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Project Title:	Prairie Song Reliability Project
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Document Title:	Clarification on Jurisdictional vs Non-Jurisdictional Impact Acreages
Description:	N/A
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MEMORANDUM

To:	California Energy Commission Staff
From:	Prairie Song Reliability Project, LLC (Applicant)
Subject:	Clarification of Biological Resource Impacts and Mitigation Responsibilities for Prairie Song Reliability Project (25-OPT-02)
Date:	October 27, 2026
Attachment(s):	Attachment A: Email Correspondence

This memorandum provides the additional biological-resource impact information requested by the California Energy Commission (CEC) in its October 9, 2026, email regarding the Prairie Song Reliability Project (Attachment A). The tables below distinguish impacts associated with the Applicant's interconnection facilities from those associated with Southern California Edison (SCE) to support assignment of the applicable mitigation responsibilities. Applicant impacts include the BESS and portions of the northern and southern gen-tie alignments extending to the point of change of ownership (POCO). SCE impacts include the portions of the northern and southern gen-tie alignments extending from the POCO to the respective points of interconnection (POIs).

The tables summarize potential permanent and temporary impacts to vegetation communities and land covers, potential jurisdictional aquatic resources, Significant Ecological Area (SEA) resources, protected trees, and other sensitive biological resources. Impacts are presented separately for the northern and southern portions of the alignment and for the Applicant and SCE portions of the Project.

This memorandum also clarifies the potential impacts to non-wetland water feature NWW-1c and total impact acreage. Approximately 0.004 acre of NWW-1c is within the BESS permanent-impact footprint, as shown in Table 8. Inclusion of this acreage does not change the previously reported total impact acreage of 0.33 acre. Table 8 also provides the linear feet of impact for each impacted aquatic-resource feature.

Table 1. Impacts to Vegetation Communities and Land Covers in the Study Area

Alliance	Association	CDFW Sensitive[1]	Ranking[2]	Applicant Impacts					SCE Impacts[5] (Gross Acreage)	
				BESS[3] (Gross Acreages)	Northern Gen-Tie[4] (Gross Acreage)		Southern Gen-Tie[4] (Gross Acreage)			
				Permanent	Permanent	Temporary	Permanent	Temporary	Permanent	Temporary
Native Communities										
Cheesebush – sweetbush scrub	*Ambrosia salsola – Larrea tridentata*	No	G4/S4	–	–	–	–	0.05	–	–
	Ambrosia salsola Association	No	G4/S4	–	–	0.54	–	1.57	–	–
Fiddleneck – phacelia fields	*Amsinckia menziesii – Erodium* spp.	No	G5/S5	2.08	–	–	–	–	–	–
California sagebrush – (purple sage) scrub	*Artemisia californica – Eriogonum fasciculatum*	No	G4/S4	–	–	–	–	–	0.08	1.85
Big sagebrush	*Artemisia tridentata – Ericameria nauseosa*	No	G5/S5	0.42	–	1.15	0.46	2.21	–	–
	Artemisia tridentata – Eriogonum fasciculatum	No	G5/S5	2.60	–	–	–	–	–	–
	Artemisia tridentata ssp. *parishii*	Yes	G2/S2	–	–	0.06	–	0.20	–	–
Fourwing saltbush scrub	*Atriplex canescens*	No	G5/S4	0.67	1.24	10.62	1.25	12.66	0.33	8.36
Mormon tea scrub	*Ephedra viridis*	No	G4/S4	17.84	–	–	–	–	–	–
Rubber rabbitbrush scrub	*Ericameria nauseosa – Juniperus californica*/herb	No	G5/S5	10.98	–	0.43	–	1.23	–	–
	Ericameria nauseosa	No	G5/S5	–	–	–	–	–	–	0.87
California buckwheat scrub	*Eriogonum fasciculatum*	No	G5/S5	4.75	–	0.16	–	–	–	–
	Eriogonum fasciculatum var. *foliolosum – Juniperus californica*	Yes	G3/S3	4.32	–	–	–	–	–	–
California buckwheat – Parish's goldeneye scrub	*Eriogonum fasciculatum* rock outcrop	Yes	Unranked	–	–	–	–	–	–	–
California walnut groves	*Juglans californica / annual herbaceous*	Yes	G3/S3	–	–	–	–	–	–	–
California juniper woodland	*Juniperus californica / Adenostoma fasciculatum – Eriogonum fasciculatum*	Yes	Unranked	10.68	–	0.26	0.53	0.35	–	–
	Juniperus californica / herbaceous	Yes	Unranked	7.16	0.39	0.21	–	0.53	0.20	1.50
	Juniperus californica / Eriogonum fasciculatum – Artemisia californica	No	G5/S5	–	–	–	–	–	–	–
			Subtotal:	*61.49*	*1.63*	*13.42*	*2.24*	*18.80*	*0.61*	*12.58*
Naturalized (Non-Native)										
Avena spp. – *Bromus* spp.	*Avena barbata – Bromus hordeaceus*	No	GNA/SNA	–	–	–	–	–	–	–
Bromus rubens – Schismus (*arabicus*, *barbatus*)	*Bromus rubens* – mixed herbs	No	GNA/SNA	–	–	–	–	–	–	1.39

