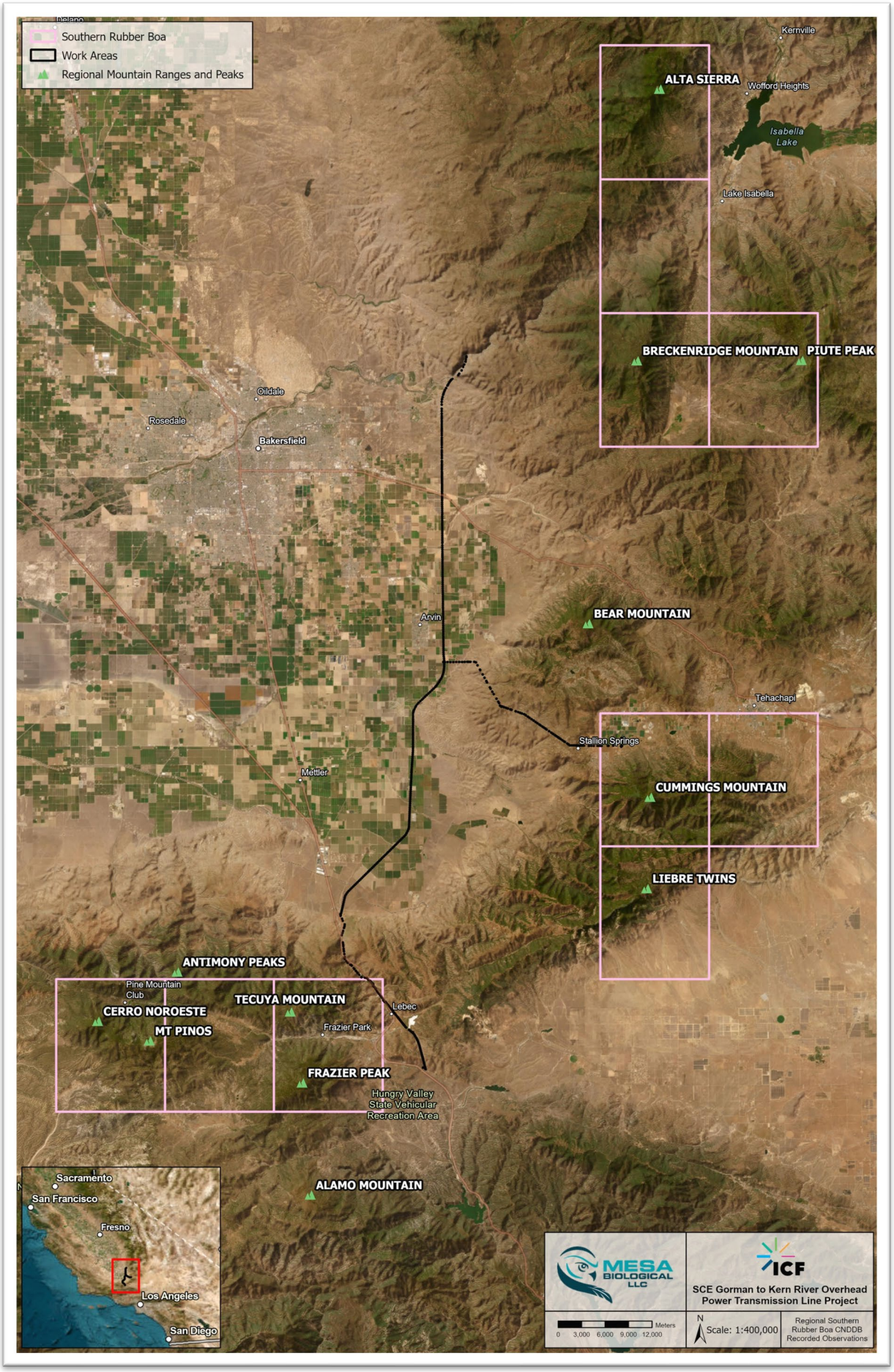
Jennings, M.R., & Hayes, M.P. (1994). Amphibian and reptile species of special concern in California. California Department of Fish and Game, Sacramento, CA.

Stebbins, R.C. (2003). *A Field Guide to Western Reptiles and Amphibians*. 3rd Edition. Houghton Mifflin Harcourt, Boston, MA.

U.S. Geological Survey. National Land Cover Database. Accessed 2025.

Zweifel, R.G. (1952). Pattern variation and evolution of the rubber boa, *Charina*. Copeia, 1952(3), 152-159.

Attachment A – Regional CNDDB Southern Rubber Boa Observations Map


Southern Rubber Boa
Work Areas
Regional Mountain Ranges and Peaks
Kernville
ALTA SIERRA
Wofford Heights
Isabella Lake
Lake Isabella
BRECKENRIDGE MOUNTAIN
PIUTE PEAK
Oildale
Rosedale
Bakersfield
Arvin
BEAR MOUNTAIN
Tehachapi
Stallion Springs
Mettler
CUMMINGS MOUNTAIN
LIEBRE TWINS
ANTIMONY PEAKS
Pine Mountain Club
CERRO NOROESTE
MT PINOS
TECUYA MOUNTAIN
Lebec
Frazier Park
FRAZIER PEAK
Hungry Valley State Vehicular Recreation Area
ALAMO MOUNTAIN
Sacramento
San Francisco
Fresno
Los Angeles
San Diego
MESA BIOLOGICAL LLC
ICF
SCE Gorman to Kern River Overhead Power Transmission Line Project
Meters
0 3,000 6,000 9,000 12,000
N
Scale: 1:400,000
Regional Southern Rubber Boa CNDDB Recorded Observations

3 Mitigation Monitoring and Reporting Plan

3.1 Summary of Revisions to the MMCRP

This chapter includes an updated version of Draft IS/MND Table 4.1-1, Mitigation Monitoring and Reporting Program for the Project. The purpose of the updated table in this chapter is to provide a single comprehensive list of impacts, mitigation measures, Applicant Proposed Measures (APMs), monitoring and reporting requirements, and timing of implementation. Therefore, the text revisions and additions to impacts, mitigation measures, and APMs that are shown in Chapter 2 of this Final MND are shown in final form in this chapter and not depicted in underline and strike out format. Following review of public comments received during the public review period, the CPUC has determined that no new significant environmental impacts are identified in this Final MND. Additionally, no mitigation measures presented in the Draft IS/MND were deleted in this Final MND.

Table 3-1 Mitigation Monitoring and Reporting Program

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
AGRICULTURE AND FORESTRY RESOURCES		
Mitigation Measure Agriculture – 1: Farmland Construction Impact Mitigation SCE shall implement the following measures for temporarily disturbed Farmland: • The applicant shall photo or video document the conditions of temporary work pads within Farmland (i.e, meeting the definition of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as defined by the Farmland Mapping and Monitoring Program of the California Resources Agency) prior to construction to define the existing conditions of the Farmland areas. • The applicant shall return all temporary disturbance areas in Farmlands to pre-construction conditions after the completion of construction.The applicant shall photo or video document the post-construction condition to verify it matches pre-construction conditions. • In areas containing crops or irrigation infrastructure used to maintain crops that must be removed to gain access to temporary work areas for construction purposes, SCE will provide compensation to farmers and/or landowners for replacement of the removed crops and/or irrigation infrastructure. • If topsoil is removed from an area to accommodate temporary construction activities, it shall be restored to preconstruction conditions within two months of the completion of construction.	Within construction areas located in Farmland as defined by the FMMP	**Before construction**: Document the pre-construction condition of temporary disturbance area within Farmlands with photos or video. **During construction:** N/A **After construction:** Restore all temporary disturbance areas to pre-construction conditions after the completion of construction and compensate farmers and/or landowners for replacement of the removed crops and/or irrigation infrastructure.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
AIR QUALITY		
APM AIR-1: Tier 4 Construction Equipment. All construction equipment with rating between 100 and 750 horsepower (hp) will be required to use engines compliant with EPA Tier 4 non-road engine standards. In the event a Tier 4 engine is not available for any off-road construction equipment with rating at or higher than 100 hp, that documentation of the unavailability will be provided.	All Project areas	**Before Construction:** Determine availability of equipment and provide documentation if Tier 4 is not available. **During Construction:** N/A **After Construction**: N/A
BIOLOGICAL RESOURCES		
APM BIO-HERP-5: Tehachapi Slender Salamander **Pre-construction survey/Construction monitoring.** Prior to initial ground-disturbing activities, a qualified Tehachapi Slender Salamander (TSS) biologist will conduct focused surveys within areas identified as habitat for this species. Biological monitors shall monitor construction activities impacting areas identified as occupied or potentially occupied TSS habitat. If TSS are observed and relocation is required, SCE will obtain the necessary permits or authorizations to relocate salamander individuals to the closest habitat area containing talus, as required by California Department of Fish and Wildlife (CDFW) in applicable permits or habitat conservation plans. **Avoid and minimize impacts**. All project activities located within areas identified as TSS habitat shall implement the following avoidance and minimization measures: • Limited Operating Period. If occupied habitat is identified, no construction activities will occur during the TSS active period without coordination with CDFW, February through April, in work areas impacting TSS occupied habitat	Tehachapi slender salamander habitat	**Before Construction:** SCE provides CPUC with any agency permits or authorizations; a pre-construction clearance survey is performed. **During Construction:** SCE implements avoidance and minimization measures. **After Construction:** N/A

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• Project activities occurring in habitat located within oak woodlands and ravines shall avoid displacing rocks, logs, bark, and other debris in thick leaf litter, near talus slopes. Trapped Animal Prevention. All auger holes, trenches, pits, or other steep-sided excavations that may pose a hazard toTSS will be either constructed with escape ramps (earthen or wooden) or securely covered when unattended to prevent entrapment. At the start and end of each workday, and just before backfilling, all excavations will be inspected for trapped animals. If found, trapped animals will be removed by the qualified biologist and relocated to outside the Project footprint, as required in all applicable permits or habitat conservation plans.		
APM BIO-MAM-2: San Joaquin kit fox **Pre-construction survey/Construction monitoring.** Within 30 days prior to initial ground-disturbing activities, a qualified biologist will conduct surveys within areas identified as habitat for San Joaquin kit fox. Known and potential dens shall be monitored for evidence of kit fox use by placing an inert tracking medium or an infra-red beam camera at the entrance and monitoring for at least five consecutive nights. A qualified biologist will monitor construction activities within occupied kit fox habitat. If SJKF occupancy is determined at a given site during pre-construction surveys, SCE will follow all take permit conditions and resource management plan requirements to address SJKF; USFWS and CDFW will be consulted prior to conducting work as required by the permits **Agency consultation and den avoidance** If there are known or potential SJKF dens within project impact areas or project activities within den exclusion zone distances, CDFW and U.S. Fish and Wildlife Service (USFWS) will be consulted to ensure project activities will not impact the species.	San Joaquin kit fox habitat	**Before Construction:** SCE provides CPUC with any agency permits or authorizations; a pre-construction clearance survey is performed. **During Construction:** Monitoring construction activities within occupied habitat; SCE implements avoidance and minimization measures. **After Construction:** N/A

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The following exclusion zones will be established for SJKF dens in accordance with the 2011 USFWS Standardized Recommendations for Protection of the San Joaquin Kit Fox: • Potential and atypical dens. An exclusion zone with a minimum radius of 50 feet as measured outward from the entrance or cluster of entrances will be maintained. Potential dens include any hole of any appropriate size for SJKF. Atypical dens may include any man-made structure, pipes, culverts, and similar structures with a diameter of approximately 4-inches or greater. • Known/occupied dens. An exclusion zone with a minimum radius of 100 feet as measured outward from the entrance or cluster of entrances will be maintained. • Natal/pupping dens. If a den is identified as known/occupied during the breeding season (February through September), the den will be demarcated with a 200-foot buffer. • Actions within exclusion zones will be limited to essential vehicle and equipment travel on authorized roads and foot traffic and will be monitored by a qualified biologist. No modification to existing occupied or natal dens can occur without authorization from USFWS and/or CDFW and in accordance with the 2011 USFWS Standardized Recommendations for Protection of the San Joaquin Kit Fox. Natal/pupping dens will not be destroyed until the pups and adults have vacated. If a den can be avoided by construction, but the exclusion zone can't be, then the den can have a one-way door installed or the entrance plugged once confirmed not to be occupied; one-way doors will be removed at the end of construction. If a den cannot be avoided by construction, the den might be able to be removed but may require additional mitigation, such as the creation of artificial dens. Dens in which		

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no activity was detected may be closed by a qualified biologist following agency guidelines. **Avoid and minimize impacts.** The following avoidance and minimization measures shall be implemented for all project activities located within areas identified as SJKF habitat: • Limited Operating Period. Within occupied SJKF areas, SCE shall restrict work to daylight hours, except during an emergency, in order to avoid nighttime activities when kit fox may be present on access roads. • Disposal of Trash. Trash and food items will be contained in closed containers and removed daily to reduce attractiveness to opportunistic predators. • Pets Prohibited. Employees will not bring pets or other animals to the GKR Project area, unless the animal is ADA compliant. • Vehicle Travel. During construction-related activities, motor vehicles will be limited to maintained roads, designated routes, and areas identified as being permanently or temporarily affected by construction within the Project footprint. Motor vehicle speeds along Project routes and access roads within areas identified as habitat for SJKF will not exceed 20 miles per hour. • Trapped Animal Prevention. All auger holes, trenches, pits, or other steep-sided excavations that may pose a hazard to SJKF will be either constructed with escape ramps (earthen or wooden) or securely covered when unattended to prevent entrapping SJKF. At the start and end of each workday, and just before backfilling, all excavations will be inspected for trapped animals. Any SJKF found will be allowed to escape unimpeded. If a SJKF is trapped and does not leave on its own, a qualified biologist will move the animal according to agency authorizations, if there is no agency authorization, the fox shall not be		

