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Comment Letter to NOP for DEIR for the Prairie Song Reliability Project

Additional submitted attachment is included below.

Los Angeles Regional Water Quality Control Board

March 3, 2026

Lisa Worrall
Senior Environmental Planner
California Energy Commission
715 P Street, MS 40
Sacramento, CA 95814

Dear Ms. Worrall:

RESPONSE TO NOTICE OF PREPARATION OF A ENVIRONMENTAL IMPACT REPORT FOR THE PRAIRIE SONG RELIABILITY PROJECT (25-OPT-02)

Thank you for the opportunity to comment on Prairie Song Reliability Project, LLC's Notice of Preparation (NOP) for Draft Environmental Impact Report (DEIR) for the Prairie Song Reliability Project (project). The proposed project involves the construction of a 1,150-megawatt (MW), approximately 9,200-megawatt hour (MWh), battery energy storage system (BESS) including substation, inverters, communication systems, stormwater retention and infiltration basins, and other related structures. The project would connect to the existing Southern California Edison Vincent Substation installed overhead using monopoles and steel lattice towers and store electricity from the power grid, providing additional capacity to the grid to assist with the peak demand periods.

Our comments are submitted in compliance with CEQA *Guidelines* §15096, which requires *California Environmental Quality Act* responsible agencies to comment on the scope and content of the environmental information germane to their statutory responsibilities and lead agencies to include that information in their DEIR.

The State Water Board and the Regional Water Quality Control Boards (Regional Water Boards) regulate discharges to protect the quality of water of the State, broadly defined as "the chemical, physical, biological, bacteriological, radiological, and other properties and characteristics of water which affects its use"¹. If the proposed project has any of the following discharges, the project proponent is required to obtain a permit from the State or Regional Water Boards:

Discharge Type

- Discharge of dredge and fill materials
- Wastewater discharges

Types of Permits involved

- Clean Water Act (CWA) §401 water quality certification for federal waters; or Waste Discharge Requirements for non-federal waters (including ephemeral waters).
- CWA §402 National Pollutant Discharge Elimination System permit, e.g. storm water permit.

¹ California Water Code, §13050.

Discharge Type

- Other discharges

Types of Permits involved

- Waste Discharge Requirements or other permits for discharges that may affect groundwater quality and other waters of the State, such as operation of proposed solid waste transfer facilities, and other proposed project activities.

Early consultation is encouraged, as project reconfiguration may be required to avoid and minimize impacts to State waters.

1. Impacts to Waters of the State

The project as presented would either permanently or temporary impact two Basin Plan named streams (Santa Clara River Reach 8 and Kentucky Springs Canyon) through the placement and construction of overhead transmission line. The project proponent has noted, in the Biological Resources section, that “ephemeral drainages” maybe impacted. Please include an analysis of these impacts as well as a biological assessment, jurisdictional delineation, and wetland delineation in the DEIR in light of these significant impacts.

We believe avoidance is the best strategy for managing potential water quality impacts. For unavoidable impacts, understanding how pollution pathways will operate is essential to managing them. Impacts to jurisdictional waters should be quantified.

In particular:

- a. Specify the causes, natures, and magnitude of all proposed impacts. Provide a level of analyses commensurate with the size and complexity of the project.
- b. Quantify impacts as definitively as feasible, using appropriate modeling and adequate data. Modeling approaches should be documented; and data deficiencies or other factors affecting the reliability of the results identified and characterized.
- c. Identify whether impacts will be temporary or permanent.

2. Avoidance and Minimization Analysis

The Los Angeles Water Board believes avoidance is the best strategy for managing potential water quality impacts and strongly discourages temporary or permanent impacts to waters of the state when avoidable or minimized whenever possible. Please present an analysis of alternatives considered to minimize impacts to waters of the State to the maximum extent possible and demonstrate how the chosen alternative is the Least Environmentally Damaging Practicable Alternative (LEDPA). Note that issuance of a CWA Section 401 Water Quality Certification may be denied should the project not meet this criterion.

3. Mitigation

If permanent impacts are identified, the DEIR should propose compensatory mitigation for the significant impacts to water quality and beneficial uses related to the placement or

construction of the proposed transmission lines. The compensatory mitigation must ensure that there is no net loss of the overall abundance, diversity, and condition of aquatic resources, based on the watershed profile. Note that the Los Angeles Water Board allows mitigation in the form of establishment, re-establishment, rehabilitation, or enhancement. The Los Angeles Water Board does not accept preservation as compensatory mitigation. If impacts to the channel cannot be avoided, please include the proposed mitigation in the DEIR. Final compensatory mitigation is subject to approval by the Los Angeles Water Board during the CWA Section 401 Water Quality Certification permitting process.

Again, thank you for this chance to comment. We welcome the opportunity to work with you and the project proponent to make this project an example of environmental sustainability in California. If we may clarify any of our comments or be of further assistance, please contact Man Voong at (213) 576-6690 or at Man.Voong@waterboards.ca.gov,

Sincerely,



Elisha Wakefield
Senior Environmental Scientist

cc:

Victoria Tang, Environmental Program Manager
California Department of Fish and Wildlife

Wetlands Regulatory Office
U.S. Environmental Protection Agency, Region 9