Table 1. Impacts to Vegetation Communities and Land Covers in the Study Area

Alliance	Association	CDFW Sensitive[1]	Ranking[2]	Applicant Impacts					SCE Impacts[5] (Gross Acreage)	
				BESS[3] (Gross Acreages)	Northern Gen-Tie[4] (Gross Acreage)		Southern Gen-Tie[4] (Gross Acreage)			
				Permanent	Permanent	Temporary	Permanent	Temporary	Permanent	Temporary
			Subtotal:	–	–	–	–	–	–	*1.39*
Disturbed habitat	Not applicable	No	NA/NA	6.00	–	3.61	0.36	3.35	–	–
Urban/Developed	Not applicable	No	NA/NA	3.25	0.01	1.06	0.39	1.68	0.01	2.26
			Subtotal:	*9.26*	*0.01*	*4.67*	*0.75*	*5.02*	*0.01*	*2.26*
			Total	**70.74**	**1.65**	**18.09**	**2.98**	**23.82**	**0.62**	**16.23**

Notes: CDFW = California Department of Fish and Wildlife; BESS = battery energy storage system; gen-tie = generation interconnection.
Totals may not sum due to rounding and inclusion of both gen-tie routes.

1 CDFW has determined the community to be sensitive.

2 The conservation status of a vegetation community is designated by a number from 1 to 5, preceded by a letter reflecting the appropriate geographic scale of the assessment (G = global, S = state). The numbers have the following meaning:
1 = critically imperiled
2 = imperiled
3 = vulnerable to extirpation or extinction
4 = apparently secure
5 = demonstrably widespread, abundant, and secure
NA = not applicable
GNA = global rank not applicable
SNA = state rank not applicable
Unranked= Associations that are considered sensitive, but have not been ranked

3 There are no temporary impacts associated with the BESS.

4 Permanent impacts for the gen-tie are for access roads and tower pads.

5 Temporary impacts will occur due to the construction of the two (2) underground fiber optic lines within the Southern Gen-Tie Route corridor, within areas proposed for construction laydown areas for the gen-tie work, within pull areas from stringing the gen-tie, and within other gen-tie work areas that are outside of the transmission pole pads and access roads.

Table 2. Summary of Potential Impacts to Potential Jurisdictional Waters

Jurisdiction	Applicant Impacts					SCE Impacts (Gross Acreage)	
	BESS[3] (Gross Acreages)	Northern Gen-Tie (Gross Acreage)		Southern Gen-Tie (Gross Acreage)			
	Permanent	Permanent	Temporary	Permanent	Temporary	Permanent	Temporary
RWQCB/CDFW							
Features							
Non-Wetland Waters	0.32	0.01	0.16	0.01	0.24	–	0.00
Swales	–	–	0.05	–	0.05	–	–
Total[1]	**0.32**	**0.01**	**0.20**	**0.01**	**0.30**	**–**	**0.00**