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moved (unless in imminent danger) until the USFWS and/or CDFW has been contacted and further guidance has been received. • Cover Construction Materials. All construction pipes, culverts, or similar structures with a diameter of approximately four (4) inches or greater that are stored for one or more overnight periods will be thoroughly inspected for SJKF before the pipe is subsequently buried, capped, otherwise used or moved in any way. Likewise, all construction equipment with the potential to entrap SJKF (e.g., water buffalos, barrels, bins) will be covered or secured by turning over or tipping on their side to prevent trapping SJKF. All water tanks and containers will have tight fitting lids and will be checked to ensure the lids are closed and properly secured. Any SJKF found will be allowed to escape unimpeded. If a SJKF is trapped and does not leave on its own, a qualified biologist will move the animal according to agency authorizations, if there is no agency authorization, the fox shall not be moved (unless in imminent danger) until the USFWS and/or CDFW has been contacted and further guidance has been received.		
APM BIO-RES-2: Develop Invasive Plant Management Plan. SCE shall prepare and implement an Invasive Plant Management Plan (IPMP).This plan shall include measures designed to avoid the introduction and spread of new nonnative invasive plant species (invasive plants) and minimize the spread of existing invasive plants resulting from project activities.The IPMP shall be submitted to the CPUC and for review and approval prior to the start of construction. For the purpose of the IPMP, invasive plants shall include plants that (1) are invasive and rated high or moderate for negative ecological impact in the California Invasive Plant Inventory Database (Cal-IPC, 2006), or (2) aid and promote the spread of wildfires (such as Bromus tectorum (cheatgrass), Brassica tournefortii (Sahara mustard), and Bromus madritensis spp.	Entire Project area	**Before Construction:** SCE prepares invasive plant management plan and conducts pre-construction inventory and treatment. **During Construction:** Prevention measures and monitoring **After Construction:** Surveying and monitoring for invasive plant infestation

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Rubens (red brome)) or (3) identified by USFS as special concern.The IPMP will be implemented throughout project pre-construction, construction, and restoration phases. **Invasive Plant Management Plan** The IPMP will include the information defined in the following sections: **Assessment.** An assessment of the GKR Project's potential to cause spread or introduction of invasive plants into new areas, or to introduce new invasive plants into the ROW.This section will list known and potential invasive plants occurring on the ROW and in the project region and identify threat rankings and potential for project-related occurrence or spread for each species.This section will identify control goals (e.g., eradication, suppression, or containment) for invasive plants of concern with potential to occur on the ROW. **Pre-construction invasive plant inventory.** SCE shall inventory of all invasive plants of concern in areas (both within and outside the ROW) subject to project-related vegetation removal/disturbance, overland travel (drive and crush), and ground-disturbing activity.The invasive plants inventory area shall also include vehicle and equipment access routes within the ROW and all project staging and storage yards. Invasive plants of concern shall be mapped by area of occurrence and percent cover.The map will be updated with new occurrences at least once a year. **Pre-construction invasive plants treatment.** Invasive plant infestations identified in the pre-construction invasive plants inventory shall be evaluated to identify potential for project-related spread and potential benefits (if any) of pre-construction treatment. Pre-construction treatment will consider the specific invasive plants, potential seed banks, or other issues.The IPMP will identify any infestations to be controlled or eradicated prior to project construction. Control and follow-up monitoring		

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of pre-construction invasive plants treatment sites will follow methods identified in appropriate sections of the IPMP. **Prevention.** The IPMP will specify methods to minimize potential transport of new invasive plant seeds onto the ROW, or from one section of the ROW to another. The ROW may be divided into "weed zones," based on invasive plants of concern in the ROW. The IPMP will specify inspection procedures for construction equipment entering the GKR Project area. Vehicles and equipment may be inspected and cleaned at entry points to specified sections of the ROW, and before leaving work sites where invasive plants of concern must be contained locally. Construction equipment shall be inspected to ensure it is free of any dirt or mud that could contain invasive plant seeds, roots, or rhizomes, and the tracks, outriggers, tires, and undercarriage will be carefully washed, with special attention being paid to axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Other construction vehicles (e.g., pick-up trucks) that will be frequently entering and exiting the site will be inspected and washed on an as-needed basis. Tools such as chainsaws, hand clippers, pruners, etc., shall be cleaned of dirt and mud before entering project work areas. All vehicles will be washed off-site when possible. If off-site washing is infeasible, on-site cleaning stations (including air washing) will be set up at specified locations to clean equipment before it enters the work area. Wash stations will be located away from native habitat or special-status species occurrences. Wastewater from cleaning stations will not be allowed to run off the cleaning station site. When vehicles and equipment are washed, a daily log must be kept stating the location, date and time, types of equipment, methods used, and personnel present. The log shall contain the signature of the responsible crewmember. Written or electronic logs shall be available to CPUC monitors on request.		

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Erosion control materials (e.g., straw bales) must be certified free of invasive plant seed ("weed-free") before they are brought onto the site. The IPMP must prohibit on-site storage or disposal of mulch or green waste that may contain invasive plant material. Mulch or green waste will be removed from the site in a covered vehicle to prevent seed dispersal and transported to a licensed landfill or composting facility. The IPMP will specify guidelines for any soil, gravel, mulch, or fill material to be imported into the GKR Project area, transported from site to site within the GKR Project area, or transported from the GKR Project area to an off-site location, to prevent the introduction or spread of invasive plants to or from the GKR Project area. **Monitoring.**The IPMP shall specify methods to survey for invasive plants of concern during pre-construction, construction, and restoration phases; and shall specify qualifications of specialists responsible for invasive plant monitoring and identification. It must include a monitoring schedule to ensure timely detection and immediate control of new invasive plant infestations to prevent further spread. Surveying and monitoring for invasive plant infestations shall occur at least two times per year, to coincide with the early detection period for early season and late season invasive plants.The monitoring section shall also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control. **Control.**The IPMP must specify manual and chemical invasive plant control methods to be employed.The IPMP shall include only invasive plant control measures with a demonstrated record of success for target invasive plants, based on the best available information.The plan shall describe proposed methods for promptly scheduling and implementing control activity when any project-related invasive plant infestation is located (e.g., located on a project disturbance site), to ensure effective and timely		

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invasive plant control. Invasive plant infestations must be controlled or eradicated as soon as possible upon discovery, and before they go to seed, or when appropriate with the goal to prevent further spread. All proposed invasive plant control methods must minimize disturbance to native vegetation, limit ingress and egress to defined routes, and avoid damage to any environmentally sensitive areas (ESAs) identified within or adjacent to the ROW. New infestations by invasive plants of concern will be treated at a minimum of once annually until eradication, suppression, or containment goals are met. Invasive plant occurrences can be considered eradicated when no new seedlings or resprouts are observed for three consecutive years, or a single season where new seedlings or resprouts are observed in reference populations but not at the control site. Invasive plant control efforts may cease when eradication is complete. Manual control shall specify well-timed removal of invasive plants or their seed heads with hand tools; seed heads and plants must be disposed of in accordance with guidelines from the relevant County Agricultural Commissioners, if such guidelines are available. The focus of weed abatement will be manual control. Chemical controls will be avoided. If chemical controls are indicated for specific invasive species, the following guidelines shall be followed. The chemical control section must include specific and detailed plans for any herbicide use. It must indicate where herbicides will be used, which herbicides will be used, and specify techniques to be used to avoid drift or residual toxicity to native vegetation or special-status plants, consistent with the National Invasive Species Management Plan (NISC, 2008). All herbicide applications will follow U.S. Environmental Protection Agency label instructions and will be in accordance with federal, state, and local laws and regulations. Only state-approved herbicides may be used. Herbicide treatment will be implemented by a Licensed Qualified		

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Applicator. Herbicides shall be applied in accordance with product labels and applicator licenses. Herbicides shall not be applied during or within 24 hours of high confidence predicted rain. Only water-safe herbicides shall be used in riparian areas or within channels (engineered or not) where they could run off into downstream areas. Herbicides shall not be applied in high wind conditions. **Reporting schedule and contents**. The IPMP shall specify reporting schedule and contents of each report.		
Mitigation Measure Biology-1: Avoidance and Minimization of Impacts on Special-Status Plants SCE shall avoid, minimize or mitigate impacts on any state or federally listed or California Rare Plant Rank (CRPR) 1 or 2 plants that may be located on the project disturbance areas or surrounding buffer areas. This shall include known occurrences of Bakersfield cactus, Kern mallow, calico monkeyflower and Piute mountains navarretia, as well as new species or populations discovered during pre-construction surveys. **Pre-Construction Surveys.** SCE shall obtain CPUC approval of a qualified botanist to perform pre-construction surveys for state or federally listed plant species and those with a California Rare Plant Rank (CRPR) of 1A, 1B, 2A, or 2B that have the potential to occur in the area. These surveys shall be performed utilizing CNPS or other accepted botanical survey protocol. Special-status plant surveys shall be conducted during the appropriate blooming period for each species and prior to construction activities for all work areas occurring off existing access roads in natural areas, including overland travel routes, and areas of existing roads that require modifications. The surveys shall include a floristic inventory and focused search for special-status plants with potential to occur in Project areas	All special-status plant populations within 25 feet of a work area and 20 feet of an access road, and anywhere activities will occur off existing access roads in natural areas for other special-status plants	**Before construction:** (1) Special-status plant surveys are conducted during the appropriate blooming period for each species; (2) A survey report is submitted to the CPUC no less than 30 days before construction, including maps; (3) If an impact to a special-status plant cannot be avoided, a Salvage and Replanting strategy that would be part of the Habitat Restoration Plan is submitted to the CPUC for approval and appropriate permit authorization from CDFW and/or USWFS is obtained; (4) Plant-salvage and/or seed-collection procedures are implemented; and (5) Special-status plant populations are flagged for avoidance. Compensation is documented for any special-status species where habitat compensation is the appropriate form of mitigation. **During construction:** (1) Special-status plants are avoided and monitored appropriately, and (2) Salvaged plants and seed are stored and monitored appropriately.

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where suitable habitat is present. Special-status plant survey(s) shall be conducted within 1 year of construction mobilization. The survey results shall be summarized in a report and provided to the CPUC no less than 30 days prior to commencement of construction.The survey report shall identify the botanists' names and qualifications, and a description of the survey dates, methods, and a description of the survey efforts, including a list of the species that were searched for, results of the plant inventory evaluation, and suitable habitat that was encountered.The report shall include maps (1: 3,000 scale) that identify final Project work areas and access routes and the extent of focused plant surveys that cover Project areas located in occupied habitat. Maps in the report shall identify point locations for individual plants and boundaries for plant populations.The report shall include specific recommendations for avoiding the plants. **Avoidance Measures**. SCE shall mark all populations of special-status plants within the BSA as environmentally sensitive areas on maps that are provided to construction contractors working near environmentally sensitive areas (ESAs). All populations within 25 feet of a project work area and 20 feet of an access road shall be staked and flagged or fenced for avoidance by a qualified biologist or botanist prior to construction and shall be monitored by a qualified biologist or botanist during construction to ensure proper avoidance of the species.The project work areas shall be adjusted as needed to avoid any populations of special status plants that occur within the work area to the extent feasible. All stakes and flagging shall be removed no later than 30 days after construction is complete in the area. Information about special-status plants and avoidance requirements shall be included in the Workers Environmental Awareness Training Program (MM Biology-3). In the event of a discovery of previously undocumented species, the boundary of the occurrence will be flagged,		**After construction:**The transplanted/created population(s) shall have approximately the same characteristics as the impacted population (within 10-percent density, total population number, and non-native/invasive). Replanting procedures and monitoring are implemented for 3 years or until the either success criteria are met or a financial contribution is made to an organization that restores/protects special-status populations in the project region. All stakes and flagging are removed no later than 30 days after construction is complete. Habitat compensation is provided for any transplanted populations that do not meet success criteria.

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avoided, and monitored as discussed above and the CPUC, CDFW, and/or USFWS will be notified if the species is state or federally listed. If the special-status plant species cannot be avoided, SCE shall notify CPUC in writing, and SCE shall submit a Salvage and Replanting Plan to CPUC and CDFW for approval as described below. No state or federally listed plant species shall be salvaged or relocated without obtaining permit authorization from CDFW and/or USFWS, as required. SCE shall provide the CPUC with any permits and authorizations obtained from USFWS and CDFW. SCE shall relocate the species to areas within the easement that are outside of the long-term maintenance areas. If the species occurs in an area that is subject to temporary impacts, the species shall be included in the restoration of the site (see MM Biology-2). **Salvage and Replanting Plan**. For impacts on state or federally listed or CRPR 1 or 2 plants that cannot be avoided, the qualified botanist shall prepare and implement a Salvage and Replanting Plan.The Salvage and Replanting plan would specify, at a minimum, the following: • Location of the mitigation site(s) (extent of the plants within and adjacent to project areas). • Procedures for procuring plants, such as transplanting or collecting seed from plants to be impacted, including storage locations and methods to preserve the plants. • Procedures for propagating collected seed, including storage methods. • Quantity and species of plants to be planted or transplanted. • Planting procedures, including the use of soil preparation and irrigation. • Schedule and action plan to maintain and monitor the mitigation site for a minimum 3-year period. • Reporting procedures, including the contents of annual progress reports.		

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• List of criteria (e.g., growth, plant cover, survivorship) by which to measure success of the plantings. • Contingency measures to implement if the plantings are not successful (i.e., weed removal, supplemental plantings, etc.). SCE shall submit the plan to the CPUC for review and approval no less than 30 days prior to impacting or collecting special-status plants. At a minimum, the transplanted/created population(s) shall have approximately the same characteristics as the impacted population (within 10-percent density, total population number, and non-native/invasive). Seasonal population changes may be taken into account by identifying and documenting the characteristics of an appropriate representative reference site prior to impacting a population. Reference sites that will be used must be identified and described in the Salvage and Replanting Plan. If CPUC or CDFW determines that the Salvage and Replanting Plan is not likely to be successful (due to the species' life form, habitat requirements, or other factors), then SCE shall provide compensation lands consisting of habitat occupied by the impacted CRPR 1 or 2 ranked plant occurrences at a 1:1 ratio of acreage for any occupied habitat affected by the project. Occupied habitat will be calculated on the project site and on the compensation lands as including each special-status plant occurrence. If compensation is required as a means of mitigating special-status plant impacts, it may be accomplished by purchasing credit in an established mitigation bank, acquiring conservation easements, or direct purchase and preservation of compensation lands. Compensation for these impacts may be "nested" or "layered" with compensation for habitat loss. **Annual Reporting.** Annual salvage and replanting monitoring reports shall be submitted to CPUC for a period of 3 years after transplanting to ensure success of the transplanted populations. Where transplantation has not been successful under the criteria set forth in the performance standards		

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below, compensation shall be provided to offset the loss of transplanted special-status plants. Annual reports shall include, details of plants or propagules salvaged, stored, and transplanted (salvage and transplanting locations, species, number, size, condition, etc.); adaptive management efforts implemented (date, location, type of treatment, results, etc.); and evaluation of success of transplantation. Salvage status and success will be described in the annual report.		
Mitigation Measure Biology-2: Habitat Restoration SCE shall prepare and implement a Revegetation, Restoration, and Monitoring Plan that addresses procedures for quantifying habitat impacts from construction activities and revegetation and/or restoration requirements for applicable vegetation and soils resources.The plan shall also address the requirements for restoration in the following measures: • Special-status plant populations (MM Biology-1). • Blunt-nosed leopard lizard habitat (MM Biology-6) • Burrowing owl (MM Biology-7) • Sensitive natural plant communities including riparian woodland and shrubland habitat, blue oak and valley oak woodlands, California buckeye groves, wetlands (MM Biology 11) The plan shall be developed upon completion of final design and submitted to the CPUC for review and approval no less than 60 days before commencement of construction. All temporarily disturbed areas shall be restored to near pre-construction conditions to ensure permanent impacts do not occur in areas of temporary impacts as a result of the project. Pre-construction conditions, including vegetation cover estimates and percentage of Cal-IPC list invasive weeds (plants rated as “High” and “Moderate”), shall be documented for each project work area as described below in the Pre-	Areas of temporary impact.	**Performance standard:** No greater than 1 percent of noxious, invasive weeds. Habitat restoration needs to be based on the vegetation type being impacted and the success criteria need to be based on surrounding vegetation. Areas dominated my non-native plants should require reseeding only. Greater than 70 percent of pre-project total vegetation cover within 5 years. **Timing:** Restoration of temporary impact areas shall occur within one year following completion of temporary disturbance. Monitoring to occur during blooming periods and reporting to occur annually and submitted to CPUC within 30 days of monitoring.

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Construction Report.The goal of the restoration shall be that habitat functions and values and species composition of the restored vegetation are comparable to those of nearby comparable vegetation within 3 years. The plan shall identify corrective actions to implement (e.g., removal of invasive weeds, supplemental planting, etc.) if the performance standards defined in this measure are not achieved. Work sites that have been proven to meet the performance standard defined in this measure shall not require further monitoring and reporting. **Monitoring Procedures.** A qualified biologist or botanist shall monitor vegetation resources that are impacted annually until performance standards have been met. Monitoring shall be conducted once a year during the blooming period to verify species composition and cover within all areas of temporary disturbance. **Pre-Construction Report(s).** Prior to construction, a qualified biologist or botanist shall survey all final work areas and overland access routes to identify the vegetation resources that may be impacted, including their location, composition, condition, and extent of planned project disturbance. Survey efforts may be conducted in conjunction with focused surveys required for special-status species, as described in applicable APMs and mitigation measures. Anticipated impacts on vegetation resources shall be quantified and documented in the report, such as special-status plant individuals or the characteristics of populations (i.e., estimated size and cover estimates), the types and numbers of tree and shrub individuals, and restoration acreages for sensitive natural communities and riparian areas.The baseline conditions for adjacent and comparable vegetation resources shall also be documented in the report. Such areas may be used as a control for post-construction monitoring to determine relative restoration performance and account for seasonal		

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fluctuations in invasive species composition, general growth rates, and overall coverage. The report shall include maps (1: 3,000 scale) that identify the types and locations of the vegetation resources that may be impacted, the limits of the planned work areas, and project access routes. An initial report shall be submitted to the CPUC no less than 30 days before construction. Separate reports may be submitted for each project segment, if necessary. If new impacts or restoration procedures are identified, the plan shall be updated and submitted in track changes to the CPUC. **Post-Construction Reports.** SCE shall prepare and submit Post-Construction Reports to the CPUC on an annual basis until construction is complete. Post-Construction Reports shall include table summaries of actual project impacts, and maps of the areas that identify the limits of actual impacts.The summary table shall include the location name/ID for each impact area, anticipated impact acreage from the Pre-Construction Report, and actual impact acreage during construction.The report shall include a brief statement about revegetation, restoration, and monitoring procedures that would be implemented where impacts occurred, as defined in the approved plan. **Annual Monitoring Reports.** Once revegetation and restoration begins, SCE shall conduct surveys during the growing season and submit Annual Monitoring Reports to the CPUC.The reports shall summarize revegetation and restoration efforts for each applicable impact area, provide data on how the restoration is performing relative to the performance standards, and detail any corrective actions necessary to meet performance standards. Once the performance standards have been achieved for each location, monitoring and reporting would no longer be required for the location.		

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SCE shall provide written updates to CPUC upon request regarding seasonally dependent restoration and corrective actions prior to submission of the annual monitoring reports.		
Mitigation Measure Biology-3: Worker Environmental Awareness Program All workers on the project site shall be required to attend a Worker's Environmental Awareness Training Program (WEAP). Training shall inform all construction personnel of the resource protection and avoidance measures as well as procedures to be followed upon the discovery of environmental resources. WEAP training materials will include avoidance and minimization measures being implemented to protect biological resources, cultural resources, and paleontological resources, and the management of hazardous materials. WEAP training will also discuss terms and conditions of any permits or agreements, information on federal and state environmental laws, and consequences and penalties for violation or noncompliance with these laws, regulations, and project permits. Workers will be informed about the presence, identification, life history, and habitat requirements of the special-status species that have a potential to occur in the project area. The WEAP training program will be provided to the CPUC at least 30 days prior to construction for CPUC verification that all mitigation measures and topics are addressed. SCE will be responsible for maintaining WEAP training logs. At a minimum, the logs will contain the name, company, and date of training. These logs will be made available to the CPUC within a month after training is completed. The WEAP training will include, at a minimum, the following topics so crews will understand their obligations: • ESA and other delineated boundaries (e.g., work areas) and how to recognize/avoid exclusion areas and sensitive habitat and specific avoidance or minimization measures for sensitive species and habitats	All work areas	**Performance standard:** All workers receive environmental awareness training prior to performing work on the site. **Timing:** WEAP training program to be developed prior to construction and provided to CPUC for review and approval at least 30 days prior to construction. Workers to be trained prior to conducting work on the Project site.

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• Housekeeping (e.g., trash management and equipment cleaning) • Safety, hazardous materials, and fire management, including hazardous substance spill prevention and containment measures • Work stoppage • Communication protocol • Consequences of non-compliance • Stormwater Pollution Prevention Plan (SWPPP) procedures • How to identify cultural resources; avoidance requirements and procedures to be followed if unanticipated cultural resources are discovered during construction; disciplinary actions that may occur when historic preservation laws and project proponent policies are violated • How to identify paleontological resources, including types of fossils that could occur in the project area and types of lithologies in which the fossils could be preserved; avoidance requirements and procedures to be followed if a fossil is discovered during construction; penalties for disturbing paleontological resources • Review of mitigation and avoidance measures		
Mitigation Measure Biology-4: Crotch Bumble Bee Avoidance Procedure Focused Survey: Focused surveys shall be conducted in accordance with CDFW's Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023) the season immediately prior to ground disturbing activities are scheduled to occur. A minimum of three Crotch bumble bee focused surveys shall be conducted at 2-to-4-week intervals during the colony active period (April through August) when Crotch's bumble bees are most likely to be detected. Non-lethal, photo voucher surveys shall be completed by a biologist who holds a Memorandum of Understanding to capture and handle Crotch's bumble bee (if nesting and chilling protocol is to be	Suitable habitat for Crotch's bumble bee	**Performance standard:** • Complete focused surveys for Crotch's bumble bee a season prior to construction. • Complete two nesting surveys one week prior and 24 hours prior to ground disturbing activities. • Nest avoidance buffers are implemented and monitoring is conducted per the measure if any active bee colonies occur. • Habitat mitigation at a 1:1 ratio.

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utilized) or by a CDFW approved biologist experienced in identifying native bumble bee species (if surveys are restricted to visual surveys that will provide high-resolution photo documentation for species verification). The surveyor shall walk through all areas of suitable habitat focusing on areas with floral resources. Surveys shall be completed at a minimum of one person-hour of searching per three acres of suitable habitat during suitable weather conditions (sustained winds less than 8 mph, mostly sunny to full sun, temperatures between 65 and 90 degrees Fahrenheit) at an appropriate time of day for detection (at least an hour after sunrise and at least two hours before sunset, though ideally between 9:00 AM and 1:00 PM). Pre-Construction Survey: Nesting surveys shall be conducted with focus on detecting active nesting colonies within one week and 24-hours immediately prior to ground disturbing activities. If an active Crotch bumble bee nest is detected, an appropriate no disturbance buffer zone (including foraging resources and flight corridors essential for supporting the colony) shall be established by a qualified biologist in consultation with CDFW around the nest to reduce the risk of disturbance or accidental take. Nest avoidance buffers may be removed at the completion of the flight season and/or once the qualified biologist deems the nesting colony is no longer active and CDFW has provided concurrence of that determination. If no nests are found but the species is present, a full-time qualified biological monitor shall be present during vegetation removal or ground disturbing activities that are scheduled to occur during the queen flight period (February through March), colony active period (March through September), and/or gyne flight period (September through October). Because bumble bees move nest sites each year, three preconstruction nesting surveys shall be required during each subsequent year of construction, regardless of the previous year's findings, whenever		**Timing:** • Focused surveys season prior to ground disturbing activities • Pre-construction survey 1 week and 2 days prior to activities Monitoring during construction, where needed. • Mitigation prior to ground disturbing activities

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vegetation removal and ground disturbing activities are scheduled to occur during the flight season (February through October). SCE may relocate Crotch's bumble bees out of the work area only if a CESA incidental take permit has been obtained and any relocation follows the terms of the incidental take permit. Compensatory Mitigation: Compensatory mitigation for permanent direct impacts to suitable Crotch's bumble bee habitat shall be offset through compensatory mitigation, which may include, but is not necessarily limited to, on-site or off-site habitat preservation, enhancement, restoration, and/or creation at a ratio of no less than 1:1.		
Mitigation Measure Biology-5: Pre-Construction Surveys for Special-Status Wildlife and Construction Monitoring and Avoidance Procedures Biologist Approval and Qualifications. A qualified biologist(s) will be pre-approved by the CPUC prior to conducting biological surveys and monitoring for the project. Qualified biologists are defined as individuals with a bachelor's degree or above in a biological science field and demonstrated field experience. Approved and qualified biologists shall conduct required surveys and monitoring for special-status species and active nests. Qualified avian biologists are defined as individuals with demonstrated field expertise in ornithology, in particular, nesting behavior and nest detection. Monitoring biologists conducting avian nest checks shall have demonstrated experience surveying or monitoring nesting birds. Qualified botanists are defined as individuals with demonstrated field expertise in botany. Qualified herpetologists are defined as individuals with demonstrated experience with California reptile and amphibian species. Biologists qualified for construction monitoring shall hold at minimum 1 to 2 years of construction-related biological monitoring experience. Biologists	All work areas and access roads within 200 feet of suitable habitat for special-status species	**Before construction:** (1) SCE submits qualifications for qualified biologists to the CPUC for review and approval; (2) A qualified biologist performs pre-construction surveys for special-status wildlife no earlier than 30 days prior to activity in all work areas within suitable habitat; (3) Survey reports are submitted to CPUC for review, and the results are submitted to CDFW and USFWS as required by any other regulatory permits or approvals. **During Construction:** (1) Biological monitoring is conducted when working in proximity to sensitive habitats and at least once a week; (2) Signs and marking and flagging material are maintained and repaired; (3)The biological monitor halts construction if it will impact a sensitive resource/species; and (4) Species are relocated out of harm's way, if appropriate.

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qualified as a lead biological monitor shall have 5 or more years of related experience. Pre-Construction Surveys. A CPUC-approved qualified biologist (i.e., a biologist with the requisite education and experience to address special-status species and biological resources with potential to occur in the project area) shall conduct a pre-construction survey for special-status wildlife species known to occur or with the potential to occur in all work areas located within suitable habitat for special-status species. In those situations where the qualified biologist cannot make a definitive species identification, the qualified biologist shall make a determination based on the available evidence and professional expertise.The pre-construction survey shall be conducted no earlier than 7 days prior to surface disturbance in each work area.The results of the pre-construction survey will be documented by the qualified biologist in a pre-construction survey report(s).The pre-construction survey report(s) shall be submitted to the CPUC for review and approval and the results shall be submitted to CDFW and USFWS as required by any other regulatory permits or approvals.The pre-construction survey report(s) will include the following: • Special status species encountered, including potential breeding sites such as dens, burrows, nests, or aquatic habitat • Type, location, and size of Project impact areas • Date, time, and weather conditions during survey, and surrounding land uses • Evaluation of type and quality of habitat • Map or GIS of survey area and of work area **Monitoring:** Where pre-construction surveys indicate the presence of sensitive species within 200 feet of a work area or sensitive habitats within 50 feet of a work area, a CPUC approved biologist(s) shall conduct		**After construction:** All stakes and flagging for sensitive resources are removed no later than 30 days after construction is complete.