1 Totals may not sum due to rounding.

Table 3. Potential Impacts to Special-Status Wildlife Habitat Within the SEA

Species	SEA Resource Category[1]	SEA Preservation Ratio (acres)[1]	Applicant Impacts						SCE Impacts		
			Northern Gen-Tie			Southern Gen-Tie					
			Potential Impacted Habitat (acres)	Restored Temporarily Impacted Habitat (Gross acreage) [2]	Needed Conserved Habitat (Gross acreage) [3, 6]	Potential Impacted Habitat (acres)	Restored Temporarily Impacted Habitat (Gross acreage)[2]	Needed Conserved Habitat (Gross acreage)[3, 6]	Potential Impacted Habitat (acres)	Restored Temporarily Impacted Habitat (Gross acreage)[2]	Needed Conserved Habitat (Gross acreage)[3, 6]
Crotch's bumble bee	1	5:1	14.79[5]	13.16	60.79	20.93[5]	18.70	85.95	11.33[5]	10.80	45.85
California legless lizard	2	4:1	1.18[6]	0.79	3.93	2.53[6]	2.00	8.12	1.65[6]	1.45	5.15
Blainville's horned lizard	2	4:1	14.79[5]	13.16	46.00	20.93[5]	18.70	65.02	11.33[5]	10.80	34.52
loggerhead shrike	2	4:1	14.79[5]	13.16	46.00	20.93[5]	18.70	65.02	11.33[5]	10.80	34.52
greater roadrunner	3	3:1	14.79[5]	13.16	31.21	20.93[5]	18.70	44.09	11.33[5]	10.80	23.19
mountain lion	1	5:1	18.40[7]	16.77[8]	75.23	24.64[7]	22.04[8]	101.16	11.33[7]	10.80[8]	45.85

Notes: SEA = Significant Ecological Area.

1 Los Angeles County Planning 2020.
2 Restoration for areas that are temporary impacts (MM-BIO-6).
3 Total impacts multiplied by the ratio and minus the restored habitat (MM-BIO-5).
4 Acreages are not additive. Conserved habitat needed overlaps since the species share suitable habitat, so the 75.23 acres (Applicant Northern Gen-Tie) or 101.16 (Applicant Southern Gen-Tie) for mountain lion will cover all species.
5 Includes all native habitats impacted, as listed in Table 1.
6 Includes all habitats that support California juniper, as listed in Table 1.
7 Includes all native habitats and disturbed habitat impacted, as listed in Table 1.
8 Includes all restoration of native habitats and disturbed habitats.

Table 4. Potential Impacts to Vegetation Communities and Land Covers Within the SEA

Alliance		SEA Category[1]	Ratio[1]	Applicant Impacts						SCE Impacts		
				Northern Gen-Tie			Southern Gen-Tie					
				Permanent Impacts (gross acreage)	Temporary Impacts (gross acreage)	Total Impacts (gross acreage)	Permanent Impacts (gross acreage)	Temporary Impacts (gross acreage)	Total Impacts (gross acreage)	Permanent Impacts (gross acreage)	Temporary Impacts (gross acreage)	Total Impacts (gross acreage)
Native Communities												
Cheesebush – sweetbush scrub	*Ambrosia salsola – Larrea tridentata*	4	2:1	–	–	–	–	0.05	0.05	–	–	–
	Ambrosia salsola Association	4	2:1	–	0.54	0.54	–	1.57	1.57	–	–	–
California sagebrush – (purple sage) scrub	*Artemisia californica - Eriogonum fasciculatum*	4	2:1	–	–	–	–	–	–	–	1.00	1.00
Big sagebrush	*Artemisia tridentata - Ericameria nauseosa*	4	2:1	–	1.15	1.15	0.46	2.21	2.67	–	–	–
	Artemisia tridentata ssp. *parishii*	4	2:1	–	0.06	0.06	–	0.20	0.20	–	–	–
Fourwing saltbush scrub	*Atriplex canescens*	4	2:1	1.24	10.62	11.86	1.25	12.66	13.91	0.33	8.36	8.68
Rubber rabbitbrush scrub	*Ericameria nauseosa - Juniperus californica* / herb	4	2:1	–	0.37	0.37	–	1.12	1.12	–	–	–
California juniper woodland	*Juniperus californica / Adenostoma fasciculatum - Eriogonum fasciculatum*	3	3:1	–	0.21	0.21	0.53	0.35	0.87	–	–	–
	Juniperus californica / herbaceous	3	3:1	0.39	0.21	0.60	–	0.53	0.53	0.20	1.45	1.65
Land Covers												
Disturbed Habitat	N/A	N/A	N/A	–	3.61	3.61	0.36	3.35	3.71	–	–	–
Urban/Developed	N/A	N/A	N/A	0.01	1.01	1.02	0.39	1.68	2.07	–	0.10	0.10
			Total	**1.65**	**17.78**	**19.42**	**2.98**	**23.72**	**26.70**	**0.53**	**10.90**	**11.43**

Notes: Totals may not sum due to rounding.
[1] SEA Ordinance Implementation Guide (Los Angeles County Planning 2020).