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biological monitoring during construction activities in proximity to the sensitive species or habitats. Extended monitoring buffers for sensitive species may be applied per the conditions of other APMs or mitigation measures. Where special-status species (e.g., amphibians, reptiles, birds, mammals, and bat roosts), sensitive natural communities, riparian areas, or wetlands may occur, unless otherwise determined absent through pre-construction surveys, a qualified biological monitor shall monitor construction activities to ensure that any unplanned or unpermitted impacts to special-status species, sensitive natural communities, riparian habitat, and wetlands are avoided. Resource Avoidance: Prior to construction or access in any area containing or potentially containing special-status species habitats, sensitive natural communities, riparian areas, or wetlands, the biological monitor shall mark or otherwise delineate the limits of special-status species habitat, sensitive natural communities, riparian areas, and wetlands for avoidance, and where necessary, post signs at access route entrances to inform workers of special access considerations (i.e., seasonal restrictions, biological monitor escort, etc.). Resource markings and signs shall be maintained and repaired as needed and as directed by the biological monitor. All stakes and flagging are removed no later than 30 days after construction is complete. The biological monitor shall have full authority to halt construction, once safe to do so, if a sensitive resource/species has or may be impacted. The biological monitor may relocate wildlife out of harm's way, if appropriate to protect the species (additional protections or permits would be required prior to relocation of any state or federally listed threatened or endangered species). The biological monitor shall revisit each active work site at least once a week to inspect the work area for the presence of biological		

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resources and verify that all avoidance measures (e.g., flagging or fencing) are in place.		
Mitigation Measure Biology-6: Blunt-nosed leopard lizard Compensatory Mitigation SCE shall submit a report to USFWS, CDFW, and CPUC documenting (i) the total area of temporary and permanent impacts in blunt-nosed leopard lizard suitable habitat, (ii) the total area of habitat restoration that would offset the temporary and permanent impact, and (iii) the total area of temporary and permanent impact that is not offset by habitat restoration, which would require compensatory mitigation.The report shall be submitted to USFWS, CDFW, and CPUC at least 60 days prior to construction in suitable habitat. Where impacts cannot be fully offset by habitat restoration, compensatory mitigation shall be provided to offset the permanent and temporary loss of suitable habitat for blunt-nosed leopard lizard. Mitigation for permanent impacts will be provided at a minimum ratio of 1:1 and temporary impacts at a ratio of 0.5:1, unless a higher ratio is required by authorizations issued under FESA for blunt-nosed leopard lizard. Compensatory mitigation shall include either: • Purchase of mitigation credits from an agency-approved mitigation bank. • Protection of habitat through acquisition of fee-title or conservation easement and funding for long-term management of the habitat.Title to lands acquired in fee will be transferred to CDFW and conservation easements will be held by an entity approved in writing by the applicable regulatory agency. In circumstances where SCE protects habitat through a conservation easement, the terms of the conservation easement will be subject to approval of the applicable regulatory agencies, and the	Permanent impacts in suitable blunt-nosed leopard lizard habitat.	**Before construction:** (1) SCE submits a report to USFWS, CDFW, and CPUC documenting habitat that would require compensatory mitigation at least 60 days prior to construction and (2) Compensatory mitigation is acquired and approved by USFWS (as needed) prior to activities within blunt-nosed leopard lizard suitable habitat. A compensatory mitigation plan using the minimum compensatory ratios and mitigation pathways described in this measure shall be drafted and approved by appropriate agency prior to activities within TSS and KCSS suitable habitat. If mitigation cannot be acquired prior to activities in habitat, SCE will provide a letter of credit to USFWS and CDFW will a mutually approved entity/lender. **During construction:** N/A **After construction:** N/A

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conservation easement will identify applicable regulatory agencies as third-party beneficiaries with a right of access to the easement areas. Compensatory mitigation shall be acquired and approved by USFWS and appropriate agency (as needed) prior to activities within blunt-nosed leopard lizard suitable habitat.		
Mitigation Measure Biology-7: Tehachapi Slender Salamander and Kern Canyon Slender Salamander Compensatory Mitigation SCE shall submit a report to USFWS, CDFW, and CPUC documenting (i) the total area of temporary and permanent impacts in Tehachapi slender salamander and Kern Canyon slender salamander habitat, (ii) the total area of habitat restoration that would offset the temporary and permanent impact, and (iii) the total area of temporary and permanent impact that is not offset by habitat restoration, which would require compensatory mitigation. The report shall be submitted to USFWS, CDFW, and CPUC at least 60 days prior to construction in Tehachapi slender salamander and Kern Canyon slender salamander habitat. Where impacts cannot be fully offset by habitat restoration, compensatory mitigation shall be provided to offset the permanent loss of habitat. Mitigation for permanent impacts will be provided at a minimum ratio of 1:1. Compensatory mitigation shall involve protection of habitat through acquisition of fee-title or conservation easement and funding for long-term management of the habitat. Conservation easements will be held by an entity approved by CDFW.	Permanent impacts in suitable Tehachapi slender salamander and Kern Canyon slender salamander habitat.	**Before construction:** (1) SCE submits a report to USFWS, CDFW, and CPUC documenting habitat that would require compensatory mitigation at least 60 days prior to construction within suitable habitat and (2) Compensatory mitigation is acquired and approved by CDFW prior to activities within suitable habitat. A compensatory mitigation plan using the minimum compensatory ratios and mitigation pathways described in this measure shall be drafted and approved by appropriate agency prior to activities within TSS and KCSS suitable habitat. If mitigation cannot be acquired prior to activities in habitat, SCE will provide a letter of credit to USFWS and CDFW with a mutually approved entity/lender. **During construction:** N/A **After construction:** N/A
Mitigation Measure Biology-8: Nesting Bird Management **Nesting Bird Management Plan.** SCE shall prepare a Nesting Bird Management Plan (NBMP) in coordination with CPUC. The NBMP shall describe methods to minimize potential project effects to nesting birds and avoid any potential for unauthorized take. Project-related disturbance	All work areas.	**Before construction:** Prepare NBMP for CDFW and CPUC review and approval. **During construction:** (1) Implement pre-construction surveys per the NBMP; (2) Avoid active nests and implement nest buffers,

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including construction and pre-construction activities shall not proceed within 300 feet of active nests of common bird species or 500 feet of active nests of raptors and 500 feet of active nests of tricolored blackbirds until approval of the NBMP by CPUC in consultation with CDFW and USFWS. **NBMP Content.** The NBMP shall include: (1) definitions of default nest avoidance buffers for each species or group of species, depending on characteristics and conservation status for each species; (2) a notification procedure for buffer distance reductions should they become necessary; (3) a rigorous monitoring protocol, including qualifications of monitors, monitoring schedule, and field methods, to ensure that any project-related effects to nesting birds will be minimized; and (4) a protocol for documenting and reporting any inadvertent contact or effects to birds or nests. The paragraphs below describe the NBMP requirements in further detail. **Background.** The NBMP shall include the following: • A summary of applicable state and federal laws and regulations, including definition of what constitutes a nest or active nest under federal law. • A procedure for amendment of the NBMP, should there be changes in applicable state or federal regulations, and requirement for CDFW review of any NBMP amendment. • A list of bird species potentially nesting on or near the ROW or other work areas, indicating approximate nesting seasons, nesting habitat, typical nest locations (e.g., ground, vegetation, structures, etc.), tolerance to disturbance (if known) and any conservation status for each species. • A list of the types of project activities (construction, operations, and maintenance) that may occur during nesting season, with a short		deterrents, and communication per the measure and NBMP; (3) Update FRED throughout construction; and 4) submit annual reports to CPUC, CDFW, and USFWS. **After construction:** N/A

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description of the noise and physical disturbance resulting from each activity. Clearing of any vegetation, site preparation in open or barren areas, or other project related activities that may adversely affect breeding birds shall be scheduled outside the nesting season, as feasible. **Pre-construction nest surveys.** Pre-construction nest surveys will be conducted prior to any construction activities scheduled during the breeding period. For this project, the breeding period will be defined as January 1 through September 15.The NBMP shall describe the proposed field methods, survey timing, and qualifications of field biologists.The avian biologists conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques such as those described in Martin and Guepel (1993). Nest surveys will focus on visual searches for nest locations and observations of bird activities and movement to detect nesting activity (e.g., carrying nest materials or food, territorial displays, courtship behavior). Surveys shall be conducted in accordance with the following guidelines: Surveys shall cover all potential nesting habitat within the ROW or other work areas within 500 feet of these areas for raptors and 300 feet for non-raptors. Pre-construction surveys shall be conducted for each work area, no longer than 10 days prior to the start of construction activity. On the first day of construction at any given site, a qualified Avian Biologist will perform a pre-construction “sweep” to identify any bird nests or other resources that may have appeared since the 10-day survey. SCE shall provide the CPUC a report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity of the surveyor(s); a list of species observed; and electronic data identifying nest locations and the boundaries of buffer		

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zones.The electronic data set will be updated following each preconstruction nest survey throughout the nesting season.The format and contents of this report will be described in the draft NBMP and will be subject to review and approval by CPUC. **Nest Buffers and Acceptable Activities** Nest buffers shall be delineated on the work site, to consist of clearly visible marking and signage. Buffer locations shall be communicated to the construction contractor and shall remain in effect until formally discontinued (when each nest is no longer active). Measures to ensure nesting buffers are observed shall include direct communication and decision protocol to stop work within buffer areas. In some cases, active nests may be found while work is underway.Therefore, a protocol shall be implemented for stopping ongoing work within the buffer area, securing the work site, and removing personnel and equipment from the buffer. Buffer distances from active nests shall be implemented to avoid take or adverse effects to nests. Buffers shall be based on the specific nature of the bird species and conservation status, and other pertinent factors. Buffer distances shall be defined specific to each species relative level of tolerance of human activity. If no information is available to specify a buffer distance for a species, then a 300 foot buffer shall apply as a standard buffer distance for migratory birds, and 500 feet of active nests of raptors and 1,000 feet of active nests of tricolored blackbirds. All applicable avoidance measures, including buffer distances, must be continued until nest monitoring (below) confirms that the nestlings have fledged and dispersed, or the nest is no longer active. For each special-status species potentially nesting within or near project work areas, the NBMP shall specify applicable buffers and any additional nest protection measures, specialty monitoring, or restrictions on work activities, if needed.		

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The NBMP shall identify acceptable work activities within nest buffers (e.g., pedestrian access for inspection or BMP repair) including conditions and restrictions, and any monitoring required.The NBMP shall include pictorial representation showing buffer distances for ground buffers, vertical helicopter buffers, and horizontal helicopter buffers for nests near the ground and nests in towers. **Nest Buffer Modification or Reduction** At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments shall be reviewed and recommended by a qualified avian biologist, who has been approved by CPUC in consultation with the CDFW and USFWS.The NBMP shall provide a procedure and timing requirements for notifying CPUC, CDFW, and USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds.The NBMP will list the information to be included in buffer reduction notifications in a standardized format. **Nest deterrents** The NBMP shall describe any proposed measures or deterrents to prevent or reduce bird nesting activity on project equipment or facilities, such as buoys, visual or auditory hazing devices, bird repellents, securing of materials, and, vehicles, and equipment. It shall also include timing for installation of nest deterrents and field confirmation to prevent effects to any active nest; guidance for the contractor to install, maintain, and remove nest deterrents according to product specifications; and periodic monitoring of nest deterrents to ensure proper installation and functioning and prevent injury or entrapment of birds or other animals. In the event that an active nest is located on project facilities, materials or equipment, SCE will avoid disturbance or use of the facilities, materials, or equipment (e.g., by red-tag) until the nest is no longer active.		

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Communication The NBMP shall specify the responsibilities of construction monitors in regard to nests and nest issues and specify a direct communication protocol to ensure that nest information and potential adverse impacts to nesting birds can be promptly communicated from nest monitors to construction monitors, so that any needed actions can be taken immediately. The NBMP shall specify a procedure to be implemented following accidental disturbance of nests, including wildlife rehabilitation options. It also shall describe any proposed measures, and applicable circumstances, to prevent take of precocial young of ground-nesting birds such as killdeer or quail.. Finally, the NBMP will specify a procedure for removal of inactive nests, including verification that the nest is inactive and a notification/approval and approval process prior to removal. **Monitoring** SCE shall be responsible for monitoring the implementation, conformance, and efficacy of the avoidance measures (above).The NBMP shall include specific monitoring measures to track any active bird nest within or adjacent to project work areas, bird nesting activity, project-related disturbance, and outcome of each nest. For nests with reduced buffers, SCE shall monitor each nest until nestlings have fledged and dispersed or until the nest becomes inactive. Nests with default buffers do not require further monitoring once construction work is completed in the area. New nests discovered after work completion in an area will not require monitoring. In addition, monitoring shall include pre-construction surveys, daily sweeps of work areas and equipment, and any special monitoring requirements for particular activities (tree trimming, vegetation removal, etc.) or particular species (noise monitoring, etc.). Nest monitoring shall		

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continue throughout the breeding season during each year of the project's construction activities. **Reporting** Throughout the construction phase of the project, nest locations, project activities in the vicinity of nests (including helicopter routes), and any adjustments to buffer areas shall be updated and available to CPUC monitors on a daily basis in the Field Reporting Environmental Database (FRED). All buffer reduction notifications and prompt notifications of nest-related non-compliance and corrective actions will be made via email to CPUC monitors. In addition, the NBMP shall specify the format and content of nest data to be provided in regular monitoring and compliance reports. At the end of each year's nest season, SCE will submit an annual NBMP report to the CPUC, CDFW, and USFWS.		
Mitigation Measure Biology 9: Burrowing Owl **Conduct Surveys and Avoidance for Burrowing Owl.** Burrowing owl surveys shall be conducted by a qualified biologist in accordance with the most current CDFW guidelines (CDFG 2012; or updated guidelines should they become available). SCE shall implement buffers for active burrowing owl burrow within or adjacent to a work area.The buffer for active burrowing owl nesting sites shall be in accordance with CDFW guidelines (CDFG 2012) and shall be as follows: 1. From April 1-August 15, buffers shall be 300 feet for low levels of disturbance (i.e., vehicles, worker presence), and 500 feet for moderate to high levels of disturbance (i.e., demolition, grading, tree felling, helicopter use) 2. From August 16-October 15, buffers shall be 600 feet for low and moderate levels of disturbance (i.e., vehicles, worker presence, tree	Where active burrowing owl nesting sites are present within 1,500 feet of work areas.	**Before construction:** Burrowing owl surveys are conducted by a qualified biologist in accordance with the most current CDFW guidelines. **During construction:** (1) Appropriate buffers are employed as defined by current CDFW guidelines and in this measure based on timing and activity disturbance level; (2) Active burrows are avoided to the highest extent possible; (3) Passive relocation is considered only if all possible avoidance measures are not feasible and will be implemented in accordance with the procedures in the measure and CDFW requirements; and (4) Replacement burrows are constructed as defined in the measure and any CDFW incidental take permit, if applicable.

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felling, grading), and 1,500 feet for high levels of disturbance (i.e., helicopter use) 3. From October 16-March 31, buffers shall be 150 feet for low levels of disturbance (i.e., vehicles, worker presence), 300 feet for moderate levels of disturbance (i.e., grading, tree felling), and 1,500 feet for high levels of disturbance (i.e., helicopter use) 4. Binocular surveys may be substituted for protocol field surveys on private lands adjacent to the project site only when SCE has made reasonable attempts to obtain permission to enter the property for survey work but was unable to obtain such permission. 5. If active burrowing owl burrows are located within project work areas, they shall be avoided to the greatest extent possible through work exclusion buffers as described above. Monitoring of active burrowing owl nests shall occur in all buffer areas as defined above, and other methods to reduce disturbance (such as visual or sound barriers) shall be employed depending on the type and level of work being conducted to prevent the need for relocation. Other measures shall include eliminating actions that reduce burrowing surrogates (e.g., ground squirrels), and the WEAP (MM Biology-3) shall include measures to reduce the potential for the introduction or attraction of predator species, such as litter control. 6. In any cases where active burrows could not be adequately avoided, as determined by a qualified biologist, through exclusion buffers and project activities could result in substantial indirect disturbance, direct physical disturbance, or destruction of burrows that are located within certain project work areas (i.e., facility footprints, areas that require grading, etc.), SCE may passively relocate the owls, as described below and per the conditions of any required CESA incidental take permit. Passive relocation shall only be considered if work cannot take place		**After construction:** Monitoring and reporting for replacement burrows and relocation sites is provided to CPUC.

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due to active nest, such as grading over burrows. No passive relocation of burrowing owls shall be permitted during breeding season, unless a qualified biologist verifies through noninvasive methods that an occupied burrow is not occupied by a mated pair, and only upon authorization by CDFW. Any passive burrowing owl relocation shall address: a. **Replacement Burrows.** For each burrowing owl that will be passively relocated, if fewer than two suitable unoccupied burrows are available within 600 feet of the affected project work site, then SCE shall construct at least two replacement burrows within 600 feet of the affected project work site, or in suitable locations within 0.25 mile when suitable locations within 600 feet are not available. Burrow replacement sites shall be in areas of suitable habitat for burrowing owl nesting, and subject to minimal human disturbance and access.The Burrowing Owl Exclusion Plan shall be prepared that would describe measures to ensure that burrow installation or improvements will not affect sensitive species habitat or any burrowing owls already present in the relocation area.The Burrowing Owl Exclusion Plan shall provide guidelines for creation or enhancement of at least two natural or artificial burrows for each active burrow within the project disturbance area, including a discussion of timing of burrow improvements, specific location of burrow installation, and burrow design. Design of the artificial burrows shall be consistent with CDFW guidelines (CDFG, 2012; or more current guidance as it becomes available) and the Burrowing Owl Exclusion Plan shall be approved by the CPUC and CDFW.. b. **Methods.** An occupied burrow may not be disturbed during the nesting season (generally, but not limited to, February 1 to August 31), unless a qualified biologist determines, by non-invasive		

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methods, that it is not occupied by a mated pair. Passive relocation will include installation of one-way doors on burrow entrances that will let owls out of the burrow but will not let them back in. Once owls have been passively relocated, burrows will be carefully excavated by hand and collapsed by, or under the direct supervision, of a qualified biologist. **Monitoring and Reporting**. SCE shall monitor the replacement burrow site(s), and provide monitoring reports consistent with CDFW guidance (CDFG 2012).The objective shall be to manage the relocation area for the benefit of burrowing owls, with the specific goal of maintaining the functionality of the burrows for a minimum of two years. Monitoring will be conducted after the burrowing owl passive relocation process is complete, up until the onset of ground disturbance due to construction to ensure that owls do not re-establish themselves.The artificial burrows or enhanced replacement burrows will be monitored for a period that will be defined in the site-specific relocation plan to determine if they are being used by owls. Monitoring reports shall be available to the CPUC.		
Mitigation Measure Biology 10: Bald Eagle and Golden Eagle Avoidance and Minimization **Avoid and minimize impacts.** All project activities located within areas identified as habitat (as described in theTLRR Habitat and Sensitive Species Report for the GKR Project) shall implement the following avoidance and minimization measures. • Bald eagle and golden eagle nest surveys will be performed when construction activities are scheduled to occur in or near bald eagle or golden eagle nesting habitat from January 1-August 31 to determine if any eagle nests are active within a 1-mile radius. Ground-based or helicopter-based survey methods will be developed in coordination with	Activities within 1 mile of a bald eagle or golden eagle nest.	**Before construction:** Surveys are conducted for bald eagle and golden eagle following USFWS and CDFW protocols the survey season immediately prior to Project activities. **During construction:** SCE conducts a nesting survey for all activities within 1 mile of suitable habitat for bald eagle and golden eagle in the period January 1 to August 31. Nest buffers shall be implemented per the measure and USFWS requirements. **After construction:** N/A.

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USFWS and will be consistent with current USFWS and CDFW survey guidelines, or as recommended by USFWS and CDFW. Surveys shall be conducted one season prior to Project implementation following CDFW *Bald Eagle Survey Instructions Protocol* and USFWS *Protocol for the Interim Golden Eagle Inventory and Monitoring Protocol*. • For construction activity, should an active bald eagle and golden eagle nests be present, the nest shall receive a 1-mile buffer if in line of sight, 0.5-mile buffer if no line of sight—with USFWS concurrence. • Buffers and buffer modifications for bald eagle and golden eagles will be addressed in the Project Nesting Bird Management Plan (Mitigation Measure Biology-8).		
Mitigation Measure Biology-11: Swainson's Hawk Swainson's hawk nest surveys shall be performed by a CPUC-approved qualified biologist following the protocol in Swainson's Hawk Technical Advisory (2000) in areas of suitable habitat prior to construction activities scheduled to occur during the Swainson's hawk nesting season (from March 1-July 31). Surveys shall be conducted within 0.5 miles of suitable nesting habitat for Swainson's hawk to determine if any Swainson's hawk nests are active within a 0.5-mile radius of the construction area. Suitable habitat for Swainson's hawk is defined as the following: • Nesting habitat includes trees within mature riparian forest or corridors, lone oak trees and oak groves, and mature trees near fields. • If any active nests are located, the following shall apply: – An active nest shall receive a 0.5-mile buffer between March 1 and July 31. Buffer zones may be adjusted in consultation with CDFW and approved by CPUC, and must be protective of the species nesting behavior with continued monitoring of the nest by a qualified biologist.	Suitable habitat for Swainson's hawk	**Before construction:** Pre-construction surveys are performed by a qualified biologist for active Swainson's hawk nests prior to construction that would take place between March 1 and July 31. **During construction:** Appropriate buffers for construction activities are applied for active Swainson's hawk nests (0.5-mile radius between March 1 and September 15). No trees containing Swainson's hawk nests are removed during the nesting season. **After construction:** N/A

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– Do not remove Swainson's hawk nest trees unless tree avoidance is infeasible. Removal of any trees that are used by Swainson's hawk for nesting shall only occur only outside of the Swainson's hawk nesting season during the timeframe of October 1 (after a qualified biologist has confirmed the nest to be inactive) and the last day in February. For hawks found injured during project-related activities on the project site, SCE shall consult with CPUC and CDFW for immediate relocation to an agency-approved raptor recovery center.		
Mitigation Measure Biology-12: American Badger A qualified biologist shall conduct a pre-construction survey for active American badger dens within one day prior to grading or vegetation clearing in work areas, or use of overland access routes.The pre-construction survey area shall be required for potentially suitable habitat for American badger (e.g., grasslands and woodlands) located within 250 feet of work areas where grading or land vegetation clearing may occur and within or immediately adjacent to overland access routes. SCE shall submit the survey results to CPUC prior to construction. SCE may use cameras to determine if dens are active. If active dens are identified at any time during construction, the dens shall be flagged and avoided to the greatest extent possible through work exclusion buffers. A 250-foot work restriction buffer shall be established around active maternal dens. For non-maternal dens, a 50-foot work restriction buffer shall be established around active dens. Smaller buffers may be established through consultation with CDFW. If any cases where an active den cannot be adequately avoided (i.e., the den is located within the facility footprints or active work area), SCE will implement passive exclusion techniques by sealing the den after animals have vacated (e.g., one way doors). SCE shall	Suitable habitat for American badger (e.g., grasslands and woodlands) within 250 feet of work areas where grading or land vegetation clearing may occur and within or immediately adjacent to overland access routes.	**Before construction:** Pre-construction surveys are conducted for American badger dens and survey results are submitted to the CPUC. **During construction:** (1) Work restriction buffers are implemented, and (2) Construction activities near active dens are monitored. **After construction:** N/A

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obtain any required permits and/or consult with CDFW prior to implementing any den exclusions. A qualified biologist shall inspect construction activities near active American badger dens on a weekly basis to ensure the work restriction buffers are implemented appropriately and active dens are avoided.		
Mitigation Measure Biology-13 San Joaquin Kit Fox Habitat Prior to construction within San Joaquin kit fox habitat, compensatory habitat mitigation shall be provided to offset the loss of suitable habitat for San Joaquin kit fox. Mitigation for permanent impacts will be provided at a minimum ratio of 1:1. Compensatory mitigation shall include either: • Purchase of mitigation credits from an agency-approved mitigation bank. • Protection of habitat through acquisition of fee-title or conservation easement and funding for long-term management of the habitat. Title to lands acquired in fee will be transferred to CDFW and conservation easements will be held by an entity approved in writing by the applicable regulatory agency. In circumstances where SCE protects habitat through a conservation easement, the terms of the conservation easement will be subject to approval of the applicable regulatory agencies, and the conservation easement will identify applicable regulatory agencies as third-party beneficiaries with a right of access to the easement areas. Compensatory mitigation shall be acquired and approved by USFWS (as needed) prior to activities within San Joaquin kit fox suitable habitat.	Suitable habitat for San Joaquin kit fox.	**Before construction:** Permanent impacts within San Joaquin kit fox habitat are determined and proof submitted of mitigation credits for habitat acquisition in compliance with the measure. A compensatory mitigation plan using the minimum compensatory ratios and mitigation pathways described in this measure is drafted and approved by appropriate regulatory agency prior to activities within SJKF suitable habitat. If mitigation cannot be acquired prior to activities in habitat, SCE provides a letter of credit to USFWS and CDFW with a mutually approved entity/lender. **During construction:** N/A **After construction:** N/A
Mitigation Measure Biology-14: Tipton Kangaroo Rat Avoidance and Minimization **Pre-construction Survey/Construction Monitoring.** Prior to initial ground-disturbing activities, a qualified (permitted Tipton kangaroo rat) biologist will conduct habitat assessment surveys within areas identified as	Suitable habitat for Tipton kangaroo rat	**Before construction:** Pre-construction surveys are conducted for Tipton kangaroo rat and results submitted to CPUC and CDFW. **During construction:** (1) Work restriction buffers are implemented; (2) Construction activities near

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potentially suitable habitat forTipton kangaroo rat to determine suitability Prior to project activities SCE will provide a map of potentially suitable habitat forTipton kangaroo rat along the project alignment. **Conduct surveys and avoidance forTipton kangaroo rat.** Prior to the start of construction, within potentially suitable habitat forTipton kangaroo rat (TKR), SCE shall conduct focused surveys to determine if there are any active burrows with possibleTKR sign (burrows, scat, etc.) within 100 feet of proposed ground disturbing activities. All surveys shall be conducted by a qualified biologist who holds the appropriate USFWS and CDFW permits to conduct trapping surveys forTKR.Trapping Plans shall approved by CDFW and USFWS prior to any trapping activities. IfTKR sign is present, and SCE cannot avoid potentially suitable burrows then SCE shall conduct focused protocol trapping surveys according to accepted protocols to determine presence or absence ofTKR. IfTKR are present, then SCE shall take additional measures to prevent or minimize take, such as flagging for avoidance and establishment of 30' avoidance buffers. Under the direction of a qualified biologist, cover boards to prevent burrow collapse may also be used to allow for work area access. Other avoidance measures may be required, subject to authorization by USFWS and CDFW. IfTKR are absent, no measures shall be required. Construction activities shall avoid suitableTKR habitat to the extent feasible. All requirements will be followed for any take authorizations granted by USFWS and/or CDFW. A qualified biologist will monitor construction activities within occupied habitat. **Avoid and Minimize Impacts.** All project activities located within areas identified as occupiedTKR habitat shall implement the following avoidance and minimization measures:		active dens are monitored; and (3) construction materials are covered and inspected. **After construction:** N/A