Table 5. Potential Impacts to SEA Protected Trees (Non-Heritage)

Scientific Name	Common Name	Applicant Impacts						SCE Impacts		
		Northern Gen-Tie			Southern Gen-Tie					
		Removals	Encroachments	Total Impacts	Removals	Encroachments	Total Impacts	Removals	Encroachments	Total Impacts
Fraxinus velutina	velvet ash	1	–	1	1	–	1	–	–	–
Juglans californica	Southern California black walnut	–	–	–	1	–	1	–	–	–
Juniperus californica	California juniper	19	9	28	34	7	41	38	5	43
Platanus racemosa	California sycamore	–	–	–	–	–	–	–	–	–
Populus fremontii	Fremont cottonwood	–	–	–	–	–	–	–	–	–
	Total	**20**	**9**	**29**	**36**	**7**	**43**	**38**	**5**	**43**

Table 6. Potential Impacts to SEA Protected Heritage Trees

Scientific Name	Common Name	Applicant Impacts						SCE Impacts		
		Northern Gen-Tie			Southern Gen-Tie					
		Removals	Encroachments	Total Impacts	Removals	Encroachments	Total Impacts	Removals	Encroachments	Total Impacts
Fraxinus velutina	velvet ash	–	–	–	–	–	–	–	–	–
Juglans californica	Southern California black walnut	–	–	–	–	–	–	–	–	–
Juniperus californica	California juniper	4	1	5	6	1	7	2	3	5
Platanus racemosa	California sycamore	–	–	–	–	–	–	–	–	–
Populus fremontii	Fremont cottonwood	–	–	–	–	–	–	–	–	–
	Total	**4**	**1**	**5**	**6**	**1**	**7**	**2**	**3**	**5**

Table 7. Summary of Potential Individual Species Replacement Quantities

Scientific Name	Common Name	Applicant Impacts						SCE Impacts		
		Northern Gen-Tie			Southern Gen-Tie					
		Total Impacted	Replacement Ratio	Total Replacement Required	Total Impacted	Replacement Ratio	Total Replacement Required	Total Impacted	Replacement Ratio	Total Replacement Required
Fraxinus velutina	velvet ash	1	2:1	2	1	2:1	2	–	2:1	–
Juglans californica	Southern California black walnut	–	2:1	–	1	2:1	2	–	2:1	–
Juniperus californica	California juniper	28	2:1	56	41	2:1	82	43	2:1	86
Juniperus californica (Heritage Tree)	California juniper	5	10:1	50	7	10:1	70	5	10:1	50
	Total	**34**	**N/A**	**108**	**50**	**N/A**	**156**	**48**	**N/A**	**136**