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• **Limited Operating Period.** SCE shall restrict work to daylight hours, except during an emergency or critical construction activity, in order to avoid nighttime activities when TKR may be present on access roads. No night lighting will be used within TKR habitat except during an emergency or critical construction activities. • **Trash disposal.** Trash and food items will be contained in closed containers and removed daily to reduce attracting predators. • **Pets Prohibited.** Employees will not bring pets or other animals to the GKR Project area, unless the animal is ADA compliant. • **Vehicle Travel.** During construction-related activities, motor vehicles will be limited to maintained roads, designated routes, and areas identified as being permanently or temporarily affected by construction within the Project footprint. Motor vehicle speeds along Project routes and access roads within habitat for TKR will not exceed 15 miles per hour. **Trapped Animal Prevention.** All auger holes, trenches, pits, or other steep-sided excavations that may pose a hazard to TKR will be either constructed with escape ramps (earthen or wooden) or securely covered when unattended to prevent entrapping animals. At the start and end of each workday, and just before backfilling, all excavations will be inspected for trapped animals. Any TKR found will be allowed to escape unimpeded. If a TKR is trapped and does not leave on its own, a qualified biologist will move the animal according to agency authorizations, if there is no agency authorization, the TKR shall not be moved (unless in imminent danger) until the relevant agency has been contacted and further guidance has been received. **Cover and Inspect Construction Materials.** All construction pipes, culverts, or similar structures with a diameter of approximately 1 inch or greater that are stored for one or more overnight periods will be thoroughly inspected for TKR before the pipe is subsequently buried, capped, otherwise used or		

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moved in any way. If a TKR is discovered inside construction material and does not leave on its own, the materials shall not be moved until the relevant agency has been contacted and further guidance has been received. Any kangaroo rat found will be allowed to escape unimpeded.		
Mitigation Measure Biology-15: Bat Avoidance and Minimization **Pre-construction Surveys.** A qualified bat biologist will conduct surveys before the start of construction to identify active bat roosting or maternity colonies within or adjacent to project impact areas in trees, rock outcrops, caves, and mines with bat roost potential. A one-night visual emergence survey during acceptable weather conditions (e.g., no rain or high winds, night temperatures >45F) may be employed to determine presence. Alternatively, the roost can be physically examined if conditions permit (e.g., remote cameras or lift equipment). High-value habitat features (large tree cavities, crevices, bark fissures, basal hollows, loose or peeling bark, larger snags, palm trees with intact thatch, mines, rock outcrops, buildings, etc.) will be identified and the area around these features searched for bats and bat sign (guano, culled insect parts, staining, etc.). Riparian woodland, orchards, and stands of mature broadleaf trees shall be considered potential habitat for solitary foliage roosting bat species, such as the solitary western red bat and western yellow bat. If no roosts (maternity, wintering, or otherwise) are present, tree trimming/removal may continue as planned. If an active roost has been identified or lasiurine bats are present, removal of trees around the roost would be conducted between September 15- October 30, and February 15-April 15, which corresponds to time periods when bats are active, not in torpor, and not caring for non-mobile young.	Suitable habitat for bats	**Before construction:** Pre-construction surveys are conducted by a qualified biologist within suitable bat habitat **During construction:** (1)Tree removal is timed per the measure or bat eviction is implemented per the measure prior to tree removal and (2) No disturbance buffers for maternity bat roosts are defined and monitored by a qualified biologist. **After construction:** N/A

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Removal of trees requires the following two-step process prior to trimming/removal: • On Day 1 under the supervision of a qualified bat biologist, Step 1 would include branches and limbs with no cavities removed by hand (e.g., using chainsaws).This would create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree would either abandon the roost immediately (rarely) or, after emergence, would avoid returning to the roost. • On Day 2, Step 2 of the tree removal may occur, which would be removal of the remainder of the tree.Trees that are only to be trimmed and not removed would be processed in the same manner; if a branch with a potential roost must be removed, all surrounding branches would be trimmed on Day 1 under supervision of a qualified bat biologist and then the limb with the potential roost would be removed on Day 2. **Construction Monitoring**. If a colonial or solitary maternity roost was located, tree/structure removal will be avoided between April 15 and August 15 (the maternity period) to avoid impacts to active maternity roosts (reproductively active females and dependent young). If bats are present, but no dependent young bats are present within the structure for removal, an eviction plan shall be prepared by a qualified biologist and submitted to CPUC and CDFW for review. A 100-foot no disturbance buffer around active roost and monitoring of the no-disturbance buffer by a qualified biologist will be provided. Unless restricted by the qualified biologist, construction vehicles will be allowed to move through a buffer area with no stopping or idling.The qualified biologist will determine, evaluate, and modify buffers as appropriate based on species tolerance and behavior in consultation with CDFW, the potential disruptiveness of construction activities, and existing conditions. Furthermore, the roost will be monitored to determine activity. Roost monitoring will be conducted by qualified biological monitors with		

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knowledge of bat behavior under the direction of a CDFW qualified bat biologist.The qualified biological monitor will observe and document implementation of appropriate buffer areas around active roost(s) during project activities.		
Mitigation Measure Biology-16: Compensatory Mitigation for Sensitive Natural Communities, Riparian, and Wetlands The project shall avoid and/or minimize impacts on waters, wetlands, sensitive habitats, and riparian habitats including ephemeral waters that occur within the Project area to the maximum extent feasible. All grading, fill, staging of equipment, infrastructure construction or removal, and all other construction activities shall be designed, sited, and conducted outside of state and federally jurisdictional waters, wetlands, and riparian habitat to the maximum extent feasible. The implementation of appropriate Best Management Practices (BMPs) (e.g., silt fencing, straw wattles, secondary containment, avoiding fueling in close proximity to waters, etc.) shall be utilized to ensure that indirect impacts to waters, wetlands and riparian areas are avoided or minimized to the maximum extent feasible. BMPs are also necessary to reduce the risk of an unintended release of sediments or other materials into jurisdictional waters. New and upgraded roadways will use at-grade type stream crossings where possible. Stockpiled and bermed sediment will be redistributed or removed from the site so as not to cause water impoundment or induce hydromodification. New poles will be sited outside stream channels to the extent possible. Permanent impacts on sensitive natural communities, riparian habitat, and wetlands shall be compensated through on-site or off-site enhancement or establishment of equivalent or higher value sensitive natural community, riparian areas, or wetlands. Permanent impacts on sensitive natural	Areas of permanent impacts to sensitive natural communities, riparian areas, and wetlands	**Before construction:** (1) SCE prepares mitigation plan for unavoidable impacts to sensitive natural communities, riparian areas, and wetlands including proposed methods of mitigation and location of mitigation in addition to the specifics identified in the measure. **During construction:** Habitat enhancement or creation mitigation is implemented. **After Construction:** Mitigation habitats replace the functions and values of the impacted habitats as evidenced by annual monitoring reports submitted to the CPUC and appropriate regulatory agencies.

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communities, riparian areas, or wetlands habitat shall be compensated through enhancement of comparable vegetation communities, riparian habitat, or wetlands at a minimum 2:1 ratio (enhancement: impact) or creation of comparable habitat at a minimum 1:1 ratio. Mitigation credits may be purchased from a CDFW, USACE,,and/or RWQCB-approved mitigation bank if on-site mitigation is not feasible. If SCE conducts mitigation through habitat enhancement or creation, a sensitive natural community, riparian and wetland mitigation plan shall be prepared at least 30 days prior to permanent impacts that address the following parameters: • Baseline conditions within the mitigation site • Proposed mitigation site conditions • Mitigation methods (e.g., habitat creation or enhancement) • Planting plan • Methods for invasive weed control • Methods to establish the desired mitigation site conditions • Maintenance, including trash removal, invasive weed removal, and repair of any damage to the mitigation site • Adaptive management procedures • Monitoring methods The enhanced or created sensitive natural community, riparian, and wetland habitats shall meet the following performance criteria: • Minimum of 70 percent vegetated cover with the target vegetation community that is being mitigated for (sensitive natural community, riparian, or wetlands) • Less than 3 percent invasive weed cover		

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• Wetland hydrology and soil conditions in the compensatory wetland mitigation areas Annual monitoring shall be conducted for the mitigation of habitats and shall include surveys for native vegetation cover, photo documentation at defined photo-monitoring locations, and monitoring for invasive species and any other habitat stressors. Monitoring will be conducted for the first 5 years or until performance criteria are met. If performance criteria are not met after 5 years, additional mitigation shall be provided so that all permanent impacts are fully mitigated. An annual report shall be submitted by January 31st following the reporting year.The annual report shall provide the results of annual habitat monitoring, recommendations for any corrective actions needed to meet success criteria, and a description of any corrective actions taken in the previous reporting year.The annual monitoring report shall be submitted to CPUC and CDFW, RWQCB, and USACE as appropriate		
Mitigation Measure Biology-17: Protected Tree Removal Mitigation Removal of oak trees and protected trees within the San Andreas SEA will be minimized to what is required to implement the Project. For removal of any protected trees within the San Andreas SEA, oak trees greater than 6 inches dbh, or oak trees with multiple trunks with a cumulative dbh greater than 12 inches, SCE will provide replacement plantings for the protected trees or oak trees at a 3:1 ratio with three trees planted for each tree removed. Prior to tree planting, a restoration consultant shall evaluate the planting area(s) to ensure the location has adequate soil and hydrologic conditions to support successful planting of the tree species. Monitoring of replacement trees including tree health and height shall be conducted annually for a period of three years after mitigation planting with annual monitoring reports submitted to the CPUC by January 31 of each year.	All Project areas where qualifying oak tree or protected tree removal occurs	**Before construction:** SCE identifies all qualifying oak trees and protected trees that may be impacted with work areas and access routes. **During construction:** (1) SCE documents all qualifying oak trees and protected trees that are removed; (2) SCE defines locations for replacement of trees or purchases mitigation credits as applicable; and (3) Protected trees are replaced at a 3:1 ratio for replanting or 4:1 ratio for preservation. **After construction**: Conduct annual monitoring and maintenance and submit annual monitoring reports.

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Maintenance shall be conducted at the tree planting sites for three years to ensure effectiveness of the tree replacement efforts. If replacement trees are not successful, additional trees shall be planted to replace the trees that have died or are not growing. Alternatively, SCE may mitigate through off-site compensation of oak woodland habitats and off-site compensation of SEA protected trees, as applicable or nest mitigation with other species mitigation . Off-site compensation may include the permanent protection of an off-site population of oak trees or protected trees with preservation of four oak trees or otherwise protected trees for every oak tree or protected tree removed.		
CULTURAL RESOURCES		
APM CUL-2: Avoid Environmentally Sensitive Areas (ESA). SCE will perform cultural resource surveys for any portion of the proposed project APE/API not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Cultural resources discovered during surveys will be subject to APM CUL-1 (Develop CRMP). Where operationally feasible, all NRHP- and CRHR-eligible resources will be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/historical resources will be avoided by all project construction, operation and maintenance, and restoration activities, where feasible. Avoidance measures will include, but not be limited to, fencing off ESAs for the duration of the proposed project or as outlined in the CRMP.	Environmentally Sensitive Areas	**Before construction:** Pre-construction surveys for areas not surveys; **During construction:** Avoidance measures are implemented, including fencing off Environmentally Sensitive Areas (ESAs) **After construction:** N/A
APM CUL-3: Conduct Construction Monitoring. Archaeological monitoring will occur as outlined in the CRMP. Archaeological monitoring will be conducted by a qualified archaeologist familiar with the types of historic and prehistoric resources that could occur within the project areas. The qualifications of the principal	All Project areas	**Before construction:** Adequate personnel are identified for the cultural resources specialist/archaeologist **During construction:** (1) Work within 100 feet of discovered resources stops; (2) The required

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archaeologist and monitors will be approved by the CPUC. Monitoring reports will be submitted to the CPUC on a monthly basis. ATribal Participant may be required at culturally sensitive locations in consultation with the CPUC and/or as outlined in the CRMP.		personnel and agencies are notified; (3) Adequate reporting and documentation occurs; (4) Significant resources are completely avoided or mitigated from impacts; and (5) Work only resumes near the resource after required procedures are complete, to the satisfaction of CPUC. **After construction:** N/A
APM CUL-4: Properly Treat Human Remains. SCE will follow all federal and state laws, statutes, and regulations that govern the treatment of human remains. All work in the vicinity of a find will cease within a 200-foot radius of the remains, the area will be protected to ensure that no additional disturbance occurs. Should inadvertent discovery of human remains be made on federal lands, the federal agency and county coroner (California Health and Safety Code 7050.5(b)) will be notified immediately. If the remains are determined to be Native American or if Native American cultural items pursuant to the Native American Graves Protection and Repatriation Act (NAGPRA) are uncovered, the remains will be treated in accordance with the provisions of NAGPRA (43 CFR 10), AB-275, Native American Cultural Preservation, and the Archaeological Resources Protection Act (43 CFR 7). SCE will assist and support the federal agency, as appropriate, in all required NAGPRA, AB-275 and Section 106 actions, government to-government and consultations with Native Americans, agencies, and consulting parties as requested by the federal agency. If the remains are not on federal land, the county coroner and CPUC will be notified immediately and the remains will be treated in accordance with Health and Safety Code Section 7050.5, CEQA Section 15064.5(e), and Public Resources Code Section 5097.98. If the county coroner identifies the	All Project areas	**Before construction:** Personnel are trained on procedures for discovery of human remains **During construction:** N/A **After construction**: N/A

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remains are Native American, they will notify the California Native American Heritage Commission (NAHC) within 24 hours. If the remains are not believed to be Native American, the appropriate local law enforcement agency will be notified.The NAHC will immediately notify the person or tribe it believes to be the most likely descendant (MLD) of the remains, and the MLD has 48 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the human remains and any associated grave goods. If the MLD does not make recommendations within 48 hours, the remains will be reinterred in the location they were discovered, and the area of the property will be secured from further disturbance. If there are disputes between the landowner and the MLD, the NAHC will mediate the dispute and attempt to find a solution. If the mediation fails to provide measures acceptable to the landowner, the landowner or their representative will reinter the remains and associated grave goods and funerary objects in an area of the property secure from further disturbance.The location of any reburial of Native American human remains will not be disclosed to the public and will not be governed by public disclosure requirements of the California Public Records Act, Cal. Govt. Code § 6250 et seq., unless otherwise required by law. SCE will assist and support the CPUC and NAHC, as appropriate.		
APM CUL-5: Cultural Resources Awareness Worker Training. Prior to initiating construction, all construction personnel will be trained by a qualified archaeologist regarding the recognition of possible buried cultural resources (i.e., prehistoric and/or historical artifacts, objects, or features) and paleontological resources (i.e., fossils), and protection of these resources during construction.Training will also inform all construction personnel of the procedures to be followed upon the discovery of cultural materials. All personnel will be instructed that unauthorized removal or collection of artifacts is a violation of federal and	All Project areas	**Before construction:** The cultural resource training material is submitted to the CPUC at least 30 days before construction. **During construction:** Workers receive the CPUC-approved cultural resource training prior to working on the site. **After construction**: N/A

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state laws. Any excavation contract (or contracts for other activities that may have subsurface soil impacts) will include clauses that require construction personnel to attend a Workers Environmental Awareness Training Program (WEAP). The WEAP will include the project's potential for the post-discovery review of archaeological deposits, how to operate adjacent to and avoid all ESAs, and procedures to treat post-discovery reviews.		
Mitigation Measure Cultural- 1: Development of a Cultural Resources Management Plan SCE will prepare and submit for approval a Cultural Resource Management Plan (CRMP) to guide all cultural resource management activities during project construction. Management of cultural resources will follow all applicable federal and state standards and guidelines for the management of historic properties/historical resources, including as identified or determined through the Section 106 review process. The CRMP will be submitted to the CPUC for review and approval at least 90 days prior to the start of construction. The CRMP will be prepared by a qualified archaeologist who meets the Secretary of Interior's standards for archaeology and include, but not be limited to, the following sections: • **Cultural Resources** Management Plan: The CRMP will define and map all known NRHP- and CRHR-eligible properties in or within 100 feet (30.5 meters) of the proposed project APE/API. A cultural resources protection plan will be included that details how NRHP- and CRHR-eligible properties will be avoided and protected during construction. Avoidance and preservation of eligible properties in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context is the preferred method of mitigation and shall be implemented wherever feasible. Measures will include, at a minimum, designation and marking of Environmentally Sensitive Areas	Environmentally Sensitive Areas	• **Before construction:** Personnel training is conducted and Environmentally Sensitive Areas (ESAs) are designated and marked. • **During construction:** Archaeological monitoring and reporting is condcuted. • **After construction:** N/A

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(ESAs), archaeological monitoring, personnel training, and reporting.The plan will also detail which avoidance measures will be used, where and when they will be implemented, and how avoidance measures and enforcement of ESAs will be coordinated with construction personnel. • **Cultural Resource Monitoring and Field Reporting**:The CRMP will detail procedures for archaeological monitoring andTribal participation, define the reporting matrix, and establish criteria for when the monitoring effort should increase or decrease if monitoring results indicate that a change is warranted.The CRMP will also include guidelines for monitoring in areas of high sensitivity for the discovery of buried NRHP- and/or CRHR eligible cultural resources, burials, cremations, tribal cultural resources, or sacred sites. • **Unanticipated Discovery Protocol**:The CRMP will detail procedures for temporarily halting construction, defining work stoppage zones, notifying stakeholders (e.g. agencies, Native Americans, utilities), and assessing NRHP and/or CRHR eligibility in the event unanticipated discoveries are encountered during construction. It will include methods, timelines for assessing NRHP and/or CRHR eligibility, formulating mitigation plans, and implementing treatment. Mitigation and treatment plans for unanticipated discoveries will be reviewed by tribal stakeholders and approved by the CPUC, prior to implementation. • **Data Analysis and Reporting**:The CRMP will detail methods for data analysis in a regional context, reporting of results within one year of completion of field studies, curation of artifacts and data (maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by CPUC, and dissemination of reports to appropriate repositories.		

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GEOLOGY, SOILS AND PALEONTOLOGY		
APM PAL-1: Develop Paleontological Resource Mitigation and Monitoring Plan. SCE will prepare a Paleontological Resources Mitigation and Monitoring Plan (PRMMP) to guide all paleontological management activities during project construction.The PRMMP will be submitted to the CPUC for review and approval prior to the start of construction.The PRMMP will be prepared by a qualified paleontologist, based on Society of Vertebrate Paleontology (SVP) 2010 guidelines, and meet all regulatory requirements. The qualified paleontologist will have a Master's degree or Ph.D. in paleontology, have local paleontology knowledge, and will be familiar with paleontological procedures and techniques.The PRMMP will include, but not be limited to, the following sections: • Paleontological Resource Monitoring and Reporting: Detail monitoring procedures and methodologies, which will require a qualified paleontological monitor for all construction-related ground disturbance that reach approximate depths for significant paleontological resources in sediments with moderate (PFYC 3a) to very high (PFYC 5) and Unknown sensitivity. Sediments of undetermined sensitivity will be monitored on a part-time basis as outlined in the PRMMP. Sediments with very low or low sensitivity will not require monitoring. Paleontological monitors will meet standard qualifications per the SVP (2010). • Unanticipated Discovery Protocol: Detail procedures for halting construction, defining work stoppage zones, notifying stakeholders, and assessing the paleontological find for scientific significance. If indicators of potential microvertebrate fossils are found, screening of a test sample will be carried out as outlined in SVP 2010.	Sediments with moderate (PFYC 3a) to very high (PFYC 5) and unknown sensitivity	**Before construction:** SCE prepares Paleontological Resource Mitigation and Monitoring Plan. **During Construction:** Monitoring and reporting is conducted. **After Construction:** N/A

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• Data Analysis and Reporting: Detail methods for data recovery, analysis in a regional context, reporting of results within one year of completion of field studies, curation of all fossil specimens in an accredited museum repository approved by the CPUC, and dissemination of reports to appropriate repositories.		
APM PAL-2: Paleontology Resources Awareness Training. Prior to the initiation of construction, all construction personnel will be trained regarding the recognition of possible buried paleontological resources (i.e., fossils) and protection of all paleontological resources during construction. Training will inform all construction personnel of the procedures to be followed upon the discovery of paleontological materials. All personnel will be instructed that unauthorized removal or collection of fossils is a violation of Federal and State laws. Any excavation contract (or contracts for other activities that may have subsurface soil impacts) will include clauses that require construction personnel to attend a Worker's Environmental Awareness Training Program (WEAP). The WEAP will include the project's potential for inadvertently exposing buried paleontological resources, how to operate adjacent to and avoid any potential Environmentally Sensitive Area, and procedures to treat unanticipated discoveries.	N/A	**Before construction:** The training program materials are submitted to the CPUC 30 days prior to construction **During construction:** All project personnel undergo the training **After construction:** N/A
APM PAL-3: Conduct Paleontology Resources Construction Monitoring. Paleontological monitoring will be conducted by a qualified paleontologist familiar with the types of resources that could occur within the project area. The qualifications of the principal paleontologist and monitors will be approved by the CPUC. Monitoring reports will be submitted to the CPUC on a monthly basis.	Qualifying excavation within geologic units that have a moderate or high paleontological sensitivity	**Before construction:** N/A **During construction:** (1) Construction activities are monitored where qualifying excavation occurs and (2) Monitoring activities are documented and reported adequately **After construction:** N/A

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Mitigation Measures Geology-1: Geotechnical Hazards Where geotechnical hazards are found to occur, including risk of fault rupture, seismic ground shaking, liquefaction, and landslides, appropriate engineering design and construction measures shall be incorporated into the final project designs, as deemed appropriate by a California licensed Geotechnical Engineer or Certified Engineering Geologist. Design measures that would mitigate seismic and landslide-related impacts shall include, but are not limited to, retaining walls, removal of unstable materials, and avoidance of highly unstable areas. If highly plastic clay soil is unexpectedly encountered at shallow depths during subsequent soil investigations or during construction, the potential for soil expansion shall be evaluated and accounted for in design and construction. Disturbed (due to grading or construction) and engineered slopes shall be monitored by qualified construction personnel on an occasional basis (bi-monthly or as needed) until the slope is fully stabilized and no longer poses an increased risk of failure or erosion as compared to similar undisturbed slopes in the immediate vicinity. More detailed studies to quantify the potential for landslides and rockfall in areas with high landslide susceptibility, as well as shallow groundwater and liquefiable soils, should be considered during a subsequent stage of design.The analysis should consider the effect of earthquake-related ground motions.The studies should recommend measures to mitigate or eliminate the hazard, which may include: • Moving the Project alignment or structure locations. • Use of longer spans and/or different structures to avoid placing structures in higher hazard areas. • Founding structures on deep foundations adequate to withstand the hazard.	All Project areas that are suspected to have unstable soils or landslide susceptibility, underlain by a fault, expansive soils, or areas that could be subject to strong ground shaking and ground failure	**Before construction**: Geotechnical recommendations are incorporated into final design. **During construction**: Seismic and landslide-related impacts are mitigated by Project design measures. **After construction:** Disturbed and engineered slopes are monitored until fully stabilized.

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• Mitigating the potential for landslide on the slope. • Fences, screens, or other barriers to protect structures from rockfall or landslides.		
Mitigation Measure Geology-2: Structures within Alquist- Priolo Fault Zones SCE shall adhere to recommendations outlined in the Geotechnical Investigation Report to prevent damage to structures from fault ruptures. Structures located directly on or adjacent to a fault may be at a higher risk for damage during a seismic event due to surface rupture of the fault.The following measures shall be considered to reduce the potential for damage due to fault rupture for structures located within the Alquist-Priolo zones or structures that will span Alquist-Priolo zones: • Move the structures so that they are not located in Alquist-Priolo zones or away from active fault traces if structures must be placed in an Alquist-Priolo zone. • The alignment could be modified so that fault crossings are perpendicular to the fault to reduce the potential change in loading on the structure(s) and lines. • Structures capable of spanning across faults and/or fault zones could be used to reduce the potential for foundation damage or failure. • Use more robust structures and/or structure foundations (including ground improvement) near faults to reduce the potential for damage due to changes in structure loading from fault movement. If specific structures must be located within Alquist-Priolo zones, additional fault studies may be needed to confirm structure foundations do not span an active surface fault.	Structures located within Alquist-Priolo fault zones.	**Before construction:** N/A **During construction:** The Project alignment is be modified or reinforced in fault zones to reduce potential for damage. **After construction:** N/A

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
HAZARDS AND HAZARDOUS MATERIALS		
APM HAZ-1: Prepare a Hazardous Materials Management Plan SCE will prepare and implement a Hazardous Materials Management Plan (HMMP)/Hazardous Materials Business Plan (HMBP) during project construction.The plan will outline proper hazardous materials handling, use, storage and disposal requirements, as well as hazardous waste management procedures.This plan will be developed to ensure that all hazardous materials and wastes will be handled and disposed of according to applicable rules and regulations. The HMMP will address the types of hazardous materials to be used during the project, hazardous materials storage, employee training requirements, hazard recognition, fire safety, first aid/emergency medical procedures, hazardous materials release containment/control procedures, hazard communication training, PPE training, and release reporting requirements. It will also include fueling and maintenance procedures for helicopters and construction equipment. If on-site refueling is necessary, BMPs shall be implemented in accordance with the project SWPPP. Refueling stations and fuel tanks will be located, maintained, and operated during construction in accordance with applicable laws and regulations pertaining to hazardous materials. If more than 1,320 gallons of petroleum products in containers greater than 55-gallons, a SPCC plan must be created prior to products being brought on-site. All construction personnel, including environmental monitors, will be made aware of local, state and federal emergency response reporting guidelines for accidental spills.	Entire Project area	**Before construction:** Hazardous Materials Management Plan is submitted to the CPUC for review and approval at least 30 days prior to construction. **During construction:** (1) Workers receive hazardous materials management training and (2) BMPs are maintained on site. **After construction:** N/A

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
APM HAZ-2: Prepare a Soil Management Plan. A Soil Management Plan will be developed and implemented for the proposed project.The Soil Management Plan will provide guidance for the proper handling, on-site management, and disposal of impacted soil that may be encountered during construction activities.The Soil Management Plan will direct that during grading or excavation work, the construction contractor shall observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, potentially contaminated soil will be segregated, sampled, and tested to determine appropriate treatment and disposal options. Work in the area of the potentially contaminated soil will be stopped until appropriate measures are determined based on the testing results and are taken to protect human health and the environment. If the soil is classified as hazardous, it will be properly managed on location and transported in accordance with the U.S. Department ofTransportation regulations using a Uniform Hazardous Waste Manifest to a Class I Landfill or other appropriate soil treatment or recycling facility. If potentially-contaminated groundwater is encountered, then groundwater samples will be collected and tested to determine appropriate treatment and disposal. Hazardous materials will be transported and disposed of in accordance with applicable rules, regulations, and SCE standard protocols designed to protect the environment, workers, and the public.	Entire Project area	**Before construction:** Soil Management Plan is submitted to the CPUC for review and approval at least 30 days prior to construction. **During construction:** (1) Workers receive training to identify contaminated soils and groundwater, and (2) Proper soil and groundwater testing and disposal is conducted. **After construction:** N/A
APM HAZ-3: Prepare and Implement a Project-Specific Fire Management Plan. A Fire Prevention and Emergency Response Plan will be developed to ensure the health and safety of construction workers, SCE personnel, and the public during Project construction.The Plan shall cover: • The purpose and applicability of the plan	Entire Project area	**Before construction:** Construction Fire Management Plan is submitted to the CPUC for review and approval at least 30 days prior to construction.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
• Responsibilities and duties • Project areas where the plan applies • Procedures for incorporating Red Flag Warnings, Fire Potential Index (FPI), Project Activity Level (PAL), and equivalent indicators in determining fire weather related work restrictions • Procedures for fire reporting, response, prevention, and evacuation routes • Coordination procedures with federal and local fire officials • Crew training, including fire safety practices and restrictions • Fire suppression and communication equipment required to be on hand during construction • Method for verification that Plan protocols and requirements are being followed • Post-construction fire prevention and response measures The Project-specific Fire Prevention and Emergency Response Plan for construction of the project will be prepared by SCE and submitted to CPUC, CALFIRE, Kern and Los Angeles counties, and local municipal fire agencies for review at least 30 days prior to initiation of construction. SCE will address all comments received from reviewing agencies and provide the final Fire Prevention and Emergency Response Plan to reviewing agencies for approval prior to initiating construction activities.		**During construction:** (1) Workers receive fire prevention training and (2) Fire prevention tools and water are maintained on site. **After Construction:** N/A
HYDROLOGY AND WATER QUALITY		
Mitigation Measure Hydrology-1: Culvert and Bridge Design SCE shall design any repaired or replaced culverts and bridges to meet the standards outlined in the Kern County Development Standards for Drainage (Kern County Public Works, Division Four). At a minimum, all culverts shall be a minimum of 18 inches in diameter and designed to avoid	Any repaired or replaced culverts or bridges	**Before construction:** N/A **During construction:** SCE designs culverts and bridges needing installation or repair to meet Kern County Development Standards for Drainage. **After construction:** N/A