Table 8. Regulated Streams and Impact Summary for the Project

Feature Name	Total in Review Area (acres / linear feet)	Permanent Impacts – Northern Gen-Tie Route (acres / linear feet)	Temporary Impacts – Northern Gen-Tie Route (acres / linear feet)	Permanent Impacts – Southern Gen-Tie Route (acres / linear feet)	Temporary Impacts – Southern Gen-Tie Route (acres / linear feet)	Reason for Impact
Non-Wetland Waters (NWW)						
NWW-1a	0.11 / 4,721.10	0.09 / 3,955.44	–	0.09 / 3,955.44	–	BESS
NWW-1b	0.18 / 7,588.43	0.18 / 7,588.43	–	0.18 / 7,588.43	–	BESS
NWW-1c	0.07 / 2,950.89	0.004 / 192.04	–	0.004 / 192.04	–	BESS
NWW-1d	0.02 / 726.21	0.02 / 695.88	–	0.02 / 695.88	–	BESS
NWW-2	0.36 / 15,514.64	–	0.002 / 109.03	–	0.01 / 381.07	Gen-Tie Work Area*
NWW-3	0.16 / 7,137.38	–	–	–	–	–
NWW-4	0.02 / 820.21	–	–	–	–	–
NWW-5	1.52 / 66,392.91	0.01 / 492.05	0.15 / 6,665.97	0.01 / 492.05	0.24 / 10,268.78	Permanent: Gen-Tie Access Road Temporary: Gen-Tie Work Area*
NWW-6	0.14 / 6,146.93	–	–	–	–	–
NWW-7	0.77 / 33,648.35	–	–	–	–	–
NWW-8	0.18 / 7,864.03	–	–	–	–	–
NWW-9	0.11 / 4,930.38	0.03 / 1,498.06	–	0.03 / 1,498.06	–	BESS
Non-Wetlands Subtotal:	*3.64 / 158,441.46*	*0.33 / 14,421.90*	*0.16 / 6,774.99*	*0.33 / 14,421.90*	*0.24 / 10,649.85*	
Swales						
Swale-1	0.01	–	0.001 / 23.54	–	0.01 / 226.18	Gen-Tie Work Area*
Swale-2	0.10	–	–	–	–	–
Swale-3	0.06	–	0.01 / 364.88	–	0.01 / 364.88	Gen-Tie Work Area*
Swale-4	0.04	–	0.04 / 1,668.81	–	0.04 / 1,668.81	Gen-Tie Work Area*
Swale-5	0.08	–	–	–	–	–
Swale-6	0.04	–	–	–	–	–
Swales Subtotal:	*0.33 / 14,293.81*	–	*0.05 / 2,057.22*	–	*0.05 / 2,259.86*	
Erosional Feature (EF)						
EF-1	0.03 / 1,304.01	–	–	–	–	–
EF-2	0.09 / 3,908.98	–	–	–	–	–
EF-3	0.03 / 1,122.88	–	–	–	–	–
EF-4	0.05 / 2,315.62	–	–	–	–	–
Erosional Feature Subtotal:	*0.20 / 8,651.49*	–	–	–	–	–
Total	**4.16 / 181,386.77**	**0.33 / 14,421.90**	**0.20 / 8,832.22**	**0.33 / 14,421.90**	**0.30 / 12,909.71**	

Note: Totals may not sum due to rounding.

Attachment A

Email Correspondence

From: Jahani, Ali@Energy <Ali.Jahani@energy.ca.gov>
Sent: Friday, October 9, 2026 4:00 PM
To: Garrett Lehman; Erin Phillips
Cc: Knight, Eric@Energy
Subject: Request for Clarification on Jurisdictional vs. Non-Jurisdictional Impact Acreages

Hi Garrett,

As we continue reviewing the updated project data, we realized that we need additional clarification regarding the distinction between jurisdictional and non-jurisdictional impact acreages along the alignment.

To help us properly understand and assign mitigation responsibilities, could you please prepare tables and accompanying text that clearly identify:

• The acreages of vegetation, SEA resources, trees, drainages, and any other sensitive biological resources
• Broken out separately for the northern and southern portions of the alignment with impacts delineated **up to the POCO** for jurisdictional components and **from the POCO** for non-jurisdictional components.

The new data has been very helpful, but it appears that the current calculations do not clearly define where the jurisdictional boundary lies, making it difficult to determine which mitigation measures fall under the applicant versus SCE.

Additionally, we have a **water-related question** regarding the LSA impact tables. In the new LSA (TN 273001, pdf page 237), **NWW-1c** is shown as not being impacted; however, the maps and associated text indicate that a portion of NWW-1c lies within the BESS footprint. To resolve this discrepancy, could you please provide:

• The **acreage of NWW-1c within the BESS footprint** (i.e., permanent impact acreage)
• Confirmation on whether the previously stated **total impact acreage of 0.33 acres** remains accurate, or a revised total if appropriate

• Provide the linear feet of impact for each impacted water.

We suspect NWW-1c may have been mapped as part of NWW-1a or NWW-1b, which may explain the inconsistency.

This should be a relatively quick exercise for your team, and receiving these clarifications will allow us to move forward with the review.

Please let me know if you have any questions.

Thank you,
Ali

Ali Jahani (he, him, his)

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