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
any increase in flooding or erosion on adjacent stream banks or slopes. Design features for both culverts and bridges shall include those that prevent impediment of flood waters, including both 10-year and 100-year events.The culvert and/or bridge designs shall be provided to Kern County for review, and any approvals shall be obtained prior to construction. Any Kern County comments or approvals for the culvert or bridge design shall be submitted to the CPUC for record keeping.		
Mitigation Measure Hydrology-2: Structures within Flood Hazard Zones SCE shall adhere to recommendations outlined in the Geotechnical Investigation Report to prevent damage to structures from flooding. A detailed scour analysis should be performed during design for each structure to be placed in a location with a potential for contact with surface water – inside or outside of the floodplain.The ground surface should be sloped away from each proposed structure to the extent practical. Structure foundations that will be exposed to channelized surface water may need: • To be supported on a deep foundation that extends beyond the depth of potential scour; or • Armoring or other soil reinforcement at the ground surface to lower the potential for foundation undermining	Structures within flood hazard zones	**Before construction:** SCE performs a detailed scour analysis for structures that may come into contact with floodwater. **During construction:** SCE designs structures in accordance with recommendations in the Geotechnical Investigation Report. **After construction:** N/A
NOISE		
APM NOI-1: Noise Disturbance Minimization Procedures. SCE will employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors during construction: • Construction activities will be confined to daytime, weekday and weekend hours established by the applicable local jurisdiction. In the	All Project areas within 500 feet of noise sensitive receptors	**Before construction:** (1) Receptors within 500 feet are provided adequate notice; (2) Construction Noise Coordinator is designated; and (3) Noise complaint phone number is adequately posted at key work areas.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
event construction is required beyond those hours, SCE will notify the appropriate local agency or agencies regarding the description of the work, location, and anticipated construction hours. • Construction equipment will use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. • Construction traffic and helicopter flight will be routed away from residences and schools, where feasible. Unnecessary construction vehicle use, and idling time will be minimized. If a vehicle is not required for use immediately or continuously for construction activities, its engine will be shut off.		**During construction:** (1) Equipment is equipped with mufflers and adequately maintained; (2) Stationary equipment is positioned appropriately and equipped with engine-housing enclosures; (3) Loud construction activities are scheduled outside of sensitive periods to the extent practicable; and (4) Noise complaints are adequately addressed and reported to CPUC **After construction:** N/A
Mitigation Measure Noise-1: Coordination with El Tejon School At least 90 days prior to construction at El Tejon School, SCE shall coordinate with El Tejon School to schedule power line construction activities within 1,000 feet of the school to occur when school is not in session (e.g., during holiday or summer breaks). The power line construction activities include roadwork,TSP foundation,TSP haul,TSP assembly,TSP erection, LWS pole haul, LWS pole assembly, LWS pole installation, existing pole removal, existing lattice structure/TSP removal, guard structure installation, and guard structure removal. If power line construction activities within 1,000 feet of El Tejon School need to occur when school is in session, SCE shall provide instructions to El Tejon School on how to reduce impacts of the noise at El Tejon School during construction activities, such as closure of doors and windows, and scheduling of school activities that would minimize effects of construction noise when school is in session.	Work areas within 1,000 feet of El Tejon School and staging area adjacent to El Tejon School	**Before construction:** Construction schedule is coordinated with El Tejon School for construction activities that would be within 1,000 feet of El Tejon School. Construction activities that are expected to exceed 70 dB at the El Tejon School include but are not limited to roadwork, TSP foundation,TSP haul, TSP assembly,TSP erection, LWS pole haul, LWS pole assembly, LWS pole installation, existing pole removal, existing lattice structure/TSP removal, guard structure installation, and guard structure removal.The nearest and loudest construction activities are scheduled when school is not in session to the extent possible. **During construction**: SCE coordinates schedules to minimize construction activities that are scheduled to occur within 1,000 feet of El Tejon School when school is in session.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
		After construction: N/A
Mitigation Measure Noise-2: Resident Notification and Noise Suppression Measures for construction noise For construction within Los Angeles County expected to exceed 75 dB at sensitive receptors, SCE shall notify affected residences within 1,000 feet of construction areas at least 10 days in advance of the construction activity. SCE shall also employ noise-control techniques to reduce construction noise exposure in proximity of sensitive receptors. Noise control techniques shall include: • Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. • Stationary noise sources (e.g., generators, pumps) and staging areas shall be shielded from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts. • Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible. • Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.	Residences next to the Gorman substation and within 1,000 feet of construction work areas, including staging areas, in Los Angeles County	**Before construction:** Residents within 1,000 feet of any proposed construction activities in Los Angeles County are notified at least 10 days in advance of construction activities. **During construction:** Sound barrier or sound blankets (rated STC 27 or greater) are installed between the residence and work at the Gorman substation and the staging area, noise suppression measures are employed during construction and provide alternative lodging if desired by residents within 500 feet of proposed nighttime construction activities in Los Angeles County. **After construction:** N/A

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
• Offer temporary relocation to residents within 500 feet of nighttime construction areas.		
Mitigation Measure Noise-3: Helicopter noise control strategy As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to minimize impact to noise-sensitive receptors on the ground.	Construction activities at the Gorman substation and staging area across I-5 from the Gorman substation	**Before construction**: Noise control strategy is developed, reviewed, and approved prior to construction. **During construction:** NA **After construction:** N/A
RECREATION		
Mitigation Measure Recreation-1: Fort Tejon State Park SCE shall notify the Fort Tejon State Park of the location, timing, and duration of all construction activities within the Fort Tejon State Park parking area at least 60 days prior to construction in the area. SCE shall also post notices within the parking area at least 14 days prior to planned construction activities. The notices shall notify the location, date, and time of any impacted access to the parking area and potential alternative parking locations. During construction within the Fort Tejon State Park parking area, SCE shall utilize flaggers to maintain safe vehicle and pedestrian access to the parking area to the extent feasible. SCE shall photo document the existing condition of all work areas within the Fort Tejon State Park parking area. SCE shall repair any damage to pavement or other facilities within the Fort Tejon State Park parking area to pre-construction conditions. SCE shall photo document the post-construction conditions of the parking area after construction is complete.	Fort Tejon State Park and parking area	**Before construction:** Recreationists (the public) and State Park are notified of construction 14 days and 60 days, respectively, prior to construction. **During construction**: N/A **After construction**: Any damage to the parking area is repaired to match pre-construction conditions; provide photographs pre and post construction.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
TRANSPORTATION		
APMTRA-1 SCE will implement traffic control measures consistent with those published in the Manual on Uniform Traffic Control Devices, as written and amended by Caltrans for the state of California (CA MUTCD) and using standard templates from the California Temporary Traffic Control Handbook (CATTCH) (California Inter-Utility Coordinating Committee 2018). These measures will be implemented as and where necessary as described in the CA MUTCD and/or CATTCH, or in ministerial permits.	All public roadways	**Before construction**: N/A **During Construction:** Traffic control measures are implemented. **After construction**: N/A
APMTRA-2 Prior to construction, SCE will consult with the FAA regarding helicopter flight plans that will take place during construction. This consultation will include, but not be limited to: • Providing locations of helicopter construction staging and work areas. • Establishing designated flight corridors between staging and work areas • Means to ensure external load operations avoid occupied structures and roadways. • Locations of traffic control where external load operations will cross public roadways. • Locations where Congested Area Plans may be required for filing with the FAA. • Identifying any flight restrictions recommended/required by the FAA. The results of this coordination will be provided to the CPUC.	All Project areas	**Before construction:** SCE consults with FAA. **During construction:** Flight plan measures are implemented. **After construction:** N/A
APMTRA-3 Where the proposed project work area encroaches upon a public right-of-way and reduces the existing pedestrian path of travel to less than 48	Public rights-of- way with existing pedestrian paths	**Before construction:** N/A **During construction:** Alternate pedestrian routes are provided.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
inches wide, alternate pedestrian routing will be provided during construction activities.		**After construction:** N/A
Mitigation Measure Transportation-1: Transit Notification Notification shall be given to the relevant local transit agency no less than 60 days prior to construction within 20 feet of any bus stop or detours of any bus route. The notification shall include the following: • The location and timing of construction activities within proximity to the bus stop • The location and timing of road closures along the bus route(s) and proposed detours • The affected bus route(s) and bus stop(s) • Name and contact information for a responsible individual who can address any questions and meet with the transit agency to resolve any conflicts with bus operations	Project areas that could affect bus routes	**Before construction**: Local transit agency is notified no less than 30 days before construction. **During construction**: Signs are posted at affected bus stops no less than 7 days before closures. **After construction:** N/A
Mitigation Measure Transportation- 2: Roadway Damage SCE shall conduct a Pre-Construction Road Condition Assessment along roadways adjacent to all staging areas to document any existing roadway damage to the asphalt or concrete curbs. SCE shall submit photos and coordinates of any existing roadway damage to the CPUC, Caltrans, and Kern County no less than 30 days prior to construction. If roadways adjacent to staging areas are damaged by construction activities, the damaged area(s) shall be documented and repaired no more than 60 days following construction activities. If the damage could cause a substantial transportation hazard, the location shall be marked appropriately and repaired within 48 hours. Any roadway damages shall be repaired to pre-project conditions and following applicable Caltrans and Kern County repair standards.	Public roadways where construction would occur	**Before construction:** Existing roadway damages are assessed and SCE submits documentation to the CPUC, Caltrans, and Kern County no less than 30 days prior to construction. **During construction:** Any roadway damage that could cause a substantial traffic hazard is marked and repaired within 48 hours. **After construction**: Any roadway damage that would not cause a substantial traffic hazard is repaired no more than 60 days after construction.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
Mitigation Measure Transportation- 3: Notify Emergency Personnel of Road Closures SCE shall notify local emergency personnel (i.e., fire departments, police departments, ambulance, and paramedic services) at least 1 week prior to lane or road closures.The notice shall include location(s), date(s), time(s), and duration of closure(s) and a contact number for SCE Project personnel.	All Project areas	**Before construction:** Emergency service providers are notified of lane closures and detour routes no less than 1 week before any lane or road closures. **During construction:** N/A **After construction:** N/A
TRIBAL RESOURCES		
APM TCR-2: Tribal Engagement Plan. A tribal engagement plan shall be prepared, which will detail how Native American tribes will be engaged and informed throughout the proposed project.The tribal engagement plan will be included in the CRMP (MM Cultural-1).	N/A	**Before construction:** SCE preparesTribal Engagement Plan and provide to CPUC for review. **During construction:** N/A **After construction:** N/A
Mitigation Measure Tribal-1: Native American Monitoring InterestedTribes shall be invited to conduct Native American monitoring during all ground-disturbing activities associated with portions of or the entirety of Segment 3 of the project as outlined in the CRMP. The CRMP shall outline a monitoring program and establish when monitoring is needed and when monitoring can cease based on findings during monitoring.The CRMP shall be provided to Native Americans for review and comment for 30 days. A Native American monitor shall be invited to be onsite daily to coordinate with the archaeological monitors and to provide tribal perspectives in the event a discovery occurs.The Native American monitor shall be free to visit different activity areas throughout the course of a given day, notwithstanding any limitations based on safety concerns. Native American monitors shall be afforded a minimum of 1 weeks' notice prior to the commencement of project-related ground-disturbing activities.	Segment 3	**Before construction**: Native American monitors are notified no less than 10 days before construction. **During construction**: Native American monitors are alerted at the end of each workday whether work activities will be taking place the following day. **After construction: N/A**

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicable location	Performance standard and timing
During project activities, Native American monitors shall be provided with weekly work forecasts to facilitate scheduling of monitors. Because project implementation activities are often unpredictable, there may be changes in work activities. Native American monitors shall be notified by the Construction Contractor of any scheduling changes as soon as possible. The Construction Contractor will use daily field meetings, telephone, and email as methods of communicating work schedules. Native American monitors shall be alerted at the end of each workday whether work activities will be taking place the following day. If cultural resources are encountered, the Native American monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery and a qualified archeologist meeting Secretary of Interior standards, as well as the Native American monitor shall assess the find. SCE shall, in good faith, consult with the Tribes on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.		

APPENDIX A

California Public Utilities Commission Gorman-Kern River 66 kV Project Draft Initial Study/Mitigated Negative Declaration